

Internal Controls over Payment Cards

Continuing Professional Education
North Carolina Office of the State Controller*

Date:	October 13, 2015 10:00am – 11:30am
Location:	Office of the State Controller and Live Webinar
Objective:	To gain an understanding of the risks and control requirements associated with payment cards.
Content:	As the impact of cybersecurity incidents continues to rise, organizations and agencies are increasingly being pressured to demonstrate implementation of effective security controls to protect critical consumer data. Focused exclusively on payment card data, the Payment Card Industry (PCI) has continued to evolve its security frameworks and compliance requirements to address current trends and threats associated with payment card data. This presentation will provide attendees with an understanding of the origin and evolution of the PCI Data Security Standard, current trends and risks in the payment industry, and an overview of the requirements in the PCI DSS framework.
Instructors:	Alex Douds Senior Manager Dixon Hughes Goodman LLP Rodney Murray Principal Dixon Hughes Goodman LLP
CPE Credit Offered:	1.5 hours
Materials:	Will be provided in advance
Teaching Method:	Lecture
Prerequisites:	None
Advance Preparation:	None
Level:	Basic

* Click the following links for additional information about the [NC Office of the State Controller](#), the sponsor of this program, and [Dixon Hughes Goodman LLP](#) the developer of this program.

Biographies

Alex Douds

Senior Manager - Dixon Hughes Goodman LLP

Alex has over 14 years of experience in the fields of Internal Audit, IT audit and information security including the previous 6 years in a regional public accounting firms' Enterprise Risk Management practice. He has led a wide range of IT audits and business process controls audits including audits in the manufacturing, financial and healthcare industries. Audits have included responsibility for conducting clients' outsourced and co-sourced internal audits, as well as SOX 404 compliance, PCI compliance, and Service Organization Control (SOC) Reports. He also has experience consulting on systems implementation activities including pre implementation and post implementation reviews of ERP systems such as SAP and PeopleSoft, as well as other key client applications.

Rodney Murray

Principal - Dixon Hughes Goodman LLP

Rodney Murray leads the firm's IT Risk Advisory Services practice. Rodney has more than 25 years of experience in information technology and business applications, including providing internal audit and risk management services. His risk and advisory experience includes managing and performing technology risk and controls assessments, Sarbanes-Oxley compliance, HIPAA and GLBA privacy compliance, business process analysis, SOC reporting and assistance to internal audit functions. Rodney's client base includes financial institutions, hospitals and health care providers, state and local governments, manufacturers, hosting and application service providers and third party services providing financial transaction processing.

Prior to joining Dixon Hughes, Rodney worked for a Big Four accounting firm for over six years delivering IT risk and advisory services across all industry segments. His client base included community, regional and national banks, third party service providers to financial institutions, manufacturers, retailers, and state and local governments. Prior to public accounting, Rodney worked for Bank of America (formerly NationsBank) in the areas of computer operations, telecommunications, system conversion, and internal audit of corporate information systems.



PCI Compliance Overview

PCI DSS

Payment Card Industry Data Security Standard

- Standard that is applied to:
 - Merchants
 - Service Providers (Banks, Third-party vendors, gateways)
 - Systems (Hardware, software)
- That:
 - Store cardholder data – most common
 - Transmit cardholder data
 - Process cardholder data
- Applies to:
 - Electronic Transactions
 - Paper Transactions

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Types of Transactions

- Card Present - card is swiped through a POS terminal in a face-to-face transaction
- Card Not Present - are those transactions used in mail order, Internet, or telephone processing,

