OPTN Network Operations Oversight Committee
Meeting Summary
February 23, 2024
Webex

Daniel Yip, MD, Chair

Introduction

The Network Operations Oversight Committee (NOOC) met via Webex on 2/23/2024 to discuss the following agenda items:

1. Welcome
2. Migration of the OPTN Computer System to the Public Cloud
3. OPTN Member Security – First Wave Attestations
4. Revise Conditions for Access to the OPTN Computer System
5. HRSA Audit Update
6. Closed Session

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

1. Welcome

Dan Yip, Chair of the Network Operations Oversight Committee (NOOC), welcomed committee members and advisors and provided an overview of the agenda.

2. OPTN Member Security – First Wave Attestations

Terry Doolittle, Member Security Program Manager, provided the committee with an update on the first wave of member security attestations. Mr. Doolittle shared that the objectives of the conversation were to inform the NOOC of the status of the first wave of attestations, to share feedback received thus far, and for the committee to determine the potential scope of ramifications for late attestations.

Mr. Doolittle reminded the committee that members will be required to perform yearly security attestations per OPTN Policy 3.1.A, and this year's attestation had 58 required questions based on critical/high risk controls as defined by NIST standards. Mr. Doolittle shared that the first wave of attestations consisted of 139 members that were randomly selected: 79 transplant hospitals, 19 organ procurement organizations (OPOs), and 41 histocompatibility lab members. Mr. Doolittle shared that information about the first round of attestations, when the attestations were submitted, the completion status of attestations by member type, and feedback from the community has been shared with the OPTN community. He noted that feedback from members in the first round of attestations included concerns from a small number of members needing to provide security information and questions on what level of detail the OPTN should require related to control status.

Mr. Doolittle shared that OPTN staff will continue to follow up with members who have missed the attestation deadline. Staff will compile both individual responses and common themes for the NOOC to review. He explained that NOOC members will receive responses from the member programs who have missed the attestation deadline. Two NOOC reviewers will be assigned to review each response and recommend any actions that the OPTN may need to take to the full committee to discuss in a closed session.

Mr. Doolittle posed questions for the committee, including what the committee believes is the range of appropriate actions the NOOC should consider when reviewing member cases.

Summary of Discussion:

A committee advisor shared their experience with completing their organization's attestation. Another committee advisor asked if members with a status of "complete" are still submitting revisions. Mr. Doolittle shared that some members are still submitting revisions. He shared that during this first round of attestations, the OPTN is working with members to ensure they understand their attestations and are learning from the process.

A committee advisor commented that the attestations are an appropriate level of security practice for the OPTN. A committee advisor suggested that the OPTN consider ways to modify the attestations to include more standard responses instead of open-ended questions. Mr. Doolittle noted that the OPTN is considering more ways to streamline the process for members. A representative from HRSA asked if changes to the attestation and assessment would require a change in policy. Contractor staff noted that the structure of the attestation and assessment were not explicit in policy, therefore it would not require a policy change.

Next steps:

The committee will receive an update on member attestations during their next meeting.

3. Revise Conditions for Access to the OPTN Computer System

Courtney Jett, Policy Analyst, presented on revising conditions for access to the OPTN Computer System. Ms. Jett shared that the objectives of the conversation were for the NOOC to determine the key information needed for the data use agreement (DUA) and interconnection security agreement (ISA) templates and determine the appropriate timeframe to allow members to complete a DUA or an ISA. Ms. Jett reviewed the NIST 800-53 control standard that the OPTN was following for access to the OPTN Computer System.

Ms. Jett reviewed key pieces of information that are included in the DUA template, including destruction of data at the completion of use, permitted uses of related data, and prohibited uses of released data. Ms. Jett noted that permitted uses of released data includes candidate and donor data, and data pertaining to offering, evaluating, and responding to organ offers. Ms. Jett explained that prohibited uses of released data means members cannot provide data, deidentified or otherwise, to anyone outside of the member or the subcontractors, they cannot use released data for any commercial purpose that could have a negative impact on patient welfare, and they cannot use released data for research or analysis purposes.

Ms. Jett reviewed key pieces of information that are included in the ISA template, including member connected system details, topology drawings, data descriptions, security controls for the data exchange, and amendment and modification procedures. Ms. Jett noted that member connected system details include system description, location, user community, and points of contact. Ms. Jett shared that data description includes questions on the purpose of the data exchange and the description of data and data classification. Ms. Jett shared that security controls for the data exchange include formal security plans, incident reporting and response, and risk management.

