

Key Trends Driving Fraud Transformation in 2021 and Beyond

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IMPACT POINTS

- Trends in fraud are often turbulent and inconsistently distributed across financial
 institutions in the industry. But despite environmental conditions that have
 amplified the variability in loss patterns, some notable themes have persisted and
 provide useful insight into what to expect when markets enter a post-pandemic
 recovery period.
- Overall patterns in the growth of fraud losses for 2020 reflect a more volatile distribution relative to those from 2019. While most FIs report net increases in fraud losses over 2019, fewer FIs are reporting flat rates, and more FIs are reporting decreases in fraud losses.
- Most of the conventional forms of fraud (e.g., card fraud and check fraud) reflect a
 general trend toward slowing rates of growth in 2020 because fraudsters are
 targeting government stimulus payments more than banks and their clients during
 the pandemic period.
- Growth rates in application fraud, mule activity, first-party fraud, synthetic identity
 fraud, and account takeover (ATO) attacks (particularly automated ATO attacks) are
 the exception to this slow-growth trend. Fraudsters have leveraged vast inventories
 of compromised identities to expand their mule networks in an effort to launder the
 proceeds of intercepted stimulus payments and to commit first-party fraud and
 synthetic identity fraud.
- As stimulus programs peter out and the effects of the economic downturn resulting from the pandemic begin to ripple through the industry, it's reasonable to expect a shift in priorities among the investments being considered by fraud executives.
- The emphasis on investments to plug gaps in application fraud and ATO control frameworks will continue to remain strong, particularly in the digital and contact center channels. These investments are more likely to survive tightening budget restrictions primarily because they directly support strategic goals to reduce fraud losses, improve acquisition rates, and improve the efficiency and effectiveness of service delivery.

INTRODUCTION

Fighting fraud is a challenge on a good day, and—given the pace of change in the financial services industry, the increasing pressures to reduce losses without proportionate increases in investment or operating budgets, the frustrating rate of growth in the volume of financial crime, and fraudsters' persistent cleverness—recent history hasn't seen too many good days. The economic instability, social unrest, and operational disruptions stemming from the pandemic have not improved conditions. However, it's worth noting that the impacts of the pandemic have not unfolded in the way that many would have guessed. Just as it was difficult to predict how the pandemic would impact fraud, it's equally difficult to predict how the ongoing recovery and the long road back to "normal" will impact fraud.

Despite the exceptionally dynamic nature of the market and its volatility in the last year, a number of fairly high-level trends provide some insight for fraud executives tasked with preparing for 2021 and beyond. This report examines the well-established market trends that are likely to persist as well as some environmental conditions that are likely to accelerate fraud attacks stemming from identity theft. The market for managing fraud has always been a highly complex system with incredibly sophisticated and fluid dynamics. In times of crisis, such as they are in 2020, and during times of recovery, such as they may be in 2021, the market will only get more complex, more sophisticated, and more fluid.

METHODOLOGY

Aite Group surveyed 47 U.S. financial crimes professionals who attended Aite Group's Financial Crime Forum in September 2020 to better understand the current and future environment for fraud trends. With one exception (Thailand), these financial institutions are in North America, while the nature of the participating fintech firm allows it to cover a wider geographic area.

For comparisons of data between 2019 and 2020, Aite Group conducted statistical tests of significance at the 90% level of confidence.

Given the size and structure of the research sample, the data provide a directional indication of conditions in the market.

THE MARKET

If 2020 was a surprise for many fraud executives, it's likely that 2021 will be a bit more predictable as consumers and businesses adapt to post-pandemic patterns and the economy begins to stabilize and resume more stable, if potentially sluggish, growth trajectories. Many trends will conform with larger, macro-level patterns that have been exerting pressure on the market for years, but others can be expected to either accelerate or decelerate on the whole. Table A highlights some trends likely to play a role in influencing macro-level patterns in the market as the world slowly adjusts to the post-pandemic era in 2021 and beyond.

