

Introducing PIB

A Personal Internet Branch for
Credit Union Members

Brought to you by
It's Me 247 Home Banking

Revised: January 6, 2009

What's all the fuss about?

- In November 2005, the NCUA issued letter 05-CU-18 in response to an FFIEC guidance, "Authentication in the Electronic Banking Environment"
- This letter has thrown the marketplace into a tizzy and has led to many consulting opportunities and projections about what credit unions "must" do

*Sound familiar? TIS was going to put us out of business.
Y2K was the end of the world. So is two-factor
authentication a doomsday mandate or not?*

What's all the fuss about?

- What MUST be done?

"You should identify and evaluate the risks associated with the Internet related services you provide for your members...Ultimately the risk assessment should result in the implementation of risk mitigation controls and techniques commensurate to the type and level of risks presented by the Internet related services."

- In other words...you must evaluate what services you are offering and decide whether they warrant additional authentication techniques or security measures in serving your members

Sound familiar? You need to run your business in an effective and sound manner to better serve your members.

What's all the fuss about?

- What it does NOT say:
 - Everything a member does on the Internet is risky
 - All Internet transactions are equally risky
 - You must immediately begin spending more money
 - You must get out of home banking
 - You should spend big bucks before you understand whether or not you make big bucks on Internet banking
 - Today's market solutions are rock solid and you need to buy now
 - Financial institutions, regulators, and soothsayers actually know how financial consumers will respond

*Sound familiar? This is a guidance where a risk assessment needs to be made to understand how to respond to the future. In other words...**have a plan.***

The NCUA's Expectations

- What the NCUA expects credit unions to do:
 - **Assess risk** of internet-based products and services
 - Determine if **authentication program** is effective / establish effective authentication methods
 - **Monitor systems** for unauthorized access
 - **Report** unauthorized access
 - **Notify members** of unauthorized access, if warranted
 - **Educate** members
 - Complete process by year-end 2006

Source: "Authentication Guidance in the Internet Environment" webcast presented through NAFCU on June 7, 2006, by Dominick E. Nigro, NCUA Information Systems Officer

Effective Authentication Methods

- If risk assessment identifies inadequate authentication for high risk transactions, implement one of the following three options

- Multifactor authentication

(At least two of the following: something the member knows, something the member has, something the user is)

OR

- Layered security options

(Multiple controls and multiple control points; software tools such as challenge questions, second password, access controls, etc.)

OR

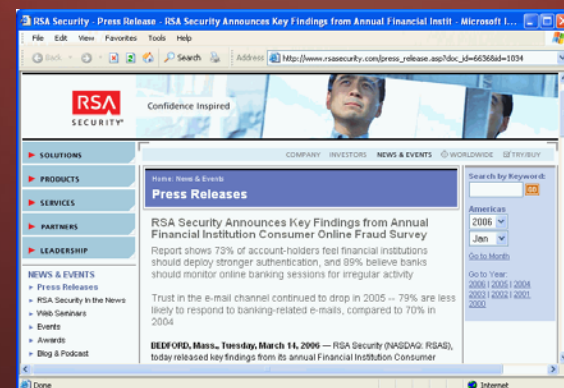
- Other controls

(Emerging and future technology)

Source: "Authentication Guidance in the Internet Environment" webcast presented through NAFCU on June 7, 2006, by Dominick E. Nigro, NCUA Information Systems Officer

What are members thinking?

- From recent RSA Security (www.rsasecurity.com) online fraud survey of U.S. consumers:
 - **We want better security...** 73% of account-holders believe that financial institutions should replace username-and-password log-in with stronger authentication for online banking. And of course the FFIEC agrees.
 - **But we really don't want to be required to do anything...** 89% of account-holders would like their banks to monitor online banking sessions for signs of irregular activity or behavior, similar to the way that credit card transactions are monitored today. When presented with several options for stronger authentication, 74% preferred their financial institution to use transparent, behind-the-scenes "risk-based" techniques to assess the legitimacy of their identities...



What does CU*Answers think?

