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**UNIFIED COMPLIANCE FRAMEWORK®**  
The Science of Compliance.®

## **Usage of the Unified Compliance Framework® for Demonstration of Institution of Higher Education Compliance**

The Department of Education (ED) is collaborating with Institutions of Higher Education (IHEs) to increase the IHEs' capability to avoid cyberattacks and comply with state and federal regulations related to data privacy and security.

ED, via a public-private partnership, has initiated the IHE Compliance Framework project to create a system that will streamline and automate the process IHEs use to protect against cyberattacks.

ED has launched an IHE Compliance Framework Portal that accesses the Common Controls Hub of the Unified Compliance Framework® (UCF®) developed by Unified Compliance. This document will guide you through orientation, account set up, control list creation, and compliance tracking and reporting.

# Contents

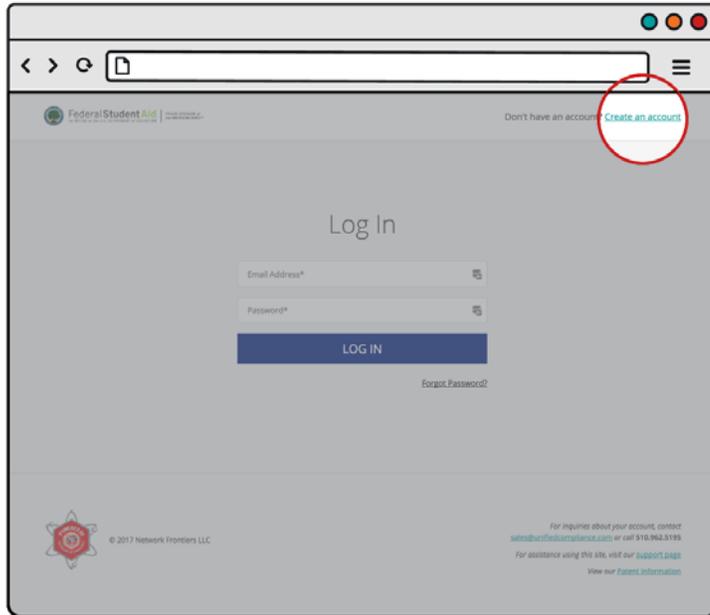
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## Getting Set Up

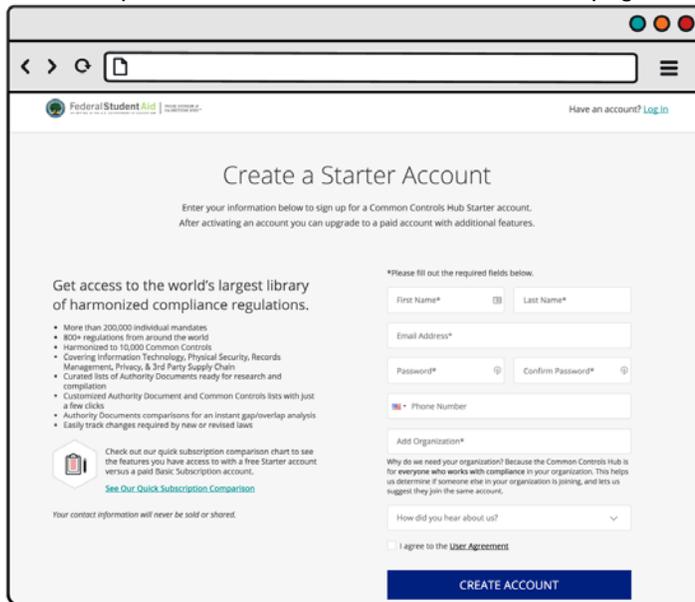
With free access to the ED portal, you can familiarize yourself with how to select Authority Documents and create and view lists of controls. First, you will need to set up your account.

