

Manufacturer Disclosure Statement for Medical Device Security -- MDS2

ImageView Version 1.0 Build 1.10

Carestream DRX-Revolution

Carestream DRX-Evolution

Carestream DRX-Evolution Plus

Carestream DRX-Revolution Nano

Carestream DRX-Ascend

Carestream DRX In-room

Carestream DRX-Transportable / Lite

Carestream DRX-Mobile

Carestream Health, Inc Carestream DRX-Compass & DR-Fit

AL8848

15-Aug-2021

Question ID	Question	See note
DOC-1	Manufacturer Name	Carestream Health, Inc. —
DOC-2	Device Description	X-Ray Imaging Systems —
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		Carestream DRX-Evolution
		Carestream DRX-Evolution Plus
		Carestream DRX-Revolution Nano
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		Carestream DRX In-room
		Carestream DRX-Transportable / Lite
		Carestream DRX-Mobile
DOC-3	Device Model	Carestream DRX-Compass & DR-Fit —
DOC-4	Document ID	AL8848 —
		1-800-328-2910
DOC-5	Manufacturer Contact Information	health.imaging.tsc@carestreamhealth.com —
		X-Ray Imaging System
DOC-6	Intended use of device in network-connected environment:	—
DOC-7	Document Release Date	8/15/2021 —
DOC-8	Coordinated Vulnerability Disclosure: Does the manufacturer have a vulnerability disclosure program for this device?	Yes —
DOC-9	ISAO: Is the manufacturer part of an Information Sharing and Analysis Organization?	Yes —
DOC-10	Diagram: Is a network or data flow diagram available that indicates connections to other system components or expected external resources?	Yes —
DOC-11	SaMD: Is the device Software as a Medical Device (i.e. software-only, no hardware)?	No —
DOC-11.1	Does the SaMD contain an operating system?	N/A —
DOC-11.2	Does the SaMD rely on an owner/operator provided operating system?	N/A —
DOC-11.3	Is the SaMD hosted by the manufacturer?	N/A —
DOC-11.4	Is the SaMD hosted by the customer?	N/A —

MANAGEMENT OF PERSONALLY IDENTIFIABLE INFORMATION

Can this device display, transmit, store, or modify personally identifiable information (e.g. electronic Protected Health Information (ePHI))?

MPII-1	Can this device display, transmit, store, or modify personally identifiable information (e.g. electronic Protected Health Information (ePHI))?	Yes —
MPII-2	Does the device maintain personally identifiable information?	Yes
MPII-2.1	Does the device maintain personally identifiable information temporarily in volatile memory (i.e., until cleared by power-off or reset)?	Yes —
MPII-2.2	Does the device store personally identifiable information persistently on internal media?	Yes —
MPII-2.3	Is personally identifiable information preserved in the device's non-volatile memory until explicitly erased?	Yes —
MPII-2.4	Does the device store personally identifiable information in a database?	Yes —

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MPII-2.5	Does the device allow configuration to automatically delete local personally identifiable information after it is stored to a long term solution?	Yes	—
MPII-2.6	Does the device import/export personally identifiable information with other systems (e.g., a wearable monitoring device might export personally identifiable information to a server)?	Yes	—
MPII-2.7	Does the device maintain personally identifiable information when powered off, or during power service interruptions?	Yes	—
MPII-2.8	Does the device allow the internal media to be removed by a service technician (e.g., for separate destruction or customer retention)?	Yes	—
MPII-2.9	Does the device allow personally identifiable information records be stored in a separate location from the device's operating system (i.e. secondary internal drive, alternate drive partition, or remote storage location)?	No	—
MPII-3	Does the device have mechanisms used for the transmitting, importing/exporting of personally identifiable information?	Yes	—
MPII-3.1	Does the device display personally identifiable information (e.g., video display, etc.)?	Yes	—
MPII-3.2	Does the device generate hardcopy reports or images containing personally identifiable information?	No	—
MPII-3.3	Does the device retrieve personally identifiable information from or record personally identifiable information to removable media (e.g., removable-HDD, USB memory, DVD-R/RW, CD-R/RW, tape, CF/SD card, memory stick, etc.)?	Yes	—
MPII-3.4	Does the device transmit/receive or import/export personally identifiable information via dedicated cable connection (e.g., RS-232, RS-423, USB, FireWire, etc.)?	No	—
MPII-3.5	Does the device transmit/receive personally identifiable information via a wired network connection (e.g., RJ45, fiber optic, etc.)?	Yes	—
MPII-3.6	Does the device transmit/receive personally identifiable information via a wireless network connection (e.g., WiFi, Bluetooth, NFC, infrared, cellular, etc.)?	See Notes	1
MPII-3.7	Does the device transmit/receive personally identifiable information over an external network (e.g., Internet)?	No	—
MPII-3.8	Does the device import personally identifiable information via scanning a document?	No	—
MPII-3.9	Does the device transmit/receive personally identifiable information via a proprietary protocol?	No	—
MPII-3.10	Does the device use any other mechanism to transmit, import or export personally identifiable information?	No	—

Management of Private Data notes:

1) Mobile X-Ray systems may optionally use WiFi to transmit and receive PII.

All X-Ray systems may optionally use a wireless Bluetooth 2D barcode scanner for scanning patient wristbands.

AUTOMATIC LOGOFF (ALOF)

The device's ability to prevent access and misuse by unauthorized users if device is left idle for a period of time.

