

BYLAWS OF KERR ELEMENTARY PTO, INC.

ARTICLE I. NAME

The name of this organization is "Kerr Elementary PTO, Inc." The accepted abbreviation of the name is "KPTO."

ARTICLE II. PURPOSE

The KPTO is a volunteer, nonprofit parent/teacher organization. Its purpose is to support the educational process at Kerr Elementary School ("Kerr").

ARTICLE III. MEMBERSHIP

a. Qualification. Individual membership and enrollment shall be open to parents/guardians of children enrolled at Kerr, and Kerr teachers, staff, and administrators who have completed the membership application and paid annual membership dues (when applicable). Completion of the application constitutes a member's agreement to uphold the KPTO bylaws and policies and establishes an active membership.

b. Enrollment. KPTO may enroll members at any time. Membership is valid for the current school year only. Only members who have completed their annual membership application in full are eligible to vote or serve in an elected or appointed position.

c. Annual Dues. KPTO may set an annual membership fee or suggested donation amount.

d. Conflict of Interest. Any KPTO member who has any proprietary or ownership interest in any entity that does business with or contracts with the KPTO must disclose such interest in writing to the Board of the KPTO ("Board") and shall be precluded from voting on any matter related to such entity. Moreover, members with a conflict of interest may not influence or attempt to influence any decision, opinion, or vote.

e. Members may not accept gifts in connection with any work of KPTO; and may not directly or indirectly receive any monetary benefit in exchange for any decision, opinion, or vote. Additionally, volunteers may not receive anything in exchange (e.g. products, compensation, waiver of fees, etc.) for being a committee chair, assistant chair, or committee member.

f. Revocation of Membership. Membership privileges of members who violate KPTO bylaws or policies, school or district policies, local, state, or federal laws applicable to the operations of KPTO may be revoked.

ARTICLE IV. THE BOARD

a. Officers. The Board shall be comprised of five (5) elected office positions ("Officers"). Elected officers are President, Vice President of Programming, Vice President of Fundraising, Secretary and Treasurer.

b. Qualifications. Officers must be current members of the KPTO for at least 3 months. The President shall have either been on the executive board or a committee chair for at least one (1) year within the past three (3) years preceding the year of her/his nomination for office. No officer shall serve more than two consecutive terms (see terms of office below) in the same office. All board members must have clearances in accordance with the Fox Chapel Area School District for volunteering.

c. Duties. The Board shall conduct the business of KPTO in accordance with the Bylaws and policies of the KPTO. It shall form standing and special committees, present a report to the general membership at each general membership meeting, approve payment of routine bills, and approve all committee plans and budget expenditures in accordance with the Bylaws. The Board, led by the President, may utilize additional documentation such as expectation sheets, standing policies, and codes of conduct. Each year the current Board, led by the President, will discuss and agree upon how the board work is covered along with any additional working policy documentation.

The Board must submit a yearly financial report to the membership. Such report shall be based upon the Treasurer's statement of all receipts and expenditures made to the Board as outlined herein.

The Board shall review the Bylaws at least once every five (5) years to ensure that the Bylaws are current and relevant.

The board will collaborate to do the work of the KPTO. Each board member will keep the President informed on all activities in their area. An outline of each position's core responsibilities is below, but the goal of the KPTO is to accomplish the work through committees with coordinating chairs while board members serve as liaisons. Board members may also choose to chair or co-chair a committee or choose not to have a program or fundraiser due to lack of volunteer leadership or interest.

Each exiting board member shall provide the new board member all materials relating to that office and orient the new board member as to the duties of the office, prior to the start of the new term.

i. President. The president coordinates the work of the KPTO and serves as the representative and spokesperson for the KPTO. The President is responsible for the communication and coordination of the KPTO annual calendar and events with the Kerr principal. The President shall prepare the agendas for and preside at all meetings of the general membership and of the Board. The President serves as an ex officio member of all committees and will oversee the nomination committee each year—making sure that a chair is board appointed and nominating committee deadlines and procedures are upheld. The President is responsible for signing any legally binding documents and will carry a bank card and serve as a signer on the KPTO bank account.

ii. Vice President of Programming. The main areas of responsibility for the Vice President of Programming are to oversee membership, programs, and other duties as assigned by the President. This position oversees the yearly membership drive and is responsible for compiling and maintaining up to date membership information. As part of membership, this position oversees appreciation activities including teacher/staff & volunteer. The Vice President of Programming also takes a leadership role in KPTO programs by working with the program chairs as the board liaison or co/chair. Programs are defined as the enrichment activities that do not have fundraising as the main purpose. The Vice President of Programming, in the absence of the President, shall perform the duties of President.