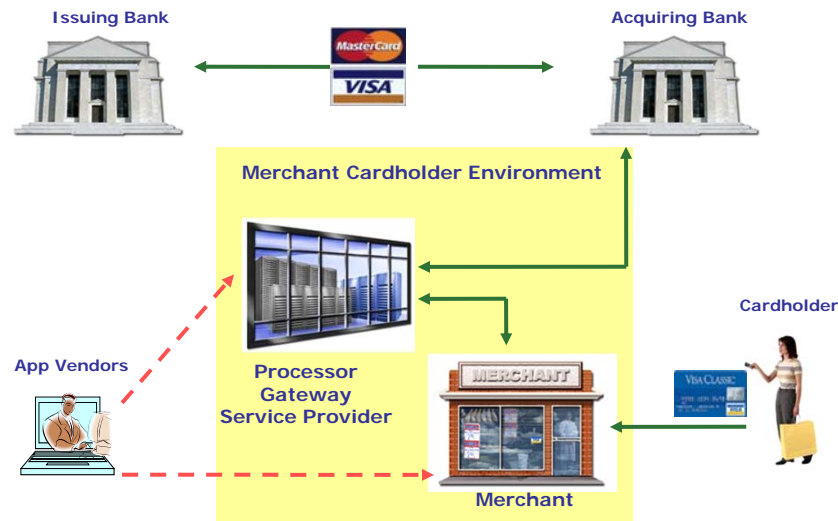
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Players in a Transaction

- The customer, the **“Cardholder,”** obtains his/her MasterCard or Visa credit card from an **“Issuing Bank”** (the bank that issued the card to the Cardholder.)
- The Merchant, obtains a **“Merchant Account”** from a **“Sponsoring Bank”** or an **“Acquiring Bank”** (both can be referred to as **“Merchant Banks”**). Merchant banks **“sponsor”** the merchant as a business qualified to accept credit cards.
- **“Processors or Service Providers”** are companies that process the credit card transactions through the bank system for you. Or companies that touch or hold credit card data in other ways such as data storage providers

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Transaction Diagram



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PCI Overview

- The Payment Card Industry (PCI) is comprised of:
 - Visa International
 - MasterCard Worldwide
 - Discover Financial Services
 - American Express
 - JCB



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PCI Council

- Payment Card Industry Security Standards Council LLC (PCI SSC – www.pcisecuritystandards.org)
 - Formed in September 2006 to:
 - Allow an open forum for the setting of cardholder security standards
 - Foster broad adoption of cardholder security standards
 - Create a unified, global system that is more accessible and efficient for all stakeholders – merchants, processors, point-of-sale vendors, financial institutions, and payment companies

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PCI Council (cont.)

- Payment Card Industry Security Standards Council LLC
 - Allow ‘Participating Organizations’ to be members and participate in the standards setting process
 - Responsible for maintaining and enhancing the PCI Data Security Standard
 - Responsible for development of new standards as necessary
 - Responsible for certifying Qualified Security Assessors (QSA) and Approved Scanning Vendors (ASV)

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Requirements

- The Standards have 6 Domains. Within the 6 Domains, there are 12 Requirements
 - Build and maintain a secure network (40 questions)
 - **Requirement 1** - Install and maintain a firewall configuration to protect cardholder data
 - **Requirement 2** - Do not use vendor-supplied defaults for system passwords and other security parameters
 - Protect cardholder data (32 questions)
 - **Requirement 3** - Protect stored cardholder data
 - **Requirement 4** - Encrypt transmission of cardholder data across open, public networks

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Card Brand Internal Programs Did Not Go Away

- Visa USA Cardholder Information Security Program (CISP)
- MasterCard International Site Data Protection (SDP) program
- American Express Data Security Operating Policy (DSOP)
- Discover Financial Services Discover Information Security & Compliance (DISC) program
- JCB data security program

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Instead They Were Refocused

- Retain control of:
 - Merchant levels
 - Service provider levels
 - Compliance criteria for merchants, service providers and other relevant organizations
 - ‘Safe Harbor’ standards
 - Other security related issues, as necessary

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General Merchant Classification Considerations

- Transaction volume is based on the aggregate number of transactions from a Doing Business As (DBA) or a given chain of stores
 - If a corporation has multiple chains, each chain is treated individually
- Up to processors and card brands to confirm an organization’s merchant level status
 - Just because a card brand’s table says you are a particular level does not necessarily mean you are that level of merchant

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General Merchant Classification Considerations

- A corporate entity with franchise locations will consider several factors in determining their level:
 - How many transactions per year go through the corporate-owned locations?
 - Does the corporation handle any transactions on behalf of franchisees?
 - Does the corporation hold a master processing agreement with the Acquirer on behalf of the franchisees?

