

University Operations – Office of Information Technology

# Cellular Telephones and Services

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**History:** This publication revises and replaces UGS Policy 240-080-040 Cellular Telephone Guidelines. It was adopted by the EWU Board of Trustees on January 29, 2010 and is effective as of that date.

**Summary:** This policy prescribes university standards for acquisition, use, and accounting for cellular telephones and related equipment.

**Applicability:** This policy applies to all university employees, faculty, and staff.

**Proponent:** The proponent of this policy is the Chief Information Officer.

**Authority:** The authority for establishment and modification of this policy is the EWU Board of Trustees (BOT).

**Delegation:** The Board of Trustees delegates authority for modification of appendices to this policy to the Chief Information Officer.

**Review:** This policy will be reviewed every five years.

**Supplementation:**

Supplementation of this policy is granted to departments and offices so long as the contents of any such supplement do not conflict with this policy or other requirements.

**Suggested improvements:** Users are invited to send comments and suggested improvements to:

Office of the President  
ATTN: Policy Administrator  
Eastern Washington University  
214 Showalter Hall  
Cheney, WA 99004

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## **CHAPTER 1 INTRODUCTION**

### **1-1. Purpose**

This policy establishes standards for acquisition, use, and control of cellular telephones and other mobile communication devices for Eastern Washington University.

### **1-2. General**

Eastern Washington University is committed to providing essential, business-related tools and services to its faculty and staff in a manner which is fiscally responsible, complies with federal, state and university requirements, and reduces or eliminates administrative costs whenever possible. Cellular phones and cellular data services offer efficiency for University employees having legitimate business needs for this technology.

### **1-3. Definitions**

Cell Phone: Any wireless device used for voice communication. This includes wireless devices used for text, data, or e-mail communication if they are also used for voice communication. This policy also governs the acquisition and use of wireless modems or 'Air Cards'.

### **1-4. Office of Information Technology – Customer Support Systems**

The Customer Support Systems department will maintain records of departments and individuals authorized to have cellular equipment and service. Records will consist of types of equipment, lines, monthly usage and charges (invoice copies), and other information necessary to support university operations and related policies

## **CHAPTER 2 ACQUISITION**

### **2-1. Justification**

University-owned cell phones may be provided to employees with a legitimate need for such equipment.

When it is more efficient or when official business cannot be accommodated by other means, acquisition and use of a university-owned cell phone may be authorized. In such circumstances, supervisors will request a cell phone using the form at appendix A. All requests for cell phones must be justified in writing and be approved by the appropriate vice-president or his/her delegate.

The use of a cell phone by an employee for University business is for the benefit of the University in the furtherance of its mission; it is not for the convenience of the employee.

A 'legitimate need' is defined as follows:

The need to be readily accessible for contact with the public or with university faculty, staff, or students, for required or essential business communication due to:

- a. frequent travel, working at a remote location, etc;
- b. the need to receive or initiate communication in emergency situations;
- c. the need to be accessible and available during working hours (when away from assigned land-line telephone) and/or during non-business hours; and/or,
- d. the need to frequently access email and calendar when access is not readily available through other means.

### **2-2. Options**

Departments have two options when requiring an employee to carry a cell phone in order to perform his/her duties:

- a. Assign a University-owned device.
- b. Authorize reimbursement for employees who have occasional minimal use of a cell phone for business purposes, subject to the following provisions:
  - (1) Employees must have prior supervisor authorization. This may be a general authorization by the supervisor based on the individual's position or it may be a temporary authorization based on a specific event.
  - (2) No reimbursement will be made toward the employee's expenses for their included cell phone plan. Reimbursements will only be allowed for additional costs incurred for business related use such as roaming charges and charges for minutes exceeding the calling plan. Reimbursement will be calculated as described in appendix B.
  - (3) The employee must submit an Invoice Voucher including evidence of the business use of their personal cell phone as well as evidence of the additional costs which they incurred as a direct result of the business use. Employees must also demonstrate that the cell phone use was necessary and that other methods of communication were not readily available or were not adequate for supporting the business needs of the university.
  - (4) Departments that authorize reimbursements under this section are responsible for funding those reimbursements.
  - (5) No reimbursement shall be made for an employee's use of a personal Air Card.

