



**Audit of
Use of Personal Communication Devices (PCDs)**

October 2018

**Leon County Schools
Office of Internal Auditing**

Summary of Audit Results

Finding	Recommendation	Management Response
<p>Finding 1: Some Cellular Phone Request Forms were missing or incomplete.</p>	<p>We recommend that District staff implement a process to ensure that Cellular Phone Request Forms are properly completed and maintained as a part of the District’s official records prior to issuance or transfer of any PCD.</p>	<p><i>District staff will continue to require that an authorized Form is submitted prior to the issuance of a new PCD. The receipt of an authorized Form will be required to transfer responsibility of an open PCD line of service.</i></p>
<p>Finding 2: Cellular telephones were issued to individuals who were not regularly established employees of the Leon County School District and to individuals who were no longer employed with Leon County Schools.</p>	<p>We recommend that District staff maintain accurate and up to date documentation to support all active district issued PCDs. Further, we recommend that the District further clarify and document the steps that must be taken when an employee must return a district issued PCD. Additionally, District staff should clarify and document whether issuance of devices to individuals working with the district through a temporary service is allowable or prohibited.</p>	<p><i>The Policy & Planning Department will meet with the respective policy stakeholders to revise current policy and administrative procedural language to provide uniform and consistent standards for the application and use of PCDs, including but not limited to compliance with eligibility; documenting the distributions and returns of any District issued PCDs; and routine monitoring of active District issued PCDs.</i></p>
<p>Finding 3: Some cellular telephones were not issued to a specific employee as required by policy.</p>	<p>We recommend that District staff issue cellular telephones in accordance with the guidance outlined in LCSB Procedure 7530.01.</p>	<p><i>District staff will require identification of a specific user for all new PCD lines of service.</i></p>
<p>Finding 4: Some District employees were not consistently adhering to the reimbursement guidelines as outlined in LCSB Procedure 7530.01.</p>	<p>We recommend that reimbursements are consistently submitted and processed as outlined in LCSB Procedure 7530.01. We further recommend clarification of guidance related to reimbursement of expenses for text messages, instant messages or e-mails send or received. Clarifying language should document reimbursements rates for the aforementioned transaction types.</p>	<p><i>The Policy & Planning Department will met with respective policy stakeholders to revise current policy and administrative procedural language to provide uniform and consistent standards for the application and use of PCDs, including but not limited to implementing appropriate corrective or disciplinary action if an employee is found to be in violation of the tenets of Board policies and administrative procedures.</i></p>

History

Per Leon County School Board (LCSB) Policy 7530.01- Staff Use of Personal Communication Devices (PCDs), PCDs include computers, tablets, electronic readers, cell phones, smartphones and/or other web-enabled devices of any type. Leon County Schools (LCS) provides PCDs to employees who by the nature of their job have a routine and continuing business need for the use of such devices for official Board business. LCSB guidance governing the issuance and use of such devices is provided in LCSB Policy and Procedure 7530.01.

The responsibility for issuance of PCDs and maintenance of the required documentation as outlined in policy is entrusted to the Purchasing Department. Based on documentation provided as of April 2018, there were 785 PCDs. Device types and specific quantities are outlined in the table below:

Device Type	# of Devices
Data Lines (Smart Phones, Tablets, and Personal Hot Spots)*	152
Voice Lines (Cell Phones without Data Capabilities)*	73
Maintenance Push-To-Talk *	126
Transportation Air Cards	9
Transportation Bus GPS	280
Maintenance White Fleet GPS	139
Maintenance Air Cards	6
Total	785

*Shaded cells represent devices that are included as a part of the audit universe for purposes of this review.

Verizon Wireless is the current cellular telephone service provider for LCS. Based on monthly billing statements the expenses for Data, Voice and Push-To-Talk cellular telephone services for the 2016-2017 and 2017-2018 fiscal years were \$103,462.62 and \$103,326.47 respectively. These figures do not include any expenses incurred for Transportation or Maintenance Air Cards or Bus/White Fleet GPS.

Purpose

The purpose of this review is to determine compliance with relevant governing authorities for a subset of the total PCD population. Primary focus will be compliance with relevant district policies for issuance and use of Voice, Data, & Push-To-Talk Devices. Based on the shaded information outlined in the table above, as of April 2018 the District had 351 PCDs meeting the established audit criteria.

The audit review period included all active devices during the 2016-2017 and 2017-2018 fiscal years. A review of all relevant documentation to determine compliance with relevant LCSB guidance. Specific emphasis was placed on eligibility requirements, maintenance of required documentation and adherence to established reimbursement procedures.

