

Guidance on Online Assessment and Proctoring Software

Date: October 29, 2020

While the Distance Education Committee often advocates for educational technologies to support student success, we find online proctoring software in general to be highly problematic and the purpose of this guidance is to create awareness and suggest alternatives. Any faculty member who chooses to use online proctoring software should be aware of the concerns related to [equity and inclusion](#), [privacy](#), and other issues outlined in this guidance. In fact, [San Francisco State University's Academic Senate recently passed a resolution banning the use of third-party proctoring](#) due to these concerns. This guidance is in accordance with the campus-wide equity goals outlined in the [CCC Distance Education Strategic Plan](#), the [CCC Strategic Plan](#), as well as the [CCC Academic Senate resolution passed unanimously on July 1, 2020](#) that commit to equity, diversity, inclusion, social justice, antiracism, and culturally-relevant and culturally responsive teaching practices.

To promote academic integrity, we recommend communicating [CCC's Academic Honesty Policy \(p. 19-20\)](#) in your syllabus and having a class discussion of the policy's importance when logging into Canvas, Zoom, etc. Remind students or have them sign an academic honesty statement before assessments.

We strongly encourage the consideration of authentic assessments and other possible alternatives instead of online proctoring software to measure students' acquisition of learning objectives and outcomes.

Authentic Assessment

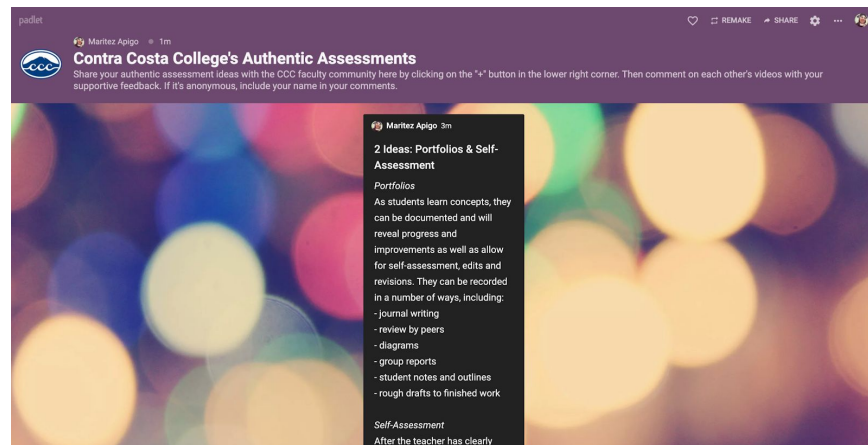
Authentic assessment reflects a commitment to equity-minded, culturally-responsive, and student-centered teaching pedagogy by providing students with opportunities to apply what they've learned and connect their learning on a deeper level to the world around them ([Culturally Responsive Teaching and the Brain: Promoting Authentic Engagement and Rigor Among Culturally and Linguistically Diverse Students by Zaretta Hammond](#) and ["Equity and Assessment: Moving Towards Culturally Responsive Assessment" by Erick Montenegro and Natasha A. Jankowski](#)). Alternative assessments of learning outcomes that involve real-world, higher-order, authentic methods, while still ensuring academic integrity, include:

- Prioritizing critical thinking questions, activities and assessments over rote memorization (ie google-able answers) and consider tasks that require higher-order thinking skills (evaluate, create, analyze, apply) over lower-order thinking skills (remember, understand), such as the following (see [Bloom's taxonomy](#)):
 - **process** questions allow students to show how they arrived at an answer
 - **application** questions allow students to apply what they learned
 - **evaluative** questions allow students to assess resources used in learning concepts
 - **research** questions can mimic the work being done in your discipline
 - **reflection** questions allow students to reflect and think metacognitively on what they learned
- [PBL/Project-Based Learning](#) in which students learn by actively engaging in real-world and personally meaningful projects.
- Presentations (individual or in groups).
- Students record short videos of their screen to demonstrate learning (ex: using Canvas Studio or Flipgrid)
- Untimed, open book/notes exam formats where students cite lectures notes, papers, textbooks, journals, and websites
- Short answer or short essay instead of multiple-choice questions
- Collaborative group assessments/projects/presentations