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Visa Levels of Merchant Compliance

Tier	Transactions per Year	Types of Targets
1	➤ More than 6 million ➤ Anyone with breach	Merchants, Merchant Agents, Processors, Direct Connects
2	➤ 1 – 6 million	Merchants, Merchant Agents, Processors
3	➤ 20K – 1million	eCommerce Merchants
4	➤ All other Merchants	Merchants

- All must perform **and pass** external network scanning by Approved Scanning Vendor (ASV) to achieve compliance.
- **Level 1:** Annual onsite **Report on Compliance (ROC)** audit by a **Qualified Security Assessor (QSA)** and a quarterly network security scan with an ASV.
- **Level 2-4:** Completion of PCI DSS Self Assessment Questionnaire annually, **and** quarterly network security scan with an approved ASV.

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MasterCard Merchant Levels

Level 1	All merchants, including electronic commerce merchants, with more than 6M total MasterCard transactions annually. All merchants that experienced an account compromise. All merchants meeting the Level 1 criteria of a competing payment brand. Any merchant that MasterCard, at its sole discretion, determines should meet the Level 1 merchant requirements.
Level 2	All merchants with more than 1M total MasterCard transactions but less than 6M total transactions annually. All merchants meeting the Level 2 criteria of Visa.
Level 3	All merchants with annual MasterCard e-commerce transactions greater than 20K but less than 1M total transactions. All merchants meeting the Level 3 criteria of Visa.
Level 4	All other merchants.

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PCI Standards

- Data Security Standard (DSS)
- Report On Compliance (ROC) process
- Self-Assessment Questionnaires (SAQ) process
- External network security scan requirements
- Payment Application Data Security Standard (PA-DSS)

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PCI Data Security Standard (DSS)

- Within the six domains, there are 12 requirements
 - Regularly monitor and test networks
 - **Requirement 10** - Track and monitor all access to network resources and cardholder data
 - **Requirement 11** - Regularly test security systems and processes
 - Maintain an information security policy
 - **Requirement 12** - Maintain a policy that addresses information security for all personnel

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Reports on Compliance (RoCs)

- Typically conducted by a QSA
- Can be conducted by an internal audit group with a Officer of the organization signing the document. Issues we typically encounter with this approach:
 - Internal audit did not have the technical expertise
 - Internal audit did not understand the process
 - Internal audit did not understand what constitutes proper supporting documentation for proving compliance

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Self-Assessment Questionnaire (SAQ) Process

SAQ VALIDATION TYPE	DESCRIPTION	SAQ
1	Card-not-present (e-commerce or mail/telephone-order) merchants, all cardholder data functions outsourced. This would never apply to face-to-face merchants.	A
2	Imprint-only merchants with no electronic cardholder data storage	B
3	Merchants with web based virtual terminals, no electronic cardholder data storage	C-VT
4	Merchants with POS systems connected to the Internet, no electronic cardholder data storage	C
5	All other merchants (not included in Types 1-4 above) and all service providers defined by a payment brand as eligible to complete an SAQ.	D

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SAQ A

- Simplest SAQ of all
- Only covers the following DSS requirements
 - Requirement 9 – Restrict physical access to cardholder data
 - Requirement 12 – Maintain a policy that addresses information security for employees and contractors

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SAQ B

- Have to comply with 5 of the 12 DSS requirements
 - Requirement 3 - Protect stored cardholder data
 - Requirement 4 - Encrypt transmission of cardholder data across open, public networks
 - Requirement 7 - Restrict access to cardholder data by business need to know
 - Requirement 9 - Restrict physical access to cardholder data
 - Requirement 12 - Maintain a policy that addresses information security for employees and contractors

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SAQ C-VT

- Have to comply with 9 of 12 of the DSS requirements
 - However, only have to comply with a select number of relevant requirements within each of the domains

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External Network Security Scan

- Must be conducted by an Approved Scanning Vendor (ASV)
- Only necessary to test network components that face the Internet that process, store and/or transmit cardholder data
- Performed every Quarter and each scan must pass.

