PTA / PIA: HRSA - SRTR - QTR3 - 2025 - HRSA1446038

Created Date: 10/20/2025 12:23 PM Last Updated: 3/27/2026 4:23 PM

General Information

PTA / PIA Name:	HRSA - SRTR - QTR3 - 2025 - HRSA1446038	**PTA / PIA ID:**	3924303
Component Name:	HRSA - Scientific Registry of Transplant Recipients	**ATO Boundary Name:**	Scientific Registry of Transplant Recipients
Overall Status:	Complete	**# of Days - Open:**	269
Submitter:		**Submit Date:**	3/12/2026
Next Assessment Date:	03/26/2029	**Expiration Date:**	3/26/2029
Office:		**OpDiv:**	HRSA
Security Categorization:	Moderate		
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.	7/22/2024
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	Reginald Ralph
PTA 01A:	POC Title and Organization	ISSO (HRSA)
PTA 01B:	POC Email Address	rralph@hrsa.gov
PTA 01C:	POC Phone Number	N/A
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.	None
PTA 03:	Is the data contained in the system owned by the agency or contractor?	Contractor

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 Scientific Registry of Transplant Recipients (SRTR) is a national database related to solid organ transplantation of kidney, liver, pancreas, intestine, heart, lung, and vascularized composite allograft (VCA). The registry covers the full range of transplant activity, from organ donation and waiting list candidates to transplant recipients. Data in the registry are provided monthly by the Organ Procurement and Transplantation Network (OPTN) (under a separate PIA). Data are submitted by OPTN members including transplant centers, histocompatibility labs, and Organ Procurement Organizations (OPOs) through the OPTN. The SRTR provides advanced statistical and epidemiological analyses related to organ allocation and transplantation in the United States to the OPTN, the HHS Secretary's Advisory Committee on Organ Transplantation (ACOT), and HHS/HRSA/ DoT. The Living Donor Collective is a pilot program operated under the SRTR contract. The program aims to collect information about potential living donors who are assessed for kidney or partial liver donation. Data in the collective are gathered from potential living donors at the time of first assessment for living donation.

PTA 05:	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.	The information received by the SRTR from the OPTN includes demographic information, pre- and post-transplant clinical information of patients on the national waiting lists and living organ donors, histocompatibility information on donated organs, and records of match runs between donated organs and potential transplant patients. The information includes SSN, first and last names, state of permanent residence for patients, zip code, ethnicity and race, sex, date of birth, citizenship, highest education level, source of payment, blood type and detailed medical information. The living donor contact information includes street addresses. The Living Donor Collective information includes SSN, first and last names, state of permanent residence for patients, zip code, street address, phone number, email, ethnicity and race, sex, date of birth, citizenship, highest education level, blood type and detailed medical information Additional data sources such as End Stage Renal Disease (ESRD) data from Centers for Medicare and Medicaid Services (CMS) and Limited Access Death Master File (LADMF) from National Technical Information Service (NTIS) are also acquired to supplement ESRD and death ascertainment of wait-listed candidates, transplant recipients, and living donors. Information received from the OPTN includes personnel contact information from their member organizations (transplant center, OPO and histocompatibility laboratory). Information includes contact information for the persons that complete all the transplant and donor forms in the OPTN system. Contact information includes first and last names, phone numbers, email addresses, and institution designation. OPTN also collects the physician and surgeon name and the national provider identification numbers (NPI#) for the providers that perform the transplants. The general public can email or telephone SRTR support staff for assistance on understanding the information on the SRTR website, the reports on the website, or to make data requests. SRTR keeps a log of requester's names and email or phone numbers for quality assurance purposes. SRTR stores this logged information in an Access database on our network. No other private information is collected from public inquiries. The SRTR system does not collect any information about SRTR investigators and staff in order to control the system access. The system access is managed by Microsoft Active Directory.
PTA 05A:	Are user credentials used to access the system?	Yes
PTA 05B:	Please identify the type of user credentials used to access the system.	Non-HHS User Credentials Username Password
PTA 06:	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.	Data in the registry are collected by the Organ Procurement and Transplantation Network (OPTN) as part of the National Organ Transplantation Act of 1984 (1984 Pub.L. 98507) and the OPTN Final

