

HOWARD UNIVERSITY POLICY

Policy Number: Series 700: Information and Technology
Policy Title: 700-004 MOBILE DEVICE STIPEND POLICY
Responsible Officer: Chief Operating Officer
Delegated to: Chief Information Officer, Enterprise Technology Services
Responsible Office: Office of the Chief Operating Officer
Delegated to: Enterprise Technology Services
Effective Date: August 14, 2015
Replaces 700-004 *HU Official Mobile Device Policy*, approved on December 6, 2013

I. POLICY STATEMENT

It is the policy of Howard University (“the University”) to be good stewards of University resources. This policy guides the appropriate utilization of University work-related cellular service through a *Stipend Program for Mobile Devices*. It is intended to allow employees the opportunity to use a single device that supports both their work and personal lives, while minimizing costs incurred by the University for cellular service and phone acquisition.

II. RATIONALE

Howard University recognizes that telecommunications may aid an employee's job performance and the efficiencies of a department by providing immediate accessibility and improving customer service. The employee's department head is responsible for recommending when an employee needs to conduct University business using a cell phone to fulfill his or her job responsibilities. The department's vice president, dean, or delegated designee must approve all such requests.

Eligible employees may receive payment in the form of a monthly cell/smart phone stipend to offset the cost of business-related calls or activity on their personal cell phone or smartphone. The University does not provide cell phone accessories, except for employees who qualify under the Americans with Disabilities (ADA) Act, or activation fees. The cell/smart phone stipend will be included in the employee's paycheck, consistent with IRS regulations.

III. ENTITIES AFFECTED BY THIS POLICY

All Howard University employees with job demands that cannot be conducted on a landline telephone and/or that require accessibility regardless of time or place are eligible for, *but not entitled to*, a monthly stipend for the use of their personal cell devices. Requests for stipends must be approved by the employee's vice president, dean, or delegated designee. The Howard University Hospital (HUH) is not affected by this policy.

Specifically, the University may provide monthly cell phone stipends to employees meeting at least one of the following criteria:

- A. The job duties require considerable time outside of the office and it is important to the University that the employee be immediately accessible to receive and/or make frequent business calls, texts and emails during those times.
- B. The job duties require the employee to be immediately accessible to receive and/or make frequent or immediate business calls, texts and emails outside of working hours.
- C. The job duties require the employee to travel frequently throughout the United States or internationally.

In special cases, employees in essential services, as defined by the University, such as patient care, clinical care, student residential administration, radio and television station operations, information technology, human resources, public safety, university communications, etc., may be eligible to participate in the program even if they do not meet the general eligibility requirements. In such cases, the department's vice president, dean, or delegated designee must approve the request.

Departmental eligibility criteria can be more, *but not less*, restrictive than the University criteria stated above. Such criteria should be in writing and cleared through the offices of the General Counsel and Human Resources to ensure nondiscriminatory actions.

IV. DEFINITIONS

The following definitions apply to this policy:

- A. **Accessories** – Items such as batteries, belt clips and chargers that are sold by cellular carriers and extend and/or enhance utilization of cellular equipment.
- B. **Cell Phone** – A wireless, hand-held electronic device used to make telephone calls and instant text messages across a wide geographic area, which allows the user to be mobile.
- C. **Cellular Equipment** – Any device operating on a cellular network, most notably cellular telephones.
- D. **Cellular Network** – Geographic area divided into “cells” or coverage areas, with each served by base stations that serve to receive and transmit cellular telephone calls.
- E. **Cellular Service** - Activation, use, maintenance, and termination of cellular equipment.
- F. **Cost Center Manager** – Person (or persons) in each department who has (have) signature authority to authorize or approve the expenditure of university funds. For purposes of this policy, this individual has the rank of vice president, dean and/or equivalent designation.

