

**LOUISIANA STATE UNIVERSITY - HEALTH CARE SERVICES DIVISION
BATON ROUGE, LOUISIANA**

POLICY NUMBER: 0517-20

CATEGORY: Administrative Services

CONTENT: Cellular Equipment and Mobile Device

APPLICABILITY: This policy applies to all employees of the HCSD headquarters and Lallie Kemp Medical Center (LKMC) including classified employees, unclassified employees, students, contractors and agents of HCSD and LKMC who wish to use an HCSD or LKMC issued mobile device or who wish to connect a personal mobile device to the HCSD or LKMC IT Infrastructure.

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INQUIRIES TO: Chief Operations Officer
LSU Health Care Services Division
PO Box 91308
Baton Rouge, LA 70821
Telephone: (225) 354-7008 Facsimile: (225) 354-7011

Note: Approval signatures/titles are on the last page

**LSU HEALTH CARE SERVICES DIVISION (HCSD)
CELLULAR EQUIPMENT AND WIRELESS DEVICE POLICY**

I. PURPOSE

The purpose of this policy is to provide guidelines for:

- A. Establishing and documenting the need for cellular equipment and mobile devices;
- B. Protecting the security and integrity of HCSD data and technology infrastructure;
- C. Obtaining agency approval for reimbursement for use of a personal device for business matters;
- D. Limiting and controlling cellular equipment and mobile device use to HCSD business related situations concerning patient/employee care, safety, and well-being or HCSD operational business matters.

II. STATEMENT OF POLICY

The use of and reimbursement for cellular equipment and mobile devices by HCSD is to assure that appropriate employees have immediate access to communications service under one or more of the following circumstances:

- Work assignments that require frequent travel;
- Work assignments that routinely involve the potential need for HCSD related business communications;
- Other situations when patient care, employee safety, or operational issues are a factor.

Access by cellular equipment and mobile devices must occur through a means that maintains the security and integrity of the data. Therefore, HCSD employees must agree to the terms and conditions of this policy prior to connecting a personally owned mobile device to the HCSD IT Infrastructure or access any HCSD IT system or application.

Reimbursement for use of cellular equipment and mobile devices is taxable and will be reported as income on W-2.

Note: Any reference herein to Health Care Services Division also applies and pertains to Lallie Kemp Medical Center.

III. GENERAL

- A. HCSD recognizes two (2) cellular equipment and mobile device options:

1. Reimbursement for use of a personal cellular phone. Reimbursement for a personal cellular phone will be made on a limited basis where warranted by special circumstance. Connectivity to the HCSD Network from a personal cellular phone will require adherence to the HCSD security requirements.
2. Issuance of an HCSD owned tablet computer and/or hotspot device (such as a MiFi) will be made on a limited basis where warranted by special circumstance. Responsibility for controlling, safeguarding, and maintaining HCSD tablet computer equipment and wireless devices will rest with the employee using the HCSD equipment.
3. All requests for issuance of HCSD owned equipment must be justified by describing the benefit to be gained from its availability and use.

B. Employee Email/Text Usage on Cellular Equipment and Mobile Devices:

1. Non-exempt employees who receive work-related emails or texts outside of their official work schedule or while in an approved leave status shall not take any action on such emails or texts, unless directed to do so by their Supervisor or higher.
2. Employees having access to email and/or text capability on their personal devices that has NOT been authorized by HCSD for HCSD business, are not required to respond to such email and/or text, and shall not be reimbursed for cellular service.

IV. EXPECTATION OF PRIVACY

- A. Employees shall have no expectation of privacy at any time they are using personal cellular equipment, a personal mobile device or an HCSD issued mobile device to access any HCSD data or IT systems, regardless of whether the data was generated as the result of authorized use, incidental use, or if the use is not permitted by or described by this Policy.
- B. HCSD may access, monitor, or disclose, as HCSD deems appropriate, any HCSD data or transmission of HCSD data, (including confidential or personal information), without notice to or consent from the employee for any reason.
- C. HCSD, at its discretion, may disclose the results of any such monitoring to appropriate HCSD or LSUHSC-NO personnel, law enforcement, investigating agencies and may use those results in appropriate external and internal disciplinary actions and other proceedings.
- D. By using personal cellular equipment, a personal mobile device or an HCSD issued mobile device to access the HCSD IT Infrastructure, all employees acknowledge that they are subject to the terms of this policy and give their unrestricted consent

to the monitoring, copying, and unrestricted distribution of any transmission/communication or image generated, received by, or sent by a the computing device or application on the HCSD IT Infrastructure.

