



Internal Controls Over Voice Communications

Gregory J. Nickels, Mayor
Bill Schrier, Chief Technology Officer

Summary and Background

Background: While it is City policy that telephones should be used for work purposes, the City recognizes that staff members may need to use the telephones to accommodate the demands of daily living. Thus the City allows minor personal use of City telephones, including cell phones, for local and long-distance calls so long as the use is occasional, does not cost the City money or interfere with City work, and is authorized by management (see Ethics and Elections Commission Guidelines for Use of City Facilities and Equipment, August 1999 and Memorandum 99-06). The cost of long-distance services has decreased, and the staff time necessary for detailed monitoring of personal telephone use often costs the City more than the use itself. Loss of productivity from non-work related calls is now a bigger issue than the cost of the calls. The revised policy, stated below, is intended to reduce monitoring costs while continuing to control improper use of City phones.

Policy: City supervisors will review employees' phone use on a regular basis, not less frequently than once per quarter. When long-distance or cell phone use exceeds expectations for an employee position in a given period, the employee will be asked to review and identify personal combined phone activity. It is not deemed cost effective for the City to monitor total calls costing \$3.00 or less per month per employee. It is more relevant for City supervisors to review employees' personal phone use, both local and long-distance, for the purpose of monitoring productivity.

When personal use exceeds \$9.00 for all combined phone activity (e.g., desk phone long distance plus cellular phone) during a three month period, employees will reimburse the City for their personal calls. When personal combined phone activity exceeds \$9.00 during a three month period, a \$9.00 processing fee will be added to the reimbursement bill to cover the cost to the City to process a reimbursement check. In most instances, employees should use their own prepaid phone cards for personal long-distance calls from a City phone.

1.0 Purpose/Scope

- 1.1 To establish internal controls over the use of telephones and cell phones.
- 1.2 To establish guidelines for Department responsibilities in managing phone use.
- 1.3 To establish policies for the use of telephones and cell phones by City personnel.
- 1.4 To reduce the cost to the City for managing telephone services.

2.0 Definitions

- 2.1 "DoIT" means the Department of Information Technology. DoIT is the City Department responsible for the operation, maintenance, and security of the City's voice communications system.



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2.2 “Personal combined phone activity” shall mean long distance desk phone use plus City cellular phone use that is of a personal nature.

2.3 “Quarterly accounting period” shall mean a consecutive three month period identified by the City.

3.0 Related Policies

- 3.1 Guidelines for Use of City Facilities and Equipment, August 1999, Ethics and Elections Commission, City of Seattle Inweb.
- 3.2 City of Seattle Rules & Procedures No. 05-11, Requests for Telephone and Data Management System Information and Digital Evidence Investigations, dated November, 2005.

4.0 Policy

- 4.1 Departments should give long-distance access to only those employees’ telephones that require the ability to call long-distance as part of their normal work activity.
- 4.2 DoIT will generate a monthly summary of phone use.
- 4.3 Department supervisors are responsible for reviewing summary phone use reports and identifying individual phone use that exceeds expectations for that employee position.
- 4.4 DoIT will generate detailed use reports that include local call detail, as requested by departments, for individual phone use identified by a supervisor as exceeding expectations for the position in accordance with City Rules and Procedures Number 05-11.
- 4.5 Employees will limit personal phone use except for occasional use that does not interfere with City work.
- 4.6 Supervisors will take appropriate disciplinary actions for employees who do not limit their personal use of City phones.
- 4.7 The Ethics and Elections Commission can levy fines for excessive personal use of City phones.
- 4.8 Employees should use personal prepaid phone cards for personal long-distance calls.



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- 4.9 The City recognizes that employees occasionally must use City telephones or cell phones to accommodate the demands of daily living and that they may not have a prepaid phone card readily available.
- 4.10 Employees will reimburse the City for all personal use plus a \$9.00 processing fee only when the total cost of their personal combined phone activity exceeds \$9.00 in a quarterly accounting period. For example, if personal combined phone activity is \$9.25 in a quarterly accounting period, the employee will reimburse the City \$18.25. Alternatively, if personal combined phone activity is \$8.75 during a quarterly accounting period, then the employee need not reimburse the City.