Examples of Authentic Assessments

- Sciences: Students write a report, create an infographic, record screencast videos teaching mini-lessons, or deliver a research presentation on scientific concepts.
- Math: Students explain how they worked out the problem by writing out their process or making a screen recording video talking through their process. There is a wealth of real-world, culturally-relevant assessment ideas in [David Stocker's book *Math That Matters 1*](#) linking math and social justice. Another good book is [Rethinking Mathematics: Teaching Social Justice by the Numbers by Eric Gutstein and Bob Peterson](#).
- Nursing: Students evaluate a patient scenario, record a video, write a care plan for a disease process, or create a brochure found in a doctor's office.
- See [UC Davis's Keep Teaching resource on "Testing"](#) for more examples.

- See the [@ONE Authentic Assessments Guide](#) for more concrete examples.
- View alternate authentic assessment [ideas for those offering synchronous instruction](#).



We invite you to [share your ideas for authentic assessments with the CCC faculty community](#).

CCC's Instructional Designers, Monica Landeros (mlanders@contracosta.edu) and Lauren Nahas (lnahas@contracosta.edu), are available to support your creation of authentic assessments tailored for your courses.

Equity Concerns with Online Proctoring Software

This technology, based on artificial intelligence and biometrics, has been found to be:

- **Racist:** Facial detection and recognition technology is calibrated for white skin as the norm. It has a consistent inability to identify Black, Brown, and Asian people, placing students of color at a disproportionate disadvantage ([“A US government study confirms most face recognition systems are racist” by Karen Hao](#) and [“Amazon face-detection technology shows gender and racial bias, researchers say”](#)). In addition, students from certain cultural backgrounds are not permitted to be on camera, which makes them unable to take a test with proctoring software.
- **Genderist/Transphobic:** Transgender or non-binary students may not be identifiable using facial detection and recognition technology if they are in the gender transitioning process ([“Facial Recognition Software Has a Problem” by Lisa Marshall](#)).
- **Ableist:** Students with disabilities, such as ADHD, rapid eye movement, or neuromuscular disabilities are at a disadvantage when the software is flagging head,

body, and eye movements as suspicious behaviors (“[Our Bodies Encoded: Algorithmic Test Proctoring in Higher Education](#)” by Shea Swauger).

Potential emotional, mental, and educational consequences:

- **Is stressful and anxiety-provoking:** Students on the Student Success Committee and Distance Education Committee are expressing difficulty focusing on the content of the exam while being recorded because they are so concerned about keeping their bodies and eyes still and not appearing to be cheating. It can alter students’ performance if they’re feeling anxious or frustrated and if it’s not recognizing their face. More perspectives from CCC students and tutors are detailed in the [Feedback on Proctorio from CCC Campus-Wide Tutoring](#). Additionally, the student voice is represented in the article “[Students Are Pushing Back Against Proctoring Surveillance Apps](#)” by Jason Kelley.
- **Invades student’s privacy:** The [CCCCO’s Legal Opinion: Cameras-On Requirements](#) issued on Oct. 19, 2020 states, “Districts should adopt policies strictly limiting or prohibiting faculty from instituting cameras-on requirements in order to protect against violations of...California’s student privacy law” (7). A student’s perspective is presented in the article “[How It Feels When Software Watches You Take Tests](#)” by Anushka Patil and Jonah Engel Bromwich.
- **Places students living with others (parents, for example) at a disadvantage** to finding uninterrupted blocks of time and a private room to take online proctored exams. If anyone approaches them during an exam, the proctoring software could flag this as “suspicious” behavior if no one else is allowed to be in the same room.
- **Views students as guilty and promotes a culture of suspicion and surveillance.** It uses artificial intelligence to flag students’ “suspicious” behaviors. Normalizing the experience of being monitored by proctoring software could trigger deep-seated trauma in students related to policing and surveillance.
- **Lacks adequate security:** Student data can be shared with third parties. Data breaches in online proctoring software demonstrate a lack of security, [such as with ProctorU](#).

