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Finance Procedural Statement: Personal Technology and Telecommunications [1]

Effective Date: April 1, 2025 *(see Revision Log for what changed on this date)*

Introduction

This Procedural Statement sets forth the rules and requirements under which the University may provide wireless telecommunications to employees and non-employees (including associates, affiliate fiscal staff, and other individuals) in support of official university business. The intent of this procedural statement is to provide reasonable assurance that such usage and expenditures are based upon consistently-applied and cost-effective practices, and that such usage and expenses are in compliance with all applicable rules, regulations, policies, and procedures.

The Procedural Statement is divided into the following sections:

A. General Requirements
B. Organizational Unit and Recipient Responsibilities
C. Temporary Assignment of Equipment
D. Reimbursement Restrictions and Rates
Personal Technology and Telecommunications Guidelines for Organizational Units
Personal Technology Responsibility Statement

Procedural Statement

A. General Requirements

- Expenses for wireless telecommunications may be authorized for employees and non-employees (including associates, affiliate fiscal staff, and other individuals) as long as the expenses are in accordance with the Administrative Policy Statement Propriety of Expenses and the requirements set forth in this Procedural Statement are followed.
- The fiscal principal of the organizational unit must authorize the wireless telecommunications use or reimbursement of use and must ensure that the organizational unit implements the designated monitoring procedures. This authority may be delegated in writing to another employee or affiliate fiscal staff within the organizational unit.
- For employees, Regents, affiliate fiscal staff, and medical residents, wireless telecommunications may be authorized on a permanent basis (for a period of three months or more) or on a temporary basis (for a period of less than three months).
- For other individuals, wireless telecommunications may only be authorized on a temporary basis (for a period of less than three months).

- Individuals who wish to upgrade their wireless telecommunications beyond the minimum required to conduct official university business may request to do so at their own expense. If the individual upgrades equipment, the equipment belongs to the University if the University has paid any portion of the equipment cost. If the individual upgrades service plan, the plan must be directly billed to the individual and the reimbursement limits identified in this PPS will be applied to the service charges.
- The University generally will not require reimbursement for an occasional personal call that does not result in incremental costs to the University provided the call enabled the individual to meet personal needs while achieving more efficient, effective conduct of university duties. The fiscal principal of the organizational unit is responsible for addressing patterns of personal calls that would create university exposure under tax law and other governmental regulations.

B. Organizational Unit and Recipient Responsibilities

The organizational unit must ensure that the following are in place and enforced:

1. Written departmental guidelines regarding appropriate equipment/services. Departmental guidelines ensure that the type of equipment/services is commensurate with the individual's job duties, job schedule, job location, and business travel requirements. In addition, they provide reasonable assurance that the equipment/services provided are the minimum required to accomplish official university business. Refer to Personal Technology and Telecommunications Guidelines for Organizational Units.

2. Billing arrangements that are commensurate with business needs. The University encourages (but does not require) pooled billing arrangements for all individuals within the organizational unit who have university-supplied wireless telecommunications. A pooled billing arrangement is one in which total minutes and data-transfer costs are established for all individuals within the respective group, rather than on a device-by-device basis. Billing arrangements must be reviewed no less often than annually in order to identify individuals who consistently underutilize or exceed their established limits and adjust their plans, as appropriate.

3. Billing arrangements that provide detailed call logs. Organizational units must obtain a detailed monthly bill from the vendor for all wireless telecommunications, indicating number of minutes used and incoming/outgoing telephone numbers (for voice calls); number of messages sent/received (for text messages); number of bytes transmitted (for email, instant messaging, and browser services).
If an organizational unit allows usage charges to be billed directly to the individual, then the University will reimburse the individual for business call minutes only upon receiving a detailed monthly bill.

4. Procedures to assure billing arrangements are cost-effective, including a mechanism to identify patterns of misuse or abuse.

- Whenever incremental charges are incurred, the organizational unit will review the detailed bill to identify personal charges and provide reasonable assurance that the University is reimbursed for them. (For pooled billing

arrangements, such reimbursement must be made on a pro-rata basis of the incremental costs caused by an individual's personal charges in proportion to the pool's personal charges.)

