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A Credit Union Service Organization
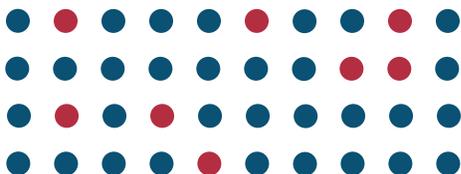
MOP
Membership Opening Process

VERSION
June 2021

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Quick Reference Summary of Controls

MOP WEBSITE CONTROLS

Cross Site Forgery Prevention
Inputs are sanitized, and session tokens are used to prevent cross site forgery.

Session Timeout
The timeout is 5 minutes and activity based, meaning if the user has an idle screen for 3 minutes the user will get a popup advising 2 minutes are left. If the user maintains activity, the session will continually extend itself. Activity is mouse/keyboard actions on the active browser window.

MOP Restrictions based on Session
Users cannot jump ahead or go back on certain pages, and verify, fund, and enroll processes are restricted to single use (even when multiple windows are opened to the same page).

Dynamic API keys for External Access
Keys needed for external access to MOP change all the time, rather than a static set of keys that could be lost or stolen.

DATA TRANSMISSION

Encryption
Information entered by the applicant is encrypted through HTTPS during transit. TLS 1.2 is enabled and preferred. This is standard. Encryption will only fall back to TLS 1.1 and TLS 1.0 if the member's browser does not support 1.2.

Data Storage
No member data is stored on the MOP servers. Any stored data is sent securely to CU*BASE.

VERIFICATION CONTROLS

Patriot Act Disclosures
Required Patriot Act disclosures are provided on the MOP site to the end user.

Precise ID Verification
Verification itself is provided by Experian Precise ID (a mandatory subscription required to use the MOP service).

OFAC/Blocked Persons
MOP includes an Experian Precise ID scan which asks the applicant questions to confirm their identity. This process also includes an OFAC scan. A record of the scan is saved in the Experian ID software. The membership OFAC Tracker will record the next time an OFAC scan is run on all memberships.

Credit unions may be asked by examiners or auditors to provide a MOP risk assessment, documenting MOP's safeguarding of non-public personally identifiable information, and the requirements for member verification under the Patriot Act. This document provides a description of the controls used to protect sensitive information and verify identity.

CU*Answers' online Membership Opening Process ("MOP") allows our network credit unions to conveniently enroll and verify new members from a user-friendly and attractive webpage. All required disclosures and identity verification steps are provided through this seamless MOP process. MOP is a secure method for enrolling new members online. As with any online member verification system, controls implementing verification through Precise ID will affect the number of false positives or fraudulent confirmations.

Overview of MOP Security Features

MOP WEBSITE CONTROLS

The page and its forms are protected through input sanitization and the use of session tokens. The user session will time out after five minutes of activity, with a warning popup to let the user know the session will be terminating. Users cannot jump ahead or go back to certain pages, and the enroll processes are restricted to single use (even if the user has multiple pages open). Information is encrypted through industry standards, and the MOP site does not store any user information. Information is passed directly to Experian Precise ID and stored securely within CU*BASE.

MOP VERIFICATION

Required Patriot Act disclosures are provided on the MOP site to the end user. Verification itself is provided by [Experian Precise ID](#) (a mandatory subscription required to use the MOP service). Credit unions can tweak these Experian rules to exclude questions or include different questions that can be asked. CU*Answers will help the credit union work with Experian if the institution requires assistance during this process. Credit unions can also optionally allow users to end the MOP session and request a "traditional" Member Application Process ("MAP").

If a prospective member does not pass the criteria for Experian Precise ID verification, CU*BASE Tool #13 '[Work Online Banking Apps/Requests](#)' allows the credit union to further review the application. If the member passes the first step of Experian Precise ID verification, the application is also run through the Blocked Persons database within CU*BASE. If there is a Blocked Persons match, this match

will also be submitted to CU*BASE under Tool #13 'Work Online Banking Apps/Requests'.

OFAC/BLOCKED PERSONS

MOP includes an Experian Precise ID scan which asks the applicant questions to confirm their identity. This process also includes an OFAC scan. A record of the scan is saved in the Experian ID software. The membership OFAC Tracker will record the next time an OFAC scan is run on all your memberships.

An online membership application can also end as a membership application to be worked in Tool #13. During the process of working the application and converting it to a membership, an OFAC scan is run. There is no OFAC record of this scan in the membership OFAC tracker because the member was still a non-member at the time the OFAC scan was run. Proof of this scan can be found using Tool #559: OFAC Non-Member Scan History. Look for the date range the membership was opened and OPEN NEW MEMBERSHIP will appear as the reason for the OFAC scan of the member. The Membership OFAC Tracker will record the next time an OFAC scan is run on all your memberships.

ACCOUNT OPENING AND ONLINE BANKING

Once Experian Precise ID verification and Blocked Persons checks are passed, members may now open accounts and fund the base share account through the Card Services product with Magic Wrighter. Once a member completes their deposit, Magic Wrighter converts this transaction to ACH and the credit union will receive the deposit through their daily ACH processing. Once the new member works through all the steps registering through MOP, the member may go directly to Online Banking within **It's Me 247** (desktop & mobile).

CU*BASE Tools allow the credit union to configure forms to send to new members for compliance requirements such as Truth in Savings and eSign.

Product Feature Matrix

To help you assess MOP security controls, CU*Answers has developed a Product Feature Matrix that lists the security features of MOP.

ENCRYPTION

Information entered by the applicant is encrypted through HTTPS during transit. TLS 1.2 is enabled and preferred. Encryption falls back to TLS 1.1 and TLS 1.0 only if the user's browser does not support 1.2.

No member data is stored on the MOP servers.

CROSS SITE FORGERY PREVENTION

Inputs are sanitized, and session tokens are used to prevent cross site forgery.

SESSION TIMEOUT

The timeout is 5 minutes and activity based, meaning if user has an idle screen for 3 minutes the user will get a popup advising 2 minutes are left. If the user maintains activity, the session will continually extend itself. Activity is mouse/keyboard actions on the active browser window.

MOP RESTRICTIONS BASED ON SESSION

Users cannot jump ahead or go back on certain pages, and verify, fund and enroll processes are restricted to single use (even when multiple windows opened to same page)

DYNAMIC API KEYS FOR EXTERNAL ACCESS

Keys needed for external access to MOP change all the time, rather than a static set of keys that could be lost or stolen

Version Control

VERSION	DATE	CHANGE	TEAM
1.0	June 14, 2018	First published	Internal Audit
2.0	May 23, 2021	Revised for clarity	Internal Audit

Learn More

Learn more about the MOP process.

CONCERNS ABOUT PATRIOT ACT OR BSA?

AuditLink can provide support for CU*BASE security and tool options.