Conclusions

Upon conclusion of the audit fieldwork, the following findings and recommendations are provided.

Finding 1: Some Cellular Phone Request Forms were missing or incomplete.

LCSB Procedure 7530.01 states that the issuance of a cellular device is contingent upon a request from the employee's supervisor. The supervisor must make the request on the LCS Cellular Phone Request Form "the Form". The Form should be completed and approved before issuance of the device to an employee. It must include the employee's name, school/department, date of request, justification for participation, supervisor's name and signature approving the request, proper budget coding and employee's acknowledgement and signature of receipt and review of LCSB Policy and Procedure 7530.01.

After a comprehensive review of a list of all current cellular telephone holders, it was determined that documentation could be enhanced. Some of the concerns noted are listed below.

Many of the cellular telephones included on the active list did not have a corresponding Form on file. In addition, many of the Forms were not properly completed. Some of the most commonly excluded information was approval signatures, documented justification for issuance and proper line of coding for funding purposes.

The Purchasing Director confirmed that in many instances a department/school site administrator will submit an email requesting reassignment of a cellular device to another employee without completing a new Form. The reassignment of devices without obtaining a properly completed Form from the new device holder exposes the district to the risk of unintentional misuse. Unintentional misuse of a device by the new device holder could result due to lack of understanding of established guidelines for use. Given that acknowledgement of review and understanding of established guidelines is a required element of the Form, it is essential that it is obtained for all active cellular telephone lines.

Further, incomplete or missing Forms could lead to unintentional issuance of devices to employees who do not meet eligibility requirements. Another critical component of the Form is that it is used as a means to provide assurance that employees meet all eligibility requirements.

Recommendation:

We recommend that District staff implement a process to ensure that Cellular Phone Request Forms are properly completed and maintained as a part of the District's official records prior to issuance or transfer of any PCD.

Management Response:

District staff will continue to require that an authorized Form is submitted prior to the issuance of a new PCD. The receipt of an authorized Form will be required to transfer responsibility of an open PCD line of service.

Finding 2: Cellular telephones were issued to individuals who were not regularly established employees of the Leon County School District and to individuals who were no longer employed with Leon County Schools.

LCSB Policy 7530.01 states that PCDs will be provided to employees who by the nature of their job have a routine and continuing business need for the use of such devices for official Board business. It further establishes additional criterion that must be met for issuance of a cellular telephone. Additionally, LCSB Policy 7530.01 requires the return of Board-owned PCDs and termination of the corresponding wireless service plan when it is no longer justified by business requirements, the employee leaves the Board's employment, and/or when the employee has demonstrated a disregard for the limitation of relevant policy.

After a comprehensive review of a list of all current cellular telephone holders, it was determined that cellular telephones had been issued to 7 individuals who were not LCS employees. These individuals were working with the maintenance department through a temporary agency. Individuals working with LCS through an agreement with a temporary agency are not listed as employees in the human resource system. At the time of audit fieldwork, six of these individuals were still actively working with the LCS through the temporary agency. One of the individuals no longer provided services through the temporary agency. The policy and/or corresponding procedure provides guidance for issuance of devices to employees but is silent regarding issuance of cellular telephone devices to individuals who are not employees of LCS.

It was also determine that 10 individuals who had been regularly established LCS employees were no longer employed with the school district; however, their names remained on the list of active cellular telephone holders. Employment status for each of these prior LCS employees was obtained via the human resource system. Each of these individuals had a termination date or last check date documented in the system that evidenced their separation date. After consultation with the Purchasing Director, it was determined that the active service plans for each of these individuals had been terminated and all cellular devices had been returned.

After discussions with LCS personnel and a comprehensive search of the online forms database, it was determined that there is an Employee/Supervisor Exit Checklist. The Checklist includes a section that must be completed to evidence return of cellular devices. After additional research, it was determined that there is not a LCS policy or procedure governing the use of this form. Further, the Purchasing Director indicated sporadic receipt of the Checklist when employees terminate/separate from LCS employment. The form is not provided to the Purchasing Department with every employee termination/separation.

Although, the Purchasing Director noted that most of the phones are returned or purchased from LCS at cost; the inconsistent usage of this form and the absence of a formalized procedure could negatively impact the program. Among the negative impacts would be the risk of not recovering all District issued cellular devices and incurring additional expenses for unauthorized usage of said devices. Further, staff changes could impact the consistent application of the current practice without a documented procedure to provide continued guidance.

