


General Information

PTA / PIA Name:	HRSA - OPTN - QTR2 - 2025 - HRSA1445982	PTA / PIA ID:	3924307
Component Name:	HRSA - National Organ Procurement and Transplantation Network	ATO Boundary Name:	National Organ Procurement and Transplantation Network
Overall Status:	Complete 	# of Days - Open:	198
Submitter:		Submit Date:	1/8/2026
Next Assessment Date:	01/13/2029	Expiration Date:	1/13/2029
Office:		OpDiv:	HRSA
Security Categorization:	High		
Make PIA available to Public?:	Yes	PIA Required:	Yes
General 01:	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
General 02:	Is this a FISMA-Reportable system?		Yes
General 03:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		Yes
General 04:	ATO Date or Planned ATO Date.		1/31/2025
General 05:	Is the system or electronic information collection, agency or contractor operated?		Contractor
History Log:	View History Log		

Privacy Threshold Analysis**Privacy Threshold Analysis**

PTA 01:	Point of Contact (POC) Name	Ernest Boakye
PTA 01A:	POC Title and Organization	ISSO (HRSA)
PTA 01B:	POC Email Address	EBoakye@hrsa.gov
PTA 01C:	POC Phone Number	301 443 0413
PTA 02:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)

PTA 02A:	Describe in further detail any changes to the system that have occurred since the last PIA.	There have been significant changes within the system since the last PIA refresh/validation. For all changes that have occurred, including the use of Artificial Intelligence (AI) for predictive analytics, the OPTN contractor distributes System Notices and are also announced on the system. Infrastructure changes are maintained in the OPTN Contractor's Change Control System and Agency staff are a part of the review and approval process.
PTA 03:	Is the data contained in the system owned by the agency or contractor?	Agency
PTA 04:	Please give a brief overview of the purpose of the system by describing what the functions of the system are and how the system carries out those functions in support of HHS.	The system uses AI functionality with Predictive Analytics to increase offer acceptance and kidney utilization, to better support the systems functionality. Broadly, predictive analytics is the use of data, statistics and modeling to predict the likelihood of future outcomes. Offer Decision-Making with Predictive Analytics in DonorNet® aims to increase offer acceptance and kidney utilization, uses statistical modeling to show potential impact on patient when accepting or declining an offer, and displays predicted Time-To-Next-Offer and patient mortality over that time. Ultimately the predictive analytics tool, along with other components of UNet SM technology, are designed to help transplant teams get their patients transplanted as quickly as possible.

<p>PTA 05:</p>	<p>List and/or describe all the types of information that are collected, maintained, and/or shared by the system regardless of whether that information is PII and how long that information is stored.</p>	<p>The system collects, maintains, and shares information (records) about potential donors and transplant candidates required for organ matching, placement, and follow-up as authorized by 42 U.S.C. 274a, 42 U.S.C., 274(b)(2)(H) and CFR part 121 authorized the OPTN collection of the information included in the Organ Procurement and Transplantation Network (OPTN)/ Scientific Registry of Transplant Recipients (SRTR) Data System, HHS/ HRSA/HSB/DoT, System of Record Notice 09-15-0055.</p> <p>This includes pre- and post-transplant clinical information such as donor registration, transplant candidate registration, transplant recipient registration, histocompatibility, transplant recipient follow-up, donor follow-up, registration of prospective organ donors who did not become donors, forms, and other non-registry operational information. These records include data elements including name, Social Security number, address, identifiers assigned by OPTN and SRTR contractors, hospital and hospital provider number, State and zip code of residence, citizenship, race/ethnicity, sex at birth, date and time of organ recovery, and transplantation, name of transplant center, histocompatibility information, donor medical information, recipient and donor medical information before and after transplantation, immunosuppressive medication, health care coverage, employment, and education level. This information mandated, collected, and are provided to the OPTN contractor by organ procurement organizations, histocompatibility laboratories, organ transplant centers, and health care providers which obtain the information directly from individuals or their representatives to facilitate organ placement and match donor organs with recipients.</p> <p>The system also collects credentials from authorized system users for the purposes of authentication to the system and for monitoring user behavior/activity and auditing purposes. The records are currently unscheduled and retained indefinitely pending completion of a disposition schedule approved by the National Archives and Records Administration (NARA).</p>
<p>PTA 05A:</p>	<p>Are user credentials used to access the system?</p>	<p>Yes</p>
<p>PTA 05B:</p>	<p>Please identify the type of user credentials used to access the system.</p>	<p>Non-HHS User Credentials</p> <p>Username</p> <p>Password</p>
<p>PTA 06:</p>	<p>Describe why each type of information is collected, maintained, and/or shared by the system. Specify what information is collected about each category of individual.</p>	<p>As authorized, the system collects, maintains, and shares information (records) about potential deceased and living donors and transplant candidates required for organ matching, placement, and follow-up. More explicitly categorized as:</p> <ol style="list-style-type: none"> 1. Individuals from whom organs have been obtained for transplantation. 2. Individuals who are candidates for organ transplantation.

