United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

JUN 14 2000

MEMORANDUM

TO: Solicitor
Inspector General
Assistant Secretaries
Bureau and Office Heads

FROM: John Berry
Assistant Secretary - Policy, Management and Budget

SUBJECT: **POLICIES ON LIMITED USE OF GOVERNMENT EQUIPMENT AND TELEPHONE USE**

Attached is the Department's new limited use policy concerning personal use of office equipment and library collections. This policy provides employees with the opportunity to use Government office equipment and library collections for some personal purposes during non-duty time. Employees continue to have a duty to protect and conserve Government property and shall not use such property, or allow its use, for other than authorized purposes. Limited personal use of certain office equipment (described in the policy) is authorized as long as it occurs on non-duty time, does not interfere with official business, is not a commercial gain activity or otherwise prohibited, is of negligible expense, and is used in compliance with the attached policy. These limited personal uses, as set out in this policy, are "authorized uses" of Government property under 5 CFR 2635.101(b)(9) and 2635.704(a), and will be included in Chapter 410 of the Departmental Manual.

This policy:

- incorporates the principles of the Department's current Internet Acceptable Use policy, which allows employees to use the Internet during non-duty time to develop or enhance search and retrieval skills if the use of the Internet will not cost the Government an additional fee, will not strain resources or reduce productivity, and will not bring discredit on the Department of the Interior. See the Internet Acceptable Use Policy (IRM Bulletin 1997-00, available on DOI home page, http://www.doi.gov/oirm/bulletins).

- allows limited point-to-point (not broadcast transmissions or mass mailings) e-mail transmissions during non-duty time for personal use. Broadcast transmissions and mass mailings are generally prohibited because they can result in decreased storage space and other system problems that can increase the cost of operating the Government system.

Managers can place additional restrictions on the use of Government property for personal purposes only for instances of abuse of this policy or in order to meet management needs and mission objectives. Managers should strive to apply this policy consistently and fairly among all employees and should make any limits on the application of this policy clear to their employees.

The Department is responsible for fostering high ethical standards for employees, and for strengthening the public's confidence that the Government's business is conducted with impartiality and integrity. Therefore, employees are to use this limited authorization judiciously and appropriately and should check with their supervisors if they have any questions about the application of this policy.

We live in an era of rapidly changing technology. It is my hope that this policy will assist employees to improve their skills in our ever-changing work environment. I trust this new flexibility will help our employees to be more productive and enhance the quality of their workplace.

Also attached is the Department's Telephone Use Policy, which will be issued as an Information Resources Management Bulletin. This policy allows employees to use Government-provided communications equipment and services for official business, and for personal calls during duty hours that are necessary and in the interest of the Government. Personal calls made during duty hours must not adversely affect the performance of an employee's official duties or the organization's work performance, and must be of reasonable duration and frequency.

Penalties for misuse or abuse related to these policies will be in accordance with the U.S. Department of the Interior Handbook on Charges and Penalty Selection for Disciplinary and Adverse Actions. Selection of the penalty should be the least severe penalty necessary to correct misconduct and to discourage repetition. However, it is important to note that the supervisor retains full authority to set penalties as he/she deems appropriate based on the particular circumstances of the offense. Corrective action covers a full range of remedies which may include oral and/or written warnings or reprimands, suspension without pay, or removal from Federal service. In the case of a serious offense where a formal action may be taken, supervisors should consult with their Human Resources office immediately.

If you should have any questions or need clarification of this policy, your staff may contact the Office of Acquisition and Property Management, Terri Barry on (202) 208-4328, e-mail at teresa_barry@os.doi.gov, or Chris MacArthur on (202) 208-6649, e-mail at chris_macarthur@os.doi.gov. If you should have questions or need clarification on the application of this policy, please contact Departmental Ethics Office, TJ Sullivan on (202) 208-7960, e-mail at tj_sullivan@ios.doi.gov.

Attachments

U.S. Department of the Interior
Telephone Use Policy

Purpose

This policy provides guidance on the use of Government-owned, -leased, and -managed telecommunications systems, cellular telephones, Federal Calling Cards, and pre-paid calling cards. It addresses cost recovery procedures and other management considerations.

