



Chief Information Officer
Office of Information Services
Centers for Medicare & Medicaid Services

CMS Operational Policy for Analog Line Request & Usage

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1. PURPOSE

This document establishes an operational policy for requesting the installation, movement, or removal of an analog line and the usage of analog lines at the Centers for Medicare & Medicaid Services (CMS).

2. BACKGROUND

Analog telephone lines have the potential of presenting security risks to CMS Information Technology (IT) infrastructure due to the possibility of such lines being used to gain unauthorized access to CMS IT systems, data, and information. For this reason, the number and use of analog lines must be strictly controlled.

3. SCOPE

This operational policy applies to all IT activities and IT assets owned, leased, controlled, or used by CMS, including those of CMS' agents and contractors that occupy Government space, where IT infrastructure is provided by the Office of Information Services (OIS). This policy does not apply to the CMS Regional Office or Washington, D.C., locations.

4. OPERATIONAL POLICY

4.A. Basis for Approval of Requests for an Analog Line

A request for installation of an analog line shall be approved only if justified by a legitimate business need, and only if approving the request will not pose a security risk. Examples of such business needs include:

- Stand-alone facsimile machines
- Testing of remote access dial-in through AT&T (dial-out only)
- Modems used by vendors for maintenance (see Section 4.2 below)
- Laptops not connected to the IT infrastructure (dial-out only)
- Text Telephone (TTY) / Telecommunications Device for the Deaf (TDD)
- Peripheral equipment (e.g., cordless phones)

4.B. Use of Analog Lines Connected to the IT Infrastructure

When connection to an element of the IT infrastructure is involved, the approved mechanism for dial-out analog capability is the modem pool.

Modems used with dial-in analog lines, which are connected to the IT infrastructure and used for maintenance, shall always be turned off until enabled for use by a specific request. In each

instance, the maintenance activity must be continuously monitored, and once the maintenance action has been completed, the modem must be turned off.

4.C. Recertification of Analog Lines

Once an analog line has been installed, the requestor shall be required to recertify on an annual basis that the need for the line still exists, and that the line is being used for the purpose indicated on the initial request.

5. ROLES AND RESPONSIBILITIES

The following entities have responsibilities related to the implementation of this operational policy:

5.A. Requestor

The individual requesting the installation, movement, or removal of an analog line (a.k.a., Requestor) is responsible for the following activities:

- Requesting an analog line in accordance with the appropriate procedures (see Attachment Section below);
- Annually recertifying the continued need for an analog line; and
- Accepting responsibility that the attached device is connected, if appropriate, to the CMS infrastructure only in a manner approved by the Office of Information Services (OIS) / Technology Management Group (TMG).

5.B. Requestor's Group Director

The Requestor's Group Director is responsible for authorizing an analog line request before it is submitted to the OIS/TMG for consideration.

5.C. Office of Information Services (OIS)/ Technology Management Group (TMG)

The OIS/TMG is responsible for the following activities:

- Developing and implementing procedures to ensure compliance with Sections 4.A and 4.C above (see Attachment Section below);
- Approving or disapproving requests for the installation, movement, or removal of analog lines;
- Maintaining a current list of all analog lines and associated information (e.g., requestor (user), use, annual certification date, etc.);
- Recertifying all existing analog lines on an annual basis in accordance with the appropriate procedures (see Attachment Section below);
- Disconnecting analog lines that are no longer in use; and

- Overseeing CMS' IT Infrastructure Implementation Agent or Contractor's execution of their role in fulfilling this policy.

5.D. IT Infrastructure Implementation Agent or Contractor

CMS' IT Infrastructure Implementation Agent or Contractor is responsible for the following activities:

- Developing and implementing procedures to ensure compliance with Section 4.B above; and
- Installing, moving, or removing analog lines as directed by the OIS/TMG.

6. APPLICABLE LAWS/GUIDANCE

The following laws and guidance are applicable to this operational policy:

- Recommended Security Controls for Federal Information Systems, NIST Special Publication 800-53

7. EFFECTIVE DATES

This operational policy becomes effective on the date that CMS' Chief Information Officer (CIO) signs it and remains in effect until officially superseded or cancelled by the CIO.

8. INFORMATION AND ASSISTANCE

Contact the Director of the Technology Management Group (TMG) within the Office of Information Services (OIS) for further information regarding this operational policy.

9. APPROVED

_____/s/_____

Timothy P. Love
Chief Information Officer

____8/24/04_____

Date of Issuance

10. ATTACHMENTS

The following documents augment this operational policy:

- Procedure: Analog Line Request
- Procedure: Analog Line Recertification (For Internal OIS/TMG Use Only)