- CU*Answers believes that we must use the power of the CUSO to:
 - Develop a risk assessment of the It's Me 247 process and features that helps CUs develop their own risk assessment
 - Develop new **layered security** features to allow CUs to configure Internet banking strategies in a way that personalizes member choices related to assuming risk when using CU Internet solutions
 - *Introducing the Personal Internet Branch (PIB) Profile*
 - *To be completed by December 31, 2006*
 - Develop a relationship with a "true" **two-factor authentication** provider for members and credit unions who wish to move forward with more aggressive Internet banking options in the future
 - *Pending; work to begin early 2007*
 - Strengthen current authentication (strong passwords) and member transfer controls

Previewing the CU*Answers Risk Assessment

CU*@HOME Risk Assessment: Product Feature List

List compiled as of February 1, 2006

Legend:

- (A) Types of information that can be seen about the member should an unauthorized person gain access to a member account via CU*@HOME.
 (B) Actions that can be taken with the member's information or money should an unauthorized person gain access to a member account via CU*@HOME.
 (C) Marked if the feature is considered a special security feature of the home banking software to help prevent unauthorized access or alert member of unauthorized activity.

Feature	Feature Overview	(A) Member Information That Can Be Seen	(B) Actions That Can Be Taken With Member Money / Info	(C) Considered a Special Security Feature
Standard Features				
Custom CU greeting message	<ul style="list-style-type: none"> Displayed on the login page 	--	--	
CU logo branding	<ul style="list-style-type: none"> Brand CU*@HOME screens with your credit union logo 	--	--	
Online help	<ul style="list-style-type: none"> Context-sensitive help from any screen describing CU*@HOME features, options and answering frequently-asked questions 	--	--	
Stand-in processing for 24x7 availability	<ul style="list-style-type: none"> Stand-in processing makes home banking services available even during nightly and monthly CU*BASE processing Includes all standard features (not VMS) 	See below	See below	
Custom Password (PIN)	<ul style="list-style-type: none"> Defined by member in CU*@HOME Default for new members is last four digits of SSN; member is required to change the password immediately on the first access (not allowed to set a new password that matches the SSN digits) CU can allow MSR to set a "custom" password in CU*BASE if requested by member 	-- (password not visible to member or CU staff; encrypted in CU*BASE data files)	Password can be changed	✓
Restricted password retries	<ul style="list-style-type: none"> Member is only allowed 3 tries before the password is disabled, to prevent someone from trying to "guess" a member's PIN CU can reset a disabled password to the default (last four digits of SSN); member is required to change upon first access 	--	--	✓
Member Indemnification "logon banner"	<ul style="list-style-type: none"> Members are required to accept the "CU*@HOME PC Home Banking Use Agreement" the first time they 	--	--	✓

G:\Product\Team\Main\Special Protect, Meetings, Agencies\Audio-PC Bank Books\Risk assessment\Feature List for home banking.doc

...and don't forget to review
(on www.cuanswers.com)



STRATEGIES FOR CONTROLLING MEMBER ACCESS TO CU*@HOME

May 14, 2004

An outline of the strategic decisions your credit union should make regarding the configuration and management of member passwords and activation settings.

Understanding Home Banking Password Options

In light of the increasingly security-conscious environment of the Internet, CU*@HOME Home Banking offers many flexible options for managing the passwords (also referred to as PINs) used by members to gain access to their accounts. Traditionally, members were allowed to use a single PIN to access both Audio Response and Internet Banking systems. While this is certainly popular with members who don't want to memorize yet another password, the changing security demands of the PC world have made this feature undesirable from a security standpoint.

In general, the longer and more complex a PC password is, the more difficult it is for an unauthorized person to obtain it. Along with the feature that limits the number of times someone can attempt to guess a password (3 retries) then the password is disabled, expanded passwords add an important layer of security for your members. Remember that, unlike audio response, which does not even say the member's name, home banking provides access to information that can be used for identity theft, such as name, address, phone, etc.)

