TELEPHONE/WIRELESS COMMUNICATION USAGE

Policy Statement

The university provides telephone and wireless communications services for faculty and staff in support of mission-related activities and to promote the cost-effective, appropriate and secure use of those devices.

Reason for Policy

The purpose of this policy is to promote the responsible use of telephones and wireless communications devices, and to provide guidance for the use of such devices in compliance with federal regulations.

While the university provides telephones and wireless communications devices, and permits the purchase of wireless service to further the university’s mission, it also desires that use of these devices be cost-effective and properly managed. This policy details responsibilities of both employees and departments with regard to use of telephones and wireless communications devices.

Who is Governed by this Policy

Faculty, staff, and contractors

Table of Contents

Policy Statement ................................................................................................................................. 1
Reason for Policy ................................................................................................................................. 1
Who is Governed by this Policy ........................................................................................................ 1
Table of Contents ............................................................................................................................... 1
Policy

The university provides telephone and wireless communications services for faculty and staff in support of mission-related activities. Telephone and wireless communications usage should be based upon cost-effective practices that support the university’s mission and comply with government rules and regulations.

I. NON-WIRELESS TELEPHONE USAGE

A. Local Calls
Departmental managers are responsible for addressing excessive personal use that would create inequitable personnel practices or expose the university to violating governmental regulations.

B. Long-distance Calls
Individuals are expected to pay directly (e.g., through the use of personal prepaid calling cards, credit cards, operator-assistance, etc.) for all personal long-distance calls made on university telephones unless a departmental process for reimbursement of calls is in place.

C. Telephone Systems and Security
In many instances, voice networks and systems are subject to threats and vulnerabilities. “Phreakers” and other hackers use a variety of methods to eavesdrop on communications, causing denial of service attacks and expensive toll charges (toll fraud). To minimize the risk of these adverse events:

- Supervisors should immediately deactivate accounts for terminated personnel.
- Members of the university community shall not improperly access voicemail messages outside of their own individual account(s).
- Members of the university community shall not illegally intercept telecommunication signals or conversations.
Access to switch and wiring closets shall be restricted to authorized individuals who require access to perform their job function.

Each legitimate telephone end user shall set a strong password for their voicemail accounts and change their password regularly.

Phone users shall not disclose telephone account passwords or their individual access accounts to anyone for any reason.

Voicemail greetings shall not be recorded in such a way that will allow an operator to accept collect or third party billing telephone calls.

II. WIRELESS COMMUNICATION DEVICE USAGE

Handheld wireless devices (including cell phones) are an effective resource for the university because they enable communication in areas or situations where use of conventionally wired telephones is not available or is impractical. In general, wireless communication devices may be assigned to employees for whom the nature of their work requires wide mobility and simultaneous access to public and private voice and data networks.

Departments are responsible for establishing departmental acquisition, monitoring and payment policies and procedures pertaining to wireless communication service to include the criteria contained within the university-wide policy.

A. Acquisition and Maintenance of Service

The university contracts with wireless telephone and communications providers that have been approved by the Procurement Department to provide service and equipment to university departments.

*The wireless billing plan must be commensurate with the business needs of the department.*

**Wireless service and equipment must be obtained directly from authorized university wireless service suppliers, utilizing the contracts in place.** Requests to secure service contracts from vendors other than those having contracts with the university must be submitted to the Procurement Department for approval.

Departments have the responsibility to maintain all wireless service activation and individual plan descriptions in a central location available for an audit review.
All costs associated with wireless communication devices are the responsibility of the department ordering the service. These costs include, but are not limited to: equipment acquisition, service initiation, monthly fees, per-minute cost of calls in excess of the calling plan allocation, accessories, maintenance and repair of equipment, and replacement of lost or stolen equipment.

Departments ordering the wireless service are responsible for coordinating the repair or replacement of the equipment, reviewing individual employee’s wireless bills on a monthly basis, making adjustments to the employee’s wireless plan based on usage to obtain optimal cost savings, payment of invoices on a timely basis to avoid late payment charges, and obtaining and processing payments from employees for personal calls based on university and departmental guidelines.

B. Oversight
Use of wireless communications devices is subject to all rules and regulations regarding utilization of university-provided facilities.