### Create Your Account

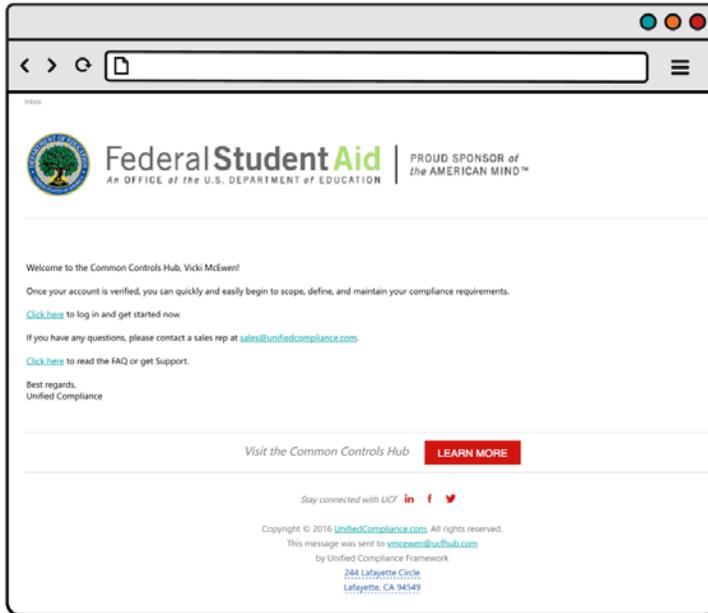
1. Go to <https://ed.commoncontrolshub.com/>
2. Click the [Create an Account](#) link in the upper right corner.



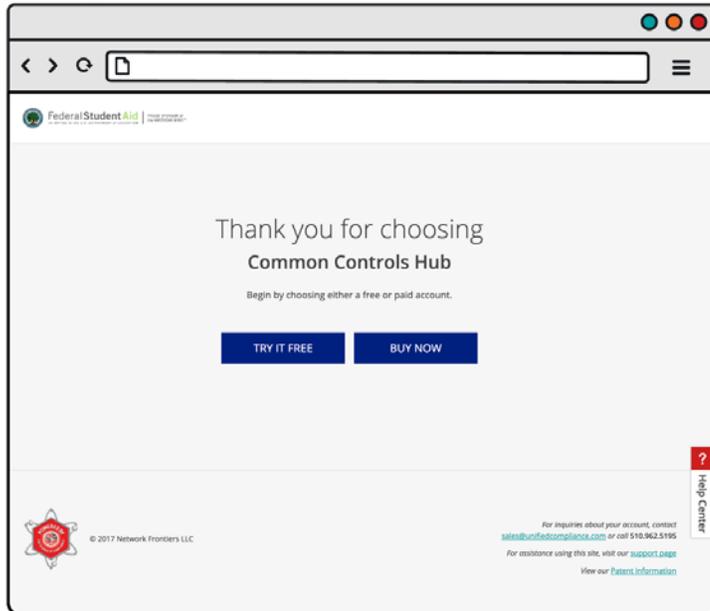
3. Fill the required fields on the "Create an Account" page and click the **Create Account** button.



4. Check your e-mail for an account verification e-mail from the UCF Team (be sure to check your spam folder). Once found, open the e-mail and click on the [Click here](#) to log in and get started now link.



