

# Personal Communication Device

## University Operations – Information Security

### CWU Policy 204-10

**Effective:** March 2009

**Policy Review Date:** YEAR

**Policy Executive:** Chief of Staff

**Responsible Office/Unit:** Information Services and Security

#### **Policy Statement:**

#### **Applicability:**

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#### **Content:**

Policy

Appendix A - Personal Communication Device Procedure

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#### **(1) Introduction**

- A. Central Washington University is committed to providing essential, business-related tools and services to its faculty and staff in a manner which promotes the proper stewardship of assets; complies with IRS, federal, state and university regulatory requirements; establishes a framework for consistent decision-making; and reduces or eliminates administrative costs whenever possible. Cellular phones and cellular data services offer efficiency for University employees having legitimate business needs for this technology. This policy applies to wireless devices used for voice communication. Wireless devices used for text, data, or e-mail communication are not addressed by this policy unless such devices are also used for voice communication.

#### **(2) Purchase and Use of a Personal Communication Device for University Business**

- A. When it is more efficient or when official business cannot be accommodated by the use of a landline telephone, pager, or other communication device, use of a personal communication device is permitted. In such circumstances, appointing authorities and supervisors will determine the communication needs of their employees.
- B. *The use of a personal communication device by an employee for University business is for the benefit of the University in the furtherance of its mission, not for the convenience of the employee. A personal communication device will be provided only to an employee who is asked by his or her supervisor to carry such a device. An employee may not self-determine that a device is required.*

C. A “valid business need” is defined as follows:

1. 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:
2. Frequent travel, working at a remote location, etc.
3. The need to receive or initiate communication in emergency situations
4. The need to be accessible and available during working hours (when away from assigned land-line telephone) or during non-business hours by electronic means at all times.
5. Departments have three options when requiring an employee to carry a personal communication device in order to perform his/her duties:
  - a. Assign a University-owned device.
  - b. Authorize an allowance to cover the costs related to the employee’s purchase of a personal access plan and personal communication device to utilize that device for both personal and business purposes.
  - c. Authorize reimbursement for employees who have occasional minimal use of a personal communication device for business purposes.

### **(3) Purchase and Use of a Personal Communication Device funded by Grants or Contracts**

- A. Personal communication devices may be purchased and used for a sponsored project/grant or contract when the sponsored project/grant or contract language stipulates that the principle investigators, other research personnel, or instrumentation, need such connectivity devices to carrying out the sponsored project/grant or contract requirements. In this case, the need for a communication device must be documented in the grant proposal and budget justification during the grant submission process, and the sponsor must approve (or not specifically disapprove) the expense as a direct charge on the grant. The principal investigator must ensure that monthly reoccurring charges are clearly identified as part of the initial budget request and must document usage during performance of the project/grant or contract.

### **(4) Applicable laws and ordinances**

- A. Employees must observe applicable laws or ordinances regarding the use of personal communication devices while driving.
- B. See Appendix A for procedures related to purchase and use of personal communication devices for University business or sponsored project/grant or contract purposes.

### **History:**

*03/2009; Responsibility: AVP of ISS; Authority: BOT/ Cabinet; Review/Endorsed by: President’s Cabinet; Review/Effective Date: 03/2009; Authorized by: James L. Gaudino, President  
Reformatted and Assigned new Policy Number - Previous Policy CWUP 2-50-090, June 2025  
Attached Procedure CWUR 7-60-040 as Appendix A, June 2025*

## Appendix A - Personal Communication Device Procedure

(1) Central Washington University's Personal Communication Device policy (CWU 204-10) provides for the purchase and use of a personal communication device for university business when it is more efficient or when official business cannot be accommodated by the use of a landline telephone, pager or other communication device. A personal communication device may only be authorized to fulfill a valid business need.

### (2) Limitation of Responsibility

A. The Information Technology Services (ITS) Department is responsible for enabling mobile email access and the integration of email with the Personal Communication Device (PCD) whether it is a CWU owned device or personally owned device. In the event that providing or repairing email service requires a factory reset of the PCD, the ITS department is not responsible for replacing or reestablishing any application they have downloaded, and for reconfiguring the PCD to any user specific customizations or setting preferences.

