



POLICY & PROCEDURE DOCUMENT

NUMBER: 5.5093
UNIT: Information Technology Services
TITLE: Cellular Allowance Policy
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AUTHORIZED: AVP for Information Technology Services

I. Purpose and Scope

This policy provides protocols, guidelines, and establishes procedures for the authorization, deployment, and use of University funded cellular services. The purpose of this policy is to contain costs, ensure departmental and personal accountability/responsibility, and to prevent improper use of devices utilizing cellular service.

II. Policy

The University will not provide university-owned cellular phones for the use of individual employees. Employees whose duties and responsibilities require them to maintain significant contact with the University while away from the office or to be accessible after normal working hours may be eligible for compensation in the form of a monthly allowance. An employee with a cellular allowance must maintain active cellular service for the life of the allowance or must notify their supervisor immediately if service is disconnected.

General

Mobile devices are an effective resource for Western Kentucky University because they enable communication in areas or situations where conventional resources are not readily available or are impractical. However, the cost incurred by a devices leveraging cellular services must be weighed carefully.

In general, a cellular allowance may be provided to an employee for whom the nature of their work requires wide mobility, immediate or timely response for example, but not limited to: University senior staff, directors, deans, and those serving in on-call capacities.

Terminology

The term "Western Kentucky University," "WKU," and "the University" are used interchangeably. The term "user" and "personnel" refers to the individual or individuals using the cellular service. The term "RF" refers to the radio frequency; "FCC" refers to the Federal Communications Commission; and "FDA" refers to Food Drug Administration.

III. Procedure

1. Procedures

1.1. Cellular Allowance

Qualified employees whose job duties require the frequent need for cellular service as listed in section 1.3.1, may receive supplemental compensation (in the form of a monthly cellular allowance) to cover business-related use of an individual's personal cellular service. The policy assumes that for most employees, the device will be used for both business and personal use and it is appropriate for the University and employee to share the overall costs. Thus, the allowance amount is not intended to cover 100% of the monthly service plan's cost.

Qualified employees are eligible for the following monthly allowance options:

- \$30.00 - voice and text
- \$20.00 - data only
- \$60.00 - voice, text, and data

Qualified employees are also eligible for up to a \$200.00 equipment reimbursement once every two years. A Form 16 must be completed along with a receipt of purchase. Further instruction can be found at <https://www.wku.edu/policies/business-finance> - Policy 3.4012 Form 16: Special Payroll Authorization. The nature of cellular provider offerings are subject to frequent change and thus it is anticipated that this exact financial structure may not clearly fit all needs. The equipment reimbursement may be modified to better fit current offers so long as the reimbursing department consents and the total value does not exceed \$200 every two years. Proof of expenditure is still required.

A cellular allowance option may be modified should the nature of the employee's job changes.

Those who receive an allowance are subject to review by the University to verify the necessity of the cellular allowance. Employees may also be required to provide their cellular bills detailing University-related usage to the University upon request.

Employees who receive a cellular allowance agree to utilize the covered services (voice, text, and/or data) for business-related purposes as instructed by departmental management and per applicable requirements of the employee's position. It is recommended to place such requirements in writing.

Recipients further understand and agree that their cellular contact information may be made available to and used by University officials outside their department, college or division for purposes of emergency or essential services activation.

1.2. Device Types

Cellular devices eligible for an allowance or reimbursement must be essential for the job duties. Device types such as cellular modems, tablets, or hotspots may be classified as essential upon approval.

1.3. Authorization

1.3.1. Who Has Authorization

It is the responsibility of an employee's department to determine whether the employee's position requires that a cellular allowance should be granted. The University defines the following business purposes as qualifying instances where a cellular allowance may be granted:

- The employee is responsible in emergency matters where they must be available to be contacted and/or respond in the event of an emergency.
- Employees who are frequently "on call" officially or implicitly and/or need to be contacted in an immediate or timely manner (during or after regular business hours) to respond to situations pertinent to their assigned job responsibilities. If the contact is deemed by the department as occasional usage, reference section 3 of this document.
- Employees who commonly perform work out of the office or in a mobile capacity where they require reliable communication.
- Employees who frequently travel or are out of the office and need to be in contact with University personnel or affiliates to conduct University business.

1.3.2. Getting Authorization

Authorization is subject to Department Head/Director approval. Upon approval an EPAF will be created and an approval process, which includes Chief Divisional Officer or appropriate Vice President, Dean, Director, or Department Head, will need to be completed before the allowance will take effect.

The employee is responsible procedurally and fiscally for the purchase of the cell phone equipment. Costs for cosmetic or other peripherals that have no business purpose are the responsibility of the employee.

1.3.3. Contact Information

For questions regarding the cellular allowance policy and procedures, contact the Infrastructure & Operations Department at 270-745-6370.

1.3.4. Department Responsibilities

Departments/divisions must conduct annual reviews of both the necessity of and approved option of cellular allowances. The department may at any time modify or eliminate the cellular allowance as necessary. A new EPAF must be created each fiscal year for every cellular allowance. It is recommended to complete these prior to June.

The Cell Allowance EPAF Instructions can be found at: <https://www.wku.edu/its/cellular/>

No organization in the University can extend existing mobile contracts or enter into any new service contracts with cellular providers, except the Infrastructure and Operations Department within the Information Technology Services Unit.

Direct payment, via WKU procurement Card or other any other means, for mobile services, other data services, or devices is not allowable on WKU, WKU Foundation, Hilltopper Athletic Foundation, or WKU Research Foundation accounts, except under the agreement

listed in section 4 of the document.