5. Click **Try it Free**.

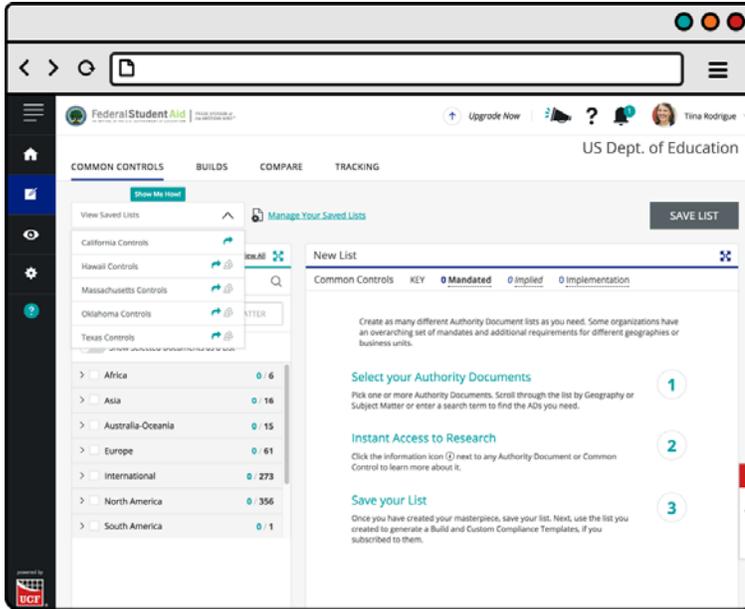


6. Fill out your profile information. Upload your school logo and a profile picture.

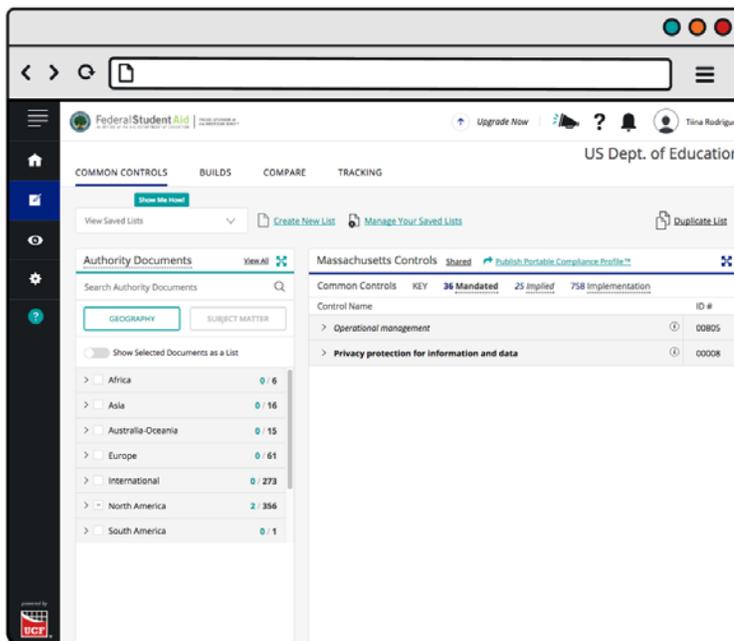
The screenshot shows a web browser window displaying the 'Create Your Profile' page. The page header includes the 'Federal Student Aid' logo and the text 'Complete your profile by filling out your information below or skip to continue to your Dashboard.' Below the header is a circular profile picture placeholder with the text 'Upload your photo' and 'JPG file only, under 500K'. To the right of the photo placeholder is a 'Choose File' button. Below the photo placeholder is a 'Title' text input field. Further down is an 'Upload Logo' button with a 'Choose File' button to its right. Below the logo upload section are several form fields: 'Country' (a dropdown menu), 'Address One', 'Address Two', 'City / Town', 'Zip / Postal', and 'State / Province / Region' (a dropdown menu). At the bottom of the form is a blue 'CREATE PROFILE' button and a link that says 'Skip Create Your Profile'.

## View Sample Lists

ED has created sample lists for several states – CA, TX, HI, MA, and OK which include each state's privacy laws, FTC Red Flag Rules, and 16 CFR Part 314. Navigate to the Common Controls to the View Saved Lists and select any list;

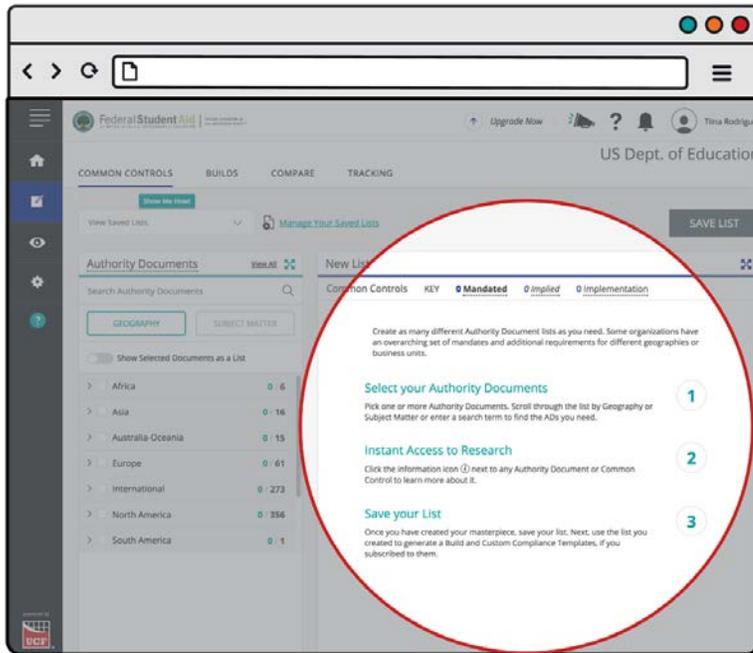


The mandated, implied, and implementation controls will populate on the right. You can mouse over each and see the definitions for each type.