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Payment Application Data Security Standard (PA-DSS)

- What it is
 - Certification for any application that processes, stores or transmits credit card data
 - Applies only to a specific version of the application
 - Certifies that the application complies with the concepts of the PCI DSS
 - Certifies that cardholder data is properly processed, stored and/or transmitted by the application

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Payment Application Data Security Standard


- What it is NOT
 - Does NOT guarantee compliance with the PCI DSS when the application is implemented
 - Need to read the application's implementation guide or similar documentation to determine what PCI DSS issues may still have to be managed by you as part of or after implementation of the application
 - Application can still be storing cardholder data
 - PA-DSS (or PABP) compliance only assures you that the data is properly protected by encryption and other methods

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- BEWARE – some application vendors believe that PA-DSS compliance gets them off the hook regarding PCI DSS compliance. This is not true.

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Is Stealing Credit Card Data Worth It?



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[23:56] <ccs4santa> hey
[23:56] <ccs4santa> u selling fullz and cc# with cvv2?
[00:00] <nakdollar> yes
[00:04] <ccs4santa> how much for a fullz?
[00:13] <nakdollar> 100$
[00:14] <ccs4santa> ok..how much for card number and ccv2 info?
[00:15] <nakdollar> same
[00:16] <ccs4santa> ok..you also sellin bank logins...boa / wells / EU / UK?
[00:17] <nakdollar> yes
[00:17] <ccs4santa> bank logins vary or...?
[00:18] <nakdollar> yess
[00:20] <ccs4santa> how much for bank logins?
[00:21] <nakdollar> 320$

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So What is the Potential Risk/Cost?

- Members proven to be non-compliant or whose merchants or agents are non-compliant may be assessed:
 - Non-compliance fine (egregious violations up to \$500K)
 - Forensic investigation costs
 - Issuer/Acquirer losses
 - Unlimited liability for fraudulent transactions
 - Potential additional Issuer compensation (e.g., card replacement)
 - Dispute resolution costs

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“Safe Harbor” Status

- Submission of a Report On Compliance (ROC) or a Self-Assessment Questionnaire (SAQ) that says an organization is compliant with the PCI DSS in and of itself does NOT provide an organization “Safe Harbor” status
 - Compromised organization MUST have adhered to ALL of the requirements at the time of the breach
 - The forensic examination MUST confirm that ALL requirements were adhered to at the time of the breach

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Current Trends and Risks - Europay, MasterCard and Visa (EMV)

- **What EMV is:**
 - It is counterfeit card fraud protection – it makes it more difficult for bad guys to make use of stolen card data.
 - Credit cards are equipped with a super-small computer chip that’s extremely hard to counterfeit.
- **What EMV is not:**
 - It is not encryption – EMV does not encrypt the Primary Account Number (PAN) and therefore the card data must still be protected according to PCI guidelines.
 - It is not helpful for ecommerce transactions – EMV only works for card present transactions.
 - EMV technology does not satisfy any PCI requirements, nor does it reduce PCI scope.

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Point to Point Encryption (P2PE)

- A P2PE solution is provided by a third party solution provider, and is a combination of secure devices, applications and processes that encrypt data from the point of interaction (for example, at the point of swipe or dip) until the data reaches the solution provider's secure decryption environment.
- The P2PE solution provider is a third-party entity (for example, a processor, acquirer, or payment gateway) that has overall responsibility for the design and implementation of a specific P2PE solution, and manages P2PE solutions for its merchant customers.
- By using P2PE, payment card data is unreadable until it reaches the secure decryption environment, which makes it less valuable if the data is stolen in a breach. PCI-listed P2PE solutions can also reduce the scope of the cardholder data environment, which helps simplify compliance efforts with the PCI Data Security Standard.

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Tokenization

- The PCI Council defines tokenization as "a process by which the PAN is replaced with a surrogate value called a token." De-tokenization is the reverse process of redeeming a token for its associated PAN value.
- When a payment card authorization request is made to verify the legitimacy of a transaction, a token might be returned to the merchant instead of the card number, along with the authorization code for the transaction. The token is stored in the receiving system while the actual cardholder data is mapped to the token in a secure tokenization system.
- Tokenization eliminates electronic CHD from being stored in the merchant environment. This means the merchant does not need to focus as much on the storage and retention of a customers' CHD for PCI compliance.
- The merchant can even retain the token for secure recurring payments or for customers who choose to retain their CHD on file.

