



Florida Agricultural & Mechanical University Board of Trustees Policy

Board of Trustees Policy Number:
2007-02

Date of Adoption/Revision: September 13,
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Subject	Telecommunications Policy
Authority	Section 282.318, F.S., Chapter 815, F.S. Florida Computer Crimes Act, 18 U.S.C., 1030, Fraud and Related Activity in Connection with Computers, <i>16 CFR Part 314</i>
Applicability	

I. Policy Statement and Purpose

The purpose of this policy is to establish uniform rules and regulations for the use and management of voice, video, fax, and cellular services by employees of Florida Agricultural and Mechanical University.

The University incurs significant costs for telephone usage from long distance toll calls, credit card calls, cellular telephone charges, telephone charges reimbursed while on travel status, and for monthly service charges. It is the responsibility of each department to maintain an adequate system of internal control to ensure that calls and telephone related expenses are for official University business.

Wireless telecommunication devices have become common place and are now often necessary for faculty and staff to carry out their responsibilities in an effective and efficient manner. These items are subject to additional scrutiny by the Internal Revenue Service (IRS), in that it requires that a listing of all calls be specifically and properly identified as to their purpose, business or personal.

This policy provides options for the departments with regard to the use of cell phones and other wireless communication devices in an effort to reduce the increased record keeping responsibility imposed by the IRS.

II. Definitions

- A. Stakeholders - Individuals or groups defined as faculty, staff, students, alumni, and community partners.
- B. Business Call- a call that supports or promotes the ongoing missions of the University.
- C. Personal Call- A call that does not qualify as a business call.

- D. Local Call- A toll call for which there is no separately stated charge on the University phone bill issued by the University's telephone service provider.
- E. Long Distance Call- a toll call that does not qualify as a local call for which there is a separately stated charge on the University's telephone bill issued by the telephone service provider or State SunCom provider.
- F. Telephone Services- single and multiple phone lines, local services only, restricted and unrestricted long distance service, calling cards, cellular phones, pages, PDAs, etc.
- G. University Telephone- a telephone paid for by the University, whether on or off campus, purchased to support or promote the ongoing missions of the University.

ACRONYMS

EIT – Enterprise Information Technology

III. Procedures, Approvals/Responsibilities

Chief Information Officer (CIO)

The Chief Information Officer (CIO) is responsible for the implementation of this policy.

Chief Information Security Officer (CISO)

The Chief Information Security Officer reports to the CIO. The CISO has primary responsibility for the oversight of the state of information security at the University and is charged with the definition of security strategy and scope. Primary responsibilities include:

- Drafting of information security policies and procedures.
- Reporting on the state of information security.
- Performing oversight of the security efforts of area managers, security engineers and other security related specialists as appropriate; insuring adherence to operations related security policies and procedures.
- Serving as primary point of contact for auditors during formal audit processes.
- Preparing formal responses and action plans pursuant to internal audits.

- Identifying individuals responsible for security engineering functions outsourced.
- Reviewing operations related to security.
- Performing annual risk assessment based on CobIT 3 standards included by reference and will be complied with except where superseded by University approved procedures.
- Evaluating and adjusting the University information security program in light of its annual risk assessment.
- Providing Security Awareness Training for University employees and students.

University Purchasing Office

The University Purchasing Office has some responsibility related to this policy to include:

- Reviewing of purchasing and contracting operations related security policies.
- Reviewing security strategy and policies through participation in the Chief Information Security Officer reviews and meetings.
- Communicating security policies and requirements to vendors / service providers.
- Obtaining signatures from contract service providers acknowledging their responsibility for nondisclosure of confidential information and adhering to University policies and procedures.
- Taking reasonable steps to select and retain service providers that are capable of maintaining appropriate safeguards for the stakeholders' information at issue.

System Administrator Authority

- System administrative privileges shall be limited to those support personnel requirements for business purposes. Such authority shall be revoked upon determination by CIO that such access is no longer required.
- EIT Services shall be responsible for maintaining a current roster of individuals with administrative access to each supported system or set of systems.

University Employees and Students

- Managers are responsible for ensuring that their staff complies with this policy.
- Managers will include information security as part of their employee orientation.

Local & Long Distance Telephone and Facsimile Usage

Local

University employees are discouraged from using University telephones to make personal local calls and are further discouraged from using University facsimiles for personal local use. Although no direct payment for personal local telephone calls is required, excessive use of University telephones or facsimiles for personal use may result in appropriate disciplinary action.