Expanded passwords offer the following additional security features:

- Home banking passwords can be up to **10 alphanumeric characters**, including special characters.
- Passwords are **case-sensitive** (i.e., Dc44386ld is different from d544386LD).
- You specify a **minimum number of characters** (4-10) for the password. (At least 6 characters is recommended.)
- You can elect to "expire" a password after a certain period of non-use (such as 30 or 60 days).

In this case, "expiration" does not mean the password itself needs to be changed periodically; this expiration

What does CU*Answers think?

- The risk we see in evaluating Internet Banking services:

Risks to Members:

- That Internet Banking would cause a member to lose funds directly (i.e., check withdrawal or transfer to other person)
- That Internet Banking would allow someone to capture member personal identity information

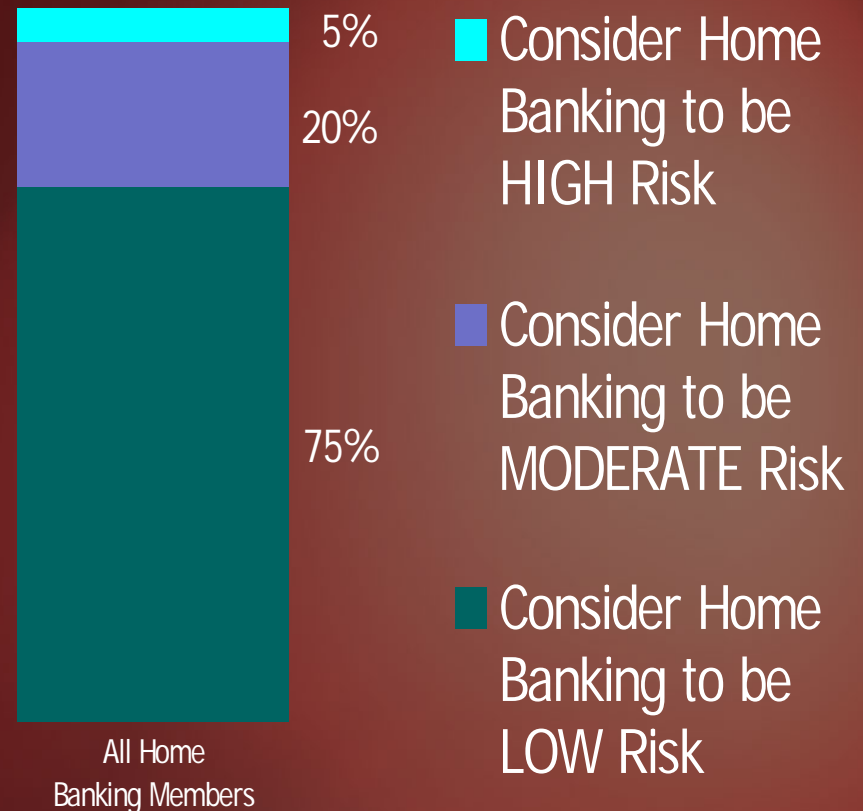
Risks to Credit Unions and CU*Answers:

- That security will become too expensive or complicated and therefore
 - Members will choose not to use CU Internet products
 - Credit unions will elect not to use CUSO Internet products

Without a doubt, the biggest risk to credit unions is that we would be locked out of the Internet self-service financial service industry in the future—either in the minds of our members, regulators, or ourselves.

What does CU*Answers think?

