

OREGON

CREDIT UNIONS

August 10, 2023

Governor Tina Kotek
State of Oregon
900 Court Street, Suite 254
Salem, OR 97301

Subject: Impact to OR Credit Unions DMV/MOVEit Data Breach

Dear Governor Kotek,

Thank you for your continued support of Oregon credit unions. We appreciate you signing into law several of our priority bills including HB3200, an update to the Oregon Credit Union Act, SB3, our bill to bring financial education back to the Oregon curriculum, and SB619 a broad change to improve Oregon's data breach laws, among many other issues this past session. One issue that continues to impact cooperative credit unions in Oregon and around the nation is fraud and identity theft.

As you know, this past June, MOVEit notified the State of Oregon that their Progress software used by the state DMV to transfer data files had been hacked. On Thursday, June 15, ODOT notified the public about the MOVEit breach, indicating that any Oregonian with a license, permit, or ID card should assume personal identifiable information was exposed, including but not limited to first and last names, dates of birth, physical addresses, last four of their social security number.

General Comments

We thank you for your attention to this issue. On your second full day in office you sent a [letter to all employees of the State of Oregon](#). In that letter, you thanked state employees for their service and challenged them to make things better by prioritizing customer service, creating efficiencies, improving effectiveness, and modernizing systems. You set an ambitious goal and asked

the Oregon DMV to restore Oregonians' trust in the state's ability to protect their identities and respond to critical incidents.

As this data breach continues to impact credit union members, we are asking the State of Oregon to take immediate, concrete actions to restore public perception and trust. We are recommending several actions to improve consumer data security. Those actions include:

- Providing free credit monitoring services to those impacted, as early detection can prevent further damage and allows victims to take necessary action promptly.
- Improve communication by providing a dedicated number for Oregonians to call regarding the breach. This call center should be staffed with knowledgeable individuals trained to assist with identity theft concerns. They should also be empowered to track down answers and follow up with concerned parties to provide solutions.
- It is critically important that the Oregon DMV be transparent and provide accurate information rather than minimizing or misleading Oregonians on the seriousness of the data breach.

Credit Union Concerns

Access to Financial Information - Data breaches of personally identifiable information have the potential to cause significant financial disruptions and harm to Oregonians. The website dedicated to the DMV/MOVEit data breach downplays this concern. Specifically, the website states that financial information was not part of any accessed file. However, it fails to inform the public that the data points that were accessed are often used by financial institutions to verify customers. In addition, there are no recommendations to update passwords and challenge questions, basic protection steps typically recommended after a breach. These simple omissions are material and significantly downplay the financial risks that Oregonians are facing.

For example, many financial institutions use data points such as date of birth or address as a primary point of member/customer verification, and the last four of a social security number being used as a secondary verification tool. Based on this breach, credit unions will need to take several steps to minimize vulnerabilities caused by the Oregon DMV/MOVEit breach, which may take time and resources to implement leaving Oregonians exposed.

Lack of Communication - Credit unions have contacted the DMV inquiring about whether additional datapoints may have been exposed in the breach. The interactions have been less than satisfactory.

Examples include:

- Inability to speak to a representative when using the number provided on the data breach webpage.
- Extreme wait times to get ahold of someone when using the number provided on the data breach web page or other DMV numbers.
- Vague or apathetic answers such as, “assume any information that the DMV has collected on you was accessed,” or “that is not my department,” and “I don’t know who would be able to assist.”

Financial institutions have valid concerns about the potential exposure of data that the DMV has. As an example, credit unions might use place of birth (city and state) and/or mothers’ maiden name as a means to verify member authenticity. These are included on birth certificates which are used by the DMV to prove identity. Credit unions expect and deserve a definitive response to their inquiries. We want to know if that information was accessed before expending time and resources to make changes.

Early Detection - Credit monitoring services can help Oregonians with early detection of identity theft, alert them to unauthorized attempts to access their financial information, or open accounts using their personal data. Louisiana’s Office of Motor Vehicles was also part of the MOVEit data breach. They responded by offering free credit monitoring. A step that Oregon has yet to take.

In summary, our recommendations include:

1. Retain and offer free credit monitoring services.
2. Open a call center with trained staff.
3. Update the website:
 - Inform Oregonians of all data fields that cyber attackers may have accessed.
 - Accurately reflect risks specifically around financial information.
 - Add Cyber-hygiene recommendations such as changing passwords, updating challenge questions used to access online portals, and turn on multifactor authentication, if able.

Thank you for the opportunity to provide this background. We ask that you personally work with the Oregon Department of Transportation to ensure

that they meet the challenge by prioritizing customer service and offering tangible solutions to victims.

Respectfully,

Pam Leavitt

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