



**UNIVERSITY SYSTEM OF GEORGIA**

# Procedure on Preferred Names within USG Systems of Record

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Dr. Todd Watson

Associate Vice Chancellor, Chief Information Security Officer, USG

Sarah Wenham

Director, Student Enrollment Services, USG

# Purpose

The procedure outlines the guidelines for collecting, storing, and displaying preferred names in Systems of Record that manage enrolled student and employee information. The aim is to respect individuals' preferred names while providing consistent identity management standards and reducing the risk of fraud by impersonation.



# Scope

The procedure applies to Systems of Record at all institutions within the University System of Georgia and other integrated systems that authoritatively record enrolled students and employee information.

## Effective Date

July 1, 2025



# Definitions



# System of Record

**System of Record** – An information system that is the authoritative data source for a given data element or piece of information. Systems of Record in this context are Student Information Systems, Human Resources Information Systems, and Identity Management Platforms (including identification card management systems).



# Preferred First Name

**Preferred First Name** – The first name that an individual chooses to use. If different than the individual's first Legal Name, it is typically provided by the individual through an Employee or Student Self Service system.

# Legal Name

**Legal Name** – A person's name as it appears on Official Government Documents and is provided by the individual for identification.



# Official Government Document

**Official Government Document** – Government-issued identification sufficient to confirm the individual's identity. Government-issued identification examples include a birth certificate, driver's license, passport, federal or state-issued identification, federally issued naturalization/immigration documentation, etc.

## Credential

**Credential** – A record of accomplishment earned by the student and granted by the institution. Specifically, a diploma, transcript, or certificate.



# Guidance



# Legal Names

- a) The name stored in the Systems of Record for enrolled students and employees must always match the Legal Name on the individual's Official Government Document.
- b) The Institution is responsible for ensuring that any Legal Name entered into the System of Record for enrolled students and employees is supported by an Official Government Document, reviewed and approved.



# FAQs

## *When must student records be verified?*

**Q1.** At what point in the admission and enrollment process must a new student's Legal Name be verified as matching an Official Government Document?

**A.** Enrolled students must be verified by no later than the end of drop/add.

**Q2.** Does the Legal Name verification requirement apply to new and continuing students?

**A.** Priority should be given to the records of student admitted or readmitted for Fall 2025. Reviewing and updating records of continuing students would be the next priority.



# FAQs

## *What systems does the procedure apply to for students?*

**Q12.** Must institutions collect and verify Legal Name in their recruitment CRMs like TargetX? Must institutions display Legal Name for prospective students & applicants as outlined in the procedure?

**A.** Institutions may utilize a student's preferred name when communicating and providing lists, etc. related to prospective students. The new guidance applies to enrolled students and the System of Record. A CRM is not considered a System of Record.

**Q13.** Does the procedure apply to other systems connected to the System of Record, such as StarRez & D2L? For example, if an institution generates a report or roster from StarRez or D2L that includes Preferred Name, must that also be accompanied by the Legal Name as outlined in the procedure?

**A.** Institutions may opt to display the Preferred Name without the Legal Name in systems other than the System of Record.



# FAQs

## *How can a student's legal name be verified? (1/2)*

**Q4.** Can institutions complete the verification using the information found on a student's Institutional Student Information Record (ISIR) received from the U.S. Department of Education (ED)?

**A.** Yes, the Legal Name verification may be completed using a student's ISIR when the student's name on the ISIR matches the student's Legal Name in the System of Record and other student information on the ISIR (DOB, SSN, address, etc.) supports that the records match.

**Q5.** Can a student's Legal Name be verified using an expired document, such as an expired driver's license or passport?

**A.** Yes, while a current document is preferred, it is recognized that some students may not be able to present an unexpired document.



# FAQs

## *How can a student's legal name be verified? (2/2)*

**Q6.** What are the options for students who do not have an Official Government Document?

**A.** Institutions may work with students who indicate they do not have an Official Government Document on a case-by-case basis.