Scope

This policy applies to all Department of the Interior (DOI) employees and covers DOI contractors unless they are specifically excluded under the terms of their contract.

Background

Regulatory changes in the telecommunications industry have resulted in increased competition and rapid technological developments. Many telecommunications services and products have improved and are now available at low costs. These changes have improved administrative efficiency, effectiveness, and ability to meet mission requirements in remarkable ways.

Lower per-minute costs for traditional long-distance services have influenced the relaxation of Federal regulations. The Information Technology Management Reform Act (ITMRA) and the Government Performance and Results Act (GPRA) have changed the Government's perspective on Information Technology (IT) Management. DOI Telecommunications management policy, as published in the Departmental Manual, 377 DM 1, Telecommunications Management, will be updated to include this telephone use policy.

General Principles

Telecommunications services are used to support the mission of the Department. When acquiring telecommunications resources, managers must consider all viable alternatives and the need and opportunity for inter-operation and compatibility with public and Government telecommunications systems and services. When it is cost effective, bureaus shall share telecommunications systems, services, and facilities with other bureaus and agencies to the maximum extent practical. Telecommunications support and services shall be provided at a minimum total cost consistent with requirements for capacity, inter-operability, and reliability. Telecommunications services and systems are Government resources, and as such, are to be managed in the most cost-effective manner possible and in the interest of the Government. DOI managers have flexibility in determining how this objective can be achieved and may accommodate employee personal needs to the extent they are not inconsistent with agency needs. Reasonableness and common sense shall be the guiding principles in all situations.

Responsibilities

The Office of Information Resource Management (PIR) is responsible for overseeing and providing guidance for the acquisition, development, management, and use of information resources Department wide. The PIR Telecommunications Systems Division develops and implements Department wide telecommunications policies, standards, and guidelines, and provides assistance to bureaus and offices in the acquisition, operation, and use of telecommunications facilities and services.

Telecommunications managers and employee supervisors are responsible for reasonable review of telecommunications bills, billing exception reports, financial system cost data, and other similar information. To accomplish this, managers and supervisors must define office practices consistent with this guidance, develop techniques to determine whether telecommunications bills are reasonable and within expected thresholds, and investigate irregularities when it makes good business and economic sense to do so. Given the relatively low cost of modern telecommunications services, DOI managers need not perform detailed reviews of bills as long as the criteria or dollar thresholds are defined where closer scrutiny will occur. The servicing Human Resources Office should be contacted for assistance in notifying local union representatives of plans to establish local policies and practices, and for fulfilling any labor relations obligations.

Guidelines

Using Government-Provided Telecommunications Resources:

Employees shall use Government-provided communications equipment and services for official business, but may make and receive personal calls during duty hours that are necessary and in the interest of the Government. Examples of personal calls that are in the interest of the Government are: calls to alert household members about working late or other schedule changes; calls to make alternative child care arrangements; calls to talk with doctors, hospital staff, or day care providers; calls to determine the safety of family or household members, particularly in an emergency; calls to make funeral arrangements; calls to reach businesses or Government agencies that can only be contacted during work hours; and calls to arrange emergency repairs to vehicles or residences.

Personal calls made from Government telephones must not adversely affect the performance of employee's official duties or the organization's work performance; must be of reasonable duration and frequency; and could not reasonably have been made during non-duty hours.

Employees may make and receive a limited number of purely personal calls during duty hours (purely personal calls are those determined <u>not</u> to be necessary in the interest of the Government) from Government telephones when those calls do not incur additional charges to the Government. In making purely personal calls, employees shall ensure that: all long-distance calls are made at their own expense; e.g., charged to personal calling or credit cards, home telephones, or other non-Government telephone numbers; the calls do

not adversely affect the performance of official duties or the organization's work performance; and the calls are of reasonable duration and frequency.

Employees may not make purely personal long-distance calls expecting to reimburse the Government later.

Reasonableness Determinations for Telephone Call Duration and Frequency:

Supervisors and managers shall determine whether brief personal telephone calls are of reasonable length, and in the interest of the Government, based on employees' work schedule, co-worker needs, office work demands, length of work day, etc. Personal calls in excess of three times a day, and longer than 10 minutes each are normally to be considered unreasonable.

