June 3, 2020

Re: Examination Proctoring Using ProctorU

Dear students[1],

The Committee on Educational Policy (CEP) thanks you for your letter laying out the concerns about using the company ProctorU to provide online proctoring for examinations at UC Santa Cruz. In this response, we will try to answer your questions. **We are copying the chairs of all course-sponsoring agencies on this letter because several of the points in this letter are aimed at faculty.** (All these points are highlighted, so that they can be easily noted.)

With the exception of UC Berkeley, all nine undergraduate campuses of the University of California are providing various forms of online proctoring as options for faculty, if they feel that proctored examinations are essential for their course. Seven of these campuses include ProctorU in their list of options. For the last 4-5 years, UC Online courses offered through the UC Innovative Learning Technology Initiative (ILTI) have provided ProctorU[2] and other online proctoring options for instructors.[3]

We recognize that online proctored examinations raise serious questions about privacy, accessibility, and allowing students to make informed decisions. We ask all instructors to **think carefully before they conclude that proctored examinations are essential for their course.** Just because proctored examinations are used when a course is offered in person does not make them the best solution when the course is offered remotely. Options include numerous, short-timed, unproctored and open-book tests, where the duration may make it harder — in some disciplines — to plagiarize; portfolio reviews; individual or group presentations; exams in all disciplines that require annotated bibliographies; and/or exams that use question banks to randomize questions.

The website that instructors have to go to in order to request ProctorU service includes numerous alternatives for instructors to consider before it leads them to the online ProctorU form. On the form, there is a statement that

> Online proctoring is an imperfect solution used by the campus in response to specific circumstances… even in the best of times there are technical issues that prevent a small number of students from completing exams, and some students may have longer wait times for exams to be launched by proctors.

These resources provide clear information to instructors, which was one of the points you raised in your letter. (Information aimed at students is provided here.) If you believe that there is some additional information that would be useful to provide on these webpages, please contact online@ucsc.edu and it will be considered.

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[1] This letter is a response to a letter sent by a group of students, whose names are not being disclosed here.

[2] Students in these courses have had the option to take examinations in person, although this would not have been practical for most students from other campuses.

[3] Arizona State University, which has been much more involved with online courses for some time, uses online proctoring companies similar to ProctorU. (UCSC is looking into whether ProctorU can accommodate Chromebooks.)

That instructors are considering whether proctored examinations are really necessary is reflected in the fact that there are only 3,200 instances of examinations being offered through ProctorU at UCSC in Spring 2020[4], out of approximately 15,000 students x 3 courses/student = 45,000 students in courses. Thus, online proctored examinations are rare, as they should be.

At the same time, we do not believe that it would be reasonable for us to ban ProctorU for all courses. Different fields have different requirements. It is difficult to detect academic integrity violations in a field where there is one unique answer to a question, and one 'natural' method to arrive at that answer.[5] This is especially true for a lower division course, where the questions have to be at an introductory level. This means that you may be enrolled in three courses, two of which have unproctored examinations and one does not, reflecting the differences between the courses and not any unfairness on the part of the third instructor.

Online proctoring is not synonymous with ProctorU. Other private companies are used, and have been evaluated by UCSC Online Education or its counterparts at other campuses. These companies either have accessibility problems that limit access for some students, or are as onerous as ProctorU, or are easy to foil. Thus, for a reliable proctored online examination, we have — for the moment — found no better alternative to ProctorU.

This does not mean that we cannot do more to address your concerns. We will group them into three categories:

Privacy: ProctorU is a signatory to the UC Data Security policy. This is in addition to their general privacy policy that is applicable to all their clients. Identity verification service providers used by ProctorU are bound by the same UC policy. Students have to display two forms of acceptable photo identification (in addition to a government-issued ID, there are various allowable options including a UCSC student ID; students are not advised to use their Social Security card); the IDs used need not contain the personal information listed in ProctorU's privacy policy, but if a student uses photo identification that includes such information, it is received by ProctorU. Exemptions are regularly made for students who do not have a government-issued ID (see UCSC's ProctorU FAQs). ProctorU also collects a student's biometric faceprint as part of the process for verifying a student's IDs with their webcam video. All this information is destroyed in seven days.[6]

ProctorU exercises broad control over a student's computer when they are accessing the instructor's examination. For this short period of time, the ProctorU employee takes control of the student's computer, enters the exam password in Canvas (the student never has the password for clear security reasons), and then gives control back to the student. At all times during the examination period, the student is able to view what controls the proctor has over their computer,

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[4] This does not include examinations in ILTI courses which have been routinely offered through ProctorU. (See previous paragraph.)