**Q9.** How should institutions verify the Legal Name for students living outside the U.S. and participating in online programs?

**A.** Students living outside the U.S. should present a government-issued document. This could include a birth certificate, government-issued health card, driver's license, etc. Institutions should use their professional judgment to work with students from outside the U.S. on a case-by-case basis. Institutions may also verify a student's Legal Name based on an official high school or postsecondary transcript and/or an international credential evaluation completed by an accepted third party.



# FAQs

## *How must name discrepancies be handled? (1/2)*

**Q7.** What steps should be taken if a student presents an Official Government Document that does not match their name in the System of Record?

**A.** Institutions should contact the student to determine the source of the disparity and use their professional judgment to determine appropriate action. In some cases, the Legal Name in the System of Record may need to be updated to match the Official Government Document.

**Q8.** Can a birth certificate be accepted if the name on that document doesn't match the student's current Legal Name in the System of Record?

**A.** The verification cannot be completed based on a birth certificate if the name on the birth certificate does not match the student's current Legal Name in the System of Record. In cases where a Legal Name change has occurred, a court order from the court where the name change was granted may be accepted. A marriage certificate or a divorce decree may also be accepted.



# FAQs

## *How must name discrepancies be handled? (2/2)*

**Q10.** Can the verification be completed if a student's Legal Name in the System of Record uses only a middle initial, but their Official Government Document shows their full middle name (or vice versa)? Can the verification be completed if their Legal Name in the System of Record includes a middle name, but their Official Government Document does not (or vice versa)? Can the System of Record include an individual's maiden name as their middle name if that does not match what is provided on their Official Government Document?

**A.** The Legal Name verification pertains to the student's first name and last name only.

**Q11.** Can the verification be completed if a student's legal first name in the System of Record uses only an initial, but their Official Government Document shows their full first name?

**A.** Yes, a student may be verified based on an Official Government Document showing their full first name with the System of Record showing an initial only for the first name.



# FAQs

## *Other considerations...*

**Q3.** Are institutions required to track that a student's Legal Name has been verified in Banner?

**A.** Each institution should establish a tracking process to ensure the Legal Name for each enrolled student is verified.



# Collection & Storage of Preferred Names

- a) Institutions may collect Preferred First Names via applications for admission, financial aid, employment, or other self-service mechanisms.
- b) If collected, preferred First Names must be stored in the System of Record as a field separate from the Legal First Name.



# Institution Issued Identification Cards

- a) Preferred First Name may be displayed on the front of institution-issued identification cards, provided that the person's Full Legal Name also appears, preferably on the back.



# Awarding of Credentials

- a) Institutions must use the person's Legal Name only when issuing transcripts.
- b) If permitted by Institution policy, a student's Preferred First Name may be used on a diploma or certificate if requested, provided the Preferred First Name is listed with the person's full Legal Name—for example, *Jonathan Edward Smith (Jon)* or *Jonathan (Jon) Edward Smith*.



# Display of Preferred Names in Systems of Record

- a) Institutions may display the individual's Preferred First Name on devices or screens, rosters, reports, etc., in/from Systems of Record, provided the Preferred First Name is listed with the person's full Legal Name—for example, *Jonathan Edward Smith (Jon)* or *Jonathan (Jon) Edward Smith*.
- b) The person's Legal Name must always accompany the person's Preferred First Name within Systems of Record.



# Inappropriate First Names

- a) USG institutions should not recognize requests to use a Preferred First Name that is considered vulgar, offensive, obscene, or otherwise reasonably inappropriate.



# FAQs

## *Additional questions?*

**Q14.** Who should institutions contact if they have additional questions about the *BPM Procedure on Preferred Names within USG Systems of Record*?

**A.** Institutions may contact Tim Chester and/or Todd Watson with any questions about the *BPM Procedure on Preferred Names within USG Systems or Record*.