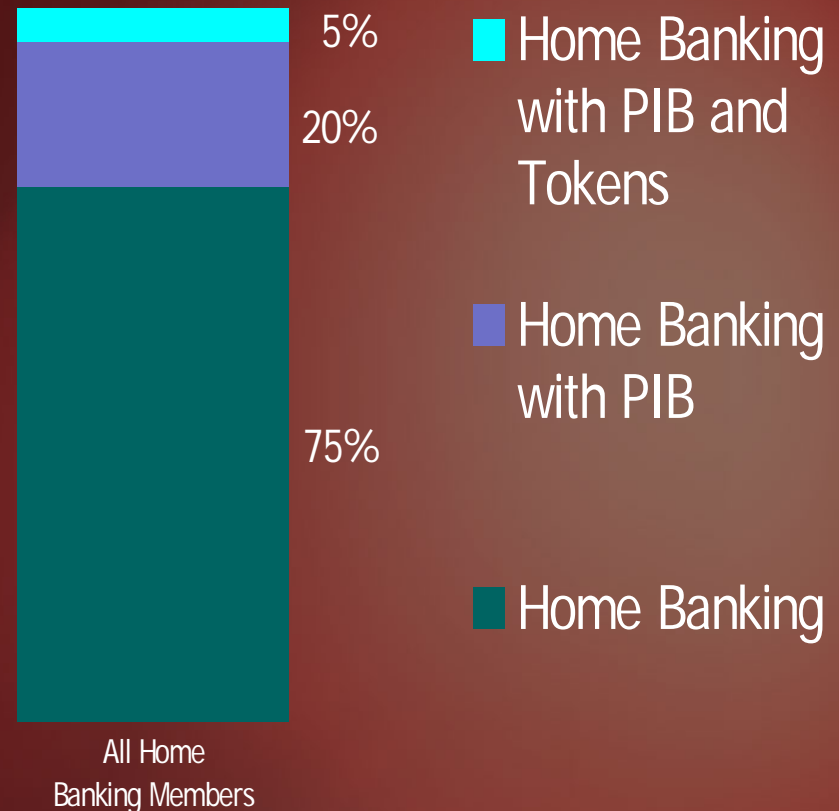
- Let's just consider It's Me 247 and how members will react
 - 5% of members will be engaged
 - 20% of members will be moderately aware
 - 75% of members will be indifferent
- What will you do and how will you target your member/customer for Internet services?



Potentially, your business plan will not be to aggressively serve the 5% of the market that requires "too expensive" solutions (i.e., online trading of stocks)

The It's Me 247 Solution

- CU*Answers believes the CUs should allow members to choose and offer both rich service offerings via the Internet and *a la carte* authentication strategies
 - Allows the member to pick the Internet experience that fits their life and assessment of risk
- This will allow CUs to pick and choose what services they offer along with the expense of insuring the member's risk in doing so



The #1 strategy for CUs will be to educate members and give members the personal choice and control they need to make a decision

How do we get our bang for the buck?

- Whatever we do, our solution needs to be flexible, responsive, and capable of evolving over time as we see how members, credit unions, and regulators respond to future Internet issues
- We need to come up with a strategy—not just a tool, not just a knee-jerk reaction that satisfies our next examiner
- We need to win
- How can we set ourselves apart?

What if we allowed members to build their own Internet branch and manage that branch on a one-on-one basis, personalized to them and their family?

... Introducing PIB *(a work in progress)*



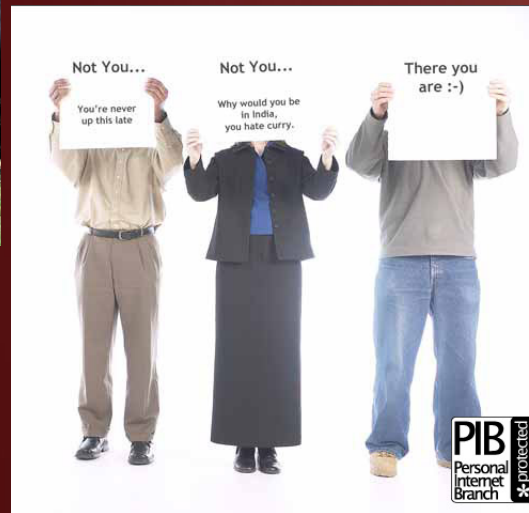
Introducing PIB

- Members want Internet solutions to be intuitive...to be able to predict if it is the member
- PIB goes one step further...it has rules set by the member, and if a user doesn't follow the rules, they can't use It's Me 247: *fraud protection times 2*

Sometimes, it's just not you.



If you're never using CU*[®]@HOME at this time of day, Why let hackers even try?