Table A: The Market

Market trends	Market implications
Government stimulus payments will ebb, and the fraudsters will shift their focus back to targeting security vulnerabilities at banks and their clients.	Conventional fraud attacks (e.g., card fraud, check fraud, and other forms of payment fraud) will resume pre-pandemic rates and patterns, and may quickly surpass pre-pandemic levels.
Fraudsters will continue to double down on identity-related fraud as they return to the practice of defrauding FIs and their clients.	While card and check fraud attack rates will rebound to pre-pandemic levels, application fraud attacks will continue to grow. There will likely be an acceleration in ATO attacks due partly to overflowing inventories of personally identifiable information (PII) and credentials from the surge in digital adoption in 2020.
As the payments ecosystem evolves and as banks mature their security control frameworks, fraudsters will accelerate their emphasis on attacking the end user directly.	The macro-level pattern of fraud attacks' slow migration away from the FI's security in favor of the consumer will resume as economic patterns return to pre-pandemic forms. As new payment options and usage patterns emerge, this trend will begin accelerating. FIs will be increasingly pressured to shore up proactive security precautions to help their clients identify and prevent scam attacks.
So long as the economic recovery drags on, fraud attack volume will continue to increase.	The ranks of those who commission the attacks, as well as the mules who provide logistical support, will continue to increase at the same pace, if not more quickly, as economic conditions remain suppressed. The result will be an increase in the volume of attacks in general but with a particular emphasis on the kinds of fraud that typically accompany prolonged recessions, most notably first-party fraud.

Source: Aite Group

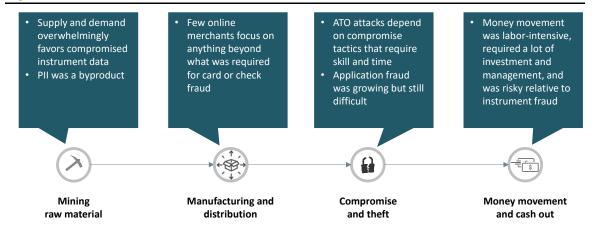
ATTACK PATTERNS SHAPING THE MARKET

Step one in predicting how market forces will impact investment trends is to lay out the foundational elements upon which those market forces are based. In that spirit, it's helpful to start by reviewing the macro-level patterns in fraud and establishing the trajectory that these market forces have been following. Once these are established, it is possible to break down each market trend in the context of recent events and determine whether those recent events have influenced (or are likely to influence) those trajectories.

MACRO-LEVEL PATTERNS AND TRAJECTORIES

It's fairly well-established that contemporary fraud trends follow trajectories that were significantly altered by the deployment of EMV. Specifically, that the deployment of EMV in the U.S. market forced the fraudsters to shift their revenue streams from those that prioritize stolen instrument data (e.g., the primary account number) to those that make efficient use of what had been, up until the mid-2010s, thought of as a byproduct of fraudsters' industrial-scale datamining operations. Prior to the deployment of EMV, that data-mining operation focused primarily on instrument data (Figure 1).

Figure 1: The Pre-EMV Fraud Value Chain



Source: Aite Group

In the post-EMV environment, fraudsters were forced to adopt tactics that could make more efficient use of the PII byproduct from their existing data-mining operations (Figure 2).

See Aite Group's report EMV: Issuance Trajectory and Impact on Account Takeover and CNP, May 2016.

^{2.} See Aite Group's report Trends in Account Takeover Fraud for 2019 and Beyond, June 2019.

PII is abundant Emphasis begins to Glut of supply helps to turn toward how to drive costs down overcome identity Online merchants are Security professionals proliferating, Financial criminals Growing inventory of specializing, diversifying, and mule accounts competing Mining Manufacturing and Compromise Money movement raw material distribution and theft and cash out

Figure 2: The Post-EMV Fraud Value Chain

Source: Aite Group

The implications of these shifts in the post-EMV environment would be a lot easier to perceive with a more robust industrywide fraud taxonomy, which has been a perennial challenge in and of itself.³ Recent efforts by the Federal Reserve to create a fraud classifier model⁴ are a welcome step in the right direction. This model segments the forensic nature of the event (i.e., who, what, and how the security compromise occurred, from the perspective of the FI seeking to classify the event) from the product that was used to facilitate it (e.g., card, check, person-to-person payment network). A similar approach was leveraged in surveying participants at Aite Group's Financial Crime Forum in September 2020, which rendered some useful insights into fraud attack trends that help to illustrate how fraud attack patterns in the post-EMV environment are shaping the market.⁵

WHAT 2020 FRAUD PATTERNS REVEAL

Most fraud executives were predicting net increases in loss in the early days of the pandemic. As Figure 3 illustrates, compared to trends gathered from the same period last year, a larger percentage of respondents are reporting decreases across the same range of fraud types in 2020 than in 2019.