Using Government Telecommunications Resources when Traveling:

Official Business Calls: Employees are expected to use Federal Calling Cards or pre-paid calling cards for long-distance calls while on official travel. Use of cellular telephones is allowable to conduct Government business while on travel. Supervisors should ensure that Federal Calling Cards or pre-paid calling cards are provided personnel who travel.

Calls Home: Employees on official overnight travel status are allowed to make a brief daily personal call but they should do so using least-cost-to-the-Government methods, such as, by using available Government telephones, Federal Calling Cards, or pre-paid calling cards. Employees may be reimbursed on travel vouchers for daily personal calls charged to hotel rooms but these calls should not normally be made in this manner because of their high costs.

Calls To Other than to Home: Other necessary long-distance calls may be made using Government-provided calling cards. These are calls that must be made before employees return from travel. In most cases, these calls would have been made from home or office phones if the employees were not in travel status (see examples cited in first paragraph under Guidelines).

Calling Home using Cellular Telephones: Except in unusual circumstances, wireless services shall not be used to telephone home, or to make calls listed in the first paragraph under "Guidelines," at Government expense, when on official travel.

Calls from Commercial Airplanes: Calls from commercial aircraft must be approved prior to travel on the employee's travel authorization. If specifically authorized to do so for business purposes, employees should make domestic airborne calls using Government travel cards or Federal Calling Cards.

Cost Recovery for Unauthorized Telephone Calls and Disciplinary Action:

When telecommunications abuse occurs, there are two concurrent considerations: the recovery of DOI's charges and administrative costs to rectify telecommunications management program abuses; and disciplinary action for misconduct in accordance with applicable regulations and the DOI's Personnel Handbook on Charges and Penalty Selection for Disciplinary and Adverse Actions.

Employees making unauthorized long distance or cellular telephone calls may be charged for the cost of the call, rounded to the nearest dollar, plus associated administrative recovery costs if the calls are determined to be egregious. DOI managers and supervisors should consult with their servicing Human Resources Office to make these determinations. Reimbursements shall be made by personal check or money order, payable to the DOI, and forwarded to the Bureau/Office finance office for deposit. Include with any deposit a memorandum indicating that payment is for reimbursement of personal use of telecommunications chargeable resources and associated administrative costs, if applicable.

Disciplinary action for misconduct may be pursued, up to and including removal from office. Supervisors should consult with their serving Human Resources Office to determine appropriate corrective action.

Federal Calling Cards/Pre-Paid Calling Cards:

Employees who frequently travel must obtain and use a Federal Calling Card to make authorized calls. Federal Calling Cards can only be ordered by bureau/office FTS2001 ordering agents who are DOI Designated Agency Representatives (DAR). For network security reasons, Federal Calling Cards should be in the individual's name, and should not be shared. Typically, this precludes assigning cards by specific office, position, or other designated title. Offices must track all Federal Calling Cards and cancel them when employees terminate. Regaining physical possession of the card is insufficient control. In addition to the Federal Calling Card, pre-paid Calling Cards may also be obtained for this purpose.

If a Federal calling card is lost, stolen, or otherwise compromised, employees must promptly report the incident to the vendor using the toll-free number on the reverse of the card, or to the provider's toll-free number obtained from directory assistance. In addition, the ordering DAR must be notified. Employees will not be held liable for unauthorized calls made by unknown third parties if the lost or stolen cards are reported promptly.

Cellular Telephones and Wireless Telecommunications Services:

Wireless services, such as intelligent pagers, satellite phones, cellular, and Personal Communications Systems (PCS) technology, shall be used and managed as a telecommunications service and a DOI resource. Wireless equipment and services shall

be ordered when there is a business need for calls to be made or received while the employee is away from their office. Wireless technologies may also offer affordable emergency backup telephone services. When ordering wireless services, care must be taken to analyze all billing options to ensure the most economical billing plan is selected and based on business use of the service. Periodically, billing plans shall be reviewed and compared to newer and usually more economical plans. Applicable roaming charges need to be considered and factored as part of the analysis.

Employees shall be particularly diligent and use wireless services only when required to do so for official business or when the calls are in the interest of the Government. Employees should use non-wireless services if they are readily available.