iii. Vice President of Fundraising. This position takes a leadership role in overseeing that the fundraising needs of the KPTO are met through acting as the liaison (or co/chair) for the fundraising campaigns/events throughout the school year and also report to the general membership fundraising progress along with the need to recruit additional chairs for fundraisers or balance out the programs/expenses of the KPTO. The Vice President of Fundraising also oversees any online processes for sign ups & payment collections—this includes showing others how to set up any processes for their specific needs or choosing to maintain the online forms on their own, and do this with the assistance of the Secretary. The Vice President of Fundraising shares the responsibility of social media accounts with the Secretary.

iv. Secretary. The Secretary shall record and maintain Minutes of all board and general membership meetings and shall maintain those records along with all other appropriate corporate records in the shared team google drive. The Secretary will be the G Suite Administrator. The Secretary will create regular correspondence to the Kerr community through a newsletter (online, email, or print) as decided on in consultation with the President. The Secretary is responsible for maintaining the website calendar and other website updates. The Secretary shares the responsibility of social media accounts with the Vice President of Fundraising. The Secretary will collaborate with the Vice President of Fundraising on online forms & sign ups.

v. Treasurer. The Treasurer shall receive and maintain all corporate funds. The treasurer holds the check book and a bank card and keeps a full and accurate account of receipts and expenditures. The treasurer makes disbursements as authorized by the President, Board or membership, and makes financial reports at Board and general membership meetings as requested. The Treasurer assists the Board in preparing and proposing an annual Budget, and prepares and presents an annual report at the first general membership meeting each year along with the prior year's total income and expenditures. The annual report and all

pertinent records are to be saved on the team google drive and along with the approved annual Budget The Treasurer shall file all required tax returns and forms by their deadlines. The Treasurer, together with the President, is also responsible for ensuring that all online payment platform and merchant services account information (including but not limited to PayPal, Venmo, and the Clover platform offered through PNC Merchant Services) is kept current and reflects the currently serving Board membership, and for ensuring completion of the KPTO's annual PCI compliance certification, all as further described in Article VIII.

d. Impeachment. Any Officer not performing his/her duties to the satisfaction of the organization may be impeached from office by a two-thirds majority vote of the members present at a general membership meeting provided that at least thirty (30) days written notice of said vote shall have been given to all members.

e. Limits of Liability. Members of the Board shall not be personally liable for the debts, liabilities, or obligation of the KPTO. Board members shall be indemnified by KPTO to the fullest extent permissible under the laws of this Commonwealth. Except as may be otherwise provided under provisions of law, the members of the Board may adopt a resolution authorizing the purchase and maintenance of insurance on behalf of any agent of the corporation (including a director, officer, employee, or other agent of the Corporation) against liabilities asserted against or incurred by the agent in such capacity or arising out of the agent's status as such whether or not the Corporation would have the power to indemnify the agent against such liability under the Articles of Incorporation, these Bylaws, or provisions of law.

ARTICLE V. COMMITTEES

a. Creation and Elimination. The Board may create standing and special committees as it deems appropriate. The Board shall appoint a chairperson to serve each committee for one (1) year, beginning July 1st and ending June 30th. The Board may replace an appointed chairperson at any time, by majority decision of the Board. A standing or special committee may be eliminated from the committee list by majority decision of the Board. The Board must publish an updated list of committees, appointed committee chairs, and a calendar of event dates at the start of each new school year.

b. Committee Chairs. KPTO members in good standing can qualify for appointment to chair a committee. All committee chairpersons shall maintain a log of their committee activities and notes during their term. Each committee chair must complete an event summary that includes any pertinent instructions, notes, AND must complete the expense & revenue section in detail that includes vendor name and description of purchase. Each exiting chairperson shall provide the new chairperson or the Board all materials relating to that office and orient the new chairperson as to the duties of the office.

c. Committee Business. The president and school principal may serve on any or all committees. All committee plans and budget expenditures must be pre-approved by the board at least 30 days prior to the event. Purchase order requests must be presented to the board in writing. Committees shall adhere to the approved annual budget and must work in consultation with their Board liaison. Purchases not approved, or over budget amount not pre-approved, will not be reimbursed.

d. Any correspondence from the PTO to parents or the community must be approved by the president in coordination with the principal. All events, fundraisers, incentives and items for sale must be approved by the Board and school principal. The KPTO name and logo (when able) must be present on all correspondence and marketing.

e. All monies collected from KPTO fundraisers, sales, or events must be kept secure and must be delivered to the KPTO Treasurer securely, in person within 7 days of receipt, along with completed forms. All cash and checks must be counted by two (2) KPTO members/board officers when money is collected on the day of an event. Never leave cash, checks or change unattended.

f. All checks from fundraising partners, all invoices and original receipts for purchases must be hand-delivered to the Treasurer or mailed to the KPTO, 341 Kittanning Pike, Pittsburgh, PA 15215.

