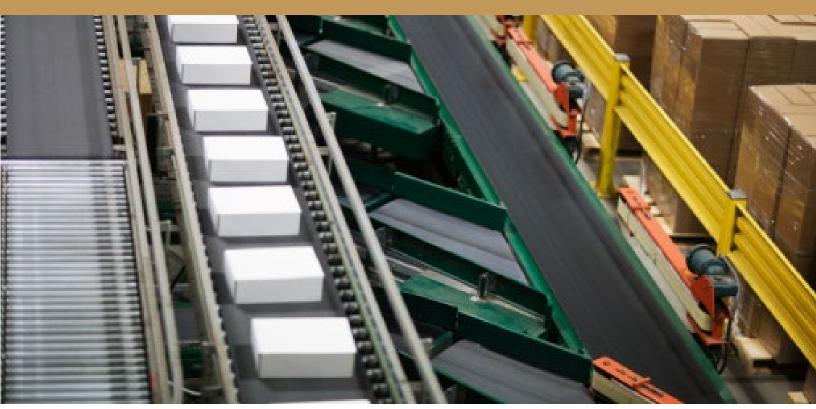
THE SOFTWARE DEVELOPMENT LIFE CYCLE

S D L C

Understanding the CU*Answers Development Factory





Revised: August 1, 2024

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A brief introduction of why the SDLC document was written and what it's intended to accomplish from a big-picture standpoint.

THE CU*ANSWERS DEVELOPMENT FACTORY

The Software Development Life Cycle (SDLC) documents the rules and procedures for approving, tracking and communicating the status of software development as it moves through the CU*Answers production "factory" – from initial request all the way through final implementation for clients.

The SDLC slows us down so we can respond more quickly...and more effectively

The rules and guidelines in the SDLC are intended to force the organization to slow down and make prudent decisions about how CUSO resources should be spent on software development. At the same time, as a client-owned cooperative we are driven by the goals, agendas, and challenges of our clients, and as such must remain flexible and responsive to their changing needs. Rather than adding layers of bureaucracy or roadblocks, the SDLC provides a solid, predictable foundation which actually makes it easier for us to flex with our clients and the market while still remaining true to the standards they've come to expect.

With greater transparency comes greater responsibility

We welcome the scrutiny of our clients and even the general marketplace when it comes to the projects being pushed through our factory. But with that transparency comes a greater need to ensure every project is thoroughly researched and accurately stated so that our intent is clearly understood. On occasion a good idea may be rejected and the originator asked to submit it again with a more concise description or more complete research.

Justifying the right to say No, so that we can say Yes more often

One of the biggest responsibilities we have as a CUSO is to be good stewards of our clients' investment. By using a proven set of guidelines in our decision-making processes, we help make sure we spend our resources on the right things.

Today's No might just be tomorrow's Yes...if we're willing to do the work

While denying a project lets us focus our resources on the right things for today, a no doesn't necessarily mean no *forever*. But even when a no really means, "not right now," the sheer volume of work flowing through the factory means we need the process to help us remain focused on today's priorities. That means we do not keep a backlog of every project idea that has ever come up to be revisited later. Denied projects are periodically purged, and in order to be resurrected a client or other stakeholder must be willing to start all over again and make a new case. Yes, it takes a lot of time and effort to do the research, develop a design, and do the due diligence for an idea. But if it's not worth doing that work, then perhaps the project isn't worth doing at all.

A hallway approval doesn't take precedence over a formal one

Requiring the SDLC rules to be followed in every case, for every project, means that an off-the-cuff decision made during a chance conversation will still receive the same due diligence as any other project.





DEVELOPING SECURE SOFTWARE

At CU*Answers we not only develop software that our clients want and need, but we do so in a way that keeps security top of mind. Protecting our clients' valuable data, our network, and our software assets is critical to our ability to serve clients today and in the future. As you will see, this security focus shows itself in many areas of our software development life cycle, starting as early as when the project is still a kernel of an idea waiting to be designed.

Monitoring software development projects via a security lens – starting early in the process and continuing all the way through programming and testing – ultimately saves both time and expense, and allows us to build safer, more resilient, and more effective software solutions for our network.



This security focus includes:

- Ensuring a security code review is completed with a focus on best practice and security standards.
- Scheduling and completing a Security Project Review. Ensuring all signoff forms are attached to the project via the Track*IT project tracking system.
- Building commitment across the CU*Answers leadership to software security and secure development.
- Establishing clear expectations and standards for integrating security into the software development life cycle and establishing processes for achieving them.
- Establishing clear policies, as well as processes for elevating and accepting exceptions to those policies based on risk analysis.
- Ensuring every individual involved in software development and software security is aware of his or her role and is prepared to perform it.
- Identifying metrics to enable consistent evaluation and adjustment of secure development lifecycle processes to improve outcomes and integrate lessons learned.

For more details about our secure software development process, look for this icon throughout the SDLC. Also refer to the details starting on page 27.



The function and responsibilities of the Product Team and its role in the development process. Rules for how development teams get mainstreamed into the SDLC flow.

WHO MANAGES THE CU*ANSWERS DEVELOPMENT ASSEMBLY LINES?

Unlike a traditional department or specific group of staff, software development at CU*Answers is driven by a network of leaders from many areas of the organization as well as external players from partners to clients and even credit union members.

The Product Team

Driving the day-to-day work is the Product Team. This team consists of the key leaders for the development factory – meaning all of the different phases in the development of software tools, from design and programming to QC and documentation. Our planning includes CU*BASE, EFT, online and mobile banking, imaging, audio response, and other ancillary product lines. (More on that in a moment.)

The Product Team meeting schedule is outlined on the Product Team page of the CU*Answers Nucleus site.

The Product Team meets on a regular basis to discuss project status, deadlines and contractual commitments. A broad spectrum of views are represented on this team, including product design, technical development, documentation, testing, management, operations, and client support. This team is responsible for making decisions and maintaining the official Release Schedule, which is published online weekly to communicate up-to-date release target dates to development teams and clients.

Quarterly Strategic Planning

To ensure that our development efforts are overseen by the organization's executive management, on a quarterly basis all development teams participate in Quarterly Team Strategic Planning sessions. These are attended by the programming team leader as well as the CEO, EVP of Software Development, EVP of Client Experience, VP of Quality Control, VP of Management Services, and other interested parties as appropriate.

The purpose of these meetings is to review the team's priorities and status for the current and coming calendar quarters. These meetings are useful for keeping the CEO and other leads apprised of the team's progress and challenges, and for making sure everyone is on the same page as to what is being worked on and what's next on everyone's plate. These meetings often include preliminary discussions and planning for major design changes coming down the road.



Internal Auditing

In keeping with our security focus, the CU*Answers Internal Auditor also plays a role in monitoring software projects from a security point of view, determining if additional code or project reviews are needed before projects can be approved or moved to the next phase in the cycle. See Pages 7 and 26 for more details.



Day-to-Day Administration

The EVP of Software Development and VP of Quality Control are responsible for ensuring that a status report on any individual project is readily available to CU*Answers staff. This is facilitated by special tracking software referred to as **Track*IT**. (See also Page 30.)

STANDARDIZING OUR ASSEMBLY LINES

Request Approval Design Development Testing Slate for Release Beta Documentation Implementation

Much like a manufacturer that has multiple assembly lines for different products, the CU*Answers software development factory has several distinct yet interrelated assembly lines for the many software products we produce. Tasks, timelines, and techniques do vary from one product to the next, but they often intertwine and share resources.

In the past, the SDLC focused primarily on the management of our core copyright, CU*BASE®, and the GOLD user interface layer. Over time ancillary products such as **It's Me 247** online banking and CU*Talk audio response, Imaging Solutions, and **BizLink 247** business online banking have been pulled under the same umbrella.

We are aggressive in merging new properties and important assets, both technical and people, into SDLC policies so that the leaders of these new efforts are encouraged to buy in to the larger goals of the CUSO. Merging these leaders and ideas in and bonding them more closely with the Product Team encourages the next generation of leaders to feel a sense of ownership for the overall direction of the organization.

