

## FERPA Compliance Canvas Shell Workgroup Recommended Process

1. Faculty requesting merging of Canvas shells (for CRNs taught by the same professor, in the same modality, i.e., asynchronous online, synchronous online, hybrid, or in person) will complete a self-paced training on how to show compliance with FERPA. This is a onetime training and certification. If there are significant changes to FERPA faculty may be required to complete an updated training.
  - The faculty will upload certification and screenshot of settings for one course via Smartsheet to the Office of Distance Learning and Instructional Technology (ODLIT).
    - The workgroup recommends the certification and screenshot verification must be uploaded no later than August 1, 2023, for fall '23.\*
  - ODLIT will verify certification and settings based on the submitted screenshot without going into the professor's course. This clearance will be forwarded to the division office(s) via a Smartsheet.
  - A "backend" tool such as Impact will walk faculty through compliance checks for FERPA and may be available as help with the training.
2. Once the items above are complete faculty will request through IT to merge Canvas shells (for CRNs taught by the same professor, in the same modality, i.e., asynchronous online, synchronous online, hybrid, or in person). This is done for all merged courses each time. It will have a check mark that the faculty checks stating they have met the FERPA requirements and have set the appropriate settings. Requests received after the submission deadline will continue through the approval process; however, there is no guarantee the course will be approved by the start of the fall '23 semester.
3. IT will forward requests for merged shells for approval:
  - Division dean receives an email notification from the IT HelpDesk asking for approval of the requested merged shells.
  - If the courses are not stacked, lecture/lab, credit/noncredit mirrored, linked, and cohort classes, FERPA certification is required. The division dean will check the ODLIT lists to verify they have met the FERPA requirements and have the appropriate settings.
  - If the courses are stacked, lecture/lab, credit/noncredit mirrored, linked, and cohort classes, the division will approve.
4. Once approved IT will merge the shells.

No consensus was reached on the following, which indicates that they will have to be further addressed within the negotiations process:

- The current process includes VPI approval after Division approval. The faculty did not believe this step was necessary.
- Faculty expressed concern that if they have to wait for the compliance verification, then it could potentially prohibit faculty from merging shells in Fall 2023. The workgroup



recommended a date; however, ODLIT, FA, IT, and Senate should determine a date that allows sufficient time for shells to be approved and merged.

- Administrators expressed the need to ensure compliance prior to merging. If the “backend” generated compliance report indicates a lack of compliance, during the review of the request to merge shells, then the request for merging would be denied. Then the requests for merging shells would be remediated for the professor to resolve the concern. There is no guarantee of merging after the deadline has passed.\*\*
- Faculty believe the training should be compensated.

Outstanding questions: if the “backend” report shows a lack of demonstrated compliance, there needs to be a remediation plan. The group did not address this, and it should be negotiated.

\*\*Members of the workgroup met on June 21, and outlined the process indicated in bullet 3 above.

#### References:

Distance Learning Committee Recommendations on Merged Shells (April 2023)