# STATEWIDE ELECTRONIC COMMERCE PROGRAM

### **INFO & UPDATES**

Taylor Brumbeloe, NC Office of the State Controller Brandon Watson, Department of State Treasurer Melissa Rivenbark, Department of State Treasurer

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# STATEWIDE CONTRACTS

Merchant PCI Compliance

Electronic Funds Transfer

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# MERCHANT CARD CONTRACT

SunTrust Merchant Services → Acquirer

First Data → Processor

Current contract expires February 2022

RFP for new contract will go out early 2021

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# MERCHANT CARD CONTRACT

# Amendment 1 Dec 2015

- Quarterly Admin Fee
- \$.0035 x Number of transactions
- Helps fund cost of PCI Compliance services

# Amendment 2 Nov 2016

- EBT (Electronic Benefits Transfer)
   Addendum
- Updated Fee Schedule
- Updated contract language per Legislation

### MERCHANT CARD CONTRACT

## Amendment 3 – In Process

- Convenience Fee Services
- CardConnect Services
- Clover Devices

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### MERCHANT CARD CONTRACT

# Capture Methods:

- Point of Sale Terminals
  - Wired FD130, Clover Systems
  - Wireless FD410, Clover Go
- Online Gateways
  - Payeezy
  - PayPoint
  - 3<sup>rd</sup> party gateways with First Data integration



### MERCHANT CARD CONTRACT

## **New Account Setup**

- All forms completed electronically through DocuSign
- OSC review and turnaround within 2 business days
- First Data setup time is 10-15 business days

### Clientline Setup or Changes to Existing Account

- All forms completed electronically through DocuSign
- OSC review and turnaround within 2 business days
- First Data completion time is 5-10 business days

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## **PCI SERVICES CONTRACT**

Coalfire → Vulnerability
Scanning

VigiTrust → Self-Assessment
Questionnaire

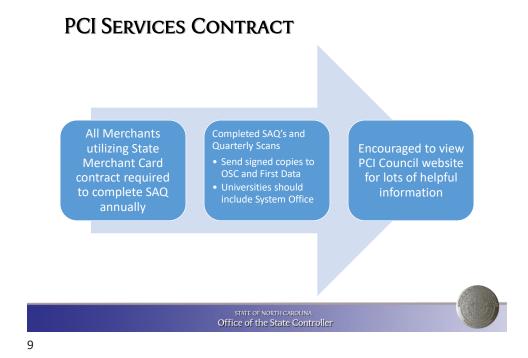
Current contract expires Dec 2019

RFP for new contract in development now

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# **ELECTRONIC FUNDS TRANSFER CONTRACT**



### **ELECTRONIC FUNDS TRANSFER CONTRACT**

#### Amendment 1 Nov 2014

- Returns account overdraft fees
- UPIC service
- Electronic
   Data
   Interchange
   service

### Amendment 2 Jan 2015

Prepaid card service

### Amendment 3 Jun 2018

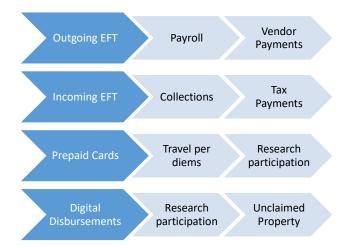
- 1 year contract extension
- Update to State's contract terms & conditions

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### **ELECTRONIC FUNDS TRANSFER CONTRACT**





### **EXEMPTION PROCESS**

### **Exemption from State Contracts**

- Required for State Agencies & Universities
- Business case
- Compliance due diligence
- Cost Analysis
- · Submitted to OSC



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### **EXEMPTION PROCESS**

# Exemption from Daily Deposit Act

- §147-77. Daily deposit of funds to credit of Treasurer
- §116-40.22(e). Management Flexibility UNC System
- Required for State Agencies & Universities
- Business case
- Submitted to Dept of State Treasurer



### **COMMON ERRORS**

#### Neglecting to fund the ACH file

- Impacts cash flow calculations
- Could result in ACH file being held by the bank
- Could cause accounts to go into the negative

# Sending an ACH file with a same day effective date

• Higher cost for same day transmission

# Sending a duplicate ACH

- Can be difficult to retrieve duplicate payments
- Duplicate debits could cause fees and harm reputation

Missing a daily deadline

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### **COMMON ERRORS – FUNDING ERROR**

Funds to
Disbursing
Account

Transfer Funds from Disbursing to FFT Account

send ACH File to the Bank



### **COMMON ERRORS – DUPLICATE FILE**

- Establish proper internal controls to avoid and detect this type of error prior to file submission
- If file hasn't been distributed, it can be deleted
- Reversal request must be submitted within 5 days
- Can reverse individual items or the whole file
- All reversals are best efforts basis



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### **COMMON ERRORS – DAILY DEADLINES**

#### 10:00 a.m.

 All funds transfer requests due to DST.