Proctoring software produces technological barriers:

- **Bandwidth and reliable internet access issues:** Video surveillance via web cameras requires high-bandwidth and reliable internet access that low-income, housing insecure, and homeless students do not always have access to. [2019 Basic Needs Insecurity data](#) indicates that 66% of CCC students are housing insecure and 22% of

CCC students are homeless. [Statewide data is available on the #RealCollege survey report.](#)

- **Technological difficulties:** Proctoring software adds an additional technological burden to students who are already struggling in this area. The Welcome Center reports that they often work with students who are seeking help with proctoring software-related technical issues.

Additional recent sources regarding the equity concerns:

- [“Snooping Where We Sleep: The Invasiveness and Bias of Remote Proctoring Services” by Albert Fox Cahn, Esq., Caroline Magee, Dr. Eleni Manis, PhD., and Naz Akyol](#), Nov. 11, 2020.
- [“Pushback Is Growing Against Automated Proctoring Services. But So Is Their Use” by Jeffrey R. Young](#), Nov 13, 2020.
- [“Cheating-detection companies made millions during the pandemic. Now students are fighting back” by Drew Harwell](#), Nov. 12, 2020.

Should online proctoring software still need to be used, we recommend faculty:

- Take an exam using the online proctoring software to experience it from the students’ perspective.
- Reduce the use of online proctoring software to the minimum.
- Use the least restrictive proctoring software settings.
- Include in the schedule of classes “comments” section, *“This course uses online video proctoring software for exams. A computer, webcam, and microphone are required.”*
- Include online proctoring software requirements in your syllabus and orientation module, for instance, *“[Quizzes/Exams/Tests] in this class will be remotely proctored. In order to use this online proctoring software, you will need a computer, webcam, microphone, and install [this software], etc. If you do not have a computer, contact the instructor to make arrangements to [insert your preference: ex: borrow a computer or schedule an appointment on the CCC campus or via Zoom to take the text/exam].”*
- Include in your syllabus and orientation module an “opt out” mechanism that allows a student to decline online video proctoring considering students’ privacy, technical, or

religious objections ([CCCCO's Legal Opinion: Cameras-On Requirements](#), page 4-7), for example: *"If you do not wish to be webcam recorded by online proctoring software, make arrangements with the instructor to [insert your preference: ex: schedule an appointment on the CCC campus or via Zoom to take the text/exam]."*

- Contact [DSPS](#) if concerns arise regarding a student's accommodations prior to using online proctoring software.

Note that state funding for Proctorio expires on December 31, 2020. As of the date this guidance is issued, we are still waiting to hear from the state if there will be funding for online proctoring software in 2021.

November 2, 2020 update: The CCCCCO has announced to discontinue system-wide funding of Proctorio, an online proctoring software, due to the concerns.

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1. *This guidance was drafted with the DE Team on 10/2/2020.*
 2. *This guidance was presented to the DE Committee and a sub-committee was formed on 10/9/2020 for revision.*
 3. *The DE sub-committee revised and edited it on 10/22/2020, 10/29/2020, and asynchronously.*
 4. *This guidance was shared with the Academic Senate Council on 11/2/2020.*
 5. *This guidance was shared with the Council of Chairs on 11/4/2020.*
 6. *This guidance was endorsed by the racial affinity groups: AASA, LFSA, and the APIFSA steering committee in November.*
 7. *This guidance was endorsed by the Academic Senate Council on 11/16/2020.*
 8. *This guidance was shared with all faculty on 11/17/2020.*