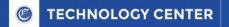


CALIFORNIA COMMUNITY COLLEGES

## Data Security Spam Filter Web Service

Works





# CCCApply

#### **Online Application for Admission**





#### Welcome

- CCC Data Security
  - Overall Problems
  - Efforts of the Information Security Center
- Security of OpenCCC & CCCApply
- Fraudulent Applications in CCCApply
  - Issue & Proposed Solutions
  - Research Study & Outcomes
  - Short-term & Long-term Development
  - College Participation
  - Development Timeline & Release
  - Future Enhancements



Breaches - expensive and embarrassing \$5.5 Million - Average cost of breach

\$194 - Average cost per record compromised

7+ CCC breaches since 2017

As financial institutions CCC's are subject to

Gramm-Leach-Bliley Act = NIST level security

DOE Dear Colleague Letters GEN-15-18, GEN-16-12



### 2017 Survey

**TECHNOLOGY CENTER** 

- 75% of California Community Colleges have no dedicated IT Security Staff.
- 60% have no Security Awareness Programs.
- 60% of Colleges ranked their Information security program as just starting out.



### CCC's are Vulnerable

- 25 College Security Assessments
- 23 Colleges penetrated common methods
  - Root level domain Access
  - Passwords compromised including CTO and President's
  - Full Access to Student & Staff Personal Information



**TECHNOLOGY CENTER** 





## CCC Information Security Center

Offers the following services to CCC colleges

- Vulnerability Assessment
- Scanning
- Server Monitoring
- Information Security Mailing List
- Security Awareness Training
- SSL Certificates
- Central Log Analysis
- Vulnerability Management Service





#### Comprehensive Cyber Security Awareness Training for Your Staff.

#### Free - SANS Securing the Human

Can be customized for your users. Meant for non-technical users. Certification of completion when finished.





### CCCApply Security Controls

Complies With Industry Standards

To ensure the security of millions of student records containing personally identifiable information, our cloud hosting provider and our security practices and controls meet the highest industry standards.

SOC 2.0 NIST 800-171



#### **Proven Stack**

Uses open source widely adopted technology stack

- Tomcat Java Server
- Java Spring Java Framework
- Uportal Java Portal
- PostgreSQL Database

#### Reduced attack surface

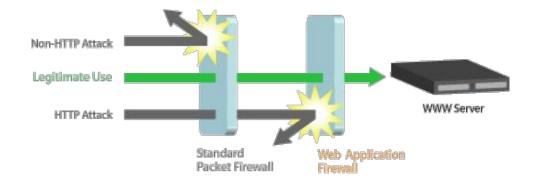
- Open ports to the internet are 80 (http) and 443 (https)
- All other ports are firewalled off
- All administrative access requires the use of a VPN with Multi-factor Authentication
- Only necessary services are installed on the servers

#### Consistency

- Saltstack configuration management product insures that servers are consistent and configured correctly
  - Ensure consistency in the environments between production, pilot, quality assurance, and continuous integration

#### Web Application Firewall

- CCCApply is surrounded by a Web Application Firewall
  - Protects against unknown vulnerabilities
  - Blocks brute force attacks
  - Provides some Denial of Service protection



#### **Static Testing**

- Code changes are peer reviewed
- Before each release, code is analyzed with a static analysis tool to ensure that no new or existing security defects are found.

#### **Dynamic Testing**

- Web Application Security Scanning
- Ensure no security vulnerabilities are found
  - Open Web Application Security Project (OWASP) TOP 10 Most Common Vulnerabilities
- Ensure no faulty logic is contained

#### Secure Environment

- Operating systems are hardened according to the Center for Internet Security (CIS) Hardening guidelines for the Operating System
- Salt ensures configurations not changed
- Patching is continually updated as new operating patches are released

#### Change Management

- Go / No Go process
  - No new changes can be pushed into Production without Exec. approval
  - No new features can be developed without approval of the steering committee
  - No major architecture changes can be made without the approval of the Architecture Committee

#### Physical Security

- Amazon Web Services
  - Holds certification of every major type, SOC, FIPS, ISO, DOD SRG, FedRamp
  - Compliant with virtually every security regulation including FERPA, GLBA, PCI, HIPPA, etc



#### Operations

#### • Infiniti Consulting Group

Customers include:

- California's Secretary of State
- California's Office of the State Treasurer
- California Franchise Tax Board
- CalTrans
- State of California Public Utilities Commission
- California Department of Consumer Affairs,
- State of California Public Employee Relations Board
- California Department of Water Resources
- Infiniti holds the following certifications:
  - ISO 20000:27001
  - ISO 9000
  - Top Secret Facilities Clearance

#### Encryption

- Personally Identifiable data is encrypted at rest.
- All data is encrypted in transit
- All computer drives are encrypted

#### **Recent Audits**

- 2017 CCC Apply tested by external 3rd Party Audit
  - No major findings
  - Small defects found and fixed.
- Current NIST 800-171 Policy & Procedures Internal Audit
  - No major findings
  - Remediation of issues in process