3. Individuals who have been recipients of transplanted organs.
4. Individuals who are potential deceased organ donors.
5. Individuals who are potential living organ donors or individuals who intend to become living organ donors (even if the donation does not occur).
6. Individuals who donate organs for transplantation.
7. Individuals being evaluated for transplant receipt.

This includes pre- and post-transplant clinical information such as donor registration, transplant candidate registration, transplant recipient registration, histocompatibility, transplant recipient follow-up, donor follow-up, registration of prospective organ donors who did not become donors, forms, and other non-registry operational information. These records include data elements including name, Social Security number, address, identifiers assigned by OPTN and SRTR contractors, hospital and hospital provider number, State and zip code of residence, citizenship, race/ethnicity, sex at birth, date and time of organ recovery, and transplantation, name of transplant center, histocompatibility information, donor medical information, recipient and donor medical information before and after transplantation, immunosuppressive medication, health care coverage, employment, and education level. This information mandated, collected, and are provided to the OPTN contractor by organ procurement organizations, histocompatibility laboratories, organ transplant centers, and health care providers which obtain the information directly from individuals or their representatives to facilitate organ placement and match donor organs with recipients.

The system also uses this information for monitoring compliance of OPTN members with federal laws, regulation, and OPTN bylaws and policies, including risks to the health of patients or to public safety. The record is also used for reporting periodically to the public on the status of organ donation and transplantation in the United States and for researchers and government agencies to study the scientific and clinical status of organ donation and transplantation – to include transplantation-related public health surveillance including possible transmission of donor disease. The system also shares the information to HHS' Centers for Medicare & Medicaid Services (CMS) and to contractors of CMS business associates and the SRTR contractor with appropriate limitations, data protections, and safeguards. Data collected by the system are also shared with professionals providing clinical care for purposes including to monitor the individual's status in the OPTN system and to inform the individual's clinical care in order to assist in registering candidates on the waitlist and in facilitating organ placement and matching donor organs with recipients.

Finally, the system also collects credentials and ip addresses from authorized system users for the

		purposes of authentication to the system and for monitoring user behavior/activity and auditing purposes.
PTA 07:	Does the system collect, maintain, use, or share PII?	Yes
PTA 08:	Does the system include a website or online application?	Yes
PTA 08A:	Provide the URL(s).	https://portal.unos.org
PTA 08B:	Are any of the website or online applications accessible by the public (including publicly accessible log in pages)?	Yes
PTA 09:	Describe the purpose of the website, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response.	The website is used in support of the OPTN operations and used to facilitate the placement of donated organs with transplant candidates. Access is granted to authorized system users pursuant to OPTN policy and credentials (unique username, password, and MFA) are used to access the system.
PTA 10:	Does the website have a posted privacy notice?	Yes
PTA 11:	Does the website contain links to non-federal government websites external to HHS?	No
PTA 12:	Does the website use web measurement and customization technology?	No
PTA 13:	Does the website have any information or pages directed at children under the age of thirteen?	No
PTA 14:	Does the system have a mobile application?	Yes
PTA 14A:	Is the mobile application HHS developed and managed or a third-party application?	Third-party
PTA 15:	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	DonorNet Mobile® and TransNet Mobile®
PTA 16:	Does the mobile application have a privacy notice?	Yes
PTA 17:	Does the mobile application contain links to non-federal government websites external to HHS?	No
PTA 18:	Does the mobile application use measurement and customization technology?	No
PTA 19:	Does the mobile application have any information directed at children under the age of thirteen?	No
PTA 20:	Are any third-party websites or applications (TPWA) associated with the system?	No
PTA 21:	Does this system use artificial intelligence (AI) tools or technologies?	Yes
PTA 21A:	What are the AI tools and how are they used?	Predictive Analytics supports of the OPTN contract for data analytics and research. The Privacy Impact Assessment (PIA) will be updated to reflect any future AI use cases that introduce new privacy risks.