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Internal Controls Over Payment Cards

October 13, 2015

Attendees by Last Name (334)

Jennifer Acton-UNC at Chapel Hill
Fatima Acurio Gonzalez-Central Piedmont Community College
Jeani Allen-Department of Public Instruction
Lisa Allnut-Department of State Treasurer
Shelly Alman-Gaston College
Patrick Amihere-UNC at Chapel Hill
Lewis Andrews-Department of State Treasurer
Cynthia Armes-Department of Natural and Cultural Resources
Leslie Arrington-NC School of Science and Mathematics
Lamees Asad-UNC at Chapel Hill
Steven Ayers-East Carolina University
Phillip Ayscue-Department of Transportation
Debra Bailey-East Carolina University
Terry Bailey-Rockingham Community College
Catherine Baker-Administrative Office of the Courts
William Ball-Administrative Office of the Courts
Vera Balmer-NC Central University
Abdul Baloch-Department of Administration
Brent Barbee-Richmond Community College
Leslie Barber-NC Housing Finance Agency
Kim Battle-Department of State Treasurer
Deana Bauer-Randolph Community College
Irwin Benjamin-Department of State Treasurer
Krista Bigelow-Department of Public Instruction
Michael Bingham-Western Piedmont Community College
Jennifer Blair-UNC at Chapel Hill
Eric Blaize-Department of Secretary of the State
Leslie Blankenship-Isothermal Community College
Thomas Bolvin-Department of Natural and Cultural Resources
Dee Bowling-East Carolina University
Janice Boyce-Department of Justice
Jessica Boyce-Central Piedmont Community College
Vicki Braddy-Department of Public Safety
Nancy Brendell-Western Carolina University
Dorian Britt-NC A and T State University
Susan Broadley-USS North Carolina Battleship Commission
Dawn Brooke-Department of Agriculture
Jessica Brower-Montgomery Community College
Taylor Brumbeloe-Office of the State Controller
Suzanne Bryson-UNC at Asheville
Helen Buck-NC A and T State University
Kimberly Buffkin-USS North Carolina Battleship Commission
Kirsten Bunch-Blue Ridge Community College
James Burke-Department of State Treasurer
Shannon Byers-Office of State Budget and Management
Melinda Canady-Department of State Treasurer
Darlene Carpenter-Department of Agriculture
Kevin Carraway-East Carolina University
Tim Carroll-NC Housing Finance Agency
Samantha Carter-Department of Transportation
Kathey Carthens-Department of Public Safety
Wynona Cash-Office of the State Controller
Steve Chase-Wildlife Resources Commission
Tommy Clark-Department of Secretary of the State
Betsy Cline-Stanly Community College
Darrus Cofield-Department of State Treasurer
Bruce Cole-Gaston College
Stephanie Coleman-East Carolina University
Manasa Cooper-Department of State Treasurer
Darlene Cope-Blue Ridge Community College
Dorene Creech-Department of Transportation
Tama Creef-Department of Natural and Cultural Resources
Stephanie Cronk-Department of Revenue
Jo Lynne Daughtry-East Carolina University
Amanda Davis-UNC Hospitals
Cecil Davis-Lenoir Community College
Diane Davis-NC A and T State University
Joshua Davis-Department of Natural and Cultural Resources
Matthew Davis-Department of Agriculture
Steven Davis-Carteret Community College
Teresa Davis-East Carolina University
Joyce Davis-Freeman-Department of Environment Quality
Robin Deaver-Fayetteville Technical Community College
Yolanda Deaver-NC Central University
Sheila Dockery-Bladen Community College
Cynthia Duarte-NC Central University
Angela DuBose-NC A and T State University
Ryan Dupree-Department of Public Instruction
Kenneth Durham-Department of State Treasurer
Michael Durkin-Department of Transportation
Tara Eason-Elizabeth City State University
Cecilia Edgar-Wildlife Resources Commission
Bambi Edwards-Craven Community College
Cindy Edwards-Wildlife Resources Commission
Felicia Edwards-Department of Public Instruction
Elizabeth Elder-Department of Public Safety
Laresia Everett-Department of Insurance
Bonaventure Ezewuzie-Department of State Treasurer
Joel Faison-NC Central University
Monisia Farrington-UNC at Chapel Hill
Sheilah Faucette-Elizabeth City State University
Katelynn Fehn-UNC at Asheville
Stephanie Fisher-Stanly Community College
Frances Flowers-East Carolina University
Craig Forsythe-Office of Information Technology Services
Denise Foutz-Appalachian State University
Nancy Foxx-Western Carolina University
Elaine Freeman-Department of Commerce
Patricia Fritz-East Carolina University
Etta Gallaway-Department of Agriculture
Sheila Galloway-Brunswick Community College
Teresa Gault-UNC at Chapel Hill
Peggy Gill-Department of Transportation
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Christina Greene-Cape Fear Community College
Charles Gullette-East Carolina University
Oscar Gutierrez-Lenoir Community College
Vivian Hailey-Central Piedmont Community College
Kevin Hale-East Carolina University
Michelle Hall-Fayetteville Technical Community College
Clay Hallock-East Carolina University
Jeff Harding-NC A and T State University
Timothy Harrell-Department of Public Safety
Rebekah Hartberger-UNC at Charlotte
Lori Hathaway-East Carolina University
Colette Hatley-Stanly Community College
M'Shiela Hawthorne-NC State University