## Create Lists

In addition to these privacy requirements, there are guidelines from the FFIEC Handbooks and other regulations that apply to IHEs. You may opt to add these Authority Documents to the pre-created list or create separate lists of controls to comply with. Just follow these simple instructions for list creation.



## Request Sample Builds

Once lists of controls are created, builds for export are available with paid accounts. This functionality is covered in the next section.

For a sample build, please contact Aubrey Bousley at [abousley@unifiedcompliance.com](mailto:abousley@unifiedcompliance.com).

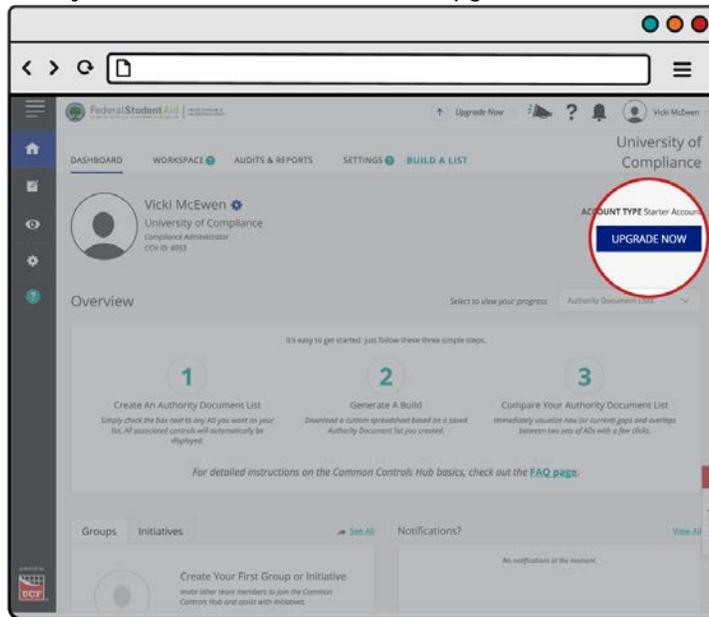
## Creating a Paid Account

A paid account grants access to the following premium content;

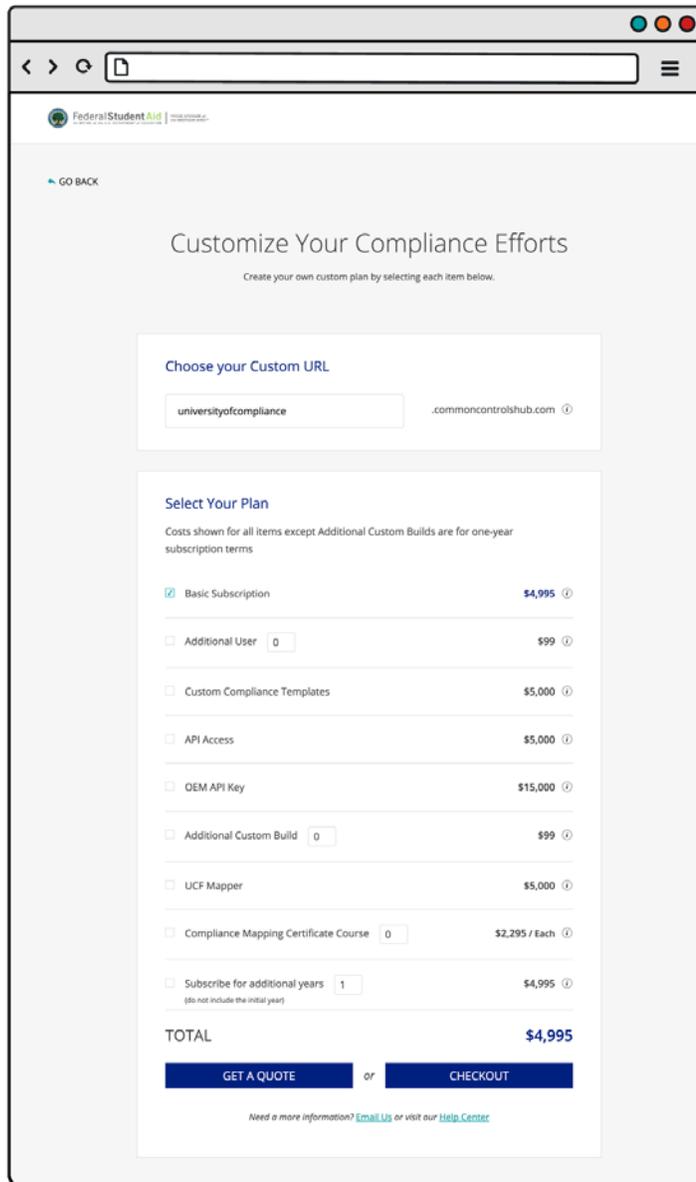
- Build spreadsheets containing **all** mandated and implied controls
- The most current versions of laws, regulations, and best practices
- Additional functionality including creating your own builds and reporting on compliance through the attestation portal

