

OPTN Network Operations Oversight Committee

Meeting Summary

August 18, 2023

Webex

Daniel Yip, MD, Chair

Introduction

The Network Operations Oversight Committee (NOOC) met via Webex on 08/18/2023 to discuss the following agenda items:

1. Welcome & Committee Orientation
2. Security Project: Attestation Demonstration Walkthrough
3. OPTN Electronic Data Submission Dashboard
4. OPTN Computer System to Azure Update

The following is a summary of the committee's discussions.

1. Welcome

Dr. Dan Yip, Chair of the Network Operations Oversight Committee (NOOC), welcomed committee members to the first meeting of the year and provided an overview of the agenda. All committee members, committee advisors, representatives from HRSA, and key OPTN contractor support staff introduced themselves.

Liz Robbins Callahan, Special Counsel and Contract Operations, presented an overview of the charge of the NOOC as stated in the OPTN Contract Task 3.2.5.5.

2. Security Project: Attestation Demonstration Walkthrough

Courtney Jett, Policy Analyst, led the discussion on the ongoing work of the committee on the member security project. A timeline of the project and what the NOOC completed last year was presented to the committee, as it will have an important impact on the work the committee focuses on in the year to come. Most notably, the Board developed new member security policies in 2022, and after a year of work, the Board voted to approve the proposal during their June 2023 in person meeting. An overview of the policy and what it established for member organizations was shared with the committee.

Highlights of the proposal included:

- Required security training,
- New appointment of Information Security Contact, requirement for two site security, administrators per program,
- Member security framework and controls,
- Security readiness assessment, attestation, and audit requirements for compliance monitoring,
- Security requests for information regarding potential risks to the OPTN Computer System,
- Incident management response requirements, which could include limiting or temporarily removing access to the OPTN Computer System until the risk is mitigated.

The implementation timeline was shared with the committee. Requirements that have already been implemented as of August 1, 2023, include member's reporting of an Information Security Contract and the requirement of two site security administrators. Also, the requirement to report security incidents and respond to requests for information has also been implemented. Next steps in the implementation timeline include requiring members to complete a readiness assessment which will be done on a rolling basis. The next annual security training for all users will be implemented and the audit cycle will be implemented.

Ms. Jett shared that as of the meeting date, 94% of members were in compliance with and had reported their Information Security Contracts, and 91% were in compliance with and had reported their two Site Security Administrators. Weekly outreach is being performed to members that are not yet in compliance. Most members that are not yet in compliance have been unresponsive to prior outreach.

An in-depth, step-by-step timeline was shared with the committee on what members can expect over the next three months. Self-attestations will be the next step in the implementation process. Committee members were reminded of the attestation questionnaire that they were consulted on and will be sent to members to complete. Ms. Jett explained that feedback was received and incorporated into the questionnaire that was received from members part of the pilot program. A demonstration of the questionnaire was created, shared with HRSA, and was shared with the committee during the meeting. Other efforts underway to support the execution of self-attestations include developing a communications plan, submitting an RFP for a contractor to manage the submitted member attestations, and developing training for information security contacts. For the communications plan, the OPTN will communicate with members to inform them how members are being grouped when performing their self-attestations, what groups each member will be in, and what they can anticipate for their own self-attestation timeline. Training for information security contacts will include education on how to use the tool, what the OPTN is looking for when members complete their self-attestations, and why the attestation is important to the entirety of the security project. An education and training tool kit will also be implemented, tentatively, by September 2023.

A demonstration of the member security project attestation was shared with the committee. Ms. Jett shared a brief background and overview with the committee on what members can expect while completing their attestations, based on what the NOOC implemented in the security policy. For the 2023 and 2024 attestation cycle, members will be broken up into three groups scheduled throughout the year, which was largely a resource-based decision. The three groups will be randomized: affiliated members will be kept together, and roughly the same number of each member type will be included within each group. Based on a recommendation by the committee Chair, members that participated in the pilot group testing may be included in the first attestation group.

Each group will have approximately 90 days to complete and return their attestation. Communication regarding timeline and member groupings will also be sent to OPTN representatives and alternates as well as administrators, including a 30-day notice prior to each group beginning their assessment period. For the first year, only critical and high-risk controls will be scored, and low-risk controls will be included as an optional gap assessment. Starting in the 2024 and 2025 assessments, members will be scored on all controls and will be measured on all controls indefinitely. The risk management tool, LogicGate, has been configured for the member attestation process. The objective in demonstrating the tool to the NOOC was for the committee to gain understanding of the tool.

Manny Carwile, IT Risk and Compliance Manager led the committee through the demonstration of the LogicGate tool. The committee was shown both the view that an access manager would see when reviewing a member's attestation, and the view that members will see when completing their

attestation. Prior to the meeting, the committee was given materials to review on the workflows for the data calls, the attestation, and a list of all the security questions including their level of critically, potential response options, and their scores. Members will attest to 110 security questions, based on the National Institute of Standards and Technology (NIST) 171 framework.

The committee was presented with a certification statement that will be included in the attestation for members to certify that the information they have submitted is accurate.

