Request for Feature / Functionality in Blackboard

General information

**Requestor name and department:** Malcolm LeMay, College of Business; Phil Harding, School of Chemical, Biological and Environmental Engineering

**Date requested:** 7/19/2012

**Request title:** Implement SafeAssign plagiarism prevention tool

**Note:** in 2010-11 Jon Dorbolo of Technology Across the Curriculum conducted an extensive evaluation of plagiarism detection tools, including SafeAssign. He worked closely with colleagues from College of Business, Engineering, Writing Intensive Curriculum, Center for Teaching and Learning, and the OSU Registrar. Jon presented his findings to the Executive Committee of the Faculty Senate. His report is linked as an appendix to this evaluation summary document, and addresses questions about pedagogical impact, FERPA, and legal concerns. [link pages 6-12 of this document as a PDF from the underlined text]

Description of need

**What is the need to be addressed?** The College of Business has been using a plagiarism prevention tool called TurnItIn during 2011-12. The publisher for that software has discontinued department licenses and now requires a university-wide agreement. This increases the license renewal fee by $1,000, to a total of more than $7,300, which is paid for with TRF funds. SafeAssign is another plagiarism prevention tool that is bundled and integrated with Blackboard. COB is requesting that SafeAssign be enabled in Blackboard in order to replace TurnItIn.

**How will fulfilling this request address this need?** SafeAssign offers similar functionality to TurnItIn, but there are no additional license fees. A critical factor is that SafeAssign is bundled with Blackboard, so it would be available for use in all Blackboard course sites. TurnItIn is not currently integrated with OSU Blackboard.

**How SafeAssign Works:**

SafeAssign can be used in two ways.

1. Instructors can set up SafeAssignments in their Blackboard courses and let students submit papers to these assignments, in a way very similar to standard assignments. As students submit papers, they are checked against SafeAssign's comprehensive databases of source material. The papers will then be delivered to instructors through Blackboard together with the originality reports, with the results of the matching process, attached to them.

2. Instructors may upload papers directly with the Direct Submit feature, without student involvement. SafeAssign checks all submitted papers against the following databases:
   - Internet - comprehensive index of documents available for public access on the Internet
   - ProQuest ABI/Inform database with over 1,100 publication titles and about 2.6 million articles from '90s to present time, updated weekly (exclusive access)
   - Institutional document archives containing all papers submitted to SafeAssign by users in their respective institutions
   - Global Reference Database containing papers that were volunteered by students from Blackboard client institutions to help prevent cross-institutional plagiarism.

[http://wiki.safeassign.com/display/SAFE/How+Does+SafeAssign+Work](http://wiki.safeassign.com/display/SAFE/How+Does+SafeAssign+Work)
### Impact to students

<table>
<thead>
<tr>
<th>How often do you think students would make use of this feature/functionality?</th>
<th>Instructors who choose to use SafeAssign would do so by creating a specific assignment type called a SafeAssignment. SafeAssignments are different from all other Blackboard assignments and content types. It is not possible to convert an existing Assignment a SafeAssignment without starting from the beginning, so frequency of use depends on adoption of SafeAssign by instructors. Note that some OSU instructors have raised significant concerns on the use of plagiarism detection tools, which are included in the 2010-11 report appended to this document. As of Spring 2012 TurnItIn was used in 30 COB courses, with approximately 370 users.</th>
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**Describe how students would benefit:** There would be a financial benefit to students if OSU discontinues paying license fees via TRF funds for a product that we already own in Blackboard.

Plagiarism detection tools can protect students from having their work used by others, and can strengthen their understanding of academic integrity and ethical behavior. SafeAssign and similar tools also encourage original writing from students and proper attribution practices. Students may be given opportunities to analyze and revise their work, and correct accidental or intentional errors of documentation.

For a pedagogical perspective at this university, in July 2012 Dr. Susan Meyers, Director of Writing, submitted a report on the effectiveness of writing curriculum within the Baccalaureate Core at OSU. It was prepared by the Committee for the Review of Writing within the Baccalaureate Core, which was appointed by the Faculty Senior Executive Committee to assess writing components within the Baccalaureate Core. As stated in the report’s Executive Summary: “The committee found that, although writing at OSU is not yet in a dire situation, we are not where we want to be, neither in terms of internal expectations, nor with respect to peer institutions.” The committee recommended actions in the following areas: Faculty, Student, and University Involvement; Clarity of Expectations; Quality of Assignments; Effective Evaluation of Student Work. In addition, the faculty survey portion of the report noted concerns about student dishonesty and recommended, among other things, improving student understanding of plagiarism.

