

2017 Financial Institution Payments Fraud Mitigation Survey

Report of Results

Amanda Dorphy and Heather Hultquist Payments, Standards, and Outreach Group Federal Reserve Bank of Minneapolis



Table of Contents

Executive Summary	3
Respondent Demographics	6
Payment Fraud Trends	12
Payments Fraud Mitigation	18
 Account Application Processes Debit Card Credit Card Check ACH Wire Internal Procedures and Controls 	20 23 28 34 41 47 52
Barriers and Opportunities	54
Data Tables	58

The authors thank colleagues at the Federal Reserve Banks of Minneapolis and Chicago for their assistance in preparing the survey and this report. The views expressed in this report are those of the authors and are not necessarily those of the Federal Reserve Bank of Minneapolis or any other component of the Federal Reserve System. The information in this report is intended for educational purposes and the description of survey results, or the mention or display of a trademark, proprietary product, or firm in this report does not constitute an endorsement or criticism and does not imply approval to the exclusion of other suitable products or firms.

Executive Summary



Staff at the Federal Reserve Bank of Minneapolis have conducted research on payments fraud mitigation since 2007. During July and August 2017, the <u>Federal Reserve Bank of Minneapolis' Payments, Standards, and Outreach Group</u> fielded a qualitative, online survey of financial institutions (FIs) from across the U.S. on payments fraud mitigation. There are 283 respondents, representing about a 5.8% response rate.

The survey report contains information about the most frequent fraud attacks by payment type – debit card, credit card, check, ACH, and wire – that FIs are experiencing and the usage and relative effectiveness of payments fraud mitigation methods. Risk mitigation methods for each payment type are grouped into three categories:

- 1. transaction screening/scoring,
- 2. authentication methods, and
- 3. other reporting and risk management methods.

Aggregate results are presented in the first half of this report. On each page, summary remarks, the question posed in the survey, and a chart reflecting results are provided. Data tables shown in the second half of the report provide results by financial institution size. A copy of this report and definition of terms used in the survey may be found on the <u>Federal Reserve Bank of Minneapolis' Payments</u>, Standards, and Outreach Group website.

Key Findings

<u>General</u>

- Payment fraud losses continue to be a problem for FIs: three out of four survey respondents report incurring fraud losses.
- Nearly all FIs provide customers access to online information services to view transactions, statements, etc. The effectiveness rating of online information services in mitigating fraud is somewhat high. About half of the FIs rate it as very effective. This rating applies to all payment types, even wire transfers where speed and finality are a core feature. This finding seems to indicate that when other methods fail, the customer is relied on to identify fraudulent transactions. At the same time many FIs provide customer education on fraud mitigation; however, this is rated low in effectiveness.

Executive Summary



<u>Cards</u>

- Ninety-six percent of the respondents that are debit card issuers and 77% of credit card issuers experienced card fraud losses in 2016. Increases in losses are more prevalent on debit and credit cards compared to other payment types. Fraud losses increased in 2016 compared to 2015 on debit cards (63% of FIs) and credit cards (41% of FIs).
- The most frequent card fraud attacks are counterfeit cards used at point-of-sale and fraudulent use of account numbers online. Eighty-one percent of the FIs that offer debit cards and 91% of the FIs that offer credit cards stated they have adopted chip card technology. Use of chip technology is a method to help thwart counterfeit card fraud attacks at point-of-sale.
- For card transactions (debit and credit), 70% of respondents use seven of 11 data types listed in the survey in their fraud screening and scoring tools, indicating a layered approach is being applied. *Identifying transactions initiated in countries perceived as high risk* is considered a key data type in screening/scoring transactions and is rated most effective. Other data with high adoption rates are rated moderately effective.

Checks

- Seventy-seven percent of FIs that offer check experienced fraud losses in 2016.
- The three most frequent check fraud attacks are altered or forged checks presented for payment, counterfeit checks presented for payment, and counterfeit checks deposited.
- Two-thirds of FIs use five of the 11 check fraud screening and scoring methods. Of those five methods, only 42% of FIs under \$50 million in assets use duplicate check detection on deposit or paid items compared to over 70% by FIs in other size categories. More than 80% of FIs use funds availability holds with half rating the application of exception holds on funds availability as very effective and 40% reporting the same for routinely applying standard check holds.

<u>ACH</u>

- Twenty-four percent of FIs that offer ACH experienced fraud losses in 2016.
- Eight out of 10 FIs rank fraudulent or unauthorized debits against consumer accounts as the number one most frequent attack. Fraudulent or unauthorized debits against business accounts is ranked second.
- Manual review processes are used by over 80% of FIs. Nearly half the FIs using manual review processes rate them as very
 effective. Screening for anomalous behavior has a higher use rate by large FIs (74% of those \$1 billion or more in size) and is
 rated very effective by four out of 10 large FIs.

Executive Summary



Wire

- Thirteen percent of FIs that offer wire experienced fraud losses in 2016.
- Business email compromise (BEC) attacks and consumer-victim frauds (frauds targeting consumers) are identified as the most frequent wire fraud attacks. However, for small FIs (under \$50 million in assets) none of the respondents rank BEC attacks first or second and only 5% rank them third as a most frequent attack. In contrast, 74% of the largest FIs (over \$1 billion in assets) rank BEC attacks number one and 91% indicate it is in the top three.
- Three of the nine authentication methods for wire transfers that are listed in the survey are used by over 80% of FIs, and over all these are rated as very effective. The top three are telephone callback verification, dual control/approval for originating company wire initiation, and signature verification. Although adoption is somewhat lower on limiting consumer wires to in-person requests with a valid government ID and multifactor authentication with originating company, these methods are rated high in terms of effectiveness. Given the top attacks identified, some of the less used authentication methods might help mitigate these attacks.
- Although consumer-victim frauds are a concern, 7% of respondents won't refuse to send a consumer-initiated wire even when the FI suspects a fraud scheme.

Barriers and Opportunities to Mitigate Payments Fraud

- From a list of six potential barriers, the top two constraints are costs to implement fraud detection tools/methods and consumer data privacy regulatory restrictions/other concerns if data shared with others to help mitigate fraud.
- Respondents answered an open-ended question on what new and improved methods are needed to help mitigate payments fraud. Opportunities relate to the following five themes are raised most:
 - Improved information sharing
 - Identity verification
 - Improved automation and analytics
 - Stakeholder liability changes
 - Increased adoption of existing methods



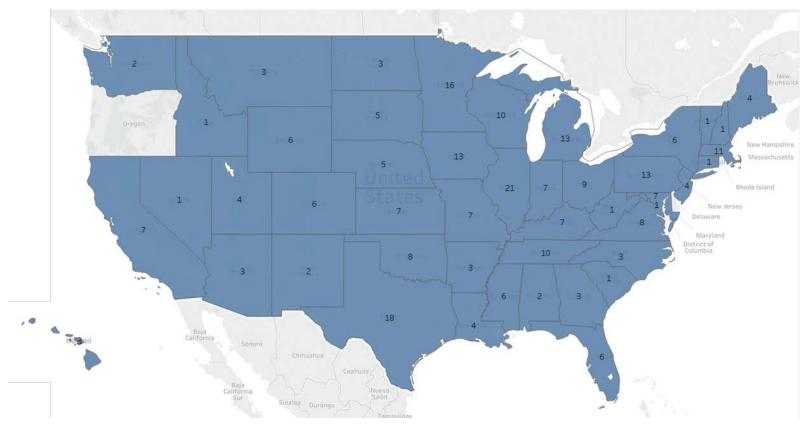
Respondent Demographics

Respondent Demographics



283 banks and credit unions headquartered across the country responded to the survey¹.

Respondents by State Location of Head Office

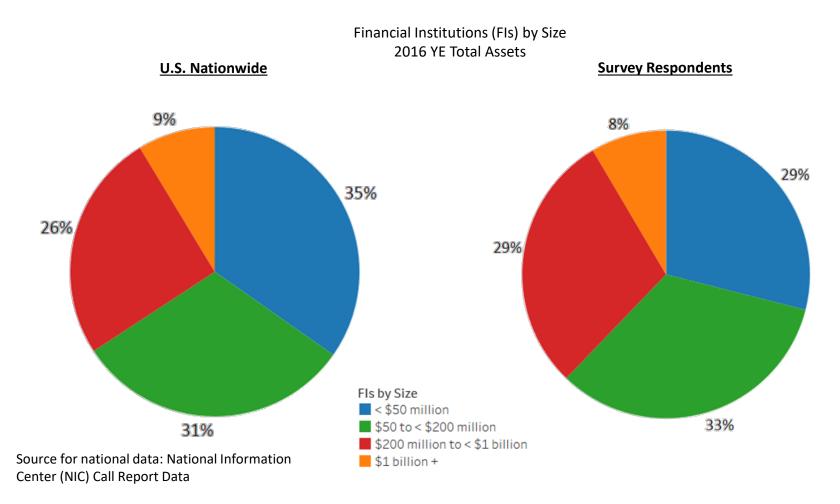


¹ References to banks in the report include cooperative banks, federal savings banks, national banks, state nonmember banks, savings and loan associations, state member banks, and state savings banks. Credit unions include federal credit unions and state credit unions.

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Respondent Demographics – Correlate to U.S.

The mix of respondents based on size (total assets) is a close match and reflective of FIs in the U.S.

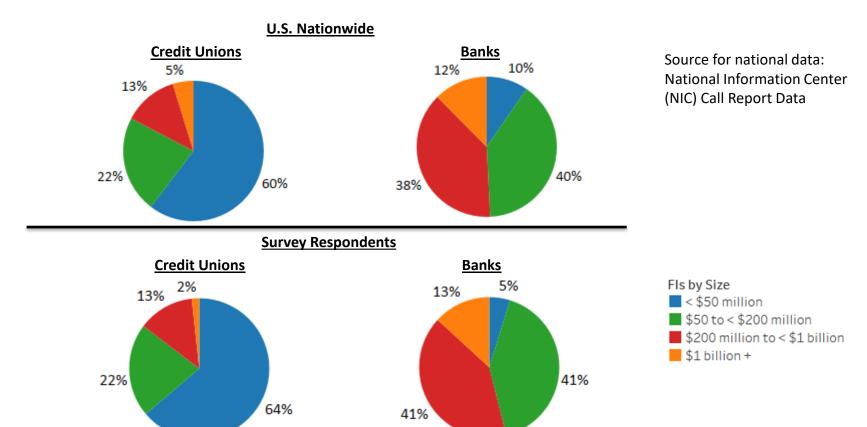






Nationally and among survey respondents, the majority of those under \$50 million in assets are credit unions.

Financial Institutions by Type and Size 2016 YE Total Assets







Seventy percent of respondents said the primary users of their payment products are consumers. This includes all of the credit union respondents, which make up 41% of the survey participants.

What type of customers are the predominant users of your financial institution's payment products and services?

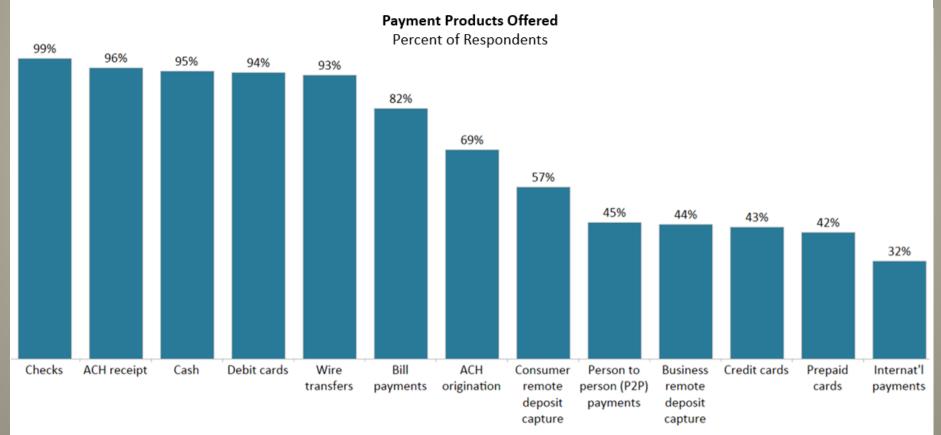
Customer Type	Percent of Respondents
Primarily consumers	70%
Primarily business/commercial	5%
Both, somewhat even	25%



Payment Products Offered by Respondent Fls

Traditional payment products except credit cards are offered by most financial institutions. Only 43% of respondents offer credit cards, which for purposes of the survey, is defined as issuing cards and carrying the associated accounts receivable.

Which of the following payment products does your financial institution offer?





Payment Fraud Trends





A greater portion of smaller FIs, those under \$50 million in assets, reported no payment fraud attempts (38%) and no fraud losses (45%). Whereas, over 80% FIs in all other asset-size segments reported that they experienced payment fraud attempts and losses.

Did your financial institution experience any payment fraud attempts and losses in 2016?

Fraud Attempts	Respondent Size - Total Assets in Millions of Dollars						
	All	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+		
Yes	82%	57%	88%	95%	100%		
No	16%	38%	11%	4%	-		
Don't know	2%	5%	1%	1%	-		

Fraud Losses	Respondent Size - Total Assets in Millions of Dollars							
	All	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+			
Yes	75%	46%	85%	83%	100%			
No	22%	45%	13%	14%	-			
Don't know	4%	9%	2%	2%	-			

Payment Fraud Attempts

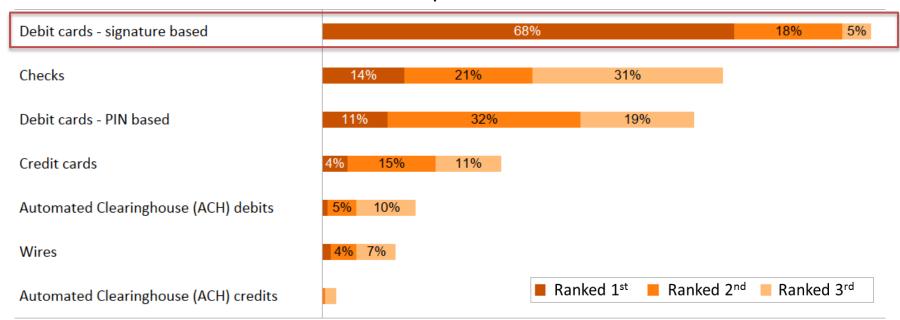


Over 90% of the respondents that track fraud attempts ranked signature-based debit cards among the top three payments having the highest number of fraud attempts. Sixty-six percent of respondents state check fraud attempts are in the top three payment types having the highest number of fraud attempts.

Although credit cards are fourth on the chart below, this does not imply that credit cards experience less fraud attempts compared to other payments. Only 43% of respondents offer credit cards.

Indicate the payment types where your financial institution experienced the highest number of fraud attempts in 2016. Consider all attempts regardless of actual financial losses.

Results for All Respondents



FIs are only asked about the payment types they offer.

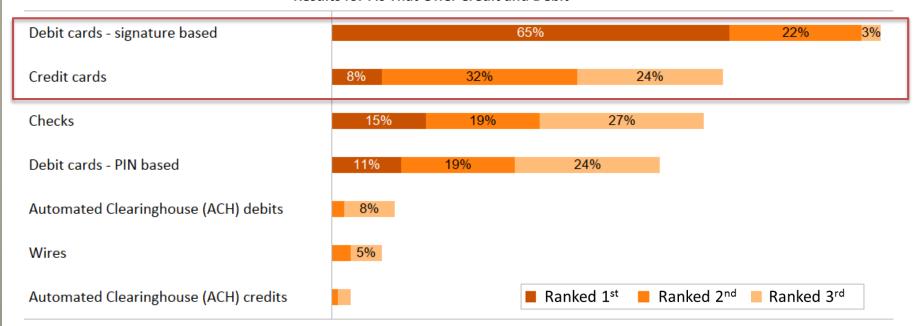
Payment Fraud Attempts by Those That Offer Credit and Debit Cards



While only 43% of the respondents offered credit cards, for those that do (chart below), credit cards are cited in the top three payments with the highest number of fraud attempts by 64% of institutions surpassing both PIN debit and checks. However, signature-based debit cards are still reported as having the highest number of fraud attempts.

Indicate the payment types where your financial institution experienced the highest number of fraud attempts in 2016. Consider all attempts regardless of actual financial losses.

Results for FIs That Offer Credit and Debit



FIs are only asked about the payment types they offer.

Payment Fraud Losses



As discussed on page 13, three out of four of the survey respondents incurred fraud losses. FIs that experienced any payments fraud losses are asked about losses associated with the payments they offer:

- Over 75% of FIs experienced card fraud losses. Although PIN authentication is viewed as very effective, four out of five FIs still have PIN-based debit card losses.
- Check losses are common too; 74% of FIs have reported check fraud losses. However, only 48% of respondents under \$50 million in assets reported check fraud losses.
- Less than 25% of FIs have ACH, wire, and prepaid cards fraud losses. A notable difference, 57% of large FIs (those over \$1 billion in size) report ACH debit fraud losses.

On which payment types did fraud losses occur?

	Losses		No Losses	S	Don't Know	
Debit cards - signature based	0	96%	•	2%	•	2%
Debit cards - PIN based	\circ	81%	0	14%	0	5%
Credit cards	0	77%	0	16%	0	7%
Checks	0	74%	0	23%	0	3%
Automated Clearinghouse (ACH) debits	0	23%		69%	0	8%
Wires	0	13%	\circ	84%	0	3%
Automated Clearinghouse (ACH) credits	0	8%	\circ	86%	0	6%
Prepaid cards	0	7%	\circ	86%	0	7%

FIs that incurred any payments fraud losses are asked about losses on payment types they offer.

Payment Fraud Losses: 2016 Compared to 2015



FIs reported fraud loss increases on multiple payment types. Increases are more prevalent on debit and credit cards. Although the number of checks written has dropped precipitously over the last decade², 28% of respondents saw growth in check fraud losses.

For your financial institution, how have losses due to payments fraud changed in 2016 compared to 2015?

	Increased Stayed the Same		Decreased		Don't Know			
Debit cards - signature based	0	63%	0	19%	0	15%	0	4%
Debit cards - PIN based	0	50%	0	33%	0	12%	0	6%
Credit cards	0	41%	0	32%	0	16%	0	11%
Checks	0	28%	0	47%	0	20%	0	5%
Wires	0	10%	\bigcirc	77%	•	3%	0	10%
Automated Clearinghouse (ACH) debits	0	8%	\bigcirc	79%	0	4%	0	8%
Prepaid cards	0	6%	\bigcirc	76%			0	18%
Automated Clearinghouse (ACH) credits	۰	2%	\bigcirc	83%	0	4%	0	12%

FIs are only asked about the payment types they offer.

²Source Federal Reserve Payments Study, 2016 and 2013.



Payments Fraud Mitigation

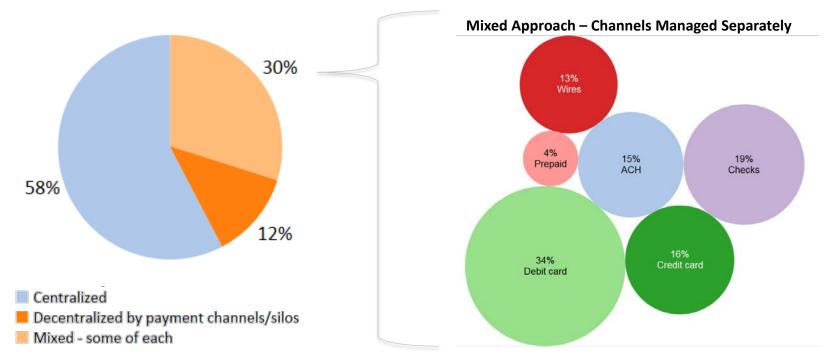
Fraud Prevention Approach



A centralized approach to fraud prevention and investigation is used by 58% of respondents, meaning they concentrate authority for managing fraud risk and associated activities in one area. Twelve percent use a decentralized approach where fraud risk is managed independently for each payment channel. Lastly, 30% of the FIs take a mixed approach. Cards are the most common payment where fraud risk is managed separately.