### **2-3. Requests**

The acquisition of university owned cellular telephones or Air Cards shall be provided through the Office of Information Technology (OIT). Programs and departments desiring cellular telecommunications services must send a written request to OIT using the request form at appendix A. Prepaid cellular phones shall not be purchased using university funds.

### **2-4. Sponsored Projects/Grants and Contracts**

Cell phones may be purchased and used for a sponsored project/grant or contract activities when the sponsored project/grant or contract language stipulates that the principal investigators, other research personnel, or instrumentation, need such devices to perform their work. In such cases, the need for a communication device must be documented in the grant proposal and/or budget justification during the grant submission process, and the sponsor must approve (or not specifically disapprove) the expense as a direct charge on the grant. The principal investigator must ensure that monthly recurring charges are clearly identified as part of the initial budget request.

Principal investigators shall take appropriate measures to prevent misuse of cell phones and similar devices acquired through sponsored projects/grants and contracts. Such measures include informing project staff of the contents of this policy and periodically reviewing cell phone statements.

OIT will be notified in advance when a grant/contract is ending so that the last date of cellular phone service can be determined. If a cell phone (device) is to be used on a new sponsored program, OIT is to be informed in writing of the project name and funding information to ensure that cellular phone charges are applied to the proper program.

Sponsored Projects/Grants and Contracts written and submitted prior to the effective date of this policy are not subject to this policy but shall conform to the rules and standards in place at the time the proposal was written/submitted.

### **2-5. Vendors**

- a. Authorized Vendors: Cellular phones and related services will only be acquired from vendors who have current contracts to provide such equipment and services to Eastern Washington University. Any exception to this requirement must be approved by the Office of Information Technology.
- b. Misuse of vendor contracts: State contracts with cellular vendors for equipment and services shall not be used to obtain equipment or service for personal use.
  - (1) Employees may accept other discount-rated programs offered for personal use and available to the general public, or discounts offered for personal use to an individual as a member of an employee group, occupation, or similar broad-based group from cellular vendors as permitted by the Ethics in Public Service Act, Chapter 42.52 RCW. However, University agreements and state master agreements shall not be for personal use.
  - (2) University employees may not obtain cellular equipment or services for personal use in any way that would obligate or make EWU financially liable for charges incurred in the event of employee default.
  - (3) Use of special "government" rates, such as GOV-MIN, which requires the employee to sign in such a way that the university, or a department of the university, is ultimately liable for payment, is prohibited.

## **CHAPTER 3**

### **USE OF UNIVERSITY-OWNED EQUIPMENT**

#### **3-1. General**

University-owned cellular phones are provided for the conduct of University business only. This includes incoming and outgoing calls. Personal use is not permitted except de minimis use which is limited in duration and frequency and does not result in any additional costs to the University, such as when notifying family members of changes in travel plans or in emergency situations

The state Constitution, the Ethics in Public Service Act , and EWU Policy 590-020-140, Appropriate Use of University Facilities, Equipment and Information strictly prohibit certain non-business uses of state resources. Any use of state resources to support such activity clearly undermines public confidence in state government and reflects negatively on state employees generally.

#### **3-2. Other Restrictions**

- a. Alternatives: Cellular phones are not to be used when less costly alternatives are readily available. When working at a facility where land-based lines are readily available, the land-based lines should be used.
- b. Modification: Any modification to a university owned cell phone must be coordinated with and approved by the Office of Information Technology. This restriction includes any modification of cell phone equipment, calling plans, features, or applications. This provision applies even if the employee intends to pay for the additional expense or if there is little or no cost to the University.
- c. Applicable Laws and Ordinances: Employees must observe applicable laws or ordinances regarding the use of personal communication devices while driving including but not limited to, prohibitions on sending, reading or writing text messages while driving and prohibitions on holding a wireless device to an employee's ear while operating a moving motor vehicle per RCW 41.61.667 and RCW 41.61.668

#### **3-4. Violations**

Improper use of University communication services and equipment or any other violations of this policy will result in discipline, up to and including termination. Improper use includes any use that is a violation of state law or regulation, or of any university policy. Further information related to violation reporting, investigation, and enforcement is contained in EWU Policy 590-020-140, Appropriate Use of University Facilities, Equipment and Information.

#### **3-5. Disposal**

Cell phones and other mobile communication devices that are worn out, obsolete or no longer needed shall be returned to the Office of Information Technology for recycling or destruction.