Long Distance

University employees shall not use University telephones to make personal long distance calls and shall not use University facsimiles for personal long distance use. The University recognizes the occasional need for an employee to do so. However, on such infrequent occasions, if an employee needs to make a personal long distance call, the employee must call collect or charge the call to their home telephone, personal calling card or personal credit card. Employees are further encouraged to seek commercial service providers to meet their personal facsimile or long distance needs.

Long Distance Record Review

The following procedure shall be used to review long distance records:

- 1) Each month, a list of all telephone charges incurred are calculated, and sent electronically to EIT.
- 2) EIT shall process this file and create a list for each department head, by grouping calls that originated from telephones owned by each respective department. This list shall be sent to the telecommunications group.
- 3) The telecommunications group shall review these lists, and specifically note any phone calls that were:
 - i. longer than one hour in duration, and/or
 - ii. occurred after 6:00pm for further review.
- 4) The Telecommunications group shall disseminate these lists to each respective department.
- 5) Each department head shall disseminate the list further to each respective employee.
- 6) Each employee must review all long distance calls, note and discrepancies, and certify by signature that all calls were business related. Any calls which the employee has made but were not business related must be reimbursed by compelling the employee to pay (by

check or money order) for the personal amount used. This is calculated by charging \$.10 for each minute used.

- 7) Employee shall return certified list along with any payments to the telecommunications group.
- 8) Telecommunications group shall ensure and be responsible for collecting employee's certified long distance phone record. Telecommunications group shall keep these lists for audit purposes for a minimum of three (3) yrs.

Long Distance Employee Record Keeping Requirements

Each employee must keep a monthly log of all calls made using their office telephone, using the "Long Distance Record Log" form located in Appendix D.

Cellular Phones Introduction

Cellular telephony can be an effective resource for Florida A&M University to conduct University business when employees are away from their University office. In general, cellular telephones (i.e., telephones connected to a commercial cellular telephone service such as Alltel, NexTel, Verizon, or Cingular, etc.) may be assigned to employees for whom the nature of their work requires wide mobility and simultaneous access to the public telephone network. These situations include providing on-call support after normal University business hours and moving around campus working on University business.

University departments are responsible for choosing cellular telephone rate plans that are the most economical for their department's needs and circumstances. The department should review the monthly bills checking each individual usage and adjust individual cellular plans to assure that the University receives the lowest cost per minute.

Cellular Phones – General Requirements

To obtain cellular telephone service, prior approval from the department head of an employee's section is required. Requests for cellular phone service must be submitted by completing either the "Cellular Service Allowance Request" form, or the "Cellular Service Reimbursement Request" form, depending on which type of plan is selected.

Cellular Phone Plan Options

Departments have the following two options to provide for the business use of cell phones and other wireless communication devices.

Cell phone usage is subject to scrutiny by the Internal Revenue Service (IRS) and other auditors who would look for assurance that the costs incurred for cell phone use are only for

official business use. To support that calls are only for business use the IRS requires that all calls be specifically and properly identified as to their purpose, business or personal. This requirement significantly increases FAMU’s record keeping responsibility.

To reduce administrative costs by negating the requirement to keep detailed logs, an “allowance stipend” approach is currently the preferred method of cell phone acquisition. Alternatively, the reimbursement method is also an option.

Responsibility	Option (A) – Stipend - Preferred	Option (B) – Reimbursement
Phone & Plan Ownership	Purchased and owned by staff, allowance of \$250 is provided	Purchased and owned by University. Must be returned upon termination.
Use Restrictions	May be used for both Business and Personal calls	May only be used for Official Business use. Any personal calls must be reimbursed at a per/minute rate
Monthly Payments	Allowance will be disbursed to a employee on a monthly basis.	University will pay all costs associated with bill. Employee will refund personal calls on a per minute basis.
IRS Record Keeping Requirements	Because the entire University contribution toward the communication device and plan is considered wages to the employee, treated as taxable income, no detailed documentation of personal or business calls is required.	A record of each telephone call must be made, noting whether it was business or personal, record of reimbursement of all personal calls.
Administration		Each supervisor of an employee who is issued a phone must verify employee’s record of calls
Employee	Must keep phone bills	Must submit (Cellular Phone Usage Form A) each month

Stipend Plan Calculations

Initial

There will be an initial stipend allowance of \$250.00 to cover the cost of a new cellular

phone or PDA.

Monthly

The monthly service allowance shall be designated by making a determination as to the position level that an employee belongs to, based on the table below.

Position Level	I	II	III
Employee Group	Executive Management (e.g. Vice President, Associate VP)	Managers (e.g. Directors, Department Heads)	Staff (e.g. Supervisors , Employees)
Monthly Service Allowance	\$150.00	\$100.00	\$65.00

The monthly allowance is determined by the following formula:

E.g. Position Level III
 Monthly Service Allowance \$65.00
 Annual Allowance \$780.00 (Monthly X 12)

The monthly service allowance will most likely not cover the entire monthly phone bill when taxes and other surcharges are calculated, however it is not expected to, because the phone may be used for personal as well as business calls.