1.3.5. Discounts for Cellular Service

It is the Universities intent to negotiate and maintain discounts with cellular providers for the procurement of individual cellular service. The department of Infrastructure & Operations will work with various cellular providers to develop discounts that will be passed on to the employees and students of WKU. Additional information about these discounts can be obtained on the ITS Unit website at <https://www.wku.edu/its/cellular>.

2. Employee Cellular Support

The employee is personally responsible for the equipment and monthly cellular service charges. All support for cellular service is provided by the cellular service company chosen by the employee. The University is under no obligation to provide support for individually owned cellular devices or services. The qualified employee will be responsible for his/her contract; therefore, the individual will need to contact the cellular provider with any billing/service issues.

The Technical Support Services Department will provide support for WKU related services such as email, calendars, and other relevant services such as iWKU app.

3. Reimbursement of Cellular Services

If an employee is not eligible for the allowance, such employee may request reimbursement for the actual extra expenses of business calls (but reimbursement for per-minute "air time" charges is limited to the total overage charge shown on the invoice, i.e., expenses for minutes included in the plan will not be reimbursed). The individual should make a personal payment to the provider then submit a request for reimbursement from the department.

- Example 1: An employee's personal phone has a 600 minute plan that costs \$40.00 (plus fees and surcharges). This month the employee used a total of 300 minutes of which it was determined that 100 of those minutes were business calls for WKU. The calls associated with work did not cause any overage charges on the employee's bill; therefore, the employee is not eligible to request reimbursement for the calls.
- Example 2: An employee's personal phone has a 600 minute plan that costs \$40.00 (plus fees and surcharges). This month the employee used a total of 650 minutes of which it was determined that 100 of those minutes were business calls for WKU. The calls associated with work did cause the employee to go over on the plan; therefore, the employee is eligible to request reimbursement for the calls. The employee may request an amount equal to the 50 minutes of overage charges incurred for the month.

If an employee is covered by a cellular allowance but experiences an atypical situation creating a cost burden directly resulting from business use, such employee may request reimbursement for the expenses above and beyond the normal service. The individual should make personal payment to the provider then submit a request for reimbursement from the department.

- Example 1: An employee will be travelling internationally and on a temporary basis applies an international plan to their cellular service. A situation such as this should be approved in writing, with documented costs, prior to the modification of cellular service and resulting fiscal liabilities.
- Example 2: An employee will be travelling for a length of time resulting in a situation

where the employee utilizing higher than normal cellular data services directly related to University business functions. If the employee has an amount limited data plan but is required to utilize more data than the plan allows resulting in overage charges, a reimbursement may be requested.

These types of reimbursements should be an exception. They are recommended for individuals who have frequent reimbursements to work with their Chief Divisional Officer or appropriate Vice President, Dean, Director, or Department Head to determine the most cost effective and policy compliant options for the situation. The Infrastructure & Operations department can be consulted on unique situations.

4. University Owned, Shared Use Cellular Devices

The Infrastructure & Operations Department will maintain a centrally managed cellular services account for the rare use of departmental cellular devices. The department will receive and pay the initial bill and rebill each department on a monthly basis.

4.1. Departmental Device Request

The Infrastructure & Operations Department, with approval by an applicable budget authority, will order cellular devices for departmental use. Submit a request with the ITS Service Desk. Contacting options are listed at <https://www.wku.edu/its/service-desk>.

IRS policies are clear about personal use of business sponsored cellular devices/services; therefore, the University advises that personal use of University sponsored devices should only be in emergencies. However if personal use of a university device occurs, the personal use of the wireless device must be reimbursed to the University account covering the costs of the device/service by the employee. Departments will be responsible for collecting any reimbursements amounts from employees.

- Example 1: A departmental phone has a 600-minute plan that costs \$40.00. The employee used 300 minutes, but 100 of those were personal. The total bill is \$40.00. The employee should pay one third of the total bill. Use this formula: $100/300 \times \$40.00$. This equals \$13.33.
- Example 2: A departmental phone has a 600-minute plan that costs \$40.00. This month the employee made calls totaling 650 minutes. The total bill is \$57.50 (\$40 plus \$.35 per minute over 600 minutes). Of those minutes, 100 were for personal calls. The employee should pay $100/650 \times \$57.50$. This equals \$8.47 for personal calls.

Noncompliance with this policy will result in termination of the wireless device and service. The department will be responsible for any charges resulting in the termination of service.

4.2. Departmental Device Cancellation

If your department would like to cancel service on a departmental cellular device, place a request with the ITS Service Desk. Multiple contact methods are detailed at <https://www.wku.edu/its/service-desk>

5. Mobile Device Use While Driving

Kentucky State law prohibits any form of reading and/or sending messages on a device while driving. The law states in part the following. Please reference the Kentucky Revised Statutes for full details.

“No person may write, send or read a text-based communication (including text messages, instant messages and emails) while operating a motor vehicle that is in motion”

If an employee has an accident while using the wireless device, WKU assumes no liability.

While driving, it is recommended that the user pull completely off the road and come to a complete stop in a parking area or other safe place before using a mobile device.

6. Health Risks Concerning Wireless Device

There is no proven evidence to date that radio frequency (RF) from wireless equipment will cause any health problems. WKU does not assume any responsibility for unknown risk from wireless device use. The Federal Communications Commission (FCC) and the Food Drug Administration (FDA) each regulate wireless devices. The FCC ensures that all wireless devices sold in the U.S. follow safety guidelines that limit RF energy.

7. Misuse of Cellular Service

The misuse of the cellular service – using it in ways inconsistent with University policy or with local, state or federal laws – will result in immediate cancellation of the cellular allowance and departmental devices.

IV. Related Policies

V. Reason for Revision

Formatting and language changed for consistency with other ITS policies.

This policy was last reviewed on May 1, 2020.