V. MANAGEMENT RESPONSIBILITY

- A. Requests for reimbursement for personal cellular phones or issuance of HCSD equipment must be submitted to and approved by the HCSD Chief Operations Officer or designee.
- B. The offices/facilities issuing HCSD owned equipment shall be responsible for familiarizing employees with the operations of the equipment and ensuring the equipment is used appropriately. Any potential abuse or misuse of HCSD issued equipment will be investigated and appropriate action will be taken.

VI. ACCEPTABLE USE

- A. HCSD employees using HCSD issued or personally owned cellular equipment or mobile devices for HCSD business must follow HCSD Cellular Equipment and Mobile Device Policy, 0517.
- B. HCSD employees using HCSD issued cellular equipment or mobile devices should only use the device for HCSD business and must adhere to HCSD Internet Use Policy, 4512, and HCSD E-Mail Policy, 4511.
- C. HCSD employees using personally owned cellular equipment or mobile devices to connect to the HCSD IT Infrastructure must adhere to HCSD Internet Use Policy, 4512, while connected to the HCSD IT Infrastructure.
- D. HCSD employees using personally owned cellular equipment or mobile devices to access the HCSD E-Mail system must adhere to the HCSD Email Policy, 4511.
- E. HCSD employees using HCSD issues or personally owned cellular equipment or mobile devices shall do so in an ethical manner, following the HCSD Code of Conduct Policy, 8501.
- F. HCSD employees must understand and follow the acceptable use of a personal computing device as detailed in LSU HCSD Policy 0517, LSUHSC-NO CM-42 and LSUHSC-NO EIS-100, while the device is connected to the LSU HCSD network infrastructure. This includes but is not limited to:
 - a. Employees SHALL,
 - i. Comply with all federal and state laws, LSU System, LSUHSC and/or HCSD rules and policies, terms of computing contracts,

- and software licensing rules;
- ii. Obtain authorization to use LSUHSC and/or HCSD computing resources from the owner of the resource;
- iii. Be held responsible for the use of their assigned Network User ID and any and all actions that are performed with that ID, including from personal cellular equipment and mobile devices;
- iv. Actively participate and cooperate with the IT Department in the protection of the HCSD IT Infrastructure against threats by using virus-scanning software, not opening E-mail from an unknown source, safeguarding passwords, reporting any violations of the acceptable use statement to the local IT support staff, and cooperating with the local IT support staff to keep security patches up to date on applications, cellular equipment and mobile devices, and computers, and staying abreast of new security issues by completing information security training. Anyone suspecting they may have a computer virus should contact their local IT support staff immediately;
- v. Register Personally-Owned Cellular Equipment and Mobile Devices that Connect with HCSD IT Infrastructure with the LSUHSC mobile device management system (MDM);
- vi. Take reasonable precautions to prevent unauthorized access to or disclosure of protected and restricted information stored on cellular equipment or a mobile device.

b. Employees SHALL NOT,

- i. Reveal their LSU User ID and password to anyone;
- ii. Engage in any activity that jeopardizes the availability, performance, integrity, or security of the HCSD IT Infrastructure;
- iii. Use computing resources in a wasteful manner that creates a direct cost to HCSD;
- iv. Use HCSD IT resources for personal monetary gain or commercial purposes not directly related to HCSD business or for functions that are not related to one's job;
- v. Use the Guest Wireless Network for personal use during work hours;
- vi. Store unencrypted User IDs and passwords which allow access to the HCSD IT Infrastructure on cellular equipment or mobile devices;
- vii. Allow others access to HCSD data from cellular equipment or mobile devices;
- viii. Use cellular equipment or mobile devices to photo patients;
- ix. Use cellular equipment or mobile devices for work while driving, except in a manner that complies with local traffic laws.

VII. OWNERSHIP OF DATA AND APPLICATIONS

A. HCSD data and systems accessed from cellular equipment and mobile devices are, at

all times, the property of HCSD.

