**OPTN Network Operations Oversight Committee**
**Meeting Summary**
**October 7, 2024**
**Webex**

**Andrew Kao, MD, Chair**

**Introduction**

The Network Operations Oversight Committee (NOOC) met via Webex on 10/07/2024 to discuss the following agenda items:
1. Welcome
2. Revise Conditions for Access to the OPTN Computer System Public Comment Analysis

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

**1. Welcome**

Andrew Kao, Chair of the NOOC, welcomed committee members and advisors to the meeting and presented the agenda.

**2. Revise Conditions for Access to the OPTN Computer System Public Comment Analysis**

Contractor staff shared that the purpose of the meeting was to review public comment feedback and analysis, the background of the proposal, and questions posed to the community during public comment. Contractor staff shared the sentiment scores the proposal received during public comment, separated by member type and regional affiliation.

Contractor staff shared that the common themes from public comments were:

1. Security of OPTN system,
2. Business member users within the OPTN Computer System,
3. Permissible reasons for access to the OPTN Computer System,
4. Interconnection Security Agreements (ISAs),
5. Security requirements,
6. Transition procedures,
7. Data Use Agreements (DUAs), and
8. System function

Contractor staff shared feedback focusing on these main themes and presented how the NOOC could incorporate feedback into the proposal. The Committee discussed the feedback and incorporated changes into the proposal. Contractor staff shared that there was broad support for the proposal. Contract staff highlighted that there was concern for the potential risk of expanding access to business members with suggestions to limit access to the OPTN Computer System. The proposal received support for privacy incident reporting, incorporation of ISAs and the eventual adoption of DUAs. It was noted that a majority of the feedback received can be clarified in educational resources and did not need to be addressed in policy language.

Contractor staff presented on the suggested incorporation of language on Information Security Contact requirements. They shared that the proposed language shared during public comment stated that the Information Security Contact would need to be someone that is in an active information security role at

the member organization they are the contact for. Contractor staff explained that many members do not have an active information security contact at their institution within transplant that could serve in this role if the new language were adopted. The committee discussed removing this language so members would not be incompliant with the policy requirement.

Summary of Discussion:

The Committee discussed each of the public comment themes and how feedback could be incorporated. When discussing the security of the OPTN Computer System, a committee member suggested the briefing paper include information about the expertise of NOOC members and advisors for the community's knowledge.

The committee also discussed feedback related to business member access to the OPTN Computer System. Committee members shared feedback they received during their presentations at regional meetings and during committee meetings. Committee members shared that the community was unclear about some of the proposed changes, and they discussed including information on what business membership would include and how business member roles within the OPTN could change.

The committee discussed providing educational materials and other supporting documentation to the community on all changes. While reviewing public comment feedback, the committee discussed what membership includes for business members and how it looks different from other membership types, how their membership is defined, whether the OPTN should create different tiers of business members, and whether business members can still access the OPTN Computer System as a third party through another member's connection. While discussing these topics, the committee discussed revisiting the parameters of business member's access to the OPTN Computer System. The NOOC Chair suggested the definition of business membership be included in the final briefing paper to answer any questions from the community on the topic. A representative from HRSA encouraged the committee to revisit this discussion at a later time and contractor staff noted that this could be included in educational materials to accompany the briefing paper.

When discussing permissible reasons for access to the OPTN Computer System, the committee discussed adding clarification to the narrative of the briefing paper to explain the proposal would not affect access to STAR files. The committee discussed incorporating information in the proposal on accessing the OPTN Computer System for research purposes. The committee also discussed how to clarify the term "facilitating organ transplantation" to include post-transplant follow-up of donor data and that this was important to include in the language of the supporting documentation.

The committee discussed Interconnection Security Agreements (ISAs) and the timeframe that members should have to complete them. The committee discussed who must complete an ISA with the OPTN and who is responsible for an ISA when a member uses software licensed by another member utilizing APIs. The committee decided to include clarification in the briefing paper on who would be responsible for executing ISAs between transplant centers and business members.

The committee discussed modifying the original proposal to remove user access from 12 to 24 hours at the end of employment. The committee discussed whether 18 months was enough time to transition and fully implement all portions of the proposal. The committee decided this timeline was appropriate and that they would include additional educational materials for members. A committee member asked HRSA for feedback on the status of Data Use Agreements (DUAs), and HRSA did not offer a timeline for when additional information would become available.

Committee members continued to ask clarifying questions about the OPTN Computer System and the proposal, but these items were not applicable to include in the final proposal or briefing paper due to the scope of the proposal.

The committee modified the proposed language on requirements for Information Security Contacts. The committee agreed to remove the requirement that the Information Security Contact be an active information security role at a member organization. The committee also discussed the title of the 'Information Security Contact' and suggested the committee change the title to provide clarity to the community on the role.

Next Steps:

Contractor staff will incorporate the NOOC's feedback into the briefing paper and policy language. The committee will review the final draft and will meet to take action on the final proposal to send to the Board of Directors.

The meeting adjourned.

**Attendance**

- **Committee Members and Advisors**
  - Andrew Kao
  - Bruno Mastroianni
  - Daniel Yip
  - Gaurav Gupta
  - Glen Kelley
  - Kelley Hitchman
  - Laura Butler
  - Paul Connelly
- **HRSA Representatives**
  - Christopher McLaughlin
  - Cliff Myers
  - Manjot Singh
  - Steve Keenan
  - Vinay Vuyyuru
- **UNOS Staff**
  - Alex Carmack
  - Amy Putnam
  - Anna Messmer
  - Kimberly Uccellini
  - Krissy Laurie
  - Lauren Mauk
  - Lindsay Larkin
  - Liz Robbins Callahan
  - Michael Ghaffari
  - Morgan Jupe
  - Rob McTier
  - Terry Doolittle