University of Pennsylvania School of Medicine
Policy & Procedure Manual

**Remote Access Charges**                                   FINANCE- Information Services
Payment Responsibility                                      Policy Number:   Fin IS- 001
                                                            Date Written:      September 14 , 2000
                                                            Date Reviewed:
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## I.  PURPOSE

To establish a policy governing the use of departmental payments for the faculty, student, and staff subscriber fees associated with Internet Service Provider services. The University of Pennsylvania is eliminating its free dial-up modem pool beginning in August 2000.  The School of Medicine does not intend to fund the costs associated with an individual's installation or monthly subscriber fees out of departmental operating budgets. Such fees are similar to those paid for home telephone services and are the responsibility of the individual and not the School or the University.  Two exceptions to this general reimbursement policy will apply as stated below.

In addition, the cost of such services is not an allowable cost on federal grants according to OMB Circular A-21. Since it is not possible to determine what percentage of an individual's access to the Internet is directly linked to a particular grant versus personal use, payment from grants would pose a compliance risk.

When a member of the faculty or staff requires access to Penn-restricted sites, he/she will need to use their personal internet access accounts to reach the Penn network. Licensing, privacy, and usage laws require that Penn restrict access to certain services such as Library sources and Penn administrative applications to those who have valid Penn Cards or permissions to use this information.  For the School of Medicine, this means that individuals will be required to set up their own accounts with vendors who have a negotiated relationship with Penn to provide remote access to Penn-restricted information.

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**Exception I** for reimbursement. If non-federal monies that do not have any restrictions prohibiting such use are available within a department, the department chair/director may authorize reimbursement if the faculty or staff member certifies annually in writing (see *Departmental Attestation Statement* form) that partial or exclusive remote access use was dedicated to Penn mission related efforts. Such reimbursement would apply to only the monthly subscriber fees, and not the installation or other service related charges or equipment.

The faculty or staff member will be held responsible for any issues related to an audit.

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**Exception II** for reimbursement. Penn faculty and staffs who work at Penn-leased or affiliate locations that do not have direct access to PennNet will continue to have department coverage for remote access fees. The costs associated with providing Internet service to those locations for use by the Penn personnel will continue to be managed out of home departmental funds. (This has been the practice at CHOP and the VAMC).

## II.  POLICY STATEMENT

The School of Medicine will not permit the use of School of Medicine departmental funds for the payment or reimbursement of fees associated with remote access to the Internet or to any Penn network services. This applies to all faculty, students and staff whose work or educational activities take place on the University of Pennsylvania campus and who make use of an Internet Service Provider to reach Penn when off campus.

EXCEPTIONS:
In the case where non-federal monies that do not have any restrictions prohibiting such usage are available within the department, the department chair or director may authorize reimbursement of the monthly subscriber fees if the faculty or staff member certify in writing annually, that the partial or exclusive use of remote access was dedicated to Penn mission-related efforts. The amount authorized by the chair/director may be capped at his/her discretion. The form to be used is the *Departmental Attestation Statement.*

In cases in which Penn faculty and staff work in leased space or in an affiliate site location as their primary work location and for which there are no direct PennNet connections, other criteria apply. Children's Hospital of Philadelphia, the Veterans Administration Medical Center, University City Science Center, are examples of such locations that require a dial up connection to reach the Penn network. In these instances, the costs associated with bringing the service to the building can be considered an allowable School of Medicine home departmental expense.

## III.  GENERAL INTRUCTIONS

It will be the obligation of each faculty, student, and staff member to arrange for personal subscriptions to one of several Internet Service Providers.  These arrangements and the monthly fees for service will be the responsibility of the individual and not the School of Medicine home department.

The School of Medicine and home department has no obligation to keep track of personal accounts or usage unless it is providing for service as in the case of the off-campus locations listed previously.

Those faculty who request reimbursement according to the guidelines established in this policy, will complete the *Departmental Attestation Statement* that will be available through the department Business Administrator.  This attestation statement will be signed by the faculty member and the chair/director, dated, and kept on file within the department.  Reimbursement for remote access subscriber fees will be paid through the associated department annually prior to the end of the fiscal year (June).

## IV.  WHO SHOULD KNOW THIS POLICY?

- Deans / Department Chairs / Division Chiefs
- School of Medicine Faculty
- School of Medicine Staff
- MD, PhD, Combined Degree and MSCE Students

- Post- Doctoral Fellows

## V. CONTACTS

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Reviewed by Steering Committee of Standing Chairs  _____ Date_____