Large FIs (those over \$1 billion in assets) manage fraud differently, with 33% reporting centralized, 17% reporting decentralized, and 50% reporting a mixed approach.

At your financial institution is fraud prevention/investigation a centralized function, is it decentralized by payment channel/silo, or is it some of each? (left chart) If mixed, which payment channels are managed separately? (right chart)





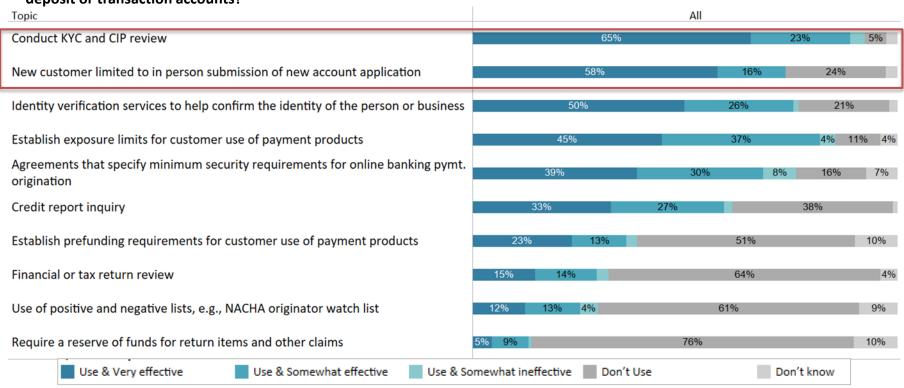
Account Application Processes

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New Deposit Account Fraud Mitigation

Conduct know your customer (KYC) and customer identification programs (CIP) review, and new customer limited to in-person submission of new account application are considered most effective relative to other account application processes in mitigating payments fraud. All FI respondents over \$1 billion in size use KYC and CIP programs, and 75% state these methods are very effective. Only 45% of the large FIs limit account opening processes to in-person application submissions with slightly over half of those rating it very effective.

Which account application processes does your financial institution use to mitigate risks when establishing new demand deposit or transaction accounts?

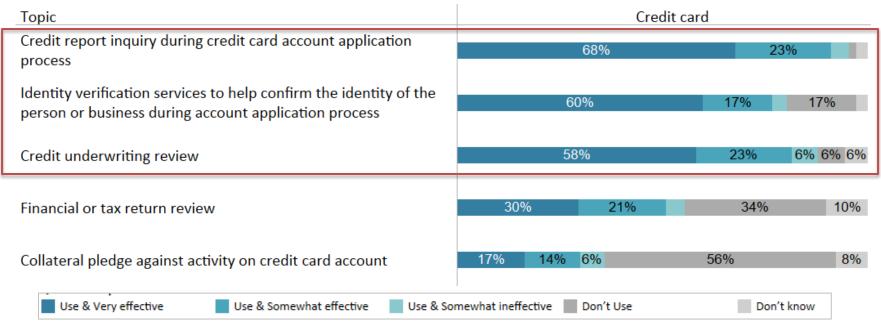


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Credit Card Application Fraud Mitigation

Over 80% of FIs use three of the five credit card account application processes (below) with over two-thirds of the FIs rating them as very effective. Note, as shown in the credit card attacks section that follows, application fraud (fraudulent credentials or other data used to establish new credit card accounts) is not identified as a top fraud attack.

Which of the following account application processes does your financial institution use to mitigate credit card fraud risks?



FIs that offer credit cards are asked this question.



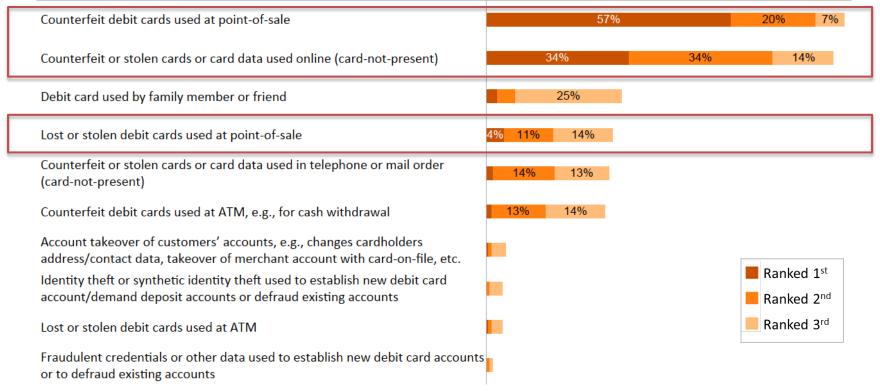
Debit Card Fraud Attacks and Mitigation

Debit Card Fraud Attacks



Eight out of 10 FIs reported *counterfeit debit cards used at point-of-sale* and *fraudulent use of card data online* as the most often used fraud attacks. Combined, these two attacks are ranked as the top debit card attacks by 90% of FIs that offer debit cards. *Lost and stolen card used at point of sale* attacks are ranked relatively low, and PIN authentication is generally associated as a primary mitigation method.

What are the three current fraud attacks most often used to initiate debit card fraud against your financial institution or your customers' accounts?



Debit Card Fraud Mitigation - Authentication

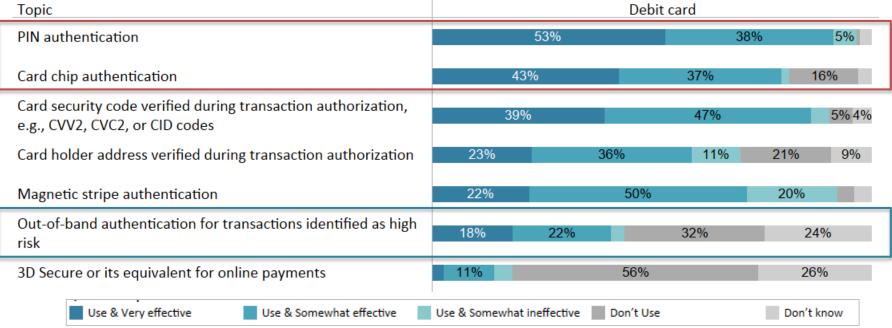


For debit cards, *PIN authentication* has the highest adoption rate and effectiveness rating. Eight out of ten FIs report they are issuing *chip cards for authentication* illustrating that the industry is progressing with chip card adoption. Forty-three percent said *chip card authentication* is very effective. While *mag stripe authentication* is widely used, respondents give it a less favorable rating; 20% said it is somewhat ineffective.

Forty-three percent of respondents use *out-of-band authentication for transactions identified as high risk*; however, less than half of those using the method consider it very effective.

About three out of 10 large institutions (\$1 billion or more in assets) use 3D secure or its equivalent for online payments; however, none of them rate this method as very effective and two-thirds of those institutions rated it somewhat ineffective.

Which of the following transaction authentication methods does your financial institution use to mitigate debit card fraud risks?

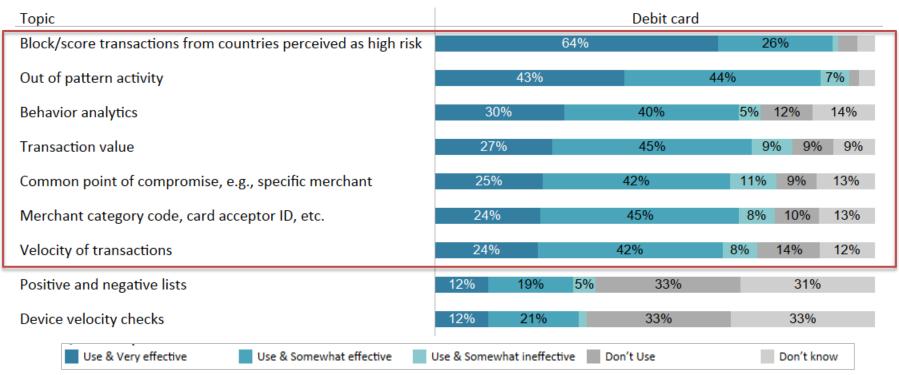


Debit Card Fraud Mitigation – Screening/Scoring



It is noteworthy that in the next section the data shows that 65% of respondents outsourced their card fraud management, which may impact the data that they are able to use versus what they would like to use. Seven types of data listed are used by 70% of FIs in their fraud screening tools. This seems to illustrate the need to incorporate many types of data to develop sophisticated fraud detection rules that look at the combination of data factors. Most of the seven types of data are rated moderately effective. Blocking/scoring transactions from countries perceived as high risk is rated very effective. Behavior analytics and velocity of transactions data are used by more of the larger FIs.

Which of the following data does your financial institution incorporate into fraud screening tools to mitigate debit card fraud risks?

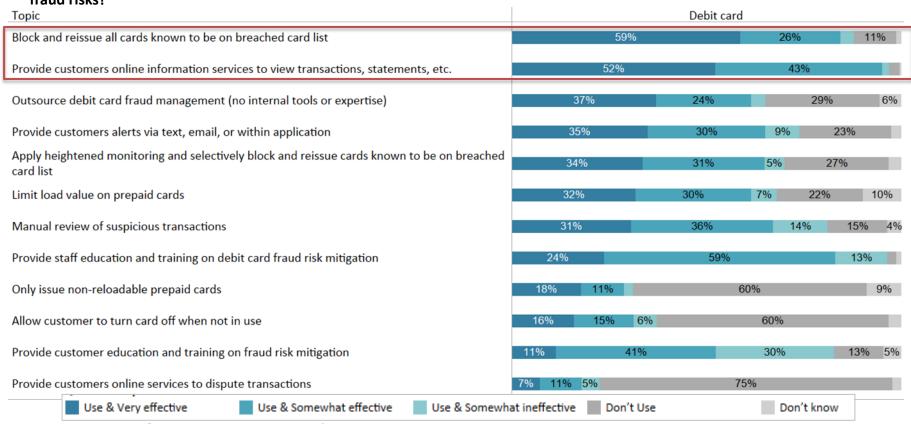


Debit Card Fraud Mitigation – Reporting and Other Risk Management Methods



Blocking and reissuing cards known to be on the breached card list has the highest effectiveness rating and is rated very effective by 59% of respondents. Nearly all FIs provide customers access to online information service to view transactions and statements. The effectiveness rating, which is somewhat high, seems to indicate some reliance on customers detecting fraud when other methods did not block the transaction from occurring.

Which of the following reporting and other risk management methods does your financial institution use to mitigate debit card fraud risks?





Credit Card Fraud Attacks and Mitigation

Credit Card Attacks



Card-not-present fraud attacks online are in the top three attacks for 89% of FIs that issue credit cards (see chart, page 30). According to the Federal Reserve Payments Study, remote debit and credit card transactions account for 22% of card transactions by number in 2016 and 44% by value. Actual fraud via remote channels accounted for 58.5% of general purpose card fraud (see Federal Reserve Payments Study 2017 Annual Supplement).

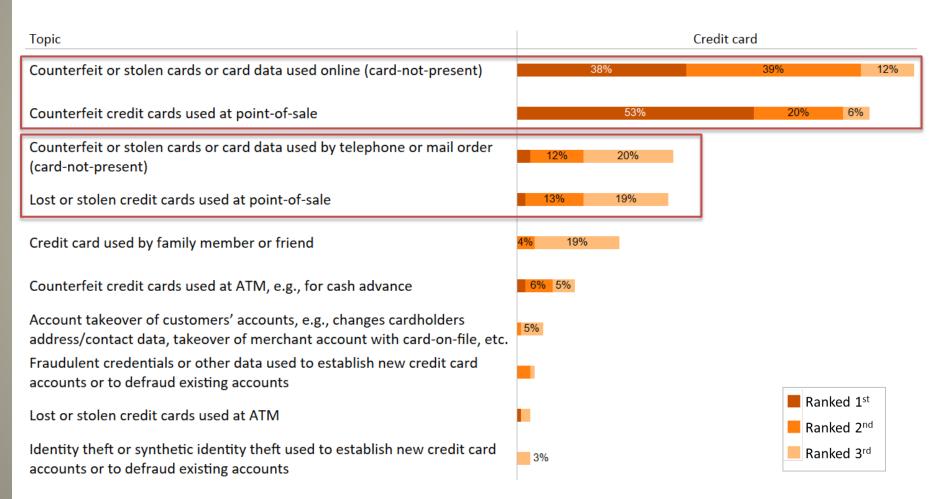
Findings in this study confirm online transactions, as a share of card payments, are more likely to be fraudulent. Although 53% of FIs said that attacks using *counterfeit credit cards at point-of-sale* are the most frequent, the ongoing adoption of chip card technology by merchants and FIs may help mitigate this risk. The Federal Reserve Payments Study found that counterfeit card fraud, as a percent of general-purpose card fraud, declined from 43.7% of card fraud value in 2015, to 36% in 2016.

Although *lost and stolen card usage in mail order/telephone order and point-of-sale channels* are ranked in the top three most frequent attacks by some respondents, comparatively the response suggests that lost and stolen card attacks are not as significant (see chart, page 30).



Credit Card Attacks

What are the three current fraud attacks most often used to initiate credit card fraud against your FI or your customers' accounts?



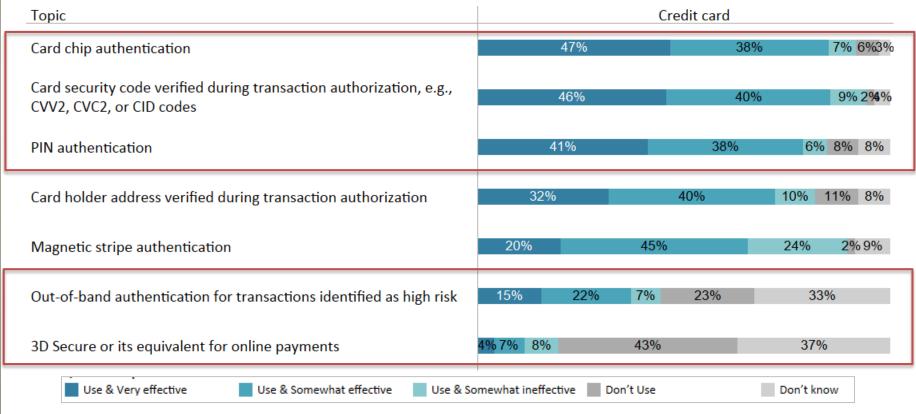
Credit Card Fraud Mitigation – Authentication



Five of the seven authentication methods listed are widely used and usage exceeds 80%. Three of these methods, security code verification, chip card authentication, and PIN authentication, are rated very effective by over 40% of respondents.

Similar to debit cards, 44% of FIs leverage *out-of-band authentication for transactions identified as high risk*, but only one-third of those using it rate it as very effective. Also, *3D secure or its equivalent* received relatively low effectiveness ratings.

Which of the following transaction authentication methods does your financial institution use to mitigate credit card fraud risks?

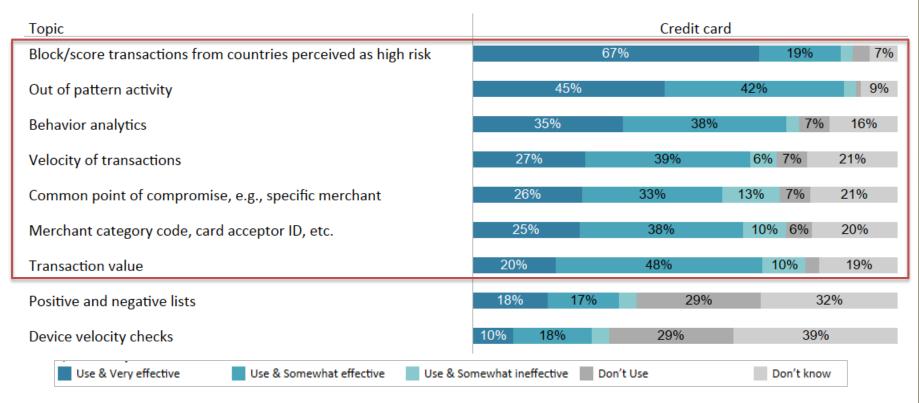


Credit Card Fraud Mitigation – Screening/Scoring



Seven of the nine types of data listed are used in fraud screening by 70% or more of the respondents. This is consistent with the debit card findings, and again seems to illustrate the need to incorporate many types of data to develop sophisticated fraud detection rules. *Blocking/scoring transactions from countries perceived as high risk* is the only data type in which two-thirds of respondents indicate high effectiveness. However, this approach may also negatively impact services to customers that travel to those countries.

Which of the following data does your financial institution incorporate into fraud screening tools to mitigate credit card fraud risks?

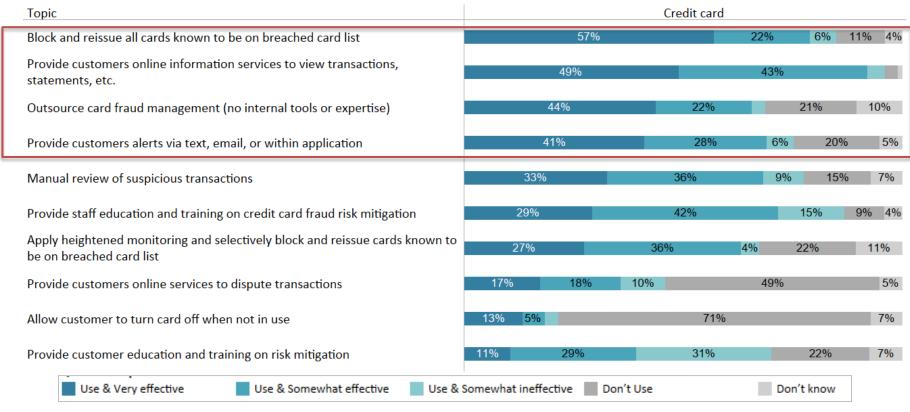


Credit Card Fraud Mitigation – Reporting and Other Risk Management Methods



About two-thirds of the respondents outsource card fraud management. Blocking all cards known to be on the breached card list is rated very effective by over half of the FIs. It's noteworthy that 92% of FIs offer customers online information services and 75% of FIs provide customer alerts; both are rated relatively high in terms of effectiveness indicating that FI customers are playing a role in fraud mitigation.

Which of the following reporting and other risk management methods does your financial institution use to mitigate credit card fraud risks?





Check Fraud Attacks and Mitigation

Check Fraud Attacks



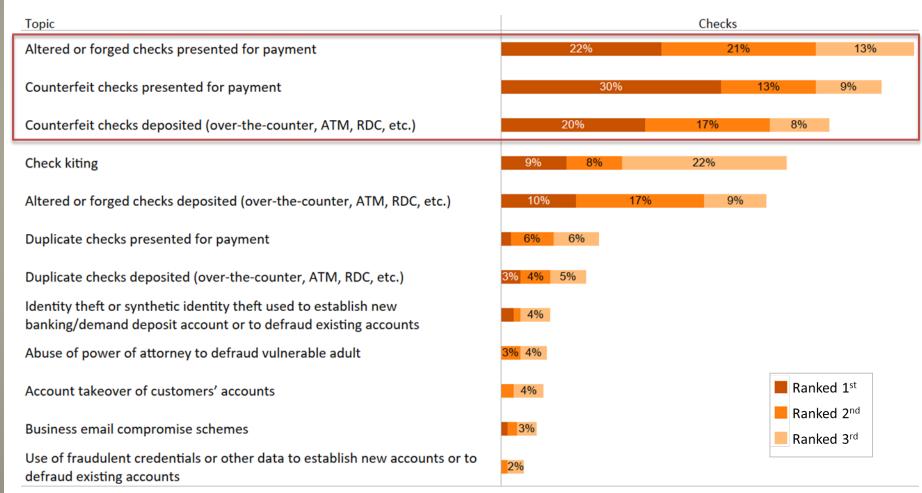
There is a greater variety of check fraud attack tactics compared to other payment types. Altered or forged checks presented for payment, counterfeit checks presented for payment, followed by counterfeit check deposited are identified as the most frequent check fraud attacks (see chart page 36).

