

# Montana Carl D. Perkins Policy and Procedures Manual

**Subject:** Accountability  
**Policy:** Maintaining and Storing Student Data  
**Effective:** July 1, 2007  
**Revised:** Not Applicable

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Montana will meet or exceed all [Family Educational Rights and Privacy Act \(FERPA\)](#), [State of Montana Information Technology Division](#) and [Montana Board of Regents Information Technology](#) policies, procedures and requirements to assure student identifiable data is transferred, stored and maintained in a secure manner.

## **Secondary Procedures:**

The Office of Public Instruction (OPI) works with the state of Montana to take advantage of existing infrastructure to ensure the security of the student information system and enforce network security policies. The OPI has developed a Student Records Confidentiality Policy which establishes procedures and responsibilities governing the access, use and dissemination of confidential, sensitive and/or restricted student information by the Office of Public Instruction. The student information system adheres to FERPA guidelines.

The Achievement in Montana (AIM) data system provides an efficient and encrypted way to transfer student-level data across electronic lines called *ePass Montana*. This electronic file transfer service is located on Montana's official state website, [mt.gov](http://mt.gov), and provides a safe and encrypted way to transfer confidential student-level data. The Montana OPI uses *ePass* to provide secure access to the AIM and Electronic Grants (E-Grants) Management System as well as to the State of Montana encrypted file transfer service.

[OPI Student Records Confidentiality Policy](#)

[AIM Security Policy – contact OPI Accountability Specialist \(Click on this link, then on the “Contact” button on the top menu.\)](#)

[AIM ePass Information](#)

[Montana Secretary of State Retention and Disposition Schedule](#)

## **Postsecondary Procedures**

The Perkins Accountability Specialist (PAS) will assure the [Montana Board of Regents policy regarding privacy, security and monitoring of information technology](#) and the [Montana Information Technology Policies](#) will be adhered to.

***File Transfer from Grantee:*** Knox.montana.edu is a secure file server to be used for secure storage and sharing of sensitive information. Both MSU and non-MSU users can be granted access to individual folders. Secure folders have been set up for each grantee for files with student information in them. The PAS must request access to the folder by emailing the KNOX administrators at [knox@montana.edu](mailto:knox@montana.edu) the access form found in the student database reports. (the report name is RPT\_KNOX\_Access) After receiving access to the KNOX secure file server, the grantee will set up their access by following [these instructions](#).

***File Transfer from KNOX to CITRIX:*** The PAS has secure access to each KNOX grantee secure server folder. The Perkins student and grant databases are housed on a CITRIX Secure Server with the Department of Public Health and Human Services (DPHHS). Password protected access to the Grant database is secured by assigned access to a folder. The information is secure even though no personally identifiable information is accessible. Access to the folder is requested by completing [this form](#) generated by the PAS. The signed form is then emailed or faxed to the designee on the form. The DPHHS security personnel will assigned access and a login ID to the requested grantee. The PAS will provide [notice](#) including login ID to the grantee.

The student database containing the minimal student information necessary to generate indicator results is accessible only by the PAS, the OCHE Perkins Coordinator and Perkins State Director. Files are opened in the KNOX secure folders, copied then pasted into the appropriate table in the student database. Files must never be saved to any other folder outside of the secure KNOX folders or within the CITRIX secure database tables.

***Transfer to Placement Verification Partners:*** Annually the PAS generates files containing a list of social security numbers only for enrolled students. No other identifying data is included in the file. The file is to verify retention, placement and employment with the Montana Unemployment Insurance Records Division (MUI), National Student Clearinghouse (NSC), Montana University System Data Warehouse (MUSDW) and Federal Employee Data Exchange System (FEDES). Files are hand carried to each source on a CD. The file is loaded to a secure folder for the source agency. After the file is delivered to all sources, the CD is permanently destroyed. A similar process is used to retrieve the matching records. The files will never contain anything other than a list of social security numbers.