Employees should not expect reimbursement when using personal wireless services for Government business without prior approval of managers and supervisors. If an office's employees have recurring needs for wireless services and if cost-benefit reviews support the requirement, the office should consider acquiring Government-owned wireless technologies that can be checked out or assigned employees on an as-needed basis.

Collect Calls:

Employees shall not normally accept collect calls for business or personal purposes unless the caller indicates it is an emergency call or there are other extenuating circumstances.

900 Numbers:

Employees shall not make calls at Government expense to 900 numbers. Many Government and commercial systems block outgoing calls to 900 numbers. In instances where technical assistance is only available using 900 numbers, DOI offices shall specify and use lines where 900 numbers have not been blocked to place these calls.

Directory Assistance Calls:

Employees are encouraged to use telephone directories or Internet directory web sites to determine business-related telephone numbers rather than routinely calling fee-based directory assistance operators.

International Calls:

DOI offices shall use cost-effective telecommunications services to contact locations outside the contiguous United States and overseas. Access to international telephone services should be restricted to only those employees who require such services as part of their official duties.

Telephones in Homes:

Government regulations generally do not allow installation of telephone services or equipment, including data lines, in private residences at Government expense unless employees are working under approved Flexiplace or Work-at-Home Agreements.

Listening-In On or Recording Telephone Calls:

Employees are prohibited from listening-in or recording telephone conversations except under limited circumstances. Listening-in or recording telephone conversations is permissible only in accordance with the Departmental Manual (See 377 DM 1; 377 DM 2 (Telephone Systems Handbook, Chapter 8)) or otherwise in accordance with law. When speaker-phones or other audio teleconference equipment are used, all parties must be informed of the names or number of persons listening-in.

Employment Changes:

When DOI employees leave Government service or transfer to other agencies, they must return Federal Calling Cards, pre-paid calling cards, wireless devices, and all other Government issued equipment.

Privacy Act:

DOI has established a Privacy Act System of Records on Telephone Call Detail Records, INTERIOR/DOI-36. It covers telephone call detail records that specify calling and called telephone numbers, telephone numbers identified by employee name(s) and equipment locations, including personnel and administrative actions that result from telephone abuse. All Privacy Act procedures and safeguards must be followed in handling telephone call detail records. Specifically, the records must be secured, and restricted to DOI managers and personnel who have a need for the records in the performance of their duties. Managers and personnel who handle these records must maintain a copy of INTERIOR/DOI-36 and be familiar with its content.

Billing Reviews:

Telecommunications managers shall identify reasonable dollar thresholds, sampling methodology, screening techniques, or some other method for determining when telecommunications bills will be reviewed more closely. Problem indicators typically include widely varying monthly bill totals, large numbers of non-Government calls, long or repeated calls made before and after work hours, and large numbers of directory assistance calls. Long hold time calls (callers left on hold for extended periods) should also be reviewed to determine if they are transmissions that could be aggregated or redirected to reduce costs. Managers must investigate and resolve billing irregularities which exceed established thresholds.

Telecommunications Use and Electronic Commerce and Administrative Support Systems:

> Whenever possible, DOI offices shall use electronic ordering and billing practices for procuring telecommunications services and products, and consolidate telecommunications bills. These practices support DOI's electronic commerce goals and improve administrative efficiency.

References

Public Law 104-106, The Information Technology Management Reform Act (ITMRA), Division E, effective February 10, 1996.

Public Law 103-62, the Government Performance and Results Act (GPRA) of 1993.

Title 31 United States Code, Section 1348 (1/05/99), Telephone Installation and Charges.

General Services Administration's Federal Property Management Regulations (FPMR), part 101-35 of title 41 of the Code of Federal Regulations (41 CFR 101-35), Telecommunications Management Policy.

DOI Departmental Manual 377 DM 1, Telecommunications Management, dated October 3, 1991.

DOI Departmental Manual 377 DM 2, Telephone Systems Handbook, dated January 4, 1985.

Privacy Act of 1974, as amended (5 U.S.C. 552a). Privacy Act System of Records on Telephone Call Detail Records, INTERIOR/DOI-36.