**Describe how benefit to student would be measured or evaluated.** E.g., what improvement would you expect to see one term or one year out? Do you know if the requested feature or functionality includes a way to track usage? Click here to enter text.

**Approximate number of students who would benefit (e.g., all students who use Blackboard? One class? One or more departments/colleges?):** Click here to enter text.

Are there any costs, training considerations, or other elements that would impact students? The following training resources would be recommended, at a minimum: 1. A tutorial for students on submitting SafeAssignments. The tutorial should include a description of how SafeAssign works, and how and where the work that students submit is used and retained. The BSC should consider recommending whether students should be informed prior to enrolling in a course if SafeAssign is required.

### Impact to instructors

**Describe how instructors would benefit:** With proper use, tools like SafeAssign give instructors a way
to proactively guide students to original, properly-cited work. They can provide an opportunity to set expectations for academic integrity at OSU, and offer a consistent way to evaluate all student work within a given course or program.

**Approximate number of instructors who would benefit** (e.g., all instructors who use Blackboard? One class? One or more departments/colleges?) At a minimum 30+ COB courses would use a plagiarism detection tool as soon as it is available in Blackboard. There are many requests across the university, from Engineering, eCampus, etc.

**How often do you think instructors would make use of this feature/functionality?** (Every day, once per term, etc.) Frequency of usage depends upon the nature of the course and the number of writing assignments an instructor gives.

**Would this feature help implement specific pedagogical tools associated with teaching?** If yes, please describe briefly. The College of Business reports that they use TurnItIn (which essentially works the same way as SafeAssign) as an instructional tool in their 100-200 level courses for properly citing sources as well as for helping students define and recognize plagiarism; in the 300-400 level and MBA courses the system is used to actively discourage plagiarism. A number of COB students have requested that instructors use plagiarism detection software to reduce incidences of cheating and to help them improve their writing. Instructors can set up a Draft SafeAssignment that allows students to run a draft of their paper through the plagiarism prevention algorithm without submitting it to the reference database(s) for indexing. This can give students a way to learn proper citation of sources.

**Describe training impact for instructors, i.e., how significant do you think would the change be for instructors in their use of Blackboard? In their course development/delivery?** Implementing SafeAssign (or similar tool) would have a significant impact on the instructors who elect to use it, and potentially on those who do not. A rich offering of training and support must be developed, delivered and maintained for instructors as a condition for enabling it in Blackboard. Training is required because SafeAssign returns statistical reports on scanned assignments with links to questionable sources. Instructors must proactively investigate to assess the flagged content and rule out false positives or other issues. Instructors must also receive training and support on cultural factors that may influence students’ awareness and understanding of academic dishonesty.

**Compliance**

**FERPA** - The Family Educational Rights and Privacy Act requires that schools have a student’s consent prior to the disclosure of education records. Will any student data be sent or exposed to outside parties (e.g., publishers) with this solution? If so, provide statements from the solution provider to demonstrate how the requested feature complies with FERPA.

In the report appended below, Jon Dorbolo requested a finding from the Registrar's office to ensure FERPA compliance of SafeAssign. OSU's Registrar at the time, Kent Kuo, along with Tom Watts determined that SafeAssign usage would comply with FERPA and is consistent with OSU privacy and information policies. Kent emphasized that instructors must include their intention to use SafeAssign in the course syllabus in order to comply with academic rules. Kent asserted the need to produce an FAQ on SafeAssign and plagiarism for students and faculty, including links to information about the student appeal process. **These findings should be reviewed by the new registrar, Rebecca Mathern, after she joins OSU (September 10, 2012).**

**508** – Section 508 of the American with Disabilities Act requires that all Web site content be equally accessible to people with disabilities. Provide statements from the solution provider to demonstrate how this feature is compliant with 508.
SafeAssignments are a content type that is fully integrated with Blackboard. Uploading a SafeAssignment to Blackboard is very similar to uploading a standard Assignment. SafeAssign reports are displayed on a Web page; they can be printed or emailed. The BSC recommends that Disability Access Services review this system.