#### 10:30 a.m.

 Requisitions submitted in CMCS

#### 11:30 a.m.

 Last day of month deadline to submit requisitions in CMCS



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### **EFTS & THIRD PARTY PROVIDERS**

# Involve OSC and/or DST as early on in the process as possible.

- · Allow 3 weeks for account opening
- Confirm compliance with State statutes and policies
- · Will review wording for RFP's

#### Ultimate Payee - §147-86.11(f)(1)

• "Moneys deposited with the State Treasurer remain on deposit with the State Treasurer until final disbursement to the ultimate payee."

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### **EFTS & THIRD PARTY PROVIDERS**

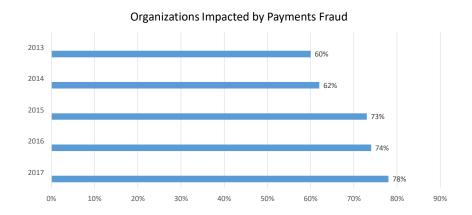
Two Ultimate Payee Compliant Models

Third party creates the ACH file and transmits to the bank. Also submits a funding request to the agency to fund the file if needed. The funds flow out of or into a State Treasurer account.

Third party creates the ACH file and transmits the file to its bank. The third party uses its funds for ACH payments and seeks reimbursement from the agency.

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## **PAYMENTS FRAUD**



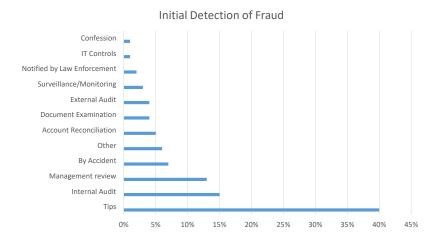
source: 2018 AFP Payments Fraud and Control Survey Report

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# **PAYMENTS FRAUD - DETECTION**



source: 2018 Report to the Nations-Global study on Occupational Fraud and Abuse

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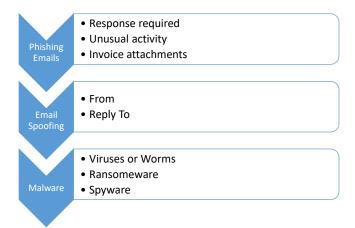
# **PAYMENTS FRAUD**



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# **PAYMENTS FRAUD**

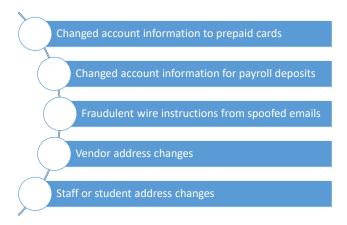


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# **PAYMENTS FRAUD**







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## **ACH FRAUD PREVENTION**

### **Internal Controls**

- How do you handle changes to bank account information?
- Verifying change requests
- Removing accounting policies from the internet

### **Education**

- Staff onboarding
- Student orientation
- Ongoing training

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## **ACH FRAUD PREVENTION**

### **Tools**

- ACH Debit Blocks
- ACH Debit Filters
- Account Validation Service
  - Provides access to a database of U.S. bank accounts
    - Can be used to verify bank account information
    - · Banks must be part of the network
    - · Cost can be prohibitive



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# **ACH FRAUD - THE AFTERMATH**

### **Gather Information**

- Where/when/how was the fraud detected
- · Number of items in the file
- Total \$ amount impacted by fraud
- Total \$ amount of the file
- · File effective date
- Date file was sent to the bank
- New prepaid cards present in the file





# **ACH FRAUD – THE AFTERMATH**

### Calls to make

- Department of State Treasurer
- · Office of the State Controller
- Bank
  - Initiate an ACH file reversal
  - Be wary of signing any type of indemnity agreement
- Local Law Enforcement
- State Bureau of Investigation
- Your Legal Staff



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# **SUBMITTED QUESTIONS**

### Question:

State agencies work with First Data to acquire new point of sale equipment and deactivate old equipment. Can you go over the process, start to finish?



## **SUBMITTED QUESTIONS**

#### Question:

The payment solutions field is constantly changing. Does the State or OSC have a preferred vendor for electronic P2P transactions? We have requests to use Zelle or Venmo for payments to student athletes, study subject payments for research and even vendor payments.

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# **SUBMITTED QUESTIONS**

### Question:

Is there a Master Service Agreement with DocuSign for eSignature?

## **SUBMITTED QUESTIONS**

Question:

Can we create a UNC System PCI/eCommerce listserv to be able to ask questions and get additional information?



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# **SUBMITTED QUESTIONS**

Question:

There are lots of benefits to a 3<sup>rd</sup> party service provider acting as the MOR (Merchant of Record) because it takes a lot of the PCI responsibility off the agency or school. But most 3<sup>rd</sup> parties don't settle within 24 hours which goes against the Daily Deposit Act. Can a 3<sup>rd</sup> party remit once they hit the \$5,000 threshold? When would an exemption be required?



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# **SUBMITTED QUESTIONS**

Question:

Does each entity need to request an exemption from the Daily Deposit Act or is there a list of service providers who have been granted exemption from the Daily Deposit Act that can be shared?

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# **SUBMITTED QUESTIONS**

Question:

Can we revive the Quarterly PCI/eCommerce conference calls that used to be run by OSC?

### **CONTACT INFORMATION**

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