ARTICLE VI. ELECTIONS FOR BOARD OFFICERS

a. Nominating Committee. The nominating committee shall consist of three (3) members of the KPTO. Members of the nominating committee will be elected at a general membership meeting between December and February. The nominating committee shall accept all nominations of qualified candidates for any elected office and publish the nominations via email and social media in the month of March. Only a nominee who has consented to serve can be nominated.

i. Nominee. Nominee must be a member of the PTO in good standing for a minimum of 3 months and have participated in a minimum of two (2) activities within the school year.

ii. Denial of Nominee. The board and/or School Administrators has the ability to deny a nominee by a majority vote if they feel that the nominee has not demonstrated our core values (Respect, Responsibility or Integrity) through their actions.

b. Elections. Elections shall be held electronically in the month of March and close the evening before the April meeting. If there is only one candidate for each office, a voice vote may be held. An absentee ballot shall be accepted if it is delivered to a board member at least 48 hours prior to the election date and is signed by the absentee member. Elections will be decided by a majority vote.

c. Terms of Office. The term of office for the President, Secretary and Vice President of Fundraising shall be two (2) years voted in on an odd year. The term for the Vice President of Programming and Treasurer shall be two (2) years voted in on an even year.

The term of office for a committee chair is one (1) year elected by the executive board.

Each elected officer shall assume her/his duties on July 1st of the year they are elected and serve until their term ends on June 30th the year of term expiration.

d. Vacancies. Vacancies to the KPTO board are to be filled by appointments made by the current KPTO executive board. Appointments made shall go until the position would have been originally scheduled to end.

ARTICLE VII. MEETINGS

a. General Membership Meetings. There shall be at least three (3) general membership meetings each school year. Dates of the meetings shall be determined by the Board and announced at the beginning of the school year. If a scheduled meeting date must be changed, a notice of the change will be posted in the school three (3) days in advance of the new meeting date unless impossible due to inclement weather.

b. Board Meetings. The Board will meet as needed during the school year but will remain in regular communication with each other through email and phone.

c. Special Meetings. Special meetings of the general membership or Board may be called by the President or the majority of the Board, so long as the appropriate three (3) day notice has been given.

d. Voting. An absentee ballot shall be accepted if it is delivered to a board member at least 48 hours prior to the election date and is signed by the absentee member. Delivery methods include: hand delivered, placed in the secretary's PTO mail box, or text message or email from a confirmed email address or phone number directly to a board member.

e. Electronic voting. The General Membership may vote on action items electronically. The collection of those votes shall be maintained by the Secretary. Electronic voting shall close 24 hours before election/vote meeting and must be done in a way to ensure only members are voting and only once per matter.

ARTICLE VIII. FINANCIAL AND CORPORATE AFFAIRS

a. Fiscal Year. The fiscal year of the corporation shall run from July 1 through June 30.

b. Address. The business address to be printed on all checks, vendor invoices, KPTO official correspondence, and tax forms shall be: KPTO, 341 Kittanning Pike, Pittsburgh, PA 15215.

c. Signatories. The President and Treasurer shall be authorized to sign checks.

d. Budget. The Treasurer will prepare an annual Budget which must be approved by a Board majority at its August meeting, announced and submitted for a member vote at the first general membership meeting in September.

e. Expense Approval. All KPTO expenditures are discussed at the general meetings and shall fall within the approved budget for the year.

f. Financial Accounting. The Treasurer shall prepare and provide copies of financial reports at each Board and general membership meeting. The Treasurer must receive, secure, record, and deposit all funds into the corporate account in a timely manner. The Treasurer shall issue Board approved payments of invoices and requests for reimbursement in accordance with the member approved annual budget. The KPTO's bank account, as well as any online payment or fundraising platform (e.g., PayPal, Venmo, Zeffy) and merchant services (e.g., Clover) account used by the KPTO, shall be reconciled to the Treasurer's records on a monthly basis. Where practicable, this monthly reconciliation should be reviewed by a Board member who is not an authorized signer on the account.

The Board's primary ongoing control over KPTO disbursements shall be its monthly review of a budget-to-actual report prepared by the Treasurer, comparing actual income and expenses to the member-approved annual budget by committee and category, complemented by the annual audit of expenditures described in Section g. below.