### OSU IT Acceptable Use Policy
- Note any potential issues with the Acceptable Use Policy (information security; copyright, etc.)

Click here to enter text.

### Legal / contractual

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<tr>
<th>Do you know if the solution requires an agreement with an existing vendor?</th>
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<tr>
<td>No</td>
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<tr>
<th>Do you know if the solution requires an agreement with a new vendor?</th>
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<tr>
<td>No</td>
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<tr>
<th>Any concerns around copyright or intellectual property to be aware of?</th>
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<tr>
<td>The appended report documents extensive analysis on legal concerns raised by plagiarism detection tools. This work reached the conclusion that archiving student work for plagiarism detection falls within the fair use exception to copyright infringement. <em>These findings should be reviewed by OSU’s legal counsel.</em></td>
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### Other considerations

<table>
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<tr>
<th>Will any work roles or business processes be changed or created if the request is implemented?</th>
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<tr>
<td>Training and related documentation are recommended for Help Desk support staff.</td>
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<tr>
<th>Are there any usage or licensing restrictions for the proposed solution? I.e., does it only apply to a particular college or sub-set of users?</th>
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<tbody>
<tr>
<td>SafeAssign would be enabled as a building block. Once this happens the SafeAssign content type would be available for instructors to configure in all Blackboard course sites, just as they do with quizzes, discussion boards, links, assignments, etc.</td>
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The Blackboard Steering Committee recommends the following action on this request:

<table>
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<tr>
<th>Action</th>
<th>Description</th>
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<tbody>
<tr>
<td>Approve</td>
<td>move ahead with implementing request (following IT scheduling and change control processes, as applicable)</td>
</tr>
<tr>
<td>Decline</td>
<td>take no action on this request</td>
</tr>
<tr>
<td>Defer</td>
<td>hold off further action on this request pending other conditions or further information</td>
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**Impact** - The Blackboard Steering Committee has determined that this request has the following impact on Blackboard users:

<table>
<thead>
<tr>
<th>Impact Level</th>
<th>Description</th>
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<tbody>
<tr>
<td>High</td>
<td>Requested solution benefits many; addresses a critical liability</td>
</tr>
<tr>
<td>Medium</td>
<td>Requested solution benefits some users; workaround is awkward</td>
</tr>
<tr>
<td>Low</td>
<td>Requested solution is ‘nice to have.’ Change is cosmetic / not disruptive to end user experience</td>
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**Priority** - The Blackboard Steering Committee has assigned following priority to this request:

<table>
<thead>
<tr>
<th>Priority Level</th>
<th>Description</th>
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<tbody>
<tr>
<td>High</td>
<td>Requested solution should be implemented as soon as is feasible, ahead of lower-priority requests</td>
</tr>
<tr>
<td>Medium</td>
<td>Requested solution is not urgent but should be scheduled for a reasonable time</td>
</tr>
<tr>
<td>Low</td>
<td>Requested solution should be implemented when resources/capacity allow</td>
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</table>

**Recommendation details:**
Compliance summary (FERPA; 508; Legal/contractual) -
Technical analysis -
Other considerations (e.g., work / process change; user restrictions; licenses) -

