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CU*ANSWERS

Risk
Assessment
for MOP
Membership Opening Process

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INTRODUCTION

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.

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 information and verify identity.

FEATURES

Experian Precise ID to verify new members' identity

Create new accounts, fund accounts from a credit or debit card, and enroll the new member in Online Banking online

Providing the new member with an opportunity to use "It's Me 247" Online Banking immediately



*Learn more online at the
Internet Retailer Support Center.*

CONCERNS ABOUT PATRIOT ACT OR BSA?



[AuditLink can provide support you need for BSA and the Patriot Act.](#)

QUICK REFERENCE

MOP WEBSITE CONTROLS



Cross site forgery prevention: Inputs are sanitized, and sessions tokens are used to prevent cross site forgery.

Session timeout: The timeout is 5 minutes and activity based - meaning that if the user doesn't do anything for 3 minutes they will get a popup giving them 2 minutes to act to stay in the session. If they are active on a screen the session will continually extend itself. Activity is mouse/keyboard based 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. It falls back to TLS 1.1 and TLS 1.0 only 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 your memberships.

Overview of MOP Security Features

MOP is a secure method for enrolling new members online. 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 terminate. 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.

Overview of MOP Verification Features

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 with a click may go directly to Online Banking within **It's Me 247** (desktop & mobile).

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

FEATURE MATRIX

To help you assess MOP security controls, we have developed a Product Feature Matrix that lists the security features of MOP.

Encryption	Cross site forgery prevention	Session timeout
<i>Information entered by the applicant is encrypted through HTTPS during transit. TLS 1.2 is enabled and preferred. This is standard. It falls back to TLS 1.1 and TLS 1.0 only if the member's browser does not support 1.2. No member data is stored on the MOP servers</i>	<i>Inputs are sanitized, and sessions tokens are used to prevent cross site forgery</i>	<i>The timeout is 5 minutes and activity based - meaning that if the user doesn't do anything for 3 minutes that will get a popup giving them 2 minutes to act to stay in session. If they are active on a screen the session will continually extend itself. Activity is mouse/keyboard based on the active browser window</i>
MOP restrictions based on session	Dynamic API keys for external access	
<i>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)</i>	<i>Keys needed for external access to MOP change all the time, rather than a static set of keys that could be lost or stolen</i>	

VERSION CONTROL

VERSION	DATE	CHANGE	TEAM
1.0	June 14, 2018	First Published	Internal Audit