



# Mobile Communication Devices

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## POLICY STATEMENT

The university will accommodate those full- and part-time employees with valid business needs for mobile communication devices by issuing university-owned mobile communication devices. A university device must be authorized by a dean or vice president, and must be purchased and serviced under the university's corporate account program managed by Cornell Procurement Services. Personal devices used for business will not be subsidized by the university.

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## REASON FOR POLICY

The university is committed to providing essential, business-related tools for faculty and staff in a manner that promotes the proper stewardship of assets and establishes a framework for consistent decision-making. While recognizing that properly used mobile communication devices facilitate university business, the university must manage the costs, risks, and administrative burden associated with such use.

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## ENTITIES AFFECTED BY THIS POLICY

- Ithaca campus units of the university (including Cornell NYC Tech)

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## WHO SHOULD READ THIS POLICY

- All faculty and staff members

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## WEB ADDRESS FOR THIS POLICY

- This policy: [www.dfa.cornell.edu/policy/policies/mobile-communication-devices](http://www.dfa.cornell.edu/policy/policies/mobile-communication-devices)
- University Policy Office: [policy.cornell.edu](http://policy.cornell.edu)

**POLICY 3.24**  
**Mobile Communication Devices**

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## RELATED RESOURCES

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### University Policies and Documents

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[University Policy 3.2, Travel Expenses](#)  
[University Policy 3.6, Financial Irregularities, Reporting and Investigation](#)  
[University Policy 3.14, Business Expenses](#)  
[University Policy 3.18, Charging Directly to Sponsored Projects Costs that are Normally Considered Indirect](#)  
[University Policy 3.19, Telephone Usage](#)  
[University Policy 3.25, Procurement of Goods and Services](#)  
[University Policy 4.6, Standards of Ethical Conduct](#)  
[University Policy 4.7, Retention of University Records](#)  
[University Policy 4.12, Data Stewardship and Custodianship](#)  
[University Policy 5.4.1, Security of Information Technology Resources](#)  
[University Policy 5.10, Information Security](#)  
[University Policy 6.6.13, Flexibility in the Workplace](#)  
[University Policy 8.2, Inclement Weather](#)  
[University Policy 8.3, Emergency Planning](#)  
[Cell Phone Purchases Information](#)

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### University Forms and Systems

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<i><b>Name</b></i>	<i><b>Description</b></i>
<a href="#">Cornell Cellphone Information Guide and Request Form</a>	Use this site to order university-owned mobile devices.

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## CONTACTS

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Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the following offices.

*Contacts, Ithaca Campus Units*

<b>Subject</b>	<b>Contact</b>	<b>Telephone</b>	<b>Email/Web Address</b>
<b>Policy Clarification</b>	University Controller	(607) 255-6240	<a href="mailto:controller@cornell.edu">controller@cornell.edu</a>
<b>My Extension Everywhere Service</b>	IT Services		<a href="http://it.cornell.edu/myext">it.cornell.edu/myext</a>
<b>Report a Financial Irregularity</b>	Cornell Hotline	(866) 384-4277 (toll-free)	<a href="http://www.hotline.cornell.edu">www.hotline.cornell.edu</a>
	University Audit Office	(607) 255-9300	
<b>Telephone Information</b>	Procurement and Payment Services	(607) 255-3804	<a href="mailto:procurement@cornell.edu">procurement@cornell.edu</a> <a href="http://www.dfa.cornell.edu/procurement/buyers/commodities/cellphones">www.dfa.cornell.edu/procurement/buyers/commodities/cellphones</a>
<b>Using Sponsored Funds to Pay for Mobile Communication Devices</b>	Sponsored Financial Services	(607) 255-5085	<a href="mailto:sfs-help@cornell.edu">sfs-help@cornell.edu</a>

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## DEFINITIONS

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These definitions apply to terms as they are used in this policy.