Fledgling Product Lines and the SDLC

New efforts that start out small, in order to develop new capabilities for the organization, may one day become the foundation for expanding our current ones. Recent examples include Analytics Booth and products from the Mobile Technologies Group (MTG).

As new product lines emerge, it's expected that there will be an initial incubation period during which the formality of SDLC rules are not possible and in fact might hinder the evolution of an initiative that's still in its infancy. At the same time, being able to adapt the tried-and-true techniques from SDLC will relieve the burden of having to reinvent the wheel when it comes to getting the new assembly line up to full speed. Therefore, Product Team leaders, along with Executive Management, are responsible for monitoring new initiatives as they develop and making the decision about when these new efforts will formally begin being incorporated into the SDLC guidelines and auditing processes.

The first step is for the EVP of Software Development to incorporate the new team into the Quarterly Strategic Planning sessions. During those sessions a decision will be made as to the point at which the new product or team will launch the formal process to be integrated into the SDLC.



The meat of the policy, outlining guidelines for each of the tasks in the assembly line. These rules allow for decisions to be made prudently and consistently, and for the decisions to be documented so the thought process can be understood by an outside observer.

PROJECT CREATION/SUBMISSION

Request Approval Design Development Testing Slate for Release Beta Documentation Implementation

What happens during this stage

Who is responsible
Controls for this stage

Project is created in the Track*IT system which initiates the SDLC workflow

Projects can be created by most data center employees (see Appendix B)

Projects added to Track*IT are subject to the rules outlined in the instructions posted on the CU*Answers Nucleus site. Urgent projects may be fast-tracked through the process; see Pages 7 and 21 for rules about escalating high-priority projects.

Where to learn more

Project Requests: Where do the ideas come from? (Page 18)

Instructions for using Track*IT are available from the Product Team Nucleus page

Project Entry/Submission

Following initial troubleshooting and investigation¹, a project is generated via Track*IT by a CSR or other staff member. The originator is responsible for verifying that:

- The issue is valid and can be recreated or backed with documentation showing the problem.
- The issue cannot be resolved with routine assistance from CSR staff.
- The issue has not already been entered into the database if a similar project already exists, the new client name should instead be added to the existing project for notification of status changes.
- Online help or other reference material has been reviewed to see if an explanation of the issue is already documented.
- Identify if a third-party vendor is involved in the project, especially a new vendor relationship. (Also see Page 20.)

General information regarding client contact information and details about the reported issue or requested enhancement are required when originating the project in the database. A project number is assigned by Track*IT. The CSR will provide this number to the requesting client to allow the client to track the project status going forward. (See Page 32.)

¹ Refer to the "Defining the Work that the Factory Produces" section (see Page 12) for guidelines as to what types of requests should become an official project in the first place.

PROJECT APPROVAL

_	Request	Approval	Design	\geq	Develop- ment	Testing	\geq	Slate for Release	\geq	Beta	\geq	Docu- mentation	\geq	Imple- mentation	

What happens during this stage The submitted project is approved by one or more authorized staff, flowing

through a standard approval matrix according to project type

Track*IT Administrator Who is responsible

Controls for this stage Approval is required to be logged via Track*IT for all projects, except for CU Conversions/Mergers and Custom Forms (these have a separate client

bid/approval mechanism), as well as GOLD Screen Modifications.

Timing rules Final approval must be logged within 30 business days of project submission

Where to learn more Project Approvals: What makes it to the assembly line? (Page 20)

Initial Triage

Once a project is submitted, it begins moving through the default approval workflow assigned according to project type, as explained below. For most² project types, someone in the Quality Control team will perform an initial triage to ensure that the project has been properly categorized, to monitor for and escalate time-sensitive projects and warranty issues that require urgent attention, and for other administrative review.

Security Assessment

For all project types that add in new functionality or provide connection to a new 3rd party vendor(s), we have ensured that our Internal Auditor is added to our approval process to reduce the number of vulnerabilities in released software, to reduce the potential impact of the exploitation of undetected or unaddressed vulnerabilities, and to address the root causes of vulnerabilities to prevent recurrences. See Page 26 for more details.

Fast-Tracking a High-Priority Project

If the initial triage determines that a project should be fast-tracked due to special urgency, the SDLC approval process and other workflow stages will still apply, but the Track*IT Administrator will expedite all of the tasks. In some cases such as issues involving data integrity or direct member impact it may be necessary for development work to begin concurrently with the formal approval process being completed in Track*IT.

For more details on the process of fast-tracking a project, refer to "Project Approvals: What makes it to the assembly line?" on Page 20.

Standard Approval Workflow

Track*IT is set up to move a project through the approval list one person at a time, with approval required by each designated name, in order, before the project is passed on to the next person in the list. (It is not possible to bypass a name nor to change the order of the names in the list for an individual project.) A project must be marked as approved by every name in the Track*IT approval list before work can commence and development time can be logged. If additional subject-matter experts are added by anyone on the default approval list, then those approvals are also required.

For more details on what is involved in approvals, including timing benchmarks used in decision-making, refer to "Project Approvals: What makes it to the assembly line?" on Page 20.

² Some project types are automatically routed into the approval workflow, bypassing this initial QC triage. Examples include new client conversions/mergers and custom forms.

Final approval must be logged within 30 business days of project submission. The following chart outlines the default approval flow that will be assigned automatically to new projects as they are submitted:

	Project Type ³	Default Approval Workflow
	Architectural	VP Quality Control → EVP Software Development
	Card Conversion	Track*IT Administrator \rightarrow CEO
	CU Conversion/Merger	Track*IT Administrator
	Custom Forms	Track*IT Administrator
NEW	Custom Request	Track*IT Administrator → Internal Auditor → VP of Management Services ⁴ → Programming Team Leader
NEW	Data Center Infrastructure	VP Operations → VP Operations Programming → EVP Software Development
NEW	Operations Program Change	VP Quality Control \rightarrow VP Operations Programming \rightarrow EVP Software Development
	Generic Forms	VP Quality Control → CEO
	GOLD Screen Modification	VP Quality Control
	Program Modification ⁵	VP Quality Control \rightarrow EVP Client Experience \rightarrow EVP Software
and the same of th		Development
NEW	Software Enhancement	VP Quality Control \rightarrow Internal Auditor \rightarrow VP Management Services \rightarrow EVP
SALAN		Software Development \rightarrow CEO \rightarrow EVP Client Experience
	Warranty Adjustment	VP Quality Control \rightarrow EVP Client Experience \rightarrow EVP Software
		Development

To ensure projects move through the queue in a timely fashion, approvers can also designate authorized **proxy** representatives who are authorized to log approvals in their place. This might be a short-term arrangement, such as to fill in during a vacation, or longer-term as someone prepares to transition another leader into the mix as part of a succession planning process.

Accountability in the Approval Process

Because of the way the Track*IT system requires approvals to be granted in a certain order, the ultimate accountability for approval usually falls to the second and in some cases third person on the default approval list. This allows for an initial administrative triage, simply to ensure that projects are being created and routed properly, with ultimately accountability for the decision falling on someone with appropriate authority to make decisions about allocating resources for development.

Approvals and Resource Estimates from Subject-Matter Experts (SMEs)

In addition to the default approval list, additional subject-matter experts can be added at any point during the approval process, by anyone on the approval list as they review the project. For example, if the EVP of Client Experience would like someone from the Lender*VP team to review and approve a project request that involves lending software, they can add that person's name to that specific project and approval must be logged by that person before it proceeds to the next approver in the list. In addition, programming team leaders may be added to the workflow to assist in estimating programming hours and other resource needs to assist other decision-makers when logging their approvals. Although no special permissions are required to log approval for a project that has been assigned this way, the person must at least have basic access to the Track*IT system. (See Appendix B for a sample of Track*IT users throughout the organization.)

³ See Page 16 for an explanation of these project classifications.

⁴ See Page 21 for details about evaluation of custom and software enhancement projects from a business perspective, particularly when a 3rd party vendor relationship is involved.

⁵ Although the CEO is not formally in the workflow for approving Program Modifications, a weekly summary of all projects submitted the prior week is sent to the CEO for review and comment.