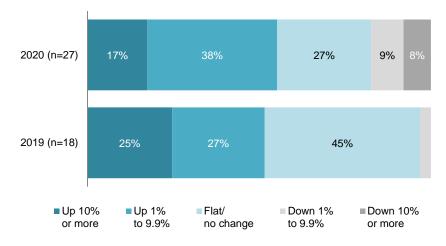
^{3.} See Aite Group's report Key Trends Driving FI Fraud Investments in 2020 and Beyond, November 2019.

^{4. &}quot;Fraud Classifier Model," Federal Reserve Fed Payments Improvement, accessed October 30, 2020, https://fedpaymentsimprovement.org/strategic-initiatives/payments-security/fraudclassifier-model/.

See Aite Group's report Aite Group's Third Annual Financial Crime Forum: Collaboration Amid Crisis, October 2020.

Figure 3: Overall Trends in Fraud Losses From 2019 to 2020

Q. Please indicate the trend associated with each type of payment fraud, comparing current YTD losses to YTD losses two years ago.

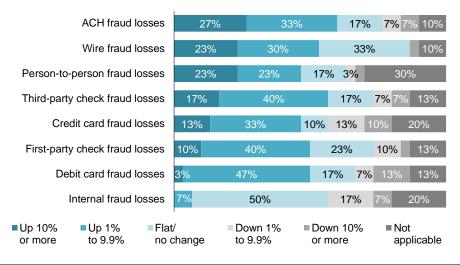


Source: Aite Group's survey of 30 financial services fraud executives, September 2019, and Aite Group's survey of 47 financial services fraud executives, September 2020

Closer inspection of losses reveals that rates of change are not evenly distributed across fraud types (Figure 4).

Figure 4: Rates of Change in Fraud Losses for 2020 by Fraud Type

Q. Please indicate the trend associated with each type of payment fraud, comparing YTD 2020 losses to YTD losses two years ago. (n=30)



Source: Aite Group's survey of 47 financial services fraud executives, September 2020

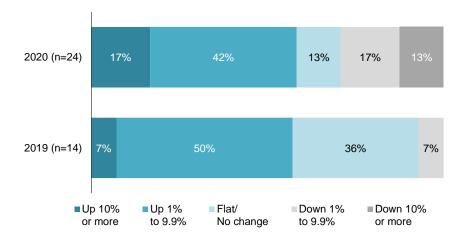
When compared to rates of change from 2019, loss rates among aggregate credit card fraud losses (Figure 5), debit card fraud losses (Figure 6), and ACH fraud losses (Figure 7) reflect a more varied range of responses in 2020. While the data fail to reflect a statistically significant shift

toward a reduction in fraud loss rates, the slight increase in the number of FIs reporting decreases in fraud loss rates in 2020 compared to 2019 helps to explain why some fraud executives have perceived that fraud losses are trending flat or even downward in 2020.

Figure 5: Rates of Change in Credit Card Fraud, 2019 and 2020

Q. Please indicate the trend associated with each type of payment fraud, comparing current YTD losses to YTD losses two years ago.

Credit card fraud losses

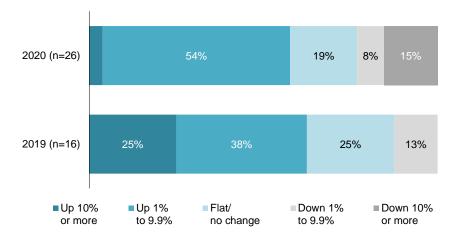


Source: Aite Group's survey of 47 financial services fraud executives, September 2020

Figure 6: Rates of Change in Debit Card Fraud, 2019 and 2020

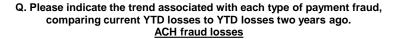
Q. Please indicate the trend associated with each type of payment fraud, comparing current YTD losses to YTD losses two years ago.

