



### **POLICY 6.035**

**4-D** I recommend that the Board adopt the proposed revised Policy 6.035, entitled "Acceptance of Credit and Debit Cards."

[Contact: Leanne Evans or Jennifer Rivera, PX 48142..]

#### **Adoption**

#### **CONSENT ITEM**

- The Board approved development of this revised Policy at the development reading on July 30, 2008.
- Section 1001.41(7), FS, permits the School Board to enter into agreements for accepting credit and debit cards payments for goods, services, tuition and fees.
- In the District's efforts to improve its services, the District desires to provide parents and employees with the ability to make certain payments online with a credit/debit card for business services such as school meals, school activity fees, after school care services and administrative matters as fingerprinting fees, teacher certification fees, adult education course registration fees and retiree insurance premium payments.
- The proposed policy would apply to all employees and work units of the District accepting credit/debit card payments on behalf of the District, consultants providing credit/debit processing activities for the District.
- The proposed policy establishes control measures for the use of credit/debit cards, by providing requirements for processing activities associated with the use of such cards by:
  - Authorizing the School District to use only a vendor awarded a contract by the School Board; and outlining requirements a vendor must meet as computer system security, connectivity security requirements, card number storage requirements, etc.
  - Requiring the vendor, employees and third parties to hold credit/debit card data in confidence and to disclose such information only for business purposes.
  - Establishing minimal standards, requirements and responsibilities for employees with access to such information and District cost centers processing such data. The Superintendent, or his designee, is further authorized to impose further standards, requirements and responsibilities in administrative procedures established to implement

this policy.

- Subjecting District employees to personnel action up to and including termination, personal responsibility for charges, and possible legal prosecution, for a failure to comply with this policy and related administrative procedures.
- Providing for the disconnection or confiscation of technology which does not apply with this policy.
- Individual cost centers of the School District will responsible for costs associated with the use of the credit/debit cards.
- The credit/debit card program will be under the supervision of the Treasury Department.
- The proposed policy has been reviewed and approved by the Audit Committee.

POLICY 6.035

**ACCEPTANCE OF CREDIT AND DEBIT CARDS**

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3 1. **Purpose**

4 The School Board recognizes the efficiency and convenience afforded the day-to-  
5 day operation of the School District, for receipt of payments and recordkeeping for  
6 certain expenses, through the use of credit and debit cards under the supervision  
7 of the treasury department. However, the School Board recognizes the need to  
8 establish control measures for the use of credit and debit cards as a method for  
9 parents and others to use to pay fees and services that the District offers and to  
10 maintain proper security over credit and debit cardholder information. Thus, this  
11 policy provides requirements and guidance for credit and debit card processing  
12 activities for the School District.

13 The School Board, therefore, authorizes the use of credit and debit card payments  
14 for collection of revenues, including but not limited to, school activity fees, after  
15 school care services and school food services meals and for the payment of certain  
16 employee administrative expenses as fingerprinting fees, teacher certification fees,  
17 District retirees' insurance premium payment, etc. Such credit and debit card use  
18 may include the payment by online/internet use.

19 2. **Scope**

20 This policy applies to:

- 21 a. All schools, departments, work units, employees, affiliates and consultants of  
22 the School District who accept credit/debit card payments for School District  
23 activities and business as provided herein.
- 24 b. All external organizations or consultants contracting with the School District to  
25 provide services for credit/debit card processing for School District activities  
26 and business as provided herein.
- 27 c. All schools, departments, work units, employees, affiliates, and consultants of  
28 the School District who provide credit/debit card processing services for third  
29 parties.

30 3. **Costs Associated with Use of Credit/Debit Cards.**

31 All costs associated with the acceptance or use of credit/debit cards shall be borne  
32 by the individual cost center. These costs shall include the transaction fee,  
33 authorization fee, interchange rate fee, charge back fee and any other direct  
34 charges associated with the acceptance of credit/debit card payments.

35 4. **Use of Awarded Vendors**

36 Only a vendor awarded a contract shall be authorized to provide credit and debit  
37 card transactions. Any and all other vendors are unauthorized to conduct such  
38 activities within the School District.