- No less than annually, the organizational unit will review records and identify activity that may be questionable upon public scrutiny or that may otherwise have an appearance of impropriety. In such cases, the individual responsible must provide documentation that explains how the activity was official university business; this documentation must be retained with the organizational unit's copy of the detailed bill.
- No less than annually, the organizational unit will review records to identify patterns of wireless telecommunications misuse/abuse in order to end the pattern and reduce the University's exposure under various regulations. See the Administrative Policy Statement Fiscal Misconduct Reporting.

5. Procedures to collect all equipment upon employment termination. The organizational unit must establish procedures to ensure that wireless telecommunications equipment is returned, and associated billing arrangements are ended, when an employee terminates from the University.

The recipient of wireless telecommunications is responsible for abiding by the points in the Personal Technology Responsibility Statement attached to this PPS.
If the recipient is being reimbursed for wireless telecommunications charges, it is the individual's personal, legal, and fiscal responsibility to protect university data being transferred.

C. Temporary Checkout and Monitoring

The organizational unit must designate a custodian for wireless telecommunications equipment that is assigned on a temporary basis. The custodian's duties are to:

1. Develop a checkout system and maintain a log for each piece of equipment that can be assigned on a temporary basis. The custodian may use either the suggested Personal Technology Checkout template or a similar form, as long as the custodian's log contains the following information:

- type of equipment, including manufacturer and model number;
- type of billing/payment plan (if applicable);
- who has possession of the equipment and her or his contact information;
- date the equipment was checked out;
- anticipated date the equipment will be returned; and,
- actual return date for the equipment.

2. Keep the checkout form itself, and all equipment that is not checked out or assigned, in a secure, locked location.

D. Reimbursement Restrictions and Rates

The organizational unit may purchase wireless telecommunications equipment and allow the usage charges to be billed directly to an individual (with an agreement to reimburse the individual for her or his business calls), or may allow the individual to be reimbursed for business-related wireless telecommunications usage charges that are billed directly to the individual's personal equipment. In either case:

1. Individuals must submit a detailed telephone log showing business call activity (information about personal calls may be redacted).

2. To ensure that the University does not pay more than price agreement-negotiated costs for wireless telecommunications, the following reimbursement rates will apply(if a multi-feature plan, the total actual costs cannot be exceeded):

- $0.20 per minute, or actual costs for voice services, whichever is less (note: reimbursement limit for wireless calls made while in international travel status is $1.99 per minute);
- $0.20 per message ($1.99 per message if in international travel status), or actual costs for text message services, whichever is less;
- $30 per month, or actual costs for data transfer services, whichever is less; and,
- actual costs of rental fees and usage for wireless telecommunications equipment while in international travel status.

The reimbursement of wireless telecommunications equipment (cell phones, PDAs, etc.) may be allowed in situations of emergency, as defined in University of Colorado Procurement Rules. (This does not apply to accessories such as headsets, chargers, cases, and the like.) Reimbursement of occasional wireless telecommunications service may be allowed in cases of critical business need. Individuals requesting occasional reimbursement for service will be limited to the reimbursement rates identified in this Procedural Statement but do not need to attest to the Personal Technology Responsibility Statement.

Exceptions

Unless approved by the appropriate campus controller [2], there are no exceptions to this procedural statement.

Related Administrative Policy Statements (APS)

- APS Propriety of Expenses [3]

Forms and Related Resources

- Personal Technology and Telecommunications Guidelines for Organizational Units [4]
- Personal Technology Responsibility Statement [5]
- Personal Technology Regent Responsibility Statement [6]
- Personal Technology Checkout Suggested Template [7]

Revision Log

- Updates 4/1/2025: Changed authority to approve exceptions from the Associate Vice President & University Controller to the appropriate campus controller.
- Supersedes PSC Procedural Statement Personal Technology & Telecommunications dated 4/1/2009.

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