### (3) University-owned personal communication devices used for university business

- A. Supervisors and appointing authorities may provide a university-owned device to a full-time or part-time employee (including students) with a valid business need. Since university-owned devices are fully funded with university dollars, their usage is restricted to university business use only.
- B. Employees who are assigned a university-owned device agree to adhere to the Personal Communication Device policy (CWU 204-10) and [the Acceptable and Ethical Use of University Information Technology policy \(CWU 701-07\)](#).
- C. The approving department will be responsible for all costs associated with the device, the cost and contractual obligations of the service plan, and any central costs associated with plans providing direct connectivity to mobile technology services.
- D. All costs associated with a university-provided personal communication device will be billed through the ITS department in accordance with university and ITS guidelines and procedures. Such devices remain the property of the university and must be immediately surrendered to the department upon request of the supervisor or appointing authority. Departmental service is immediately terminated upon cessation of the department need by notifying the ITS department.
- E. Appropriate form: Personal Communication Device Agreement (PCDA)

### (4) Employee-owned personal communication devices used for university business

- A. Departments may authorize an allowance related to the employee's service plan to utilize for both personal and business purposes. An employee must first meet the eligibility guidelines of section 3-20-122(1) to qualify for this option.
  - 1. Devices: The cost of any employee-owned personal communication device is the responsibility of the requester.
  - 2. Service Plans and Allowances: The employee's immediate supervisor and appointing authority will determine the appropriate service plan and allowance schedule to meet the

business communication needs of the university. Qualified employees, who are not approved for an allowance by their supervisor, may still request approval to actively sync their CWU email to their personal communication device (enhanced services) with no monthly allowance.

3. The allowance schedule will be reviewed in January of each year, and may be changed to reflect industry rate changes. Employees who desire a more robust and feature rich plan for their personal usage are responsible for their share of the base plan, and all costs associated with the additional services and features. By June 15 of each year, appointing authorities will be required to confirm that all personnel under their authority who receive an allowance are authorized to continue to receive the allowance for the upcoming fiscal year.
4. Any business usage of personally-owned communication devices makes the records for that subject to public records requests and may be disclosed under the state of Washington public records laws (RCW 42.56).

B. Plan options fall into one of the following four service categories and allowance levels:

1. 1. Voice Only Service: This service level provides voice (phone) communication. No data plan is included for access to the Internet, data services, etc. Allowance: \$30/month\*
2. Data Only Service: This service level provides data features only (including text messaging), for access to the Internet, etc. Allowance: \$30/month\*
3. Voice and Data Service: This service level includes the features and services of the voice-only plan, and includes data service for Internet access and other data features (including text messaging) provided by the service provider. Allowance: \$60/month\*
4. Actively Sync with CWU Email: (no allowance)
5. \* The service to actively sync allows direct connectivity to CWU's email/communication services (other than via a browser). If this level of service is required, the employee's department is responsible for payment of all setup/initialization and annual fees associated with the ITS department to provide connectivity. Annual costs associated with these services are:

- a. University Devices - \$60.00/Year
- b. Personal Devices - \$120.00/Year

C. Payment of Monthly Personal Communication Device Allowance: An allowance is based on a monthly schedule as developed and approved by the university, and will be distributed to the employee on a semi-monthly schedule as an addition to the employee's paycheck. The department requesting the payment of the allowance is responsible for processing the appropriate paperwork. Allowances are not subject to payroll tax withholdings, and do not qualify as compensation for retirement contribution purposes. The allowance does not constitute an increase in base pay, nor will the allowance be included in any percentage calculations for increase to base pay or establishment of base pay related benefits. The allowance may be changed and/or withdrawn by the university at any time. The allowance will only be paid for the months an employee maintains an appropriate level of service. The employee is responsible to immediately inform his/her supervisor of any lapse of service.

1. Appropriate forms: Personal Communication Device Agreement (PCDA)  
Personal Action form

D. Special Circumstances Affecting Allowances:

1. Leave Without Pay (LWOP): An employee receiving an allowance is not eligible for the allowance during periods of LWOP resulting in the employee being paid for less than 80 hours of work or compensated leave during a pay period.
2. Cyclic assignments: Employees who are employed on less than annual appointments (i.e. 10 month contracts) are not eligible to receive the allowance for months not worked/employed.
3. Lost, stolen or damaged devices: The employee is responsible for all costs associated with the replacement of lost, stolen or damaged personally owned devices.
4. Transfer and termination: Periodically, employees who are receiving an allowance for a personally owned device will become ineligible for a device because of changes in job requirements, transfers, or as a result of personal circumstances with the employee. Depending on the circumstances related to the change in status, the costs associated with terminating the service may rest with the employee or with the University. Examples are:
  - a. *Promotion*: If an employee is promoted to a position which does not provide a personal communication device allowance and the employee chooses to cancel his/her personal plan, the employee is responsible for any early termination fee associated with the employee's plan and communication device.
  - b. *Transfer*: If an employee transfers from one position/department to another and the new position or receiving department does not provide a personal communication device allowance and the employee chooses to cancel his/her personal plan, the employee is responsible for any early termination fee associated with the employee's plan and communication device.
  - c. *Separation*: If an employee leaves his/her position voluntarily or as a result of disciplinary action, the university is not responsible for terminating any personal communication plan, nor will the university be responsible for any early termination or related costs associated with the employee's plan/contract. If the employee leaves the university as a result of a reduction in force, and chooses to discontinue his/her personal plan within 30 days, the university will reimburse the employee for any early termination fee associated with the device/contract.

