

SUBJECT: Internal Controls for the Management of Cellular-based Personal Communications Devices

NUMBER: 107-001-015

DIVISION: Office of the Director

EFFECTIVE DATE: 11-01-2006

APPROVED:



POLICY/PURPOSE:

This policy identifies minimum standards for agency internal controls relating to the management of charges for the use of cellular-based personal communications devices.

AUTHORITY:

ORS 291.015, ORS 291.016, ORS 291.018, ORS 291.026, ORS 291.034, and ORS 291.038

APPLICABILITY:

All Executive Branch agencies under direct authority of the Governor. Other agencies may follow this policy at their option.

DEFINITIONS:

Access Account

The account for each access number for voice/data transmission provided by a cellular communications provider.

Authorized User

The person or entity authorized to use the access number on the Access Account.

Personal Communication Device (PCD)

A wireless handheld device using a cellular network for voice/and or data communication including Personal Digital Assistants (PDA), cellular phones, or any combination. Typical functions include computing, personal information management (PIM), software applications, networking features, e-mail, two way radio, and voice.

This policy applies to any personal communication device that requires the purchase of cellular communication services by the state.

Plan Charge

The charge assessed by a data or voice provider for each Access Account.

GUIDELINES:

1. Responsibility of the Agency Director:

Each agency director is responsible for ensuring that their agency has sufficient safeguards in place to ensure that expenditures for cellular communications are restricted to those necessary for the conduct of official state business. This includes ensuring that there are sufficient internal controls:

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To ensure appropriate usage of PCDs (i.e. Restrictions on Personal Calls) and compliance with applicable rules and polices (i.e. Confidential Information, Use while Driving).

To ensure that State only pays Plan charges for Authorized users; and

To ensure that Authorized Users are on the most cost effective plan for their type of use.

2. Designation of Cellular Communication Plan Coordinator will, at a minimum:

Each agency director must designate, in writing, one of more individuals who are authorized to act as Cellular Communication Plan Coordinators. The Plan coordinators will be the only ones authorized to open, manage and cancel Access Accounts.

3. The Cellular Communication Plan coordinator will, at a minimum:

- a. Authorize the vendors to issue telephone/access numbers for Authorized Users.

Users should be designated in such a manner to facilitate audits and reviews of the accounts and the account charges. For example, individual employee names or identification numbers should match state personnel records, and special purpose lines should be identified as such so they can be removed and treated separately during inquiries about Plan charges and Authorized Users.

- b. Serve as contact and liaison with DAS and the vendor.
- c. Ensure that specific staff are assigned to monitor Plan charges including use by unauthorized users, appropriateness of plans, and personal use.
- d. Keep a list of all PCDs and Authorized Users. Ensure that PCDs are securely stored when not assigned to Authorized Users. The purpose of this section is to maintain control over the device until the associated Plan Charges for the device are disconnected.
- e. Ensure that access services for lost or stolen PCDs are disconnected.

4. The Supervisor of the Authorized User will, at a minimum:

- a. Determine if a valid business reason exists to provide a PCD and/or authorize Plan Charges for an Authorized User. Examples of valid business reasons include:
 - i. Official duties require the worker to be "on-call" away from workstations.
 - ii. Official duties require travel during their normal assigned work time.
 - iii. Official duties expose staff to danger.
 - iv. Official duties require an emergency or time-critical response.
 - v. Cost of device is justified by the gain in operational efficiency.

GUIDELINES: (cont)

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Issuance of a PCD and the authorization if Plan Charges expose the agency and state to liability for all charges resulting from the use of the PCD. Agencies need to be able to identify a business need when determining if the issuance of a PCD is necessary.

b. The Supervisor will ensure that the Authorized User:

Has received training on acceptable use, understands their responsibilities and signs an acceptable use policy.

- i. Knows the importance of protecting confidential and sensitive information contained on a PCD that can be released during voice/data transmissions or with the loss or theft of a PCD.
- ii. receives a copy of the policy

c. The Supervisor will co-ordinate with the agency's Human Resources office on wireless issues. Possible sanctions for misuse could include:

- i. Forfeiture of wireless access;
- ii. Required reimbursement of personal or other inappropriate use;
- iii. Sanction up to and including dismissal; and
- iv. Criminal Charges

5. The Authorized User will, at a minimum:

- a. Take reasonable steps to ensure the physical security of PCDs. Report missing, lost or PCD's to the Supervisor and Cellular access coordinator immediately.
- b. Use the PCD in a manner consistent with the Acceptable Use policy.
- c. Take reasonable steps to prevent the release of confidential or sensitive information either during the voice/data transmission or from the loss/theft of the PCD.
- d. Understand that sanctions, including dismissal, may result from the unauthorized use of the PCD.

6. At least annually, agency staff will be directed to review and validate Plan Charges and authorized users to ensure that expenditures for Plan charges meet the requirements under this section.