17H.405 Reimbursement Plan Requirements

The services paid by the University are to be utilized in the conduct of University business. Personal calls are not allowed, except in emergency circumstances (as determined by the Department Head) or in unpreventable instances (i.e., incoming calls for which charges will be assessed, and the user has no ability to prevent). Employees are responsible for making certain that all cellular calls are business related.

Each month, a copy of the cellular phone bill will be provided to each employee. The employee will review this bill, and complete a "Cellular Phone Reimbursement" Form, as noted in Appendix A. In addition, the cost of any personal calls shall be calculated and payment (by check or money order) shall be submitted to cover the cost.

The employee's supervisor shall review the reimbursement form, taking care to ensure that it covers all calls presented on the cellular phone bill. The supervisor shall not accept the form without an attached payment to cover personal calls, if there are any.

Failure to justify business calls, and/or to complete reimbursement form, shall result in all calls being deemed personal, and an amount calculated to be due. Failure to provide a reimbursement check in a timely manner will result in disciplinary action.

Employees are responsible for any cellular equipment assigned to them, and will be responsible for its use and for safeguarding the instrument. Lost or stolen instruments must be reported immediately to the vendor and to the department head.

Reimbursement for Personal Cellular Service for Business Purposes

Reimbursement to the employee for occasional use of personal cellular telephones to conduct official business will be made only when substantiated by documentation showing that the call was necessarily made for the official business of the University. If the business call made on the employee’s personal cellular telephone does not result in additional charges to the employee, reimbursement for the business call is disallowed. However, if the business call results in additional charges, the employee may be reimbursed up to the per-minute rate charged, plus applicable taxes, for the excess minutes incurred as a result of usage for official University business. Employees will be required to provide a statement certifying that the calls were necessary and were for official University business. No payment will be made for any portion of the employee’s personal monthly charges, taxes on the basic monthly fee, or charges related to obtaining documentation listing individual telephone calls.

If it is necessary for an employee to consistently use his or her personal telephone to conduct the duties and responsibilities of the University, then the University should consider providing use of a cell phone.

17H.407 Employee Responsibilities

- A) The employee is personally responsible for complying with any contract entered into with a communication service provider including payment of all expenses incurred (including long distance, roaming fees, and taxes). In the event that an employee leaves the position, he/she continues to be responsible for the contractual obligations of the cellular service plan.
- B) An employee receiving a University contribution toward the purchase of cellular devices or services must notify his/her department head within five working days of the inactivation of communication service.

Appendix A - Monthly Reimbursement Cellular Phone Record Keeping Requirement

When option “B” is selected, this form must be completed and submitted each month by the employee.

<i>Cellular Phone Reimbursement Form</i>			
		Month Ending	

Employee ID: _____

Email: _____

Purchase Allowance: \$ _____

Monthly Allowance

\$65 \$100 \$150

Start Date

____/____/____

End Date

____/____/____
MM / DD / YY

Employee Type:

- Department Head level position or above
- Key critical situation members (requiring 24/7 contact: i.e. network administrators, police, facilities staff, etc.)
- Field staff (job duties require being out of the office a significant amount of the time)
- Other (please provide justification):

Signatures:

I certify that I have read and understand the FAMU Cellular Wireless Communication Policy. It is my responsibility to report changes or interruptions in service of the device to my department contact. I also affirm that an allowance, other than the one stated above, is not being received from another department or activity affiliated with Florida Agricultural and Mechanical University.