Project Denials

If any person in the list marks the project as denied ("disapproved"), then the workflow ends and the project will not be routed to any of the remaining names on the list. In situations where one of the approvers is unsure whether or not to grant final approval, a comment is logged along with the approval and the project continues on to the next name in the list (might be an added subject-matter expert), explaining that approval is tentative based on agreement by others on the approval list. This ensures that projects can be reviewed by other parties even if one of the approvers has reservations about granting final approval and needs additional input to make a decision.

Approvals for Research Only

This is a special type of approval intended to give us a better way of handling and tracking large-scale projects that require intensive design and feasibility study before the CUSO commits to the investment in development. An approval for research means that a specified amount of research and initial design work must first be completed, and that the work will not be assigned for development until the results of that research have been evaluated by appropriate Product Team leaders. See also "Design Specifications" below and "Approvals for Research" on Page 22.

For examples of research projects and more details about this special approval type, refer to "Project Approvals: What makes it to the assembly line?" on Page 20.

Approvals at Capacity

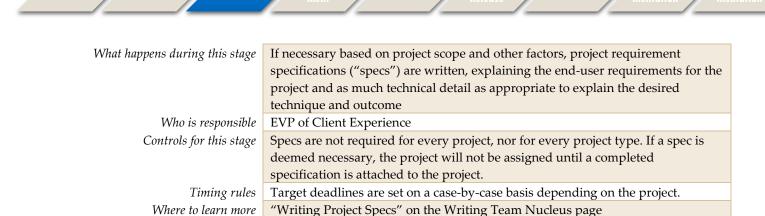
This is a special approval workflow used by the EVP of Software Development and the CEO to assist with resource allocation and more effective tracking of major development projects. Although it can be used with any project approval, the workflow currently is applied only to software enhancements that have an estimated development time of 100 hours or more. Here's how it works:

When reviewing the project for approval, the EVP of Software Development looks at current resource allocation to estimate if it will be feasible to begin work on the project within the next 90 days. If not, the project is marked approved but "at capacity." When the project is reviewed by the CEO, Track*IT will prevent the project from being approved and instead offer three choices:

- Discuss and prioritize This will prompt the EVP of Software Development to discuss with the CEO and other
 programming team leaders a possible reprioritization of other projects already in the queue in order to allow the
 new project to proceed.
- **Approve for research only** This allows the project to be placed into the queue but with a different expectation as to how quickly it can be assigned and what progress will be made. A programmer may be assigned for preliminary research or to make recommendations on a plan of attack, or perhaps to work with the Writing Team or other experts to develop more detailed specifications. (*See also "Approvals for Research" on Page 22.*)
- Disapprove The CEO may choose to simply disapprove the project due to availability of programming resources.

The purpose of this tool is to drive the conversations about resources and prioritization earlier in the process, during the approval stage. The goal is to better manage expectations and prevent key projects from languishing in the queue with no forward momentum.

DESIGN SPECIFICATIONS



A written outline explaining the project requirements and more detailed instructions may be necessary before the project can be assigned to a developer. The need for specs is determined on a case by case basis and depends on the product line,

"User Interface Style Guide" on the Programming Nucleus page

complexity of the project, the need for client and market input, and other factors. Any project can be routed to this stage by any of the authorized approvers or based on the evaluation by Product Team members.

Technical Specifications

NEW

For software enhancements or projects that employ new functionality, technology or build new database structure, once preliminary specifications have been written which document the overall aim, configuration and

workflow changes, and other project requirements, Product Team leaders will evaluate and the project may also be assigned to a programming team lead or other expert to incorporate additional technical specifications related to the methodology to be used in the actual development process.

Both the general project specifications and these additional technical specs help to ensure consistency in coding and enduser experience, and adherence to development guidelines and standards.

Specifications for Security Protocols



As part of the specification-writing process, designers work with subject-matter experts, business developers, and other CU*Answers leaders to evaluate the project from a security perspective, including noting whether special security protocols or requirements will need to be used or built with this project. Page 26 for more details.



For a discussion of our spec-writing

incorporated into the design process,

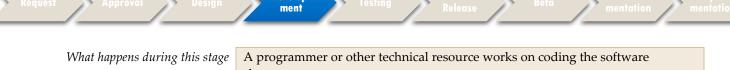
refer to "Project Specifications: Getting Our Clients' Vision Into Our Products" on

client input is

process and how

Page 22.

DEVELOPMENT



Changes
 Who is responsible
 EVP of Software Development
 Projects are assigned by Programming Assistant Managers, overseen by the EVP of Software Development.⁶
 Timing rules
 If work does not commence within 12 months after approval (or 18 months if design specifications or other research are required), then before the programmer begins working on the project, an evaluation should be scheduled with appropriate Product Team leaders.⁷
 Where to learn more
 "User Interface Style Guide" on the Programming Nucleus page

"Programming Standards and Guidelines" on the Programming Nucleus page

During the programming stage for all projects other than major design changes, the programmer completes the coding,

"Developer Guidelines" on the Programming Nucleus page

documenting the changes that were made and submitting the project for testing. In some cases a Project Review session may be necessary to allow subject-matter experts and other interested parties to give additional feedback on the software and add any changes needed prior to program completion.

For details about CU*BASE development standards refer to the "User Interface State".

All programmers are required to submit code changes to their supervisor or other designated team leader for **Code Review** prior to the project being submitted to QC. This entails reviewing the implementation sheet and comparing to the project library, ensuring the programs listed on the implementation sheet match what's in the

For details about CU*BASE development standards, refer to the "User Interface Style Guide" and "Developer Guidelines" documents on the Programming Nucleus page. For more details on Project Review Sessions and how they are scheduled, refer to the REACH presentation available on the Product Team Nucleus page.

library as well as evaluating source changes against current programming standards. The code reviewer will always be someone other than the person who did the coding changes. Refer to details in the "User Interface Style Guide" and "Developer Guidelines" documents on the Programming Nucleus page.



For projects that require an additional **Security Code Review** (see Page 28), this will be initiated after the standard code review and will be performed with a specific eye toward ensuring we are developing software that meets security standards:



- **Implementing appropriate controls** such as access controls and input validation, to help prevent attacks and protect sensitive data.
- **Following secure coding practices** such as using static analysis tools and following coding standards, to ensure that the software is developed with security in mind.
- **Conducting regular security code reviews** to ensure we identify potential vulnerabilities and confirm that the code is of high quality.

⁶ If appropriate, an evaluation is done against FASB guidelines for capitalization of project costs; refer to the "Capitalized Improvements (FASB)" section (see Page 16) for more details.

⁷ Refer to the "Guidelines for Making Approvals" section (see Page 17) for more details.

For projects where **biometric data** may be captured or stored, refer to the "Checklist for Deploying Projects that Capture Biometric Data" policy on page 28 for special procedures related to analyzing and confirming adherence to current privacy and security guidelines.



Artificial Intelligence

AI also brings new considerations to software development, along with new security challenges. AI software often integrates multiple software components, frameworks, and platforms, potentially introducing new risk with each additional element. Moreover, AI generally must ingest and process enormous data sets, introducing risk through the exposure of the data itself. Combined, these risks demonstrate the importance of software security for AI products.

CU*Answers will identify any project that uses AI to generate code, components, frameworks, or platforms, and implement a Security Project Review. See Page 26 for more details.

QUALITY CONTROL TESTING



What happens during this stage Software changes are tested to ensure they match the original project intent and follow current development standards Who is responsible VP of Quality Control Controls for this stage All projects must either have a QC sign-off or completion of an approved alternative testing process. Timing rules Target deadlines for testing are determined by the release scheduling process (see next stage). "CU*BASE Software Testing and Quality Control Procedures" on the Quality Where to learn more Control Nucleus page "Quality Control Design: CU*Answers QC Design and Process" on the Quality Control Nucleus page

Although not every product line is tested by the official Quality Control team, all software products that are covered by the SDLC must include a QC testing component that is approved by the VP of Quality Control and Product Team

leadership. Although programmers are expected to thoroughly test their code before submitting it for testing, someone other than the programmer will be required to perform official QC testing and sign-off.

