

Risk Management and Compliance: Addressing Uncertainty with Integrity

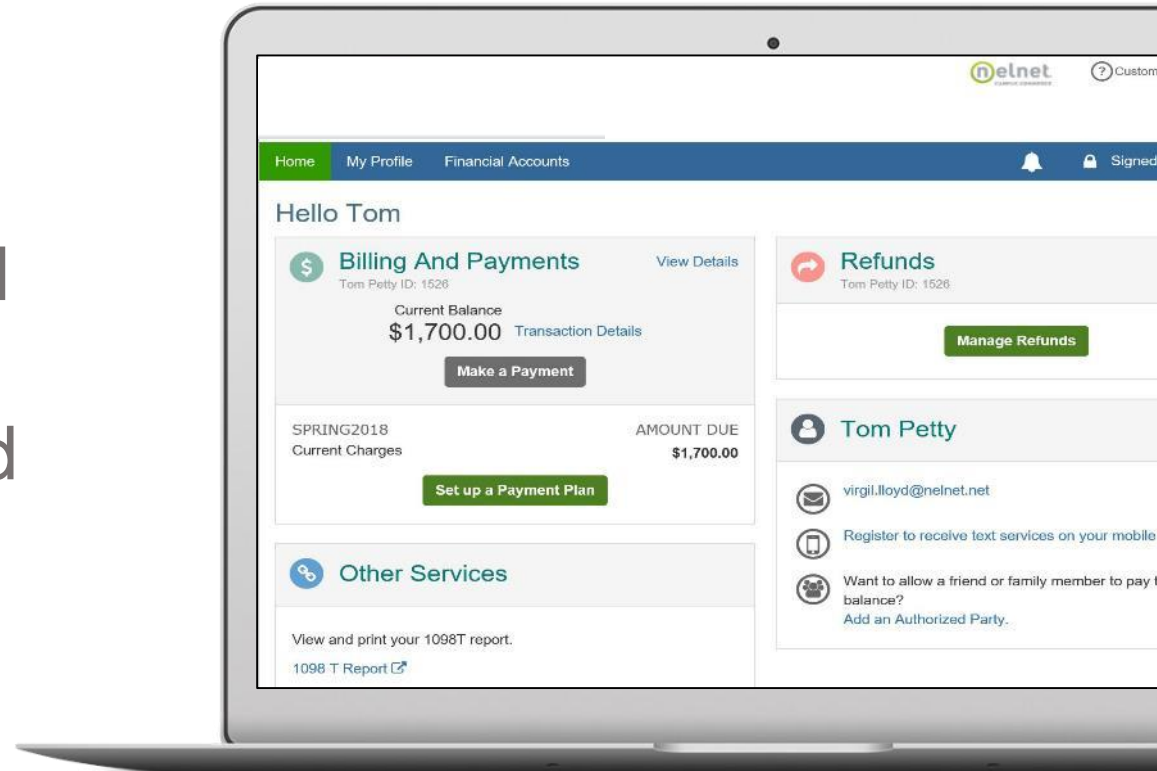
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MCCBOA Summer Workshop 2018





Nelnet Campus Commerce

- Experienced
- Integrated
- Service Oriented
- Comprehensive
- Student Focused





Audience response

Web

Pollev.com/vlloyd722

Mobile

- 1) Text [VLLOYD722](#) to [22333](#) to join the session, then they text Choose custom keywords
- 2) Text a response

When you think of Risk Management and Compliance what words come to mind?

What is Risk Management?

The management of risk involves the identification, and assessment, and a coordinated response to, and control of, unfortunate events.

of assessment, followed by a plan for and control



Risk Management in Higher Ed



Why it Matters

- Protecting the data of 20.4 million students (NCES, 2017)
- Multiple points of entry
- Increased scrutiny by the banks
- Staying out of the news

Who's data is HE protecting?



- Students
- Families
- Authorized Payers
- Authorized Parties
- CC employees

Which company or institution has been compromised with a data breach?

Target

Yale University

Anthem

University of
California, Berkely

All of the above



Best Practices

To avoid a data breach

- NEVER email CC info or process payments received by email
- NEVER store CC numbers in any database or spreadsheet
- Mask all but first 6 or last 4 digits
- Keep CC documentation locked in a safe and secure filing cabinet
- Oversight of the “need-to-know” players
- Don’t allow unauthorized persons access to areas where data is stored
- Destroy documentation when no longer needed
- Document departmental payment card handling procedures

What merchant level does higher education fall into?



Level 1

Level 2





Level 3

Level 4

Level 5





Why is Risk in HE Growing?

