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| <b>Title</b>            | <b>Cell Phone Allowance Policy</b>   |
| <b>Effective</b>        | <b>September 1, 2018</b>   |
| <b>Policy Statement</b> | <p>The College pays a taxable cell phone allowance to eligible employees who use their personal cell phones for qualifying business purposes. This allows the College to comply with IRS regulations, while also compensating eligible employees who have a qualifying business need for a cell phone.</p> <p>The College may choose to provide an on-call shared department phone for multiple individuals. Personal use is prohibited.</p>   |
| <b>Procedures</b>       | <p><b>Eligibility</b></p> <p>The following guidelines define “qualifying business need” for an employee to be eligible to receive a cell phone allowance. The employee must meet <u>at least one</u> of these criteria to be eligible to receive a cell phone allowance.</p> <ul style="list-style-type: none"><li>• As part of their regular job duties the employee is expected to be and must be accessible for college-related business outside of normal work hours. For example: senior college officials; public safety/emergency or risk management officials; critical facilities, or technology staff.</li><li>• The employee conducts more than 50% of their work away from their campus office.</li><li>• The employee travels extensively as part of their work. For example, they are away from Grinnell more than 3 days per week or 25 weeks per year.</li></ul> <p>*Telework arrangements do not qualify unless the position would otherwise qualify under the “qualifying business need”.</p> <p><b>Allowance Amount and Payment Terms</b></p> <p>The cell phone allowance is <b><u>\$40 per month</u></b>. The College reserves the right to review and adjust the allowance amount at its discretion, as necessary.</p> <p>Cell phone allowance payments will be processed monthly through Payroll. The amount of the allowance will be charged against the employee’s department budget.</p> <p>The cell phone allowance does not constitute an increase to base pay. It will not be included in the calculation of percentage increases to base pay due to annual raises or job upgrades. It will also not be considered when computing benefits based on a percentage of salary, such as employer contributions to the individual’s 403(b) retirement plan.</p> |

For eligible individuals employed 10 months of the year or less, the allowance will be paid for the number of months of the individual's appointment. Employees on leave (FMLA, parental, short term disability, long term disability, etc.) for thirty consecutive days, or more, are not eligible to receive a cell phone allowance while on leave.

The purpose of the allowance is to defray the employee's business-related costs associated with owning a cell phone. It is not intended to cover 100% of the cost of owning and using a cell phone. The allowance must not exceed the expenses actually incurred by the employee for cell phone service. Any costs not covered by the allowance are the employee's responsibility, including parts, service and accessories.

Personal cell phone services may not be paid via College purchasing cards or other expense reimbursement vehicles.

#### **Approval Process – Initial Request**

The process to request a cell phone allowance is as follows:

- The department head makes an initial evaluation as to whether the employee is eligible to receive a cell phone allowance, based on the established eligibility requirements.
- The department head completes and signs a Cell Phone Allowance Request Form. The employee also signs the request form.
- The department head sends the completed and signed request form to the Treasurer's Office.
- Final eligibility determination and approval of payment will be made by the Treasurer Office (Human Resources) based on the request form and the employee's job description.
- If approved, the request form will be forwarded to the payroll office for processing and retained in the Human Resources department.
- If denied, the request form will be returned to the department head with the reason for denial.
- If the employee changes positions, a new Cell Phone Allowance Request Form must be submitted and approved to determine the appropriateness of continued payments.

Employees approved to receive a cell phone allowance must:

- Disclose their cell phone number to their department head and other employees, as needed.
- Maintain active cell phone service the entire time they are receiving the allowance. Failure to do so will result in termination of the allowance.

#### **Approval Process – Annual Review**

Cell phone allowances are subject to annual review and re-approval.

- In May of each year, the Procurement Manager will provide department heads a list of individuals in their area who are receiving cell the phone allowance.
- By June 30<sup>th</sup>, department heads must reassess employee eligibility to receive a cell phone allowance. This includes an annual re-verification that the employee’s job responsibilities continue to satisfy one or more of the eligibility requirements.
- The department head reports back to the Procurement Manager affirming or denying continued eligibility for the cell phone allowance.
- Failure to reaffirm continued eligibility will prompt termination of the employee’s cell phone allowance.

**Expenses not Covered**

The employee’s cell phone contract cannot be in the name of Grinnell College. The employee is personally responsible for the purchase of the cell phone and any costs for cosmetic or technical extras. The employee is also responsible for all accessory purchases. Insurance, if purchased, is the responsibility of the employee.

The College does not accept any liability for claims, charges or disputes between the service provider and the employee.

**Security Requirements**

Employees receiving a cell phone allowance must adhere to the College’s Acceptable Use of Mobile Devices Policy. Additionally, the following precautions should be taken:

- **Verify app permissions.** Review app specifications and privacy permissions before installing.
- **Update operating systems to ensure protection from the latest security fixes and patches.**
- **Be cautious of public Wi-Fi hot spots.** Avoid financial or other sensitive transactions while connected to public Wi-Fi hot spots.

Employees are subject to prevailing laws prohibiting the use of cell phones for voice or texting while driving.

**Review Cycle**

This policy will be reviewed every two years, or as deemed necessary, by the Treasurer’s Office.