For projects involving changes to our core software tools (CU*BASE, It's Me 247 online and mobile web banking, CU*Talk audio response, or related software products that interface with these), the Quality Control department assigns a QC Tester to test the changes against specifications, in accordance with the CU*BASE Software Testing and Quality Control *Procedures.* Any defects found are returned to the assigned programmer for changes until the tester signs off with their testing report and submits the project to the VP of Quality Control. During this stage additional Project Review sessions may also be scheduled, as

For complete details about the QC team, additional participants in the testing process, traditional and non-traditional QC testing methods, decision factors used to determine test methods, and tools used for QC testing, refer to the "Quality Control Design: CU*Answers QC Design and Process" document.

needed.

The Quality Control team also has implemented a standard procedure related to projects or software applications that require a Security Project Review (see Page 28). This procedure, which is available on the Quality Control Nucleus page, explains the additional evaluation, general testing, and special regression testing that is included on projects identified as falling under this designation.



SLATING FOR RELEASE



What happens during this stage

During this stage a decision is made on a date when the project will be moved from a development environment and become part of live production

Who is responsible

VP of Quality Control, EVP of Software Development, EVP of Client Experience, and other key Product Team leaders

Where to learn more

"Release Schedule" (published on the <u>Release Planning page</u> of our website; available internally from the Product Team and Quality Control Nucleus pages)

During their weekly meetings, the Product Team reviews projects that are nearing completion and makes decisions on targeted release dates, documenting these decisions on the official Release Schedule where applicable. Smaller, lower-

impact projects can be organized for release on demand, in cases where advance notification to clients is not needed.

For more details about the decision-making process used by the Product Team and other key leaders when scheduling project release dates, refer to "Implementation Planning: How are deployment decisions made?" on Page 25.

BETA-TESTING IN THE FIELD

What happens during this stage	Software changes are deployed in a limited, controlled environment to selected
	clients, who agree to work with our teams to test the changes and give feedback
	on the enhancements
Who is responsible	VP of Quality Control or designated project leader
Controls for this stage	Not all projects require beta-testing; this determination is made by the Product
	Team. For major releases where CUs receive CollabRebate rewards for beta-test
	participation, CUs must agree to abide by specific requirements for using the
	tools and documenting feedback.
Timing rules	Target deadlines vary for each release, but in general a normal beta-test period
	begins 6 weeks prior to the target release date.
Where to learn more	<u>Jump in the Beta Pool page</u> on our website
	Active Beta Study Groups page on our website
	"Developer Guidelines" on the Programming Nucleus page
	"Release Schedule" (published on the Release Planning page on our website;

At its weekly meetings the Product Team makes decisions about projects that are extensive or high-impact enough to warrant beta testing in the field with credit union clients. Not every project will require beta-testing. The Product Team

pages)

also determines which beta-test will be used, if any: normal beta as part of a major release, passive-only beta, active (live) beta, or special beta for a specific CU.

For details about beta tests and deployment methods, refer to "Implementation Planning: How are deployment decisions made?" on Page 25.

available internally from the Product Team and Quality Control Nucleus

DOCUMENTATION/CLIENT COMMUNICATION

What happens during this stage	Documentation is written to explain the changes to clients and support staff
Who is responsible	EVP of Client Experience or designated project leader
Controls for this stage	All software changes must be documented and clients notified via an
_	appropriate communication channel.
Where to learn more	"Writing Team Guidelines" on the Writing Team Nucleus page
	"Writing Team Demystified" on the Writing Team Nucleus page
	Release Summaries page on our website
	<u>Client News</u> page on our website

One of the tenets of the relationship CU*Answers has with its clients and partners is that *we communicate*. There are several avenues by which those clients are notified about software changes, such as release summaries, alerts, and broadcast emails. The method used for a particular project is determined by the Writing Team or appropriate project leader with input from participants at weekly Product Team meetings.

Another tenet is that we document our tools. This documentation represents the warranty we present to our clients and the marketplace about how our software tools and services will perform, and the standards to which we agree to be held. This information is delivered via many different mechanisms depending on the audience, whether credit union end-user, other technical teams, partner organizations, or third-party vendors. The method used for a particular project is determined by the Writing Team or appropriate project leader with input from participants at weekly Product Team meetings.

For details about the roles the Writing Team plays throughout the entire software development process, refer to the "Writing Team Demystified" document, available on the Writing Team Nucleus page.

Documentation

IMPLEMENTATION/FINAL RESOLUTION

What happens during this stage Software is moved from the development or beta-test environment into production Who is responsible EVP of Software Development and appropriate Programming Team Leader(s) or other authorized users, according to the specific software product The development team for each software product selects one or more team Controls for this stage members who are authorized to implement software changes. Each team is responsible for documenting their implementation rules and procedures for auditing purposes. Documentation is also required showing what is deployed during a release. Project documentation is archived 90 days after implementation. Archived Timing rules project information is retained for at least 12 months. Where to learn more "Developer Guidelines" on the Programming Nucleus page (for the CU*BASE

There is at least one designated team leader in the Programming department who is authorized to handle implementation for CU*BASE releases. Teams for other products (MTG, Imaging Solutions, Analytics Booth, etc.) have

software product)

their own procedures and may even use a team approach to handle implementation duties. Each team is responsible for documenting their procedures as well as which team members are authorized to move software to a live production environment.

As part of the implementation process the person handling deployment is responsible for documenting what is deployed. This may be by project or even more granular if appropriate (such as the method used for CU*BASE releases which documents specific programs that are deployed). Information about procedures, requirements, and authorization for performing deployments is outlined in the "Developer Guidelines" document on the Programming Nucleus page.

For details about change control procedures for implementing CU*BASE software changes, refer to the "Developer Guidelines" document on the Programming Nucleus page, as well as the "Technical Policy Manual" on the Policies Nucleus page.

Implementation

For details about beta tests and deployment methods, refer to "Implementation Planning: How are deployment decisions made?" on Page 25.

When a project is deployed, the Track*IT system is used to log when and by whom the software was implemented. After implementation, the Track*IT Administrator verifies that appropriate tasks have been completed and updates the project to the appropriate resolution status. Project documentation is archived 90 days after implementation, and archived information is retained for at least 12 months.

Should the implementation of a CU*BASE project cause unanticipated problems in the production environment, if appropriate project changes may be **rolled back** according to procedures documented in the "Developer Guidelines" document, available on the Programming Nucleus maintained by the Programming Team. Online banking and other ancillary products will also have their own documented rollback procedures maintained by that individual Programming Team.

DEFINING THE WORK THAT THE FACTORY PRODUCES

Expanding on the more complex concepts from the previous section. A big-picture overview of how project ideas make it into the development pipeline in the first place. Techniques we use to organize the considerable volume of projects that are managed via the SDLC development queue.

PROJECT REQUESTS: WHERE DO THE IDEAS COME FROM?

There are many factors that control what projects can make it past the "what an interesting idea" stage into actual design specifications and programmer development. Key drivers that influence these decisions (in no particular order):

Business Drivers	Event Drivers	Client Drivers
Professional Services that push software development	Annual or periodic events that prompt changes in software	Client-related needs that push software development
 Xtend SRS Bookkeeping 	 Leadership Conference 	Industry and regulatory
Audit Link	CEO Strategies	directives
 Lender*VP (including Lender 	Conversations On	 Sales contacts and contractual
RE, Collections, Retailer	and other collaboration	obligations
Direct, etc.)	groups	Custom work
 Xtend (including Member 		 Changes by 3rd-party vendors
Reach, Shared Branching,		 Direct requests from clients,
Call Center, etc.)		including via Idea Forms ⁸ ,
 Earnings Edge 		focus groups and other special
 Imaging Solutions 		events, training contacts, daily
 SettleMINT EFT 		client service interactions, etc.
 OpsEngine 		

The Custom Request Process

CU*Answers clients periodically submit requests for special development work related to their CU*BASE membership data. Although these projects can take many different forms, we generally refer to them as either "custom programming" or "special jobs." Examples include a one-time exchange of data with a third-party vendor, the development of new functionality or a unique new tool for CU staff and members, interfaces to check imaging vendors, custom branding for online and mobile products, Retailer Direct interface projects, and the like.