- G. **Early Termination Fees** – Charges applied by carriers for termination of cellular service prior to the contractually assigned date, which is typically one or two years from date of service commencement.
- H. **Encryption** – process of converting data into an unreadable format that is reversible with the use of a security key or password
- I. **Individual Service Plan** – A cellular service plan in which the minute allotment is applied to only one cellular device.
- J. **Landline Telephone** – The device utilized for typical telephone connections or plain old telephone service (POTS).
- K. **Personal or Personal Business Use** – Utilization of University-supplied cellular equipment for any means other than University business.
- L. **Personal Device** – piece of electronic equipment, such as a laptop or a mobile phone, that is small and easy to carry owned by an individual.
- M. **Remote Wipe** – Security feature that allows a system administrator or device owner to send a command to a computing device and delete data.
- N. **Smartphone** – A wireless, mobile electronic device that, in addition to cell phone capability, offers computing ability and connectivity via mobile broadband or WiFi access. Smartphone capabilities may include text messaging, e-mail and Internet access, short range wireless communications, GPS navigation, media applications, and business applications. Examples of smartphones include Blackberries, iPhones, and Droids. Smartphones are typically serviced by smartphone providers and incur charges to the user for computing and connectivity time according to a data plan.
- O. **Stipend** – A cash allowance for work-related use of personally-owned cell phones when used for non-compensatory business reasons consistent with IRS regulations. This treatment does not apply to reimbursement of unusual or excessive expenses or to reimbursement made as a substitute for a portion of the employee's regular wages.
- P. **University Business** –Tasks related to an individual's job duties.

V. POLICY PROCEDURES

A. General Procedures

Employees who require a cell phone to perform University business may, with approval of their vice president, dean, or delegated designee, receive a monthly stipend from the University, within approved limits, for business usage of their personal cell phone. The procedures described in this document must be followed in order to receive a stipend under this program.

NOTE: If the employee currently has a Howard University-provided phone, the phone must be turned in and the service terminated before the employee can receive a stipend under this program. The University will not fund simultaneously a University-issued phone and a stipend for business use of a personal phone.

Stipend eligibility will be determined by the level of service required in the performance of duties.

B. Employee Responsibilities

Employee responsibilities are enumerated in a *Cell Phone Stipend Authorization*. An employee receiving a cell phone stipend must make the personally-owned device available for business use as required by the employee's department during regular business hours; maintain active cell phone service; agree to carry the cell phone; and keep it charged and in operating condition, according to departmental requirements.

The employee agrees to use the phone in a manner consistent with University policy and all applicable local, state and federal laws during regular business hours. Inappropriate or unlawful use of the cell phone and its services or features, such as using camera equipment in restricted areas, is prohibited. Phone misuse will result in immediate cancellation of the *Cell Phone Stipend Authorization*.

Eligible University employees will contract directly with a carrier of their own choosing to establish personal cellular service. Upon doing so, the account is established in the employee's name, invoices are sent directly to the employee's address by the vendor and the employee bears responsibility for payment. The University makes no endorsement of and bears no responsibility for personal cellular service plans.

The employee is responsible for obtaining a phone and monthly plan that, at a minimum, meets the level of service required by the department. The employee owns the telephone, therefore it may be used for personal and business use, but must be available for the performance of work responsibilities as designated by the department. Howard University will not pay for the cost of the cellular device or related accessories and supplies. The employee may obtain a more robust plan if needed for personal use, but will only receive the stipend amount agreed upon for business use. Payment of bills for the cellular plan and device are the sole responsibility of the individual employee, not the department or the University.

An employee who transfers to a new department that is under the direction of a different vice president, dean, or delegated designee, is required to have his or her *Cell Phone Stipend Authorization* reauthorized by the new vice president or dean by following the procedures noted above. If reauthorization is not conducted or approved within a month billing cycle, the stipend will be terminated.

Only one cell phone stipend will be provided per employee. The stipend will be terminated upon employee separation and will coincide with the effective date of the separation.

C. Cell Phone Stipend Amounts

The monthly cell phone stipend amount is based upon four levels, which are defined below:

Level	Description	Maximum Stipend Amount
Cabinet	Cabinet-level employees.	\$200 annual stipend for equipment; \$60 monthly stipend
Frequent Traveler	Frequent traveler whose position requires considerable time outside the office and it is important to the University that the employee be immediately accessible to receive and/or make frequent business calls during those times. Eligibility for this category requires extensive travel throughout the United States and internationally.	\$200 biennial stipend for equipment; \$60 monthly stipend
Executive	Associate/Assistant Vice President whose position requires the employee to be immediately accessible to receive and/or make frequent business calls outside of working hours.	\$60 monthly stipend
Professional	Director-level employee whose position requires the employee to be immediately accessible to receive and/or make frequent business calls outside of working hours. Essential staff are not director-level employees, but have been approved by the vice president, dean, or delegated designee as stipend-eligible based upon job duties that require the employee to be immediately accessible.	\$40 monthly stipend

The stipend will be included in the employee's paycheck. The stipend is not intended to pay the employee's *entire* phone bill, under the assumption that most employees also use their cell phones for personal purposes.