[5] With the advent of companies that use the Internet to facilitate cheating in examinations, it can happen on a scale that is impossible to ignore. We have received numerous reports from instructors in whose courses this has happened.

[6] Unless there is a discrepancy in the identity verification process, but then the restrictions stated earlier in this paragraph apply.

and all of this information is included in the session log. Unfortunately, there is no other way to have meaningful online proctoring; any limited software that ProctorU might instead use could be thwarted by other software.

ProctorU also makes some students uncomfortable because they are being constantly monitored.[7] However, after the initial setup of the exam, a student is recorded but not live-monitored; proctors are available by chat if students have questions. The video recording is only viewed if the artificial intelligence system that ProctorU uses flags possibly suspicious activity at some point in the examination, or if UCSC requests to see the video. It is not available to third parties. Videos are only available to ProctorU personnel and to UCSC employees who are designated as ProctorU administrators, and to instructors who request access to videos from their exams.

Accessibility: It is an inescapable fact that online proctored examinations require students to have better facilities than an in-person examination would. This is true for all companies, not just ProctorU. Computers have to satisfy certain minimum standards. A minimum Internet bandwidth, and a reliable connection, are required. **We request instructors to recognize these burdens and assess individual requests for alternative tests** in the same way they might assess requests from a student who has difficulty taking an in-person examination, e.g for illness[8]. (If the number of such requests is small, it may be possible to arrange Zoom-proctored make-up examinations for these students.) **We also ask instructors to consider shorter examinations,** where the probability of a failure in the Internet connection during the examination — a probability that is small but non-zero — is reduced. Finally, in view of the burden that is placed on students, instructors should **limit themselves to no more than three online proctored examinations in a course. If there are three exams, at least one should be administered by the last date to drop classes in the term.**
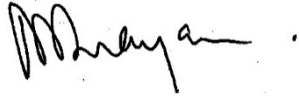
Information: In your letter, you ask that students and instructors should be properly informed about ProctorU. Earlier in this letter, we have referred to the websites that provide this information. In addition, starting with courses offered during Summer 2020, **instructors must inform students as part of the syllabus, distributed during the first week of instruction, if they are using ProctorU for their course.**

We hope that we have, to some extent, managed to reduce your concerns, even though they will not have been eliminated. In the end, we can only reiterate the comment quoted earlier in this letter: online proctoring is an imperfect solution used by the campus in response to specific circumstances. We look forward to the time when these circumstances are behind us. In the meantime, if students have suggestions for how we could better manage online proctoring, we will be happy to look into them.

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[7] Of course, this is always true with in-person proctoring.

[8] There is a limited number of loaner laptops available through Slug Success if such accommodation is not feasible, but this should be the last resort; the supply can easily be exhausted.

Sincerely,

Onuttom Narayan   Herbert Lee
Chair, Committee on Educational Policy   Vice Provost for Academic Affairs

cc: Department and Program Chairs
        College Provosts
        Divisional Deans
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        Quentin Williams, Acting Vice Provost and Dean of Graduate Students
        Jaye Padgett, Vice Provost for Student Success
        Jennifer Baszile, interim Vice Chancellor for the Division of Student Affairs and Success
        Michael Tassio, Director, UCSC Online Education
        Jody Greene, Associate Vice Provost for Teaching & Learning
        Rick Gubash, Director, Disability Resource Center
        Don Smith, Chair, Graduate Council
        Lindsay Hinck, Chair, Committee on Courses of Instruction