These types of projects are generally billed to clients on either an hourly or per-project basis according to a number of factors. The <u>Initiating a Special Project Request</u> page of our website describes the standard procedure we use to evaluate, price, and process most of these types of requests, from the original inquiry by a client through the research, bid, and approval process, all the way through final implementation.

⁸ See Appendix C for an overview of how Idea Forms work.

PROJECT CLASSIFICATIONS: HOW IS THE WORK ORGANIZED?

Projects are organized into **project type** classifications, which determines the action needed to gain approval for programming changes, the development timeline and prioritization, and reporting and auditing guidelines:

Project Types	Description
Architectural Change	Projects that adjust the performance of a software product or its core infrastructure.
Card Conversion	This includes conversions for card portfolios, including new online clients or an existing client moving from one vendor to another for ATM/debit or credit cards. (See Note on Page 26.)
CU Conversion/ Merger	For new client conversions, mergers, and de-conversions managed by the Conversions Delivery Services team. Similar to Custom Requests as they are custom to one client, but billed based on a contractual agreement. NOTE: This should be used for the main conversion projects only; other related projects should be classified as Custom Requests.
Custom Forms	Requests for new or changes to custom forms (loan, membership, etc.) for individual clients. Generally submitted by Lender*VP. Billing is determined by our standard pricing procedures and pricing is quoted to the client by Lender*VP. Client approval for any billable amounts is required prior to the submission of the project for programming work.
Custom Internet Application	Requests for custom internet/integrations projects, such as interfaces with check image vendors, updates to loan app logos, indirect lending projects, etc. Generally don't require actual code changes but rather used to track configuration and verification tasks.
Custom Request	Projects done specifically for an individual or limited group of clients. Examples include custom fee programs, batch database maintenance ("floods"), custom reports or programs, branding, interfaces to 3rd-party vendors, custom branding for online and mobile products, Retailer Direct interface projects, and other development requests for a client (excluding custom forms) that fall outside the normal programming priorities but which are approved based on the client's agreement to fund all or part of the development costs. These projects can also include generic programming deployed as a part of the core software but only used by a limited group of clients. In most of these cases, work is billed to the credit union. Bid amounts are determined by our standard pricing policy. Client approval for any billable amounts is required prior to the submission of the project for programming work.
Feasibility Research	Projects that are submitted for research and programmer analysis only, to help us determine whether projects are economically viable and compatible with organizational goals.
General Research	For general programmer research requests that require more time than is allowed through a help desk ticket (maximum of 4 hours). This categorization helps manage research resources and prioritize work appropriately in conjunction with other business initiatives. Intended for research only; any changes to source code will be initiated via a separate project request. <i>Also see "Approvals for Research" on Page</i> 22.
Generic Forms	Projects that affect the standard loan forms available to all CU*BASE clients and which reside in CU*BASE rather than in custom libraries. Approvals and other handling procedures are similar to Program Modifications.
GOLD Screen	Projects that affect the GOLD user interface/presentation layer only and do not require related
Modification	host program changes. Project handling procedures are similar to Program Modifications.
MTG Mobile	Configuration and verification tasks related to deploying a new mobile app release. Does not include actual code changes.
Deployment Program Modification	These are requests for minor changes to the existing software, such as adjustments to screen
2 20grum 1,10uiiicuii0ii	layout or flow, requests for additional sort and selection options, adjustments to report output or layout, or other changes not directly covered by our warranty documentation. (See also "Warranty Adjustment.")

Software	These are requests for new functionality or significant enhancements to existing software. The	
Enhancement	scope can vary dramatically, and project specifications are generally required. Also see	
	"Capitalized Improvements (FASB)" below.	
Warranty Adjustment	Issues reported by clients or staff regarding the normal operation of CU*BASE or other	
	software that cannot be quickly resolved using normal research and troubleshooting	
	techniques or education. Projects are typically accompanied by excerpts from online help or	
	other published documentation that demonstrate the software is not working as warranted.	
	(See also "Program Modification.")	

Capitalized Improvements (FASB)

Before they are assigned for development, all projects categorized as Software Enhancements are evaluated based on Financial Accounting Standards Board (FASB) requirements for the capitalization of development costs. Evaluations are done by the EVP of Software Development and VP of Quality Control, with input as needed from corporate officers and other key leaders to determine the appropriate classification, based on the scope and type of work being done.

PROJECT APPROVALS: WHAT MAKES IT TO THE ASSEMBLY LINE?



Guidelines for Business Evaluation

As already discussed, the Quarterly Strategic Planning sessions (see Page 4) allow for our executive leadership to play a role in overseeing and making business decisions on what the software factory works on. In addition, for custom projects submitted through the DHD, as well as for software enhancements that involve a 3rd party vendor, starting in July 2024 incoming projects will be routed via Track*IT to the VP of Management Services.

The role of the VP of Management Services is to review project requests that involve new vendors, or that are making significant changes to existing vendor relationships, to determine:

- Is this a product or service that competes or conflicts with any existing functionality?
- Is this product in line with our overall business direction?
- Does executive management wish to move forward with the project based on business considerations?
- Does CU*Answers wish to participate in the project financially?

If the decision is made to move forward, the VP of Management Services assigns a CU*Answers Management Services (CMS) team to participate as subject-matter experts in the design process. For projects that will be commoditized and utilized by the larger network, this allows the CMS team to begin preparing for downstream tasks such as marketing, implementing, documenting and providing ongoing support, as well as working with executive management to set pricing.

Guidelines for Making Approvals

The previous sections of this policy explain the timing rules that govern how projects are moved through the system (doing the paperwork). While these rules are important to ensuring we respond to clients in a timely fashion, there are also rules of thumb for deciding whether a project should proceed at all. These benchmarks make it possible to say no to ideas that might be well worth doing, but that don't necessarily fit *today's* priorities and client agendas. Some basic rules of thumb our approvers use when making the go-or-no-go decision:

■ For Program Modifications and Warranty Adjustments: With the exception of fast-tracked projects already described, to get a yes it must be realistic that the **work can begin within the next 12 months** after the project is approved.

- For Software Enhancements and Architectural Changes: Initial approval is based on our estimate that it is feasible for preliminary research and/or design work to be completed within 18 months of project approval.
- For Custom and Conversion projects: Initial approval is based on separate client approval and contractual agreement processes.

Other factors in the decision-making process include regulatory deadlines, pressure from marketplace environmental changes, contractual obligations, and long-term strategic demands from technological advances and security-related concerns.

Of course despite our best intentions, priorities do shift and projects get delayed. Therefore, we require that when a designer or programmer is ready to begin working on a project that has moved outside of those time frames, a quick review session should be scheduled with key leaders and subject-matter experts to determine if the idea is still timely, or if another round of due diligence may be warranted. (In other words, the trigger for the evaluation is that someone is available to begin the work, as opposed to a periodic review just based on the project's approval date.)

Escalating a Project to be Fast-Tracked Through the SDLC

If a project is determined to have an effect on data integrity or a direct effect on members, the project will immediately be escalated and delivered to a Programming Assistant Manager for immediate assignment.

- Data integrity projects are those that address a critical need for clients with an impact on income or where critical data is being corrupted.
- Projects with a direct member effect include performance of member-facing tools like online or mobile banking, audio response, and the like, or communication channels such as statements, alerts, and notices.

These projects are addressed immediately and deployed on demand as soon as testing has been completed. This could include a program change, a user-interface/screen change, or both, and updates would be made to impacted clients as soon as possible. In some cases the programming work may need to begin immediately, even before formal project creation and approvals can be processed.

This may also at times include making repairs on affected data and notification would be given to clients through the Alert process as to progress, action taken, and documentation of impact. This type of project is driven by the need to get out to clients as soon as possible and both the programming and QC teams will move these projects ahead of other priorities. We may also enlist the help of other staff to quickly review repaired functionality or to coordinate with clients.

With the exception of design specifications and beta-testing, however, the project will still be run through all of the usual approvals and other SDLC steps, just at a significantly faster pace or concurrent with initiation of development.

Why would a Warranty Adjustment ever be disapproved? You might wonder what circumstances, if any, would result in a project of this type ever being denied. After all, if software behavior doesn't match up with how it's documented, wouldn't we automatically change it? While it is rare, there are a number of reasons why an individual Warranty Adjustment project request might end up being disapproved.

