Personal Cell Phone Use and Reimbursement Policy

Effective Date

11/9/2026

Purpose

The Northeast Iowa Workforce Development Board (NEIWDB) recognizes that Board staff work remotely and travel for meetings, outreach, and other Board activities. Personal cell phones provide a necessary means of communicating with Board members, chief elected officials, workforce partners, service providers, and others.

This policy establishes requirements for reimbursing eligible individuals for the business use of their personal cell phones.

Policy

I. Scope and Eligibility

This policy applies to individuals assigned to perform Northeast Iowa Workforce Development Board (NEIWDB) staff functions, including staff employed through NEIWDB's employer-of-record arrangement, whose duties require regular use of a personal cell phone for NEIWDB business.

Eligibility is based on a documented business need, which may include:

- Making and receiving business calls and text messages.
- Accessing Board email and other approved business applications.
- Maintaining communication while traveling or attending meetings and events.
- Being reasonably accessible during established work hours or scheduled Board activities.

Working remotely does not, by itself, establish eligibility.

This policy does not extend to Board members, employees of service providers or partner organizations, or employees of the fiscal agent who are not assigned to perform NEIWDB Board staff functions.

II. Monthly Reimbursement

Eligible staff may receive a recurring monthly reimbursement of $60 combined for required business use of their personal cell phone and approved mobile hotspot service. The authorized amount must be supported by documented business need and reasonable service costs and may not exceed the staff member's actual eligible monthly service expenses.

Eligible service costs include voice, text, data, and mobile hotspot service necessary to perform NEIWDB responsibilities. Hotspot service may be included in the staff member's cell phone plan or provided through a separate mobile hotspot service plan. Service included in an existing plan may not be counted as a separate additional expense.

For family or shared plans, supporting documentation must identify the staff member's line and a reasonable share of any common service charges, after applicable discounts and credits. Other household members' charges are not eligible.

The reimbursement does not cover home internet service, device purchases or installment payments, accessories, insurance, repairs, late fees, or cancellation charges.

The approved amount will be established before payments begin and reviewed at least annually under Section III. Reimbursement supports required NEIWDB business use and is not additional compensation or a substitute for wages.

Reimbursement begins upon written approval, no earlier than this policy's effective date. Partial months will be prorated based on calendar days of eligibility.

Exceptional expenses require advanced written approval identifying the expense, amount, business purpose, and funding source. The Executive Director may approve staff exceptions. Exceptions requested by the Executive Director require approval by the Board Chair or designated Board representative.

III. Approval and Documentation

The Executive Director will review and approve staff requests, including the business need, reimbursement calculation, and maximum approved monthly amount. The Board Chair or designated Board representative will approve requests submitted by the Executive Director. Individuals may not approve their own eligibility, reimbursement claims, or exceptions.

Before reimbursement begins and at least annually thereafter, staff must complete Attachment A, Annual Cell Phone and Hotspot Reimbursement Certification, and provide a current billing statement supporting the requested monthly amount. The certification must be reviewed and approved in accordance with this section.

Required documentation includes:

- A description of the business need for personal cell phone and/or mobile hotspot service, included in Attachment A.
- A current billing statement or statements identifying the applicable phone line and/or mobile hotspot plan, active service, and eligible monthly service costs.
- Personal information unrelated to verification may be redacted.

- Certification that the same expense is not reimbursed through another employer, board, organization, or contract.

Eligibility and supporting documentation will be reviewed at least annually. Individuals must promptly report changes in service, cost, duties, or other reimbursement that may affect eligibility. Personal information unrelated to verification may be redacted.

IV. Individual Responsibilities

Individuals receiving reimbursement must:

- Maintain active service sufficient for their approved Board responsibilities.
- Provide a current contact number and report changes promptly.
- Remain reasonably accessible during established work hours and scheduled Board activities.
- Protect Board information through appropriate device security, including a passcode and current security updates.
- Promptly report loss, theft, or unauthorized access that could compromise Board information.
- Preserve and provide Board business communications as required by applicable records retention and public records requirements.
- Follow applicable NEIWDB and employer-of-record confidentiality, information security, acceptable-use, and records-retention requirements. Before replacing a device or ending employment, coordinate the preservation and transfer of Board business records and removal of Board accounts and information.