The Treasurer will maintain a record of budgeted and actual income and expenses by committee and budget category. The Treasurer will request an annual report from any committee earning and spending "reward dollars" or "reward points" from fundraising partners. At the close of the fiscal year, the Treasurer shall provide the Board with an annual report on the Budget that includes all income and expenses by committees.

The Treasurer will retain and keep secure all financial records (electronic or physical), including but not limited to receipts, invoices, financial forms, financial reports and bank statements during the term of office. The Treasurer will make all records available to the Board upon request and surrender all records to the Board at the end of the term.

g. Audit. The Treasurer shall request volunteers to form an annual audit committee and will make all financial records available to the committee. The committee must be comprised of three people. The audit must be conducted annually and final paperwork submitted to the Fox Chapel Area School District by the start of the new school year. The annual audit shall include a reconciliation of the KPTO's bank account together with all online payment platform (e.g., PayPal, Venmo) and merchant services (e.g., Clover) account statements for the audit period.

h. Tax Filing. The Treasurer shall prepare and file the applicable IRS 990-EZ by November 15 of each year, in accordance with IRS deadlines. In the event that November 15 falls on a weekend or federal holiday, the return must be filed on the following business day. The Treasurer shall report to the Board and the General Membership when the tax returns have been filed with the IRS and again in January when they have been accepted by the IRS.

i. Corporate Records. All corporate records including Articles of Incorporation, Bylaws, all Form 990s, meeting minutes, and any other historical information will be housed digitally on the KPTO drive. No KPTO officer or member will be permitted to remove records, though copies of any public records may be provided on written request.

j. Reimbursements. All reimbursements must be submitted with a valid receipt. The Reimbursement form can be found on our website at Kerrpto.org under the Docs and Forms tab. In order to be prepared for our audit and

follow the IRS requirements, please submit the reimbursement form within 60 days of the receipt. Please cash your reimbursement check in a timely manner.

k. Accounting Software. The Treasurer will provide the President and a member of the Audit Committee access to view Quickbooks.

l. Electronic Payment Platforms. In addition to the KPTO's corporate bank account, the KPTO may utilize additional financial tools and online payment platforms, including but not limited to PayPal, Venmo, Clover and Zeffy, to facilitate the collection of dues, donations, and fundraising proceeds. The President and Treasurer shall be jointly responsible for ensuring that all account contact information (including linked email addresses, phone numbers, and bank account details) for these platforms is kept current and reflects the currently serving Board membership at all times, and for promptly updating such information upon any change in Board composition.

m. Merchant Card Services and PCI Compliance. The KPTO may accept credit and debit card payments through the Clover payment platform, offered through PNC Merchant Services, including via secure payment links posted on the KPTO website and through in-person "tap to pay" transactions at KPTO events held at Kerr Elementary School. The President and Treasurer shall be jointly responsible for ensuring that the KPTO completes an annual Payment Card Industry Data Security Standard (PCI DSS) compliance certification through the Clover compliance/audit tool, or any successor compliance tool designated by the KPTO's merchant services provider, and for maintaining documentation of such certification with the KPTO's financial records.

n. Information Security Policy. The KPTO has adopted an Information Security Policy governing the security of financial data, payment card information, and electronic records, which is incorporated into these Bylaws by reference and maintained as Appendix A to these Bylaws and with the KPTO's corporate records in accordance with Section i. above. The Board shall review the Information Security Policy at least annually, and upon any change in payment processing or merchant services vendor, to ensure it remains current and continues to support the KPTO's PCI compliance obligations.

o. Approval Threshold for Significant Expenditures. Any single KPTO expenditure in excess of \$500, regardless of payment method (check, debit card, credit card, Bill Pay, or an electronic payment platform such as PayPal, Venmo, or Clover), shall require documented approval by two Board members (typically the President and Treasurer) before payment is made. For expenditures of \$500 or less, the Treasurer may initiate payment individually — including through the KPTO's PNC bank Bill Pay service — without prior co-approval, provided the expenditure is supported by adequate documentation (e.g., an invoice, receipt) establishing it as a valid KPTO expense within the approved budget, which documentation shall be retained with the KPTO's financial records for review under Section f. and the annual audit under Section g. No KPTO debit card shall be used for cash withdrawals or cash-back transactions at point-of-sale.

p. Prohibition on Personal Accounts. KPTO funds shall not be deposited into, transferred through, or held in the personal bank account, PayPal account, Venmo account, or other personal payment platform account of any officer, committee chair, or member. All KPTO online payment platform and merchant services accounts shall be established and maintained in the KPTO's name and under the KPTO's Employer Identification Number (EIN), and not in the name or under the personal information of any individual officer.