The most common reason is that the project was inadequately researched and/or documented prior to being submitted, so that there was not enough information to determine whether a repair was actually needed, or enough direction for the programmer to begin analysis. (Most of these are usually re-submitted later, after additional research is documented.) Another common reason is that the project is a duplicate of another project submitted. This can happen if multiple clients report something and more than one CSR ends up writing it up at the same time, unbeknownst to the others.

There are also times when the change would actually entail a higher risk to clients or the software's integrity, and therefore a decision is made to instead alter the warranty to explain how the software actually was intended to work. And there are cases where the documentation is ambiguous or incorrect through an inadvertent error on the part of the writer, and simply needs to be corrected.

Approvals for Research

An approval for research means that a specified amount of research and initial design work must first be completed, and that the work will not be assigned for development until the results of that research have been evaluated by appropriate Product Team leaders.

The most common example of this type of project is one where we need to look for an external partner for joint development. For example, credit unions might want us to begin providing a tool for members to make loan payments using a credit card they have at another financial institution. This would require an interface to an external partner for credit card fulfillment (Intuit is one example of such a vendor). An Approval for Research in this case would include the requirement of a preliminary design spec and selection of the partner(s) to which the interface would be built. From that research any ancillary project costs would be ascertained and all of these would be used to make the final go-or-no-go decision.

Another example would be research for technical feasibility and/or security concerns. Sometimes we are asked to add a process or service but after initial research, it is decided that based on security considerations or basic compatibility with existing infrastructure, the project scope must be changed significantly, or, in rare cases, abandoned altogether. An Approval for Research in this case would involve technical analysis and brainstorming to determine feasibility and an appropriate approach to be used in the formal design stage.

Another aspect of the Research process is often estimating the cost of the development effort. This can include codevelopment costs from third-party partner arrangements, the purchase of special software or hardware tools, an estimate of the number of anticipated development hours, potential hiring of external contract developers, and the like. The project might also need to budget for the time and expense of an additional third-party external security review with penetration test. As with the preliminary design work, the results of this research would be used to make the final go-orno-go decision.

NOTE: Custom projects, where the client is agreeing to fund all or part of the development costs, may be subject to a Research & Design Fee, intended to cover the cost of doing in-depth feasibility research and sketching out a design outline for how the project could proceed. This fee is subtracted from the complete project cost once final authorization from the client to proceed with development is obtained. For more details, refer to the Initiating a Special Project Request page of our website.

Once research has been completed, depending on the scale of the project the research project is usually marked as closed and a new project initiated specifically for the development work. The normal approval workflow would apply to this new project.

Intellectual Property Rights Guidelines

Software development carries the inherent risk of infringement on the intellectual property rights of others. CU*Answers will not knowingly develop software or use third-party software that infringes on the intellectual property rights of others. These guidelines are intended to reduce the risk of intellectual property infringement during the course of developing software. Anyone involved with software development:

- Will not approve a project that knowingly infringes on the intellectual property rights of others.
- Will not incorporate software, including Open Source software, into a project unless CU*Answers has a license to use this software or proof that a license is not needed.

Upon suspicion⁹ that upon completion a project would infringe on the intellectual property of others, work on that project will be stopped and the Executive Council team will be alerted. The Executive Council will determine whether a patent search is required or whether the risk is acceptable or non-existent.

Guidelines for Data Exchanges

CU*Answers cares deeply of the privacy and security of our credit union clients and their members, and endeavors to avoid negligence that could result in monetary or reputation loss to our CUSO. CU*Answers will not approve projects or will stop development on projects where:



- CU*Answers would be grossly negligent in the protection of non-public personally identifiably financial information, such as transfer in open text over a public network (see also "Basic Standards of Secure Software Development" starting on Page 26);
- CU*Answers knows or should know that transmitting the data is a violation of federal or state law;
- CU*Answers knowingly or recklessly contravenes its authority to act on behalf of a credit union, such as providing personally identifiable information to a party CU*Answers knows would not be authorized to see this information.

The Executive Council will ultimately determine whether a project would violate any of these guidelines.

⁹ Suspicion means that an employee has some evidence that the resulting project could infringe on the property rights of others.

PROJECT SPECIFICATIONS: HOW DO WE GET OUR CLIENTS' VISION INTO OUR PRODUCTS?

To Spec or Not to Spec

Although not all project types are routed through this stage, a project specification is generally required for all projects involving CU*BASE that are classified as Software Enhancements, and occasionally for CU*BASE projects designated as Program Modifications. Some other project types and product lines may also need a basic project spec if more detailed instructions are needed to proceed with the work.

Design specifications allow us to be more specific about the expectations that clients and the marketplace have for how the product will look and what the end-user experience will be. Although some technical details are included, these specs are primarily an end-user requirements document that spells out in plain language how the finished product should behave when used by clients.

Whether or not a spec is written depends on the scope and complexity of the project, the areas of the software that are involved, and how much detail was provided by the originator of the project. For example, an enhancement involving the CU*BASE Teller software will usually require a spec, while one that tweaks a navigation feature on a screen might not need anything further than what the originator explained when submitting the project.

This is one of the reasons why the EVP of Client Experience, who oversees the Writing Team, is included as one of the default approvers on Software Enhancements, so that a decision can be made as to whether specs are appropriate or not.

Spec Review Sessions

An important component of the Design stage is the spec brainstorming/review session. Useful for creating a better design, these brainstorming sessions allow for executive management, specific subject-matter experts, and even credit union representatives to be involved in the design process, without having to physically handle the detailed spec-writing chores.

These sessions can occur prior to design specs being started, as well as at a few points during the spec-writing process, to allow designers to consult with technical and market-facing resources on certain aspects of the project design. Attendees vary depending on the project but usually include the EVP of Client Experience and/or the designated spec writer along with the CEO, the EVP of Software Development, the assigned programmer and/or Programming Team Leader, along with all other subject-matter experts and resources who can provide input and assistance with design decisions.

A Word About the Timing for Writing Project Specs

Although the Design phase is shown as stage 3 for the SDLC, in the case of major Software Enhancements it is actually far more likely that a spec will be written in advance of the project officially being submitted for approval. This is due in part to the amount of time required to develop design specs. By waiting to start the project in the system until after the initial design work is complete, we can avoid a project languishing for too long at a pending status, causing confusion and unrealistic expectations when clients review the database for projects in progress.

Although it is rare, it is also possible that a spec could be written but the project ultimately not be approved for further work. Examples would be when a client that was championing a project (whether financially or otherwise) decides not to proceed, or the industry environment changes so that the demand for the enhancement falls off.

IMPLEMENTATION PLANNING: HOW ARE DEPLOYMENT DECISIONS MADE?

Standard Release Schedule

For CU*BASE, there are generally two releases per year, one in the spring and the other in the fall, plus a minor year-end tax release every December. Additional minor releases are also scheduled as needed between the major releases. Because of the way they intertwine with CU*BASE and the core membership database, changes to other software products may also be included in these releases, most commonly It's Me 247 online and mobile web banking or Imaging Solutions. Releases for other product lines are scheduled as needed. Release dates are tracked on the official Release Schedule.