Employee Signature

Date

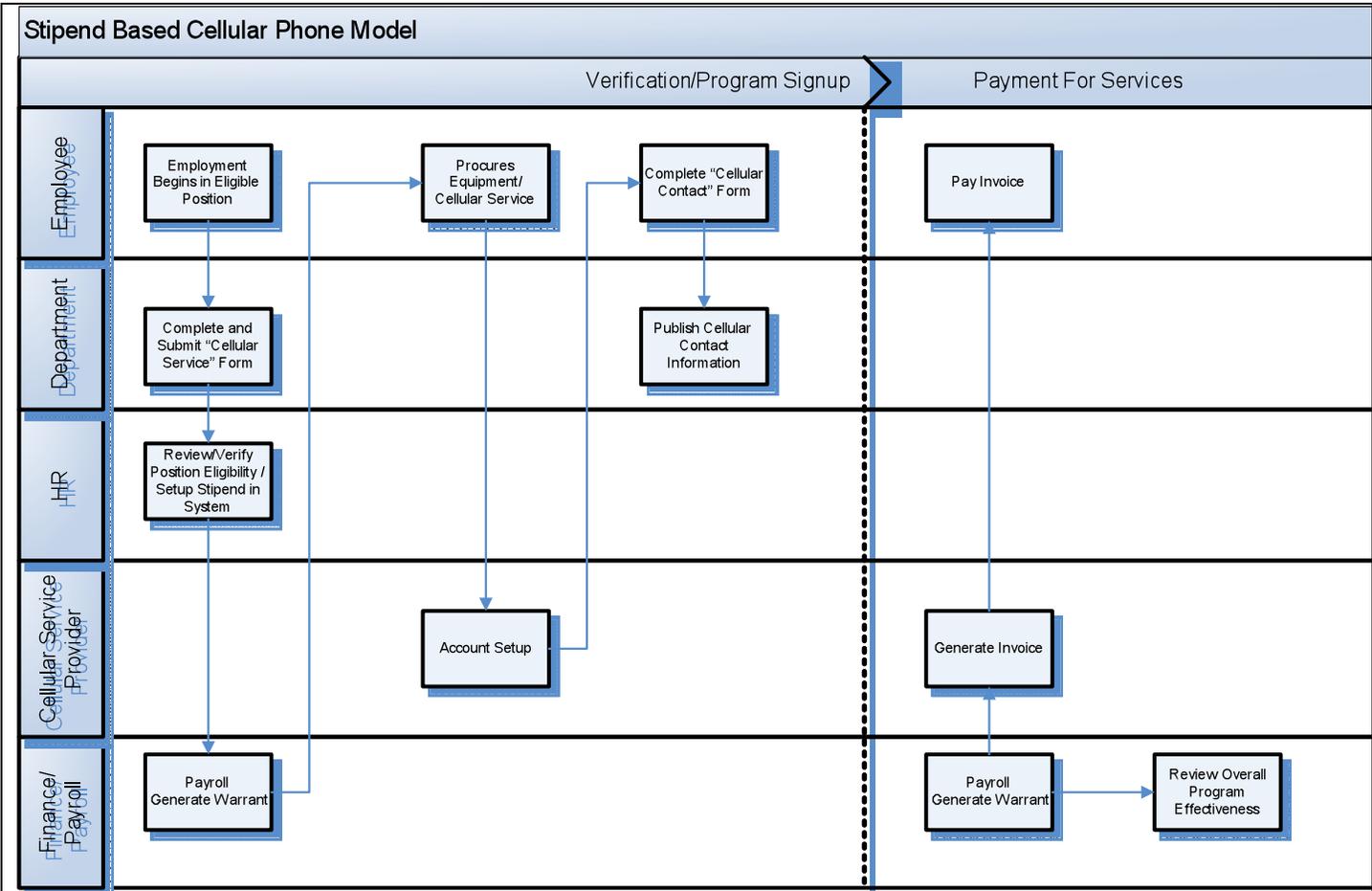
I certify that I have read and understand the FAMU Cellular Wireless Communication Policy. I further certify that use of an employee's cell phone and/or other wireless communications device and allowance amounts are a requirement to fulfill this employee's job duties. I affirm that the allowance requested is appropriate for the level of usage.

Signature of Department Head

Date

Printed Name of Department Head

Appendix C – Stipend Based Model



17H.600 Credentialing**17H.700 Compliance****17H.701 Standards Compliance****17H.702 Enforcement****17H.703 Disciplinary Actions**

- A. Suspected violations of this policy should be reported to the Chief Information Officer and the Information Security Manager.
- B. Individuals who violate this policy will be subject to discipline as appropriate.
- C. The University has primary responsibility and authority for all components of the IT infrastructure. All devices, applications, databases and other components must comply with the university policies.
- D. The University information security cooperates with law enforcement agencies in their efforts to investigate any violation of federal and state laws. If the University suspects the violation of any law, the University may ask campus police or an external law enforcement agency to investigate the matter.
- E. Users reasonably believed by the University to have willfully compromised its information security are subject to investigation, possible prosecution and/or termination/dismissal.
- F. An employee who interferes with or refuses to cooperate in the investigation of violation of this policy will be subject to discipline, possible prosecution and/or termination/dismissal.
- G. A student who interferes with or refuses to cooperate in the investigation of violation of this policy will be subject to discipline, possible prosecution and/or termination/dismissal.
- H. Business units or departments may establish additional procedures that are relevant to their operations providing that these additional procedures:
 - i. Do not conflict with this policy,
 - ii. Provide specific operational detail, and
 - iii. Are more restrictive in security posture.

17H.800 Approvals

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