

## **OPTN Network Operations Oversight Committee**

### **Meeting Summary**

**January 22, 2025**

**Webex**

**Andrew Kao, MD, Chair**

### **Introduction**

The Network Operations Oversight Committee (NOOC) met via Webex on 01/22/2025 to discuss the following agenda items:

1. Welcome
2. Member Security Program – Year 1 Attestation Metrics
3. Closed Session

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

#### **1. Welcome**

Andrew Kao, Chair of the Network Operations Oversight Committee (NOOC) welcomed committee members and advisors to the meeting and presented the agenda.

#### **2. Member Security Program – Year 1 Attestation Metrics**

Contractor staff shared an update regarding Year 1 member security program attestation metrics. During the last NOOC meeting, the group discussed that they would be analyzing the level of controls that members are not in compliance with, and why members may not be in compliance.

#### Summary of Presentation:

While most organizations met 75%+ compliance, some lagged in critical areas. Certain organizations fell in the 35-75% range, indicating moderate compliance and a small number had less than 35% compliance, raising concerns about security risks. Key areas of concern included multi-factor authentication (MFA), incident response plans, unauthorized software control, removable media policies, and encryption standards.

Many organizations had only partially implemented multi-factor authentication, with some applying it only to remote or privileged users and a few lacking it altogether. Incident response planning was another major gap, as over 100 members did not have a formal plan to notify OPTN in case of a security breach, despite this being a policy requirement. Similarly, many organizations lacked a system to control unauthorized software installations, creating potential risks from malicious or unapproved applications. The use of removable media, such as USB drives, was another area of concern, as some organizations had no restrictions in place, leaving them vulnerable to security threats. Additionally, it was discovered that there was no encryption on sensitive data, exposing protected health information (PHI) and personally identifiable information (PII) to possible breaches.

#### Summary of Discussion:

Committee members expressed skepticism about the accuracy of self-reported compliance data, noting that third-party audits might reveal lower actual compliance. There was also concern that business constraints, such as budget and staffing, influenced security priorities, making it difficult for some

organizations to fully implement necessary controls. Furthermore, the committee acknowledged that there was no clear remediation process for organizations that fall below compliance thresholds.

To address these challenges, the committee considered defining essential security controls that all organizations must implement, such as multi-factor authentication and incident response plans. They also discussed the need for a structured remediation process for organizations that fall below compliance thresholds.

Future audits will play a critical role in validating self-reported attestation data, ensuring that organizations are accurately meeting their security standards. Additionally, there was interest in revising the attestation form to improve clarity and efficiency while also exploring resources, such as templates and training, to help organizations meet security expectations. Some members felt that the current format was too cumbersome and contained unclear questions.

Next Steps:

Before moving forward with the next attestation cycle, the committee plans to review the current attestation form to ensure that it gathers the most relevant information while minimizing unnecessary complexity. Members commented that a more user-friendly approach could improve response accuracy and reduce the burden on organizations completing the attestation.

### **3. Closed Session**

The committee met in a closed session.

#### **Upcoming Meetings**

- February 19, 2025
- March 12, 2025
- April 9, 2025

## Attendance

- **Committee Members and Advisors**
  - Andrew Kao
  - Bruno Mastroianni
  - Colleen McCarthy
  - Daniel Yip
  - Deborah Levine
  - Edward Hollinger
  - Glen Kelley
  - Kelley Hitchman
  - Laura Butler
  - Paul Connelly
  - Sandra Amaral
- **OPTN Interim Executive Director**
  - Rexanah Wyse Morrissette
- **HRSA Representatives**
  - Manjot Singh
  - Vinay Vuyyuru
- **UNOS Staff**
  - Bryan Carnahan
  - Kim Uccellini
  - Jacqui O'Keefe
  - Lauren Mauk
  - Jonathan Moore
  - Krissy Laurie
  - Lindsay Larkin
  - Michael Ghaffari
  - Morgan Jupe
  - Rob McTier
  - Taylor Michalski
  - Tynisha Smith