Rule (42 CFR Part 121). Data are collected from OPTN members including transplant centers, OPOs and histocompatibility laboratories across the country. Data are collected along the full continuum of transplant activity, from organ donation, patients registering on the national waiting list, patients receiving transplants and long term post-transplant follow-up. Information is submitted by medical personnel at organ transplantation institutions. Submission of this information to the OPTN is mandatory for OPTN members. The information is collected through the OPTN web-based data collection systems. The information entered into OPTN data systems is to prioritize patients for organ allocation, match transplant candidates to organ donors and electronically notify transplant programs of available compatible organs. The information received by the SRTR from the OPTN includes demographic information, pre and post-transplant clinical information of patients on the national waiting lists and living organ donors, histocompatibility information on donated organs, and records of match runs between donated organs and potential transplant patients. The information includes SSN, first and last names, state of permanent residence for patients, zip code, ethnicity and race, sex, date of birth, citizenship, highest education level, source of payment, blood type and detailed medical information. The living donor contact information includes street addresses. The Living Donor Collective information includes SSN, first and last names, state of permanent residence for patients, zip code, street address, phone number, email, ethnicity and race, sex, date of birth, citizenship, highest education level, blood type and detailed medical information Additional data sources such as End Stage Renal Disease (ESRD) data from Centers for Medicare and Medicaid Services (CMS) and Limited Access Death Master File (LADMF) from National Technical Information Service (NTIS) are also acquired to supplement ESRD and death ascertainment of wait-listed candidates, transplant recipients, and living donors. Information received from the OPTN includes personnel contact information from their member organizations (transplant center, OPO and histocompatibility laboratory). Information includes contact information for the persons that complete all the transplant and donor forms in the OPTN system. Contact information includes first and last names, phone numbers, email addresses, and institution designation. OPTN also collects the physician and surgeon name and the national provider identification numbers (NPI#) for the providers that perform the transplants. The SRTR adopts a standard production system that incorporates a variety of processes and tools to produce consistent, high quality analytical data sets Standard Analysis Files (SAFs). There are internal and external (i.e. public) SAFs being generated each month after the completion of SRTR monthly data update cycle. Public SAFs are available for external users for