39 Any awarded vendor must provide computer system security, connectivity security  
40 requirements, credit card number storage requirements protected by encryption,  
41 hashing and/or truncation, physical security requirements for servers storing card  
42 holder information, data retention and destruction requirements, and other  
43 requirements requiring compliance with all appropriate credit and debit card  
44 security requirements.

45 5. **Standards and Guidelines**

46 It is the responsibility of all School District employees and third parties that have  
47 access to hold credit and debit cardholder data in confidence at all times.  
48 Cardholder information should be disclosed only for a required business purpose.

49 The School District shall design adequate process and procedural standards to  
50 protect credit and debit card information held and/or used in accordance with this  
51 policy. Such standards, requirements and responsibilities shall include, but not be  
52 limited to, the following:

53 a. *Permanent employees with access to credit card information must:*

54 i. Be approved by the Principal or department head and have a background  
55 check by School Police before being granted access to cardholder  
56 information. Employees with an inappropriate background will not be  
57 permitted to have access to cardholder information.

58 ii. Attend a credit and debit card information and security training session,  
59 and sign a certification form to document his or her understanding and  
60 willingness to comply with all School District's credit and debit card  
61 policies and procedures. This certification shall be maintained in the  
62 employee's personnel file.

63 iii. Keep secure and confidential all cardholder numbers and information.  
64 Credit card receipts, if any, should typically be treated the same as large  
65 sums of cash.

66 iv. Not store sensitive cardholder data, as full account number, type,  
67 expiration, and track data, in any fashion on computers or networks.

68 v. Not transmit in an insecure manner, such as by email, unsecured fax, or  
69 through District mail, credit card numbers.

- 70 vi. Maintain card information in a “secure” environment limited to only  
71 designated employees.
- 72 vii. Restrict access to credit card data and processing to appropriate and  
73 authorized employees.
- 74 viii. Report any incidents compromising cardholder data to School Police and  
75 Internal Audit.
- 76 b. Individual Cost Centers engaging in credit and debit card processing activities  
77 must:
- 78 i. Receive authorization from the Department of Treasury
- 79 ii. Ensure that all sensitive cardholder data, as credit or debit card numbers,  
80 PIN numbers, validation codes, social security numbers, etc., are  
81 protected against fraud, unauthorized use or other compromise.
- 82 iii. Restrict access cardholder information to the minimum number of people  
83 possible, including only to the appropriate personnel. These persons are  
84 defined as needing access in order to perform their day to day  
85 responsibilities. No employee may have access to cardholder information  
86 until she or he has attended the credit and debit card information and  
87 security training session and tendered written acknowledgement of  
88 receipt of this policy and related administrative procedures and  
89 guidelines.
- 90 iv. Not release credit and debit card information in any form unless there is a  
91 legitimate business purpose as provided herein.
- 92 v. Store and secure cardholder data in locked containers identified and  
93 classified as confidential in secured areas with limited access.
- 94 vi. Not store cardholder information on laptop, notebooks, or mobile  
95 computing devices at any time.
- 96 vii. Report any incidents compromising cardholder data to School Police and  
97 Internal Audit.

98 The Superintendent, or designee, is further authorized to impose further standards,  
99 requirements and responsibilities in administrative procedures and guidelines  
100 established to implement this policy.

101 6. **Compliance**

102 Failure to comply with this policy and the associated, required administrative  
103 procedures and guidelines by employees will be deemed a violation of this policy  
104 and subject to personnel action up to and including termination, personal  
105 responsibility for any and all charges, and/or possible referral to law enforcement  
106 authorities for prosecution.

107 Technology that does not comply with this policy and associated required  
108 procedures is subject to disconnection or confiscation of equipment pending review  
109 and approval of processes, procedures and equipment.

110 7. **Administrative Procedures**

111 The Superintendent, or his or her designee, shall develop administrative  
112 procedures and guidelines providing the technical details for the implementation of  
113 this policy, including the necessary credit card processing and security procedures  
114 and guidelines. This separate document shall carry the full force of this policy. A  
115 copy of the administrative procedures and shall be housed in the School Board's  
116 District Office.

117 STATUTORY AUTHORITY: Fla. Stat. §§ 1001.41((7)

118 HISTORY:    /   2008

Legal Signoff:

The Legal Department has reviewed proposed Policy 6.035 and finds it legally sufficient for development by the Board.

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Attorney

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Date