q. Account Access and Offboarding. Access to the KPTO's online payment platforms, merchant services accounts, and accounting software shall be limited to currently serving Board members who need such access to fulfill their duties. Upon an officer's departure from the Board, whether at the end of a term, by resignation, or by removal, the incoming (or remaining) Treasurer and President shall promptly remove that individual's access and update all signature cards login credentials, authorized users, and linked contact information for each such account.

r. Insurance and Bonding. The Board shall maintain fidelity bond (crime/employee dishonesty) coverage, general liability insurance, and Directors & Officers (D&O) liability insurance sufficient to protect KPTO funds — including funds held or processed through online payment platforms and merchant services accounts — against loss due to theft, fraud, or dishonesty by any officer, volunteer, or other person authorized to handle KPTO funds, and to protect KPTO's officers and directors against liability arising from their service to KPTO.

The Board shall review coverage amounts periodically as KPTO's revenues and electronic payment activity grow.

ARTICLE IX. AMENDING BYLAWS

a. Notice. Any proposal to amend the Bylaws shall be made in writing. Said writing shall be made available to the Board. If two (2) or more members of the Board approve the proposed amendment(s) for a vote by the general membership, the proposed amendment(s) shall be presented to the general membership at least three (3) days prior to the general membership meeting at which the proposal shall be voted on. Bylaws may be amended by electronic vote.

b. Voting. Proposed Bylaws and/or proposed amendments to the Bylaws submitted to the general membership as described above shall be adopted upon a two-thirds vote of the members in attendance at a general membership meeting or by electronic vote.

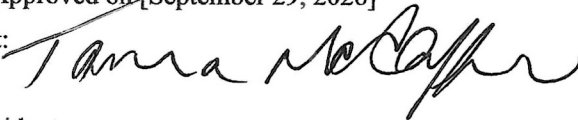
ARTICLE X. DISSOLUTION

a. Voting. The KPTO shall be dissolved upon a three-quarters vote of the members present at a general membership meeting provided that at least thirty (30) days written notice of said vote shall have been given to all members.

b. Assets. Upon dissolution, assets of KPTO shall inure and be transferred to a qualified, nonprofit successor organization of KPTO, or, if none exists, to the Fox Chapel Area School District for the benefit of the students of Kerr Elementary School.

Bylaws Approved on [September 29, 2026]

President:



Vice President:



Principal:



APPENDIX A — INFORMATION SECURITY POLICY (INCORPORATED BY REFERENCE)

The KPTO's Information Security Policy is adopted and maintained by the Board as a separate governing document supporting the KPTO's Payment Card Industry (PCI) compliance obligations described in Article VIII of these Bylaws. The current version of the Information Security Policy is maintained on the KPTO's corporate records drive referenced in Article VIII.i. and is incorporated into these Bylaws by this reference as if set forth in full. The Board shall review and, as needed, update the Information Security Policy at least annually, and shall ensure it is tailored to the KPTO's operations (including its volunteer, non-employee structure) prior to each annual PCI review.

Information Security & PCI Compliance Policy

Kerr Elementary PTO

Adopted: [Sept 29, 2026] | Reviewed Annually by PTO Board

1. Introduction

This policy explains how Kerr Elementary PTO (KPTO) protects cardholder (credit/debit card) information and supporting financial data, and what every officer and volunteer who handles payments must do to keep the organization compliant with the Payment Card Industry Data Security Standard (PCI DSS).

This policy applies to the KPTO President, Treasurer and any board member or committee chair (e.g., fundraising or spirit-wear coordinators) or volunteer authorized to accept, record, or reconcile payments on KPTO's behalf. Every person in one of these roles must read this document, sign the Agreement to Comply (Exhibit 1), and be re-briefed each school year at the start of their term.

2. Scope of Compliance

- KPTO does not operate its own network, servers, or website that accepts cards directly. Clover is KPTO's sole payment processor.
- All online payments (dues, fundraiser purchases, event tickets) are collected through Clover Hosted Checkout, Clover's hosted/redirect payment page — KPTO's devices never see or store the full card number.
- All in-person payments (school events, book fairs, spirit-wear sales) are collected using Clover Go, a PCI-validated mobile card reader paired with a phone or tablet, and/or a Clover countertop terminal, both provided under KPTO's Clover merchant account.
- The Treasurer manages KPTO's account, reporting, and settings through the Clover Dashboard.
- Because cardholder data is never stored, processed, or transmitted on a PTO-owned system, KPTO expects to qualify for a reduced PCI DSS Self-Assessment Questionnaire (SAQ A for the fully outsourced Clover Hosted Checkout, SAQ B-IP for Clover Go / countertop terminal use). The Treasurer is responsible for confirming the correct SAQ type annually with Clover/KPTO's acquiring bank (PNC) and completing it.
- This policy does not attempt to cover firewall management, server hardening, custom software development, or penetration testing — those are Clover's responsibility as KPTO's PCI DSS-validated service provider. Section 17 lists each of those standard PCI DSS program areas by name and marks them Not Applicable to KPTO.

