Revise Conditions for Access to the OPTN Computer System

OPTN Network Operations Oversight Committee
Dr. Daniel Yip, Chair

OPTN ORGAN PROCUREMENT AND TRANSPLANTATION NETWORK

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

Thank You For Listening!