Merchant Levels

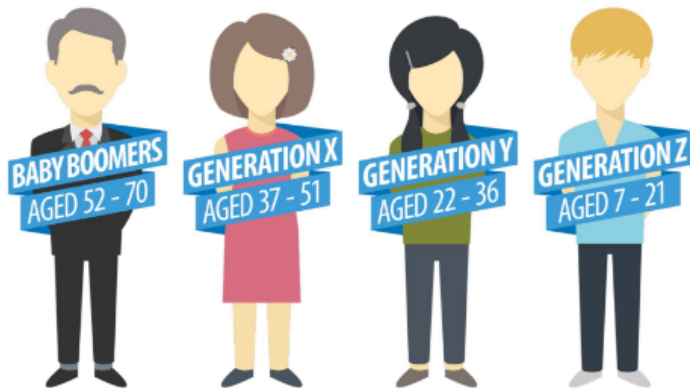
| Level |    |  |
|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| 1 | > 6 million Visa/MC txns/yr | > 2.5 million transactions/yr |
| 2 | 1 to 6 million Visa/MC txns/yr | 50,000 to 2.5 million txns/yr |
| 3 | 20,000 to 1 million Visa/MC ecommerce txns/yr | All other Amex Merchants |
| 4 | All other Visa/MC merchants | N/A |

Merchant Levels and Validation



| Level |    |  |
|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| 1 | <ul style="list-style-type: none"> • Annual on-site assessment (QSA) • Quarterly network scan (ASV) | <ul style="list-style-type: none"> • Annual on-site assessment (QSA) • Quarterly network scan (ASV) |
| 2 | <ul style="list-style-type: none"> • Annual on-site assessment (QSA/ISA) • Quarterly network scan (ASV) | <ul style="list-style-type: none"> • Quarterly network scan (ASV) |
| 3 | <ul style="list-style-type: none"> • Annual Self-Assessment Questionnaire (SAQ) • Quarterly network scan (ASV) | <ul style="list-style-type: none"> • Quarterly network scan (ASV) |
| 4 | <ul style="list-style-type: none"> • At discretion of acquirer • Annual SAQ • Quarterly network scan (ASV) | <ul style="list-style-type: none"> ▪ N/A |

Which generation is most at risk and susceptible to cyber attacks?



Millennials

Gen X

Baby
Boomers

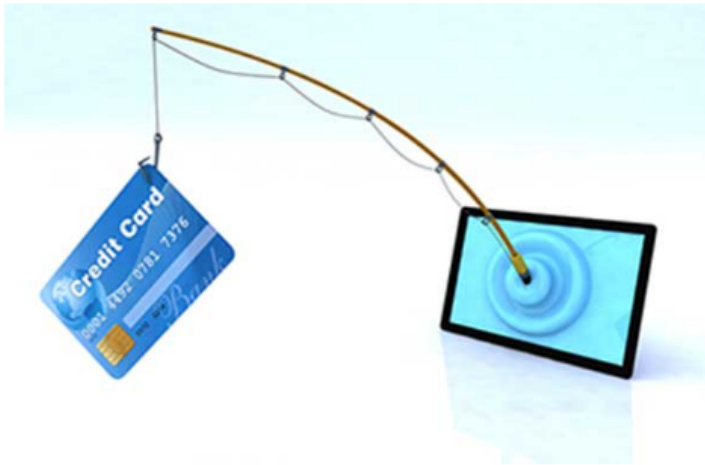
Gen Z

All equally
susceptible

Millennial Generation



A phishing email is when cyber criminals use emails as "bait" to fish for information.



True

False

Phishing scams

- Messages contain a sense of urgency
- Look authentic
- “Verify your account information”
- Verify with a direct phone call
- Do not click on links
- Always report to IT department

