

**OPTN Network Operations Oversight Committee
Meeting Summary
April 13, 2023
Chicago, IL & Webex**

Edward Hollinger, MD, PhD, Chair

Introduction

The Network Operations Oversight Committee (NOOC) met in-person in Chicago, IL and through Webex on 04/13/2023 to discuss the following agenda items:

1. Welcome
2. API Dashboards and Goals to Increase Adoption
3. OPTN Procurement and NOOC Engagement
4. Projects and Resource Allocation
5. OPTN Member Information Security Policy and Bylaw Enhancements:
 - a. Required Security Training
 - b. Policy Language Review*
 - c. Non-Member Access to OPTN Systems
 - d. Incident Planning: Business Continuity
 - e. Cybersecurity Incident Planning: Operational Guidelines
 - f. Compliance Monitoring and Reviews
 - g. Pilot Attestation Feedback to Date
 - h. Scoping - NIST Controls
6. Closed Session

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

1. Welcome

Dr. Ed Hollinger, Chair of the Network Operations Oversight Committee (NOOC), welcomed committee members and provided an overview of the meeting agenda.

2. API Dashboards and Goals to Increase Adoption

Mr. Marty Crenlon, Healthcare Integration Program Manager, explained that the goals of the presentation are to review potential API dashboard metrics and define NOOC's goals to address API adoption. Mr. Crenlon explained that API dashboards will use monthly data and be visible over a 6-12 month timespan. The dashboards will focus on percentages rather than raw volumes.

The dashboards will provide two separate views, one that geared towards the general public on the OPTN website, which will be focused on digestible information. The other view will contain information that is of more interest to the NOOC and members that could display center specific information.

Mr. Crenlon explained that there are two areas to focus on today: member visibility and hosting location. Mr. Crenlon shared an example of the six-month public view of death notification registrations (DNRs) submitted electronically. He then shared a more detailed example that could be provided to members.

Mr. Crenlon then presented information on the metrics that would be shared on public facing dashboards versus internal OPTN dashboards. Mr. Crenlon presented what public metrics currently exist within the system. The topline summary metrics were shared along with an estimate of categorization on where they currently sit.

The committee discussed what metrics are useful for patients and the public to be able to view on these public dashboards. Mr. Crenlon also presented the system metrics with additional granularity that can be provided. Mr. Crenlon then presented additional metrics that would be specific to the OPTN view.

Mr. Crenlon shared that there is a new PWS requirement for the contractor to support the NOOC in its efforts to define goals and tactics to drive wider API adoption and establish requirements for member compliance agreements for API usage and integration. Mr. Crenlon asked if there were any other areas the NOOC would like to pursue in collaboration with the OPTN Contractor. Task 3.4.2, Deliverable A120 was presented to the NOOC to show what existing commitments the OPTN Contractor already has in place. These commitments include new API development and releases, which includes the lung CAS calculator, the deceased donor API, donor HLA submission, and organ check-in. The OPTN Contractor has also agreed to three new member engagement campaigns through Deliverable A120, which include the donor record API, the unacceptable antigen API, and the OPTN Data System API. Mr. Crenlon asked the NOOC whether there were any goals or tactics beyond these activities that the NOOC wishes to pursue to drive wider API adoption.

Summary of discussion:

A committee advisor noted that it is useful for all OPOs to have access to this data. Another committee advisor noted that IT resources vary due to transplant center size, which can impact ability to adopt APIs. Viewing adoption rates for peers may also negatively impact motivation for API adoption. They noted that until there is a requirement for adoption, adoption will be challenging. A representative from HRSA noted that this is a contract requirement to enhance transparency and encouraged the NOOC to think about their stance on API adoption on behalf of the Board. A committee member commented that members with fewer APIs are less risky to the system from an information security standpoint.