As discussed earlier, although the number of checks written continue to decline, 66% of respondents state check fraud attempts are in the top three payment types having the highest number of fraud attempts. Twenty-eight percent of respondents report growth in check fraud losses in 2016 compared to 2015.



Check Fraud Attacks

What are the three current fraud attacks most often used to initiate check fraud against your financial institution or your customers' accounts?



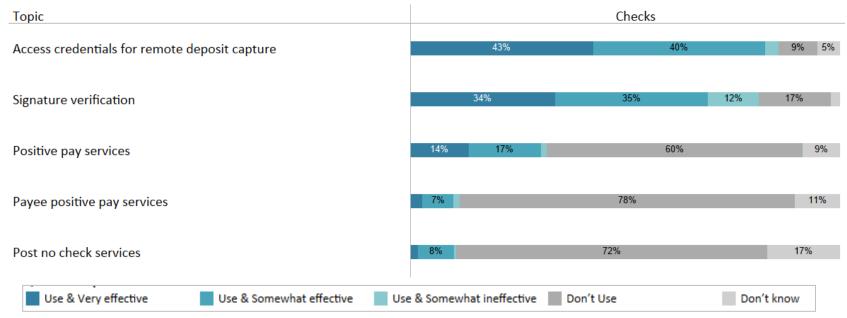
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Check Fraud Mitigation – Authentication

There are limited methods for authenticating check payments, which makes it a vulnerable payment method. Eighty-six percent of FIs that offer remote deposit capture (RDC) services use *access credentials* (a verifiable set of data presented by the customer as evidence of identity when accessing RDC services.) Eighty-one percent of FIs complete *signature verifications*.

Positive pay services are used by 31% of respondents. Although this is somewhat low, positive pay services are typically geared toward business clients. For FIs whose payment service clients are mostly businesses or a mix of business and consumers, rates of adoption are higher for positive pay (45%) and post no checks (17%).

Which of the following transaction authentication methods does your financial institution use to mitigate check fraud risks?



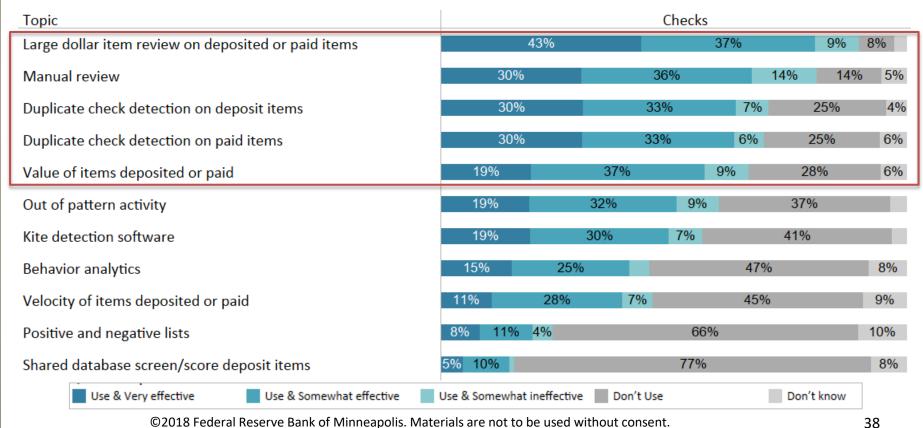
Only FIs that offer remote deposit capture services are asked about access credentials.

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Check Fraud Mitigation – Screening/Scoring

Two-thirds of FIs use five of the 11 check fraud screening and scoring methods listed. Of those, only 42% of FIs under \$50 million in assets use *duplicate check detection on deposit or paid items* compared to over 70% by FIs in other size categories. *Kite detection software* is used by 56% of respondents; however, only 16% of the FIs under \$50 million use this method.

Which of the following transaction fraud screening and scoring methods does your financial institution use to mitigate check fraud risks?

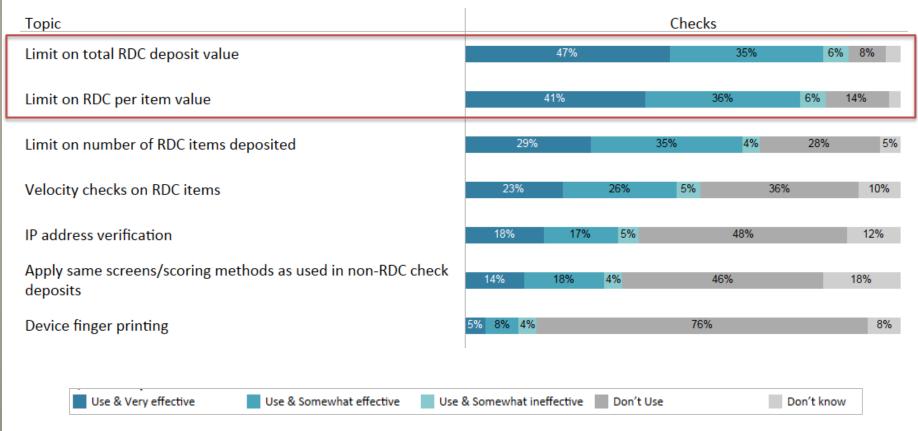


Check Fraud Mitigation – Remote Deposit Capture (RDC)



As for fraud screening and scoring methods applied to RDC deposits, restrictions on deposit value have the highest usage rates and nearly half of users rate it very effective.

Which of the following transaction fraud screening and scoring methods does your financial institution use to mitigate check RDC fraud risks?

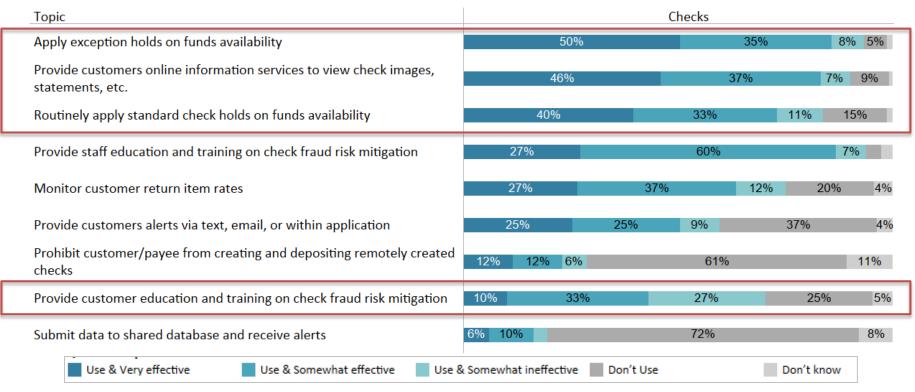


Check Fraud Mitigation – Reporting and Other Risk Management Methods



Half of the FIs said applying exception holds on funds availability is very effective, and 40% also reported the same for routinely applying standard check holds. Nine out of 10 FIs provide customers online information services, and rate it effective as a fraud mitigation method. Although customers are playing a role, many FIs that provide customer education on check fraud view it as somewhat ineffective.

Which of the following reporting and other risk management methods does your financial institution use to mitigate check fraud risks? For those used, please rate effectiveness.





ACH Fraud Attacks and Mitigation

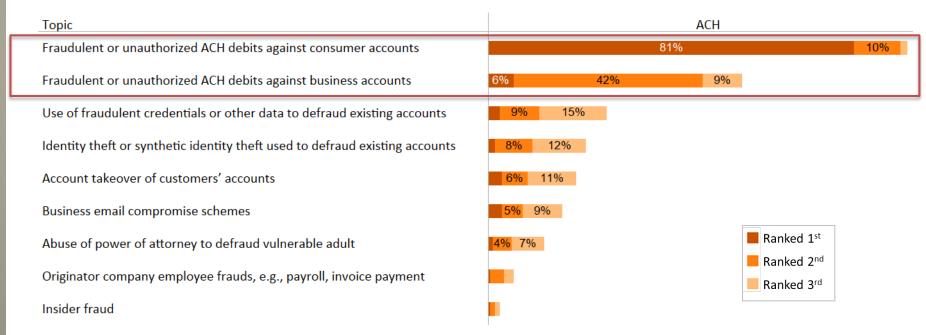
ACH Fraud Attacks



Eight out of 10 FIs that offer ACH services rank fraudulent or unauthorized debits against consumer accounts as the number one most frequent attack. Fraudulent or unauthorized debits against business accounts is ranked second. Although not all "unauthorized" ACH transactions are fraudulent, the responses are provided in the context of fraud attacks.

For FIs whose payment service clients are mostly businesses or a mix of business and consumers, the top two attacks do not change. However, for these FIs, nearly a third (31%) ranked *business email compromise* attacks in the top three attacks with 6% ranking it first, 7% ranking it second and 18% ranking it third.

What are the three current fraud attacks most often used to initiate ACH fraud against your financial institution or your customers' accounts?

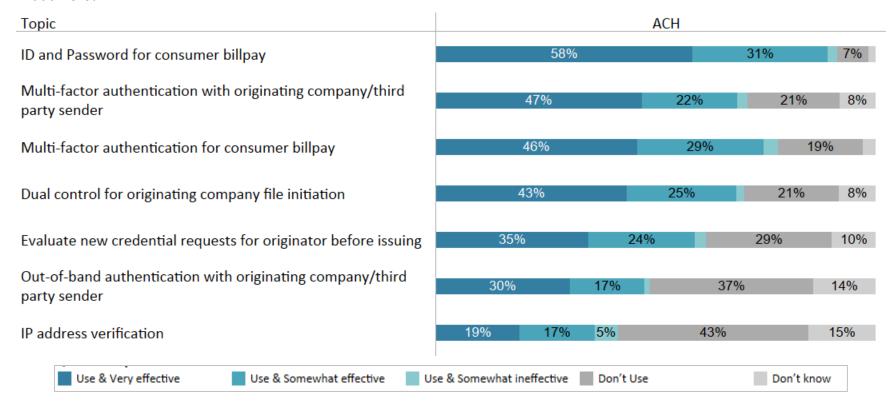


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ACH Fraud Mitigation – Authentication

FIs that offer billpay or ACH origination services are asked what methods they use for authentication. With one exception (IP address verification), all of the authentication methods are ranked very effective by over half (55% to 67%) of the FIs that use them. This seems to indicate relatively high satisfaction in these methods.

Which of the following ACH originator/sender authentication methods does your financial institution use to mitigate ACH fraud risks?

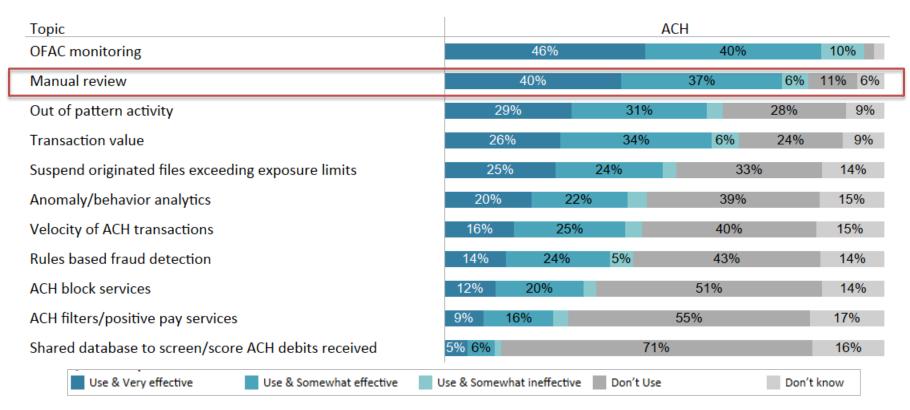


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ACH Fraud Mitigation – Screening/Scoring

Manual review processes are used by over 80% of FIs that offer ACH payment services. Nearly half the FIs using manual review process rate it as very effective. More than 90% of FIs over \$1 billion in size offer both ACH origination and receipt services tend to use more of the screening tools, which may help to identify relative effectiveness of these tools as shown on the next page.

Which of the following transaction fraud screening and scoring methods does your financial institution use to mitigate ACH fraud risks?

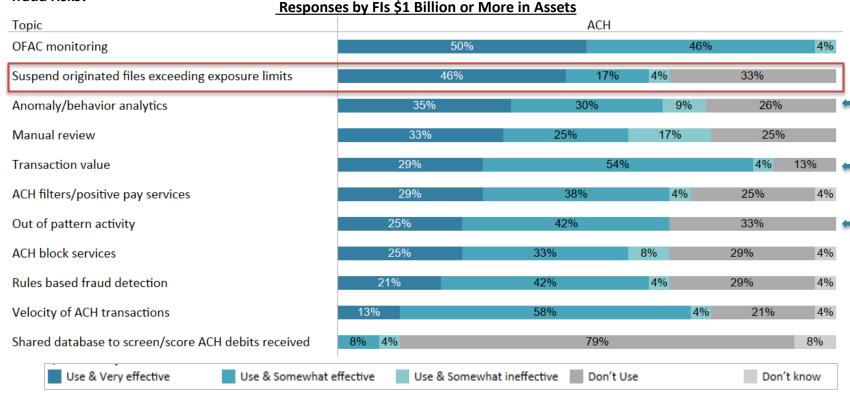


ACH Fraud Mitigation – Screening/Scoring by Respondents \$1 Billion and Over in Size



More than 90% of the large FIs offer both ACH origination and receipt services. Their use and effectiveness ratings of ACH screening/scoring tools differs from the "all" respondents average on the last page. This slice of the data provides another view of relative effectiveness. *Manual review* dropped in effectiveness relative to other more automated tools—anomaly/behavior analytics, transaction value, and out-of-pattern activity screening. For methods specific to ACH origination, suspending originated files exceeding exposure limits has the highest effectiveness rating with 68% of those using it rating it very effective.

Which of the following transaction fraud screening and scoring methods does your financial institution use to mitigate ACH fraud risks?

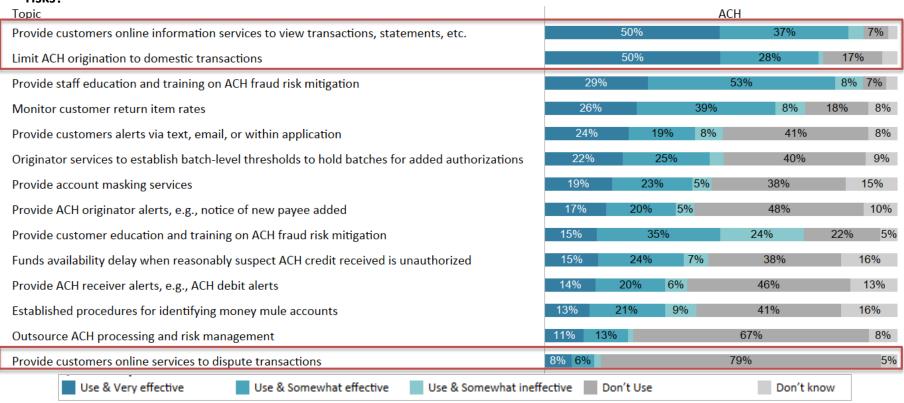


ACH Fraud Mitigation – Reporting and Other Risk Management Methods



There are three reporting and other risk management methods listed where 50% or more of the respondents that use the method rank it as very effective. Two of these methods (provide online information services allowing customers to view transactions and statements and provide customers online services to dispute transactions) rely on customer involvement in identifying fraudulent transactions. The third is *limit ACH origination to domestic transactions*.

Which of the following reporting and other risk management methods does your financial institution use to mitigate ACH fraud risks?





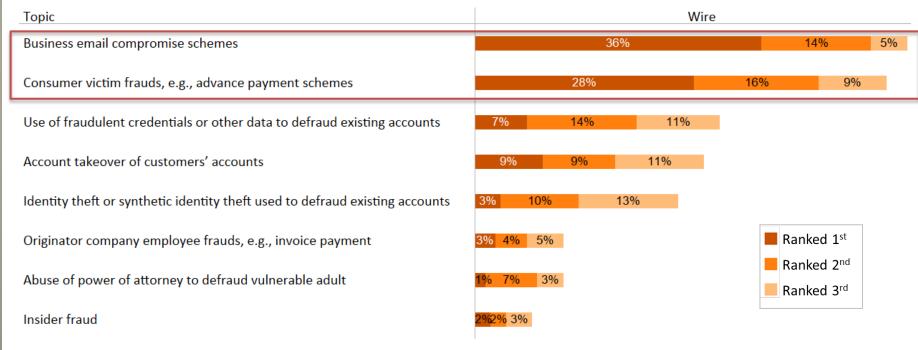
Wire Fraud Attacks and Mitigation

Wire Fraud Attacks



Business email compromise (BEC) attacks and consumer victim frauds are identified as the most frequent wire fraud attacks. For the largest FIs (over \$1 billion in assets) 74% ranked BEC attacks number one and 91% indicated it is in the top three. In contrast, for small FIs (under \$50 million), none of the respondents ranked BEC attacks first or second and only 5% ranked them third as the most frequent attack. Given that the small FIs are mostly credit union respondents, this is not surprising since their primary customer base is consumers. In slicing the data by FIs' predominant users of payment services, those that are consumer focused ranked consumer victim frauds highest with 38% of those respondents ranking it number one and a total of 54% ranking it in the top three.

What are the three current fraud attacks most often used to initiate wire fraud against your financial institution or your customers' accounts?

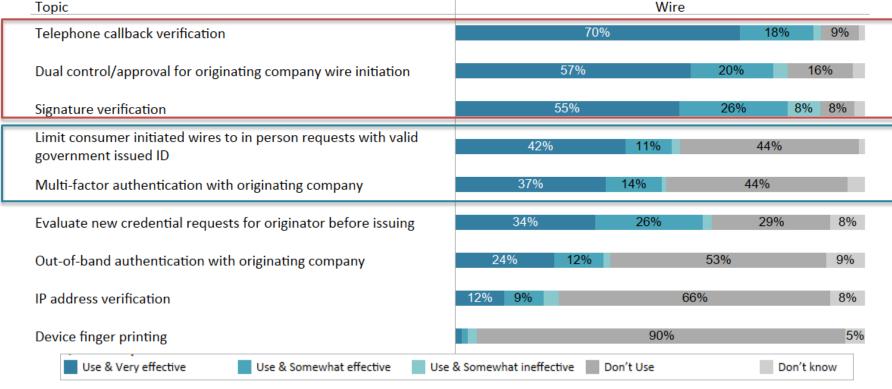


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Wire Fraud Mitigation – Authentication

Three of the authentication methods (telephone callback verification, dual control/approval by originating company, and signature verification) are used by over 80% of FIs, and over all, these are rated as very effective. Although adoption is somewhat lower on limiting consumer wires to in-person request with a valid government ID and multifactor authentication with originating company, these methods are rated high in terms of effectiveness. Given the top attacks—BEC and consumer victim frauds, these lesser used authentication methods (limit consumer initiated wires to in-person requests with valid ID and multi-factor authentication with originating company) might help curb these attacks.

