

IDENT	FIN-04
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SUBJECT: Cell Phone Usage and Cost Allowance Policy

1. Purpose of Cell Phone Usage and Cost Allowance Policy

Vermont Information Technology Leaders, Inc. (VITL) may be the recipient of Federal grant funds, the use of which is subject to certain Notices of Grant Awards ("NGAs") and Health Human Services ("HHS") grant administration regulations found in 45 C.F.R. Part 75—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR HHS AWARDS. It is the intention of VITL to satisfy the policy requirements of such regulations in the event that compliance is required pursuant to the awarding of federal grants in the future. Therefore, the purpose of this policy is to ensure that cell phone expenses incurred by VITL are in conformity with accounting principles generally accepted in the United States of America ("GAAP") and in compliance with federal regulations.

2. Scope

- a. This Policy shall be construed and applied to promote VITL's compliance with the applicable Federal and State rules, regulations, and laws. In the event of a conflict between the provisions of this Policy and the requirements of an applicable state or federal statute or regulation, the applicable statute or regulation shall prevail.
- b. This policy applies to all VITL staff cell phone expense regardless of funding source.
- c. This Policy sets forth internal guidelines for the benefit of VITL and its officers, directors, employees and agents, and does not confer any right or other benefit on any third party. The provisions of this Policy may not be used by any third party in any action or other proceeding against VITL or its interests.

3. Use of Cell Phones or Similar Mobile Devices

For purposes of this policy, the term "cell phone" is defined as any handheld electronic device with the ability to receive and/or transmit voice, text, or data messages over a cellular network (including, but not limited to, cellular telephones, digital wireless phones, radio-phones/walkie-talkies, telephone pagers, PDAs, smart phones, tablets or other wireless devices).

- a. General Use at Work. While at work, employees are expected to exercise the same discretion in using cell phones for personal reasons as they use with company desk phones. Excessive personal communications during the workday, regardless of the device used, can interfere with employee productivity and be distracting to others. Employees should restrict personal calls, texts and emails during work time, and should make every effort to use cell phones only during scheduled breaks or lunch periods in non-working areas. Employees should ensure that their friends and family members are instructed of this policy. The Company is not liable for the loss of personal cell phones brought into the workplace.

- b. Unsafe Work Situations. The Company prohibits the use of cell phones or similar devices while at any work site at which the operation of such device would be a distraction to the user and/or could create an unsafe work environment. Such work sites must be secured, or the device used only by an employee who is out of harm's way at such work environments.
- c. Use While Driving. The Company requires that employees observe all laws and regulations concerning the use of cell phones while driving.

4. Cell phone allowance

Designated VITL employees have two options regarding the provision of and payment for cell phones:

- a. Cell phone provided and paid for by the Company.
 - i. The Company has a group business account for cell phones. Eligible employees may be added to the account with their manager's approval.
 - ii. Employees may convert their employee-owned cell phone to a Company group plan. The employee's cell phone number may be preserved. Contact the Infrastructure Manager for more details.
 - iii. Monthly costs for Company phones are covered in full.
 - iv. Phone upgrades are allowed after three years and with manager approval.
 - v. Phones are the property of the Company and must be returned to the Company when replaced by a new phone under this program, or when the employee leaves the Company.
 - I. Employees in possession of Company equipment (including cell phones) are expected to protect the equipment from loss, damage, or theft. Upon resignation or termination of employment, or at any time on request by the employee's manager, the employee may be asked to produce the phone for return or inspection.
 - II. Any employee unable to present the phone in good working condition within two weeks will be expected to reimburse the Company for the value of the phone.
- b. Employee owned phone and personal plan.
 - i. The Company will provide an allowance to the employee at set amount per month with their manager's approval.
 - ii. VITL will reimburse the employee for the purchase of a phone up to \$250.
 - iii. Phone upgrades are eligible for reimbursement after three years and with manager approval.
 - iv. Employee-owned phones will be made available to the Company when replaced by a new phone or when the employee leaves the Company, so that the Company's Security Officer can ensure that Company information has been wiped from the device.
 - v. Part-time employees in positions designated as eligible for reimbursement must select this allowance option.
 - vi. Monthly allowance and cost of phone will be pro-rated based on part-time work percentage.

All employees, regardless if cell phone is provided by VITL or employee owned and VITL reimbursed, are required to adhere to VITL InfoSec2 - Information System User Policy as it relates to portable devices.

Regardless of the plan selected above, the Company will reimburse the employee for the reasonable cost of equipment to enable hands-free cell phone operation in one vehicle.

5. **Policy Review & Approval**

VITL will review this policy every two years and reserves the right to update this policy at any time to reflect VITL's intentions and compliance requirements.



Reviewed by: CFO

10/29/2019

Date



Approved by: CEO

10/29/2019

Date

Approved by the VITL Board of Directors and effective October 29, 2019:



Bruce Bullock, MD, VITL Board Chair