Deployment Options

Many factors go into making the decision for the method by which a particular project will be implemented. The Product Team and its key leaders and subject-matter experts are responsible for choosing and documenting the appropriate deployment method selected for each project:

Deployment Method	Typical Uses
Major Release	Includes advance notice to clients, traditional beta, training and documentation. This is the method used for larger enhancements, especially where client notification and training is necessary.
Release Without Beta	Similar to major release, but with tighter timelines, lighter documentation and lower-risk projects. The year-end release usually falls into this category as we have regulatory changes for year-end processing and other minor enhancements.
GOLD Update	Minor CU*BASE release done between scheduled major releases, with client notification but no training or advance notice needed.
On-Demand – Priority Mods	Deployed to all as soon as possible, with full disclosure of impact and action taken.
On-Demand – Minor Mods	Deployed as soon as practical with a monthly summary to document the changes. Communication is made directly with client requesting change, if applicable.
Active (Live) Beta	Applies to CU*BASE enhancements with minimal or no impact on client activities or data, such as analysis dashboards. Active beta-testing streamlines the testing process by getting the tools directly into clients' hands for real-life field testing. These projects undergo only minimum QC testing and are deployed for all clients via the "Active Beta Tests" menu. Clients can participate in training sessions where software is explained and participants can give feedback for future changes/development.
Custom Releases	These projects are done on demand, in coordination with the client. These are normally billable projects with a timeline determined between the client and CU*Answers.
Special Beta	This type of deployment is used for CU*BASE (often including a special GOLD version) and sometimes for other tools such as online/mobile banking, imaging tools, etc., to allow one or more specific clients to use new software, separate from a major release. The QC on these projects can be varied from minimal to full testing, but the beta will run in a special timeline other than a normal release beta environment. When Product Team leaders are satisfied that it is ready to deploy to all clients, the project will then be merged into a release.
Passive Beta	This involves releasing the updated software but not activating the new functionality, to allow for regression testing to reveal any unintended consequences to existing software.

Making the Decision

Below are some of the considerations that drive the decision process for deployment:

- What is the priority of the project? Is this a project that repairs a critical issue for clients? Is it data integrity?
- What is the risk of delaying the implementation? Is there an impact on a high volume of members, high volumes of transactions, member facing, or possible impact on income?
- Which clients are needing or demand the change? This could be a new client agreement or special needs for existing clients. These are often driven by promises to clients or part of a custom bid agreement.
- What is the impact on end-users? How much change will the user see and how many users will be impacted in their work. How much notice needs to be given?
- **Are there GOLD changes?** Refers to screen changes on a CU*BASE-related project. These projects need to consider GOLD development and versioning.
- Will the change require documentation or online help changes? If needed, is an Alert sufficient for the notification?
- Are there file changes or other core structural changes? Generally refers to CU*BASE-related projects, but could also apply to other products that have versioning requirements that affect deployment. File changes can impact other areas such as shared branching and need to be considered in how deployment is best attained.
- Will clients need training? Depending on scope, release training may be necessary or there could be targeted training for segments of users.
- **Are there any regulatory deadlines?** This is always a consideration for compliance to credit union or CUSO regulation requirements.
- Are there any restrictions on running as a beta? For instance, EFT changes often have to be deployed to all clients at one time.
- **Is it a passive or an active change?** Is this a change that has to be initiated by clients to activate? Can it be deployed with no immediate impact?
- What kind of QC effort is necessary for this project? Depending on the other considerations, there are different levels of QC for various types of projects.
- **Will this have an impact on Operations**? Is there other internal staff that will need to make adjustments for the changes?



A Note About Card Conversion Projects

For card conversion projects that involve new EFT vendors, these projects are open until live day when cards are active for all members. Changes can be implemented via that project through completion of friends and family testing. After live day for members, additional projects must be created for any adjustments. In these situations we will add the following note into Track*IT:

"This project will require an exception to move CU*BASE programs into production prior to the live date due to Friends & Family testing. The project must remain open until live week."

BASIC STANDARDS OF SECURE SOFTWARE DEVELOPMENT

Introduction

CU*Answers is both contractually and, as a Credit Union Service Organization, ethically bound to protect the non-public financial information of credit union members. As a software developer, CU*Answers agrees to provide reasonable security to member information. Following good security practices protects the company and its employees from actual losses and reputation losses as a result of the misuse or theft of member information. After all, most CU*Answers employees are members of credit unions within our network and are therefore in the business of protecting their own personal financial information from harm.

CU*Answers cannot guarantee that breaches of member information can always be prevented, either through machine or human error. CU*Answers can only agree to take reasonable measures to protect this information and to act responsibly in the event that a breach does occur.

CU*Answers will use reasonable methods to protect the personally identifiable financial information and nonpublic personal information of credit union members. CU*Answers is not permitted to fall below this standard even if an offer of indemnification is made by the credit union. (Members may be able to sue CU*Answers for violations of law irrespective of any separate indemnification made by the credit union). Reasonable methods to protect information are defined as methods that do not wantonly or recklessly endanger member information by insecure storage or transmission.

Secure Software Development Standards

There are basic standards of programming and encoding that CU*Answers will adhere to in order to protect member information. These basic standards are intended as guidelines for programmers to comply with the requirements of securing member information. CU*Answers may always exceed these guidelines, but should never fall below them unless approved by Executive Management.

Authentication and Password Management	CU*Answers will require authentication for all pages and resources, except those specifically intended to be public.
Cryptographic Practices	CU*Answers will not rely on weak cryptography controls or methods, and will update insecure methods of encryption whenever practical.
Input Validation Principles	All data validation shall be conducted on a trusted system. All validation failures should result in input rejection.
Error Handling and Logging	CU*Answers will avoid disclosing sensitive information in error responses, including system details, session identifiers or account information.
Data Protection	Whenever possible, programming teams will implement "least privilege," meaning that users will be restricted to only the functionality, data and system information that is required to perform their tasks. CU*Answers will avoid storing passwords, connection strings or other sensitive information in clear text or in any non-cryptographically secure manner on the client side. Applications should support the removal of sensitive data (e.g. personal information or certain financial data) when that data is no longer required.
Communication Security	CU*Answers will implement reasonable encryption methods for the transmission of all sensitive information.
Change Control	CU*Answers will implement a software change control system to manage and record changes to the code both in development and production.
Database Security	Programmers will use secure credentials for database access, and will secure member information on the database (through encryption or other reasonable means) when practical.
File Management	Programmers will require authentication before allowing a file to be uploaded, and limit the type of files that can be uploaded to only those types that are needed for

	business purposes. Validation that uploaded files are the expected type will be done by checking file headers.
Updates	CU*Answers will implement secure updating as is practical. If the application will utilize automatic updates, then we will use cryptographic signatures for the code and ensure download clients verify those signatures. We will use encrypted channels to transfer the code from the host server.
Education	CU*Answers programmers will take reasonable steps to remain educated on updates with respect to security best practices and will implement such practices when practical or as required by law.

Secure Development Standards and the CU*Answers Development Environment

Effective October 1, 2016, when a project is assigned to a team for development, the EVP of Software Development will be responsible for flagging the project as to its exposure from a security standpoint:

- *Internal only* for example, a CU*BASE software feature that has no exposure to the Internet nor direct third-party interactions.
- External exposure for example, online or web banking tools, APIs, third-party integrations, etc., where additional security evaluations or components may need to be built into the design, testing, and/or implementation process. Includes any project that will have an impact on a key PCI (Payment Card Industry) standard area.

For projects flagged with an external exposure, the secure development standards outlined in this section will be evaluated along with our usual testing standards during the QC testing phase of the project life cycle.

NEW

Internal Auditing

In keeping with our security focus, software enhancements and custom projects will be be reviewed and approved by the CU*Answers Internal Auditor¹⁰, whose role is to:



- Determine if this project requires vendor due diligence to be completed.
- Determine if a Security Code Review is needed before this project can move to the next phase.
- Determine if a Security Project Review is needed before this project can move the next phase.
- Complete a Security Checklist and attach it to the project in Track*IT.

NEW Security Code Review

For all projects identified by the internal audit as requiring a Security Code Review, this process will be initiated after QC testing is complete. This secondary code review will be performed by a separate reviewer (than regular code review) with specific attention paid to the security of all aspects of the project. A completed code review checklist will then be attached to the project in Track*IT.

NEW Security Project Review

For all projects identified by the Internal Auditor as requiring a Security Project Review, one will be set up upon completion of the Security Code Review. While other project reviews may happen throughout the traditional development process, a final, Security Project Review will be complete before final signoff on a project can be completed. This project review will invite the same audience as we do in a traditional project review, with the exception of requiring Internal Auditor to attend, and sign off on the project. The Internal Auditor signoff will be attached to the project in Track*IT.

¹⁰ Refer to Page 29 for more details on this secure software development process.