## **CHAPTER 4 PRIVACY AND SECURITY**

### **4-1. Privacy**

Cellular telephones are not secure. Discretion should be used in relaying confidential information on cell phones. In particular, cell phones with email, text messaging, Internet, and/or voicemail, require special attention regarding security and privacy. These technologies create an electronic record which can usually be reproduced. As such, those electronic records are public records subject to Washington State's Public Disclosure Records Act (RCW 42.56).

Electronic records relative to the cell phone are not private. Such records may remain part of a University file system long after they have been supposedly deleted. Further, electronic records may be disclosed for audit or legitimate state operational or management purposes. The university Information Security policy, EWU Policy 203-01, provides additional information related to privacy and disclosure of such information.

### **4-2. Physical Security**

Precautions must be taken to restrict access to University-owned cell phones to authorized personnel. If a cell phone becomes lost or stolen, the user and/or department shall immediately notify the OIT Help Desk. OIT will take appropriate action to protect university data. If theft is suspected, employees shall file a police report with the appropriate police department within 24 hours of discovering the loss.

**APPENDIX A  
CELL PHONE REQUEST**

Telecommunications Services

**Request for Cellular Telephone Equipment and Services**

Date: \_\_\_\_\_

Requestor's Name: \_\_\_\_\_ Contact Phone # \_\_\_\_\_

1) Name of End User \_\_\_\_\_

2) Phone Upgrade? YES NO Cell # \_\_\_\_\_ Banner Index: \_\_\_\_\_

3) New Service? YES NO

4) \* Phone Choice: \_\_\_\_\_ \$ \_\_\_\_\_

5) Combination Voice & Data Plan: \_\_\_\_\_ \$ \_\_\_\_\_

6) Text Messaging \_\_\_\_\_ \$ \_\_\_\_\_

7) \*Accessories \_\_\_\_\_ \$ \_\_\_\_\_

Estimated Total \$ \_\_\_\_\_

\* Banner Index Code: \_\_\_\_\_

Additional Notes: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please have a person with Budget Authority review the above information, including the Index Code. Sign, date and return to 109 HUS.

Approved By: \_\_\_\_\_ Date: \_\_\_\_\_

## **APPENDIX B REIMBURSEMENT**

### **B-1. General**

When an employee has prior supervisor approval to use their personal cell phone for university business and to be reimbursed for such use, reimbursement amounts and procedures will conform to the provisions of this appendix.

### **B-2. Reimbursement Procedure**

To request reimbursement under this section, the employee shall complete an Invoice Voucher available at the accounts payable web site. The employee's supervisor and the appropriate budget authority must approve and sign the request before forwarding it to the Office of the Controller, Attn: Accounts Payable.

### **B-2. Calculations**

No reimbursement will be made toward the employee's expenses for their included cell phone plan. Reimbursements will only be allowed for additional costs incurred for business related use such as roaming charges and charges for minutes exceeding the calling plan.

Reimbursement will be calculated as follows:

- (a) Roaming charges will be reimbursed for business calls indicated on the cell phone bill.
- (b) Charges for minutes exceeding the calling plan will be reimbursed as the greater of:
  - (i) Overage Minutes Method A: Business call minutes divided by total minutes for all calls multiplied by total overage charges.
  - (ii) Overage Minutes Method B: Business call minutes divided by overage minutes (not to exceed 1.0) multiplied by total overage charges. This method shall only be used if the employee can substantiate that the overage charges resulted primarily from business requirements rather than from personal calls.

**Example:** An employee makes 110 minutes of business calls on their cell phone in the beginning or middle of their billing cycle. The calling plan includes 800 minutes. The employee's monthly bill includes charges for 60 overage minutes which included a 5-minute business call. Since only 5 minutes out of 60 overage minutes are business related, the overage charges (\$38.50) are primarily due to personal use. Therefore, Method A above must be used for reimbursement.

Method A reimbursement example:

Business call minutes (110) divided by total minutes for all calls (860) equals .128, multiplied by total overage charges (\$38.50) equals \$4.93.

Method B reimbursement example:

If the majority of business calls had been made at the end of the month and accounted for most of the overage minutes then method B may be used and would be:

Business call minutes (110) divided by overage minutes (60) equals 1.83 (which is then adjusted to the 1.0 maximum), multiplied by total overage charges (\$38.50) equals \$38.50.