You're never up this late, so who just logged into your CU*[®]@HOME?



Prevent CU*[®]@HOME access from places you'll never be.



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Your Personal Internet Branch Profile

Login

Username:

Password:


Login

[I forgot my password](#)

[What if I have more than one credit union membership?](#)

Your Personal Internet Branch (PIB) Profile

Welcome! Your credit union makes it easy to control exactly how you want CU*@HOME home banking to work for you...by setting up your own online credit union branch! And you call the shots on how--and when--you want to access your branch!



What is a PIB?

PIB stands for Personal Internet Branch. *Personal*. Unique to you. Special. Like no one else.

What is a PIB Profile?

A set of security controls that define exactly how CU*@HOME will behave for you. To put it another way, it is your way of telling CU*@HOME: "This is who I am and how I like to do things. If someone tries to access my accounts and they behave outside of those rules, it should raise a red flag to CU*@HOME: it's probably not me!"

What kind of security controls can I choose?

Things such as:

- What days of the week and times of the day do you want your branch to be open for business?
- Which PCs should be able to access your online branch?
- What types of transactions can be performed?
- Are there certain types of transactions that should ask for a second, confirmation code?
- Should transfers or other transactions be limited to a certain maximum dollar amount?

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Your Personal Internet Branch Profile

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I Love my PIB!



I make my own rules...I take care of my finances when I want to...I've built my own security level so I'm comfortable accessing my accounts online.

I never knew how easy, safe and fun online banking could be until I built my own personal branch!

Let's Get Started!

To get going quickly with your new PIB profile, choose one of the following "starter profiles" that will give you recommended settings according to your needs and comfort level.

- [Learn about standard security settings.](#)
- [Learn about medium security settings.](#)
- [Learn about maximum security settings.](#)

What if I just want to make a change?

If you just need to adjust a couple of settings in your existing profile, click the "Set Up Profile" button in the top menu now and proceed through the screens until you find the items you want to change. Be sure to click Finish and save your changes when you are done!

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Why would I want to do this?



Choosing a set of security settings makes it fast and easy to set up your PIB Profile. Instead of starting with a completely blank slate, these settings give you a head start, then you can adjust individual settings to your heart's content!

Medium Security Settings

Medium security uses the security features already built into CU*@HOME and allows you access to most CU*@HOME features at any time, on any day. With these settings, when you log in you will use a user name that you define instead of your account number. Also, when logging in you'll be required to provide one additional piece of information in addition to your user name and password.

With these settings we have deactivated the ability to transfer to other member accounts or request a check withdrawal. We also deactivated features that display personal information, including the ability to view cancelled checks or manage your personal information (address, phone, email address, that sort of thing) in CU*@HOME.

You'll still be able to check your accounts, transfer between your own accounts, and open new accounts online just like always. To add one extra layer of security, you'll be required to specify a confirmation code that you will need to enter whenever you perform certain transactions, such as transferring money or accessing the online bill pay system.

We recommend you start with these settings if you:

- Are pretty comfortable with CU*@HOME security features as they are
- Prefer to hide any personal information from being viewed by someone looking over your shoulder (such as if you use home banking from work or a public Internet access site)
- Want to add some additional security but still keep things simple

Remember, this is just a starting point. You can tweak these settings to make your branch work exactly like you want it to work. After all, that's why we call it your *personal* internet branch!

Home Start with these settings

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Who should use this?



If you always log in to CU*@HOME from the same PC, this control may be right for you. If you travel often or log in from public computers such as the library or an Internet cafe, you may not want to use this control.

[How reliable are geo-location tools?](#)

[What if my work and my house are in different cities?](#)

Limiting Access by Geographic Location

Decide where you can be when you log in to your branch.

CU*@HOME uses geo-location technology to determine where your PC is located when you log in, and then allows or blocks access based on your PIB profile. If someone tries to log in from a PC that is in a different country, city, or state, your PIB profile will restrict access. Please remember this is not an exact science. There are conditions that might allow you to use CU*@HOME outside the boundaries you've defined.