Which of the following transaction authentication methods does your financial institution use to mitigate wire fraud risks?

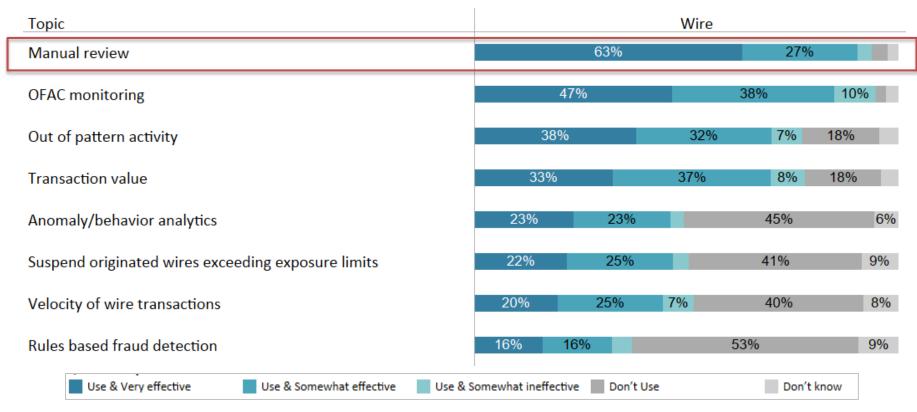


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Wire Fraud Mitigation – Screening/Scoring

Regardless of size, nine out of 10 FIs use *manual review* processes for wire. Although the effectiveness rating of *manual review* is rated very high overall, the rating varied by size of FI with 71% of the smallest FIs (those under \$50 million in assets) rating it very effective, compared to 48% of the largest FIs.

Which of the following transaction fraud screening and scoring methods does your financial institution use to mitigate wire fraud risks?



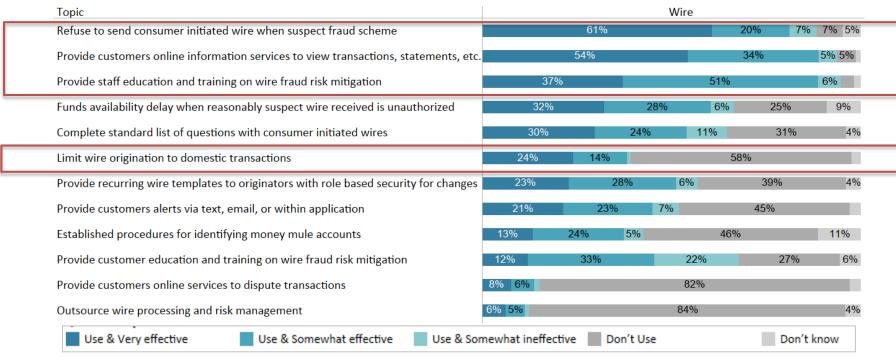
Wire Fraud Mitigation – Reporting and Other Risk Management Methods



Three of the reporting and other risk management methods listed are used by over 85% of respondents. Although *consumer* victim frauds are a concern, 7% of respondents that offer wire transfer services won't refuse to send a consumer-initiated wire when the FI suspects a fraud scheme.

Regardless of the FI size, over half of the respondents rank *customer online information services* as very effective. Fed researchers are surprised by this rating given the speed and finality of wire transfers. Once a wire is sent it is very difficult to recover funds. Similar to ACH, *limit wires to domestic transactions* has a high effectiveness rating by 60% of those that use it.

Which of the following reporting and other risk management methods does your financial institution use to mitigate wire fraud risks?





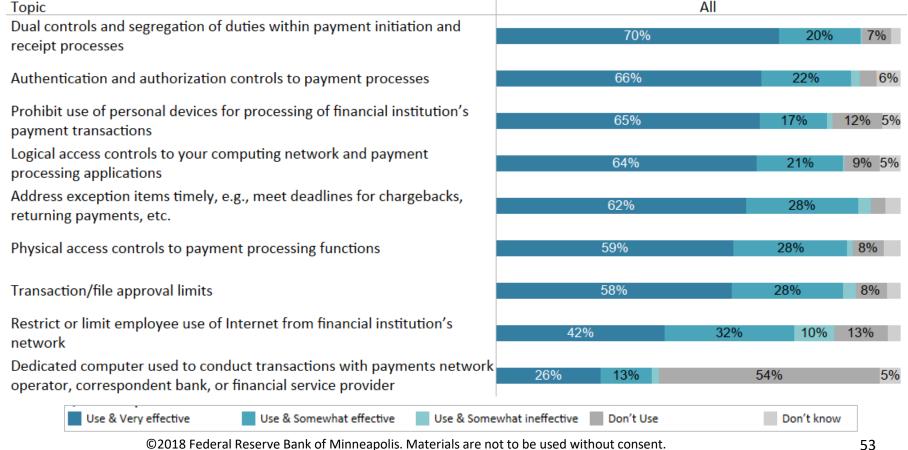
Fraud Mitigation Internal Controls

Internal Controls and Procedures



FIs are avid users of internal controls and procedures that can help reduce payments fraud risks. Eight of the nine internal controls and procedures listed are used by over 80% of the FIs responding to the survey, and nearly all of them are rated very effective by over half of the respondents.

Which of the following internal controls and procedures does your financial institution currently use to mitigate fraud risks?





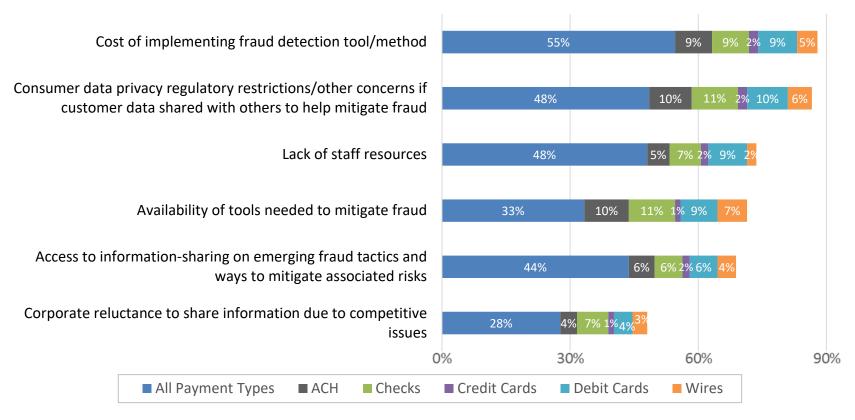
Barriers and Opportunities

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Barriers to Fraud Mitigation

Cost of implementing fraud detection tools/methods is considered the largest barrier. Lack of staff resources, access to information-sharing on emerging fraud tactics and ways to mitigate associated risk, and concerns about consumer data privacy are also seen as significant barriers across all payment types.

What are the main barriers to mitigate payments fraud that your financial institution experiences? (Choose all that apply)



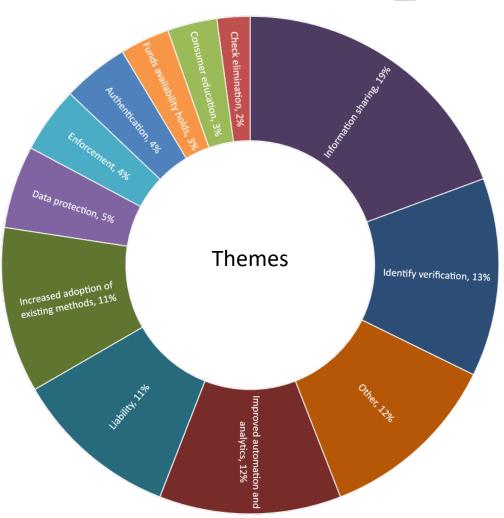
New or Improved Methods Needed



Respondents are asked an open-ended question on what new and improved methods are needed to help mitigate payments fraud. Ninety-three suggestions are offered. Eleven themes emerged as illustrated in the color wheel on the right.

Five themes stood out. Examples of ideas are listed below:

- 1. Information Sharing
 - Comprehensive database and alerting
 - Tracking system to determine source of fraud
 - Latest fraud schemes and how to mitigate
 - More sharing of information and cooperation among FIs
 - Ability to share information without breaking privacy rules
- 2. Identity Verification
 - Merchant participation in ID verification
 - KYC responsibility on those that accept payments
 - Online purchase identify verification
 - Name verification on ACH transactions to name on file on FI account



New or Improved Methods Needed Continued

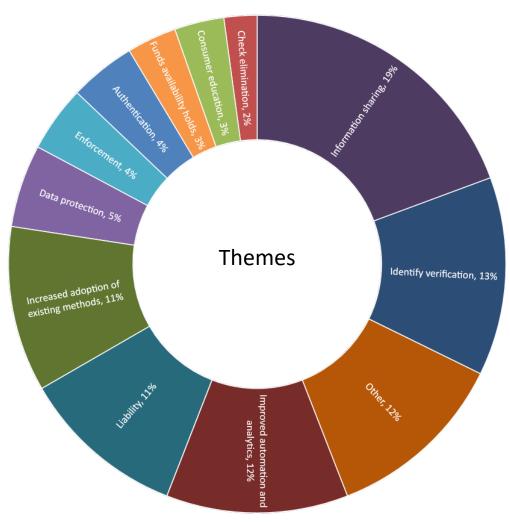


Themes and examples continued:

- 3. Improved automation and analytics
 - Better automation and advanced tool; less reliance on multiple "home grown" tools and labor intense processes
 - Machine learning, predictive tools
 - Improved core system analytics
 - Real-time tools

4. Liability

- Additional responsibility and accountability on merchant accepting card as payment
- Greater accountability on business/merchant for data breaches
- 5. Increased adoption of existing methods
 - Stricter endorsement requirements/mandates on RDC items
 - Greater adoption of EMV readers by merchants and automated fuel dispensers
 - Reduce use of mag stripe fallback by merchants when chip card can't be read at terminal
 - Require PIN on debit and credit card transactions





Data Tables

Note: Figures may not sum due to rounding.

Data Tables

Respondent Demographics	2
Payment Fraud Trends	3
Payments Fraud Mitigation	6
Account Application ProcessesDebit Card	7 9
Credit Card	14
Check	18
• ACH	23
Wire	28
 Internal Procedures and Controls 	33

What types of customers are the predominant users of your financial institution's payment products and services?

Respondent Size - Total Assets in Millions of Dollars

	Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+
Both somewhat even	25%	6%	26%	33%	57%
Primarily business/ commercial	5%	-	3%	11%	9%
Primarily consumers	70%	94%	71%	57%	35%

Which of the following payments products does your financial institution offer?

	Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+
Cash	95%	90%	98%	95%	96%
Checks	99%	96%	100%	100%	100%
Credit cards	43%	51%	38%	42%	42%
Debit cards	94%	83%	99%	99%	100%
Prepaid cards	42%	39%	43%	45%	38%
ACH origination	69%	39%	71%	89%	92%
ACH receipt	96%	93%	98%	96%	96%
Wire transfers	93%	79%	98%	100%	100%
International payments	32%	9%	28%	49%	71%
Bill payments	82%	51%	91%	98%	100%
Person to person (P2P) payments	45%	17%	44%	64%	79%
Consumer remote deposit capture	57%	21%	57%	80%	96%
Business remote deposit capture	44%	5%	41%	72%	92%

Respondent Size - Total Assets in Millions of Dollars

	Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+
Yes	82%	57%	88%	95%	100%
No	16%	38%	11%	4%	-
Don't know	2%	5%	1%	1%	-

Indicate the payment types where your financial institution experienced the highest number of fraud attempts in 2016. Consider all attempts regardless of actual financial losses. Select and rank the three that are highest.

Respondent Size - Total Assets in Millions of Dollars

		Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+
	1st Choice	14%	7%	9%	18%	29%
Checks	2nd Choice	21%	19%	19%	22%	33%
	3rd Choice	31%	26%	35%	36%	14%
	1st Choice	4%	7%	1%	3%	14%
Credit cards	2nd Choice	15%	33%	11%	11%	5%
	3rd Choice	11%	9%	12%	11%	10%
	1st Choice	11%	16%	8%	11%	10%
Debit cards - PIN based	2nd Choice	32%	19%	41%	30%	33%
	3rd Choice	19%	26%	11%	22%	24%
	1st Choice	68%	67%	76%	66%	48%
Debit cards - signature based	2nd Choice	18%	16%	15%	20%	24%
	3rd Choice	5%	-	3%	8%	10%
	1st Choice	-	-	-	-	-
ACH credits	2nd Choice	-	-	1%	-	-
	3rd Choice	2%	2%	4%	-	5%
	1st Choice	1%	2%	1%	-	-
ACH debits	2nd Choice	5%	5%	5%	5%	-
	3rd Choice	10%	9%	12%	4%	24%
	1st Choice	1%	-	1%	3%	-
Wires	2nd Choice	4%	2%	1%	8%	5%
	3rd Choice	7%	2%	5%	7%	19%

Did your financial institution experience any payment fraud losses in 2016?

Respondent Size - Total Assets in Millions of Dollars

	Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+
Yes	75%	46%	85%	83%	100%
No	22%	45%	13%	14%	-
Don't know	4%	9%	2%	2%	-

On which payment types did fraud losses occur?

		Overall	Less than \$50	\$50 - \$199 9	\$200 - \$999 9	\$1000+
	Losses	74%	48%	61%	89%	100%
Checks	No Losses	23%	48%	33%	11%	-
	Don't Know	3%	48%	6%	-	
Credit cards	Losses	77%	84%	74%	70%	90%
Credit Cards	No Losses	16%	11%	19%	19%	10%
	Don't Know	7%	5%	7%	11%	
	Losses	81%	78%	70%	91%	92%
Debit cards - PIN based	No Losses	14%	19%	24%	4%	8%
	Don't Know	5%	4%	6%	5%	
	Losses	96%	97%	96%	96%	96%
Debit cards - signature based	No Losses	2%	-	3%	3%	-
	Don't Know	2%	3%	1%	1%	4%
	Losses	8%	11%	2%	5%	25%
ACH credits	No Losses	86%	89%	94%	87%	60%
	Don't Know	6%	-	4%	8%	15%
	Losses	23%	23%	16%	15%	57%
ACH debits	No Losses	69%	73%	80%	75%	29%
	Don't Know	8%	5%	4%	10%	14%
	Losses	13%	-	10%	9%	36%
Wires	No Losses	84%	100%	86%	91%	55%
	Don't Know	3%	-	4%	-	9%
	Losses	7%	-	5%	5%	25%
Prepaid cards	No Losses	86%	100%	86%	95%	50%
	Don't Know	7%		9%		25%

		_						
		Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+		
	Increased	28%	28%	13%	30%	61%		
Checks	Stayed the Same	47%	60%	57%	40%	26%		
CHECKS	Decreased	20%	12%	20%	25%	13%		
	Don't Know	5%	-	10%	5%	-		
	Increased	41%	53%	29%	38%	60%		
Credit cards	Stayed the Same	32%	35%	29%	33%	30%		
Credit Cards	Decreased	16%	12%	21%	17%	10%		
	Don't Know	11%	-	21%	13%	-		
	Increased	50%	68%	35%	55%	61%		
Debit cards - PIN based	Stayed the Same	33%	32%	40%	28%	22%		
Debit cards - Fire based	Decreased	12%	-	15%	11%	17%		
	Don't Know	6%	-	10%	6%	-		
	Increased	63%	68%	58%	61%	77%		
Debit cards - signature based	Stayed the Same	19%	24%	18%	22%	5%		
Debit carus - signature baseu	Decreased	15%	9%	16%	15%	18%		
	Don't Know	4%	-	8%	1%	-		
	Increased	2%	6%	-	-	6%		
ACH credits	Stayed the Same	83%	88%	82%	85%	75%		
Acricients	Decreased	4%	-	2%	3%	13%		
	Don't Know	12%	6%	16%	12%	6%		
	Increased	8%	15%	6%	-	24%		
ACH debits	Stayed the Same	79%	80%	81%	88%	53%		
ACH debits	Decreased	4%	-	2%	3%	18%		
	Don't Know	8%	5%	10%	9%	6%		
	Increased	10%	-	5%	8%	30%		
Wires	Stayed the Same	77%	93%	77%	78%	65%		
viiles	Decreased	3%	7%	2%	3%	5%		
	Don't Know	10%	-	16%	11%	-		
	Increased	6%	-	-	5%	40%		
Prepaid cards	Stayed the Same	76%	100%	68%	79%	60%		
ricpaiu taius	Decreased	-	-	-	-	-		
	Don't Know	18%	-	32%	16%	-		

At your financial institution is fraud prevention/investigation a centralized function, is it decentralized by payment channel/silo, or is it some of each?

Respondent Size - Total Assets in Millions of Dollars

	Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+
Centralized	58%	69%	57%	54%	33%
Decentralized	12%	7%	15%	13%	17%
Mixed	30%	23%	28%	33%	50%

If mixed, which payment channels are managed separately?

	Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+
ACH	15%	19%	12%	9%	21%
Checks	19%	21%	23%	13%	21%
Credit card	16%	17%	12%	20%	10%
Debit card	34%	29%	40%	35%	28%
Prepaid card	4%	3%	4%	6%	3%
Wires	13%	10%	9%	17%	17%

		R	espondent Size	e - Total Assets	in Millions o	f Dollars
		OverallLess	s than \$50 \$5	0 - \$199.9 \$20	0 - \$999.9	\$1000+
	Use and Very Effective	65%	55%	67%	70%	75%
	Use and Somewhat effective	23%	23%	21%	26%	25%
Conduct KYC and CIP review	Use and somewhat ineffective	3%	3%	7%	1%	-
	Don't Use	5%	13%	4%	1%	-
	Don't Know	3%	7%	1%	1%	-
	Use and Very Effective	45%	30%	39%	62%	52%
Establish exposure limits for	Use and Somewhat effective	37%	29%	47%	34%	35%
customer use of payment	Use and somewhat ineffective	4%	6%	4%	-	9%
products	Don't Use	11%	23%	9%	3%	4%
	Don't Know	4%	12%	1%	1%	-
	Use and Very Effective	50%	45%	51%	50%	58%
Identity verification services to		26%	16%	25%	32%	38%
•	Use and somewhat ineffective	1%	1%	1%	1%	-
person or business	Don't Use	21%	32%	21%	17%	4%
	Don't Know	2%	6%	1%	-	-
	Use and Very Effective	39%	32%	41%	42%	38%
Agreements that specify	Use and Somewhat effective	30%	18%	33%	38%	25%
minimum security requirements	Use and somewhat ineffective	8%	5%	9%	7%	17%
for online banking pymt.	Don't Use	16%	32%	11%	10%	13%
origination	Don't Know	7%	14%	6%	3%	8%
	Use and Very Effective	58%	61%	65%	57%	25%
New customer limited to in	Use and Somewhat effective	16%	14%	12%	21%	21%
person submission of new	Use and somewhat ineffective	-	-	-	-	21/0
account application	Don't Use	24%	23%	19%	20%	54%
	Don't Know	3%	3%	4%	3%	3470
	Use and Very Effective	33%	38%	28%	39%	13%
	Use and Somewhat effective	27%	26%	30%	21%	35%
Credit report inquiry	Use and somewhat ineffective	2%	3%	1%	3%	33/0
create report inquiry	Don't Use	38%	32%	40%	38%	48%
	Don't Gse Don't Know	1%	1%	1%	30/0	48%
	Use and Very Effective	23%	14%	23%	31%	29%
Fatablish mustima	Use and Somewhat effective	13%	9%	16%	14%	29% 8%
Establish prefunding	Use and somewhat ineffective	3%	2%	1%	3%	8%
of payment products	Don't Use	51%	63%	48%	3 <i>%</i> 47%	46%
or payment products	Don't Know	10%	13%	13%	47% 6%	40% 8%
	Use and Very Effective	15%	13%	15%	17%	13%
	Use and Somewhat effective	14%	13%	15% 17%		
Financial or tax return review	Use and somewhat ineffective				14%	9%
Financial of tax return review		3%	4%	1%	3%	4%
	Don't Use	64%	63%	66%	62%	65%
	Don't Know	4%	6%	1%	4%	9%
Harada a de la contraction de	Use and Very Effective	12%	12%	10%	14%	17%
Use of positive and negative	Use and Somewhat effective	13%	13%	13%	10%	22%
lists, e.g., NACHA originator	Use and somewhat ineffective	4%	3%	3%	8%	
watch list	Don't Use	61%	54%	69%	60%	61%
	Don't Know	9%	18%	5%	8%	-
	Use and Very Effective	5%	6%	8%	-	4%
Require a reserve of funds for	Use and Somewhat effective	9%	9%	10%	7%	8%
return items and other claims	Use and somewhat ineffective	1%	-	1%	1%	-
	Don't Use	76%	69%	74%	84%	75%
	Don't Know	10%	15%	8%	8%	13%

		Overall	Less than \$50	\$50 - \$199.9\$	200 - \$999.9	\$1000+
	Use and Very Effective	68%	78%	52%	76%	44%
Credit report inquiry during	Use and Somewhat effective	23%	15%	34%	21%	33%
credit card account application	Use and somewhat ineffective	4%	5%	7%	-	11%
process	Don't Use	2%	2%	3%	-	-
	Don't Know	3%	-	3%	3%	11%
	Use and Very Effective	58%	49%	50%	78%	56%
	Use and Somewhat effective	23%	28%	29%	13%	22%
Credit underwriting review	Use and somewhat ineffective	6%	8%	11%	3%	-
	Don't Use	6%	10%	4%	3%	11%
	Don't Know	6%	5%	7%	3%	11%
	Use and Very Effective	60%	63%	55%	68%	33%
Identity verification services to help confirm the identity of the	Use and Somewhat effective	17%	8%	24%	15%	44%
person or business during the	Use and somewhat ineffective	4%	3%	3%	6%	-
account application process	Don't Use	17%	25%	14%	12%	11%
	Don't Know	3%	3%	3%	-	11%
	Use and Very Effective	30%	36%	25%	31%	11%
	Use and Somewhat effective	21%	21%	18%	25%	22%
Financial or tax return review	Use and somewhat ineffective	5%	8%	4%	3%	-
	Don't Use	34%	33%	46%	22%	44%
	Don't Know	10%	3%	7%	19%	22%
	Use and Very Effective	17%	22%	7%	23%	-
Colletoval pladas against	Use and Somewhat effective	14%	11%	11%	20%	11%
Collateral pledge against activity on credit card account	Use and somewhat ineffective	6%	5%	4%	3%	22%
.,	Don't Use	56%	57%	70%	43%	56%
	Don't Know	8%	5%	7%	10%	11%

What are the three current fraud attacks most often used to initiate debit card fraud against your financial institution or your customer's accounts?

		Respondent Size - Total Assets in Millions of Dol				
			Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+
	1st Choice	57%	51%	53%	64%	70%
Counterfeit debit cards used at point-of-sale	2nd Choice	20%	15%	24%	19%	22%
	3rd Choice	7%	9%	8%	6%	-
Counterfeit or stolen cards or card data used	1st Choice	34%	40%	40%	25%	26%
online (card-not-present)	2nd Choice	34%	18%	30%	47%	39%
	3rd Choice	14%	16%	14%	14%	13%
	1st Choice	3%	4%	3%	3%	-
Debit card used by family member or friend	2nd Choice	4%	4%	6%	4%	-
	3rd Choice	25%	25%	26%	26%	17%
	1st Choice	4%	2%	5%	5%	4%
Lost or stolen debit cards used at point-of-sale	2nd Choice	11%	20%	10%	8%	9%
	3rd Choice	14%	15%	14%	14%	13%
Counterfeit or stolen cards or card data used in	1st Choice	2%	2%	4%	-	-
telephone or mail order (card-not-present)	2nd Choice	14%	27%	14%	8%	9%
telephone of mail order (card-not-present)	3rd Choice	13%	11%	19%	9%	9%
Counterfeit debit cards used at ATM, e.g., for ca	1st Choice	1%	2%	1%	1%	-
withdrawal	2nd Choice	13%	16%	13%	9%	17%
withurawai	3rd Choice	14%	7%	10%	19%	26%
Account takeover of customers' accounts, e.g.,	1st Choice	-	-	-	1%	-
changes cardholders address/contact data,	2nd Choice	1%	-	1%	1%	-
takeover of merchant account with card-on-file,						
etc.	3rd Choice	3%	2%	-	4%	17%
Identity theft or synthetic identity theft used to	1st Choice	-	-	-	-	-
establish new debit card account/demand deposit	2nd Choice	3%	-	1%	1%	-
accounts or defraud existing accounts	3rd Choice	1%	5%	1%	4%	-
	1st Choice	-	-	1%	-	-
Lost or stolen debit cards used at ATM	2nd Choice	1%	-	-	1%	4%
	3rd Choice	3%	4%	3%	1%	4%
Fraudulent credentials or other data used to	1st Choice	-	-	-	-	-
establish new debit card accounts or to defraud	2nd Choice	1%	-	1%	1%	-
existing accounts	3rd Choice	1%	2%	1%	-	-

		Respondent Size - Total Assets in Millions of					
		OverallLess	than \$50	\$50 - \$199.9 \$20	0 - \$999.9	\$1000+	
	Use and Very Effective	53%	54%	51%	55%	54%	
	Use and Somewhat effective	38%	37%	40%	39%	33%	
PIN authentication	Use and somewhat ineffective	5%	4%	6%	4%	8%	
	Don't Use	1%	-	1%	1%	-	
	Don't Know	3%	6%	2%	0%	4%	
	Use and Very Effective	22%	32%	21%	21%	9%	
	Use and Somewhat effective	50%	51%	50%	53%	35%	
Magnetic stripe authentication	Use and somewhat ineffective	20%	9%	19%	21%	48%	
	Don't Use	4%	-	6%	4%	4%	
	Don't Know	4%	8%	4%	1%	4%	
	Use and Very Effective	39%	56%	30%	42%	22%	
Country and a south of	Use and Somewhat effective	47%	37%	52%	46%	57%	
Card security code verified	Use and somewhat ineffective	4%	2%	4%	4%	13%	
during transaction authorization	Don't Use	5%	2%	8%	5%	4%	
	Don't Know	4%	4%	6%	3%	4%	
	Use and Very Effective	43%	30%	46%	48%	43%	
	Use and Somewhat effective	37%	41%	32%	39%	39%	
Card chip authentication	Use and somewhat ineffective	2%	-	2%	1%	4%	
	Don't Use	16%	26%	16%	10%	9%	
	Don't Know	3%	4%	4%	1%	4%	
	Use and Very Effective	23%	39%	15%	21%	17%	
Cand halden address	Use and Somewhat effective	36%	31%	33%	43%	35%	
Card holder address verified	Use and somewhat ineffective	11%	8%	14%	9%	13%	
during transaction authorization	Don't Use	21%	12%	24%	20%	30%	
	Don't Know	9%	10%	13%	7%	4%	
	Use and Very Effective	18%	12%	20%	24%	13%	
Out-of-band authentication for	Use and Somewhat effective	22%	25%	23%	18%	29%	
transactions identifed as high	Use and somewhat ineffective	3%	6%	4%	1%	-	
risk	Don't Use	32%	27%	29%	33%	46%	
	Don't Know	24%	31%	24%	24%	13%	
	Use and Very Effective	3%	4%	3%	3%		
2D Common its assistance for	Use and Somewhat effective	11%	10%	7%	19%	9%	
3D Secure or its equivalent for	Use and somewhat ineffective	4%	-	-	6%	22%	
online payments	Don't Use	56%	50%	64%	54%	48%	
	Don't Know	26%	37%	26%	19%	22%	

			Respondent Size	e - Total Assets	in Millions o	f Dollars
		OverallLes	s than \$50 \$5	0 - \$199.9 \$20	0 - \$999.9	\$1000+
	Use and Very Effective	43%	50%	39%	45%	38%
	Use and Somewhat effective	44%	33%	48%	48%	50%
Out of pattern activity	Use and somewhat ineffective	7%	13%	6%	3%	4%
	Don't Use	2%	-	3%	4%	-
	Don't Know	4%	4%	5%	-	8%
	Use and Very Effective	64%	62%	60%	74%	54%
Diagle/sease transactions from	Use and Somewhat effective	26%	19%	31%	22%	38%
Block/score transactions from countries perceived as high risk	Use and somewhat ineffective	1%	4%	-	1%	-
countries perceived as high risk	Don't Use	4%	8%	5%	1%	4%
	Don't Know	4%	8%	4%	1%	4%
	Use and Very Effective	27%	30%	27%	27%	17%
	Use and Somewhat effective	45%	36%	44%	48%	63%
Transaction value	Use and somewhat ineffective	9%	9%	10%	7%	13%
	Don't Use	9%	8%	9%	14%	-
	Don't Know	9%	17%	9%	4%	8%
	Use and Very Effective	25%	30%	18%	28%	25%
	Use and Somewhat effective	42%	30%	39%	52%	50%
Common point of compromise	Use and somewhat ineffective	11%	14%	14%	3%	17%
•	Don't Use	9%	10%	15%	6%	-
	Don't Know	13%	16%	15%	11%	8%
	Use and Very Effective	24%	22%	22%	31%	13%
	Use and Somewhat effective	45%	36%	42%	51%	61%
Merchant category code, card	Use and somewhat ineffective	8%	14%	10%	1%	9%
acceptor ID, etc.	Don't Use	10%	12%	13%	4%	13%
	Don't Know	13%	16%	13%	13%	4%
	Use and Very Effective	30%	28%	29%	30%	33%
	Use and Somewhat effective	40%	26%	36%	49%	54%
Behavior analytics	Use and somewhat ineffective	5%	8%	6%	1%	4%
	Don't Use	12%	18%	13%	10%	-
	Don't Know	14%	20%	17%	9%	8%
	Use and Very Effective	24%	25%	22%	31%	4%
	Use and Somewhat effective	42%	29%	36%	46%	75%
Velocity of transactions	Use and somewhat ineffective	8%	10%	9%	4%	8%
	Don't Use	14%	16%	19%	10%	8%
	Don't Know	12%	20%	14%	9%	4%
	Use and Very Effective	12%	21%	9%	9%	13%
Positive and negative lists	Use and Somewhat effective	19%	15%	20%	19%	25%
	Use and somewhat ineffective	5%	6%	5%	6%	-
	Don't Use	33%	27%	31%	34%	46%
	Don't Know	31%	31%	34%	31%	17%
	Use and Very Effective	12%	14%	10%	13%	13%
	Use and Somewhat effective	21%	20%	15%	25%	25%
Device velocity checks	Use and somewhat ineffective	2%	6%	-	-	4%
	Don't Use	33%	18%	38%	40%	25%
	Don't Know	33%	41%	37%	22%	33%

		Respondent Size - Total Assets in Millions of D				
		OverallLe	ess than \$50	\$50 - \$199.9 \$20	00 - \$999.9	\$1000+
	Use and Very Effective	52%	58%	51%	55%	38%
Provide customers online	Use and Somewhat effective	43%	35%	48%	38%	58%
information services to view	Use and somewhat ineffective	2%	-	-	5%	-
transactions, statements, etc.	Don't Use	3%	8%	1%	-	-
	Don't Know	_	-	-	1%	4%
	Use and Very Effective	24%	29%	24%	21%	17%
Provide staff education and	Use and Somewhat effective	59%	54%	58%	66%	58%
training on debit card fraud risk	Use and somewhat ineffective	13%	10%	15%	13%	17%
mitigation	Don't Use	2%	6%	1%	_	4%
_	Don't Know	1%	2%	1%	_	4%
	Use and Very Effective	59%	72%	61%	51%	46%
Block and reissue all cards	Use and Somewhat effective	26%	13%	25%	30%	42%
known to be on breached card	Use and somewhat ineffective	3%	6%	3%	4%	-
list	Don't Use	11%	8%	10%	15%	8%
	Don't Know	1%	2%	1%	-	4%
	Use and Very Effective	11%	16%	12%	9%	8%
	Use and Somewhat effective	41%	39%	40%	45%	38%
Provide customer education and	l Ise and somewhat ineffective	30%	27%	34%	30%	25%
training on fraud risk mitigation	Don't Use	13%	18%	9%	12%	17%
	Don't Know	5%	-	5%	4%	13%
	Use and Very Effective	31%	33%	31%	32%	21%
	Use and Somewhat effective	36%	37%	40%	32%	38%
Manual review of suspicious transactions	Use and somewhat ineffective	14%	12%	12%	18%	13%
	Don't Use	15%	16%	13%	17%	17%
	Don't Know	4%	2%	4%	1%	13%
	Use and Very Effective	35%	31%	34%	39%	33%
Provide customers alerts via	Use and Somewhat effective	30%	14%	34%	36%	33%
text, email, or within	Use and somewhat ineffective	9%	10%	9%	10%	4%
application	Don't Use	23%	37%	22%	15%	25%
	Don't Know	3%	8%	1%	-	4%
	Use and Very Effective	34%	43%	30%	32%	29%
Apply heightened monitoring	Use and Somewhat effective	31%	22%	32%	38%	29%
and selectively block and reissue	Use and somewhat ineffective	5%	4%	5%	7%	-
cards known to be on breached	Don't Use	27%	27%	29%	23%	33%
card list	Don't Know	3%	4%	4%		8%
-	Use and Very Effective	32%	42%	26%	37%	11%
	Use and Somewhat effective	30%	25%	23%	33%	56%
Limit load value on prepaid	Use and somewhat ineffective	7%	4%	10%	4%	11%
cards	Don't Use	22%	17%	29%	22%	11%
	Don't Know	10%	13%	13%	4%	11%
	Use and Very Effective	37%	43%	32%	38%	26%
Outsource debit card fraud	Use and Somewhat effective	24%	20%	31%	24%	14%
management (no internal tools or expertise)		4%	6%	4%	1%	5%
	Don't Use	29%	20%	30%	32%	41%
	Don't Know	6%	12%	3%	4%	5%
	Use and Very Effective	16%	10%	18%	21%	8%
	Use and Somewhat effective	15%	6%	16%	20%	21%
Allow customer to turn card off	Use and somewhat ineffective	6%	2%	4%	7%	17%
when not in use	Don't Use	60%	75%	61%	52%	46%
	Don't Know	3%	8%	1%	J2/0 _	8%
	DOIL F KITOW	370	0%	170		070

Continued - Which of the following reporting and other risk management methods does your financial institution use to mitigate debit card fraud risk?

		Respondent Size - Total Assets in Millions of Dollars					
		OverallLess	than \$50	\$50 - \$199.9 \$2	00 - \$999.9	\$1000+	
	Use and Very Effective	18%	17%	16%	27%	0%	
Out.:	Use and Somewhat effective	11%	9%	13%	12%	11%	
Only issue non-reloadable prepaid cards	Use and somewhat ineffective	2%	4%	-	4%	-	
	Don't Use	60%	65%	59%	54%	67%	
	Don't Know	9%	4%	13%	4%	22%	
	Use and Very Effective	7%	10%	4%	8%	8%	
Provide customers online services to dispute transactions	Use and Somewhat effective	11%	12%	8%	11%	17%	
	Use and somewhat ineffective	5%	2%	4%	7%	4%	
	Don't Use	75%	71%	83%	74%	67%	
	Don't Know	2%	6%	1%	-	4%	

		Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+
	1st Choice	38%	34%	38%	40%	44%
Counterfeit or stolen cards or card data used online (card-not-present)	2nd Choice	39%	40%	46%	33%	33%
	3rd Choice	12%	14%	4%	17%	11%
	1st Choice	53%	42%	62%	57%	56%
Counterfeit credit cards used at point-of- sale	2nd Choice	20%	14%	19%	23%	33%
Juic	3rd Choice	6%	6%	12%	3%	-
Counterfeit or stolen cards or card data	1st Choice	3%	9%	-	-	_
used by telephone or mail order (card-	2nd Choice	12%	17%	12%	10%	-
not-present)	3rd Choice	20%	23%	31%	13%	-
	1st Choice	2%	3%	-	3%	
Lost or stolen credit cards used at point- of-sale	2nd Choice	13%	14%	15%	13%	-
oi-sale	3rd Choice	19%	20%	15%	27%	-
	1st Choice	_	-	-	-	_
Credit card used by family member or friend	2nd Choice	4%	3%	4%	3%	11%
menu	3rd Choice	19%	23%	23%	10%	22%
	1st Choice	2%	6%	-	-	_
Counterfeit credit cards used at ATM, e.g., for cash advance	2nd Choice	6%	9%	4%	7%	-
cigi, for cash advance	3rd Choice	5%	9%	-	3%	11%
Account takeover of customers'	1st Choice	-	-	-	-	-
accounts, e.g., changes cardholders address/contact data, takeover of	2nd Choice	1%	-	-	3%	-
merchant account with card-on-file, etc.	3rd Choice	5%	-	4%	3%	33%
Fraudulent credentials or other data	1st Choice	-	-	-	-	_
used to establish new credit card	2nd Choice	3%	3%	-	-	22%
accounts or to defraud existing accounts	3rd Choice	1%	1%	-	-	11%
	1st Choice	-	3%	-	-	_
Lost or stolen credit cards used at ATM	2nd Choice	1%	-	-	-	-
	3rd Choice	2%		4%	3%	
Identity theft or synthetic identity theft	1st Choice	_	-	-	-	-
used to establish new credit card	2nd Choice	-	-	-	-	-
accounts or to defraud existing accounts	3rd Choice	3%	-	4%	7%	-

Respondent Size - Total Assets in Millions of Dollars

		Overall	Less than \$50	\$50 - \$199.9 \$20	00 - \$999.9	\$1000+
	Use and Very Effective	46%	53%	42%	41%	44%
Conditional and the design of	Use and Somewhat effective	40%	36%	35%	53%	22%
Card security code verified during transaction authorization	Use and somewhat ineffective	9%	8%	15%	-	22%
	Don't Use	2%	-	8%	-	-
	Don't Know	4%	3%	-	6%	11%
	Use and Very Effective	47%	45%	54%	50%	22%
	Use and Somewhat effective	38%	34%	42%	41%	33%
Card chip authentication	Use and somewhat ineffective	7%	11%	4%	-	22%
	Don't Use	6%	8%	-	6%	11%
	Don't Know	3%	3%	-	3%	11%
	Use and Very Effective	20%	30%	15%	16%	11%
	Use and Somewhat effective	45%	41%	46%	53%	33%
Magnetic stripe authentication	Use and somewhat ineffective	24%	22%	31%	16%	44%
	Don't Use	2%	-	-	6%	-
	Don't Know	9%	8%	8%	9%	11%
	Use and Very Effective	41%	50%	38%	42%	11%
	Use and Somewhat effective	38%	42%	42%	30%	33%
PIN authentication	Use and somewhat ineffective	6%	6%	4%	3%	22%
	Don't Use	8%	3%	8%	12%	11%
	Don't Know	8%	-	8%	12%	22%
	Use and Very Effective	32%	39%	31%	21%	44%
Card holder address verified	Use and Somewhat effective	40%	39%	42%	48%	11%
during transaction authorization	Use and somewhat ineffective	10%	8%	8%	12%	11%
3	Don't Use	11%	8%	12%	9%	22%
	Don't Know	8%	6%	8%	9%	11%
	Use and Very Effective	15%	12%	8%	28%	11%
Out-of-band authentication for	Use and Somewhat effective	22%	18%	16%	28%	33%
transactions identified as high	Use and somewhat ineffective	7%	12%	8%	3%	-
risk	Don't Use	23%	21%	32%	17%	22%
	Don't Know	33%	38%	36%	24%	33%
	Use and Very Effective	4%	6%	-	4%	11%
3D Secure or its equivalent for	Use and Somewhat effective	7%	9%	8%	7%	-
online payments	Use and somewhat ineffective	8%	11%	4%	4%	22%
	Don't Use	43%	37%	50%	41%	56%
	Don't Know	37%	37%	38%	44%	11%

Which of the following data does your financial institution incorporate into fraud screening tools to mitigate credit card fraud risks?