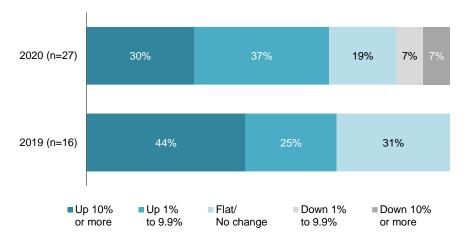
<u>Debit card fraud losses</u>



Source: Aite Group's survey of 47 financial services fraud executives, September 2020

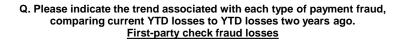
Figure 7: Rates of Change in ACH Fraud, 2019 and 2020

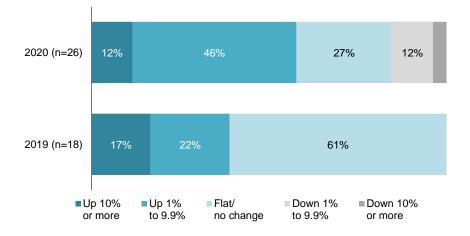




Interestingly, the fraud segment that several fraud executives perceive to be on the increase in 2020 is first-party check fraud (Figure 8). Of all of the fraud types included in this section of the survey, it is the only one among the bunch that's a direct downstream result of application fraud. First-party check fraud (also known as deposit fraud or new account fraud) involves a bad actor who uses a stolen or synthetic identity to create a demand deposit account (DDA) into which the fraudster deposits items drawn on accounts that are fictitious, closed, or otherwise incapable of funding the deposited item. If the deposit goes undetected, the bad actor will draw on the credit provided by the beneficiary bank prior to the fraudulent item returning from the bank of first deposit.

Figure 8: Rates of Change in First-Party Check Fraud, 2019 and 2020

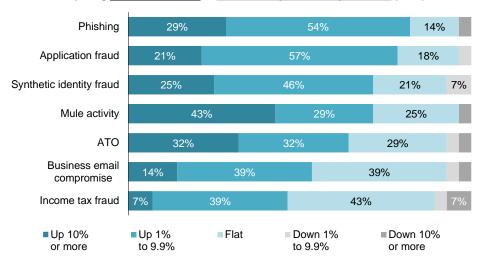




As most fraud executives know, the nature of the fraud risk is not always a direct reflection of the payment method the fraudsters use to exfiltrate the fruits of their deception. For this reason, more thoughtful approaches to fraud taxonomies (and surveys to reveal trends in fraud activity) also include a forensic examination of points of failure. The challenge, of course, is that these are not consistently tracked by all FIs, owing, again, to the lack of a more robust and unified prescription for categorizing fraud events and accounting methods. Despite this problem, and fortunately for the sake of this report, the 47 respondents (responses from the same FI were de-duped from final results) who participated in Aite Group's Financial Crime Forum survey were well enough prepared to provide estimates of the trends in forensic fraud attack patterns in 2020 compared to the pre-pandemic period (Figure 9).

Figure 9: Trends in Fraud Attack Methods in 2020 vs. Pre-Pandemic Period

Q. Please indicate the trend associated with each kind of fraud attack, comparing attack rates today to attack rates prior to the pandemic. (n=28)



Source: Aite Group's survey of 47 financial services fraud executives, September 2020

The growth rates of identity-related fraud now outstrip instrument fraud, such as card and check fraud. While those types of fraud still account for the lion's share of losses at most FIs and while they are still a top priority for fraud executives, fraud attacks that stem from the compromise and abuse of consumers' identities are among the things that keep most fraud practitioners up at night. Chief among the types of fraud that manifest from the swelling rates of compromise and abuse of consumers' identities are application fraud and ATO. Unfortunately, fraudsters are focusing more and more of their efforts on these.

APPLICATION FRAUD

As 2020 unfolded and the effects of the pandemic came to be better understood, many were surprised to see losses from instrument fraud attacks (e.g., card and check fraud) flatten or, for some FIs, even recede. Closer inspection of the trends reveals that the root cause of the flat losses in instrument fraud is less about disruptions in the fraudsters' operating model (though that surely plays a role in shaping the patterns of 2020) than it is about the fraudsters' preoccupations with intercepting government stimulus payments. To better understand the drivers behind the growth of application fraud (Figure 9), it's helpful to understand its three primary manifestations and how those types of fraud relate to the broader trends in fraud for 2020 (Table B).

^{6.} See Aite Group's report *Application Fraud: Accelerating Attacks and Compelling Investment Opportunities*, November 2020.

