

OPTN Network Operations Oversight Committee

Meeting Summary

June 20, 2024

Webex

Daniel Yip, MD, Chair

Introduction

The Network Operations Oversight Committee (NOOC) met via Webex on 06/20/2024 to discuss the following agenda items:

1. Welcome
2. Required Security Training
3. Revise Conditions for Access to the OPTN Computer System
4. Member Security Program Attestations Update
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. Required Security Training

Contractor staff presented the required security training for OPTN members based on OPTN Policy 3.1. Contractor staff explained that there are members with outstanding training requirements to complete. Contractor staff presented data to the committee, the communications that have been sent to members, potential options for next steps, and asked for the committee's recommendation on how to proceed.

Summary of Discussion:

Committee members discussed their personal experiences with the training and drew from these experiences to guide their recommendations on next steps. Committee members suggested changes in communication efforts and suggested that the communications for incomplete trainings go to each member's site security administrators and the user who has not completed the training. A committee member also suggested that member's transplant administrators be notified of which users have not completed their training. While discussing the training and who receives notifications for incomplete training requirements, the committee discussed the need to change the title of site security administrator, as the committee commented that the title is similar to other titles within OPTN policy.

The committee suggested that communications be sent to users and their site security administrators automatically when the due date has passed. Contractor staff confirmed that this is viable and can be automated. A committee member suggested that the contractor duplicate the automatic function used in the OPTN Computer System to notify users when they must change their password. The committee discussed the details of the communication. The committee decided to allow users 72-hours to complete their training once they have received the reminder.

Next steps:

Communications will be sent to users and their site security administrators who have not completed the training. If there are still users that do not complete the training 72-hours after the reminder is sent, then the NOOC will determine next steps.

3. Revise Conditions for Access to the OPTN Computer System

Courtney Jett, Policy Analyst, presented that the goal of the discussion was for the committee to make decisions on final policy language to be sent to Summer 2024 Public Comment. Ms. Jett shared that there have been substantive policy language changes to the proposal since the committee last met. She shared that these changes include:

- Removing of data use agreements (DUA) requirements and definition of OPTN Data.
- Changing the definition of a privacy breach to a privacy incident to align with new privacy reporting alignment within the OPTN contract.
- Adding timeframes for site security administrator permissions reviews and reporting in policy to align with the current site security administrator agreement and training.
- Defining the subset of data for which privacy incidents must be reported to the OPTN.
- Requiring information security contacts to fulfill an information security role at their organization.

A representative from HRSA and contractor staff discussed that the definition of OPTN Data is currently undergoing legal review from HRSA to determine when the data is owned by the OPTN versus when it is not. A representative from HRSA asked that the language on DUAs and OPTN Data be included in the proposal, even if HRSA has not completed their legal review of the topics, with a disclaimer that the language will change after HRSA legal review is complete. Contractor staff explained that because the NOOC has not reviewed the current language on DUAs and OPTN Data, it would be challenging to add these topics to the proposal at this point in the process. Contractor staff explained that the language pertaining to DUAs and OPTN Data can potentially be submitted for special public comment once the HRSA legal review is complete.

The committee discussed the changes to access the OPTN Computer System for business members. Contractor staff explained that conditions for access changed so that business members did not have to be in operation for one year before gaining access, and that these members are now only required to be in partnership with one or more active OPTN members.

The committee discussed the policy language as it stood and offered some modifications before submitting the final language to public comment. One notable change to the policy language was that the NOOC suggested changing the name of Site Security Administrator to Access Administrator to avoid confusion.

Next Steps:

The committee will vote on the final policy language to be submitted for Summer 2024 Public Comment via email.

4. Member Security Program Attestations Update

Terry Doolittle, Manager of Information Security Operations, presented an update on the member security program attestations. Mr. Doolittle shared information on the second wave of attestations that closed June 16, 2024. Mr. Doolittle noted that 46 members still had outstanding attestations and some of these members had their initial submissions returned to make requested updates. Mr. Doolittle shared that updated metrics on the second wave of attestations will be shared with the NOOC during a future meeting.

Dr. Yip noted that there was a large number of members who did not submit their attestations during the second wave compared to the first wave. Dr. Yip asked the committee to think of remediation standards they could follow for members who do not complete their attestation.

5. Closed Session

The committee met in a closed session.

The meeting adjourned.

Attendance

- **Committee Members and Advisors**
 - Bruno Mastroianni
 - Daniel Yip
 - Kelley Hitchman
 - Laura Butler
 - Paul Connelly
- **HRSA Representatives**
 - Chris McLaughlin
 - Clif Myers
 - Demonique Lewis
 - Manjot Singh
 - Steve Keenan
 - Vinay Vuyyuru
- **UNOS Staff**
 - Anna Messmer
 - Courtney Jett
 - Kimberly Uccellini
 - Lindsay Larkin
 - Liz Robbins Callahan
 - Lloyd Board
 - Morgan Jupe
 - Rob McTier
 - Roger Vacovsky
 - Susie Sprinson
 - Terry Doolittle
 - Tiwan Nicholson
 - Tynisha Smith