Summary of Discussion:

A committee member asked if the NOOC will be managing incidents that are reported to the OPTN and what authority the NOOC has. Ms. Jett explained that in the event of a security incident, the NOOC has the authority to disconnect a member from the OPTN Computer System. Disconnecting a member and not inactivating them will allow members to continue performing transplants. HRSA also has the authority to require a member be disconnected from the OPTN Computer System. The NOOC is required to report which members have experienced incidents to the Board annually. A committee member asked if noncompliance with policy standards means to disconnect a member from the system. It was explained that the policy does not include minimum compliance requirements because there is no data to support what the minimum threshold should be.

The committee discussed the confusion amongst OPTN members on the difference between site security administrators and information security contacts. The committee discussed including a clarification on the differences between the two roles in the education and training tool kit. A committee member also asked how these new roles differ from the site administrators that member organizations have already needed for access to the OPTN Computer System. Michael Ghaffari, Senior Director of Technology Development, explained differences between the role of a site administrator and the roles of site security administrators. Mr. Ghaffari explained that site security administrators are the people that control access to the OPTN Computer System, but with the new roles, the policy intends to have members identify a security contact which will be more aware of what is happening at an organizational level for that OPTN member. Mr. Ghaffari also explained that the training between the two roles is different. The training that the information security contact receives will be different because it may be more in-depth on how these delegates may need to inform the OPTN of an event. A committee advisor noted that usually, the site security administrator is someone that works in transplant and is part of their team, while the information security contact is more focused on IT within the member organization.

After the LogicGate tool demonstration, a committee advisor asked if the attestations would always be self-attestations performed by the members, or whether there will be third-party auditors attesting to members systems. Ms. Jett explained that attestations will always be self-completed by members, but that third-party auditors would perform routine audits of member's systems. During their discussion, the committee also discussed the potential need to include comment boxes for members to provide more information on how certain controls are in place within their institution's system. They discussed potentially including comment boxes on controls that are considered critical for members to add more context to their responses. A committee advisor stated their concern on the length of the attestation and asked whether members will be able to refer to attestations submitted in years prior. The committee discussed potentially including how long members may expect the attestation to take.

A representative from HRSA asked that contact information be added to the attestation form so members know who to contact at the contractor if they have any questions. Ms. Carwile agreed that this

could be added to the attestation form and could be included in email notifications about attestation materials.

3. OPTN Electronic Data Submission Dashboard

Marty Crenlon, Healthcare Integration Program Manager presented on the OPTN electronic data submission dashboard. Mr. Crenlon explained that the dashboard is an OPTN Contract requirement for the contractor to report metrics on utilization of tools to submit data electronically. Based on prior conversations with the NOOC and HRSA, it was decided that it would be most appropriate for this information to be available on two distinct dashboards. One dashboard would be available to the public on the OPTN website as a transparency measure, and the other dashboard would include a more detailed version of the information that would be accessible to members as well as oversight bodies, such as NOOC and HRSA, that would be available on the Data Services Portal. Mr. Crenlon then presented which requirements would be available on each of the two dashboards.

The data sources that are included in the dashboards were presented to the committee. Mr. Crenlon explained that the data that feeds into the sources will be refreshed monthly, around the 7th of each month and will show data over the past 12 months. All the data is derived from the audit records within the OPTN Computer System, and the two dashboards will be pulling data from the same data sets, however the granularity of the data will differ depending on the dashboard. Transplant Candidate Registration (TCR), Transplant Recipient Registration (TRR), Transplant Recipient Follow-Up (TRF), Deceased Donor Registration (DDR), Living Donor Registration (LDR), and Living Donor Follow-up (LDF) forms will all be included within the dashboards.

The committee received a demonstration to illustrate the view of the dashboard on both the public facing dashboard and the member facing dashboard. Mr. Crenlon explained in-depth what each metric represents, what forms are incorporated into the dashboard and where, and what the general public may expect when accessing this dashboard from the OPTN website.

Summary of Discussion:

The committee discussed multiple metrics included in the dashboard and more discussion was had around what each percentage represents. A committee member asked why the external dashboard would be beneficial for public consumption and what the public may learn from this information. The committee discussed which forms are included in pre-allocation versus post-allocation metrics and discussed whether they thought the placement of these forms were appropriate.

The meeting was adjourned.

Upcoming Meetings

- September 25, 2023
- October 12, 2023
- October 27, 2023
- November 6, 2023
- November 20, 2023

Attendance

- **Committee Members and Advisors**
 - Andrew Kao
 - Bruno Mastroianni
 - Daniel Yip
 - Edward Hollinger
 - James Pittman
 - Kelley Hitchman
 - Laura Butler
 - Paul Connelly
- **HRSA Representatives**
 - Andriana Martinez
 - Christopher McLaughlin
 - Cliff Myers
 - Manjot Singh
 - Nick Lewis
 - Vanessa Arriola
 - Vinay Vuyyuru
- **UNOS Staff**
 - Amy Putnam
 - Anna Messmer
 - Bonnie Felice
 - Courtney Jett
 - James Jobes
 - Jerry DeSanto
 - Krissy Laurie
 - Kristine Althaus
 - Liz Robbins Callahan
 - Manny Carwile
 - Marty Crenlon
 - Michael Ghaffari
 - Morgan Jupe
 - Read Urban
 - Rob McTier
 - Rebecca Murdock
 - Steve Mohring
 - Susie Sprinson