		R	espondent	Size - Total Assets	s in Millions d	f Dollars
		OverallLess	than \$50	\$50 - \$199.9 \$20	0 - \$999.9	\$1000+
	Use and Very Effective	45%	50%	38%	48%	33%
	Use and Somewhat effective	42%	36%	50%	39%	56%
Out of pattern activity	Use and somewhat ineffective	3%	-	4%	6%	-
•	Don't Use	1%	-	4%	-	-
	Don't Know	9%	14%	4%	6%	11%
	Use and Very Effective	67%	56%	65%	82%	67%
District and the second second	Use and Somewhat effective	19%	22%	27%	9%	22%
Block/score transactions from	Use and somewhat ineffective	3%	6%	-	3%	-
countries perceived as high risk	Don't Use	4%	8%	4%	-	-
	Don't Know	7%	8%	4%	6%	11%
	Use and Very Effective	20%	23%	12%	26%	11%
	Use and Somewhat effective	48%	34%	58%	52%	67%
Transaction value	Use and somewhat ineffective	10%	11%	12%	7%	11%
	Don't Use	3%	6%	4%	_	-
	Don't Know	19%	26%	15%	15%	11%
	Use and Very Effective	35%	34%	35%	34%	44%
Behavior analytics	Use and Somewhat effective	38%	29%	46%	41%	44%
	Use and somewhat ineffective	3%	3%	4%	3%	-
	Don't Use	7%	14%	4%	3%	-
	Don't Know	16%	20%	12%	17%	11%
	Use and Very Effective	25%	23%	19%	38%	11%
	Use and Somewhat effective	38%	29%	38%	41%	67%
Merchant category code, card	Use and somewhat ineffective	10%	9%	15%	7%	11%
acceptor ID, etc.	Don't Use	6%	9%	12%	_	/-
	Don't Know	20%	31%	15%	14%	11%
	Use and Very Effective	26%	27%	15%	34%	22%
	Use and Somewhat effective	33%	24%	35%	34%	56%
Common point of compromise	Use and somewhat ineffective	13%	12%	19%	10%	11%
	Don't Use	7%	12%	12%	-	/-
	Don't Know	21%	24%	19%	21%	11%
	Use and Very Effective	27%	26%	23%	28%	33%
	Use and Somewhat effective	39%	29%	38%	48%	44%
Velocity of transactions	Use and somewhat ineffective	6%	9%	-	10%	
	Don't Use	7%	9%	12%	3%	_
	Don't Know	21%	26%	27%	10%	22%
	Use and Very Effective	18%	18%	16%	17%	22%
	Use and Somewhat effective	17%	15%	24%	14%	11%
Positive and negative lists	Use and somewhat ineffective	4%	6%	4%	3%	
	Don't Use	29%	30%	20%	31%	44%
	Don't Know	32%	30%	36%	34%	22%
	Use and Very Effective	10%	6%	8%	12%	22%
	Use and Somewhat effective	18%	21%	20%	15%	11%
Device velocity checks	Use and somewhat ineffective	4%	3%	8%	4%	
Detrice velocity effects	Don't Use	29%	27%	24%	35%	33%
	DOI: LOJE	23/0	Z1/0	Z+/0	33/0	JJ/0

	11383:						
		_	Respondent	Size -	Total Assets	in Millions o	f Dollars
		OverallL	ess than \$50	\$50 -	\$199.9 \$20	0 - \$999.9	\$1000+
	Use and Very Effective	49%	53%		40%	53%	44%
Provide customers online	Use and Somewhat effective	43%	38%		52%	44%	33%
information services to view	Use and somewhat ineffective	4%	6%		-	3%	11%
transactions, statements, etc.	Don't Use	3%	3%		8%	-	-
	Don't Know	1%	-		-	-	11%
	Use and Very Effective	29%	27%		24%	38%	22%
Provide staff education and	Use and Somewhat effective	42%	48%		48%	34%	33%
training on credit card fraud risk	Use and somewhat ineffective	15%	9%		20%	19%	11%
mitigation	Don't Use	9%	15%		-	6%	22%
	Don't Know	4%	-		8%	3%	11%
	Use and Very Effective	57%	64%		56%	55%	44%
Block and reissue all cards	Use and Somewhat effective	22%	18%		28%	21%	22%
known to be on breached card	Use and somewhat ineffective	6%	6%		8%	6%	-
list	Don't Use	11%	6%		8%	18%	11%
	Don't Know	4%	6%		-	-	22%
	Use and Very Effective	33%	36%		32%	32%	22%
Bannal mariant of attentions	Use and Somewhat effective	36%	33%		44%	32%	33%
Manual review of suspicious transactions	Use and somewhat ineffective	9%	3%		8%	10%	33%
transactions	Don't Use	15%	24%		8%	16%	-
	Don't Know	7%	3%		8%	10%	11%
	Use and Very Effective	41%	44%		28%	48%	44%
Provide customers alerts via	Use and Somewhat effective	28%	13%		44%	29%	33%
text, email, or within	Use and somewhat ineffective	6%	3%		8%	6%	11%
application	Don't Use	20%	41%		12%	10%	-
	Don't Know	5%	-		8%	6%	11%
	Use and Very Effective	11%	16%		8%	11%	_
	Use and Somewhat effective	29%	28%		32%	29%	22%
Provide customer education and	Use and somewhat ineffective	31%	31%		40%	18%	44%
training on risk mitigation	Don't Use	22%	25%		8%	32%	22%
	Don't Know	7%	-		12%	11%	11%
	Use and Very Effective	44%	42%		40%	48%	44%
Outsource card fraud	Use and Somewhat effective	22%	18%		36%	10%	33%
management (no internal tools	Use and somewhat ineffective	3%	3%		-	7%	-
or expertise)	Don't Use	21%	24%		16%	24%	11%
	Don't Know	10%	12%		8%	10%	11%
	Use and Very Effective	27%	33%		21%	31%	11%
Apply heightened monitoring	Use and Somewhat effective	36%	30%		54%	17%	67%
and selectively block and reissue cards known to be on	Use and somewhat ineffective	4%	-		-	14%	-
breached card list	Don't Use	22%	27%		21%	21%	11%
breached card list	Don't Know	11%	9%		4%	17%	11%
	Use and Very Effective	17%	26%		-	23%	11%
	Use and Somewhat effective	18%	15%		8%	30%	22%
Provide customers online	Use and somewhat ineffective	10%	12%		16%	7%	-
services to dispute transactions	Don't Use	49%	47%		72%	33%	44%
	Don't Know	5%	-		4%	7%	22%
	Use and Very Effective	13%	6%		12%	23%	11%
	Use and Somewhat effective	5%	6%		4%	3%	11%
Allow customer to turn card off	Use and somewhat ineffective	3%	3%		4%	-	11%
when not in use	Don't Use	710/	700/		720/	670/	E 60/

79%

6%

72%

8%

71%

7%

Don't Use

Don't Know

56%

11%

67%

7%

What are the three current fraud attacks most often used to initiate check fraud against your financial institution or your customer's accounts?

		Respondent Size - Total Assets in Millions of Dollars							
		Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+			
Alternal and area of the alternation of the	1st Choice	22%	12%	23%	21%	17%			
Altered or forged checks presented for	2nd Choice	21%	17%	18%	25%	25%			
payment	3rd Choice	13%	13%	11%	16%	17%			
Countoufoit about a managet of for	1st Choice	30%	23%	28%	37%	29%			
Counterfeit checks presented for	2nd Choice	13%	17%	11%	12%	17%			
payment	3rd Choice	9%	8%	8%	11%	8%			
Countoufoit about a domesited force the	1st Choice	20%	21%	16%	17%	38%			
Counterfeit checks deposited (over-the-	2nd Choice	17%	17%	14%	23%	8%			
counter, ATM, RDC, etc.)	3rd Choice	9%	13%	3%	9%	13%			
	1st Choice	9%	15%	12%	5%	0%			
Check kiting	2nd Choice	8%	13%	7%	5%	8%			
	3rd Choice	22%	29%	25%	23%	-			
Alkanad au fannad alaaska dan asta d	1st Choice	10%	4%	7%	16%	17%			
Altered or forged checks deposited	2nd Choice	17%	15%	16%	16%	33%			
(over-the-counter, ATM, RDC, etc.)	3rd Choice	9%	8%	8%	9%	8%			
	1st Choice	1%	2%	3%	-	_			
Duplicate checks presented for payment	2nd Choice	6%	2%	9%	7%	-			
	3rd Choice	6%	4%	11%	4%	4%			
- II	1st Choice	3%	-	7%	1%	_			
Duplicate checks deposited (over-the-	2nd Choice	4%	6%	5%	3%	-			
counter, ATM, RDC, etc.)	3rd Choice	5%	2%	3%	9%	4%			
Identity theft or synthetic identity theft	1st Choice	2%	2%	4%	-	-			
used to establish new banking/demand	2nd Choice	1%	-	1%	1%	-			
deposit account or to defraud existing accounts	3rd Choice	4%	4%	3%	1%	17%			
	1st Choice	-	-	-	-	-			
Abuse of power of attorney to defraud vulnerable adult	2nd Choice	3%	2%	4%	3%	-			
vuinerable adult	3rd Choice	4%	2%	3%	5%	4%			
A	1st Choice	-	-	-	-	-			
Account takeover of customers'	2nd Choice	2%	-	4%	-	4%			
accounts	3rd Choice	4%	-	1%	4%	21%			
	1st Choice	1%	-	1%	1%	-			
Business email compromise	2nd Choice	1%	-	1%	3%	-			
·	3rd Choice	3%	_	4%	3%	4%			
Use of fraudulent credentials or other	1st Choice	-	-	-	-	-			
data to establish new accounts or to	2nd Choice	1%	_	1%	-	4%			
defraud existing accounts	3rd Choice	2%	2%	4%	1%	-			

		R	espondent	Size - Total Asset	ts in Millions o	f Dollars
		OverallLess	s than \$50	\$50 - \$199.9 \$20	00 - \$999.9	\$1000+
	Use and Very Effective	43%	42%	42%	48%	29%
Access credentials for remote	Use and Somewhat effective	40%	33%	42%	40%	38%
	Use and somewhat ineffective	3%	8%	-	1%	13%
deposit capture	Don't Use	9%	8%	13%	3%	17%
	Don't Know	5%	8%	2%	7%	4%
	Use and Very Effective	34%	47%	29%	30%	29%
	Use and Somewhat effective	35%	30%	42%	33%	38%
Signature verification	Use and somewhat ineffective	12%	10%	10%	11%	25%
	Don't Use	17%	10%	16%	26%	8%
	Don't Know	2%	3%	4%	-	
	Use and Very Effective	14%	9%	5%	19%	33%
	Use and Somewhat effective	17%	13%	8%	20%	42%
Positive pay services	Use and somewhat ineffective	1%	-	-	3%	4%
	Don't Use	60%	60%	80%	52%	17%
	Don't Know	9%	17%	7%	6%	4%
	Use and Very Effective	3%	2%	1%	3%	8%
	Use and Somewhat effective	7%	10%	4%	9%	8%
Payee positive services	Use and somewhat ineffective	1%	-	1%	3%	-
	Don't Use	78%	69%	85%	76%	79%
	Don't Know	11%	19%	8%	9%	4%
	Use and Very Effective	2%	-	3%	1%	4%
	Use and Somewhat effective	8%	4%	7%	6%	29%
Post no check services	Use and somewhat ineffective	-	-	-	1%	-
	Don't Use	72%	75%	80%	72%	46%

17%

12%

10%

19%

21%

Don't Know

				Size - Total Assets		f Dollars
		OverallLess	s than \$50	\$50 - \$199.9 \$200	- \$999.9	\$1000+
	Use and Very Effective	43%	43%	48%	42%	30%
Large dollar item review on	Use and Somewhat effective	37%	24%	39%	42%	48%
deposited or paid items	Use and somewhat ineffective	9%	9%	6%	10%	17%
deposited of paid items	Don't Use	8%	20%	3%	4%	4%
	Don't Know	3%	4%	4%	1%	-
	Use and Very Effective	30%	35%	33%	24%	29%
	Use and Somewhat effective	36%	29%	41%	42%	25%
Manual review	Use and somewhat ineffective	14%	9%	14%	18%	13%
	Don't Use	14%	16%	8%	13%	29%
	Don't Know	5%	11%	4%	3%	4%
	Use and Very Effective	30%	18%	32%	39%	25%
Duplicate check detection on	Use and Somewhat effective	33%	16%	35%	41%	38%
deposit items	Use and somewhat ineffective	7%	8%	5%	7%	13%
deposit items	Don't Use	25%	46%	24%	13%	21%
	Don't Know	4%	12%	4%	-	4%
	Use and Very Effective	30%	16%	32%	37%	38%
Duplicate check detection on	Use and Somewhat effective	33%	20%	33%	41%	33%
paid items	Use and somewhat ineffective	6%	8%	4%	7%	8%
para rems	Don't Use	25%	41%	27%	13%	17%
	Don't Know	6%	16%	4%	1%	4%
	Use and Very Effective	19%	19%	23%	16%	17%
	Use and Somewhat effective	37%	27%	31%	48%	50%
Value of items deposited or pai	d Use and somewhat ineffective	9%	10%	8%	11%	8%
	Don't Use	28%	37%	31%	21%	21%
	Don't Know	6%	8%	7%	3%	4%
	Use and Very Effective	19%	24%	22%	15%	13%
	Use and Somewhat effective	32%	29%	27%	31%	54%
Out of pattern activities	Use and somewhat ineffective	9%	5%	7%	15%	8%
	Don't Use	37%	35%	41%	38%	25%
	Don't Know	4%	7%	4%	1%	0%
	Use and Very Effective	19%	6%	22%	25%	22%
	Use and Somewhat effective	30%	6%	30%	41%	48%
Kite detection software	Use and somewhat ineffective	7%	4%	4%	13%	9%
	Don't Use	41%	79%	41%	20%	17%
	Don't Know	3%	6%	3%	1%	4%
	Use and Very Effective	11%	8%	13%	13%	8%
Velocity of items deposited or	Use and Somewhat effective	28%	19%	17%	38%	54%
paid	Use and somewhat ineffective	7%	6%	6%	8%	8%
	Don't Use	45%	52%	54%	38%	25%
	Don't Know	9%	15%	11%	5%	4%
	Use and Very Effective	15%	15%	14%	15%	21%
	Use and Somewhat effective	25%	28%	23%	24%	29%
Behavior analytics	Use and somewhat ineffective	4%	4%	1%	5%	13%
	Don't Use	47%	43%	51%	51%	33%
	Don't Know	8%	9%	11%	6%	4%
	Use and Very Effective	8%	8%	8%	12%	
Deathbox and the state	Use and Somewhat effective	11%	10%	8%	11%	26%
Positive and negative lists	Use and somewhat ineffective	4%	10%	1%	5%	
	Don't Use	66%	61%	76%	61%	57%
	Don't Know	10%	12%	6%	12%	17%
	Use and Very Effective	5%	4%	6%	3%	9%
Shared database screen/score	Use and Somewhat effective	10%	8%	9%	11%	17%
deposit items	Use and somewhat ineffective	1%	_	-	3%	
•	Don't Use	77%	80%	79%	79%	57%
	Don't Know	8%	8%	7%	5%	17%

		R	espondent	Size - Total Asset	s in Millions o	f Dollars
		Overall Less	s than \$50	\$50 - \$199.9 \$20	0 - \$999.9	\$1000+
	Use and Very Effective	47%	45%	47%	48%	46%
	Use and Somewhat effective	35%	18%	40%	38%	25%
Limit on total RDC deposit value	Use and somewhat ineffective	6%	9%	2%	5%	17%
	Don't Use	9%	9%	9%	6%	13%
	Don't Know	3%	18%	2%	3%	-
	Use and Very Effective	41%	55%	42%	38%	42%
	Use and Somewhat effective	36%	18%	38%	38%	29%
Limit on RDS per item value	Use and somewhat ineffective	6%	9%	2%	5%	17%
	Don't Use	14%	9%	15%	15%	13%
	Don't Know	3%	9%	2%	3%	
	Use and Very Effective	29%	36%	31%	29%	21%
Limit on number of RDC items	Use and Somewhat effective	35%	9%	35%	43%	25%
deposited	Use and somewhat ineffective	4%	-	-	6%	8%
	Don't Use	28%	36%	27%	19%	46%
	Don't Know	5%	18%	6%	3%	
	Use and Very Effective	23%	18%	28%	26%	4%
	Use and Somewhat effective	26%	36%	14%	26%	46%
Velocity checks on RDC items	Use and somewhat ineffective	5%	9%	4%	3%	13%
	Don't Use	36%	18%	40%	38%	33%
	Don't Know	10%	18%	14%	7%	4%
	Use and Very Effective	18%	9%	16%	24%	13%
	Use and Somewhat effective	17%	18%	16%	19%	13%
IP address verification	Use and somewhat ineffective	5%	-	-	8%	8%
	Don't Use	48%	45%	53%	37%	67%
	Don't Know	12%	27%	16%	11%	-
	Use and Very Effective	14%	18%	18%	11%	8%
Apply same screens/scoring	Use and Somewhat effective	18%	18%	6%	23%	33%
methods as used in non-RDC	Use and somewhat ineffective	4%	9%	4%	5%	-
check deposits	Don't Use	46%	27%	49%	44%	54%
	Don't Know	18%	27%	24%	16%	4%
	Use and Very Effective	5%	-	10%	3%	-
	Use and Somewhat effective	8%	-	4%	7%	21%
Device finger printing	Use and somewhat ineffective	4%	-	2%	5%	8%
	Don't Use	76%	100%	73%	78%	67%
	Don't Know	8%	-	12%	7%	4%

				Size - Total Assets \$50 - \$199.9 \$20		\$1000+
	Use and Very Effective	27%	34%	26%	28%	13%
Provide staff education and	Use and Somewhat effective	60%	41%	61%	67%	79%
training on check fraud risk	Use and somewhat ineffective	7%	13%	4%	6%	8%
mitigation	Don't Use	4%	5%	7%	-	_
3.7.5	Don't Know	3%	7%	3%	_	_
	Use and Very Effective	50%	50%	46%	54%	54%
	Use and Somewhat effective	35%	25%	42%	36%	38%
Apply exception holds on funds	Use and somewhat ineffective	8%	9%	7%	7%	8%
availability	Don't Use	5%	13%	4%	3%	
	Don't Know	1%	4%	1%	-	_
	Use and Very Effective	46%	37%	46%	53%	46%
Provide customers online	Use and Somewhat effective	37%	28%	45%	37%	38%
information services to view	Use and somewhat ineffective	7%	9%	4%	4%	17%
check images, statements, etc.	Don't Use	9%	25%	4%	6%	-
,	Don't Know	1%	2%	1%	-	-
Routinely apply standard check holds on funds availability	Use and Very Effective	40%	52%	26%	41%	50%
	Use and Somewhat effective	33%	28%	42%	30%	33%
	Use and somewhat ineffective	11%	7%	14%	11%	8%
	Don't Use	15%	10%	18%	18%	8%
	Don't Know	1%	3%	1%	-	-
	Use and Very Effective	27%	39%	27%	20%	17%
	Use and Somewhat effective	37%	25%	35%	47%	42%
Monitor customer return item	Use and somewhat ineffective	12%	18%	7%	13%	8%
rates	Don't Use	20%	16%	26%	14%	33%
	Don't Know	4%	4%	5%	6%	-
	Use and Very Effective	10%	9%	11%	12%	4%
Provide customer education and	•	33%	24%	26%	47%	33%
training on check fraud risk	Use and somewhat ineffective	27%	26%	23%	31%	33%
mitigation	Don't Use	25%	35%	33%	9%	25%
_	Don't Know	5%	6%	7%	1%	4%
	Use and Very Effective	25%	21%	17%	35%	33%
Provide customers alerts via	Use and Somewhat effective	25%	6%	31%	35%	21%
text, email, or within	Use and somewhat ineffective	9%	8%	13%	6%	13%
application	Don't Use	37%	58%	37%	24%	25%
	Don't Know	4%	8%	3%	-	8%
	Use and Very Effective	12%	21%	10%	10%	-
Prohibit customer/payee from	Use and Somewhat effective	12%	4%	13%	13%	21%
creating and depositing	Use and somewhat ineffective	6%	2%	3%	7%	17%
remotely created checks	Don't Use	61%	62%	63%	58%	58%
-	Don't Know	11%	11%	13%	10%	4%
	Use and Very Effective	6%	6%	4%	6%	13%
	Use and Somewhat effective	10%	8%	9%	12%	17%
Submit data to shared database	Use and somewhat ineffective	3%	4%	4%	1%	4%
and receive alerts		= -	, -			

72%

8%

69%

13%

76%

7%

75%

6%

63%

4%

and receive alerts

Don't Use

Don't Know

What are the three current fraud attacks most often used to initiate ACH fraud against your financial institution or your customer's accounts?