3. Information Security Policy

KPTO handles limited cardholder information as part of collecting dues, fundraiser payments, and event fees. This information must be safeguarded to protect family privacy, comply with PCI DSS, and protect KPTO's ability to keep accepting card payments.

Anyone handling payments on behalf of KPTO must:

- Handle all payment and account information according to its sensitivity, as described in this policy.
- Never use personal devices, email, text messages, or apps like WhatsApp/Signal/Messenger to send or receive full card numbers, expiration dates, or security codes.
- Never write down or photograph a full card number for any reason.
- Keep Clover terminals, laptops, and any device used for PTO payments secured and never left unattended while logged in.

- Get board approval before adding any new payment tool, app, or vendor that will touch PTO funds or family payment information.
- Report any lost device, suspected fraud, or unusual account activity to the Treasurer and PTO President immediately — do not wait for the next meeting.
- Keep personal login credentials for the Clover Dashboard and QuickBooks Online confidential and never shared between board members.

4. Acceptable Use of PTO Payment Tools

- Payment tools (Clover Dashboard, Clover Hosted Checkout, Clover Go, QuickBooks Online) are to be used only for authorized PTO business.
- Devices used to access PTO payment accounts should be password- or PIN-protected and set to auto-lock when idle.
- Only the Treasurer or President may request new hardware, features, or integrations from Clover via the PNC Merchant Services team.
- Anyone unsure whether a use is appropriate should ask the Treasurer or PTO President before proceeding.

5. Volunteer Accountability

Any officer or volunteer who fails to follow this policy — for example, by texting a card number, sharing a login, or storing card data — may be removed from a financial role by board vote. Good intentions or unfamiliarity with the policy are not an excuse; this is why the annual sign-off in Exhibit 1 matters. Executed copies of the Agreement by board members and volunteers will be stored and maintained in the KPTO Treasurer shared drive with other PCI Compliance annual documentation.

6. Cardholder Data

KPTO must never store, in any form (paper, email, spreadsheet, phone notes, photos):

- The full contents of a card's magnetic stripe or chip data.
- The 3- or 4-digit card security code (CVV2/CVC2/CID).
- A PIN or PIN block.
- A full, un-masked card number, once a transaction is complete.

If a paper order form or sign-up sheet accidentally collects a full card number, it must be redacted (all but the last 4 digits blacked out) or shredded immediately — never filed, scanned, or emailed.

7. Access to Payment Information

- Access to the Clover Dashboard and QuickBooks Online is limited to the Treasurer and any board-approved user (e.g. Assistant Treasurer role).
- Access is granted based on the officer's role and removed the same week they leave that role or leave the board.
- Reports or exports that include cardholder data must show at most the first 6 and last 4 digits of a card number — never the full number.
- No other volunteer, committee chair, or parent has a business need to view cardholder data and should not be given access.
- The Treasurer maintains the list of approved third-party payment providers (Exhibit 2) and confirms each one's current PCI DSS validation status at least once a year.

8. Physical Security of Payment Devices

- KPTO maintains a simple inventory of its Clover countertop terminal(s), Clover Go reader(s), and any other card-reading device: make/model, serial number, and current custodian (Exhibit 2).
- Terminals and Clover Go readers are visually checked before each use for signs of tampering (loose parts, unfamiliar attachments, broken seals).
- Clover Go readers are paired only with the specific phone or tablet on file for that volunteer/custodian and are re-paired only with Treasurer approval.
- When not in use, terminals and Clover Go readers are stored in a locked cabinet or the Treasurer's possession — never left in a public area of the school.
- Anyone claiming to represent Clover or the bank to "service" or "replace" a terminal or Clover Go reader must have their identity verified with the Treasurer before any device is handed over.
- Any sign of tampering, or an unfamiliar device attached to a terminal or paired with a Clover Go reader, is reported to the Treasurer and PTO President immediately and the device is taken out of service.

9. Payments in Transit

- Card numbers are never sent by email, text, or chat app — payments are collected only through a Clover countertop terminal, the Clover Go reader, or the Clover Hosted Checkout page.
- If a family needs to pay by phone, the Treasurer or Authorized Clover Employee account enters the payment directly into the Clover Dashboard's virtual terminal while on the call — the card number is never written down first.
- Physical records containing partial card information (e.g., merchant receipts) that need to move between officers are hand-delivered or mailed, not photographed and texted.

