

Cellular Communications

Purpose

The purpose of this policy is to regulate the provision of institutionally-paid cellular communication devices and services to achieve the following goals:

- To control institutional expenses
- To facilitate cellular communications for those with a justified need
- To create a control structure that ensures appropriate administrative approvals
- To provide cellular service in an administratively efficient manner (i.e., approval, budgeting, payment, property management, and service plan review and management)

It is not the purpose of this policy to move away from future technology or inhibit future development of next generation communications. Cellular communications will continue to grow in frequency and importance. This policy will provide a framework for administrative oversight of cellular communications on the campus going forward.

Eligibility Criteria

Cellular communication eligibility will be based on institutional need. Cellular devices and services will be provided when patterns of use meet one or more of the following criteria:

- **University-provided Cellular Service and Equipment:**
 1. To provide for the protection of safety, health, and property
 2. To provide service for employees responsible for administering critical campus infrastructure
 3. To comply with the rules and regulations of a governing organization to which the university is a member. The chancellor and the vice chancellors will have the authority to designate employees within their respective divisions or units who are eligible to receive and utilize cellular devices and services
- **Monetary Reimbursement for Cellular Service for Employee-owned Device (does not include purchases, upgrades, repairs, etc.):**
 1. Where job duties routinely require employees to utilize their own device, or be accessible for significant periods of time in order to adequately accomplish their regular work tasks
 2. Where job duties routinely require employees to be away from their office for significant amounts of time for travel, field work, etc. and have a need to be accessible

A goal of this policy is to create and maintain a database of approvals and justifications for university-supported cellular devices. Therefore, concurrent with the implementation of this policy, a review will be initiated for all university-supported cellular service. Most university employees **are not eligible** for university-provided cellular service. There must be either a strong and continuing need for service that meets the criteria defined above or another well-justified need that has been granted approval as specified herein.

When an employee has been granted approval for university-provided cellular service, the university reserves the right to publish the telephone number, as deemed appropriate, based on the purpose for which the device was approved.

Approval Authority and Funding

Administrative approval must be granted by the relevant budget authority for the funding source—by the department head, dean, vice chancellor, vice provost, or the appropriate vice chancellor, etc. For uses not fitting within the above pre-established criteria, an additional justification with approval based on need and benefit to the institution is required. The Fayetteville Policy 306.1 Cellular Communication Justification and Approval Form is to be used for securing and documenting approvals.

Payment must be provided from the unit to which the person authorized for service reports. There is not a central university funding source for institutionally provided cellular service.

Approval for institutionally-paid cellular communication devices and services is for a maximum of twelve months ending on June 30 of each fiscal year. The twelve-month period necessitates at least annual renewal of the administrative approval for institutionally-paid cellular communication devices and services. Proof of cellular service must be provided to the immediate supervisor at the time of the submission of the Justification and Approval form.

Departments having large numbers of employees receiving university-provided cellular service will be able to submit the Justification and Approval forms via a batch process.

Program Administration

Each department or unit with employee(s) authorized for university-provided cellular service will have an identified cellular communications administrator to provide a central point of administrative contact. The administrator will ensure that employee-purchased devices are compatible with the requirements of the job to be performed on behalf of the university and that the costs are commensurate with unit resources.

Options for Service

1. **University-provided Cellular Service and Equipment** – cellular service and equipment are established in the name of the university and managed through the Telephone Services office, with the bill paid by the university. When personal use incurs additional costs, a reimbursement will be made by the employee to the university to cover the added expense.
2. **Monetary Reimbursement for Employee-owned Device (the preferred service option)** – cellular service is established and paid by the user with monthly reimbursements made from a departmental cost center for a pre-approved amount to compensate for business use of an employee's equipment and service. Reimbursement rates are authorized as follows, but may be set at lower levels at the discretion of the approving authorities: \$50 per month (including data and text plans), with allowance of up to a maximum amount of \$100 per month to accommodate the needs of heavy data users based upon additional justification and approval in accordance with the approval authority process cited above. Equipment is to be provided by the employee.