Privacy Impact Assessment

PIA 22:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Identifying Numbers Social Security Number Truncated SSN Financial Account Information (e.g., account numbers, credit card numbers) DUNS Biographical Information Name Date of Birth User Credentials Education Records Employment Status/History Military Status/History Biometrics/Distinguishing Features Biometric Identifiers (e.g., fingerprints, retina scans, DNA samples) Photographic Identifiers Medical Information Medical Records Medical Records Number Patient ID Number Other Other
PIA 22A:	Identify the “other” type(s) of personally identifiable information (PII) not mentioned in the above list.	Chart No., TIN, Provider License No.
PIA 23:	Indicate the categories of individuals about whom PII is collected, maintained, or shared.	Business Partners/Contacts (Federal state, local agencies) Patients Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)
PIA 24:	Indicate the approximate number of individuals whose PII is maintained in the system.	5,000 – 9,999
PIA 25:	For what primary purpose is the PII used?	Primarily used to facilitate organ placement and match donor organs with recipients
PIA 26:	Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).	Informs clinical care, support public health surveillance, provide data to researchers and government agencies for scientific and clinical studies, and is further collected, used, and disclosed by the authority described in System of Record Notice 09-15-0055, Final Rule, and to support the operations of the Organ Procurement and Transplantation Network (OPTN).

PIA 27:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID. If the Taxpayer IDs collected are only for businesses include that in your response.	The Social Security Number (SSN) is used to identify an individual candidate, recipient, or living donor. SSN are used for patient linkage with United States Renal Data System (USRDS), end-stage renal disease (ESRD) database for ESRD initiation and dialysis start dates, and the Social Security Administration Death Master File (SSADMF) for death ascertainment. SSN is also used to check for duplicate patient data in the system.
PIA 27A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID. If the Taxpayer IDs collected are only for businesses, you may respond N/A.	There's no authority specific to the collection and use of SSN; however, 42 CFR121 provides the OPTN the authority to collect data on donors, recipients, and transplant candidates as directed by the Secretary. Additionally, the SORN lists SSN as a data element collected and used by the OPTN.
PIA 28:	Identify legal authorities, governing information use and disclosure specific to the system and program.	42 CFR Part 121 – Organ Procurement and Transplantation Network (OPTN), 42 USC § 274 – Organ Procurement and Transplantation Network, Privacy Act at 5.U.S.C.552a(b)(1) and (2) and (b)(4) through (11).
PIA 29:	Are records in the system retrieved by one or more PII data elements?	Yes
PIA 29A:	Please specify which PII data elements are used to retrieve records.	Name, Social Security number, and other OPTN identifiers; or, other variations of the PII that is collected by the OPTN.
PIA 29B:	Provide the number, title, and URL of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or indicate whether a new or revised SORN is in development.	Modified system of records to system of records 09–15–0055, “Organ Procurement and Transplantation Network (OPTN)/ Scientific Registry of Transplant Recipients (SRTR) Data System,” maintained by HRSA, Health Systems Bureau.
PIA 30:	Identify the sources of PII in the system.	<p>Directly from an individual about whom the information pertains</p> <p>Other</p> <p>Government Sources</p> <p>Other Federal Entities</p> <p>Non-Government Sources</p> <p>Members of the Public</p> <p>Commercial Data Broker</p> <p>Private Sector</p>
PIA 30A:	Identify the “other” sources of PII in the system not mentioned in the above list.	OPTN members such as organ procurement organizations, histocompatibility labs, transplant hospitals, transplant candidates/recipients and/or members of their families. Data is also supplemented from other agencies such as Centers for Medicaid/Medicare Services and/or other members of the public, private sector, etc.
PIA 31:	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes

PIA 31A:	Provide the information collection approval number(s) and expiration date(s).	Yes. There are two OPTN data system information collection packages. The Data System for Organ Procurement and Transplantation Network (TIEDI) (OMB number, 0915-0157, expiration date: 09/30/2026) and the Organ Procurement and Transplantation Network Application Form (Membership) (OMB number 0915-0184, expiration date: 01/26/2026).
PIA 32:	Is the PII in the system shared directly with other organizations outside the system's Operating Division?	Yes
PIA 32A:	Identify with whom the PII is shared or disclosed.	<p>Other Federal Agency/Agencies</p> <p>Private Sector</p> <p>State or Local Agency/Agencies</p> <p>Within HHS</p>
PIA 32B:	For each disclosure, name the organizations/systems the system shares PII with and the purpose(s) of the disclosure.	<p>In addition to other disclosures authorized directly in the Privacy Act at 5 U.S.C. 552a(b)(1) and (2) and (b)(4)through (11), PII collection, use & disclosure authority as described in the SORN, OPTN Final Rule, OPTN Contract, OPTN Policies, and as the OPTN's designation as a "public health authority".</p> <ul style="list-style-type: none"> · Within HHS (HRSA) – as requested and as a OPTN Monthly Data File transmission · SRTR – OPTN Monthly data file transmission as directed by the OPTN Contract · Patient/Personal Representative – an individual or their authorized representative can request their complete patient record we hold (excludes Donor Information which is not disclosed as part of the patient record) · Patient Identified Data Requests for bona fide research purposes only – HRSA approval, HRSA Data Use Agreement, Research Plan, Security Plan and IRB approval required · Court ordered subpoenas, Civil or Criminal Law Enforcement, Litigation · UNOS Internal disclosures for roles that support the OPTN Contract requirements and operation (e.g. Research, Organ Center, Review Board, etc.) · State Registries and State Health Agencies such as Surveillance Epidemiology and End Results Program registries, State registries, and State health agencies, for purposes including: matching donor organs with recipients, monitoring compliance of member organizations with federal laws and regulations and OPTN requirements, reviewing and reporting periodically to the public on the status of organ donation and transplantation in the United States, and transplantation-related public health surveillance. · Congressional Office - HRSA may disclose records to a congressional office from the record of an individual in response to a written inquiry from the congressional office made at the written request of that individual. · physicians or other health care professionals providing clinical treatment \ for clinical purposes

PIA 32C:	List any agreements in place that authorize the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	The OPTN contract requires data sharing with Health and Resource Service Administration (HRSA) and with Scientific Registry of Transplant Recipients (SRTR) contractor, and with researchers and health care approved by HRSA. HRSA and Centers for Medicare & Medicaid Services (CMS) also has a Sharing Agreement for OPTN data.
PIA 32D:	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII. If no process or procedures are in place, please explain why not.	The OPTN contract requires data sharing with HRSA and a written agreement and schedule to share data with the SRTR contractor. In addition, HRSA, the OPTN, and HRSA contractors qualify as “public health authorities” for the purposes of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) regulation, “Standards for Privacy of Individual Identifiable Health Information” (Privacy Rule), 45 CFR Parts 160 and 164. Under 45 CFR 164.512, a “covered entity” may disclose an individual’s protected health information without the individual’s written consent or authorization when such a disclosure is made to a “public health authority” that is authorized by law to collect information for the purpose of preventing or controlling disease, injury, or disability. Given the legal authority and mandate of the OPTN, it has been determined that a “covered entity” may disclose certain individually identifiable health information to the OPTN without written consent or authorization of the individual, when the disclosure furthers the OPTN’s statutory purposes and functions. Under 42 CFR 121.11, the OPTN shall maintain records of all transplant candidates, all organ donors, and all transplant recipients and shall operate, maintain, receive, publish, and transmit such records and information electronically. The records are collected by transplant centers and Organ Procurement Organizations (OPOs), and submitted to the OPTN Contractor. These records are used for matching transplant candidates on the national waiting list to donated deceased organs. The OPTN maintains a record of match runs and data requests. UNOS also maintains information relative to each disclosure for all areas as described in 10a. The OPTN contractor provides HRSA with a quarterly disclosures report.
PIA 33:	Is the submission of PII by individuals voluntary or mandatory as defined in the Privacy Act?	Mandatory

PIA 33A:

If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.