If you are connecting from a new location you can attempt to [rediscover your geo-location](#) and save these new settings.

Please answer the following questions:

I would like to limit access to my account by geographic location.
[Tell me More](#)
 Yes No

It appears you are connected from a location in the United States.
This appears to be correct and I wish to limit access to CU*@HOME from only this country.
[Tell me More](#)
 Yes No

It appears you are connected from a location in the region or state of CA.
This appears to be correct and I wish to limit access to CU*@HOME from only this region or state.
[Tell me More](#)
 Yes No

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Who should use this control?



If you always use CU*@HOME from work during the day, or during the early evening at home after work, this control might be right for you.

[What about time zones?](#)

[Will CU*@HOME always be available during the times I choose?](#)

Time of Day and Day of Week

Decide when your branch will be open for business.

Do you want to access CU*@HOME all seven days of the week? Or only on selected days? More importantly, during what hours should your branch be *closed*? (If you know you will be sleeping between midnight and 5:00 a.m., anyone who tries to access your account during that time is probably not you!)

**Disabling by time of day affects all days of the week.*

Please answer the following questions:

Limiting Access by Day of Week

I would like to control the days of the week that CU*@HOME is accessible.

[Tell me More](#)

Yes No

Limiting Access by Time of Day

I would like to control the time of day that CU*@HOME is accessible.

[Tell me More](#)

Yes No

Allow access to my account at these times:

Select the times to enable access.

- Early Morning (12AM - 4:59AM)
- Morning (5AM - 11:59AM)
- Afternoon (12PM - 7:59PM)

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Who should use this control?

If you only handle certain types of transactions in CU*@HOME, this control may be right for you. Even if you'd like to be free to explore any feature that strikes your fancy, you may want to add a confirmation code as extra security for certain types of transactions.

[Why should I block certain features in CU*@HOME?](#)

Limiting Access to Specific Features

Decide what you can do when you visit your branch.

What transactions will be allowed, and what will be blocked? For features you want to use, you can add an extra layer of security by requiring another confirmation code.

Please answer the following questions:

I want to be able to transfer money within my own accounts in CU*@HOME.
[Tell me More](#)

Yes No

Require a confirmation code for this type of transaction?
[Tell me More](#)

Yes No

You will be asked to set up your confirmation code later on.

I would also like to restrict the total dollar amount that can be transferred within my own accounts.
[Tell me More](#)

Yes No

I want to be able to transfer money to other accounts in CU*@HOME.
[Tell me More](#)

Yes No

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[Why should I block certain features in CU*@HOME?](#)

Limiting Access to Other Features

Decide what you can do when you visit your branch.

Will you allow new savings, checking, and certificate accounts to be opened from your branch? Do you want to apply for loans online? Are you comfortable with the ability to see and change personal information such as your address? As before, for features you still want to use, you can add an extra layer of security by requiring a confirmation code.

Please answer the following questions:

I want to be able to Open Savings and Checking Accounts in CU*@HOME.

[Tell me More](#)

Yes No

I would like to require a confirmation code for this type of transaction.

[Tell me More](#)

Yes No

You will be asked to set up your confirmation code later on.

I want to be able to Open Certificate (CD) Accounts in CU*@HOME.

[Tell me More](#)

Yes No

I would like to require a confirmation code for this type of transaction.

[Tell me More](#)

Yes No

You will be asked to set up your confirmation code later on.

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Who should use this control?



A transfer list is required if you want to be able to transfer money from one of your accounts to other member accounts, such as to your spouse or children.

[What if I don't know the correct name?](#)

[Do they have to be members of my same credit union?](#)

Transfer List

Decide where you will be transferring money.

Since you have activated the control that allows you to transfer funds to another member account, you must set up a list of accounts to tell CU*@HOME where money can be transferred. Remember that you can only transfer funds to these accounts. To transfer money from the accounts you would need to log in to those accounts first.