Table B: Primary Manifestations of Application Fraud

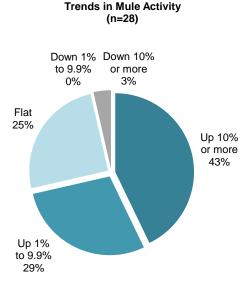
Term	Definition
First-party fraud	First-party fraud refers to any fraud committed against a financial institution or merchant by one of its own customers. The most common forms are first-party check fraud (commonly referred to as deposit fraud) and credit card bust-outs.
Mule activity	Mules are account holders who receive money into their accounts and transfer it elsewhere for a fee. Mule activity, then, is the collective amount of illegally transferred funds.
Synthetic identity fraud	A synthetic identity is not associated with an actual, real person, and fraudsters create it by using a combination of fabricated credentials. Synthetic identity fraud is when a fraudster uses such an identity to make multiple payments (usually on a line of credit) with no intention of paying it back.

Source: Aite Group

The fraud types that have conventionally garnered the greatest amount of investment dollars to stem their growth (at least relative to mule activity and synthetic identity fraud) are the most common types of first-party fraud. The reasons for this are relatively straightforward. It's fairly easy to draw a straight line from readily identifiable losses (in the form of first-party check fraud losses and credit card bust-out losses) to failures in the application fraud control framework. First-party fraud has been a staple of the fraudster's operating model for decades and remains a popular form of attack today. While some disagree, many fraud practitioners believe that attack rates in first-party fraud correlate with economic downturns. Several fraud executives interviewed for this report point to recent increases in "good client gone bad" scenarios as illustrations of this implication. An example of a "good client gone bad" in a DDA scenario is when an account holder with a well-established tenure and a positive history of account activity begins making one or more fraudulent deposits and attempts to cash out before the suspect deposit clears. This is frequently the result of the client falling on hard times economically and seeing little or no options for legitimate forms of income. Regardless, first-party fraud is a reliable source of revenue for many fraudsters. So long as it is easy and cost-effective to purchase stolen or synthetic identities from unscrupulous marketplaces on the deep and dark webs, losses from first-party fraud will remain positive and stable.

Synthetic identity fraud also has a demonstrably stable rate of growth for many of the same reasons. It's a lucrative revenue stream for the fraudsters and has multiple ways of returning value for them. Fraudsters can use the synthetic identity to commit first-party fraud or to create and manage mule accounts that they control directly. Many believe that this is one of the faster-growing uses of synthetic identities, particularly given what one fraud executive described as the "explosive growth in mule activity" that many FIs have reported in 2020 (Figure 10).

Figure 10: Rates of Change in Mule Activity 2020 vs. Pre-Pandemic Period



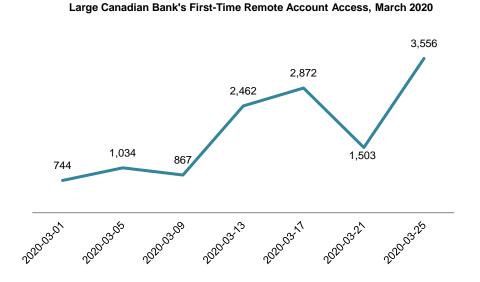
While the environmental conditions resulting from the pandemic can reasonably be considered to be "special causes" for the acceleration in application fraud and its derivative, downstream forms, it's important to remember that it was trending positively as one of the areas of greatest concern for fraud executives well prior to the events of 2020. Three noteworthy implications are associated with the long-term trend of increasing rates of application fraud:

- There are multiple (good) reasons to prioritize application fraud control investment: First-party fraud losses and improving and optimizing the application process are the most tangible business-case drivers, but synthetics and mule activity are beginning to occupy greater mindshare among those advocating for and approving investments in the transformation of application fraud controls.
- Growth rates in fraud stemming from widespread identity theft are here to stay:
 Application fraud and ATO have demonstrated that they are the fraudster's path to revenue expansion. As the fraudsters innovate and continue to scale their attacks upward, FIs would be wise to continue to prioritize investments aimed at bolstering their defenses in these areas.
- Much room for improvement remains: As details emerge about the scale of impact
 from synthetic identity fraud and mule activity, it will become painfully clear to many
 Fls just how much value there is in transforming their application fraud control
 frameworks.

