PCI DSS Lessons Learned
Educause Security Conference 2008

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Overview

1. The Penn State Community
2. IPAS Project Overview
3. Compliance Approach
4. Misconceptions
5. Lessons Learned
Who is Penn State?

1. 24 Campus Locations
   • Distributed across Commonwealth
   • Why we take cards

2. 52 Merchant Areas
   • Swipe terminals (dial-up, IP-based)
   • In-house eCommerce
   • Third-party applications
Project Overview

Information Privacy and Security (IPAS)
Multi-year, multi-phase effort with University-wide scope

– Phase I: Evaluate PCI-DSS systems and networks
– Phase II: Focus on privacy and security practices
Project Team

• Designated Staff
  – Project Manager
  – Sr. Network Analyst
  – Technical Coordinator

• Administration
  – Security Operations and Services Sr. Director
  – Chief Privacy Officer
IPAS Sponsorship & Leadership

• Sponsorship
  – Executive VP and Provost
  – Sr. VP for Finance and Business

• Oversight
  – Vice Provost for Information Technology Services
  – University Controller
PCI DSS

Optional? No way!
History of PCI DSS

• Five major card brands joined forces
• 12 strict security requirements
  – 2005, PCI DSS v1.0
  – 2006, PCI DSS v1.1
  – 2008, SAQ A, B, C, D, E
• Ongoing efforts
  – Annual SAQ
  – Compliance can be broken in 1 minute
Audience Assessment

Who has already gone through PCI DSS validation?
IPAS Approach

Challenges, Misconceptions and Lessons Learned
Education for IPAS Team

• Educate Yourself First
  – Treasury Institute's PCI DSS Conference
  – EDUCAUSE Security Conference
  – Joined PCI SSC
  – VISA and MasterCard training
  – Benchmark with other institutions
Understanding of PCI DSS

• Navigating PCI DSS, *Understanding the Intent of the Requirement*
• Qualified Security Assessor (QSA)
• Working Group and Subcommittees
  – University-wide Participation
• Help others Understand
Card Processing Assessment

• Controller Office
  – Merchant IDs

• Search for Payment Applications
  – Clubs, associations
  – Seasonal sales
  – Non-credit courses & seminars

• Word of Mouth
Qualified Security Assessor

1. Provides guidance and interpretation of the DSS
2. Online Portal
3. External Scans
4. Policies
5. Compliance Validation
Check the Source

• QSA Challenges
  – Verify with the DSS & SAP
  – PCI FAQ

• Acquiring Bank Miscommunication
  – Merchant level
  – Sales vs. Technical reps

• Card Brands - always correct
Raising Awareness

• Deans, Chancellors, VPs
• Designated IT, Admin, Financial Staff
• Training Offerings
  – Classroom (mandatory)
  – Online
  – On-demand
  – Document attendance
  – Enable information dispersion
• Funding Strategies
Misconceptions

• Scope
  – PCI DSS applies to Cardholder Data Environment (CDE)
• Use of dial-up swipe terminals
• Need for software updates and sanitization of older versions
• Network segmentation
• Truncated card numbers
Centralized Services

• Benefits
  – Limits scope
  – Smaller administrative cost
• eCommerce solutions in-house
• Firewall services
• Future centralized services
IPAS Consulting Services

- Remediation Plans
- Network Diagrams
- Reference Architecture
  - Segmentation outline
- Online Portal (QSA)
Policies

1. QSA Provided
   - Comprehensive
   - Adapted to local practices

2. Specific to department/area
   - General best practices
   - Integrate with network security policies
Compliance Validation

• Validation Timeline
  – Firm dates
  – Extension requests

• Online Portal
  – IP addressing schemes
  – External scans
  – Self Assessment Questionnaire (SAQ)
• v1.1
Lessons Learned Summary

1. Obtain high level institutional support
2. Engage QSA if necessary
3. Train everyone involved in PCI
4. Be available for consulting
   • Scope creep
5. Consider centralized services
6. Share the knowledge
Question & Answer Session

Questions?

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