- B. HCSD employees must allow HCSD IT and Compliance staff access to any cellular equipment or mobile device used to access HCSD data, for the purposed of security and compliance investigations.
- C. Personal cellular equipment or mobile devices used to access HCSD IT Infrastructure could potentially contain HCSD data or applications. HCSD Personnel must allow HCSD IT to protect HCSD data and applications. Personal information may be lost should HCSD IT remote wipe personal cellular equipment or mobile device to protect HCSD data and applications. (for example, lost or stolen cellular equipment or mobile devices may require a remote wipe)
- D. Unauthorized use, duplication, or access of company data is grounds for disciplinary action up to and including termination, as well as, potential civil or criminal proceedings

VIII. SECURITY

LSU HCSD employees must ensure any personal cellular equipment or mobile device used for LSU HCSD business or connected to LSU HCSD IT infrastructure meet all requirements for protecting and securing the device, as detailed in LSU HCSD Policy 0517 and LSUHSC-NO EIS-100, including, but not limited to:

- A. Any device accessing HCSD data or IT infrastructure shall have encryption enabled (including storage media, such as USB hard drives or memory sticks, SD or CompactFlash cards, and any peripherals connected to a device);
- B. Any device accessing HCSD data or IT infrastructure shall be configured to check for and apply both operating system and application updates and patches at least weekly;
- C. Any device accessing HCSD data or IT infrastructure capable of using antivirus or antimalware software shall have the software installed and configured to regularly update the software and virus signatures;
- D. Any device accessing HCSD data or IT infrastructure shall be capable of locking the screen and shall have this feature configured, such that unlocking requires the use of PIN, passcode, biometric, or password. Devices that support an automatic wipe should be set so that HCSD data is wiped after 10 invalid unlock attempts;
- E. Any device accessing HCSD data or IT infrastructure shall be configured with an automatic lock after inactivity of no more than 10 minutes and must require a PIN, passcode, biometric or password to unlock.
- F. Backups of any device accessing HCSD data shall also be encrypted.

G. Reasonable care shall be taken to avoid the unauthorized access to, or disclosure of, the information stored on, or accessed by, any device used to access HCSD data.

IX. SEPARATION

All HCSD issued cellular equipment or mobile devices must be returned immediately upon separation from HCSD.

All HCSD data and HCSD licensed applications must be removed from personally owned cellular equipment or mobile devices immediately upon separation from HCSD.

X. RISKS/LIABILITIES/DISCLAIMERS

HCSD employees using HCSD issued or personally owned cellular equipment or mobile devices agree to the following conditions:

- A. HCSD employees cannot hold HCSD or HCSD IT personnel liable for data losses related to data security and/or remote wipes (whether due to a lost/stolen device or employment termination).
- B. HCSD has the right to disconnect employee devices and/or disable work related applications and services to the HCSD IT Infrastructure without notice.
- C. HCSD employees must report stolen devices to HCSD as soon as a device is known to be stolen.
- D. Lost devices are considered lost if the device is missing for a 24 hour period. HCSD employees must report lost devices to HCSD as soon as the device is considered lost.
- E. HCSD employees assume all costs associated with personally owned cellular equipment or mobile devices, unless explicitly outlined in this policy.
- F. HCSD employees assume full liability for personal data losses, OS crashes, errors, bugs, malware, viruses, etc., that occurs with personally owned cellular equipment or mobile devices.
- G. Violations of this Cellular Equipment and Mobile Device Policy, LSU HCSD Policy 0517, could result in disciplinary actions up to and including termination and civil/criminal proceedings.

XI. PROCEDURES FOR HCSD PROVIDED EQUIPMENT

- A. Requests for HCSD issued equipment must be submitted to, and approved by, the HCSD Chief Operations Officer or designee **prior** to receiving the HCSD issued equipment.
(See Attachment #1)
- B. If approved, employee will complete and sign the Acknowledgement Form.
(See attachment #2)
- C. Approved copies of Attachment #1 and Attachment #2 shall be submitted to

HCSD Human Resources Payroll Department.

- D. When assigned, it is the responsibility of the employee to prevent misuse, damage, and theft of the equipment.
- E. Any missing equipment will be the responsibility of the employee, pending investigation of the loss.
- F. Approved employees receiving tablet computers will receive email capable equipment from the list of supported equipment. The tablet computer will come with unlimited data for business purposes. The list of supported tablets from either AT&T or Verizon will have the Apple iOS or Android OS as the operating system.
- G. Approved Tablet Computers are:

Apple iPad (AT&T or Verizon)
- H. HCSD has the discretion to charge the employee for misuse, non-returned, damaged or stolen equipment.
- I. HCSD hotspots will be provided to approved employees based on the requirement for laptop use to process data to meet their job functions, when outside direct connection to the HCSD network. These cards currently have unlimited data access.
- J. Employees who have been issued HCSD equipment are not allowed to bring with them or use their equipment when they travel internationally. IF a user feels that the equipment is necessary for business purposes, a request must be submitted to the HCSD Chief Operations Officer or designee **prior** to leaving the country.
- K. In the event of resignation/retirement, lay off and/or separation of employment, the employee shall return all issued equipment no later than last day on duty.