**Date of Steering Committee Action:**

**This evaluation summary drafted by:**

**This evaluation summary drafted on:**
Appendix 1: TAC SafeAssign Investigation

Summary: SafeAssign is a program designed for detection of plagiarism. SafeAssign is already part of the OSU Blackboard system but is not enabled. Faculty from Engineering and Business have requested access to plagiarism detection tools. A SafeAssign processed assignment will be created by an instructor if and as desired; students will submit their written work files (e.g. doc, docx, rtf, pdf) in Blackboard. SafeAssign will run a match-check in four ways (1) against the web, (2) against a database of journal articles, (3) against an institutional database of OSU assignments, (4) against a inter-institutional database shared among SafeAssign using schools. The instructor will have reports on each submission with a statistical rating of the matched content and links to the matching sources. To use SafeAssign effectively, an instructor must go to the sources to judge the appropriateness of the matches and the possibility of plagiarism. In order to determine whether SafeAssign should be enabled as part of the OSU Blackboard tool set, Jon Dorbolo (TAC) has devised and conducted a process including liaison and pilot testing. Having determined that SafeAssign is technically sound, legal and policy compliant especially with respect to FERPA, and considered pedagogically valuable by some faculty, but having also found strong objections from the OSU writing community, it is time to bring this issue to the Faculty Senate. The issue is presently urgent because at least one college is planning to purchase Turnitin, which is a competing system to SafeAssign. That matters because the proliferation of plagiarism detection systems run locally by units will produce an inconsistent system without policy in a matter that is inherently curricular; academic honesty.

Proposal: The Faculty Senate Executive Committee will create an ad hoc “SafeAssign Investigation” committee with the charge of making recommendation to the Faculty Senate on whether SafeAssign should be enabled at OSU or not, and recommending policies and actions in the event that SafeAssign is enabled for the teaching/learning community.

Activity: To conduct an investigation into the practicality, policy compliance, and pedagogical effect of enabling the SafeAssign tool set as an option for instructors.

Purpose: To provide instructors with a common, centrally supported tool set for deterring and detecting student plagiarism on written assignment. To develop policies and actions to promote effective and reasonable use of plagiarism detection tools at OSU.

Background: Instructors come to TAC asking for help in checking suspected plagiarism cases. TAC has supported several plagiarism search tools which are used on a case-by-case basis, including Wcopy, Plagium, Jplag, and EVE2. These tools are collected or installed on a TAC workstation for instructor use. While these tools are effective in some instances, they are single-purpose software. In order to get the full value of a plagiarism detection, the instructor must use more than one. The interfaces and outputs of these low-cost programs leaves much to be desired. Instructors have voiced the desire to have such (improved) capabilities available in their own offices. When SafeAssign became potentially available with the Fall 2010 Blackboard upgrade, it seemed opportune to investigate this tool as a possible enterprise scale solution.

Jon Dorbolo (TAC) is leading this investigation as a liaison process. There is not a single committee or office (technical or administrative) with the charge to make instructional technology choices. Even if there were such an authority, it would be prudent to engage in a robust liaison process to ensure consultation with relevant stakeholders. The model of this investigation is to collect relevant information by analysis and testing; address the technical, management, legal, and policy aspects of the tool use at OSU; engage the academic community to assess the value, pedagogic impact, and ethical aspects of the tool use at OSU. The result is a sort of educational impact statement. If consensus is reached across the stakeholder groups, then the outcome of that consensus is carried forward (e.g. make the whole or parts of SafeAssign available to instructors). If a state of significant dissension of stakeholder groups is reached and cannot be negotiated, then the issue will be referred to the Faculty Senate Executive Committee.
Description: SafeAssign is a text matching program with a document upload (e.g. assignment submission) interface built into the Blackboard LMS. SafeAssign is implemented for an assignment by the instructor’s choice. SafeAssign reports are available to the instructor. There are several aspects of SafeAssign, some of which may be enabled or disabled at the system level. In this process is important for participants to recognize the complexity and options of the tool set. This is not merely a “turn it on or not turn it on” decision. A SafeAssign assignment will be checked against four sources for matching text:

1. The internet. This helps to defeat copying from Wikipedia and other internet sources. The report provides a statistical analysis indicating the degree of the found matches and links to the suspected sources.

2. A published articles database (2.6 million articles from more than 1000 publications). Work lifted from published articles, such as those available online from the OSU library, may be detected by these means.

3. SafeAssign papers submitted at OSU. This allows checking for copying within a course, across courses, and cumulatively through terms. This also deters students from resubmitting identical work in multiple courses; self-plagiarism.

4. A cross-institutional database. This database extends the scope of student works to be checked against. An option is to allow students to voluntarily submit their work to the cross-institutional database by selecting a checkbox at the same time that they upload their assignment. This is an opt-in for the student, who may decline just by not selecting the box.