A committee advisor suggested that the API provide filter capabilities so centers can compare themselves to peers. They asked about the public dashboard and inquired about the benefits and impacts to the general public. Two committee members noted that API metrics are process metrics, but the community and public are most interested in outcome metrics. They continued that these granular metrics are most useful internally. A committee member asked about onboarding APIs, and explained that some software they use are incompatible with APIs. Many OPTN members want to use APIs, but software vendors have challenges with the interface. They suggested additional collaboration in API development. Another committee member noted that if the OPTN wants adoption to change, adoption will need to be mandated and include support. A representative from HRSA asked if there is a role the OPTN Contractor could play to help facilitate API adoption and easy access with software vendors. A committee advisor commented that they have had success working with the OPTN Contractor, but unfortunately because it is not a requirement for APIs to be used, it is not a top priority for their organization to implement them. A committee member commented that if API adoption did become a requirement in the future, the OPTN Contractor would need more technical support to make that happen because there would be so many members that would need assistance from the OPTN and software vendors.

A committee advisor recommended the NOOC focus on internal facing dashboards first and then focus on external facing dashboards. The advisor noted that in the future, the NOOC could make a recommendation to the Board for API adoption to become a membership requirement. They

commented that it is up to members to implement these APIs that the OPTN Contractor has made available to them, but right now the contractor has no way to enforce API usage. They suggested the OPTN Contractor collaborate with the software vendors to complete the adoption, or API adoption be included in OPTN Bylaws.

The committee chair summarized the discussion and concluded that the NOOC would like to focus on internal facing dashboards first.

A committee member noted that some of the values may be confusing to the public or will need additional context to avoid drawing incorrect conclusions. A committee member asked which dashboards are useful for patient and donor families, and asked if the OPTN has asked this population what they would like to see included in the dashboards. A patient and donor family representative commented that the community would rather see that the system is running and the percentage of centers that are utilizing APIs, and whether a patient is listed and their status. Another committee member thought there was an opportunity for more transparency to present information to patients on their listing status, but this is a separate effort. A committee member explained that patients want information that they can utilize and could impact their care. A committee member commented that clarity is critical when demonstrating public metrics, noting that the data and percentages that are presented can be confusing and unclear to some people.

A committee member asked that the data to be broken up by member type in the future. Another committee member agreed and suggested the OPTN develop a process map to show what current APIs are and what future APIs can be developed. A process map can help solidify these processes in the future. A representative from HRSA asked if these process maps exist, to which Mr. Tulchinsky explained that the OPTN Contractor does not have insight into the process maps of members, such as hospitals and OPOs, because that is property of the respective institutions. A committee member commented that there is a difference in process maps across members, simply from the different software vendors they use and how data is reported differently.

When discussing the new contract requirements and the API activities that the contractor plans to implement within the fiscal year, a committee member asked if the contractor has the ability to collect information on what vendors their members use or do not use and why. Mr. Crenlon responded that the OPTN has some of this information informally. A committee member stated that in the future, the NOOC could propose API requirements be added to the OPTN Bylaws.

Next Steps:

Amy Putnam, Director of IT Customer Advocacy, summarized the discussion points and takeaways from the committee, noting that the contractor should concentrate on OPTN metrics and internal metrics. Once they complete additional work on internal metrics, then they could determine the best public facing metrics. A representative from HRSA concurred that if the NOOC is comfortable starting with these metrics and working to update and refine this information the committee could then develop additional metrics.

The committee chair concluded the discussion by summarizing the committee's discussion that they would like to see more granularity on internal dashboards. They also noted the importance to try and match internal metrics with the external metrics the NOOC provides and plans to provide in the future.

3. OPTN Procurement and NOOC Engagement

Dr. Hollinger led a discussion about HRSA's OPTN modernization initiative announcement. Dr. Hollinger asked how the NOOC can collaborate in the process and how HRSA plans to utilize the expertise that exists on the committee. He noted that the NOOC would be a beneficial resource to HRSA in

understanding the organization from an individual member level, understanding what processes exist, how to leverage data to better understand those processes, and what metrics does the Committee think are important to collect. A NOOC advisor also asked what role the committee will play in the modernization effort and how the committee can best align with the initiative.