ACCOUNT TAKEOVER

ATO has been an increasingly significant source of anxiety among fraud executives for years. Like application fraud, the root cause driving much of the growth has been the proliferation of the raw material that makes the fraud accessible to bad actors. The pace of data breaches that produce that raw material shows no sign of slowing and has also proved resistant to the environmental conditions that have disrupted virtually every other commercial enterprise. In fact, many fraud executives have made the argument that, if anything, the environmental conditions brought about by the pandemic will only accelerate the output of fraudsters' industrial-scale data-mining operations. Consider the substantial increases in net-new digital banking and e-commerce users, as indicated in Figure 11, which reflects a strong uptick in Canadian customers who remotely accessed their account for the first time as COVID-19 fears and shelter-in-place orders rose during March 2020.

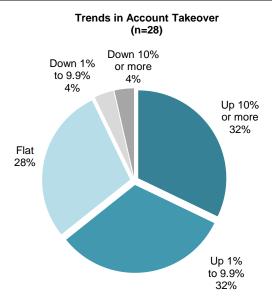
Figure 11: Impact of the Pandemic on E-Commerce Transactions



Source: BioCatch

Add to this consumers' habit of reusing credentials, the unfortunate trend among fraudsters toward automation, and the ever-evolving nature of digital-first payments platforms, and it's not hard to see why ATO has been among the top three pain points for fraud executives for several years running. As FIs and e-commerce sites have deployed more sophisticated countermeasures to detect and prevent ATO attacks, the fraudsters have adapted their tactics or innovated new ones. Social engineering is one example of a tried-and-true tactic that has enjoyed a resurgence. It's worth noting an important distinction about ATO trends. The most commonly cited forms of ATO attacks in 2020 are automated attacks, including credential stuffing, phishing/smishing, and rogue apps in app stores. These types of attacks, while common, are frequently detected and thwarted before they result in theft. Therefore, the increasing growth rates in ATO (Figure 12) are reflective of attacks as opposed to losses.

Figure 12: Rates of Change in ATO Attacks 2020 vs. Pre-Pandemic Period



In summary, application fraud and automated ATO attacks are bucking the trend among conventional types of fraud toward relatively slower growth rates. The consistently increasing growth rates in both over the last several years are tied directly to the proliferation of compromised identities and credentials that are, in turn, accelerating as a function of not only environmental conditions but also the macroeconomic shift toward digital commerce. Given these points, it's reasonable to expect that fraudsters will continue to expand their operations into application fraud and ATO in 2021. In fact, considering the likelihood that the government stimulus programs will eventually give way to organic economic growth resulting from a post-pandemic economic recovery, it's also likely that the fraudsters' attention will once again return to targeting FIs and their clients. The return of bank fraud to pre-pandemic levels of attack rates will sustain demand for stolen and synthetic identities as well as mule accounts. In addition to this, fraudsters will be seeking to replace the void in revenue left by waning stimulus programs and are as likely to fill that void with ATO attacks as they are with more conventional forms of payment fraud.

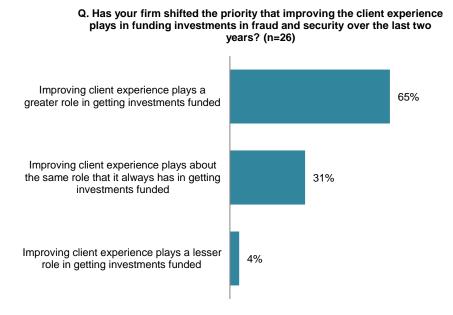
INVESTMENT DYNAMICS FOR 2021 AND BEYOND

Market forces and environmental conditions certainly influence fraud trends, and those trends in turn influence investment priorities among FIs looking to improve their capacity to manage fraud. Those fraud trends are hardly alone, however, in shaping those priorities.

THE IMPACT OF THE CLIENT EXPERIENCE

Another recurring theme that is arguably as strong, if not stronger, than the fraudster's proclivity for fraud attacks that depend on identity theft and that has been trending as consistently is the degree to which improving the client experience influences investment priorities. The majority of the 26 fraud executives who attended Aite Group's Financial Crime Forum (65%) indicate that client experience plays a greater role in getting investments funded today than ever in the past two years (Figure 13).