3. **Reimbursement to Employee for Incidental Use of a Personal Cellular Device** – occasional reimbursements may be made for business use of a personal cellular device on an as needed basis. Reimbursement claims are to be submitted in accordance with university regulations and supported with appropriate billing detail from the service provider. Examples of such reimbursements could include unusually heavy data usage required to complete a work-related project or international service when managed properly to conserve university resources.

Periodic Eligibility Review

An eligibility review should be performed whenever an employee's work assignment changes to the extent that the approval criteria are no longer met. Reimbursement rates should be verified against source documents by the funding unit annually at a minimum.

Processing monetary reimbursement for employee-owned devices

Finance & Administration staff intend to develop and implement an automated system to handle the processing of service requests for university-provided cellular service and equipment and requests for monetary reimbursement for employee-owned devices. When the automated process is operational, this policy statement will be revised. Until that automated process is fully developed the following manual process shall be utilized.

Once final approval has been granted for monetary reimbursement for an employee-owned device, the Cellular Communication Justification and Approval form must be forwarded to the Accounts Payable office (AP). AP will develop a database of the approved reimbursements that will include the employee name, employee title, budgetary unit, company cost center, departmental category, the term of the reimbursement (not to extend beyond the fiscal year-end), and the monthly reimbursement amount.

AP staff will then enter University Payment (UPAY) transactions into the University Procurement System (UPS) for each employee's approved monthly reimbursement. Those UPAY transactions will be submitted and flow through the University's normal TARGET approval process. Once the UPAY has been approved and returns to AP the reimbursement will be disbursed. The AP employee disbursing the reimbursement cannot be the same employee as the one who created and submitted the UPAY transaction. AP staff will continue to monitor the eligibility of employees receiving reimbursement by reviewing the payroll termination notices that are received from Human Resources.

The identified cellular communications administrators are responsible for monitoring any other changes in the eligibility status of the employees in their departments or units, and communicating those changes to the Accounts Payable Manager.

FOIA

Whenever university-paid cellular service is used to conduct university business, whether on personal or university-provided service, records of such communication should be considered subject to disclosure under the Arkansas Freedom of Information Act, unless the nature of the record is otherwise exempt under the law.

Data Security and Confidentiality

Security sensitive institutional data must be protected from unauthorized disclosure. Do not retain security sensitive institutional data on local or mobile devices. Password protect both university-owned devices and those supported by allowances. Do not text private university data or protected personal information such as social security numbers, passwords, or credit card numbers. All mobile devices must be properly disposed of when no longer in use, with precautions taken to prevent disclosure of sensitive or confidential university-related information.

Cellular Service for Cost Centers Funded by Externally Funded Sponsored Agreements (Grants and Contracts)

Cellular equipment and services are generally not considered an allowable expense on sponsored agreements. However, they may be charged against such cost centers consistent with the regulations and guidelines associated with the award. Such expenditures must be specified in the budget, approved by the sponsor, and receive prior approval by Research Accounting for charges against grants or contracts.

Contract Changes or Cancellations

The university will not accept responsibility for the cost of contract changes or early cancellation penalties for individual cellular plans except under extraordinary circumstances where justification has been provided and administrative approval granted by a vice provost, vice chancellor, or the equivalent.

Property Management

State and institutional property management regulations will apply to all university-owned cellular devices. Care should be taken to properly track and dispose of all institutionally owned devices according to surplus property disposal regulations.

Utilization of Cellular Devices While Driving

Arkansas Code Annotated §27-51-1504 states “(a) Except as otherwise provided in subsection (b) of this section, a driver of a motor vehicle will not use a handheld wireless telephone for wireless interactive communication while operating a motor vehicle.

Subsection (b) of the code makes exceptions for emergencies and for persons performing official duties as a certified law enforcement officer, firefighter, ambulance driver, or emergency technician.

University employees driving on university business must comply with all applicable state and federal laws as well as university policies.

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