Cellular Device Policy

ROWAN UNIVERSITY POLICY

Title: Cellular Device Policy
Subject: Information Resources and Technology
Policy No: IRT:2018:06
Applies: University-Wide
Issuing Authority: Senior Vice President for Information Resources and Technology and Chief Information Officer & Senior Vice President for Finance and Chief Financial Officer
Responsible Officer: Senior Vice President for Information Resources and Technology and Chief Information Officer & Senior Vice President for Finance and Chief Financial Officer
Date Adopted: 06/18/2018
Last Revision: 08/14/2023
Last Reviewed: 05/31/2023

I. PURPOSE

The purpose of this policy is to set guidelines for:

1. Authorizing reimbursement for personal cellular device usage by Rowan University employees.
2. Authorizing the purchase of cellular devices for use at Rowan University.

Rowan strives to provide employees with the right technology tools they need to do their jobs, to treat employees in similar roles equitably, and to use its resources wisely. The University recognizes that mobile phones are prevalent and that many users want a single device that supports both their work and personal lives. The University seeks to support employees' business technology needs while allowing users enough flexibility to choose devices and service plans that meet their personal and family requirements.

II. ACCOUNTABILITY

Under the direction of the President, the Chief Information Officer, the Chief Financial Officer and the Director of Information Security shall implement and ensure compliance with this policy.

III. APPLICABILITY

This policy applies to all Rowan University employees. Employees who have been assigned a cellular device by the University under a previous version of this policy will be brought into compliance with this policy on a timeline determined by Information Resources & Technology and the Division of Finance.

IV. DEFINITIONS

Refer to Rowan University Technology Terms and Definitions for terms and definitions that are used in this policy.

V. POLICY

1. The University provides a cellular device stipend program to subsidize the use of personal cellular devices for Rowan University business.
    a. Cellular device stipends are intended to reimburse employees for the incremental cost of business use on a personal mobile phone and thus represent nontaxable compensation to the employee. The stipend amounts will be set and reviewed periodically by the Division of Finance in conjunction with Information Resources & Technology. Program stipends are not considered

additional base pay and therefore are not eligible for benefits calculated on base pay. Stipends will be paid to eligible staff via payroll. The current stipend rates are provided in Appendix A.

b. Eligibility requirements. The stipend program is available to full time employees of the University. Part time, three-quarter time, graduate assistants, student workers and affiliates are not eligible for reimbursement under this program. To be eligible for the stipend program employees of the University must meet one of the following criteria:
    i. 24/7 access employees: day to day job responsibilities require routine response to urgent (immediate action required) University business at any time of the day or night - e.g., Information Technology, Plant/Facilities, Marketing, Clinical, Emergency Management, Public Safety, and Executive Management who have 24/7 on-call responsibilities.
    ii. Mobile employees: jobs require routine field work and need to communicate in real time with their office to give or receive direction or to conduct business - e.g., Admissions counselors, IT or Facilities field technicians, police officers assigned to the field., etc. Employees who regularly work from a remote location, including their home, do not qualify as mobile employees. Employees with remote work arrangements are expected to utilize the standard tools provided by IRT for communication and collaboration. A list of these tools is available at on the IRT website.
    iii. Other business cases proposed and justified by employee's direct supervisor and approved by the Dean or Divisional Vice President; must meet at least ONE of the following criteria:
        1. Role requires staff member to routinely respond to urgent (immediate action required) University business while the staff member is away from the office; supervisor must explain the business necessity.
        2. Role requires staff member to be routinely available while in remote locations, supervisor must explain the business necessity.
        3. Other business cases; supervisor must explain the business necessity.
c. Program stipends are categorized based on "Moderate Usage", "High Usage" and "Rowan Medicine". The current stipend amounts and parameters for each category are provided in Appendix A and are reviewed periodically.
d. Mobile phone equipment, including the device itself, accessories and app costs are the responsibility of the employee and are not reimbursable; the employee is responsible for any loss, theft, or damage. The phone must be able to run current operating systems and software, must have an active cellular plan, must be capable of making and receiving cellular telephone calls, and must be capable of sending and receiving SMS and MMS messages.
e. Stipend recipients must install the Duo two factor authentication and Outlook mobile client on their devices, and must agree to the baseline device security settings required by these applications. The Duo and Outlook applications do not themselves require and will not enable the University to read or transmit any other data stored on the device.
f. Employees may be required by their supervisors to carry a cellular device in order to fulfill the responsibilities of their position.
g. There is a limit of one cellular device stipend per employee. Employees who require "MiFi" functionality or with tablets, laptops or other devices requiring mobile data access are expected to utilize the "Personal Hotspot" functionality on their personal device. Personal MiFi devices or mobile hotspots are not covered under the stipend program.
h. To participate in the stipend program, employees:
    i. Must attest that their position requires the regular use of a cellular phone.
    ii. Will provide a justification for Rowan Medicine, moderate or high usage reimbursement based on the criteria defined in Appendix A.
    iii. Agree to provide the sponsoring supervisor with current contact information within 3 business days of inclusion in the stipend program or within 3 days of a change in that information.
    iv. Must renew their stipend requests annually.
    v. Must withdraw from the program when changes to their work assignment or responsibilities make them ineligible for participation in the program based on the criteria set forth in this policy.
i. Supervisors of employees requesting to participate in the program

i. Must review, approve and attest annually that the employee has a cellular device and that it is required for their work at a Rowan Medicine, moderate or high usage level.
ii. Must withdraw their approval when an employee is reassigned to another department, when their work assignment makes them ineligible for participation in the program, or if they fail to maintain a cellular device in compliance with this policy.