Elizabeth Haynes-USS North Carolina Battleship Commission
Thomas Henry-Halifax Community College
Jeff Hill-Central Piedmont Community College
Regina Hill-Office of State Budget and Management
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Tommy Kirby-Wildlife Resources Commission

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Janet Rust-Department of Labor
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Sherry Smith-Gaston College
Susan Ann Smith-Wildlife Resources Commission
Teri Smith-UNC at Chapel Hill
Alison Soles-Southeastern Community College
Joyce Spivey-Department of Natural and Cultural Resources
Karen Staab-Department of Public Safety
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Vicki Stevens-USS North Carolina Battleship Commission
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Amber Wilkes-Department of Health and Human Services
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Mary Susan Williams-Department of Agriculture
Rebecca Williams-UNC General Administration

Susan Williams-UNC at Chapel Hill
Cassandra Wilson-Department of State Treasurer
Joe Wilson-Department of Transportation
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David Yokley-Department of Revenue
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Anthony Zeltmann-Department of Revenue

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Drake Kane-Administrative Office of the Courts

Jordan Samuel-Administrative Office of the Courts

Wendy Sutton-Administrative Office of the Courts

Denise Foutz-Appalachian State University

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Dwayne Odvody-Appalachian State University

Susan Poole-Appalachian State University

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Shaomin Li-Asheville-Buncombe Tech Community College

Sheila Dockery-Bladen Community College

Ginger King-Bladen Community College

Bridgette Singletary-Bladen Community College

Kirsten Bunch-Blue Ridge Community College

Darlene Cope-Blue Ridge Community College

Lisanne Masterson-Blue Ridge Community College

Tammy Pryor-Blue Ridge Community College

Samantha Reynolds-Blue Ridge Community College

Jessica Rogers-Blue Ridge Community College

Sheila Galloway-Brunswick Community College

Christina Greene-Cape Fear Community College

Kathy Reeves-Cape Fear Community College

Steven Davis-Carteret Community College

Kary Porter-Carteret Community College

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Jessica Boyce-Central Piedmont Community College

Vivian Hailey-Central Piedmont Community College

Jeff Hill-Central Piedmont Community College

Rosalynn Hoang-Central Piedmont Community College

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Linda Kempf-Central Piedmont Community College

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Barbara Lukens-Central Piedmont Community College

Elena Randolph-Central Piedmont Community College

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Meera Vora-Central Piedmont Community College

Mike Whiteman-Central Piedmont Community College

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Christine Hurst-Craven Community College

Christine Jonas-Craven Community College

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John Storment-UNC Hospitals
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Kimberly Buffkin-USS North Carolina Battleship
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Elizabeth Haynes-USS North Carolina Battleship
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