Figure 13: Influence of Improving Client Experience in Getting Investments Funded



Source: Aite Group's survey of 47 financial services fraud executives, September 2020

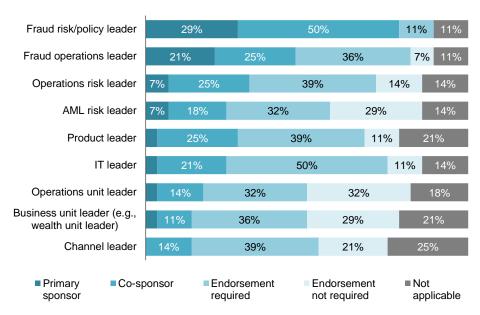
The ongoing emphasis on improving the client experience affects which transformation initiatives are prioritized. While loss prevention is the priority among fraud executives, the same perspective is not necessarily shared by the leaders of lines of business, channel- and product-strategy teams, and operations units, who are playing increasingly influential roles in securing funding for investments. Leaders of these areas are sensitive to security concerns, of course, but they prioritize investments that support their primary goals: better usability, service delivery, and revenue generation. It's exceptionally difficult to determine the degree to which this trend affects investment decisions for two reasons:

- No two FIs are organized in the same manner, nor are the roles exactly the same from one FI to the next.
- There is a lot of experimentation in organizational structures and leadership roles as
 Fls seek to find what works best for them to meet strategic objectives, which
 generally trend toward maturing digital sales and service capabilities.

Participants in Aite Group's Financial Crime Forum survey demonstrate some consensus on these leaders' roles in investment decisions. Interestingly, the roles that leaders play differ depending on the nature of the investment. However, the data are not sufficiently granular to reveal insights into the specific business unit or the precise nature of the leader's influence. Figure 14 illustrates the roles that generic classes of executives play in the funding process for identity fraud control solutions.

Figure 14: Roles That Leaders Play in Funding Decisions for Identity Fraud Controls

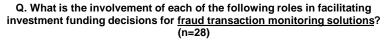
Q. What is the involvement of each of the following roles in facilitating investment funding decisions for <u>identity fraud control solutions</u> (e.g., authentication, identity verification, or orchestration hub solutions)? (n=28)

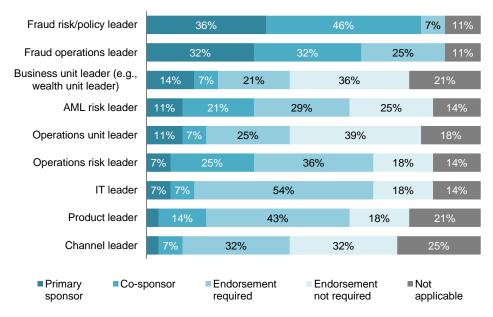


Source: Aite Group's survey of 47 financial services fraud executives, September 2020

Given the variability in organizational structures across FIs and the high degree of nuance not only in the roles but in the nature of their influence, it's difficult to draw firm conclusions from the data. When compared to how these same roles influence investments in transaction monitoring control, however, some basic insights emerge (Figure 15).

Figure 15: Roles That Leaders Play in Funding Decisions for Transaction Monitoring Controls





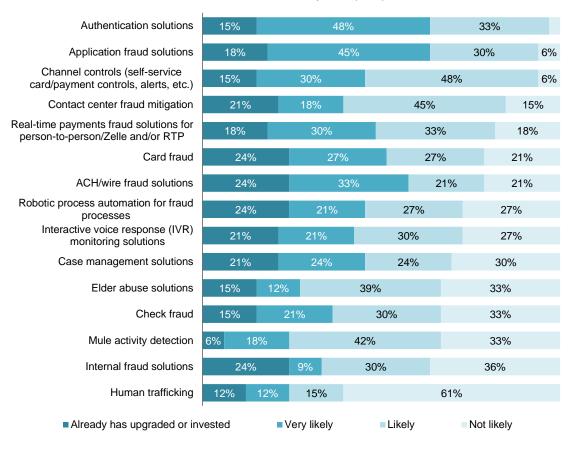
Many FIs have reported a shift toward bifurcating the roles of fraud policy leader and fraud operations leader, reflecting the trend among operational risk programs toward separating the responsibility of managing risk from that of managing an operational unit. Business unit leaders (i.e., those who manage the profit and loss for whole divisions, such as wealth and investment management, consumer banking, or small-business banking) seem to have more influence in transaction monitoring control investments. Similarly, product and channel leaders appear to have more influence over identity fraud control investments than they do over transaction monitoring control investments. Interestingly, neither seem to exercise as much influence over investment decisions as would be expected, given the increasingly influential role that improving client experience plays in security investment funding decisions as a whole.