The Procurement Department may review individual and or department usage and suggest plans to assure that the most appropriate rate plan is in use and to screen for possible abuse. The information will then be forwarded to the department head for administrative review and response.

C. Usage
Use of a university-owned wireless communications device and airtime service is intended for official university business. However, the university recognizes that personal calls are sometimes necessary. If any personal calls made or received on the departmental wireless device result in an additional charge on the final monthly bill, the cost should be reimbursed on a monthly basis and the money deposited to the department’s account.

Reimbursement for wireless communication charges related to university business but incurred on employee-owned wireless plans shall be made to employees on the university reimbursement application provided appropriate documentation and “call detail” is provided. Expenses claimed for business use of personal wireless service shall be subject to approval by the department head and allowed only when necessary to conduct work-related business on a non-routine basis.

D. Security and Conduct
The end user should exercise discretion as to who has access to his/her cell phone number as there could be a charge associated with the telephone use regardless of whether the communication is incoming or outgoing.

University employees have an obligation to use their wireless communications services in a responsible, informed and safe manner; conforming to network
etiquette, customs, courtesies, safety practices and any applicable laws or regulations.

Employees using wireless communications devices are responsible for securing them at all times. All losses shall be reported immediately to the designated departmental representative. Employees may be held liable for lost, stolen or damaged university-owned wireless communications equipment.

Wireless communications are not secure and employees should use discretion in relaying confidential information on wireless communication devices.

III. Other Restrictions (Wireless and Non-wireless)

A. Sponsored Projects
Significant portions of the university’s operations are either charged directly or indirectly to sponsored projects. Government regulations prohibit non-mission-related costs from either being charged directly or allocated indirectly to sponsored projects. Office of Management and Budget Circular A-21 states that “costs of goods or services for personal use of the institution’s employees are unallowable regardless of whether the cost is reported as taxable income to the employee.” Thus, personal business should not be conducted using wireless communications services that are either paid directly from or allocated to a federal contract or grant.

B. Operator Assisted Calling
Employees should avoid “operator assisted” calls such as person-to-person, credit cards calls, directory assistance or any other calls requiring the service of an operator, while using a university-provided wireless telephone.

C. Motor Vehicle Laws
Many states and the District of Columbia have enacted laws that prohibit the operation of a motor vehicle on a public highway while using a wireless telephone. Be familiar with and abide by state laws regarding wireless phone use.

Definitions

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Authorized Cellular Supplier</td>
<td>A vendor of cellular telephone service that has Service been approved by the university Procurement Department for official business use and/or agreements.</td>
</tr>
<tr>
<td>Business Call/Use</td>
<td>A call that fosters or supports the ongoing missions of the university.</td>
</tr>
</tbody>
</table>
Wireless Communications Device
A type of short-wave telecommunication device in which a subscriber has a wireless connection from a mobile device to a nearby transmitter. This includes, but is not limited to, cellular (cell) phones and smartphones.

Personal Call/Use
A call that does not qualify as a business call.

Local Call
A call for which there is no separately identified charge on the university telephone bill issued by the Department of Information Technology.

Long-distance call
A call that is separately identified under an individual’s long distance access code.

University Telephone
A telephone paid for by the university, whether on or off campus, purchased to foster or support the ongoing missions of the university.

Related Information
- Acceptable Use Policy for Computing Systems and Services
- Laptop Computer and Small Electronics Theft Policy
- Expense Reimbursement Form

Contacts

<table>
<thead>
<tr>
<th>Contact</th>
<th>Telephone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Procurement</td>
<td>202-994-2500</td>
<td><a href="mailto:procure@gwu.edu">procure@gwu.edu</a></td>
</tr>
<tr>
<td>IT Support Center</td>
<td>202-994-4948</td>
<td><a href="mailto:ithelp@gwu.edu">ithelp@gwu.edu</a></td>
</tr>
</tbody>
</table>

Document History

- **Last Reviewed Date:** April 4, 2017
- **Last Revised Date:** January 27, 2006
Who Approved This Policy

Louis H. Katz, Executive Vice President and Treasurer
Steven Lerman, Provost and Executive Vice President for Academic Affairs
Beth Nolan, Senior Vice President and General Counsel

This policy, as well as all university policies, are located on the Office of Compliance and Privacy’s home page.