In order to set up the list, you will need the account number and name for the other member(s). The name must be entered *exactly* as it appears on the other member's account statement, so you will need to contact that member for the correct information. You can add as many accounts as you wish, one at a time.

I would like to be able to transfer funds to the following account.

[Tell me More](#)

The type of account I wish to add is a:

[Tell me More](#)

Individual Organization

Account Number:

Member Name:

Add Account

Note: You must match all parts of the member's name exactly as it appears on the member's statement.

Current Transfer List

[Tell me More](#)

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Who should use these controls?



These controls relate to how you log on to your branch (CU*@HOME). Defining a username and activating challenge questions will make it harder for someone else to access your branch by adding more layers of security when you log in.

The "Register Your Computer" control might be right for you if you always access CU*@HOME from the same computer. If you log in to CU*@HOME from the library or another public computer, you should not use the registration control.

CU*@HOME Login Controls

Decide how you will unlock the door to your branch.

Some people do not like to use their credit union account numbers on the Internet. Your PIB profile lets you set up a username that can be entered in place of your account number when you log in to CU*@HOME. Besides adding an important security feature, this can be convenient if you have trouble remembering your account number!

Remember that this is a different username than the one you use to log in to your PIB profile.

I would like to use a Username instead of an account number to log in to CU*@HOME.

[Tell me More](#)

Yes No

Knowledge-based Challenge Questions

When you enable this feature, a series of questions will be generated from the account information that is on file at the credit union. These questions will be easy for you to answer, but difficult for anyone else. You will be prompted to answer these questions in addition to your username and password when you log in to CU*@HOME.

I would like to require challenge questions when I access CU*@HOME.

[Tell me More](#)

Yes No

Register Your Computer

Done Local intranet

CU*Answers :: PIB :: Email Activation Key - Microsoft Internet Explorer

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Personal Internet Branch

Home **Currently Setting Up Profile** Enter My Activation Key Register My PC View Activity Log Options Logout



These changes will take effect after you enter the Activation code that you will receive via email.

Your PIB Profile Changes Need to be Activated

To activate:

To activate the changes you've just made to your PIB Profile, click the Save Changes button below. An email containing your Activation key will be sent to the email address on file at the credit union. Depending on your ISP, this email may take up to 24 hours to deliver.

Once you receive your Activation Key, return to this website and select "Enter My Activation Key" from the top menu. **You must do this within 72 hours.**

Step 6 of 6 < CU*@HOME Login Options Save Changes

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Your Personal Internet Branch Profile

Home Set Up Profile **Enter My Activation Key** Register My PC View Activity Log Options Logout



An activation key helps ensure that someone else cannot change your PIB profile without your knowledge. The email will be sent to the email address already on file at the credit union. That's why it is very important to let the credit union know if you change your email address!

Activate Your Changes

In order to activate your PIB, you need to enter the Activation Key that was emailed to you. It may take up to 24 hours after making changes to your PIB profile in order for the email to be sent. If you have not received your Activation Key, please remember to check your Spam Filters or Junk email box. Sometimes these types of emails get identified incorrectly.

Notice

If you received an Activation Key, but did not request one, please contact the Credit Union immediately.

Submit my Activation Key

Activation Key:

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Address <http://webqc01.cubase.org/pcb/Secure/DeviceRegistration.aspx>

Your Personal Internet Branch Profile

Home Set Up Profile Enter My Activation **Key** Register My PC View Activity Log Options Logout

Who should use this control?



This feature might be right for you if you always access CU*@HOME from the same computer or computers (such as from home and when using your PC at work). If you log in to CU*@HOME from the library or another public computer, you should not use this control.

Register a Computer to Access Your Branch

If you have activated the control that says that a computer must be registered in order to access your branch, you must register each computer separately. This can be done here, or you can also register a computer later while logging in to CU*@HOME by answering a series of challenge questions.

This should not be used on public computers!

- Internet Cafe
- Public Library
- Any computer used by many people.

This computer is not currently registered.