<b>Business Call</b>	A telephone call related to the ongoing missions of the university.
<b><i>De Minimis</i></b>	Trivial; insignificant.
<b>Emergency Situation</b>	A situation when there is a significant, imminent risk to public security and/or university property, or an officially declared campus emergency.
<b>Mobile Communication Device</b>	A communication device that is portable, designed to be carried by a person to conduct business communication activities, and equipped with a cellular plan.
<b>Personal Call</b>	A call that does not qualify as a business call.
<b>Valid Business Need</b>	In accordance with position-related requirements, the need to be readily accessible for contact with the public or with university faculty, staff, or students, coupled with the impracticability of a regular landline telephone for required or essential business needs due to one of the following: <ul style="list-style-type: none"><li>• Frequent and regular travel, with a travel plan, as part of job responsibilities.</li><li>• Working permanently at a location where a landline is unavailable or impractical.</li><li>• Frequently out of landline contact during business hours.</li><li>• The need to receive or initiate communication in emergencies.</li><li>• The need to be accessible and available during non-business hours or by electronic means at all times.</li></ul>

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## RESPONSIBILITIES

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The major responsibilities each party has in connection with this policy are as follows:

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<b>Business Service Center (BSC)</b>	Initiate final approval for all cellular request forms, confirming that the accounting is valid and correct for each approved device. Ensure that units have gone through all required annual certification processes. Retain records containing all cellular request forms and annual certifications supporting ongoing qualification for each employee. Report policy abuses to the University Audit Office, as appropriate.
<b>Cornell Procurement and Payment Services</b>	Negotiate contracts with cellular carriers for all university-owned mobile communication devices.
<b>Dean or Vice President ("Authorizing Agent")</b>	Authorize university-owned mobile communication devices only for faculty and staff members who have a valid business need for their use. Address situations where university-owned devices are used in violation of this policy, notifying University Audit, as appropriate.
<b>Individual</b>	Submit requests for university-owned devices using the online Cellular Request Form (see Related Resources). Use university-owned devices only for business purposes, except for <i>de minimis</i> personal use.
<b>Unit Management</b>	Approve reimbursements for job-related use of personally owned mobile communication devices when required by law. Verify a valid business need and obtain approval from the dean or vice president for all university-owned mobile communication devices under his or her purview (see Definitions). Approve requests submitted through cellular request forms, if appropriate and approved by the dean or vice president. Re-verify annually the valid business need for all university-owned mobile communication devices under his or her purview. Address employee non-compliance with this policy, notifying University Audit, as appropriate.

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## PRINCIPLES

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### Overview

The use of a university-owned mobile communication device by an employee of the university is for the benefit of the university in the furtherance of its mission as determined by a dean or vice president, rather than for the convenience of the employee.

To be eligible for consideration of a university-owned mobile communication device, an individual must be a full- or part-time employee, and must have a valid business need, which is defined as the need to be readily accessible for contact with the public or with university faculty, staff, or students for required or essential business communication needs due to one of the following:

- Frequent and regular travel, with a travel plan, as part of job responsibilities
- Working permanently at a location where a landline is unavailable or impractical
- Frequently out of landline contact during business hours
- The need to receive or initiate communication in emergencies
- The need to be accessible and available during non-business hours or by electronic means at all times

Employees are expected to conduct university business on devices purchased and maintained by the university. Only *de minimis* personal use of a university-owned device is permitted. These devices are the property of the university and, as such, must be returned to the university upon the employee's departure from the unit unless the device is transferred to a personal account with the service provider.

### Unit Responsibilities

Deans and vice presidents are expected to minimize the number of university-owned mobile communication devices in use in their units. In addition, unit management is responsible for addressing patterns of personal use that interfere with work performance.

When a university-owned mobile communication device is approved in accordance with this policy, units are encouraged to consider the practicality of eliminating the university landlines for these individuals, through the IT program My Extension Everywhere (see Contacts).

◆**Note:** It may be prudent for units to consider purchasing unit-assigned devices to be checked out by individuals as needed, as alternatives to individually assigned university-owned devices.

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#### PRINCIPLES, continued

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Units will bear the cost, via a per-line monthly fee, for a consultant hired by the university to manage the university-owned mobile device program.

◆**Note:** A personally owned mobile communication device may not be disseminated as the official contact phone for a Cornell unit or service, nor may it act as the sole university contact phone number associated with a staff title. However, as required for normal business purposes, forwarding calls received at university-owned telephones associated with units, services, or titles to personally owned mobile communication device numbers is allowed. For Ithaca campus units, CIT has technology, called My Extension Everywhere, that allows departments to have a primary Cornell number (607-253, 254, 255) bridged to ring a mobile communication device.

#### **Reimbursement for Business Use of Personally Owned Mobile Communication Devices**

Except when required by law, the university does not pay for or reimburse employees for business use of personally owned mobile communication devices.

#### **Reimbursement of Costs During Travel**

The university may reimburse incremental costs associated with personally owned mobile communication device usage during university travel. For more information, see [University Policy 3.2, Travel Expenses](#).