10. Record Retention & Disposal

- Paper receipts, order forms, or sign-up sheets that include any card information are shredded once they are no longer needed for reconciliation — generally within 90 days of the event.
- Digital exports from Clover Dashboard/QuickBooks that include cardholder data are deleted from any local device once reconciliation is complete; the system of record stays with Clover.
- The Treasurer does a check each spring (end of school year) to confirm no old paper or digital cardholder data has been kept beyond what's needed.

11. Security Awareness & Training

- Every incoming Treasurer, Assistant Treasurer, and any volunteer who will handle payments reads this policy and signs Exhibit 1 before taking on the role.
- The outgoing Treasurer briefs the incoming Treasurer on this policy as part of the transition process between terms.
- This policy is reviewed by the board at least once a year (recommended: first board meeting of the school year) and updated as needed.
- Board members are reminded to watch for phishing emails or texts impersonating Clover, the bank, or PTO leadership asking for login credentials or payment changes.

12. Third-Party Payment Provider (Clover)

KPTO relies on Clover, a PCI DSS-validated service provider, rather than handling card data itself. Clover is KPTO's only payment processor and covers all three of KPTO's merchant payment channels: the Clover Dashboard

(account management and reporting), Clover Hosted Checkout (online payments), and Clover Go (mobile card reader for in-person events). The Treasurer maintains the vendor record (Exhibit 2) and:

- Confirms Clover is PCI DSS compliant (Clover/Fiserv publishes current compliance status/certificates on request).
- Keeps a copy of the merchant agreement, which states Clover's responsibility for securing cardholder data it handles on KPTO's behalf across the Dashboard, Hosted Checkout, and Go.
- Re-confirms compliance status at least annually, or before adding a new Clover feature or a different payment provider.

13. Incident Response Plan

A "security incident" is anything that could put payment information or PTO funds at risk — a lost or stolen device, a suspicious charge, a phishing attempt, or an account login that doesn't look right.

If something looks wrong:

- Report it immediately to the Treasurer and PTO President — do not wait for the next meeting.
- The Treasurer and President do a quick initial check: what happened, what device or account is involved, and whether any cardholder data may have been exposed.
- If a Clover terminal, Clover Go reader, Clover Dashboard login, or QuickBooks account may be compromised, the Treasurer contacts Clover/Fiserv support right away to lock or reissue credentials and review recent transactions.
- If KPTO's bank account or merchant account appears affected, the Treasurer contacts the bank directly.
- The board is notified at the next opportunity (email or emergency call), and if any family's card data may have been exposed, the board decides on notifying affected families, guided by the processor's and bank's instructions.
- After the incident is resolved, the board reviews whether this policy needs to be updated to prevent a repeat.

Key Contacts

Role	Name	Phone / Email
PTO President	Tamra McCloeffety	(702)277-2963/ president@kerrpto.org
PTO Treasurer	Mari Vandenburg	(412)478-4369/ treasurer@kerrpto.org
Clover Support	Ryan Simpson, PNC Virtual Payment Advisor	(412)575-5535/ ryan.simpson125@pnc.com
PTO Bank / Merchant Account	Michelle Kinzel, PNC Merchant Services	(412)781-2282/ michelle.kinzel@pnc.com

14. Roles and Responsibilities

PTO President

- Serves as the first point of contact for any reported incident alongside the Treasurer.
- Ensures this policy is reviewed annually and that new officers complete Exhibit 1.

PTO Treasurer

- Owns day-to-day compliance: managing Clover Dashboard/QuickBooks access, confirming Clover's PCI DSS status, and maintaining Exhibit 2.
- Confirms the correct PCI SAQ type with the processor/bank annually and completes attestation.

- Stores and maintains copies of executed Exhibit 1 agreements in PCI compliance files in Treasurer shared drive.
- Leads the incident-response steps in Section 13 and briefs the board.

PTO Members / Committee Chairs Handling Payments

- Follow Sections 3–10 of this policy for any event or fundraiser where they collect payments.
- Report anything unusual to the Treasurer immediately.

15. User Access Management

- A new officer's access to the Clover Dashboard and QuickBooks is requested in writing (email is fine) by the outgoing Treasurer or PTO President, stating name, role, and start date.
- Access is limited to what the role needs — e.g., an event volunteer running Clover Go for one night does not need Clover Dashboard access.
- When someone leaves a financial role or the board, their access to all payment systems is removed that same week.

16. Annual Review

This policy is reviewed and, if needed, updated by KPTO board at least once per school year, or sooner if KPTO changes payment processors, adds a new payment channel or after any security incident.