XII. PROCEDURES FOR REIMBURSEMENT OF EMPLOYEE PERSONAL CELLULAR PHONE

Primarily, employees will use their personal cellular device for HCSD business. If an employee qualifies to do so, a subsidy of \$50.00 per month will be paid provided the following criteria is met:

- A. Requests for subsidy must be submitted to, and approved by, the HCSD Chief Operations Officer or designee prior to receiving the subsidy. A copy of the cellular contract or a copy of the employee's latest cellular phone bill shall be attached to the request as documentation. (See Attachment 1)

- B. If approved, employee will complete and sign the Acknowledgement Form. (See attachment #2)
- C. Approved copies of Attachment #1 and Attachment #2 shall be submitted to the HCSD payroll office. Reimbursement eligibility will become effective on the first day of the month in which the Chief Operations Officer approves plan.
- D. No later than January 15th of each calendar year, the employee shall submit proof of continued cellular phone contract to the employee's payroll office. The employee may use the front page of their cellular phone bill as proof of continued contract. Phone number on contract must match phone number on approval forms. This reimbursement is taxable and will be reported as income on W-2.
- E. Failure to provide the requested information by January 15th, may result in a loss of reimbursement.
- F. Employees will be reimbursed on an annual basis except under the following conditions:
 - 1. In the event of resignation/retirement, lay off and/or separation of employment, the employee may claim and be allowed reimbursement for the amount deemed earned upon termination effective date.

XIII. EXCEPTIONS

The HCSD Chief Operations Officer or designee may make exceptions to this policy when it is deemed to be in the best interest of the agency.

REQUEST FOR EQUIPMENT/WIRELESS DEVICE

EMPLOYEE NAME: _____
(Please Print)

DEPARTMENT: _____

JOB TITLE: _____

WORK DOMICILE: _____
(City)

DATE OF REQUEST: _____

Request for:

___ Subsidy for Personal Cellular Phone Data Plan Phone Number: _____

___ AT&T Tablet ___ Verizon Tablet ___ Cellular Hot Spot (MiFi)

Provide written justification/benefit for securing the service requested. (If you are requesting the subsidy, you shall also attach cellular contract or a copy of your latest cellular phone bill)

Approvals:

Supervisor/Manger

Date

Chief Operations Officer/Designee

Date

(Keep a copy of the completed form for your records and submit a copy of completed form as directed in the policy)

Employee Acknowledgement of Cellular Equipment and/or Wireless Device Responsibilities

Name (print) _____ acknowledges that I have read and understand HCSD Policy 0517, Cellular Equipment and Wireless Device, and will comply with the provisions outlined within the policy.

Agency Provided Devices:

The device is for official HCSD business. Unauthorized downloads including, but not limited to, ring tones, music, roaming, long distance, international call, or other charges accrued that are clearly not HCSD related shall be charged back to the employee.

The device I am receiving:

_____ Apple iPad _____ Hot Spot (MiFi)

Number: _____ Serial Number: _____

I accept responsibility for the HCSD issued device. If an HCSD issued device should become lost, stolen, misused or damaged, I understand that I may be responsible for payment of the device.

Employee Signature/Date: _____

Agency Authorization/Date: _____

Personally Owned Cellular Device: (initial each block below)

_____ I am requesting compensation subsidy of \$50.00 per month for cell phone #_____. I understand this compensation subsidy is taxable and will be reported as income on W-2.

_____ I understand that the subsidy will be reimbursed annually and not monthly

_____ I agree to provide proof of continued cellular service no later than January 15th of each calendar year to receive the subsidy

_____ I understand that failure to submit proof of continued cellular service later than January 15th of each calendar year, may cause me to be ineligible for the subsidy

_____ I agree to comply with the HCSD security requirements for cellular access to HCSD email

_____ I agree to utilize the encryption passcode of my phone.

Employee Signature/Date _____

(Keep a copy of the completed form for your records and submit a copy of completed form as directed in the policy)

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Digital Signatures:

Currently Signed

Approver:
Buie, Lanette
Chief Operations Officer


09/28/2020

Approver:
Kees, James "Mickey"
HCSO Chief Information Officer


09/28/2020