Receiving reimbursement does not establish an expectation of continuous or around-the-clock availability.

The individual retains ownership of the device and responsibility for the service agreement.

V. Fiscal Administration

Payments are subject to available funding and applicable grant requirements. Costs charged to federal awards must be necessary, reasonable, adequately documented, consistently treated, and allocated according to the benefit received. The fiscal agent will allocate approved expenses among benefiting funding sources in accordance with NEIWDB's approved cost allocation plan and classify costs as administrative or program costs based on the functions supported. The same expense may not be charged both directly and through an indirect-cost allocation.

When an individual serves multiple boards or organizations, reimbursement must be coordinated to prevent duplicate payment for the same expense.

The fiscal agent, in coordination with the employer of record, will determine appropriate payment processing, accounting, and tax reporting under applicable requirements. This policy does not independently establish that payments are exempt from taxation.

VI. Discontinuation and Review

Reimbursement ends when the individual's employment ~~or contract~~ ends, qualifying business use ceases, or required service or documentation is no longer maintained.

Reimbursement will be suspended during a full calendar month of leave when no qualifying NEIWDB business use is required. Ordinary paid leave does not automatically end eligibility when the approved business need continues.

Changes or discontinuation will apply prospectively and will not eliminate reimbursement for previously authorized, eligible expenses already incurred.

NEIWDB may modify or discontinue reimbursement based on business needs, funding availability, or applicable requirements. The Board will periodically review the reimbursement amount and administration of this policy.

Reimbursement will be suspended during a full calendar month of leave when no qualifying NEIWDB business use is required. Ordinary paid leave does not automatically end eligibility when the approved business need continues.

Changes or discontinuation will apply prospectively and will not eliminate reimbursement for previously authorized, eligible expenses already incurred.

Attachment A- Annual Cell Phone and Hotspot Reimbursement Certification

Complete this form before reimbursement begins and at least annually thereafter. Attach a current billing statement supporting the requested amount. Reimbursement is subject to the Personal Cell Phone Use and Reimbursement Policy.

Staff Information:

Employee Name:		
Position:		
Review Year:		Request: ☐ Initial Authorization ☐ Annual Renewal ☐ Change

Business Need:

Service Requested:	☐ Cell Phone ☐ Hotspot ☐ Both
Describe how the service supports your NEIWDB duties, including communication, email access, travel, meetings or other responsibilities:	

Monthly Service Costs:

Cell Phone Provider:		Employee Phone # or line identifier:	
Eligible Monthly Cell Phone Service Cost:		Eligible Monthly Hotspot Service Cost, if Separately charged:	
Total Eligible Monthly Service Costs:		**Requested Monthly Reimbursement:** *Max $60 Combined*	
For a family or shared plan, explain the employee's line charges and share of common service charges. For shared hotspot service, explain the portion attributable to NEIWDB business.			

Exclude device purchases or installments, other household members' charges, home internet, accessories, insurance, repairs, late fees, and cancellation charges. Do not count hotspot service included in the phone plan as a separate expense.

Employee Certification:

By signing below, I certify that:

- The information and attached billing statement(s) accurately support my request, and I maintain and regularly use the identified service(s) for NEIWDB business.
- The expenses requested are not reimbursed through another employer, board, organization, or contract.
- I will follow the Personal Cell Phone Use and Reimbursement Policy, provide updated documentation at least annually or when requested and promptly report changes in service, costs, duties or other reimbursement that may affect my eligibility or approved amount.

Employee Signature:		Date:	

AUTHORIZATION:

☐ Approved ☐ Approved – with Adjustment ☐ Not Approved			
Authorized monthly reimbursement: *(Maximum $60 combined)*		$	
Effective Date:		Next Annual Review:	
Comments or Explanation of Adjustment:			
Approving Official Name/Title:			
Approving Official Signature:		Date:	

The Executive Director approves staff requests. The Board Chair or designated Board representative approves the Executive Director's request. Individuals may not approve their own reimbursement.

Following approval, the fiscal agent will process the authorized amount automatically each month, subject to policy provisions for proration, modification, or discontinuation. A separate monthly claim is not required.