INVESTMENT PRIORITIES

If it is not readily apparent that the client experience influences decision-makers in the investment process, it shows through a bit more clearly when examined through the lens of investment priorities. All of the areas for investment listed in Figure 16 can be said to be primarily rooted in shoring up security. Still, the top four areas (authentication solutions, application fraud solutions, channel controls, and contact center fraud mitigation) are arguably the most likely to deliver tangible improvements to the client experience as well as to security.

Figure 16: Likelihood of Transforming Capacity to Mitigate Risks in the Next Two Years

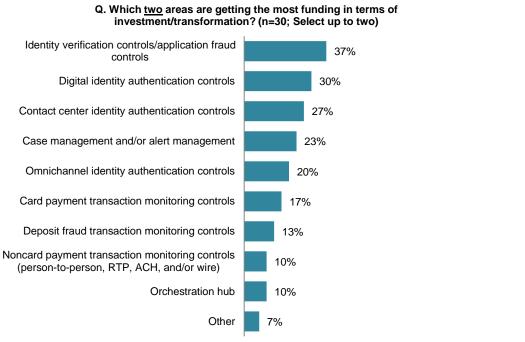
Q. How likely is your firm to engage in transforming (making substantive change vs. ongoing tweaking) its capacity to mitigate the risk of the following types of challenges in the next one to two years? (n=33)



Source: Aite Group's survey of 47 financial services fraud executives, September 2020

Viewed through the prism of which areas are getting the most funding, Figure 17 reflects the emphasis that FIs are placing on controlling fraud attacks stemming from identity theft.

Figure 17: Areas of Investment Receiving the Most Funding



While it's exceptionally challenging to predict how the economic recovery will unfold in 2021 and what impacts it has in store for fraud, many fraud executives are already planning for tighter operating and investment budgets in the coming year. This is partly the result of anticipated increases in credit charge-offs and reductions in fee revenue, but some also point to the slowing rates of growth in fraud losses as potential drivers for belt-tightening. If those predictions evolve into reality, these priorities will likely be revisited. Some fraud executives have pointed out that despite early efforts to rein in budgets, application fraud projects and authentication projects have survived. This observation underscores the relative degree of priority that these transformation initiatives have in terms of supporting more robust service delivery capabilities and the compelling business cases behind them. It's also noteworthy that investments in channel authentication controls (particularly investments for the contact center but also investments that can automate frequent service interactions, such as in IVR controls) can often reduce service delivery costs by cutting handle times or shunting more interactions to digital channels. This adds yet more credit to the notion that these areas of investment will remain firmly in place through the next year at least.

CONCLUSION

FIs:

- As government stimulus programs peter out and economic recovery gains momentum, fraudsters will return to targeting FIs and their clients.
- At best, fraudsters' return to targeting FIs and FI clients will translate to sustained growth rates in application fraud and ATO attacks. At worst, this will mean even sharper increases as fraudsters seek to fill the void in revenue left by the absence of stimulus programs.
- Be cognizant of the potential for increased scrutiny from regulators or potential increases in reputational risk in the event that investigations into waste and abuse of government stimulus programs reveal widespread abuse of application fraud controls or ATO detection controls.

Solution providers:

- Be attentive to the shifting landscape of decision-makers in investment prioritization and various stakeholders' unique needs.
- Be aware of shifting priorities. Loss avoidance still occupies the top spot for fraud executives, and it still retains the top spot for decision-makers for most kinds of investments, so your solution's impact on loss reduction will remain the most important dimension of the business case.
- As FIs expanding digital sales and service capacities experience growing pains, the
 client experience will also remain a particularly important dimension of the business
 case. This is especially true for application fraud and authentication solution
 providers, and particularly when it comes to influencing stakeholders in the fraud
 executive's orbit.
- As budgets begin to tighten in the wake of the economic disruption of 2020, be aware of increasing emphasis on how your solution can reduce costs or help to either automate pain points or drive customers to more automated channels.

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