

Revise Conditions for Access to the OPTN Computer System

*OPTN Network Operations Oversight Committee
Dr. Daniel Yip, Chair*

Purpose of Proposal

- Enhance the security of the OPTN Computer System by revising conditions for access
- Expand accountability for securing the OPTN Computer System to business organizations who access the OPTN Computer System
- Require all members with system interconnections to the OPTN Computer System to develop an Interconnection Security Agreement (ISA) with the OPTN

Proposal

- Enhance the security of the OPTN Computer System through the following proposed changes:
 - Require OPTN membership as a condition of access to the OPTN Computer System
 - Limit reasons for access to the OPTN Computer System to facilitating organ transplantation, fulfilling OPTN Obligations, and quality assurance and performance improvement (QAPI)
 - Require reporting of privacy incidents involving data obtained from the OPTN Computer System
 - Require all members with system interconnections to the OPTN Computer System to develop an Interconnection Security Agreement (ISA) with the OPTN
 - Require OPTN business members who access the OPTN Computer System to follow the same information security requirements that apply to other member types who access the OPTN Computer System
- Reduce potential barriers to OPTN business membership

Proposal Continued

- Builds on the *Establish Member System Access, Security Framework, and Incident Management and Reporting Requirements Policy*
- These requirements would:
 - Enhance system safety and support additional protection of OPTN data
 - Provide the OPTN with an avenue for increased accountability and oversight regarding access to the OPTN Computer System
 - Reduce barriers for new and small businesses to become OPTN members

Member Actions

- All members will be required to report privacy incidents to the OPTN
- Members will need to educate their users on permissible reasons for access to the OPTN Computer System
- Members with system interconnections to the OPTN Computer System to develop an Interconnection Security Agreement (ISA) with the OPTN
- Business organizations will need to apply for OPTN business membership
- OPTN business members who access the OPTN Computer System must follow the same information security requirements that apply to other member types who access the OPTN Computer System

Additional Information

- NOOC continuing conversations with HRSA on the following topics:
 - Definition of OPTN Data
 - Requirement for all members who access the OPTN Computer System to execute a Data Use Agreement (DUA) with the OPTN
- These topics will be addressed in a future proposal

What do you think?

- Do you agree with the bylaw changes for OPTN membership regarding small and new businesses?
- Is the proposed transition plan feasible for members?
- Are there any additional obstacles to completing the transition plan that members are aware of?
- A DUA is an “executed agreement between a data provider and a data recipient that specifies the terms under which the data can be used”. The Committee will be releasing a follow-up proposal which will require all members who access the OPTN Computer System to execute a DUA with the OPTN. To help develop this proposal, the Committee is requesting community feedback on necessary DUA requirements.

FAQ

- What are the proposed permissible reasons for access to the OPTN Computer System?
- Does this proposal remove any existing requirements for access to the OPTN Computer System?
- What is an Interconnection Security Agreement (ISA)?
- What will change for business member's access to the OPTN Computer System?

Additional Questions?

- IT Information Security (Access.Management@unos.org)
- Member Questions (Member.Questions@unos.org)

Provide Feedback

Submit public comments on the OPTN website

- July 31 – September 24, 2024
- **optn.transplant.hrsa.gov**



Regional Meeting Information

- Visit <https://optn.transplant.hrsa.gov/about/regions/regional-meetings/> for the latest regional meeting information and meeting materials

The screenshot shows the top navigation bar of the OPTN website with links for About, Policies & bylaws, Patients, Professionals, Data & calculators, and News & events. Below the navigation bar is the header 'Organ Procurement and Transplantation Network'. The main content area features a large blue banner with the title 'Regional meetings'. Below the banner is a breadcrumb trail: Home » About » Regions » Regional meetings. On the left side, there is a sidebar menu with three items: 'WHAT IS THE OPTN', 'OPTN MEMBERSHIP', and 'GOVERNANCE', each with a downward arrow. The main content area has a sub-header 'Regional Meetings' in green, followed by a paragraph: 'Regional meetings are held twice each year during the winter and summer public comment periods. Regional meetings are an opportunity to influence policy proposals, prepare for upcoming changes, and hear perspectives from the transplant community about improvements to organ allocation.' Below this paragraph is a link: 'Here's [what you can expect](#) at regional meetings. New to the public comment process? [Learn more here.](#)'

Thank You For Listening!