The stipend is not an entitlement. The amount can be changed or withdrawn without notice at any time.

Extraordinary business use of an employee's personal cell phone that results in excessive cost, such as roaming fees during official travel, may be reimbursed with appropriate substantiating documentation and approval. Such requests require a *Travel Expense Reimbursement Request* submitted through the expense reimbursement system to be paid from Accounts Payable.

Starting July 1, 2015 and throughout the first fiscal year of this policy, funding for stipends will originate from Enterprise Technology Services (ETS). Subsequent years, funding will be determined from the departments of origin, and whether the available stipend amounts require adjustment.

NOTE: Cell Phone Stipends are generally not allowed on restricted contract and grant funding.

D. Stipend Guidelines

The employee who is to receive the stipend, and their vice president, dean, or delegated designee must sign a *Cell Phone Stipend Authorization* that justifies the business need for a cell phone; enumerates the employee's responsibilities; and outlines a phone and service plan that meet departmental requirements.

At the time the authorization is signed, and when/if it is renewed each year, the employee receiving the stipend may be asked to provide documentation regarding the current cost of their monthly plan. Notwithstanding the specified allowable stipend rates noted in Section C., employees will not be allowed to receive a stipend that is in excess of their monthly service plan amount.

Stipends are requested by the department by submitting a transaction in PeopleSoft HCM. The signed *Cell Phone Stipend Authorization* and a copy of the employee's most recent cell phone bill must be attached to the transaction submitted by the employee's department in order to initiate a stipend. Reason code "recurring payment" and earnings code "WDR – Wireless Device Reimbursement" are used for the transaction. Submitted transactions that do not include the requested information will not be approved by the Office of Human Resources.

NOTE: Additionally, the employee is responsible for informing the department and the Office of Human Resources when the cell phone account is terminated.

E. Payment of Stipend

The stipend will be paid via the PeopleSoft HCM payroll system. This stipend does not constitute an increase to base pay, and will not be included in the calculation of percentage increases to base pay due to annual raises, job upgrades, etc.

An employer-provided cell phone or a stipend provided for cell phones primarily for non-compensatory business purposes for substantial reasons relating to the employer's business is excludable from the employee's income if the reimbursement is calculated in a manner consistent with IRS regulations.

To satisfy the requirements of Howard University policy, and to meet IRS accountability plan requirements, stipends cannot be made before the cost has been incurred, therefore payment cannot be made in advance. An employee receiving a stipend for their personal cell phone must be able to produce additional documentation concerning their bill, if and when requested.

F. Documentation and Review Requirements

For employees to receive a cell phone or smartphone stipend, a new *Cell Phone Stipend Authorization* must be completed each fiscal year no later than June 15 and approved by the employee's vice president, dean, or delegated designee. Departments will need to reauthorize stipends for the new fiscal year based upon a report from Payroll of all employees who receive cell/smart phone stipends. The Payroll Office will retain approved *Cell Phone Stipend Authorizations* on file and available for internal and external audit.

The employee's supervisor is responsible for an annual review of employee business-related cell phone use to determine if existing cell phone stipends should be continued as-is, changed, or discontinued. It is the employee's supervisor's responsibility to contact the Office of Human Resources by sending an email to HRProcessing@howard.edu to stop the stipend when employees with *Cell Phone Stipend Authorization* leave or change positions within the University. Failure to advise may result in disciplinary action if unwarranted reimbursements are made.

G. Phone Upgrades and Accessories

Eligible employees in the Cabinet and Executive/Frequent Traveler categories are eligible to upgrade their cell or smartphones annually or biennially. Cabinet Officers may receive stipends up to \$200 for a phone upgrade once each fiscal year. Executives/Frequent Travelers may receive stipends up to \$200 for a phone upgrade every other fiscal year. Other approved users are not entitled to receive stipends toward phone upgrades.

Upgrades to basic equipment, such as special cosmetic or technical features, etc., and cell phone use unrelated to business necessity, will not be part of the stipend. However, an employee may choose to pay the difference in their respective stipend level and the cost of a more expensive device or service. Recommendation of a stipend level is made by the employee's supervisor with final approval by the employees' respective vice president or dean.