		independent researches while the internal SAFs are restricted to SRTR investigators and staff. The SRTR maintains the data collected by the OPTN in order to perform the tasks required in the SRTR contract. members. The information is collected through the OPTN web-based data collection systems. The information entered into OPTN data systems is to prioritize patients for organ allocation, match transplant candidates to organ donors and electronically notify transplant programs of available compatible organs. The information received by the SRTR from the OPTN includes demographic information, pre and post-transplant clinical information of patients on the national waiting lists and living organ donors, histocompatibility information on donated organs, and records of match runs between donated organs and potential transplant patients. The information includes SSN, first and last names, state of permanent residence for patients, zip code, ethnicity and race, sex, date of birth, citizenship, highest education level, source of payment, blood type and detailed medical information. The living donor contact information includes street addresses. The Living Donor Collective information includes SSN, first and last names, state of permanent residence for patients, zip code, street address, phone number, email, ethnicity and race, gender, date of birth, citizenship, highest education level, blood type and detailed medical information Additional data sources such as End Stage Renal Disease (ESRD) data from Centers for Medicare and Medicaid Services (CMS) and Limited Access Death Master File (LADMF) from National Technical Information Service (NTIS) are also acquired to supplement ESRD and death ascertainment of wait-listed candidates, transplant recipients, and living donors. Information received from the OPTN includes personnel contact information from their member organizations (transplant center, OPO and histocompatibility laboratory). Information includes contact information for the persons that complete all the transplant and donor forms in the OPTN system. Contact information includes first and last names, phone numbers, email addresses, and institution designation. OPTN also collects the physician and surgeon name and the national provider identification numbers (NPI#) for the providers that perform the transplants. The SRTR adopts a standard production system that incorporates a variety of processes and tools to produce consistent, high quality analytical data sets Standard Analysis Files (SAFs). There are internal and external (i.e. public) SAFs being generated each month after the completion of SRTR monthly data update cycle. Public SAFs are available for external users for independent researches while the internal SAFs are restricted to SRTR investigators and staff. The SRTR maintains the data collected by the OPTN in order to perform the tasks required in the SRTR contract.
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://www.srtr.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.	Purpose: The site hosts the public reporting on transplant center and organ procurement organization performance metrics as well as various tools and web applications for researchers. No PII is hosted on this site. Access: Publicly available URL with public read-only access. Access Authentication: None for generic users. This is a wholly public site with no authentication needed to interact. User Traffic Count: Apprx 14k public users per month https://www.srtr.transplant.hrsa.gov Purpose: This site hosts the official Annual Data Report for the SRTR. No PII is hosted on this site. Access: Publicly available URL with public read-only access. Access Authentication: None for generic users. This is a wholly public site with no authentication needed to interact. User Traffic Count: Apprx 1k public users per month https://www.securesrtr.transplant.hrsa.gov Purpose: This site hosts program specific information. Transplant centers and OPOs use this site to review draft reports, preview reports, CUSUM metrics, and to submit official comments back to the SRTR. No PII is hosted on this site. Access: Publicly available URL with an authentication login for each program/staff. Access Authentication: Access is controlled by username/password authentication. Each program/OPO has a defined administrator (as defined by OPTN registry). That administrator has abbreviated permissions to create center users, add organ specific permissions, and reset passwords. SRTR staff maintain full admin privileges to create and maintain users including Center Admin users, as well as delete user accts as needed. User Traffic Count: Apprx 800 authenticated users per month Active User Acct Count: 2101 Users for 374 programs https://www.livingdonorcollective.org Purpose: This site hosts information about the Living Donor program, as well as patient centered information around living donation. No PII is hosted on this site. Access: Publicly available URL with public read-only access. Access Authentication: None for generic users. This is a wholly public site with no authentication needed to interact. User Traffic Count: Apprx 100 public users per

		month https://www.portal.livingdonorcollective.org Purpose: This site hosts the living donor collective data entry portal. The site is used to collect PII from potential living donor candidates and is used in program study, follow up, and person matching with OPTN and other data stores. Access: Publicly available URL with an authentication login for each program/staff. Access Authentication: Access is controlled by username/password authentication and controlled by SRTR administration. User Traffic Count: Apprx <10 authenticated users per month Active User Acct Count: 73 Users for 10 programs
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?	Yes
PTA 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	Yes
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?	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?	No

Privacy Impact Assessment

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 Biographical Information Name Date of Birth Employment Status/History Contact Information Email Address (Personal) Phone Numbers (Personal) Mailing Address (Business) Medical Information Medical Records Medical Records Number Other Other

PIA 22A:	Identify the “other” type(s) of personally identifiable information (PII) not mentioned in the above list.	National Provider Identification Number Institution Designation Ethnicity and Race Sex Citizenship Source of Payment Mailing address (personal) >> (state of permanent residence for patients, zip code) Biometric identifier >>(blood type) Education records >> (highest education level)
PIA 23:	Indicate the categories of individuals about whom PII is collected, maintained, or shared.	Patients Members of the public
PIA 24:	Indicate the approximate number of individuals whose PII is maintained in the system.	500 – 4,999
PIA 25:	For what primary purpose is the PII used?	Data with identifiers may be provided to other researchers with approval of an Institutional Review Board, the OPTN/SRTR Patient Protection Group (PPG), the HRSA Contracting Officer's Representative (COR), and after execution of a data use agreement (DUA) with SRTR contractor. Data are shared with CMS contractor under the following agreements: HRSA-CMS agreements Healthcare Systems Bureau (HSB), HSB#06-03-06-00 and CMS Data Usage Agreement (DUA), DUA#21764. Data gathered through the Living Donor Collective will be used for future patient follow up. Individuals involved in the pilot program will be tracked and communicated with on a regular basis following their decision to donate or to not donate.
PIA 26:	Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).	PII are used in patient linkage with United States Renal Data System (USRDS) ESRD data system to ascertain ESRD first service date and dialysis start date information of waitlist candidates and transplant recipients. PII are used in patient linkage with LADMF from NTIS for death ascertainment. PII are used in linkages associated with the Transplant Cancer Match Study support under the SRTR contract as well as linkages with various other approved external research efforts.