Ms. Jett asked the committee to consider if there is anything that should be added or removed from the DUA or ISA templates, how long members should have to complete the ISA, and how long members should have to complete the DUA. The committee discussed potential options for each question.

Summary of Discussion:

A committee member asked if there would need to be a separate DUA in place for members to utilize their own data within the OPTN Computer System. The committee considered this point, and ultimately decided that they would need to clarify this point within the draft DUA language.

A committee member asked if DUAs or ISAs take members longer to complete, to which Ms. Jett shared that based on information available, it appears ISAs take members longer to complete. A committee advisor commented that although ISAs are important and need to be adopted by the OPTN, they will be a potential barrier in API adoption. The committee advisor noted that ISAs are labor intensive and there will be an increase in communications between the OPTN and the organizations with ISAs. A representative from HRSA asked what could be done by the OPTN to help lessen this burden on members. Multiple committee advisors commented that although ISAs are labor intensive, they should be implemented as they are an important security measure. When discussing the key pieces of information included in ISAs, a representative from HRSA commented that there nothing was missing from draft language.

The committee discussed how long the NOOC should allow members to complete DUAs and ISAs. The committee discussed the possibility of 30-, 45-, and 60-day timeframes. Multiple committee advisors commented that DUAs are easier and quicker for members to complete and therefore the timeframe could be shorter than ISA completion time. A committee advisor suggested the NOOC implement a 60–90-day timeframe for members to complete their ISAs. If they do not complete them by this time, then their connection could be turned off. The committee discussed that this will be an important question to highlight during public comment.

The committee decided to implement a 30-day timeframe for DUA completion and a 60-day timeframe for ISA completion.

Next Steps:

The committee will vote on the official DUA and ISA language to be submitted for public comment during a future meeting.

4. HRSA Audit Update

Contractor staff presented an update on the HRSA audit. Contractor staff shared that HRSA published the security assessment report (SAR)on the OPTN's system on December 26, 2023. They shared that the report contained no unexpected findings. HRSA issued eight findings to the contractor, seven of which were self-identified during the audit. Contractor staff noted that out of the eight findings, five were rated moderate and three were rated low.

Summary of Discussion:

A committee member asked if the eight findings had been mitigated and resolved. Contractor staff explained that contractor staff are currently working through the findings. A representative from HRSA stated that HRSA will perform other audits in the future and different components of the system will be audited.

Next Steps:

The committee will discuss the audit in more detail at a future meeting.

5. Migration of the OPTN Computer System to the Public Cloud

Dale Smith, Chief Financial Officer, shared that the purpose of this agenda item was to receive input from the committee on the migration to the cloud.

Michael Ghaffari, Senior Director of Technology Development, explained that the objectives of the conversation were to provide detail on the alternative approach of componentization and provide HRSA an opportunity to share feedback. Mr. Ghaffari presented the differences between the lift and shift approach and componentization. Mr. Ghaffari then presented the proposed approach to componentization and shared ideas on how and where the OPTN could start componentizing the OPTN Computer System.

The NOOC was asked to provide feedback on the componentization approach and whether they believe the OPTN should continue their work in migrating the OPTN Computer System to the public cloud.

Summary of Discussion:

A committee member asked if NOOC could select from various components of the proposed project. The committee member stated that the components would likely be based on effort and cost.

6. **Closed Session**

The committee met in a closed session.

The meeting adjourned.

Attendance

- **Committee Members and Advisors**
  - Bruno Mastroianni
  - Colleen McCarthy
  - Daniel Yip
  - Edward Hollinger
  - James Pittman
  - Kelley Hitchman
  - Laura Butler
  - Paul Connelly
- **HRSA Representatives**
  - Adriane Burton
  - Aite Aigbe
  - Christopher McLaughlin
  - Cliff Myers
  - Jason Kattman
  - Manjot Singh
  - Nick Lewis
  - Nombeko Payne
  - Pilar Martinez
  - Trent Wallace
  - Vanessa Arriola
  - Vinay Vuyyuru
- **UNOS Staff**
  - Amy Putnam
  - Anna Messmer
  - Courtney Jett
  - Dale Smith
  - Jacqui O'Keefe
  - Julie Chatman
  - Liz Robbins Callahan
  - Michel Ghaffari
  - Morgan Jupe
  - Rebecca Murdock
  - Rob McTier
  - Ryan Ehrensberger
  - Susie Sprinson
  - Terry Doolittle
  - Tiwan Nicholson