Summary of discussion:

The committee asked what role they could anticipate playing in the modernization effort and how they could align their efforts. A representative from HRSA responded that HRSA plans to engage the NOOC as a stakeholder, as it plans to collaborate and engage with other stakeholders. A committee member commented that there are multiple areas of reform in which the Committee's expertise could be utilized, including technology, data, transparency, and analytics. They encouraged the committee members to identify and engage with other groups they find to be important stakeholders to have them involved in the process as well.

A committee advisor suggested process mapping and how this might help the committee understand appropriate stakeholders and how to best support them from a technological perspective; to ensure that the OPTN is analyzing the correct measures of data, metrics, and technology to support transplantation. A committee advisor asked what HRSA planned to be within the NOOC's purview because tasks within the modernization act are not currently under the contractor's purview.

A committee member explained that they foresee there being multiple contracts. They asked how the contractors would work together. HRSA responded that this process is one of exploration to figure out what works well for the system. If there are multiple contractors, then coordination between the entities is critical. HRSA plans to have a formal process of collecting questions and comments from stakeholders on what they believe is important to consider during their modernization initiative.

A committee member asked which initiatives will belong to which contracts moving forward and what the phasing of the projects will look like in terms of technical acquisitions. The member asked how the changes would be phased out on a greater scale and what the timeline for this will look like. HRSA responded that this information is to be determined. HRSA is hoping that once the contract bids go out, then they will be able to identify which initiatives will be paired with which contract. The timeline is in development and HRSA is still in the discovery stage with the hopes that stakeholder engagement will help mold the timeline and the process itself. Continuity of services is HRSA's number one priority. A committee member asked that as they move forward, what does HRSA envision the continuity of services in the community to look like. HRSA stated that the NOOC is a key stakeholder and given the knowledge and expertise that the committee has on the OPTN Computer System, HRSA plans to seek consultation, advice, and input from the NOOC throughout the modernization initiative.

A committee advisor stated that they like the idea of a singular committee that has oversight of operations of the entire organ allocation system for the OPTN. A committee member asked how the public can provide feedback to HRSA on the modernization initiative. They asked if there is a forum for the public to submit their feedback but to also ask questions about the system. HRSA responded that federal information gathering has to follow specified processes and follow certain requirements and there is no forum for this at this time.

4. Projects and Resource Allocation

Michael Ferguson, IT Portfolio Manager, along with Michael Ghaffari, Director of IT Software Engineering, presented the OPTN's current projects, future projects, and the resource allocation. Mr. Ferguson explained that the OPTN has seen an increase in policy bandwidth. Currently, 15,000 resource hours are budgeted per Board policy cycle in order to build OPTN policies into the OPTN Computer

System. After receiving feedback from the Policy Oversight Committee (POC), IT targeted an increase in implementation hours to 30,000 hours per board cycle to complete the focus areas of the POC. These two main focus areas were continuous distribution and multi-organ transplantation efforts. In order to double the amount of implementation hours, this led to the creation of four additional software engineering teams.

Mr. Ghaffari presented a high-level overview of the approach the OPTN has taken since the approval of the increase in implementation hours. The four additional software engineering teams will be staggered in implementation, with the first team starting in January of 2023 and the last one beginning work in January 2024.

Mr. Ferguson presented a timeline to the NOOC to illustrate project and resource allocation timeframes and how these projects are expected to be divided up by team. The different engineering teams, their current projects, and potential bandwidth for future projects were all displayed in the timeline. The NOOC was also reminded of the integration pathway to show how project and resource allocation fits into the integration pathway to show the first two steps of the seven-step process. These steps were to develop new API functionality and deploy API functionality into the OPTN Computer System (beta). The goal for steps three to seven is to adopt new functionality and process as fast as possible.

The first step in the OMB approval process is between the OMB and HRSA, while the OPTN Contractor serves as a partner and supplies necessary data and information for development requests and for public comment, so the data collection is defined appropriately. A graphic of an ideal OMB submission timeline was presented to the committee. The contractor is currently working to define the projects on the integrator line and to develop draft specifications. Outreach on this work has begun and work has started internally. Internally, teams have begun analyzing data collection and integrators are being informed of the processes.