Instructors have a “manual upload” tool by which they may submit files to SafeAssign for text-match checking. This allows plagiarism checking for work that is not submitted through a Safe Assign assignment. For instance, if the instructor collects files by email, they may run a check on those files. The instructor does not have the option to send student files to the cross-institutional database. That prerogative belongs to the student author.

SafeAssign will process the following file types:
- .doc and .docx – Microsoft Word
- .odt – OpenOffice.org Writer
- .pdf – Adobe PDF
- .txt – Plain text
- .rtf – Rich text
- .htm or .html – Web page
- .zip – Package of multiple files in any of the above formats (Direct Submit only)

Impact: TAC asserts that enabling SafeAssign at OSU will act as a deterrent to plagiarism, especially as TAC will communicate the purpose and operation of that tool to students via student groups, faculty, and student publications. SafeAssign will give instructors a structured, regular procedure for computer-assisted plagiarism checking. TAC will provide support to all instructors in the effective use of this tool set.

Process:
>Faculty Senate Executive Committee In Summer 2010 Blackboard 9 became available on an OSU development server in preparation for the Fall 2010 upgrade. Included in version 9 is SafeAssign. TAC worked with Frank Kessel, Blackboard Administrator (ECS) to analyze and test. We agreed that campus liaisons with key University stakeholders must be completed before SafeAssign could be enabled for instructors. Frank emphasized the need to establish FERPA compliance.

>Summer 2010. Philip Harding (Chemical, Biological & Env Engr) and Paul Montagne (Civil/Constr Engr) performed an investigation using archived papers to assess tool capability. Dr. Harding reported SafeAssign to be an easy to use tool with a high degree of value in the reporting. He and several other faculty have requested access to
SafeAssign for their courses. From this pilot, TAC concludes that SafeAssign is a tool that many instructors will value and use. Robust training and support (e.g. how to interpret reports) is a necessity in optimizing this value.

>11/04/2010: TAC Associate Director Jon Dorbolo presented SafeAssign to the Computer Resources Committee (CRC) of the Faculty Senate. The CRC members agreed unanimously that SafeAssign will be a valuable and acceptable resource for instruction. CRC members agreed that given that SafeAssign is part of the existing tool set, there is no basis to search for an alternative plagiarism detection tool, so long as Blackboard is in use at OSU.

>11/19/2010: TAC requested a finding from the Registrar’s office to ensure FERPA compliance of SafeAssign. Kent Kuo and Tom Watts determined that SafeAssign usage will comply with FERPA and is consistent with OSU privacy and information policies. Kent emphasized that instructors must include their intention to use SafeAssign in the course syllabus in order to comply with academic rules. Kent asserted the need to produce an FAQ on SafeAssign and plagiarism for students and faculty, including links to information about the student appeal process.

>11/19/2010: TAC presented the current stage of the process to Dennis Bennett, Writing Center Director. Dennis voiced strong concerns about the value, propriety, and impact of the use of SafeAssign. We agreed to pursue these issues by convening key members of the OSU Writing Instruction community including The Writing Center, Writing Intensive Curriculum (WIC), and the Director of Writing.

>April 29, 2011: I learned the College of Business may seek TRF funding to purchase and deploy Turnitin, a competitor to SafeAssign. Clearly one the difficulties of this liaison process for technology choices is that individual units may move independently of the process. Whatever the ultimate decision concerning SafeAssign, it will be better practice for students to have a consistent environment.

>June 10, 2011: I met with the Faculty Senate Executive Committee to update them on the plagiarism detection investigation and the development of COB licensing of Turnitin. I suggested the creation of a task force to draft policy and research issues related to plagiarism detection. The agreed to the task force and recommended that a COB deployment engaged as a pilot opportunity and that task force efforts be focused on answering key concerns (e.g. copyright violation of student work) and drafting of policy for instructors and students. The core of this task force consists of Dennis Bennett (Writing Center), Robin Pappas (CTL), Malcolm Lemay (Business), Philip Harding (Engineering), and Jon Dorbolo.

Future Liaisons:
>Office of Student Conduct
>ECampus
>Valley Library
>Baccalaureate Core Director
>Curriculum Council
>Assoc Prov Acad Success and Engagement
>Academic Deans
>ASOSU

Cost: Added support role, Blackboard administrative role, FAQ development, GEM development. SafeAssign is part of the implemented OSU Blackboard system, thus it is already paid for within that license.

