

Electronic Devices and Services

I. PURPOSE

PAVIR is committed to providing its employees with the tools, equipment and environment needed to fulfill their responsibilities. This policy provides guidelines for the use and provision of electronic devices and services, identifies when and how PAVIR funds may be used, and ensures that PAVIR complies with applicable Internal Revenue Service and State regulations.

II. POLICY STATEMENT

PAVIR's policy on electronic devices, equipment and related services supports the performance of official duties while assuring that private benefit does not inure. PAVIR holds high standards for data security and privacy throughout the life of PAVIR electronic devices and at the time of their disposal.

PAVIR provides employees with the appropriate electronic devices and services (or a taxable allowance for same) to enable employees to perform and fulfill their work duties.

When a supervisor identifies unmet business needs, s/he will determine the electronic devices and related services available and the appropriate level of equipment to be provided, considering the features needed to fulfill the employee's duties.

PAVIR requires that the electronic devices and services provided by PAVIR be primarily used for business purposes.

Employees may use employee-provided electronic devices or services for both business and personal use when approved by the supervisor.

III. DEFINITIONS

a. Types of electronic devices (also referred to herein as "equipment") and services included but not limited to:

- Mobile phone and related service
- Computers
- Hotspots
- Home internet service
- Digital cameras
- Tablets (such as iPads)
- Digital storage devices

b. Business Necessity

PAVIR business necessity exists when one or more of the following factors is present:

1. It is vital for the employee to be in frequent contact with the office, lab or research facility.
2. The employee is responsible for emergency preparedness and will be available and on-call around-the clock for a specific business period.
3. A group of employees has the need for group or shared electronic devices, equipment and/or services such as rotating on-call contact.

4. The employee does not have access to a landline or other communication device when doing a substantial portion of his or her job and communication with the supervisor or other business parties is required.
5. Provision of electronic devices and services is the most cost-effective way to meet the business communication requirements of the employee.
6. The employee is a remote employee who works offsite on a full-time basis.
7. The equipment or service is necessary for an approved research or education activity.

In the absence of any of the factors above, use of an electronic device such as a mobile phone for two-factor authentication is considered de minimis and not a business necessity.

IV. GENERAL POLICY

- a. PAVIR strongly encourages that, under normal circumstances, computers will be replaced no more than once in any 36-month period.
- b. Expenditures for electronic devices and related services must follow the approval process and are tied to demonstrated business needs. The employee's supervisor will determine the need, based upon the employee's job duties.
- c. Convenience is not a criterion for providing electronic devices and related services. The approval process includes a review of all aspects of the devices and/or services to ensure that they are provided at a reasonable cost consistent with PAVIR business requirements for the employee
- d. Digital cameras and accessories will be purchased only if there is documented project specific need.
- e. All computers and computer related purchases must be purchased through PAVIR's Purchase Order system. Reimbursement for items purchased by individuals is generally not acceptable. Any exceptions will require CEO approval.
- f. The Director of Data Integrity or designee will review purchase requisitions for electronic devices and equipment for conformance with applicable policies depending upon the network to which the items will be connected (VA, Stanford or none).
- g. All deliveries of computers, peripherals, and other electronic devices will be made to PAVIR Purchasing where they will be tagged and documented in accordance with VA and PAVIR policies prior to delivery to the end user.
- h. All computers that are purchased by PAVIR will be encrypted prior to delivery to the end user.
- i. Sensitive data and programs must be removed prior to disposal of PAVIR electronic devices and equipment. Therefore, all such equipment must be turned in to PAVIR Administration for disposal.

V. PROCEDURES

PAVIR will evaluate the business need for company-provided electronic devices only after a signed Request for Electronic Devices or IT Services form is submitted by the requestor.

PAVIR will provide a taxable allowance in lieu of company provided electronic devices and services only after an approved Mobile Phone/Internet Allowance Request form is submitted to Payroll.

Both forms can be found at <https://pavir.org/resources/forms/>.

Items exceeding \$5,000 will be managed in accordance with PAVIR's Equipment Policy found at <https://pavir.org/resources/policies/equipment/>.

a. Company-provided electronic devices and services

1. Employees submit to their supervisors a request for electronic devices and/or services justifying the need.
2. The supervisor or designee submits the Request for Electronic Devices form and the purchase requisition to PAVIR Purchasing who will place the order. Once Purchasing receives the equipment from the vendor, it will be distributed to the employees by PAVIR Purchasing staff.
3. Requestors of company-provided electronic devices or equipment that will be connected to the VA network should consult with the VA Information System Security Officer (ISSO) to ensure compliance with VA data security standards and requirements.
4. In the case of hotspots, Purchasing will work with IT to provide the device to the requestor. Purchasing will select the carrier, negotiate the business terms, and administer the contract with the selected carrier.

b. Allowances in lieu of company-provided equipment and services

When appropriate, PAVIR may provide a monthly taxable allowance of \$50 to support the business use of an employee-provided mobile phone and service.

When a supervisor has determined that business necessity exists for a full time, remote employee to be provided home internet service, PAVIR may initiate a monthly allowance of \$50 to support the business use of home internet service.

The amount of these allowances is subject to annual review and revision.

1. Supervisors or designees submit the signed Mobile phone/Internet Allowance Request form to the PAVIR Payroll department for processing via email to payroll@pavir.org.
2. All approved Electronic Device Allowance request forms must be received by Payroll by the last day of each pay period for the allowance to take effect in the pay period when the allowance is approved. There will be no retro-allowance paid for prior pay periods if these request forms are not received by Payroll by the last day of each pay period.
3. This allowance is considered taxable income. It is subject to applicable withholding taxes and will be included in the employee's W2 each calendar year.
4. The employee will be solely responsible for understanding and complying with all applicable laws and policies related to the use of a mobile phone, including travel and highway safety laws relating to mobile phone usage, ergonomic use guidelines and privacy and data security policies.
5. The monthly allowance will continue until written notice to stop the allowance is received from the supervisor.

VI. DISCONTINUANCE OF ALLOWANCE OR COMPANY PROVIDED ELECTRONIC DEVICES AND SERVICES

PAVIR has the right to discontinue or suspend the provision of company-provided electronic devices, services or monthly allowance at any time when PAVIR business needs change or in the case of improper use of company-provided devices.

The supervisor or designee is responsible for immediately informing Payroll at payroll@pavir.org to stop the monthly allowance when there is a change in the employee's scope of work such that company-provided electronic devices or services are no longer required.

The employee must return all company-provided equipment to PAVIR Human Resources at the time of employment termination or when there is a change in the employee's scope of work such that company-provided electronic devices or equipment are no longer required.

Consult ITHelp@pavir.org for proper disposal of PAVIR computers, tablets and other electronic devices.