#### **Home Internet**

Except when required by law, the university does not pay for or reimburse employees for business use of home Internet services.

#### **Change in Job Responsibilities or Separation**

University-owned devices are the property of the university. When issuance of a university-owned mobile communication device is discontinued, such as upon separation from university service or a change in job responsibilities, an employee is required to return the device(s) to his or her unit unless the device is transferred to a personal account with the service provider.

#### **Qualifications for Sponsored Projects Communication Devices**

The federal government and university policies state that monthly telephone charges are a normally indirect charges. To charge such costs directly to an award, "unlike circumstances" must exist, proper approval is required, and allocability of the cost to the project must be demonstrated. Where a device qualifies under this policy for



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#### PRINCIPLES, continued

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acquisition, the following circumstances may qualify a unit to charge these costs to a sponsored award or federal appropriation:

Grant or contract language stipulating that university principal investigator, other research personnel or instrumentation need such connectivity devices during the course of carrying out the project requirements;

- The need for a communication device must have been documented in the grant proposal and budget justification during the grant submission process;
- The Office of Sponsored Programs must have concurred in the determination of “unlike circumstances”; and
- The sponsor must approve (or not specifically disapprove) this expense as a direct charge on the grant. The use of the communication device would be fully devoted to and for the sole use in the project, necessary for the project, and included in the approved budget. In such a case, the principal investigator would need to ensure that the monthly recurring charges and the communication device are clearly identified as part of the initial budget request.

◆**Note:** There may be additional restrictions or audit requirements on the use of sponsored funds to pay for communication device services. Contact Sponsored Financial Services or your grant administrator for additional information.

#### **Department of Athletics and Physical Education**

Employees within the Department of Athletics and Physical Education (A&PE) may be required to submit personal phone records for documentation or review of compliance with NCAA regulations. A&PE employees should refer to the A&PE compliance officer or the business service center for specific requirements.

#### **Preserving Information on Mobile Communication Devices**

Pursuant to federal law, whenever Cornell is sued or reasonably anticipates that litigation may be commenced, it must take actions to preserve all electronically stored information that may be relevant to the claim. This requires Cornell to suspend the deletion, overriding, or any other destruction of electronic information relevant to the dispute that is under the control of the university. This includes all forms of electronic communications – e.g., email, word processing, calendars, voice messages, videos, photographs, etc., wherever it is stored, including on a mobile communication device such as a smart phone. This electronic information must be preserved so that it can be retrieved – if necessary – at a later time in connection with the lawsuit. Consequently, mobile communication devices used to conduct university business, whether owned by the university or the individual, may be subject to these preservation rules.

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#### **PRINCIPLES, continued**

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#### **Security of Information and Devices**

The university standard for security of devices and information includes personally or university-owned mobile communication devices. This is especially important for those employees that receive or use sensitive, restricted, or protected information. For more information, see [University Policy 5.4.1, Security of Information Technology Resources](#), and [University Policy 5.10, Information Security](#).

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## PROCEDURES

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◆**Note:** All university-owned mobile communication devices authorized for employees must be purchased and serviced under the university's corporate account program.

#### **Individual**

1. Submit requests for university-owned devices using the online Cellular Request Form (see Related Resources).
2. Use university-owned devices only for business purposes, except for *de minimis* personal use.

#### **Unit Management**

1. Determine which staff members have a valid business need for a mobile communication device.
2. Approve cellular request forms submitted by individuals, if appropriate, after obtaining approval from the dean or vice president (the "authorizing agent").
3. When a device is no longer needed, whether as a result of a personnel change or de-authorization, notify the business service center (BSC).

#### **Authorizing Agent**

1. Review requests for mobile communication devices, and approve as appropriate.
2. Perform (or designate an individual to perform) periodic reviews to confirm the valid business need for all holders of university-owned mobile communication devices.

#### **Change in Job Responsibilities**

1. If a staff member transfers from one position to another, he or she must return the device and follow the procedures above to obtain a new device.
2. When a device is no longer needed, whether as a result of a personnel change or de-authorization, unit management must notify the BSC.

#### **Business Service Center (BSC)**

1. Initiate final approval for all cellular request forms, confirming that the accounting is valid and correct for each approved device.
2. Manage annual certification processes for all units.
3. Retain records of all approved cellular request forms and annual certifications supporting ongoing qualification for each employee.

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