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

IT Policy on the use and Management of CMS Owned Air Cards

September 30, 2009

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1. **PURPOSE**

This document establishes a recommendation for Air Card device management policy at the Centers for Medicare & Medicaid Services (CMS).

2. **BACKGROUND**

An AirCard® is a device for a laptop, PDA or cell phone that allows the user to connect to wide area wireless Internet connectivity. It connects to a mobile computing device using an available USB port, PCMCIA card slot or ExpressCard slot. (CMS will use only USB connected devices) An AirCard® enables Internet access without having to rely on hot spot availability, access to a phone line for dial-up or sharing a wired connection. A service plan (normally through a cell phone service provider) provides access to the Internet via the AirCard®. (Also Known As: mobile broadband cards or connect cards.)

3. **SCOPE**

Through a decentralized approach, CMS estimates that approximately 40 air cards, under various service plan agreements with three different service providers, have been procured through various agency funding vehicles. These air cards have been purchased by our Business Components and Regional Offices to ensure their wireless mobile (broadband) Internet connectivity for a variety of uses including enrollment events at various locations in the community and for survey and certification staff travelling from site to site. HCFAC funding specialists also use air cards to ensure connectivity in audit situations.

With our recent deployment of Wi-Fi capable laptop computers to all CMS staff, the ability to connect at no charge to public "hot spots," will make it possible to get an Internet connection without the need for an AirCard®. Although this is likely to diminish the need for these devices, until coverage (available connectivity) is commonly offered in many "more remote" locations, the need for these devices will remain indefinitely.

There is currently no CMS (Central Office) budget line item to fund the centralized procurement of these devices. Until early 2009, air card costs were submitted to OOM and were paid from the telecommunications budget. At OOM's request, OIS established a budget line to fund air cards in 2009, since this is considered a data cost as opposed to a telecommunications cost. However, that line item has been removed from the 2010 budget. Attempting to establish a contract with any single provider for these devices in an effort to achieve economy of scale may not be realistic or prudent given the market fluctuations of telephony costs and the comparatively low number of devices CMS would need to support nationwide.

It seems reasonable that the most effective solution would be to have Business Components and Regional Offices manage their own procurement process for these devices. They understand their own needs, their funding source would be their own supply budget, and this approach would provide simplicity and flexibility to the process.

4. **POLICY**

In response to this, OIS recognizes that each Regional Office and/or Business Component has different and distinct needs and challenges that are unique to their mission. These challenges may include geographic, logistical and economic issues that must be addressed separately. This condition (unlike the policy for BlackBerry allocation) presents a scenario which does not lend itself to the creation of a logical algorithm in the determination of need for these devices. In addition, telecommunications companies do not provide uniform coverage nationwide.

If the use of the AirCard® is for remote access to CMS only via the VPN client, the CMS CISO has provided the approval to move forward. And as long as the AirCard® devices procured and utilized meet the CMS approved technical (USB capable) and security standards, OIS believes that the CMC Regional Offices and Business Components are the best judge of what is needed to accomplish their mission.

EDCG and EASG jointly recommend Decentralized Purchasing and Management of CMS-purchased air cards. This approach may prove to be a more cost effective solution for the Agency than establishing centralized funding and management for these devices. It would certainly provide maximum flexibility to Business Components and Regional Offices to use air cards in a manner consistent with their unique business needs.

5. **ROLES AND RESPONSIBILITIES**

The CMS Central Office (OIS) will determine technical standards and security requirements for all AirCard® devices.

6. **APPLICABLE LAWS/GUIDANCE**

None.

7. **EFFECTIVE DATES**

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

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8. INFORMATION AND ASSISTANCE

Please contact [Erin Zalusky], [Director, Division of Customer Liaison and Support Services] at (410) 786-9309 (e-mail: erin.zalusky@cms.hhs.gov) for further information on this policy.

9. APPROVED

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Julie C. Boughn   Date of Issuance
CMS Chief Information Officer and
Director, Office of Information Services

10.   GLOSSARY

VPN - Virtual Private Network
CISO - Chief Information Security Officer
USB - Universal Serial Bus
PDA- Personal Data Assistant
HCFAC - Health Care Fraud and Abuse Control
OOM - Office of Operations Management
Wi-Fi - wireless fidelity (network)

11.   ATTACHMENTS

None