Summary of discussion:

A committee member asked how staff felt about their current bandwidth as it relates to the increase in resources. Mr. Ghaffari explained that staff felt well positioned to work on new approved policies when it comes to continuous distribution and multi-organ policies. Staff are also working to ensure that they are preparing the system for framework changes that lie ahead.

A representative from HRSA thanked the team for compiling this information because it is critical for the NOOC to understand the workload the OPTN is undertaking including an increase in resources and budget.

A committee member asked if current continuous distribution efforts will allow the OPTN to make policy changes smoother and less labor-intensive in the future. Mr. Ghaffari explained that the continuous distribution framework they are operating under is calculation based and from a technology perspective, this will allow them to scale and provide better solutions with these calculations. The framework also fits well into how the matching allocation system is built.

5. OPTN Member Information Security Policy and Bylaw Enhancements

Required Security Training:

Ms. Courtney Jett, Policy Analyst, started the conversation on the bylaw enhancement project and the required security training. The committee discussed feedback received around the project and how to incorporate it into the project. The feedback received was directly related to the required security training, and members expressed their concern that the training was duplicative of already existing requirements. The OPTN Contract currently states that the contractor shall coordinate with the NOOC

on the “development of annual training requirements for both OPTN member site administrators and OPTN member users.” In the past, the committee has discussed requirements to allow for attestations to training, so long as the NOOC develops what those requirements would be. This would allow for more flexibility for members so they do not have to do any additional security training.

The contract also requires that all security frameworks must require OPTN member users to “complete and pass” a contractor administered exam. As the policy currently stands, the exam was included in the training, but it could be made separate so members only have to complete the exam and not the security modules.

The committee recapped what has already been established on training components and what the exam would cover, with the exam being modeled after the categories under the Federal Information Security Management Act (FISMA). These categories in the training are cybersecurity, securing information, social engineering, and breaches and reporting.

The committee also discussed scope and who would be required to complete the security training. For example, would it need to be anyone that works at an OPTN member organization, anyone who works with a transplant patient, anyone who is paid under a transplant cost center, etc. It was noted that the scoping of who would be required to complete this training for the OPTN would be challenging to enforce.

The committee discussed whether members should be allowed to take their own institution’s security training to suffice for their training for the OPTN. Ms. Rebecca Murdock, Senior Policy Counsel, explained that the Contract language, states that the OPTN must “ensure all complete and pass a COR approved and contractor administered exam”. The language was considered by the committee to determine whether or not there needs to be a completely separate security training for OPTN members. Ms. Jett informed the committee that there is additional language in the contract about the development of annual training requirements that the committee could examine. She explained that discussions with other HRSA representatives had taken place on member’s abilities to attest to these requirements for existing member institutions as part of the security framework. The contract says that the contractor shall coordinate with the NOOC to establish security frameworks for OPTN members based on the type of organization, including the development of annual training requirements for both OPTN member site administrators and OPTN member users.

Ms. Murdock explained that the OPTN Contract requires there to be an annual training requirement, but it does not require that the training be an OPTN training. The exam would need to be COR approved and the contractor would have to administer the exam. This would allow members to utilize other trainings, as long as these trainings meet the requirements that the OPTN establishes.

Summary of Discussion

A committee member asked what the timeframe was for members to complete the training and whether it needed to be completed once or on a determined frequency basis. Ms. Jett stated that the contract does not specify how often training needs to be completed. The committee member thought that unless there was new information to provide, it does not make sense to add a requirement to members of an annual exam. This work would be redundant for many members because many can attest to having similar trainings at their respective institutions.