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-state 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 CFR 121 provides the SRTR the authority to collect data on donors, recipients, and transplant candidates as directed by the Secretary.
PIA 28:	Identify legal authorities, governing information use and disclosure specific to the system and program.	PII are used in patient linkage with United States Renal Data System (USRDS) ESRD data system to ascertain ESRD first service date and dialysis start date information of waitlist candidates and transplant recipients. PII are used in patient linkage with LADMF from NTIS for death ascertainment. PII are used in linkages associated with the Transplant Cancer Match Study support under the SRTR contract as well as linkages with various other approved external research efforts.
PIA 29:	Are records in the system retrieved by one or more PII data elements?	No
PIA 30:	Identify the sources of PII in the system.	Government Sources Within the OPDIV Other HHS OPDIV Other Federal Entities Non-Government Sources Private Sector
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).	LDC OMB approval is 0906-0034, Expiration 04/30/2027
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.	Other Federal Agency/Agencies Private Sector Within HHS
PIA 32B:	For each disclosure, name the organizations/systems the system shares PII with and the purpose(s) of the disclosure.	The SRTR provides advanced statistical and epidemiological analyses related to organ allocation and transplantation in the United States to the OPTN, the HHS Secretary's Advisory Committee on Organ Transplantation (ACOT), and HHS/HRSA/ DoT.
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)).	MOUs with National Organ Procurement and Transplantation Network and Centers for Medicare and Medicaid Services (CMS).

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.	Data in the registry are collected by the Organ Procurement and Transplantation Network (OPTN) as part of the National Organ Transplantation Act of 1984 (1984 Pub.L. 98–507) and the OPTN Final Rule (42 CFR Part 121). Data are collected from OPTN members including transplant centers, OPOs and histocompatibility laboratories across the country. Data are collected along the full continuum of transplant activity, from organ donation, patients registering on the national waiting list, patients receiving transplants and long term post-transplant follow-up. Information is submitted by medical personnel at organ transplantation institutions. Submission of this information to the OPTN is mandatory for OPTN members. The information is collected through the OPTN web-based data collection systems. The information entered into OPTN data systems is to prioritize patients for organ allocation, match transplant candidates to organ donors and electronically notify transplant programs of available compatible organs. Monthly exports of OPTN data are sent to SRTR via encrypted transfer.
PIA 33:	Is the submission of PII by individuals voluntary or mandatory as defined in the Privacy Act?	Voluntary

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.	All PII data are provided by OPTN via monthly database update process. 42 CFR 121.5 stipulates 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 on the national list to be a candidate for transplantation. 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. For both OPTN/SRTR and Living Donor Collective; consent, notifications, collection or opt out methods are performed by the member institutions of OPTN, who have direct contact with the individuals on whom PII is collected. However, the System of Records Notice (SORN) for OPTN/SRTR/Division of Transplantation Research Information System (DTRIS) is reviewed annually and updated as applicable (and published in the Federal Register) to reflect any proposed changes to the system and the data that it contains. Living donor candidates being evaluated at participating programs will not be able to opt out of participation in the LDC. Per the "public health authority" exception (45 CFR 164.512(b)) granted to the SRTR by HRSA, transplant hospitals are exempt from obtaining prior authorization to disclose PHI under the Health Insurance Portability and Accountability Act Privacy Rule (45 CFR Parts 160 and 164). The SRTR collects basic contact information (name, mailing address, telephone number, email address) from data requestors. Allowing the contractor to respond to email queries is the sole purpose for collecting the basic contact information they gather. Consequently, there's no process for notifying users or obtaining consent for changing data uses. The SRTR Web site privacy policy describes in detail how the information will be used, shared, and how users can modify it. Please see https://www.hhs.gov/web/policies-and-standards/hhs-web-policies/privacy/index.html SRTR does not collect PII unless an individual chooses to have the contractor respond to their query. In this case consent is implicit.