Requests for reimbursement for phone accessories are not covered and will be denied. If an employee with a stipend travels internationally, the specific cost of business calls

overseas can be deducted on his or her travel expense report. International data charges in excess of the stipend will be reimbursed only with proper documentation demonstrating business use and will be paid through the Accounts Payable process via a travel expense report.

H. Use of Phone

Due to their portability, cell phones and smartphones are particularly susceptible to theft or loss. Participating employees should use reasonable care to protect cell phones and smartphones, and avoid accessing or storing confidential data, as defined in *University Acceptable Use of University Information Resources, Data, and Communication Policy*, on such devices. Employees who access University data using cell phones or smartphones must secure such devices with a password. Employees should refer to the *Mobile Device Management Policy* for guidance.

Use of the phone in any manner contrary to local, state, or federal laws constitutes misuse, and will result in immediate termination of the cell phone reimbursement. In the event of litigation, the rules of civil procedure may require the employee to save any data about potential litigation that is stored on a personal digital assistant, including all mobile devices, whether or not the device is associated with a *Cell Phone Stipend Authorization*.

I. Fees for Contract Changes or Cancellations

Cell phone and smartphone stipends will terminate upon an individual's separation of service with the University. As the individual is the owner of the device and the voice and/or data plan associated with the device, the individual will remain personally responsible for all associated costs and charges previously covered by the reimbursement(s).

J. Infrequent Use of Cell Phones for Business Purposes

If a University employee's job duties do not include the frequent need for a cell phone, the employee is not eligible for a stipend. Such employees may request reimbursement for the actual extra expenses of business-related cell phone usage. Reimbursement for per-minute "air time" charges is limited to the total overage charge shown on an invoice, i.e., expenses for minutes included in the plan will not be reimbursed. In this case, an employee should make a personal payment to the provider, and then submit a request for reimbursement. Cell phone charges that result from official overseas business travel should be included as part of the normal travel reimbursement. Such requests are submitted via the Accounts Payable process in Concur.

K. Non-Individually Assigned Phones (Floaters)

Certain departments may require the use of cell phones which are not assigned to individuals. The University may provide these devices, subject to ETS approval and

administration; the requesting department will incur associated charges. These devices must not be assigned to individual employees and shared among employees on a day-to-day basis.

L. Use of Cellular Service in Cost Centers Funded by Externally-Funded Sponsored Agreements (Grants and Contracts)

Cellular equipment and services are generally not allowable charges on sponsored agreements. In certain circumstances, however, they may be charged against such cost centers consistent with the regulations and guidelines associated with the award. At a minimum, these items must be specified in the budget and approved by the sponsor. In addition, prior internal approval is required by Research Administration Services. Principal investigators and administrators should consult with Research Administration Services for guidance.

M. Transition from Howard University-Issued Phones

Upon execution of this policy, employees will be notified that service on all Howard University-issued phones will be terminated, and informed that a current user of a Howard University-issued phone may purchase the device after contacting cell-transition@howard.edu to obtain a price quote for the phone. The employee may then purchase the device by either agreeing to a temporary stipend reduction, if participating in the *Stipend Program for Mobile Devices*, until the quoted price of the device is met or by issuing a check for the quoted price. In cases where the purchased phone is not owned by the former user, phones will be wiped for security purposes by ETS prior to sale.

Howard University-issued cell phones NOT being acquired by the employee must be returned to ETS by visiting the iLab at Wonder Plaza.

A current user of a Howard University-issued phone number may be transferred to a personal service. Charges incurred before the transfer are complete may trigger a temporary stipend reduction if participating in the *Stipend Program for Mobile Devices*.

VI. INTERIM POLICIES

There are no interim policies. This policy replaces *700-004 HU Official Mobile Device Policy*, approved on December 6, 2013.

VII. SANCTIONS

Howard University will address reports of misuse or abuse of information and technology resources in accordance with existing policies and procedures. Sanctions will be determined on a

case-by-case basis according to the circumstances of the misuse/abuse. Appropriate sanctions may be determined by the Office of Human Resources, a dean or departmental manager, the Office of the General Counsel, and/or appropriate law enforcement agencies.

VIII. HYPERLINKS

Howard University Policy website: www.howard.edu/policy

Other related policies:

[*700-002 Acceptable Use of University Information Resources, Data and Communication Services Policy*](#)

[*700-005: Mobile Device Management \(MDM\) Policy*](#)