When discussing what members thought about security training, there were multiple committee members that shared the negative feedback they received at regional meetings about members having to complete duplicative security training. Members expressed that if they are already completing security training for their institution, then this should be sufficient for the OPTN. A representative from

HRSA stated that because an annual exam is explicitly stated in the OPTN Contract, that they could not support something other than what the contract states. HRSA asked the committee what parameters they thought were necessary to protect the security of the system, regardless of what pushback they have received. A committee member suggested there be two options a member could choose when it comes to security training. Members could choose that if their institution has a security training in place then they could take this training and attest that they have completed the training and take the exam. A second option could be that if a member's institution does not offer a sufficient security training, then they would complete the OPTN's security training. The committee member suggested that a member's security training be reviewed in the OPTN's audit. They asked the committee what benefit there would be for members to complete two security trainings. A representative from HRSA responded that the benefit of having members participate in an OPTN specific security training is to help members understand that, as a user, they have some responsibility of the OPTN Computer System.

The committee discussed the content of the training and discussed the possibility of training being different than their institution's training and being tailored more towards the OPTN. A committee member commented that if the goal of the training is to be OPTN specific, then the OPTN needs to ensure the training is just that and does not include any general security training members are already completing. The OPTN needs to highlight how their security training would be different than member's institutional training. Terri Helfrich, Director of Information Security, suggested administering an exam for members that requires them to exemplify that they have completed the OPTN security training. Committee members concurred that this would be beneficial, especially because they thought this could be an instant learning opportunity for members.

While discussing the contract language that requires members to complete security training, a representative from HRSA reminded the committee that if they feel the contract language is insufficient, that they are the stakeholders and experts that should recommend these changes to HRSA. The contract language aims to ensure that the system is secure and working well for members. The language is not supposed to cause any undue burden on members.

A representative from HRSA asked that if members were to use their institution's security training, what would be the likelihood of members being able to include OPTN specific content in their institution's training. A committee member responded that they did not think their institution would be comfortable including OPTN specific content in their institution wide training. OPTN specific content would be irrelevant to many people at these institutions. The committee member suggested OPTN specific information be included in the OPTN security training exam members would undergo. This way, members would be able to utilize their institutions security training while also receiving the appropriate OPTN security training.

Policy Language Review*:

Ms. Jett reviewed the policy language and post-public comment changes that were made to the originally proposed language. The post-public comment changes were to amend the definition of "Security Incident", update most references of the OPTN Contractor to OPTN, modify language on loss of access, update training requirement language to "met OPTN training requirements" (as opposed to "completed OPTN required training") to better encompass that outside training could qualify, and to state that there is no requirement for business continuity plan within incident response plan. Other minor clarifying language changes were also made after public comment.

The committee discussed policy language as it relates to loss of access and discuss whether 48 hours was a sufficient timeline for retrospective NOOC notification of actions, and whether the NOOC, on behalf of the OPTN, will be able to take action and suspend a member institution's access to the OPTN

Computer System. When discussing whether 48 hours was an appropriate amount of time, a committee member provided information that four days is a metric used by the Security and Exchange Commission (SEC), while another committee member suggested using the timeframe of 72 hours. The committee felt strongly that how long someone has to notify the OPTN will depend on how a member defines an incident. Ultimately, the committee decided that 48 hours was an appropriate window for notification.

The committee discussed different threat levels an attack on a members system could be and how this could contribute to a members' time it takes to report an incident to the OPTN. Threat levels and how they contributed to a member's reporting time were also a topic of discussion. A representative from HRSA explained that they believe the NOOC should be the first party notified and the committee could then take the situation to the MPSC if necessary. The committee also discussed the policy language used to define a security incident.

When discussing access to the OPTN Computer System, the changes after public comment allowed for more flexibility in operationalizing questions of access. Within policy language, the group discussed the three member types, scoping, and establishing minimum requirements. The committee examined the policy language of definitions, how a security incident is defined, and the scoping of reporting to the OPTN. The committee discussed scoping and whether the language around the topic was too broad. The committee decided to rewrite some of the language upon review.

The committee continued to wordsmith and review changes to policy that they thought were most appropriate and discussed how these changes related to IT. Minimum security control values were discussed and how they are defined within OPTN policy. The committee also considered whether the minimum security control value definitions aligned with the NIST control standards that they intended to utilize. When drafting language, the committee considered security frameworks that members could have in place and the attestation requirements with each.