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.	The OPTN data in the SRTR System as well as the Living Donor Collective cannot be accessed by individuals on whom PII is collected. OPTN member institutions and LDC pilot sites have access to their own data, accessed by specified employees. The OPTN member institutions, not the OPTN contractor or the SRTR contractor, obtain consent and notify the individuals how their PII is to be used. The System of Records for the OPTN/SRTR/DTRIS is reviewed annually by HRSA. Any alteration or proposed change to the routine use of OPTN data is published in the Federal Register Notice. The SRTR responds to email inquiries for data requests. The SRTR collects basic contact information (name, mailing address, telephone number, email address) from data requestors. Responding to email queries and getting contact information in order to send the data to the data requestors is the only reason SRTR collects basic contact information from data requestors. The data requestor notifies SRTR if their contact information changes at the time they want to renew their data request agreement with the SRTR. Data request contact information is kept separately from the SRTR data. Consequently, there's no process for notifying data requestors or obtaining consent. The SRTR Web site privacy policy describes in detail how the contact information will be used (for the data use agreement). Please see https://www.hhs.gov/web/policies-and-standards/hhs-web-policies/privacy/index.html SRTR does not collect any PII information from the data requestors, unless an individual provides their contact information in order to allow the contractor respond to their query.
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.	People who have a complaint can email and/or call the SRTR hotline to file a complaint. It is the responsibility of the OPTN member institutions to ensure the accuracy and appropriateness of the information entered in both the OPTN/SRTR and Living Donor Collective systems. In the event of a disclosure of information residing in either system, the OPTN contractor would notify the specific OPTN member institutions impacted, and those institutions would, in turn, notify the individuals impacted.

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.	OPTN data are routinely audited for data integrity, field compliance, and relevance by the Data Quality group of the OPTN contractor. SRTR contractor is required under the contract with HRSA to implement procedures to evaluate the quality of OPTN data and provides a monthly data quality report to the OPTN contractor, including checking the accuracy of PII and identified inaccurate PII in the monthly quality report to OPTN contractor. The information provided by the OPTN is not destroyed, removed, or changed from the system when it is loaded into SRTR data system. Once the data is loaded, the data is locked down (set to read-only mode) so that the system data cannot be altered. We restrict access to the PII data to only those individuals that only need access to this information and have the appropriate Public Trust clearance. These individuals include the system administrators, the system owner, database administrators, bio statisticians, and developers. We follow standard role-based security methodologies which limit the number and type of people who have access to the system. Backups of the data are regularly maintained and copies are replicated off site in the event of a disaster.
PIA 38:	Identify who will have access to the PII in the system.	Users Administrators Developers
PIA 39:	Provide the reason why each of the groups identified in 38 needs access to PII.	(1) Users -End-user use of data. Internal QA data audits. IT System Administration Programming and development. Statistical analysis). (2) Administrators - End-user use of data. Internal QA data audits. IT System Administration Programming and development. Statistical analysis. (3) Developers- End-user use of data. Internal QA data audits. IT System Administration Programming and development. Statistical analysis.
PIA 40:	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	The SRTR System Owner and the Program Manager from SRTR determine the appropriate PII access permission levels of respective SRTR staff and communicates to system administrators to implement these system access privileges.
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.	SRTR uses Microsoft Windows Active Directory to manage user PII access permissions necessary to perform their job.
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.	Upon the first day of employment, staff are required to sign a confidentiality agreement form to acknowledge and protect patient PII data. SRTR staff are also required to complete annual HHS Privacy Awareness Training and Information Systems Security Awareness Training.