This document is a result of the liaison process investigating the viability of implementing the SafeAssign program that is part of the OSU Blackboard Learn system.

In discussion about SafeAssign with faculty, staff, and students including leaders of the OSU writing community, several concerns and issues were raised. This document is meant as a summary of the positions put forward, though
not the full reasoning of the arguments involved. If this summary raises questions and further points it is advised to raise them with the respective individuals. Most of these issues are currently debated throughout higher education. I will gladly facilitate further discussions on these issues.
Appendix

>Impact on Students

Presumption of guilt
General use of Plagiarism Detection Software promotes a culture in which students are treated as potential cheaters without cause. This is a negative image to bring to teaching and learning on a system-wide scale. This objection was the basis for Jesse Rosenfeld’s successful suit against McGill University.\(^2\)

Re-purposing of student work
SafeAssign saves and reuses a student’s work beyond the scope and time-frame of the course for which it was produced. Student writing for graded assignments is effort with a specified purpose: as learning and demonstration of knowledge/ability. Appropriating student assignments for an institutional database creates a separate use of the work from that for which it was written. In SafeAssign students are not able to opt out of this extended use.

Valuation of effort
Appropriating student writing for extended uses without the permission of the writer conveys a negative message about the value and uniqueness of individual work. This message is in conflict with the values that underlie the prohibition of plagiarism.

>Impact on instruction

Detrimental to the quality of writing assignments
Computer content scanning may reinforce lower-quality writing assignments. Plagiarism and illicit collusion can be deterred by well-crafted writing assignments. Merely implementing SafeAssign will give the impression that plagiarism can be dealt with automatically rather than pedagogically. In a climate of rapidly increasing enrollment and class sizes, this is the wrong impression to produce.

>Impact on OSU

Precedents from universities, conferences, and courts
Some universities, via administrations, student groups, and faculty senates, have banned the uses of plagiarism detection software.\(^3\) A Canadian court ruled in favor of a McGill student who refused to submit assignments computer content checking.\(^4\) At the very least the use of computer content scanning is controversial and open to legal challenge.

Dan Burk (University of Minnesota Law) argues (Foster, 2002) that archiving student work via Turnitin and SafeAssign methods does not meet the conditions for fair use. [6]

Case law supports the claim that plagiarism detection tools need not infringe copyright of students’ work. In a 2007 suit, Eastern District of Virginia against iParadigms LLC, high school students claimed paper archiving in the Turnitin system is copyright infringement of the student’s

Appendix
work. [7] The district court found that the archiving of the papers fell within the fair use exception to copyright infringement, 17 U.S.C. § 504, and dismissed the students’ claims. In 2009 the United States Court of Appeals for the Fourth Circuit unanimously affirmed the 2007 decision of the district court. I have not found case law related to copyright and SafeAssign. There is plenty of speculation by those who are not legal professionals.

Court findings that archiving student work for plagiarism detection is a practice of fair use and not copyright infringement. That is, archiving student’s work was not a copyright infringement because it falls within the fair use exception to copyright infringement.

Placing appropriate value of education
To effectively address plagiarism and the qualities of writing, OSU should dedicate resources to faculty development and student education. To do so would be an educational approach to the issues as befits an educational institution. Only with such a commitment to pro-actively increasing integrity and honesty, could technologies such as computer content checking be considered valuable. It may be appropriate to augment the instructor’s role via technology, but it is not appropriate to automate it, particularly not with educational writing.

Accuracy of SafeAssign reports
SafeAssign returns statistical reports on scanned assignments with links to questionable sources. This is valuable only as an indicator for the instructor to investigate further. SafeAssign may flag false positives, for instance by judging properly for quotes as instances of copying. There is no substitute for human judgement in these matters. With SafeAssign OSU runs the risk of mistaken charges of plagiarism based on errors in or misuses of the software.

Notes:
2. McGill student wins fight over anti-cheating website. CBCNEWS. [link]

7. 2007. Eastern District of Virginia against iParadigms LLC. 
www.umbc.edu/ogc/docs/av_v_iparadigms%20re%20turnitin.pdf