The committee discussed the roles of site security administrators and how their roles have changed in policy, including the requirement for members to have two site security administrators, as opposed to just one.

While discussing security incident management and reporting, the committee discussed the timeframe members had to report a security incident to the OPTN contractor. The language stated that the member would have 24 hours, whereas committee members thought this was too tight of a timeframe to follow and suggested 72 hours as a more appropriate industry standard to follow. The committee discussed including "as soon as possible" in the policy language and having the 72 hours was the latest possible time members could report an incident. The committee considered including 24 hours as the timeframe of initial warning from the member to the OPTN contractor of a security incident having occurred.

Non-Member Access to OPTN Systems:

Ms. Tynisha Smith, Contracts Compliance and Privacy Manager, presented the high-level concerns when it comes to non-member and third-party access to the OPTN Computer System and OPTN Data. The objective of the presentation was for the committee to consider ways to ensure that access to the OPTN Computer System and information assets by third parties is appropriately controlled so that confidentiality, integrity, availability, and accountability of the system and information remains intact. The presentation allowed the NOOC to explore how to reduce risk of any loss, compromise, or misuse of the OPTN Computer System or information assets by these users. Ms. Smith noted that there is a lack of governance and clear policy language for these non-members. The existing policy language was shared with the committee and was noted that the language can be found in 3.1.A Non-member Access. The

existing policy language was modified approximately 10 years ago to create policy 3.2.1.3, to include details on permissible access to the OPTN Computer System.

The committee was asked for guidance on policy language that clearly defines authority, right in data, and addresses security in data protection for third-party users. It is important that the committee and the transplant community understand the different reasons why third-party users are permitted to access the OPTN Computer System. High-level concerns were shared with the committee to understand what issues could arise with third-party members accessing the system. Ms. Smith plans for the committee to have additional conversations about potential use cases and concerns.

The existing policy language challenges the scope of the OPTN's authority because it permits OPTN members to grant access to the OPTN Computer System and Data for purposes other than transplantation, when the OPTN Computer System and Data were originally created to facilitate transplant. If third-party members are permitted into the environment, then it is important for the committee to understand what purposes, beyond transplantation, warrants access. The NOOC was asked to consider if this was within the purview of the OPTN and how this relates to OPTN obligations. Non-member and third-party access shows that there is no direct relationship for accountability between these members and the OPTN contractor or HRSA; this is due to the fact that these users have contracts and relationships directly with the OPTN member and not the OPTN contractor itself. Without having visibility or understanding of what these non-members were hired to do, it is difficult to implement oversight because there is not a clear line into what they were hired to do and whether it supports transplantation. The committee was asked to consider what third parties should have access to the OPTN Computer System and who should make that decision. Currently, non-members are permitted into the OPTN Computer System to access the OPTN Computer System and OPTN data. As it is presently written, the policy is unclear about rights and responsibilities.

The OPTN Computer System was originally engineered to meet the needs of OPTN members and their OPTN obligations, therefore there are situations where the least privilege standard is challenged. The OPTN also has concerns over the potential for conflicts of interest, the fact that some of the third-party users of the system are competitors, along with other possible privacy risks. Other questions that need to be answered when it comes to non-member and third-party use are who monitors and audits these group's compliance to policy, and what their requirements and responsibilities are. The committee needs to consider who the non-members are and how we apply the same parameters for non-members as we do for members.

Summary of Discussion

A committee member asked for some examples of non-member or third-party users of the system. Third-party organ offer screening services was one example given to the group, and Ms. Smith explained that they are third-party users that support organizations and members by serving as staff, but in these cases it is easy to see the users connection to transplantation. The challenge with current policy language, is that it creates an opening for organizations to gain access to the OPTN Computer System and OPTN Data. Therefore, the OPTN needs to refine the policy language and consider why the OPTN would grant access to the OPTN Computer System and OPTN Data if their work does not support transplantation. Another committee member commented that their organization has granted access to users for research purposes. They explained that there are companies out there that do ultimately want to aid in transplantation and perform research that warrants access to OPTN data. Ms. Smith explained that there are other pathways for researchers to gain access to the OPTN data system other than becoming a third-party or non-member user, so there should not be concern about those individuals losing their access. Ms. Smith highlighted that what these users are doing is connected to transplant, so they are not a group of users that the OPTN has difficulty understanding their purpose.

