

EDINBORO UNIVERSITY OF PENNSYLVANIA

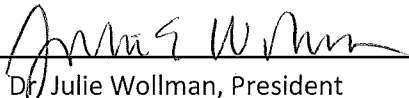
UNIVERSITY WIRELESS COMMUNICATION DEVICE POLICY – Policy No. C060

Supersedes Policy No. C060, Dated 3/21/2012

Recommended for Approval by


Mr. Guilbert Brown, Vice President Finance and Administration

Approved by

 on 2/2/15
Dr. Julie Wollman, President

Review Date: As Required

INTENT

The intent of this policy is to simplify the means by which the University can benefit from employee access to wireless services while allowing a qualified employee to use the same device for both personal and University business purposes.

This policy will enable the University to comply with IRS regulations to:

- a) Achieve maximum productivity and cost-effectiveness while employing wireless communications devices as a business solution; and
- b) Appropriately and effectively manage the payment/reimbursement of costs associated with the business use of wireless communications devices.

This policy applies to all faculty, staff and administrators who, as a part of their official University employment require the use of a wireless communications device.

POLICY

Edinboro University will provide specifically designated employees with non-taxable allowances that it judges to be sufficient to pay for the cost of their use of personal cellular telephones and related devices for University business purposes. Under IRS regulations, if a wireless communications device is personally-owned by the employee, the employee may be compensated for business use through an allowance or stipend, which is non-taxable.

Employees who apply to enroll in the allowance program will be deemed eligible based on the University's business need for them to have the services involved. The Vice President for Finance and Administration will determine eligibility.

DEFINITIONS

Wireless Communication Device (WCD): A device that transmits and receives voice, data, and/or text communications without being physically connected to the University network. This includes, but is not limited to, the following:

1. Cellular telephones
2. Pagers
3. Wireless Internet service
4. Wireless data service
5. Cellular telephone/two-way devices

ELIGIBILITY FACTORS

Key Personnel

- If the employee is designated among key personnel for executive management (i.e., members of the President's Cabinet), emergency or safety purposes.
- If the employee supports or is responsible for programs, services or systems that necessitate frequent and immediate communications throughout the day, after-hours or while away from the office on travel.

Technical Monitoring

- If the employee is required to monitor essential systems, which may include receiving text messages from such systems upon outages or conditions outside of operating standards.
- If the employee must be available immediately for service calls or troubleshooting during the work day.

No Better Communication Source

- If the employee does not have access to other communication devices while on the job either because the employee has no assigned office and/or primary work location changes based on assignments. Such employees are only eligible for designation if the University requires that they maintain regular contact with the institution and if cellular technologies are judged by the University to be the best options for doing so.
- If the employee is required to travel on a frequent basis and must maintain regular communication while in travel status.
- If the employee performs the majority of his/her job duties in the field where business either cannot be conducted by a landline telephone or it would be inefficient to use a landline telephone.

PROCEDURES

Expectations of the University and the Employee in the Program

Under this policy, the University's provision of an allowance for this purpose means that a qualified employee is expected to acquire and maintain in working order (through personal purchase and/or subscription/service contract) his or her own WCD. The University further expects the employee to provide to the University the cellular telephone number to which he or she is applying the allowance so that the number may be used in the conduct of University business.

How the Program Works

No employee should assume that he or she is entitled to an allowance to pay for business use of a WCD or service. Employees seeking designation for enrollment in the program must demonstrate eligibility in accord with the criteria listed above and must document the business reason(s) why such enhanced communication capabilities are in the University's interests, using the **Wireless Communications Employee-Owned Device Justification and Approval Form** (Attachment A).

Allowance

All University paid reimbursements of personal wireless communications devices will be at the fixed rate of \$45.00 per month. If business use of the WCD is required to support the employee's job responsibilities, then the employer is not required to include the allowance as taxable compensation and is not required to withhold federal income taxes, state income taxes, FICA, Medicare, or Pennsylvania Unemployment Compensation taxes. An employer-provided allowance is not taxable as compensation provided the allowance is not a substitute for a portion of the employee's regular wages.

Verification will be conducted once annually by means of receiving scanned copies of personal wireless communication device bills, that the employee has a personal WCD plan.

If an employee is no longer eligible for an allowance, the employee's department must submit a timely notice to Information Technology Services. Qualifying events include change in job/position where the new role does not require the use of a WCD, employee termination, or management decision.

Exceptions

In order to take advantage of priority designation in emergencies, the University will continue to purchase and assign cell phones or other WCDs to specifically identified University personnel, such as University Police, Health and Safety staff, and Facility Management staff. Justification and approval for procurement of University-owned WCDs must be obtained by completion of the **Wireless Communications University-Owned Device Justification and Approval Form** (Attachment B).