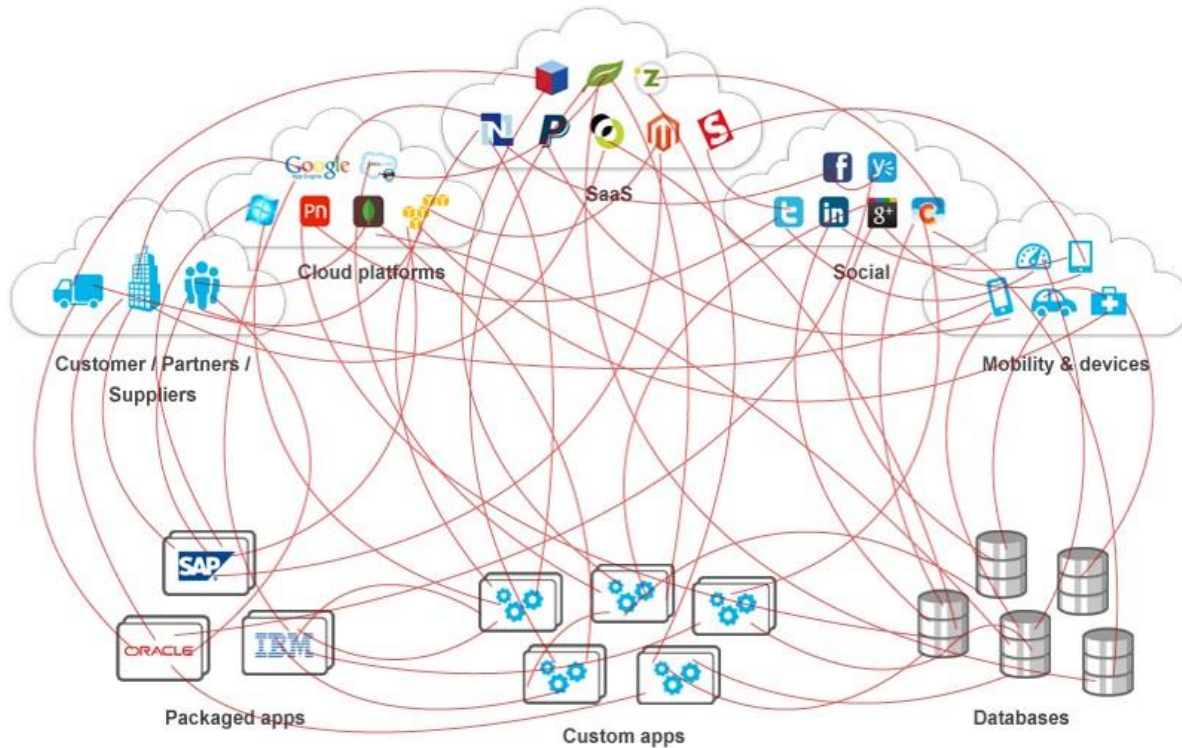
A fishing hook is shown with a yellow sticky note attached to its point. The sticky note contains the following text:

70% of cyber attacks rely on a combination of phishing and hacking

Multiple Points of Entry



What Higher Ed looks like...



Also known as...





Compliance

We suffered a data breach but we were fully validated as PCI compliant!

24/7/365 – it's an ongoing process

- Not just a yearly assessment
- Assessment measure a snapshot in time

PCI compliance is business as usual everyday

- 130+ criteria must be met



Who is HE accountable to?

- Federal Agencies
 - U.S. Department of Education (ED)
 - Federal Trade Commission (FTC)
 - Consumer Financial Protection Bureau (CFPB)
- State Agencies
- Private/Trade Associations
- Credit card associations





Rules and Regulations in HE

- PCI-DSS and PA-DSS
- Family Educational Rights to Privacy Act (FERPA)
- Telephone Consumer Protection Act (TCPA)
- Gramm/Leach/Bliley Act (GLBA)
- Truth-in-Lending Act (TILA)
- Fair Credit Reporting Act (FCRA)
- Title IV Cash Management regulations
- State-based service charge limitations

What has Nelnet learned?

How do we respond?

Team of 30+ security professionals

- Partnership with **CampusGuard**

Security Response Plan

- Determine and identify incident
- Containment
- Eradication
- Recover
- Lessons learned

Client communication—3 T's

- Transparency
- Timely response
- Team coordination



Nelnet Campus Commerce

Your trusted partner



- *25+ years in Higher Ed*
- *Fully PCI-DSS, FERPA, GLB, NACHA compliant*
- P2PE with Bluefin Payment Systems
 - Reduces PCI scope
 - Seamless integration
 - Increased security
 - Simplifies compliance
- Ingenico ePayments
 - Remote, tents sale





Websites of interest

Millennials vs. Boomers cybersecurity:

<http://www.uzado.com/blog/millennials-are-the-biggest-targets-for-cyber-attacks>

This is also related and interesting:

<http://www.nextgov.com/cybersecurity/2017/07/millennials-pose-greatest-it-security-risk-any-group-survey-says/139371/>

“Krebs on Security”, easy reading that gives a lot of information on some of the latest security news. <https://krebsonsecurity.com/>

DataBreach Today: <https://www.databreachtoday.com>

Educause Cybersecurity: <https://library.educause.edu/topics/cybersecurity>

HelpNetSecurity: <https://www.helpnetsecurity.com/view/news/>

World’s Biggest Data Breaches:

<http://www.informationisbeautiful.net/visualizations/worlds-biggest-data-breaches-hacks/>

Let's connect

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