

OPTN Network Operations Oversight Committee

Meeting Summary

April 12, 2024

Webex

Daniel Yip, MD, Chair

Introduction

The Network Operations Oversight Committee (NOOC) met via Webex on 4/12/2024 to discuss the following agenda items:

1. Welcome
2. OPTN Member Security – First Wave Attestations Update
3. Revise Conditions for Access to the OPTN Computer System
4. NOOC Metrics Q&A
5. 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 Update

Terry Doolittle, Member Security Program Manager, explained that the goals of the presentation were to share lessons learned during the first wave of member security attestations, understand how these lessons were incorporated into the second wave of attestations, inform the committee of gaps that have been identified in the first wave of attestations, and to inform the committee that they will receive metrics on member security postures/risk status in May 2024.

Mr. Doolittle shared that the two key pieces of feedback received pertained to the requirement for members to respond to multiple attestations when they belonged to the same organization. Mr. Doolittle explained that the OPTN plans to change this requirement in the future to ease member burden. Mr. Doolittle also shared that they learned which questions are often responded to and which are not responded to by members. As part of the second wave of attestations, communications were sent to members that addressed these two concerns.

Mr. Doolittle shared the current trends of the member security attestations, noting that some gaps may warrant further review by the committee. He shared that the first wave of attestations will be reviewed in depth during a future committee meeting, and he shared that the second wave of attestations has been sent out to members and is due back in June 2024.

Summary of Discussion:

The committee discussed whether there was a need to implement corrective action measures for members to address identified gaps. Mr. Doolittle shared that the gaps identified within member systems will be used as a measure for individual members during their next attestation. He shared that unless a minimum level of compliance is determined, then there are no requirements for a remediation plan for members. Contractor staff also shared that although there is no requirement for a remediation

plan, the OPTN is opening these gaps for members and members are allowed to provide information to the OPTN on these gaps. Opening gaps for members allowed them the option to remediate and implement identified security controls or make a risk-based decision and not implement a control at this time. The member must then provide their decision on addressing the identified gaps to the OPTN.

The committee discussed whether there was a need for educational resources for the community on completing their security attestations. Contractor staff identified webinars as a potential opportunity to provide more education to members.

The committee discussed the use of multi-factor authentication and that members may not have these measures in place due to heavy implementation burden. The use of multi-factor authentication can impact a member's security posture.

The committee determined that there should not be any action taken against members that were late turning in their attestations as they were all turned in by the time of the meeting and all members were in communication with the OPTN.

Next steps:

The first wave of attestation metrics will be reviewed with the committee during a later 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 the background and goals of the project and provided the committee with an update on the project. She shared that Dr. Yip had presented on the project to the Data Advisory Committee (DAC) in March, and the DAC provided substantive feedback, some of which requires additional legal review on privacy and ownership of OPTN Data once incorporated into a recipient's medical record. She shared that currently, the contractor is reviewing the data use agreement (DUA) and OPTN Data legal boundaries with HRSA and this conversation will be brought back to the committee for further discussion once feedback has been received from HRSA.

Ms. Jett presented on DUA implementation and asked the committee to consider whether all members will be required to sign the same DUA or whether edits or redlines will be permitted by members. The committee discussed the options to consider within a DUA. The committee agreed to standardize the DUA for all members but to have a review pathway in place for any exceptions, and to implement standardized guidance for staff reviewing DUAs. Ms. Jett noted that the NOOC or HRSA will need to decide whether a DUA is approved, as this cannot be a contractor decision. Committee members agreed to help edit the DUA language.

Summary of Discussion:

When discussing DUA implementation, a committee member raised a concern about members returning DUAs in a timely manner. A committee advisor suggested that it would be easier for the contractor to have everyone sign the same DUA, however they were not sure whether it would be realistic for one DUA to fit the needs of all members. The committee discussed that if the DUA is broad enough, then it could apply to all members.

The committee discussed who would review member DUAs and suggested that the same group review them to ensure consistency. A committee member commented that every member that is connected to the OPTN Computer System should have to sign an OPTN DUA as it would be unfair for some members to have signed a DUA, while others have not.

The committee was asked to consider who the appropriate party would be at each member institution to ensure the requirements set forth in the DUA and interconnection security agreement (ISA) are adhered to. The committee discussed having the information security contact or the site security administrator fill this role.

Next Steps:

The contractor will continue to have discussions with HRSA on the DUA and OPTN Data. Once these conversations are complete, then the contractor will share the findings with the committee for discussion.

4. NOOC Metrics Q&A

The NOOC metrics report for the first quarter of Fiscal Year 2024 was shared with the committee ahead of the meeting for their review. Committee members were encouraged to bring any questions they had to the meeting.

There were no comments or questions from the committee on the metrics report update.

5. 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
 - Laura Butler
 - Paul Connelly
 - Willscott Naugler
- **HRSA Representatives**
 - Adriana Alvarez
 - Christopher McLaughlin
 - Clifton Myers
 - Demonique Lewis
 - Manjot Singh
 - Steve Keenan
 - Vinay Vuyyuru
- **UNOS Staff**
 - Anna Messmer
 - Courtney Jett
 - Jacqui O'Keefe
 - James Alcorn
 - Jonathan Moore
 - Kimberly Uccellini
 - Laura Schmit
 - Lindsay Larkin
 - Marty Crenlon
 - Michael Ghaffari
 - Morgan Jupe
 - Rob McTier
 - Susie Sprinson
 - Terry Doolittle
 - Tiwan Nicholson
 - Tynisha Smith