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Your Personal Internet Branch Profile

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The PIB Profile activity log shows a record of changes to your profile, and also keeps track of whenever someone accesses your branch (logs in to CU*@HOME). If an unauthorized person attempts to access your branch or perform a blocked transaction type, this log will show what they tried to do and how they were stopped. If you are concerned about any of the activity shown here, contact the credit union immediately.

Activity Log

The following is a list of events which have occurred with your PIB.

Description	Date	Time
Your PIB profile has pending changes. You will receive an email with activation instructions.	10/3/2006	1:33:06 PM
Your PIB profile has been accessed.	10/3/2006	1:24:43 PM
Your PIB profile has been accessed.	10/3/2006	1:23:08 PM
Your PIB profile has been accessed.	10/3/2006	09:11:13 AM

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Local intranet

CU*Answers :: PIB :: Password Change - Microsoft Internet Explorer


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Your Personal Internet Branch Profile

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Why would I want to do this?



You should change your PIB Profile password immediately if you think someone has guessed your password.

Change Your PIB Profile Password

This feature lets you change the password that will be used to access your PIB profile in the future. Remember that this is a different password than the one you use to access your actual branch (CU*@HOME). This is the password you use to update your PIB *profile* information.

Change Password

Current Password:

New Password:

Confirm Password:

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Done Local intranet

CU*Answers :: PIB :: Disable PIB - Microsoft Internet Explorer


File Edit View Favorites Tools Help

Back Search

Your Personal Internet Branch Profile

Home Set Up Profile Enter My Activation Key Register My PC View Activity Log **Options** Logout

Why would I want to do this?



If you are not comfortable allowing changes to be made to your PIB profile online, you can deactivate this online feature. This disables the username and password used to access this PIB *profile* only (not the name and password you use to access CU*@HOME).

Online Access to Your PIB Profile

After you have set up your PIB profile the way you want it, you can use this feature to disable future access to your profile via the Web. **All future changes to your PIB profile must be completed in person at a credit union branch.**

Notice

If you change your mind later, you must contact a credit union representative directly in order for you to access your PIB profile online again. If you've made any changes to your profile in this session, you must first save your changes. After you receive your activation key via email, return here to activate your profile. Then use this feature to disable future access via the web.

Disable Online Access to Your PIB Profile

I would like to disable all changes to my PIB profile via the web. I understand that disabling this will not affect my access to CU*@HOME.

Disable PIB Web Interface

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Local intranet

Layering Our Options (yes, you have options)

Develop and offer a strong 2-factor authentication option
for the 5% community

Energize and engage the 20% community by getting them to
configure their individual PIB

Set the credit union PIB profile for the 75% community

Activate a PIB strategy

Develop a security awareness education program
for Internet members

Develop a strong password and transfer control

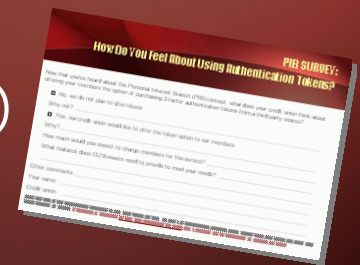
What does It's Me 247 allow your members to do?
(configure the CU offering to all members)

Does your credit union even offer It's Me 247?

Layering Our Options (yes, you have options)

- What are we going to have to do in the next several months?
 - Complete mods to current password and transfer control options
 - Develop CU*BASE PIB controls and credit union strategies
 - Develop a new PIB web solution for members to use
 - Complete modifications to It's Me 247 to work with both the CU's default PIB and member-elected PIB profiles
 - Expand It's Me 247 education features to make the member aware of the risk and credit union solutions
 - Develop collateral materials (posters, statement inserts, web page content) for rolling out the PIB
 - Develop the 2-factor token relationship for our 5% community (beyond the tool, all the way to the member)

PIB is priority #1 for the balance of 2006



Conclusion

- We believe we have a solid plan and a definite direction that will not only satisfy security concerns but also will lead to a unique credit union offering that allows members to see the one-on-one value in doing their financial business with you
- There are two ways to look at this: As a potential roadblock to our future, or as an opportunity to shine with a unique member opportunity