PIA 43:	Describe the training system users receive above and beyond general security and privacy awareness training.	In addition, all staff are require to take Collaborative Institutional Training Initiative (CITI) security training every three years.
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).	From SRTR Agreement for Release of Data, Clause 10: One year from the start of the project, it shall complete a Request for Renewal Form. This form shall be completed annually until it no longer requires the use of the data. At that time, it shall return the data, or shall certify in writing the deletion and destruction of all copies of the data and all authorized work product derived from the data, including from all archival and backup copies of electronic storage media, unless the recipient has presented adequate justification of a research or health nature for retaining such information. The records are currently unscheduled 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.	All SRTR and Living Donor Collective data are maintained on an on-prem cloud system without external interconnections to other systems. Data are received from the OPTN monthly. These data reside on a server with no outside access and access limited to authorized SRTR personnel. The server is logically isolated from the Internet via firewalls and other configured controls. It does not receive or transfer data via the Internet. The server is physically protected from the outside by three locked doors, access is limited to authorized personnel only, and the machine itself is locked and in a locked computer rack. The SRTR contractor receives the password protected data from the OPTN contractor via encrypted download on a monthly basis.

Review and Comments

OpDiv Privacy Analyst Review

Privacy Analyst Review Decision:	Approved	**Privacy Analyst Review Date:**	3/24/2026
Privacy Analyst Review Comments:	Missing from PIA-22 that was included in the PTA-5 response: mailing address (personal) >> (state of permanent residence for patients, zip code) biometric identifier >>(blood type) education records >> (highest education level)	**# of Days - PA Review:**	12

SOP Review

SOP Review Decision:	Approved	**SOP Review Date:**	3/24/2026
SOP Review Comments:		**# of Days - SOP Review:**	0

Agency Privacy Analyst Review

Agency Privacy Analyst Review Decision:	Approved	**Agency Privacy Analyst Review Date:**	3/25/2026
Agency Privacy Analyst Review Comments:	Reviewer: Crystal Bland 3/25/2026 All comment were addressed, however in PTA-5 the term "gender" is still listed even though it was replace with the term "sex". We will remove the term "gender" during the 508 process. This PIA is ready for SAOP review and approval. 3/12/2026 Please see comment and update accordingly: PTA-5 and PTA-6: Please remove the word "gender" from the response per E.O. 14168. Reviewer: Nestor Villafuerte 12/12/2025 Please see the following comments and update accordingly: PTA-5: Please replace "Gender" to "Sex" per E.O. 14168. PTA-6: Please replace "Gender" to "Sex" PIA-22A: Please replace "Gender" to "Sex" PIA-31A: Per reginfo.gov, please add the expiration date 04/30/2027 PIA-44: Is there a specific NARA retention schedule you can cite?	**# of Days - APA Review:**	1

SAOP Review

SAOP Review Decision:	Approved	**SAOP Review Date:**	3/27/2026
SAOP Review Comments:		**# of Days - SAOP Review:**	2

SAOP Signature

Date	User	Type	Name	Original Value	New Value
3/27/2026 1:41 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 06	VILLAFUERTE, NESTOR	10/22/2025	Please replace "Gender" to "Sex"	
PIA 22A	VILLAFUERTE, NESTOR	10/22/2025	Please replace "Gender' to "Sex".	
PIA 31A	VILLAFUERTE, NESTOR	10/22/2025	Per reginfo.gov, please add the expiration date 04/30/2027	
PTA 05	BLAND, CRYSTAL	12/12/2025	Please replace "Gender" to "Sex" per E.O. 14168.	
PIA 44	BLAND, CRYSTAL	12/12/2025	Is there a specific NARA retention schedule you can cite?	