A representative from HRSA asked if OPTN members pay third-party organizations for access, or whether third-party organizations pay the member that they access the system through. They asked if there are contractual agreements between the groups. A committee advisor stated the importance of determining what these third parties use case is and why they need access to the system. A committee member asked how many third-party users there are that access the OPTN Computer System. They asked if there is a way to create another member type for these users and other members of the committee supported this idea. A committee member asked if there is a way to group the third-party users to better understand why they are accessing the OPTN Computer System and OPTN data.

A committee member asked how access is defined in this case and whether there is auditing policy for these third-party users on the frequency at which the OPTN would audit them. Ms. Helfrich explained that historically, the OPTN would audit members once a year for access reviews, but recently the occurrence has changed, so the OPTN audits their systems three times a year. Members must complete a self-attestation that the individuals they are granting access to, have contracts that require security controls that meet OPTN requirements. She noted that access review does include third-party users. A committee member asked if this could be solved by members reporting to these third-party users instead of granting them full access to the system.

Next Steps:

Ms. Smith asked the members of the committee to have more conversation to better understand who the non-member users are and what they are being contracted to do, so the OPTN has more insight into what types of services these members are providing.

Compliance Monitoring and Review:

Ms. Jett presented on compliance monitoring and review as it pertained to the member security project. The process for the attestation would begin with the OPTN providing attestation forms to information security points of contact at member institutions. Members can either fill out the full attestation, or they can show compliance with an alternate but equivalent framework based on an audit report within the past 365 days that it is signed by a third party. Ms. Jett asked the committee what they thought were appropriate framework equivalents.

Summary of Discussion

When discussing the attestation, a committee member thought that this conversation was premature based on earlier conversations around the word “compliance” not being the appropriate term to use. It would be difficult for the OPTN to discuss alternative means of compliance when they have not determined what compliance means yet. The committee member asked if the OPTN planned to score member’s attestations. The committee discussed removing the option of showing compliance with an alternative and equivalent framework. For the time being, they suggested having members fill out the attestation and the NOOC can develop the framework equivalencies later.

A committee advisor stated that the purpose of an attestation is not to give someone a passing grade, but to let members know how their environment is operating, how they can improve their system, and whether their system is operating to standard. determine is working well. IT leaders in the advisor’s organization were worried about administering passing grades. Instead, they suggested that when attestations are completed and when members are told what could be improved, then members should focus on improving these specific controls. Another committee advisor agreed and thought that it was important for members to understand where their gaps may be and for them to show how they intend to address the gaps, based on their priorities. The process of members growing their system and addressing their gaps are most important.

6. Closed Session

The committee held a closed session with committee members, advisors and HRSA representatives.

Attendance

- **Committee Members and Advisors**
 - Adam Frank
 - Bruno Mastroianni
 - Clifford Miles
 - Edward Hollinger
 - James Pittman
 - Jeff Sterrette
 - Kimberly Rallis
 - Melissa McQueen
 - Paul Connelly
- **HRSA Representatives**
 - Adriana Martinez
 - Adriane Burton
 - Arjun Naik
 - Christopher McLaughlin
 - Cle Diggins
 - Manjot Singh
 - Nick Lewis
 - Vinay Vuyyuru
- **UNOS Staff**
 - Alex Tulchinsky
 - Amy Putnam
 - Bonnie Felice
 - Courtney Jett
 - Jason Livingston
 - Krissy Laurie
 - Kristine Althaus
 - Liz Robbins Callahan
 - Marty Crenlon
 - Michael Ferguson
 - Michael Ghaffari
 - Morgan Jupe
 - Rebecca Murdock
 - Rob McTier
 - Susie Sprinson
 - Terri Helfrich
 - Tiwan Nicholson
 - Tynisha Smith
- **Other**
 - Katherine Mlika