42 CFR §121.5 states in part, "Transplant hospitals shall assure that individuals are placed on the national list as soon as they are determined to be candidates for transplantation. The OPTN shall advise transplant hospitals of the information needed for such listing." In order for any hospital to retrieve or transplant any deceased organs in the US, the hospital must be an active member of the OPTN and must comply with OPTN policies. Accordingly, a patient must be in the national list to be a candidate for transplantation. The Secretary has determined that data submitted to the OPTN by organ procurement organizations and transplant hospitals are considered mandatory under 42 CFR §121.11(b)(2). Failure of an OPO or transplant hospital to submit the data accurately and completely could be a violation of this section of the OPTN final rule. An OPO or transplant hospital participating in Medicare or Medicaid could be considered in violation of Section 1138 of the Social Security Act of the Secretary found that it did not provide information to the OPTN as required specifically by §121.11(b)(2). The OPTN is required by law to maintain records on all transplant candidates, all organ donors, and all transplant recipients. These records are transmitted to the OPTN by OPTN member institutions. The information is taken from medical records. It is used to correlate those needing organs with donor organs as they become available based on strict guidelines. The UNet System is accessed by authorized employees of the OPTN member institutions. Consent and notification of collection of data are performed by the member institutions who have direct contact with the individuals on whom PII is being collected.

PIA 34:

Describe the method in place to notify and obtain consent from individuals whose PII will be collected. If no prior notice is given or consent cannot be obtained, explain why.

OPTN Members, not the OPTN Contractor, obtain consent and/or provide notice. The OPTN, has been designated as a "public health authority" for the purposes of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) regulation, "Standards for Privacy of Individual Identifiable Health Information" (Privacy Rule), 45 CFR Parts 160 and 164. Under 45 CFR 164.512, a "covered entity" may disclose an individual's protected health information without the individual's written consent or authorization when such a disclosure is made to a "public health authority" that is authorized by law to collect information for the purpose of preventing or controlling disease, injury, or disability. Given the legal authority and mandate of the OPTN, it has been determined that a "covered entity" may disclose certain individually identifiable health information to the OPTN without written consent or authorization of the individual, when the disclosure furthers the OPTN's statutory purposes and functions.

PIA 35:	Describe the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of original collection). If they cannot be notified or have their consent obtained, explain why.	OPTN Members, not the OPTN Contractor, obtain consent and/or provide notice as required by OPTN policies. The OPTN Computer System is not accessed by the individuals on whom PII is collected, used, or disclosed. If they cannot be notified or have their consent obtained, explain why. The OPTN Contractor does not have direct contact with the individuals, nor does the OPTN Contractor have contact information (i.e. addresses, phone numbers, etc.) to make contact with the individuals whom records reside in the OPTN Computer System.
PIA 36:	Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate. If no process exists, explain why not.	Individuals may seek to amend a record about them by submitting a written request to the OPTN contractor or SRTR contractor identified in the "System Manager(s)" section of the SORN at the email address provided in that section, with a copy to the HRSA Division of Transplantation at the email address indicated, containing the same information required for an access request. The request must include verification of the requester's identity in the same manner required for an access request and must reasonably identify the relevant record, specify the information being contested and the corrective action sought, and include reasons for requesting the correction, along with supporting documentation, to show how the record is inaccurate, incomplete, untimely, or irrelevant. Additionally, OPTN Members are required to ensure the accuracy of the information provided to the OPTN pursuant to OPTN Policies, and may request and make modifications to correct the record and/or address the concerns of their patients.
PIA 37:	Describe the process in place for periodic reviews of the system to ensure the integrity, availability, accuracy, and relevancy of the PII in the system. Please address each element in your response. If no processes are in place, explain why not.	PII input of date of birth and SSN into the UNet system is validated on input as it requires dual entry (the information must be input twice). The OPTN Members who are entering patient data are responsible for the integrity of the data pursuant to OPTN policies. Data is routinely audited for data integrity and compliance with OPTN policies, and relevance by the OPTN Contractors Member Quality Department as required of the OPTN contract. SSN is also used to check for duplicate patient data in the system. Additionally, data reports are made available to OPTN Members to aid in the review of data submission activities.
PIA 38:	Identify who will have access to the PII in the system.	<ul style="list-style-type: none"> Users Administrators Developers Contractors Others
PIA 38A:	Select the type of contractor.	Third-Party Contractor (Contractors other than HHS Direct Contractors)