## Purchasing

1. Login to your CCH account.
2. From your CCH Dashboard, click the Upgrade Now button.



3. Enter your custom URL. The Basic Subscription will give you everything you need. Then click the Checkout button when finished.



You will be prompted to pay with a credit card, purchase order, or ACH.

## Creating Lists and Builds

You will use the same Authority Document selection process to create your lists. The differences with a paid account is you will be able to include the most current laws, regulations, and best practices in your builds. Plus, all controls, not just a sample, are included in the exported spreadsheets, the builds.

## Attestation Portal Usage

Key to the compliance process is tracking compliance with the required controls from your list. This is done in the Attestation Portal.

## Implied and Required Mandates

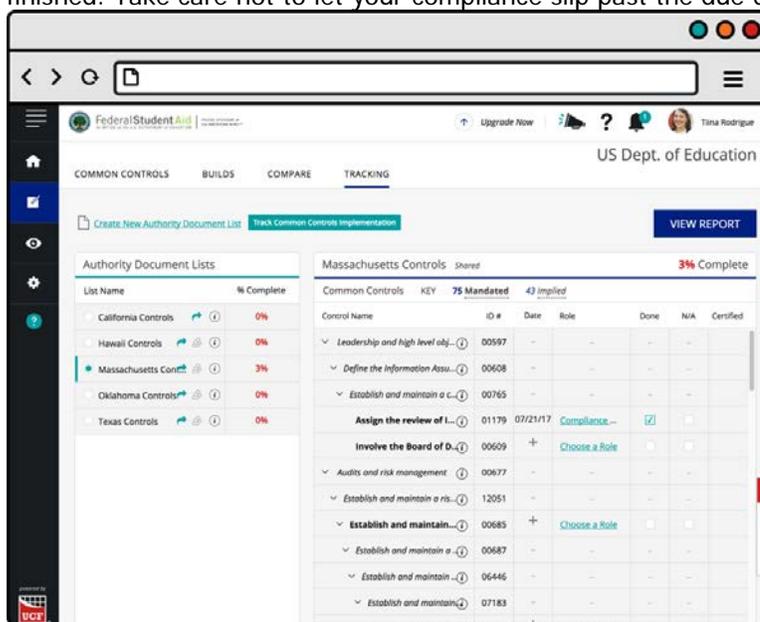
Navigate to the Tracking and select the list of controls you wish to track. Mandates in bold are required. Mandates in italics are to give the required mandates context. Only required mandates must be addressed where assignments, dues dates and status are reported on.

## Role Assignment

It is estimated that 1-4 employees at each IHE will be using the system. Those employees may include Federal Aid professionals, Chief Information Security Officers and staff, Risk Officers, Acquisition professionals. When assigning roles to each mandate, multiple roles can be assigned to a single individual. You will need to select the role and assign an individual.

## Due Dates

Due dates are at the discretion of each IHE. You will need to mark your controls as completed when finished. Take care not to let your compliance slip past the due date.



## Evidence

Evidence should be collected and maintained for each mandated control. It is recommended indexing of the evidence utilizes the UCF Control ID. While laws, regulations, and best practices change, the UCF ID remains the same. The evidence need only be collected once for a single UCF control tied to multiple Authority Documents.

## Reporting

Reporting can be seen in the Audits & Reports section. You can click on the blue **View Report** button in Tracking or click on the eye icon on the right-hand navigation, select your list, and the status of compliance will be visible.