			Responden	t Size - Total As	sets in Millions of I	Dollars
		Overall	Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+
Fraudulent or unauthorized ACH debits	1st Choice	81%	89%	80%	78%	79%
	2nd Choice	10%	5%	12%	10%	13%
against consumer accounts	3rd Choice	2%	-	2%	1%	4%
Fraudulent or unauthorized ACH debits	1st Choice	6%	-	8%	6%	8%
	2nd Choice	42%	26%	38%	49%	54%
against business accounts	3rd Choice	9%	3%	12%	10%	4%
	1st Choice	3%	3%	3%	3%	-
Use of fraudulent credentials or other	2nd Choice	9%	11%	9%	7%	8%
data to defraud existing accounts	3rd Choice	15%	16%	15%	16%	8%
I de catte als effe en considerate tide catte als effe	1st Choice	2%	3%	3%	-	-
Identity theft or synthetic identity theft	2nd Choice	8%	13%	9%	6%	4%
used to defraud existing accounts	3rd Choice	12%	11%	9%	10%	25%
A	1st Choice	3%	3%	2%	4%	4%
Account takeover of customers'	2nd Choice	6%	% 3% % 8%	3%	6%	8%
accounts	3rd Choice	11%	3%	5%	13%	33%
	1st Choice	3%	-	-	6%	8%
Business email compromise schemes	2nd Choice	4%	3%	2%	7%	8%
	3rd Choice	9%	-	5%	16%	13%
Above of manner of ottomorphis defined	1st Choice	1%	-	2%	1%	-
Abuse of power of attorney to defraud vulnerable adult	2nd Choice	4%	5%	6%	3%	-
vullerable adult	3rd Choice	7%	8%	8%	7%	4%
Ouisinstan samusan amulana fuanda	1st Choice	1%	-	2%	-	-
Originator company employee frauds, e.g., payroll, invoice payment	2nd Choice	3%	5%	2%	3%	4%
e.g., payron, invoice payment	3rd Choice	2%	-	3%	3%	-
	1st Choice	1%	-	-	1%	-
Insider fraud	2nd Choice	1%	-	-	3%	-
	3rd Choice	1%	5%	-	-	-

Which of the following ACH originator/sender authentication methods does your financial institution use to mitigate ACH fraud risks?

Respondent Size - Total Assets in Millions of Dollars OverallLess than \$50 \$50 - \$199.9 \$200 - \$999.9 \$1000+ **Use and Very Effective** 58% 66% 54% 69% 30% Use and Somewhat effective 35% 31% 10% 26% 57% **ID** and Password for consumer Use and somewhat ineffective 2% 3% 1% 4% billpay Don't Use 7% 17% 8% 3% 4% Don't Know 2% 7% 4% **Use and Very Effective** 46% 27% 55% 43% 51% Use and Somewhat effective 29% 17% 40% 24% 27% Multi-factor authentication for Use and somewhat ineffective 3% 3% 2% 1% 14% consumer billpay Don't Use 19% 17% 14% 22% 27% **Don't Know** 3% 7% 2% 1% 5% Use and Very Effective 47% 40% 33% 57% 64% Multi-factor authentication with Use and Somewhat effective 22% 8% 27% 20% 27% originating company/third party Use and somewhat ineffective 2% 4% 4% 5% sender Don't Use 21% 28% 29% 17% 5% Don't Know 8% 20% 7% 7% **Use and Very Effective** 43% 44% 39% 47% 45% Use and Somewhat effective 25% 7% 25% 31% 32% **Dual control for originating** Use and somewhat ineffective 2% 4% 2% company file initiation Don't Use 21% 22% 25% 18% 23% 8% 9% Don't Know 26% 3% **Use and Very Effective** 35% 22% 36% 45% 29% **Evaluate new credential** Use and Somewhat effective 24% 11% 30% 24% 38% requests for originator before Use and somewhat ineffective 2% 2% 3% 2% 4% issuing Don't Use 29% 43% 26% 20% 29% Don't Know 10% 22% 5% 9% Use and Very Effective 30% 8% 31% 33% 50% Use and Somewhat effective 17% 23% 11% 36% Out-of-band authentication 13% with originating company/third Use and somewhat ineffective 2% 5% 1% Don't Use party sender 37% 35% 45% 41% 9% Don't Know 14% 35% 11% 13% **Use and Very Effective** 19% 9% 15% 25% 38% Use and Somewhat effective 17% 7% 20% 22% 21% IP address verification Use and somewhat ineffective 5% 5% 5% 6% 4% Don't Use 43% 49% 47% 37% 38% Don't Know 15% 29% 14% 11%

Use and Very Effective				Respondent	Size - Total Asset	ts in Millions o	f Dollars
OFAC monitoring Use and Somewhat ineffective 10% 29% 43% 49% 49% 29% 15% 16% 44% 48% 20m't Use and Somewhat ineffective 10% 10% 11% 44%							
OFAC monitoring Use and somewhat ineffective Don't Know 10% 10% 4% 4% 4% 4% 4% 4% 4% 4% 4% 5% - 3% - 4% - 3% - 4% - 4% - 3% - 4% - 3% - 4% - 3% - 4% - 3% - 4% - 3% - 4% - 2% 25% 3% - 4% - 25% 3% 6% 17% 22% 25% 25% 20m Lus and somewhat ineffective 26% 9% 6% 6% 7% 7% 7% 5% 4% Transaction value Use and Somewhat ineffective 26% 79% 26% 29% 39% 38% 4% 4% Don't Know 9% 22% 29% 34% 26% 29% 34% 26% 29% 34% 26% 27% 28%		Use and Very Effective	46%	52%	41%	45%	50%
Don't Use		Use and Somewhat effective	40%	29%	43%	43%	46%
Don't Know	OFAC monitoring	Use and somewhat ineffective	10%	10%	16%	4%	4%
Use and Very Effective 40% 49% 42% 33% 33% 25%		Don't Use	2%	5%	-	3%	-
Use and Somewhat effective 37% 27% 42% 42% 25% 25% 20m't Know 11% 9% 7% 12% 25%		Don't Know	2%	3%	-	4%	-
Manual review		Use and Very Effective	40%	49%	42%	33%	33%
Don't Use 11% 9% 7% 12% 25% 25% 26% 19% 26% 31% 29% 25% 25% 25% 25% 31% 29% 25% 25% 35%		Use and Somewhat effective	37%	27%	42%	42%	25%
Don't Know	Manual review	Use and somewhat ineffective	6%	5%	3%	6%	17%
Use and Very Effective		Don't Use	11%	9%	7%	12%	25%
Transaction value Use and somewhat ineffective Don't Know 9% 22% 7% 5% 2-7 5% 2-1 3% 20% 25% 29% 34% 32% 32% 34% 30% 42% 31% 32% 31% 32% 34% 30% 42% 31% 32% 31% 32% 34% 30% 42% 31% 32% 32% 34% 30% 42% 31% 32% 32% 34% 30% 42% 31% 32% 32% 32% 34% 30% 42% 32% 32% 32% 32% 32% 32% 32% 32% 32% 3		Don't Know	6%	9%	6%	6%	-
Transaction value Use and somewhat ineffective Don't Use Don't Use Don't Use Don't Use Don't Use 24% 37% 19% 22% 37% 15% 22% 31% 22% 37% 15% 22% 32% 32% 32% 34% 35% 34% 35% 32% 34% 35% 32% 34% 35% 32% 32% 34% 35% 32% 32% 32% 34% 35% 32% 32% 32% 32% 32% 32% 32% 32% 32% 32		Use and Very Effective	26%	19%	28%	31%	29%
Don't Use			34%	15%	39%	38%	54%
Don't Know 9% 22% 7% 5% 25% 29% 34% 30% 42% 25% 29% 34% 30% 42% 32% 34% 30% 42% 32% 34% 30% 42% 32% 34% 30% 42% 32% 34% 30% 42% 32% 34% 33% 44% 24% 25% 25% 26% 27% 28% 33% 34% 25% 25% 26% 27% 28% 33% 26% 27% 28% 33% 26% 27% 28% 33% 26% 27% 28% 33% 26% 27% 28% 33% 26% 27% 28% 33% 26% 27% 28% 33% 26% 27% 28% 33% 26% 27% 30% 46% 22% 38% 17% 22% 38% 17% 22% 38% 17% 22% 38% 17% 22% 38% 17% 22% 33% 34% 34% 25% 33% 26% 27% 22% 36% 22% 22% 36% 22% 22% 36% 22% 22% 36% 36% 22% 36%	Transaction value	Use and somewhat ineffective	6%	7%	7%	5%	4%
Use and Very Effective		Don't Use	24%	37%	19%	22%	13%
Use and Somewhat ineffective		Don't Know	9%	22%	7%	5%	_
Use and Somewhat effective		Use and Very Effective	29%	25%	29%	34%	25%
Don't Use		-	31%	23%	34%	30%	42%
Don't Use	Out of pattern activity						-
Don't Know	•	Don't Use	28%	26%	27%	28%	33%
Suspend originated files exceeding exposure limits Use and somewhat ineffective 24% 14% 22% 38% 17% 17% 18% 25% 33% 24% 34% 25% 33% 25%		Don't Know					-
Suspend originated files exceeding exposure limits Use and somewhat ineffective 24% 14% 22% 38% 17% 17% 18% 25% 33% 24% 34% 25% 33% 25%		Use and Very Effective					46%
Use and somewhat ineffective bon't Use and somewhat ineffective bon't Use 33% 41% 34% 25% 33% 33% 34% 34% 34% 25% 33% 33% 34% 34% 34% 25% 33% 35% 34% 34% 22% 35%	· ·		24%	14%	22%	38%	17%
Don't Use			3%			_	
Don't Know	exceeding exposure limits					25%	
Use and Very Effective 20% 13% 18% 22% 35% Use and Somewhat effective 22% 19% 21% 22% 30% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 30% 22% 32% 35% 41% 46% 26%		Don't Know					_
Use and Somewhat effective 22% 19% 21% 22% 30% 30% 9% 20% 35% 41% 46% 26%							35%
Anomaly/behavior analytics		-					
Don't Use	Anomaly/behavior analytics						
Don't Know 15% 31% 15% 6%	,,,,,						
Use and Very Effective 16% 11% 19% 17% 13% 13% Use and Somewhat effective 25% 11% 18% 33% 58% 58% 18% 18% 33% 58% 58% 18% 18% 33% 58% 18% 18% 26% 44% 27% 44% 27% 44% 27% 46% 46% 40% 41% 21% 21% 46% 46% 46% 40% 41% 21% 46%		Don't Know					_
Use and Somewhat effective 25% 11% 18% 33% 58% 26% 24%							13%
Velocity of ACH transactions Use and somewhat ineffective Don't Use Don't Use Don't Use Don't Know 40% 46% 46% 40% 41% 41% 21% 46% 40% 41% 21% 46% 40% 41% 21% 45% 46% 40% 41% 21% 45% 45% 45% 45% 45% 45% 45% 45% 45% 45			25%	11%	18%	33%	58%
Don't Use	Velocity of ACH transactions						
Don't Know		Don't Use				41%	
Use and Very Effective 14% 8% 13% 17% 21%							
Use and Somewhat effective 24% 10% 25% 27% 42% 42% 10% 25% 27% 42% 48% 42% 48% 42% 29% 20% 24%		Use and Very Effective					
Rules based fraud detection Use and somewhat ineffective Don't Use 5% 8% 3% 6% 4% Don't Use 43% 42% 48% 42% 29% Don't Know 14% 33% 10% 8% 4% Lise and Very Effective 12% 11% 6% 13% 25% Use and Somewhat effective 20% 20% 17% 18% 33% ACH block services Use and somewhat ineffective 3% 6% - 2% 8% Don't Use 51% 35% 70% 54% 29% Don't Know 15% 28% 8% 13% 4% ACH filter/positive pay services Use and Somewhat effective 9% 10% 3% 7% 29% ACH filter/positive pay services Use and somewhat ineffective 3% 4% 2% 5% 4% ACH filter/positive pay services Use and somewhat ineffective 3% 4% 2% 5% 4% Don't Know		•					
Don't Use	Rules based fraud detection	Use and somewhat ineffective					
Don't Know 14% 33% 10% 8% 4%							
Use and Very Effective 12% 11% 6% 13% 25%							
ACH block services Use and Somewhat effective 3% 6% - 2% 8% Don't Use Don't Use 51% 35% 70% 54% 29% Don't Know 15% 28% 8% 13% 4% Use and Very Effective 9% 10% 3% 7% 29% Use and Somewhat effective 16% 10% 9% 20% 38% ACH filter/positive pay services Use and somewhat ineffective 3% 4% 2% 5% 4% Don't Use Don't Use 55% 39% 74% 59% 25% Don't Know 17% 37% 12% 10% 4% Use and Very Effective 5% 6% 7% 5% - Use and Very Effective 6% 8% 6% 5% 8% Use and Somewhat effective 6% 8% 6% 5% 8% Use and Somewhat ineffective 1% - 1% 2% 4% Don't Use Don't Use Ton't Use Ton							
ACH block services Use and somewhat ineffective Don't Use 3% 6% - 2% 8% Don't Use Don't Know 51% 35% 70% 54% 29% Don't Know 15% 28% 8% 13% 4% Use and Very Effective Use and Somewhat effective Use and somewhat ineffective Don't Use Don't Use Don't Use Don't Know 3% 4% 2% 5% 4% Don't Know 17% 37% 12% 10% 4% Shared database screen/score deposit items Use and Somewhat effective Use Don't Use 6% 8% 6% 5% 8% Don't Use 71% 57% 72% 78% 79%							
Don't Use Don't Know Don't Use Don't Use Don't Use Don't Use Don't Know Don't Kn	ACH block services						
Don't Know 15% 28% 8% 13% 4%					70%		
Use and Very Effective 9% 10% 3% 7% 29%							
Use and Somewhat effective 16% 10% 9% 20% 38%							
ACH filter/positive pay services Use and somewhat ineffective Don't Use 3% 4% 2% 5% 4% Don't Use 55% 39% 74% 59% 25% Don't Know 17% 37% 12% 10% 4% Use and Very Effective 5% 6% 7% 5% - Shared database screen/score deposit items Use and Somewhat effective 6% 8% 6% 5% 8% Use and somewhat ineffective Don't Use 71% 57% 72% 78% 79%							
Don't Use 55% 39% 74% 59% 25% Don't Know 17% 37% 12% 10% 4% Shared database screen/score deposit items Use and Somewhat effective 5% 6% 7% 5% 8% Use and Somewhat ineffective deposit items 1% - 1% 2% 4% Don't Use 71% 57% 72% 78% 79%	ACH filter/positive pay services						
Don't Know 17% 37% 12% 10% 4% Use and Very Effective 5% 6% 7% 5% - Shared database screen/score deposit items Use and Somewhat effective 6% 8% 6% 5% 8% Use and somewhat ineffective deposit items 1% - 1% 2% 4% Don't Use 71% 57% 72% 78% 79%	,						
Use and Very Effective 5% 6% 7% 5% - Shared database screen/score deposit items Use and Somewhat effective 6% 8% 6% 5% 8% Use and somewhat ineffective deposit items 1% - 1% 2% 4% Don't Use 71% 57% 72% 78% 79%							
Shared database screen/score deposit items Use and Somewhat effective 6% 8% 6% 5% 8% 6% 6% 5% 4% 6% 5% 4% 6% 5% 6% 5% 6% 5% 6% 5% 6% 6% 5% 6% 5% 6% 5% 6% 5% 6% 5% 6% 5% 6% 5% 6% 5% 6% 5% 6% 5% 6% 5% 6% 5% 6% 6% 5% 6% 6% 5% 6% 6% 6% 6% 6% 6% 6% 6% 6% 6% 6% 6% 6%							- 170
Shared database screen/score deposit items Use and somewhat ineffective 1% - 1% 2% 4% 70% 57% 72% 78% 79%							8%
deposit items Don't Use 71% 57% 72% 78% 79%	-			-			
	deposit items			57%			

Respondent Size - Total Assets in Millions of Dollars

		OverallLess	than \$50	\$50 - \$199.9 \$20	0 - \$999.9	\$1000+
	Use and Very Effective	50%	48%	45%	55%	50%
Provide customers online	Use and Somewhat effective	37%	17%	48%	37%	42%
information services to view	Use and somewhat ineffective	4%	4%	4%	4%	4%
transactions, statements, etc.	Don't Use	7%	21%	3%	1%	4%
	Don't Know	3%	10%	-	1%	-
	Use and Very Effective	29%	35%	26%	29%	25%
Provide staff education and	Use and Somewhat effective	53%	33%	56%	63%	58%
training on ACH fraud risk	Use and somewhat ineffective	8%	6%	10%	4%	17%
mitigation	Don't Use	7%	16%	8%	-	-
	Don't Know	3%	10%	-	3%	-
	Use and Very Effective	50%	48%	48%	52%	50%
	Use and Somewhat effective	28%	7%	33%	33%	27%
Limit ACH origination to domestic transactions	Use and somewhat ineffective	1%	_	4%	-	-
	Don't Use	17%	33%	11%	12%	23%
	Don't Know	4%	11%	4%	3%	_
	Use and Very Effective	26%	29%	19%	34%	17%
	Use and Somewhat effective	39%	21%	45%	42%	58%
Monitor customer return item rates	Use and somewhat ineffective	8%	11%	9%	4%	13%
	Don't Use	18%	25%	21%	12%	8%
	Don't Know	8%	14%	6%	7%	4%
	Use and Very Effective	15%	13%	16%	13%	21%
Provide customer education and		35%	21%	31%	52%	29%
training on ACH fraud risk mitigation	Use and somewhat ineffective	24%	17%	24%	22%	42%
	Don't Use	22%	38%	28%	10%	4%
	Don't Know	5%	13%	1%	3%	4%
	Use and Very Effective	24%	16%	21%	30%	33%
Provide customers alerts via	Use and Somewhat effective	19%	2%	25%	22%	29%
text, email, or within	Use and somewhat ineffective	8%	6%	6%	9%	13%
application	Don't Use	41%	64%	43%	28%	25%
	Don't Know	8%	12%	6%	11%	
	Use and Very Effective	22%	12%	28%	23%	25%
Originator services to establish	Use and Somewhat effective	25%	10%	16%	41%	38%
batch-level thresholds to hold	Use and somewhat ineffective	4%	4%	3%	5%	4%
batches for added	Don't Use	40%	54%	48%	23%	33%
authorizations	Don't Know	9%	20%	6%	8%	-
	Use and Very Effective	19%	12%	21%	21%	26%
	Use and Somewhat effective	23%	10%	24%	32%	22%
Provide account masking	Use and somewhat ineffective	5%	2%	6%	5%	13%
services	Don't Use	38%	50%	38%	29%	35%
	Don't Know	15%	26%	12%	13%	4%
	Use and Very Effective	15%	16%	21%	13%	4%
Funds availability delay when	Use and Somewhat effective	24%	27%	24%	23%	25%
reasonably suspect ACH credit	Use and somewhat ineffective	7%	2%	6%	8%	17%
received is unauthorized	Don't Use	38%	37%	34%	40%	42%
	Don't Know	16%	18%	16%	16%	13%
	Use and Very Effective	13%	16%	12%	11%	13%
Established procedures for	Use and Somewhat effective	21%	14%	21%	21%	42%
identifying money mule	Use and somewhat ineffective	9%	4%	7%	11%	17%
accounts	Don't Use	41%	40%	49%	38%	29%
	Don't Know	16%	26%	12%	19%	23/0
	DOII (KIIUW	10%	20%	12%	19%	

Continued - Which of the following reporting and other risk management methods does your financial institution use to mitigate ACH fraud risks?