Biometric Security Checklist

Deploying Projects that Capture Biometric Data

Before any project that captures or stores biometric data can be moved into production, CU*Answers will ensure the following items are reviewed and confirmed:

Privacy Policy	The client has a publicly available Privacy Policy that states what the biometric data is used for, its retention, destruction, and the rights of the consumer.
Consent	The client obtains consent from the consumer to acquire the biometric data.
Secure Acquisition	The site or application that acquires the biometric data does so with security standards consistent with this SDLC.
Secure Transmission	The biometric data is transmitted using security standards consistent with this SDLC.
Secure Storage	The biometric data is stored according to security standards consistent with this SDLC.
Destruction	Biometric data is destroyed as soon as it has fulfilled its purpose, or shortly thereafter if maintained for troubleshooting or other reasonable purposes, consistent with other security standards in this SDLC.
Third Parties	Biometric data is not provided to third parties unless these parties are needed for the service and have agreed to indemnify CU*Answers.

Technical tools we use for managing the development project queue.

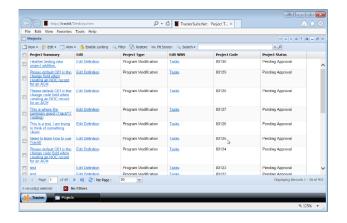
DAY-TO-DAY ADMINISTRATION

The primary mechanism for tracking projects as they flow through the SDLC is the **Track*IT** online project tracking tool.

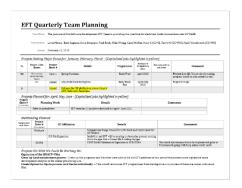
As projects move through the various stages they are marked in Track*IT with a status code. This status is also reported to clients via the *Owner's View* website.

The **Release Schedule** compiles major projects being slated for specific releases. To keep the document size manageable, only major projects are listed on this summary. A PDF copy of this schedule is posted weekly on the Release Planning page of our website for clients to view: cuanswers.com/resources/doc/release-planning/

For the **Quarterly Strategic Planning** sessions, each programming team leader is responsible for summarizing their team's current activities, projects slated for the next calendar quarter, and outstanding projects that are waiting in the wings.

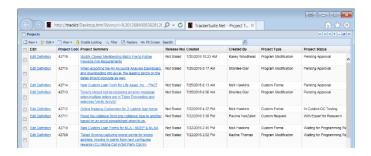


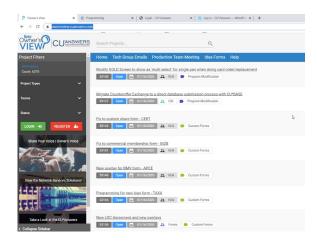




Track*IT monitoring reports and tools are utilized to keep on eye on project progress and investment, especially when it comes to allocation of programming resources. For example, the EVP of Software Development receives regular email notifications from the online tool showing projects that are exceeding certain levels of development time, and reports are monitored regularly for capitalized projects that have not been assigned. See also the "Guidelines for Making Approvals" section on Page 17.

Developed by participants in the "Building Solutions in a Cooperative" Boot Camps, **Owner's View** is an online resource (<u>ownersview.cuanswers.com/</u>) that allows clients to review the current status of all projects currently in the pipeline.





Tools that explain software changes to our clients and help them keep up with work as it moves through the factory.

Updates on Projects In the Design Stage

The Kitchen page on our website contains project outlines and news about major projects that are currently in the design stage or early stages of development. Some projects may be only a commitment to do the research, while others may be commitments to invest in actual development.



Release Planning Materials

The <u>Release Planning</u> page on our website outlines upcoming CU*BASE release dates and provides links to the SDLC, current Release Schedule, and other release planning materials.

Also, a GOLD Updates recap showing next upcoming CU*BASE release date appears as a sidebar on most of our website pages.



Release Documentation

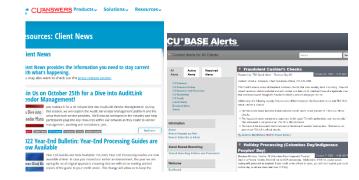
The <u>Release Summaries</u> page on our website includes release communications about major releases, as well as the Owner's View Monthly Recap summarizing minor projects implemented between releases.



Direct Client Communications

The <u>Client News</u> page on our website is used to post the contents of all broadcast email communications sent to clients.

Another communication tool is the **CU*BASE Alerts** page, available to clients only and accessed via a link in CU*BASE.





APPENDIX A: RELATED POLICY AND PROCEDURE DOCUMENTS

A handy list of other policies, websites, and procedure documents that supplement and support the SDLC and specific areas of the development factory.

Document	Where
Adding a New Assembly Line to the SDLC	On the Quality Control Nucleus page
Client News page on our website	http://www.cuanswers.com/resources/news/
CU*BASE Software Testing and Quality Control Procedures	On the Quality Control Nucleus page
Developer Guidelines	On the Programming Nucleus page
<u>Initiating a Special Project Request</u> page of our website	http://www.cuanswers.com/resources/project- management/initiating-a-special-project-request/
<u>Jump in the Beta Pool</u> page on our website	http://www.cuanswers.com/resources/beta/
Quality Control Design	On the Quality Control Nucleus page
Release Planning page on our website	http://www.cuanswers.com/resources/doc/release-planning/
Release Schedule	X:\Quality Control\Public\Quality Control\Intranet\CurrentReleaseSchedule.docx
User Interface Style Guide	On the Programming Nucleus page
Writing Project Specs	On the Writing Team Nucleus page
Writing Team Demystified	On the Writing Team Nucleus page
Writing Team Guidelines	On the Writing Team Nucleus page

APPENDIX B: TRACK*IT AUTHORIZED USERS

A list of job descriptions for which Track*IT access will be allowed, and basic parameters for what those employees will be allowed to do in the online tool.

Access Type	Job Title
Can adjust configuration and administrative settings in the Track*IT tool and control other user access. Can create, approve, and assign projects, modify statuses, log activity, adjust project settings, and all other tasks necessary to manage projects in the pipeline.	VP Quality Control VP Software Development DHD Account Executive
Can approve and deny projects, including attaching notes and special instructions.*	CEO EVP Software Development EVP Client Experience VP Quality Control Programming Assistant Managers VP Professional Services Other key subject-matter experts as needed
Can assign projects.	EVP Software Development VP Quality Control Programming Assistant Managers
Can create projects** and attach project documentation.	Programming Assistant Managers QC Testers VP Client Services & Education Assistant Manager of Client Services & Education Account Executives/CSRs EVP Client Experience Technical Writers
Can log project activity.	Programmers QC Testers

^{*}Anyone in the default approval flow can add a subject-matter expert to the approval list for a specific project. That person does not require any special permissions other than basic access to the Track*IT software in order to log approval.

This is a general outline only and is subject to change. Exceptions may be granted as needed according to job responsibilities and project workflow requirements. A current list of employees with access to the Track*IT online tool can be obtained via the Quality Control Nucleus page or via the VP of Quality Control.

^{**}The ability to create a project also includes the ability to adjust the project settings (not including approval or project status), but only for those same projects.

APPENDIX C: THE IDEA FORM

A brief overview of the Idea Form process and how it is used by clients to provide input and make suggestions for changes and new software tools.

The Idea Form: An Online Suggestion Box

The Idea Form is an online suggestion box for our clients to submit ideas and recommendations for enhancements to our software tools, whether CU*BASE, It's Me 247, or other product line.

An Idea Form is intended to start dialogue with our design and development teams. Unlike an official project under the SDLC, this channel is not intended for reports of warranty issues or specific requests for custom work a credit union wants done. It's a place for blue-sky dreaming about what we *could* do.

Idea Forms can be directed to one of several product leaders, including the CU*Answers CEO, based on general subject matter. Our cuasterisk.com partners also receive copies of their own clients' submissions.

Idea Forms must be accessed via a link in the CU*BASE software, which limits them to current clients, but any employee can use this channel to submit their ideas. No formal buying powers are implied by the submission of an Idea Form. Idea Forms are not tracked in any way, and there is no mechanism for following up on ideas that do not result in a formal project.

Although many ideas submitted via an Idea Form do eventually make their way into the SDLC as a project, the Idea Form itself is not a direct access point for initiating one. Even if the consensus from the team's initial dialogue is to proceed with development, that project still must go through the entire SDLC flow, including the formal approval process.