These WCDs are the sole property of the University and are restricted to business use only. No personal calls are permitted and in the case of data plans, no personal data use is permitted. The employee's department will be charged for the cost of the equipment and monthly service plan. The value of the

use is not taxable as compensation to the employee. The use of University-owned property for personal pecuniary gain is prohibited and could result in discipline, up to and including termination.

RELATED POLICIES

Procedure/Standard Number 2011-10, Guidelines for University Use of Cell Phones, Office of the Chancellor

C057 - Acceptable Use of Technology Policy

CONTACT INFORMATION

Contact	Office	Address	Telephone
Director, Networks and Telecommunications	Information Technology Services	Room 010 Ross Hall	814-732-1020
Vice President, Finance and Administration	Finance & Administration	Room 208 Reeder Hall	814-732-2585

Attachment A: Wireless Communications Employee-Owned Device Justification and Approval Form

Attachment B: Wireless Communications University-Owned Device Justification and Approval Form

ATTACHMENT A for

**Wireless Communications Employee-owned Device
Justification and Approval form for Business Need**

DATE:	
EMPLOYEE NAME:	
EMPLOYEE ID#:	
EMPLOYEE TITLE/FUNCTION:	

I supervise the above employee, and I am writing to certify that the work he/she performs requires the higher degree of access available through wireless communications. The following factors support a wireless communications allowance for the employee [*check/complete all that apply*]:

Key personnel	
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee is designated among key personnel for executive management (i.e., members of the President's Cabinet and academic deans), emergency or safety purposes.
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee supports or is responsible for programs, services or systems that necessitate frequent and immediate communications throughout the day, after-hours or while away from the office on travel.
Technical monitoring	
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee is required to monitor essential systems, which may include receiving text messages from such systems upon outages or conditions outside of operating standards.
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee must be available immediately for service calls or trouble-shooting during the work day.
No better communication source:	
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee does not have access to other communication devices while on the job either because the employee has no assigned office and/or primary work location changes based on assignments. Such employees are only eligible for designation if the University requires that they maintain regular contact with the institution and if cellular technologies are judged by the University to be the best options for doing so.
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee is required to travel on a frequent basis and must maintain regular communication while in travel status.
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee performs the majority of his/her job duties in the field where business either cannot be conducted by a landline telephone or it would be inefficient to use a landline telephone.
Other justification:	
<input type="checkbox"/>	[enter justification here]

The University reimburses the individual with a monthly allowance of \$45. This requires employees to provide their personal number for business use.

Once annually, verification by scanned copy of employee cell phone bill, is required.

	SIGNATURE	APPROVED?		DATE
		Yes	No	
Supervisor:				
VP for Fin/Admin:				

Return completed form to Information Technology Services, Ross Hall.

ATTACHMENT B for

**Wireless Communications Business-owned Device
Justification and Approval form for Business Need**

DATE:	
EMPLOYEE NAME:	
EMPLOYEE ID#:	
EMPLOYEE TITLE/FUNCTION:	

I supervise the above employee, and I am writing to certify that the work he/she performs requires the higher degree of access available through cellular communications. The following factors support a wireless communications device for the employee [*check/complete all that apply*]:

Key personnel	
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee is designated among key personnel for executive management (i.e., members of the President's Cabinet and academic deans), emergency or safety purposes.
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee supports or is responsible for programs, services or systems that necessitate frequent and immediate communications throughout the day, after-hours or while away from the office on travel.
Technical monitoring	
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee is required to monitor essential systems, which may include receiving text messages from such systems upon outages or conditions outside of operating standards.
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee must be available immediately for service calls or trouble-shooting during the work day.
No better communication source:	
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee does not have access to other communication devices while on the job either because the employee has no assigned office and/or primary work location changes based on assignments. Such employees are only eligible for designation if the University requires that they maintain regular contact with the institution and if cellular technologies are judged by the University to be the best options for doing so.
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee is required to travel on a frequent basis and must maintain regular communication while in travel status.
<input type="checkbox"/>	<ul style="list-style-type: none"> The employee performs the majority of his/her job duties in the field where business either cannot be conducted by a landline telephone or it would be inefficient to use a landline telephone.
Other justification:	
<input type="checkbox"/>	[enter justification here]

The user understands that the wireless device issued is owned by the University and as such is University property. Therefore, in all circumstances, the device must be surrendered to Edinboro University upon request. It is also understood that this device is restricted to business use only.

	SIGNATURE	APPROVED?		DATE
		Yes	No	
Supervisor:				
VP for Fin/Admin:				

Return completed form to Information Technology Services, Ross Hall.