E. Transitioning from a university-owned device to an allowance for an employee-owned device: With the approval of the department supervisor and principal budget authority, employees assigned a university-owned device may change to an employee-owned device, as long as they meet the requirements of section 3-20-122(2). In doing so, the employee may acquire their own device, or they may choose to transfer their university-owned device and phone number to their personal account. Transferring university-owned devices and phone numbers to personal accounts must be coordinated with telecommunications within the ITS department. The employee will reimburse the cost of the device based on the following schedule:

1. Device < 6 months old: 100% of the CWU purchase price/tax
2. Device > 6 months old and < 12 months old: 50% of the CWU purchase price/tax
3. Device > 12 months old: No reimbursement to CWU required
4. Required form: Personal Communication Device Agreement (PCDA)

## **(5) Reimbursement for business calls on employee-owned devices**

- A. Department may authorize reimbursement to employees for occasional, incremental expenses including business calls made on employee-owned communication devices. Incremental business expenses are expenses that result in additional costs above and beyond the employee's normal calling plan (i.e. excess minutes, roaming charges, etc). To be reimbursed, the employee will complete an A-19 form, and attach documentation showing the monthly business calls placed/received on the device and the valid business purpose for all calls identified.
- B. The university will only pay for minutes that are in excess of the base calling plan, and the reimbursement will not exceed the additional charges above the base calling plan. Expenses for minutes included in the base plan, which are used for business purposes, will not be reimbursed.

## **(6) Responsibilities and Personal Communication Device Agreement (PCDA) Form**

- A. The following responsibilities and actions are required to request and receive approval for a university provided personal communication device, or to receive a University allowance for use of a personally owned device for university business.
- B. Immediate Supervisor:
  - 1. Evaluate the business needs of employees under supervision to determine if the use of a personal communication device for university business is efficient or if official business cannot be accommodated by the use of a landline telephone, pager or other communication device.
  - 2. Consult with employees to initiate a Personal Communication Device Agreement (PCDA) form to authorize the most beneficial and economical personal communication device option and plan based on cost/benefit recommendations provided by the ITS department. Forward agreement to appointing authority.
  - 3. Make all necessary arrangements for all payments/costs associated with the option and service level requested.
    - a. University-owned device: Monthly service plan charges, device procurement, and central ITS department annual fees if enhanced service is selected.
    - b. Employee owned device: Monthly allowance and central ITS department annual fees if enhanced service is selected.
- C. Employee:
  - 1. Read Central Washington University's Personal Communication Device policy (CWU 204-10) and these procedures to fully understand all options, personal responsibilities, tax implications, limitations and other aspects of the option and service level requested.
  - 2. In consultation with immediate supervisor, complete the personal communications device agreement (PCDA) form,
  - 3. Comply with Central Washington University's [Acceptable and Ethical Use of University Information Technology \(CWU 701-07\)](#).
  - 4. Comply with all applicable laws related to the use of a mobile device while driving.

D. Appointing Authority:

1. Perform an annual review of all devices and allowances within 30 days of the start of the calendar year, to verify that there remains a valid business reason for the allowance. Results of the review are to be maintained by the business unit and available for review, as necessary.
2. Authorize applicable payments based on the selected option and service level requested and forward to vice-presidential level for approval if request is for enhanced service for an employee-owned device or if selected service level or allowance varies from the most beneficial option to CWU, as recommended by the ITS department.
3. Override ITS recommendation if they deem the qualitative benefits for the university exceed any additional financial cost.

E. Vice-President:

1. Evaluate and approve requests for employee-owned device allowances when enhanced service level 3 or 4 (direct connection to Mobile Technology Services) is requested or where the selected service level or allowance varies from the most beneficial option to University, as recommended by the ITS department.

F. Information Technology Services Department:

1. Provide appropriate service and coordination for all approved Personal Communication Device Agreements (PCDA).
2. Identify personal communication device options to supervisor and/or appointing authority and recommend the most beneficial and cost effective solution for CWU.
3. Perform annual review of industry pricing and propose adjustments to allowance levels as necessary.
4. Assist in transfer of existing devices and phone numbers to employees selecting Option 2, as necessary.

**(7) Supporting Documents:**

- A. Personal Communication Device Agreement (PCDA) form
- B. Personal Action Form
- C. A-19 Invoice Voucher