17. PCI DSS Program Areas Not Applicable to KPTO

The full PCI DSS framework includes technical program areas that apply to organizations that operate their own cardholder data environment — their own network, servers, and custom-built applications. KPTO's only merchant payment channels are Clover Dashboard, Clover Hosted Checkout, and Clover Go, all operated and secured by Clover/Fiserv as a PCI DSS-validated service provider. The subheadings below are carried forward from the standard PCI DSS policy structure for completeness and audit traceability; each is marked Not Applicable to KPTO, with the reason why.

Network Security (Firewalls & Router Configuration)

Not Applicable to KPTO. KPTO owns no network, firewall, or router infrastructure; all payment traffic occurs within Clover's PCI DSS-validated infrastructure.

System Hardening & Server-Level Password Policy

Not Applicable to KPTO. KPTO owns, configures, and administers no servers or system components that store, process, or transmit cardholder data. Password requirements for PTO officers using the Clover Dashboard are covered under Section 7 (Access to Payment Information) instead.

Anti-Virus Policy

Not Applicable to KPTO. KPTO operates no servers or cardholder data environment requiring anti-virus deployment or management.

Patch Management Policy

Not Applicable to KPTO. No PTO-owned systems, servers, or software require security patching; Clover is responsible for patching its own platform.

Remote Access Policy

Not Applicable to KPTO. KPTO has no internal network or systems for volunteers to remotely access; all access is through the web-based Clover Dashboard, covered under Section 7.

System Administration Access Policy

Not Applicable to KPTO. KPTO has no system administrators or administrative network access to manage; Clover administers its own platform infrastructure.

Vulnerability Management Policy (Internal & External Scanning)

Not Applicable to KPTO. Quarterly internal/external vulnerability scanning applies to organizations with their own network segments and IP address ranges; Clover, as KPTO's PCI DSS-validated service provider, is responsible for vulnerability scanning of its own platform.

Configuration Standards

Not Applicable to KPTO. KPTO has no network devices, servers, or systems requiring a documented configuration standard.

Change Control Process

Not Applicable to KPTO. KPTO does not develop, configure, or maintain any information system subject to a formal change control process; changes to the Clover platform itself are managed by Clover.

Audit and Log Review (Network / Database / IDS Logs)

Not Applicable to KPTO. KPTO has no servers, databases, firewalls, or intrusion detection systems generating logs to review; transaction-level activity is monitored through Clover Dashboard reporting instead.

Secure Application Development

Not Applicable to KPTO. KPTO does not develop or maintain any software application that stores, processes, or transmits cardholder data.

Penetration Testing Methodology

Not Applicable to KPTO. Penetration testing applies to an organization's own cardholder data environment (network and applications); KPTO has none. Clover is responsible for penetration testing of its own platform as part of its PCI DSS validation.

Wireless Policy

Not Applicable to KPTO. KPTO does not operate a wireless network. Clover Go's Bluetooth pairing to an approved phone or tablet is addressed under Section 8 (Physical Security of Payment Devices), not as a network wireless policy.

Encryption Key Management Policy

Not Applicable to KPTO. KPTO does not generate, store, or manage encryption keys; encryption of cardholder data in the Clover terminal, Clover Go reader, and Clover Hosted Checkout is managed entirely within Clover's PCI DSS-validated environment.

eCommerce Configuration and Hardening Policy

Not Applicable to KPTO. KPTO does not operate, configure, or host its own eCommerce server, redirect, or iFrame integration; Clover Hosted Checkout is a fully outsourced, Clover-hosted payment page.

Exhibit 1 — Agreement to Comply

I have read and understand the Kerr Elementary PTO Information Security & PCI Compliance Policy. I agree to follow it while I hold a financial or payment-handling role with the PTO, to protect any family or payment information I encounter, and to promptly report any lost device, suspicious activity, or possible policy violation to the PTO Treasurer and PTO President.

I understand that not following this policy may result in my removal from a financial role by board vote.

Name (printed): _____

Role: _____

Signature: _____ Date: _____

Exhibit 2 — Devices & Third-Party Payment Provider

Approved Payment Devices

Device	Make/Model	Serial #	Custodian
None currently leased/purchased from Clover			

Third-Party Payment Service Provider

Provider	Service Provided	PCI DSS Compliant? (Y/N)	Last Verified
Clover (Fiserv)	Clover Dashboard — account management & reporting	Y	8/30/2026
Clover (Fiserv)	Clover Hosted Checkout — online payments		
Clover (Fiserv)	Clover Go — mobile card reader, in-person payments		