5.0 Procedures

- 5.1 Each City Department will provide the name, telephone, fax number, and mail stop of its Telephone Coordinator annually and as amended thereafter.
 - 5.1.1 This can be accomplished by either e-mail or written memorandum signed by the Department Director, or authorized delegate, and delivered to assigned DoIT Telephone Analyst or Work Order Coordinator.
 - 5.1.2 The Telephone Coordinator will indicate what telephones are allowed long distance access via a Move, Add, or Change (MAC) form sent to DoIT.
- 5.2 Generation of phone use reports
 - 5.2.1 DoIT will prepare monthly reports containing relevant information for the oversight of phone use including a departmental summary of local and long distance telephone and cell phone use.
 - 5.2.2 At the request of Departments and in accordance with City Rules and Procedures No. 05-11, DoIT will provide additional information on individual lines for any use exceeding supervisor expectations for the position.
- 5.3 Supervisors are responsible for reviewing phone bills
 - 5.3.1 Supervisors will review the statements on a regular basis and no less than once quarterly.
 - 5.3.2 Supervisors will look for users who exceed use expectation for their position and will request from DoIT detailed phone use records.
- 5.4 Employees will make minimal personal use of City telephones and cell phones



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- 5.4.1 At the request of his or her supervisor, an employee shall review his or her telephone use report. The employee shall identify every personal call and verify, in writing, that the remaining calls were related to City business. The employee must reimburse the Department for the cost of personal calls only if the employee's personal combined phone activity results in costs exceeding \$9.00 during a quarterly accounting period. Employees will also pay a \$9.00 processing fee with their reimbursement. Upon reviewing telephone use reports, if an employee identifies a long distance call(s) charged to their telephone that such employee did not make or authorize, the employing department will remove those charges from the employee's bill unless an investigation reveals that the employee did make the disputed call(s).
- 5.4.2 Excessive personal use of City telephones may result in disciplinary action. An employee may obtain relevant records regarding his or her personal combined phone activity which are the basis for proposed disciplinary action against the employee. To obtain relevant records, the employee shall make a written request to his or her appointing authority. When a request for records is received, the appointing authority, or his or her designee, shall provide the records requested.
- 5.4.3 Excessive personal use of City telephones may also result in fines from the Ethics and Elections Commission. An employee may obtain relevant records regarding his or her personal combined phone activity which are the basis for a proposed fine against the employee. To obtain relevant records, the employee shall make a written request to his or her appointing authority. When a request for records is received, the appointing authority, or her or her designee, shall provide the records requested.

6.0 Wireless Communication While Operating a City Motor Vehicle

- 6.1 This policy is hereby amended to ensure that City of Seattle telephone policy is consistent with Washington State law. For purposes of this section "hands-free mode" means the use of a wireless communication device, i.e. cell phone or BlackBerry, with a speaker phone, headset or earpiece.

Per the new Washington State Law effective July 1, 2008, a person operating a moving motor vehicle while holding a wireless communication device to his or her ear is guilty of a traffic infraction.

The new law does NOT apply to a person operating:



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- An authorized emergency vehicle, or a tow truck responding to a disabled vehicle;
A moving motor vehicle using a wireless communications device in hands-free mode; or
A moving motor vehicle using a hand-held wireless communication device to
1. Report illegal activity,
2. Summon medical or other emergency help,
3. Prevent injury to a person or property.

This new provision is a secondary action when a driver of a motor vehicle has been detained for a different, suspected violation by law enforcement officers.

As of January 2008, it is also illegal to text message while driving. Again this is a secondary action.

Any fines imposed on a City employee in violation of these new laws shall be the sole responsibility of said City employee.

Document Control

Owning Organization: DoIT, Telephone Services

Reviewed: Reviewed and accepted by the City Auditor, Ethics and Elections Commission, IMB, and Technology Council.

Initially Adopted: Adopted by CTO effective July 1, 2007 for Citywide use.

Update Cycle: To be reviewed annually for possible changes by DoIT, Telephone Services, and the City CTO or considered for change at any time if requested.

Record of Versions:

Table with 3 columns: Version, Content, Status/Comments. Row 1: V 2.0, Hands-free phone use, 06/25/08.



City of Seattle

IT Policy

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Authorized this 17th day of July, 2007 by:

A handwritten signature in black ink that reads "William M. Schrier".

William M. Schrier
Chief Technology Officer
City of Seattle