



Helping a higher education institution  
comply with protected data regulations

## Background

Since 2015, the federal government has made several changes to the regulations that govern the protection of Controlled Defense Information (CDI) and, more recently, Controlled Unclassified Information (CUI). These changes, which could include how both research and student data in higher education institutions are stored, protected, and accessed, has significant implications for federal funding sources such as grants and student financial aid. Essentially, these changes apply to any CUI data that is stored on or transmits through a higher education's network or computing environment. For more information, see the National Institute of Standards and Technology Special Publication 800-171 (NIST SP 800-171).

Deloitte Risk and Financial Advisory was recently engaged to assist a major higher education system to help facilitate compliance with these new regulatory changes across multiple campuses and member organizations that fall within their higher education system's network.

The Deloitte Risk and Financial Advisory team assisting this system combined deep higher education experience with significant depth in guiding federal government and private sector clients in this area, and applied that knowledge to the specific challenges faced by the university system. The team further differentiated themselves by helping to address the nontechnical components associated with compliance such as higher education governance, unique business processes, and the federated nature of teaching and research organizations that make up a higher education ecosystem.

## Innovative solution

To help address the dynamic and evolving set of federal CUI regulations, the Deloitte Risk and Financial Advisory team assisted in the design and deployment of a research security office (RSO) shared service organization. This organization focuses on governance and processes necessary for compliance, as well as technical solutions to facilitate specific security requirements.

The scope of the project included designs for the RSO, assessment tools for compliance, blueprints for system and network modernization and resiliency, and onboarding processes to determine those granted access to certain types of data are authorized or de-provisioned as needed in near real time.

## Benefits and impact

As a result of these efforts, the system includes a governance framework with defined responsibilities to address compliance requirements in the federated structure of a university system. Deloitte Risk and Financial Advisory's efforts include working with key stakeholders to provide a risk-based plan of action, as well as milestones, so the system stands out as a model of nimble security and resiliency. Deloitte Risk and Financial Advisory established a set of processes designed to address new requirements and assess ongoing compliance, in addition to concentrating on change through effective and regular communications to, and training of, the broad range of affected faculty, staff, and students.

For more information, visit

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