 UNIVERSITY OF OKLAHOMA  
Campus Payment Card Security  
Supplemental Requirements for Volunteers and Minors  
Norman Campus

Note: This document contains a list of requirements. Business Units/Merchants must comply with the below and any other requirements of the PCI Steering Committee. Business Units/Merchants must obtain either a separate agreement/MOU signed by the appropriate department head, or an addendum to the respect merchant’s Office of the Bursar’s Merchant’s Contract, which enumerates the Business Unit/Merchant’s acceptance of these requirements as a prerequisite for consideration by the PCI Steering Committee to permit the involvement of volunteers and/or minors in the cardholder data environment.

Requirements:

In addition to any other requirements established by the PCI Steering Committee for requesting permission for a Business Unit/Merchant to allow volunteers or minors to handle Cardholder Data or have other involvement in the Cardholder Data Environment, Business Units/Merchants:

- must ensure the requirements of the PCI DSS are applied to all University workforce positions, including those of volunteers and minors, having responsibilities or activities that include the handling of Cardholder Data or other involvement in the Cardholder Data Environment;

- must ensure the requirements of established University and Business Unit security policy, standards, and procedures for the Cardholder Data Environment regarding workforce, workforce members, positions, and roles are applied to any such workforce positions filled by volunteers and minors, except where the policy, standard, or procedure explicitly addresses employees or individuals aged 18 and above, respectively;

- must obtain background checks for all current and prospective volunteer workforce members aged 18 and above who are to be retained in, hired, appointed, transferred, or promoted into a workforce position having responsibilities or activities that include the handling of Cardholder Data or other involvement in the Cardholder Data Environment, even if not explicitly required by the PCI DSS;

- granted permission to allow volunteers and/or minors to handle Cardholder Data or have other involvement in the Cardholder Data Environment must:

  o Ensure that volunteers of any age will not serve in roles in which they have access to more than one payment card number at a time,

  o Ensure that minors, whether employee or volunteer, will not serve in roles in which they have access to more than one payment card number at a time,

  o Designate one or more persons aged 18 or above—employee or volunteer—to supervise any volunteers that handle Cardholder Data or have other involvement in the Cardholder Data Environment; the business unit is responsible for the determination, documentation, and delegation of these responsibilities as well as the determination of appropriate supervisor-supervisee ratios,

  o Ensure that the applicable requirements of the Fair Labor Standards Act (including but not limited to work hours, supervision, and recordkeeping requirements) are met for all volunteer workers and minors,

  o Ensure and document that, upon hire, appointment, transfer, or promotion and at least annually thereafter, each volunteer workforce member aged 18 and above, provides via appropriate document vetted and approved by the Office of Legal Counsel,

      ▪ signed acknowledgement that participation is in a fully volunteer capacity,

      ▪ signed attestation that the volunteer does not have a criminal history, including sex offender status,

      ▪ signed affirmation of agreement to appropriately handle cash and Cardholder Data, and

      ▪ if serving in a supervisory capacity over one or more volunteers that handle cash and Cardholder Data, signed agreement to supervise the volunteers under his or her charge such to ensure they appropriately handle cash and Cardholder Data.