

OPTN Network Operations Oversight Committee

Meeting Summary
September 16th, 2022

Webex

Edward Hollinger, MD, PhD, Chair

Introduction

The Network Operations Oversight Committee (NOOC) met via Webex on 09/16/2022 to discuss the following agenda items:

1. Welcome
2. OPTN Member Information Security Policy and Bylaw Enhancements

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

1. Welcome

Ed Hollinger, Chair of the Network Operations Oversight Committee, introduced the purpose of the meeting for the committee to continue their discussion on the network security project. The goal of the meeting was to create a member level user agreement to develop a more comprehensive strategy for the OPTN Computer System. Dr. Hollinger asked each member to contribute their area of expertise to the project and to represent their area of the transplant system.

2. OPTN Member Information Security Policy and Bylaw Enhancements

The committee reviewed the proposed changes to the OPTN Members Information Security Policy Bylaw. The committee discussed next steps on how to best solicit feedback from the OPTN Member Groups.

Liz Robbins Callahan, UNOS Special Counsel, presented the security enhancement project and recapped what the committee has been working on since the last meeting. The goal of the meeting was to better define which OPTN members have access to the OPTN Computer System and the parameters of each members own security needs. The committee reviewed the drafted policy changes to address these concerns.

The committee discussed the definition of the OPTN Computer System to ensure that the definition captures everything the committee intends. The committee discussed setting minimum security standards for member organizations but, the main questions was how to define these standards. The committee wanted to make sure that the standard is widespread enough to cover future changes, while also ensuring that the standards are not too vague. A question was also posed whether not the standards need to vary depending on member organization type.

Summary of Discussion:

The committee discussed the importance of adding definitions and explaining naming conventions to the bylaw proposal. Mr. Chris McLaughlin shared that the OPTN could identify the member categories that may potentially have access, such as transplant hospitals, OPOs, and Histocompatibility Labs. With the different organization types, it may be important that each type of organization has unique requirements for the security systems. A committee member agreed that there should be one set

standard for member organizations and this the standard that everyone must adhere to in order to protect the OPTN Computer System. A committee member noted the importance of including member type because member organizations use the OPTN Computer System very differently than one another. They suggested the possibility of matching the security standard to the level of associated risk. It was noted that the committee will need to consider how to enforce these potential changes. A suggestion was made to not require specific security standards but require notification of potential security incidents. The committee discussed using similar frameworks from other organizations, as well as the challenge of setting security standards that will be applicable in the future as systems change.

HRSA noted the importance of HRSA's choosing a standard rather than enumerating the entire policy so that the OPTN can make sure all the members are adhering to the standards. UNOS staff suggested the incorporation of policy that states that each member is responsible for their users. HRSA noted that there may not be granular recommendations but the OPTN could use attestations that are signed by the responsible party for the member institution. It was noted that these changes could be challenging for smaller institutions.

NEXT STEPS:

The NOOC was asked to collect information on their own member organization IT security requirements and bring this information back to the committee.

Upcoming Meetings:

- October 20th, 2022
- November 15th, 2022

Attendance

- **Committee Members and Advisors**
 - Adam Frank
 - Clifford Miles
 - Bruno Mastroianni
 - Ed Hollinger
 - Jeff Sterrette
 - Kelley Hitchman
 - Melissa McQueen
- **HRSA Representatives**
 - Adriana Martinez
 - Adrienne Goodrich-Doctor
 - Arjun Naik
 - Chris McLaughlin
 - Cliff Myers
 - Nick Lewis
 - Satish Gorrela
 - Vanessa Arriola
- **UNOS Staff**
 - Amy Putnam
 - James Jobes
 - Kristina Althaus
 - Leonyce Moses
 - Liz Robbins Callahan
 - Michael Ghaffari
 - Morgan Jupe
 - Ralph Medina
 - Rob McTier
 - Sarah Payamps
 - Terri Helfrich
 - Tiwan Nicolson
 - Tynisha Smith