PIA 38B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
PIA 38C:	Identify the additional person(s) who will have access to the PII in the system not mentioned in the list above.	HRSA Automated Information System (AIS) Systems Security Officer.
PIA 39:	Provide the reason why each of the groups identified in 38 needs access to PII.	<p>(1) Users -End-user use of data. Internal Quality Assurance (QA) data audits. IT System Administration Programming and development. Statistical analysis);</p> <p>(2) Administrators - End-user use of data. Internal QA data audits. IT System Administration Programming and development. Statistical analysis.</p> <p>(3) Developers- End-user use of data. Internal QA data audits. IT System Administration Programming and development. Statistical analysis;</p> <p>(4) Contractors - End-user use of data. Internal QA data audits. IT System Administration Programming and development. Statistical analysis</p>
PIA 40:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	<p>Authorized system users can only access information they have been granted access based on their roles and responsibilities and security groups established and administered in the federated model used by the OPTN. As part of the model, Security Site Administrators are responsible for ensuring that authorized users are in the appropriate roles and security groups and follow OPTN policies relating to system access.</p> <p>Additionally, the OPTN Contractor conducts quarterly system audits and business reviews to ensure the system and data are safeguarded pursuant to the OPTN contract. Physical and logical access controls are also in place.</p>
PIA 41:	Describe the technical methods in place to allow those with access to PII to access only the minimum amount of information necessary to perform their job.	System and Data access are restricted through role-based access controls. Each OPTN Member (OPO, Transplant Hospital, or Histocompatibility Lab) can only view donor, candidate or recipient data they have been granted access to. Each OPTN Member has authorized site security administrator who assigns and reviews system access. The OPTN Contractor limits physical and logical access to the production environments to staff, using Active Directory based authentication.
PIA 42:	Identify the general security and privacy awareness training provided to system users (system owners, managers, operators, contractors and/or program managers) to make them aware of their responsibilities for protecting the information being collected and maintained.	All Authorized system users are required to take a UNet Security Training as a condition of access to the system, read and acknowledge the System Terms of Use annually. Additionally, Site System Administrators are required to take additional training and are required to acknowledge their roles and responsibilities. Additionally, the OPTN Contractor receives mandatory Privacy and Security Awareness training. This includes the review of privacy and security standards and policies acknowledgment.

PIA 43:

Describe the training system users receive above and beyond general security and privacy awareness training.

The OPTN Contractor Elevated Access training is also provided to all staff in privileged access roles, however, there are additional requirements that are outlined in OPTN Member Security Policies, that help to achieve additional security and privacy safeguards as implemented. This can serve as additional education and awareness on the importance of safeguarding the OPTN Computer System and Data.

PIA 44:

Describe the process and guidelines in place for the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).

Pursuant to the SORN, the records are currently unclassified and retained indefinitely pending completion of a disposition schedule approved by the National Archives and Records Administration (NARA).

PIA 45:

Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.

To protect PII, UNOS uses a three-tiered system (1) the top layer is a web browser (examples include Microsoft's Internet Explorer or Google's Chrome) using TLS technology encryption to protect the data in transit. (2) layer two, or the middle layers, are the web servers. The OPTN Contractor uses multiple web servers and multiple, geographically dispersed operating environments. (3) The third and final layer is the data layer which includes application servers and SQL database servers where The OPTN Contractor uses Microsoft's Clustering software for the SQL servers. All official OPTN data is encrypted at rest at both the database level, using industry standard strong encryption algorithms, as well as in the Nutanix hyper-converged environment where the storage is encrypted. These operating environments are located within a highly secured, industry leading, co-location facilities. The OPTN contractor (developers of the system) has access agreements in place defining system security policies and rules of behavior for both internal staff as well as site administrators and users of the system. Internal staff who have access to the system and the data are required to pass pre-employment verification, background investigations, including criminal history, and other prerequisites prior to being provided access to the facility as well as systems. Site Security Administrators are required to review access for their users on an annual basis. The OPTN Contractor uses a Defense-in-Depth and Zero Trust hybrid model to secure the environment. This includes, but is not limited to, vulnerability management, anti-malware protection, access management, code scanning, penetration testing, intrusion detection and prevention, etc. The OPTN contractor also employs an electronic security system and 24 X 7 security guards that monitor door access and people movement. Physical access points to sensitive facilities, or restricted areas housing information systems that process or display information are controlled during working hours and guarded or locked during nonworking hours. Each employee, contractor, temporary employee, consultant, or contractor is issued a security badge. Each person must scan his or her badge to the electronic reader before entering a controlled door on the OPTN contractor's premises. Access to systems at the co-location facilities requires individuals to be on an approved access list, have a badge as well as specific access to the cage where the systems are housed.