Recommendation:

We recommend that District staff maintain accurate and up to date documentation to support all active district issued PCDs. Further, we recommend that the District further clarify and document the steps that must be taken when an employee must return a district issued PCD. Additionally, District staff should clarify and document whether issuance of devices to individuals working with the district through a temporary service is allowable or prohibited.

Management Response:

The Policy & Planning Department will meet with the respective policy stakeholders to revise current policy and administrative procedural language to provide uniform and consistent standards for the application and use of PCDs, including but not limited to compliance with eligibility; documenting the distributions and returns of any District issued PCDs; and routine monitoring of active District issued PCDs.

Finding 3: Some cellular telephones were not issued to a specific employee as required by policy.

LCSB Policy 7530.01 references providing PCDs to employees. The policy further details criteria for eligibility based upon specific job duties and responsibilities. Information regarding the process necessary to issue cellular phones identifies consequences of misuse and details the process for reimbursement of personal calls. The employee must also evidence understanding of established guidelines by reviewing and signing the required documentation.

After a comprehensive review of a list of all current cellular telephone holders, it was determine that 32 active cellular telephones were not issued to a specific employee as outlined in policy. Fifteen (15) of these lines were documented as spare lines and 17 of the lines were issued on behalf of a department or school site. Requirements in policy related to acknowledgment of guidelines for usage, responsibility for damage or misuse and reimbursement for personal calls would be extremely difficult to implement and track without having a specific employee associated with each active line of service.

Further, when reviewing the information on the Form, it was often difficult to accurately determine the individual responsible for each device. The cell phone procedure requires the name of the employee who will be using the cellular phone. However, the Form includes a field entitled "Name of Requestor" and doesn't reference employee name. During audit fieldwork, it was observed that "Name of Requestor" field was used inconsistently. In some instances, the field captured information for the actual user of the device and in other instances; it captured information for the supervisor of the device users. This inconsistency made it difficult to accurately determine the individual in possession of the phone and the responsible party with regard to reimbursement of non-business expenses or expenses due to misuse.

Recommendation:

We recommend that District staff issue cellular telephones in accordance with the guidance outlined in LCSB Procedure 7530.01.

Management Response:

District staff will require identification of a specific user for all new PCD lines of service.

Finding 4: Some District employees were not consistently adhering to the reimbursement guidelines.

LCSB Policy 7530.01 requires employees to reimburse the Board for non-business use. The employee must review the monthly statement for billing accuracy, then sign and date it verifying the employee's review. A copy of the signed and dated statement is to be submitted to the Superintendent within 60 days of receipt of it by the employee. In accordance with procedure, if a personal call is made or received, or a text message, instant message or e-mail of a personal nature is sent or received on the employee's Board-owned PCD, the employee shall be billed for the cost of the personal calls made or received, or the text messages, instant messages or e-mails sent or received. LCS Procedure 7530.01 further details the actual steps that must be taken by each employee and defines the reimbursement rate for personal calls at \$.05 per minute. The employee must note the purpose of any long distance calls; identify personal calls and provide payment for such personal calls.

After a comprehensive review of a list of all current cellular telephone holders, it was determined that some employees were not adhering to established reimbursement guidelines. Reimbursements were not submitted on a monthly basis as required by procedure. Often, employees submitted multiple months of cellular telephone reimbursement forms at once. Further, there were numerous instances where reimbursement forms were not submitted for many active cell phone lines. Some reimbursement forms submitted to finance were incomplete. The most common omissions were supervisor's signature, month/year of statement, cell phone number and notes indicating the purpose of long distance calls.

The policy nor procedure provides guidance regarding the reimbursement rate for non-business related text messages, instant messages or e-mails sent or received. Per policy reimbursements are required for non-business expenses related to the aforementioned items; however, incomplete documentation and the absence of guidance detailing the reimbursement rates could cause inconsistency when attempting to apply the reimbursement requirements.

Recommendation:

We recommend that reimbursements are consistently submitted and processed as outlined in LCSB Procedure 7530.01. We further recommend clarification of guidance related to reimbursement of expenses for text messages, instant messages or e-mails send or received. Clarifying language should document reimbursements rates for the aforementioned transaction types.

Management Response:

The Policy & Planning Department will met with respective policy stakeholders to revise current policy and administrative procedural language to provide uniform and consistent standards for the application and use of PCDs, including but not limited to implementing appropriate corrective or disciplinary action if an employee is found to be in violation of the tenets of Board policies and administrative procedures