### **Issue: Rise in Fraudulent Applications**

Since June 2016, there's been an increase in fraud applications across system



SPAM

- As many as 12K in the same day
- Majority coming from outside the U.S.
- Many coming from outside California

#### What's their Motivation?

- Primary motivation: Financial Gain
- Seeking .edu addresses to resell and get benefits
- Getting free software licenses: Office 365
- Getting confirmations of residency
- Using residency to get California IDs
- Potential for serious security attacks



### Ways we are addressing the issue

After the first wave of fraud applications were reported in late 2016, the CCC Technology Center took immediate action to secure our system, including:

- Increased firewall protections across our local and AWS servers
- Blocked TOR and other known bad actor IP addresses
- Collect data from colleges for ongoing research project
- Research outcomes drives development of machine learning model
- Short-term: Implemented stop-gap fixes to temporarily block applications



#### **Short-Term Solutions**

We've implemented several stop-gap fixes to block fraud are being implemented in March:



- Block Apps Submitted in Under 90 Seconds = Temporarily = Error 67
- 2. Block Apps Submitted with an Email Address Associated with Multiple OpenCCC Accounts (CCCIDs) Error 50
- 3. Block Apps Submitted with an Email Address Associated with Multiple Apps Submitted in the same day - Error 51



### **Research Project**

Conducting multi-phase research project with the following objectives:

- To compile data and do exploratory data analysis
- To identify trends and patterns in the data
- To identify tools and techniques used by spammers
- To better understand the motivations by spammers
- To propose development of address fraud

#### **Development Outcome:**

- 1. Develop a machine-learning/continuous-training prediction model and
- 2. Build post-submission Spam Filter Web Service around model





**TECHNOLOGY CENTER** 

## **Spam Filter Web Service**

#### **Overview**

Post-submission web service based on machine learning model for continuous learning And retraining to grow over time

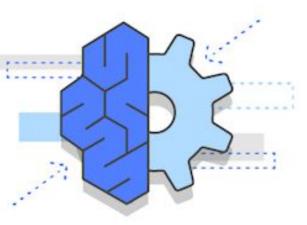
Fraud is identified and suspended in filter before it gets to Downloads Colleges monitor spam filter in the Administrator and confirm fraud Fraud apps are flagged (fraud, non-fraud, etc.) Real-time data sent back to Model for retraining Legitimate apps are sent back to CCCApply submission process (download client)

mode



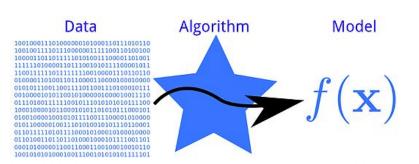
## Spam Filter Web Service Machine Learning Model

- Purpose is to *assist* colleges in making accurate and informed decisions on whether an application is fraudulent or not.
- Machine Learning model doesn't make any decisions, it just "predicts"
- Continuous learning allows the model to grow and learn based on college's determinations





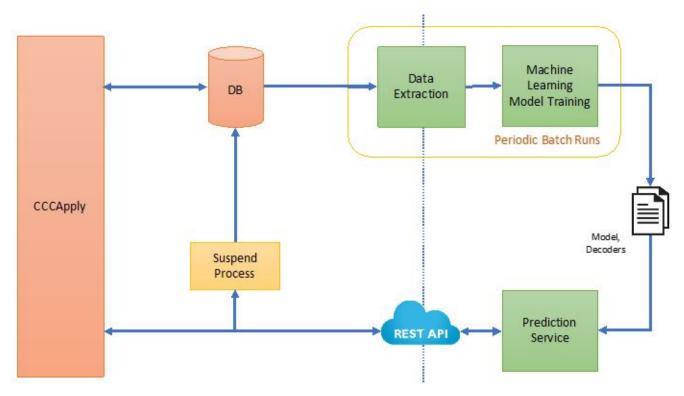
## Spam Filter Web Service Model Architecture



- Post-submission model given a training data set
- Prediction Service for individual application predictions
- REST API accesses Prediction service returns fraud status classification
- Based on determined frequency of model update
- Real-time continuous learning
- Suspend process updates fraud labels in CCCApply database



#### Machine Learning Model Architecture





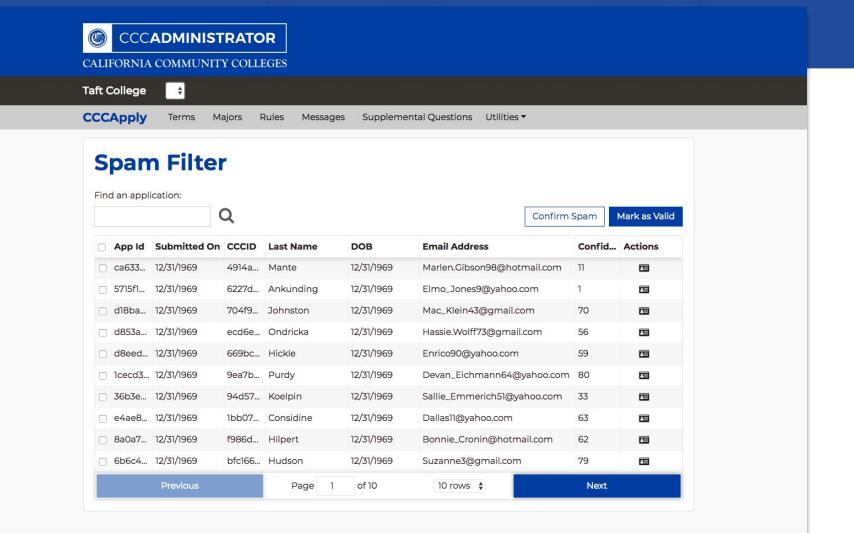
## Spam Filter Web Service Process Part 1: Application Submission Process