		R	espondent	Size - Total Asset	s in Millions o	f Dollars
		OverallLess	than \$50	\$50 - \$199.9 \$20	0 - \$999.9	\$1000+
	Use and Very Effective	17%	10%	13%	22%	33%
Provide ACH originator alerts,	Use and Somewhat effective	20%	16%	18%	28%	13%
e.g., notice of new payee	Use and somewhat ineffective	5%	6%	1%	6%	13%
added	Don't Use	48%	51%	60%	35%	42%
	Don't Know	10%	18%	7%	9%	-
Provide ACH receiver alerts, e.g	Use and Very Effective	14%	14%	10%	20%	13%
	Use and Somewhat effective	20%	10%	16%	26%	33%
	'Use and somewhat ineffective	6%	-	3%	11%	17%
ACH debit alerts	Don't Use	46%	53%	60%	30%	38%
	Don't Know	13%	24%	10%	14%	-
	Use and Very Effective	11%	22%	8%	7%	8%
Out	Use and Somewhat effective	13%	18%	15%	7%	8%
Outsource ACH processing and	Use and somewhat ineffective	2%	-	-	3%	4%
risk management	Don't Use	67%	45%	74%	72%	79%
	Don't Know	8%	14%	3%	12%	-
	Use and Very Effective	8%	10%	7%	8%	4%
Duranida anatamana antina	Use and Somewhat effective	6%	2%	4%	8%	17%
Provide customers online	Use and somewhat ineffective	2%	-	1%	3%	4%
services to dispute transactions	Don't Use	79%	78%	84%	78%	71%
	Don't Know	5%	10%	3%	3%	4%

What are the three current fraud attacks most often used to initiate wire fraud against your financial institution or your customer's accounts?

		Respondent Size - Total Assets in Millions of Do. Overall Less than \$50 \$50 - \$199.9 \$200 - \$999.9					
			Less than \$50	\$50 - \$199.9	\$200 - \$999.9	\$1000+	
	1st Choice	36%	-	24%	45%	74%	
Business email compromise schemes	2nd Choice	14%	-	15%	18%	13%	
	3rd Choice	5%	5%	6%	4%	4%	
	1st Choice	28%	32%	35%	21%	22%	
Consumer victim frauds	2nd Choice	16%	11%	9%	21%	22%	
	3rd Choice	9%	-	2%	13%	22%	
Use of fraudulent credentials or other	1st Choice	7%	5%	9%	7%	-	
	2nd Choice	14%	26%	11%	11%	17%	
data to defraud existing accounts	3rd Choice	11%	-	4%	18%	17%	
A	1st Choice	9%	5%	6%	14%	4%	
Account takeover of customers'	2nd Choice	9%	11%	4%	7%	26%	
accounts	3rd Choice	11%	11%	6%	13%	22%	
til - saturalis of a survival - at - til - saturalis - fa	1st Choice	3%	11%	2%	4%	-	
Identity theft or synthetic identity theft	2nd Choice	10%	5%	9%	11%	13%	
used to defraud existing accounts	3rd Choice	13%	21%	9%	14%	9%	
	1st Choice	3%	11%	2%	2%	-	
Originator company employee frauds	2nd Choice	4%	5%	-	7%	4%	
	3rd Choice	5%	11%	6%	-	9%	
	1st Choice	1%	5%	2%	-	-	
Abuse of power of attorney to defraud vulnerable adult	2nd Choice	7%	5%	7%	9%	-	
	3rd Choice	3%	5%	4%	4%	-	
	1st Choice	2%	-	2%	4%	-	
Insider fraud	2nd Choice	2%	5%	2%	-	4%	
	3rd Choice	3%	5%	2%	5%	_	

Respondent Size - Total Assets in Millions of Dollars OverallLess than \$50 \$50 - \$199.9 \$200 - \$999.9 \$1000+ Use and Very Effective 70% 56% 63% 66% 85% Use and Somewhat effective 18% 19% 21% 12% 25% Use and somewhat ineffective 5% Telephone callback verification 2% 8% 9% 14% Don't Use 14% 3% 4% Don't Know 1% 7% 33% Use and Very Effective 57% 55% 59% 58% Use and Somewhat effective 26% 20% 33% 27% 17% Signature verification Use and somewhat ineffective 8% 5% 6% 7% 21% Don't Use 8% 10% 4% 6% 25% 2% Don't Know 7% 1% 4% **Use and Very Effective** 57% 67% 51% 60% 54% Use and Somewhat effective 20% 17% 20% 20% 29% **Dual control for originating** Use and somewhat ineffective 3% 2% 3% 2% 13% company wire initiation Don't Use 7% 25% 16% 17% 7% Don't Know 3% 1% 2% 4% Use and Very Effective 34% 33% 30% 41% 30% Use and Somewhat effective 26% 20% 25% 29% 35% Evaluate new credential Use and somewhat ineffective requests for originator before 2% 5% 2% 4% issuing 29% 25% 39% 24% 22% Don't Use Don't Know 8% 18% 5% 6% 9% Use and Very Effective 29% 42% 50% 39% 44% **Use and Somewhat effective** 11% 12% 12% 13% 4% Limit consumer initiated wires to in person requests with valid Use and somewhat ineffective 2% 2% 2% 4% 1% government issued ID 44% 40% Don't Use 31% 48% 63% Don't Know 2% 5% 2% **Use and Very Effective** 37% 38% 21% 44% 58% Use and Somewhat effective 14% 15% 8% 17% 17% Multi-factor authentication with Use and somewhat ineffective 1% 3% 2% originating company Don't Use 44% 33% 68% 36% 21% Don't Know 4% 10% 2% 3% 4% **Use and Very Effective** 24% 30% 11% 22% 54% Use and Somewhat effective 12% 8% 10% 16% 17% **Out-of-band authentication** Use and somewhat ineffective 2% 5% with originating company Don't Use 53% 48% 70% 51% 21% Don't Know 9% 15% 10% 6% 8% Use and Very Effective 12% 8% 11% 14% 17% Use and Somewhat effective 9% 5% 6% 11% 21% IP address verification Use and somewhat ineffective 4% 6% 13% Don't Use 66% 75% 78% 57% 46% 4% Don't Know 8% 13% 5% 11% Use and Very Effective 2% 3% 2% Use and Somewhat effective 2% 3% 2% **Device finger printing** Use and somewhat ineffective 2% 3% 8% Don't Use 90% 90% 91% 90% 88% Don't Know 5% 10% 3% 3% 4%

		R	f Dollars			
		OverallLess	than \$50	\$50 - \$199.9 \$2	00 - \$999.9	\$1000+
	Use and Very Effective	47%	51%	42%	45%	58%
	Use and Somewhat effective	38%	29%	44%	38%	38%
OFAC monitoring	Use and somewhat ineffective	10%	11%	11%	9%	4%
	Don't Use	2%	2%	3%	3%	-
	Don't Know	3%	7%	-	5%	-
	Use and Very Effective	63%	71%	67%	59%	48%
	Use and Somewhat effective	27%	16%	27%	35%	30%
Manual review	Use and somewhat ineffective	3%	2%	3%	-	17%
	Don't Use	4%	4%	4%	3%	4%
	Don't Know	2%	7%	-	3%	-
	Use and Very Effective	33%	41%	34%	28%	26%
	Use and Somewhat effective	37%	23%	36%	44%	48%
Transaction value	Use and somewhat ineffective	8%	10%	6%	8%	13%
	Don't Use	18%	21%	20%	16%	13%
	Don't Know	4%	5%	4%	5%	-
	Use and Very Effective	38%	42%	42%	32%	35%
	Use and Somewhat effective	32%	23%	27%	45%	26%
Out of pattern activity	Use and somewhat ineffective	7%	5%	7%	6%	17%
	Don't Use	18%	21%	21%	14%	17%
	Don't Know	4%	9%	3%	3%	4%
	Use and Very Effective	20%	19%	25%	15%	17%
	Use and Somewhat effective	25%	17%	22%	28%	39%
Velocity of wire transactions	Use and somewhat ineffective	7%	7%	4%	10%	9%
	Don't Use	40%	48%	38%	40%	30%
	Don't Know	8%	10%	10%	7%	4%
	Use and Very Effective	22%	26%	22%	13%	41%
Conserved animinate desiran	Use and Somewhat effective	25%	18%	18%	35%	27%
Suspend originated wires	Use and somewhat ineffective	4%	3%	-	8%	5%
exceeding exposure limits	Don't Use	41%	39%	52%	38%	18%
	Don't Know	9%	13%	8%	6%	9%
	Use and Very Effective	23%	33%	25%	13%	30%
	Use and Somewhat effective	23%	15%	16%	29%	39%
Anomaly/behavior analytics	Use and somewhat ineffective	3%	-	3%	3%	9%
	Don't Use	45%	41%	50%	52%	17%
	Don't Know	6%	10%	6%	3%	4%
	Use and Very Effective	16%	22%	15%	10%	26%
	Use and Somewhat effective	16%	24%	8%	18%	22%
Rules based fraud detection	Use and somewhat ineffective	5%	-	5%	2%	22%
	Don't Use	53%	44%	64%	61%	22%
	Don't Know	9%	10%	9%	10%	9%

Respondent Size - Total Assets in Mill	ions o	f Dollars
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		OverallLess	than \$50	\$50 - \$199.9 \$20	0 - \$999.9	\$1000+
	Use and Very Effective	37%	51%	36%	32%	26%
Provide staff education and	Use and Somewhat effective	51%	36%	47%	62%	65%
training on wire fraud risk mitigation	Use and somewhat ineffective	6%	4%	8%	4%	9%
	Don't Use	3%	2%	7%	1%	-
	Don't Know	2%	7%	1%	-	
	Use and Very Effective	54%	60%	52%	55%	50%
Provide customers online	Use and Somewhat effective	34%	12%	40%	40%	42%
information services to view	Use and somewhat ineffective	5%	5%	5%	4%	4%
transactions, statements, etc.	Don't Use	5%	17%	3%	-	4%
	Don't Know	1%	7%	_	-	
	Use and Very Effective	61%	60%	52%	69%	67%
Refuse to send consumer	Use and Somewhat effective	20%	7%	30%	19%	17%
initiated wire when suspect	Use and somewhat ineffective	7%	5%	4%	9%	17%
fraud scheme	Don't Use	7%	14%	8%	3%	-
	Don't Know	5%	14%	5%	-	
	Use and Very Effective	12%	7%	15%	12%	13%
Provide customer education and	d Use and Somewhat effective	33%	31%	19%	51%	29%
training on wire fraud risk	Use and somewhat ineffective	22%	17%	24%	20%	33%
mitigation	Don't Use	27%	38%	33%	17%	17%
	Don't Know	6%	7%	9%	-	8%
	Use and Very Effective	32%	41%	31%	32%	21%
Funds availability delay when	Use and Somewhat effective	28%	12%	28%	36%	33%
reasonably suspect wire	Use and somewhat ineffective	6%	5%	4%	3%	21%
received is unauthorized	Don't Use	25%	29%	28%	21%	17%
	Don't Know	9%	12%	9%	8%	8%
Complete standard list of questions with consumer	Use and Very Effective	30%	33%	29%	29%	29%
	Use and Somewhat effective	24%	16%	23%	31%	25%
	Use and somewhat ineffective	11%	9%	9%	10%	21%
initiated wires	Don't Use	31%	35%	35%	29%	21%
	Don't Know	4%	7%	4%	2%	4%
	Use and Very Effective	23%	22%	17%	26%	33%
Provide recurring wire	Use and Somewhat effective	28%	22%	21%	39%	33%
templates to originators with	Use and somewhat ineffective	6%	7%	3%	6%	8%
role based security for changes	Don't Use	39%	41%	53%	27%	25%
	Don't Know	4%	7%	6%	2%	
	Use and Very Effective	21%	24%	16%	25%	21%
Provide customers alerts via	Use and Somewhat effective	23%	-	26%	33%	29%
text, email, or within application	Use and somewhat ineffective	7%	2%	6%	8%	17%
	Don't Use	45%	66%	49%	32%	33%
	Don't Know	3%	7%	3%	2%	
Established procedures for	Use and Very Effective	13%	20%	11%	16%	4%
	Use and Somewhat effective	24%	17%	20%	25%	46%
identifying money mule	Use and somewhat ineffective	5%	-	5%	5%	17%
accounts	Don't Use	46%	44%	56%	42%	33%
	Don't Know	11%	20%	9%	13%	

Continued - Which of the following reporting and other risk management methods does your financial institution use to mitigate wire fraud risks?

			Respondent Size - Total Assets in Millions of Dollars				
		- Overall	Less than \$50	\$50 - \$199.9 \$20	0 - \$999.9	\$1000+	
	Use and Very Effective	24%	48%	23%	18%	-	
Limit voice existentian to	Use and Somewhat effective	14%	7%	20%	11%	17%	
Limit wire origination to domestic transactions	Use and somewhat ineffective	1%	-	1%	-	4%	
domestic transactions	Don't Use	58%	39%	55%	69%	75%	
	Don't Know	3%	7%	-	2%	4%	
	Use and Very Effective	8%	10%	4%	11%	4%	
	Use and Somewhat effective	6%	2%	6%	6%	13%	
Provide customers online services to dispute transactions	Use and somewhat ineffective	2%	-	-	2%	8%	
services to dispute transactions	Don't Use	82%	78%	90%	80%	71%	
	Don't Know	3%	10%	-	2%	4%	
Outsource wire processing and risk management	Use and Very Effective	6%	17%	7%	-	-	
	Use and Somewhat effective	5%	17%	3%	2%	-	
	Use and somewhat ineffective	1%	2%	-	2%	-	
	Don't Use	84%	54%	88%	94%	96%	
	Don't Know	4%	10%	1%	3%	4%	

		Re	f Dollars			
				\$50 - \$199.9 \$20		\$1000+
Address exception items timely,	Use and Very Effective	62%	66%	60%	60%	63%
e.g., meet deadlines for chargebacks, returning payments, etc.	Use and Somewhat effective	28%	15%	31%	35%	25%
	Use and somewhat ineffective	3%	4%	3%	1%	8%
	Don't Use	4%	6%	5%	1%	-
	Don't Know	4%	9%	1%	1%	4%
	Use and Very Effective	70%	59%	67%	82%	71%
Dual controls and segregation of	f Use and Somewhat effective	20%	18%	25%	15%	25%
duties within payment initiation	Use and somewhat ineffective	-	-	1%	-	-
and receipt processes	Don't Use	7%	16%	7%	3%	-
	Don't Know	2%	7%	-	-	4%
	Use and Very Effective	66%	65%	64%	69%	63%
Authentication and	Use and Somewhat effective	22%	13%	26%	21%	33%
authorization controls to	Use and somewhat ineffective	2%	2%	3%	3%	-
payment processes	Don't Use	4%	7%	4%	3%	-
	Don't Know	6%	13%	3%	4%	4%
Transaction/file approval limits	Use and Very Effective	58%	53%	55%	66%	58%
	Use and Somewhat effective	28%	25%	32%	25%	25%
	Use and somewhat ineffective	3%	-	4%	3%	8%
	Don't Use	8%	15%	7%	4%	4%
	Don't Know	3%	8%	1%	1%	4%
	Use and Very Effective	59%	62%	57%	59%	54%
	Use and Somewhat effective	28%	21%	26%	35%	33%
Physical access controls to payment processing functions	Use and somewhat ineffective	1%	_	4%	-	-
	Don't Use	8%	8%	12%	3%	8%
	Don't Know	4%	9%	1%	3%	4%
Logical access controls to your	Use and Very Effective	64%	52%	67%	72%	63%
	Use and Somewhat effective	21%	13%	26%	18%	33%
computing network and	Use and somewhat ineffective	-	2%	-	-	-
payment processing	Don't Use	9%	21%	5%	6%	-
applications	Don't Know	5%	12%	1%	4%	4%
	Use and Very Effective	42%	43%	38%	46%	38%
Restrict or limit employee use of		32%	32%	35%	28%	33%
Internet from financial	Use and somewhat ineffective	10%	2%	8%	16%	17%
institution's network	Don't Use	13%	16%	18%	9%	4%
	Don't Know	3%	7%	1%	-	8%
	Use and Very Effective	65%	56%	69%	69%	63%
Prohibit use of personal devices	Use and Somewhat effective	17%	9%	20%	16%	25%
for processing of financial	Use and somewhat ineffective	1%	4%	1%	-	-
institution's payment transactions	Don't Use	12%	22%	8%	12%	4%
	Don't Know	5%	9%	1%	3%	8%
Dedicated computer used to	Use and Very Effective	26%	23%	28%	28%	21%
conduct transactions with	Use and Somewhat effective	13%	10%	11%	15%	17%
payments network operator,	Use and somewhat ineffective	2%	4%	11/0	-	8%
correspondent bank, or	Don't Use	54%	54%	60%	- E 10/	42%
financial service provider	Don't Ose Don't Know				54% 2%	
iniancial service provider	DOIL F KHOW	5%	10%	1%	3%	13%