Review and Comments

OpDiv Privacy Analyst Review

Privacy Analyst Review Decision:	Approved	Privacy Analyst Review Date:	1/8/2026
Privacy Analyst Review Comments:	PTA 2A >> spell out AI upon first use PTA 8A >> https://portal.unos.org - Bad Request - Invalid Hostname, is this URL still valid? PIA 30A >> Spell out CMS upon first use PIA 31A >> Organ Procurement and Transplantation Network Application Form (Membership) (OMB number 0915-0184, expiration date: 12/31/2025) - Is this being renewed? PIA 36 >> spell out SORB upon first use PIA 39 >> spell out QA upon first use	# of Days - PA Review:	0

SOP Review

SOP Review Decision:	Approved	SOP Review Date:	1/8/2026
SOP Review Comments:		# of Days - SOP Review:	0

Agency Privacy Analyst Review

Agency Privacy Analyst Review Decision:	Approved	Agency Privacy Analyst Review Date:	1/9/2026
Agency Privacy Analyst Review Comments:	<p>Reviewer: Nestor Villafuerte</p> <p>1/9/2026 All comments have been addressed and AI Review completed. This PIA is ready for SAOP review and approval.</p> <p>12/12/2025 Please see the following comments and update accordingly:</p> <p>PTA-2A: PTA-2A doesn't mention the addition of AI as a system change.</p> <p>PTA-4: Please elaborate on this use case "<i>The system uses AI functionality with Predictive Analytics to increase offer acceptance and kidney utilization, to better support the systems functionality.</i>" Which system are they referring to? Specifically, what type of data will AI process?</p> <p>11/17/2025 Please see the following comments and update accordingly:</p> <p>PTA-4:</p> <p>Per PTA-21, please describe to the best of your ability privacy risks."</p> <p>PTA-21A: Please add the following statement in your response:</p> <p>"The Privacy Impact Assessment (PIA) will be updated to reflect any future AI use cases that introduce new privacy risks."</p>	# of Days - APA Review:	1

SAOP Review

SAOP Review Decision:	Approved	SAOP Review Date:	1/14/2026
SAOP Review Comments:		# of Days - SAOP Review:	5

SAOP Signature

Date	User	Type	Name	Original Value	New Value
1/14/2026 4:25 PM	BAUR, VANESSA	Signature	SAOP (Email PIN)		Content Signed

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments				
Question Name	Submitter	Date	Comment	Attachment
PTA 08B	Data Feed Service, pta_pia_HRSA_Release	7/8/2025	https://portal.unos.org .	
PTA 21A	VILLAFUERTE, NESTOR	10/22/2025	Please add the following statement in your response: "The Privacy Impact Assessment (PIA) will be updated to reflect any future AI use cases that introduce new privacy risks."	
PTA 04	BLAND, CRYSTAL	11/17/2025	Per PTA-21, please describe to the best of your ability any known AI use cases. Also please include the following AI Statement "The Privacy Impact Assessment (PIA) will be updated to reflect any future AI use cases that introduce new privacy risks."	
PTA 01	BLAND, CRYSTAL	11/17/2025	11/17/2025 Email from HRSA on 10/20/2025 regarding the E.O. 14168.	10-20-2025 EMAIL_OPTN_RE_EO requirement_PIA's.pdf
PTA 04	BLAND, CRYSTAL	12/12/2025	Please elaborate on this use case " <i>The system uses AI functionality with Predictive Analytics to increase offer acceptance and kidney utilization, to better support the systems functionality.</i> " Which system are they referring to? Specifically, what type of data will AI process?	12-11-2025 HRSA OPTN PIA_RE_AI PIA Review.pdf
PTA 02A	BLAND, CRYSTAL	12/12/2025	PTA-2A doesn't mention the addition of AI as a system change.	
PTA 04	BLAND, CRYSTAL	1/9/2026	1/9/2025 AI Review Completed.	1-9-2026 EMAIL_RE_AI PIA Review_HRSA1445982.pdf