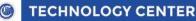
- 1. Application is submitted to Apply
- 2. Application is stored with the fraud status flag set to PENDING
- 3. Application is posted to a prediction service where model is applied
- 4. Prediction service returns a probability rating that an app is fraudulent or not.
- Based on probability rating, the fraud status flag is updated with "Checked Fraud" or "Not Checked Fraud"
- 6. Applications set with "Checked Fraud" are sent to the Suspension folder awaiting confirmation by A&R Staff



## Spam Filter Web Service Process Part 2: Spam Filter User Interface

- 1. College staff monitor suspension folder via user interface in CCCApply Administrator
- 2. Suspended applications are reviewed by college staff for confirmation
- 3. College staff make the final determination: Fraud or Not Fraud
- 4. If "Fraud" Then fraud status flag changed to "Confirmed Fraud"
- 5. If "Not Fraud" Then fraud status flag changed to "Confirmed NOT Fraud"
- 6. "Confirmed Fraud" flag calls Apply Spam API
- 7. Applications that are NOT fraud are sent immediately to the Download Client
- 8. Confirmed Fraud/NOT Fraud applications are passed back to the ML model for continuous learning





## Spam Filter Web Service Post-Submission Development

#### **Download client:**

The major change to the download client is that applications will not be available to download unless they have a fraud\_status of either LEGACY, NOT\_CHECKED, CONFIRMED\_NOT\_FRAUD or CHECKED\_NOT\_FRAUD.

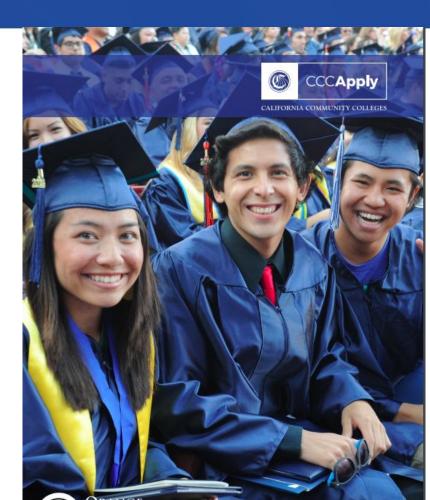
#### **Export for training**:

The Apply team will develop a new tool that can be used to export applications. This tool will dump applications into a CSV file, PGP encrypt the file and copy it to an S3 bucket for Infiniti. The file will contain application data and the fraud status for each application. Infiniti will use this file to perform ongoing training of their prediction model.



## **Pilot Colleges**

- Top 4 colleges attacked by fraud
- Data used in deep dive analysis
- Identified trends for the model
- Provide insight on motivation
- Submitting bad apps monthly
- Participating in ongoing research





### College Participation

Participation from ALL colleges is critical to success of model

Regular monitoring of spam filter Making determination of fraud status Support continuous learning of model

Understand the motivations of spammers Out for financial gain





#### **Submitting Fraud for Research**

- Must be in the required format
- Send other info in a separate file.

Item: Confirmation # of suspected bad apps. File Format: TXT File Naming Convention: CollegeMISCode\_Fraud\_mmddyy.txt

Confirmation numbers ONLY

One (1) confirmation number per line in .txt file





#### **Best Practices**

- Review onboarding processes and auto-response emails
- Educate staff to identify fraud patterns & trends
- Ensure applicants are legitimate students before issuing .edu email addresses
- Remove ways for spammers to get into our system



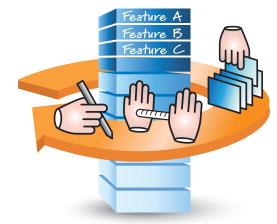


## Spam Filter Web Service Under-Development

- Final phase of web service API and prediction service
- User interface integration into Administrator
- CCCApply Administrator system upgrade
- Enhancing Download Client for fraud status flag

#### **Future Enhancements**

- Email notifications to colleges to monitor filter
- Filter interface adjustments





#### Spam Filter Web Service Release Timeline

#### Release 6.2.0 Scope

- Usually our CCCApply Annual Update
  - Spam filter web service API
  - Machine learning model
  - CCCApply Administrator Upgrade

Pilot Release - 30 Day Preview & Training - May 23 Production Release - June 23