j. Divisional Vice Presidents are required to approve all requests submitted within their divisions annually.
k. Executive leadership, Vice President level and above, is considered pre-approved within the program at the “high usage” reimbursement based on the inherent responsibilities of these positions.
l. Delays, lapses or oversights in the approval process will not warrant retroactive payment of stipends and may not be submitted for reimbursement via other means.
m. Reimbursements for regular monthly cellular phone use via other means (Purchasing Card, Purchase Order, Reimbursement Request, etc.) are prohibited.
n. Reimbursement for infrequent, extraordinary business use of a personal device that is ineligible for the stipend program or infrequent but significant personal communications expense while performing University business (e.g., while traveling) may be submitted in an expense report with proper supporting detail seeking reimbursement of the cost in excess of their normal monthly plan cost. These reimbursements must be submitted in accordance with IRS accounting plan rules as with any other employee reimbursement, e.g., business travel expenses.
o. The reimbursement is not an entitlement. The amount can be changed or withdrawn without notice at any time.
p. The cellular device service is personally owned by the employee. An employee receiving a program stipend must maintain an active cellular device contract with a carrier for the life of the reimbursement.

2. The University will continue to provide cellular services and devices, potentially including MiFi devices, and are approved based on IRT’s determination of need in alignment with the following guidelines:
    a. Situations that meet any of the following criteria:
        i. There is a business need for a cellular device that is used by multiple individuals on a regular basis in which personal cellular devices cannot reasonably be substituted. This is generally limited to “duty” phones which are physically passed from individual to individual on shift changes and “pop up” service centers or other mobile field work in which personal cellular device hotspots do not reasonably meet the business need.
        ii. Cellular devices installed in fixed locations to facilitate communications. This is generally limited to security cameras or emergency phones affixed to standalone poles or posts.
        iii. Cellular devices installed in University owned vehicles. This is generally limited to Rowan patrol cars.
        iv. In other circumstances with the written approval of the Vice President for Information Resources & Technology.
    b. The University may regularly monitor information on and communications from University owned cellular devices to ensure they are being used in compliance with this policy. University owned cellular devices are not considered the property of an individual and there should be no expectation of privacy.
    c. Expenses associated with these University owned devices will be planned for and allocated to the appropriate University cost center through the standard, annual budgeting process. Expenses will not be billed monthly.
3. The University does not provide a pager program to employees. Pager services are not considered a reimbursable personal expense by the University. Individual business units are not permitted to contract for or otherwise acquire pager services.
4. Exceptions to the stipend program must be approved by the Assistant Vice President for the Division of Finance or higher. Exceptions to the University owned cellular device program must be approved by the Vice President for Information Resources and Technology.
5. Cellular Device Use
    a. Employees are encouraged to take appropriate safety precautions when using their cellular telephone. If your job requires that you keep your cellular device turned on while driving, you must use a hands-free device.

b. Writing, sending, or reading text-based communication —including text messaging, instant messaging, or email — on wireless or cellular devices while driving is a violation of this policy.
c. Employees are required to comply with applicable state and local laws regarding the use of cellular devices.

6. All electronic information, including communications, related to Rowan University business are considered legally discoverable regardless of whether or not the employee is on a University owned device or a personal device with or without a stipend. Employees subject to legal requests are expected to produce any records that may exist. All communications related to University business should take place on an approved platform as outlined in the Acceptable Use Policy.

VI. POLICY COMPLIANCE

Violations of this policy may subject the violator to removal from the program and disciplinary actions up to or including termination of employment, subject to applicable collective bargaining agreements and may subject the violator to penalties stipulated in applicable state and federal statutes. Sanctions shall be applied consistently to all violators regardless of job titles or level in the organization.

By Direction of the CIO:

Mira Lalovic-Hand,
SVP and Chief Information Officer

Appendix A: Usage & Reimbursement Schedule

Monthly stipends will be provided to approved employees on a biweekly basis through the payroll process. Biweekly reimbursements are calculated on an annualized basis in alignment with standard payroll practices. The parameters for “Rowan Medicine”, “Moderate Usage” and “High Usage” are provided below. Employees must meet one of the previously specified criteria to be eligible for participation in the program.

Reimbursement amounts will be reviewed and potentially adjusted annually on July 1.

	Moderate Usage	**High Usage**	**Rowan Medicine**
Availability	Employee is expected to be available a few nights /weekends and/or is mobile part of the workday.	Employee is expected to be available nights/weekends for critical university business and/or is mobile most of the workday.	Employee provides or supports healthcare services through Rowan Medicine.
Voice (mins. /mo.)	UNDER 120 minutes	OVER 120 minutes	OVER 60 minutes
Txt (per month)	UNDER 200	OVER 200	OVER 100
Data (per month)	UNDER 2GB	OVER 2GB	OVER 1GB
	$24/mo, $288 annually	$64/mo, $768 annually	$35/mo, $420 annually

Reimbursement			