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Can the device be configured to force reauthorization of logged-in user(s) after a predetermined length of inactivity (e.g., auto-logout, session lock, password protected screen saver)?

ALOF-1

Yes

—

Is the length of inactivity time before auto-logout/screen lock user or administrator configurable?

ALOF-2

Yes

—

AUDIT CONTROLS (AUDT)*The ability to reliably audit activity on the device.*

Can the medical device create additional audit logs or reports beyond standard operating system logs?

AUDT-1

Yes

—

Does the audit log record a USER ID?

AUDT-1.1

Yes

—

Does other personally identifiable information exist in the audit trail?

AUDT-1.2

Yes

Are events recorded in an audit log? If yes, indicate which of the following events are recorded in the audit log:

AUDT-2

Yes

—

Successful login/logout attempts?

AUDT-2.1

Yes

—

Unsuccessful login/logout attempts?

AUDT-2.2

Yes

—

Modification of user privileges?

AUDT-2.3

Yes

—

Creation/modification/deletion of users?

AUDT-2.4

Yes

—

Presentation of clinical or PII data (e.g. display, print)?

AUDT-2.5

Yes

—

Creation/modification/deletion of data?

AUDT-2.6

Yes

—

Import/export of data from removable media (e.g. USB drive, external hard drive, DVD)?

AUDT-2.7

Yes

—

Receipt/transmission of data or commands over a network or point-to-point connection?

AUDT-2.8

Yes

—

Remote or on-site support?

AUDT-2.8.1

Yes

—

Application Programming Interface (API) and similar activity?

AUDT-2.8.2

Yes

—

Emergency access?

AUDT-2.9

Yes

—

Other events (e.g., software updates)?

AUDT-2.10

Yes

—

Is the audit capability documented in more detail?

AUDT-2.11

Yes

—

Can the owner/operator define or select which events are recorded in the audit log?

AUDT-3

Yes

2

Is a list of data attributes that are captured in the audit log for an event available?

AUDT-4

Yes

—

Does the audit log record date/time?

AUDT-4.1

Yes

—

Can date and time be synchronized by Network Time Protocol (NTP) or equivalent time source?

AUDT-4.1.1

Yes

—

Can audit log content be exported?

AUDT-5

Yes

—

Via physical media?

AUDT-5.1

Yes

—

Via IHE Audit Trail and Node Authentication (ATNA) profile to SIEM?

AUDT-5.2

Yes

3

Via Other communications (e.g., external service device, mobile applications)?

AUDT-5.3

No

—

Are audit logs encrypted in transit or on storage media?

AUDT-5.4

No

4

Can audit logs be monitored/reviewed by owner/operator?

AUDT-6

Yes

—

Are audit logs protected from modification?

AUDT-7

Yes

—

Are audit logs protected from access?

AUDT-7.1

Yes

—

Can audit logs be analyzed by the device?

AUDT-8

Yes

—

Audit Controls Notes:

2) All events are stored in the Windows Event Log. Windows provides some controls for defining which events are recorded.

3) Windows Event Forwarding may be used to forward events from the Windows Event Log to a SIEM.

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4) Only Administrators may view the Windows Event Log. Windows Protected Event Logging (PEL) may be used to encrypt the event log.

AUTHORIZATION (AUTH)

The ability of the device to determine the authorization of users.

AUTH-1	Does the device prevent access to unauthorized users through user login requirements or other mechanism?	Yes	—
AUTH-1.1	Can the device be configured to use federated credentials management of users for authorization (e.g., LDAP, OAuth)?	Yes	—
AUTH-1.2	Can the customer push group policies to the device (e.g., Active Directory)?	Yes	<u>5</u>
AUTH-1.3	Are any special groups, organizational units, or group policies required?	No	<u>6</u>
AUTH-2	Can users be assigned different privilege levels based on 'role' (e.g., user, administrator, and/or service, etc.)?	Yes	—
AUTH-3	Can the device owner/operator grant themselves unrestricted administrative privileges (e.g., access operating system or application via local root or administrator account)?	Yes	—
AUTH-4	Does the device authorize or control all API access requests?	Yes	—
AUTH-5	Does the device run in a restricted access mode, or 'kiosk mode', by default?	Yes	<u>7</u>

Authorization Notes:

5) Refer to group policy documentation for a list of permissible group policy changes.

6) Any required group policies are already applied to the medical device. Refer to documentation for the potential impact of changing these group policies. The required local windows user groups are already configured on the medical device. Domain groups must be mapped to local groups to assign user roles.

7) The device starts in a full screen application mode, although non-administrator users may exit to a highly controlled desktop.

CYBER SECURITY PRODUCT UPGRADES (CSUP)

The ability of on-site service staff, remote service staff, or authorized customer staff to install/upgrade device's security patches.

CSUP-1	Does the device contain any software or firmware which may require security updates during its operational life, either from the device manufacturer or from a third-party manufacturer of the software/firmware? If no, answer "N/A" to questions in this section.	Yes	—
CSUP-2	Does the device contain an Operating System? If yes, complete 2.1-2.4.	Yes	—
CSUP-2.1	Does the device documentation provide instructions for owner/operator installation of patches or software updates?	Yes	—
CSUP-2.2	Does the device require vendor or vendor-authorized service to install patches or software updates?	No	—
CSUP-2.3	Does the device have the capability to receive remote installation of patches or software updates?	Yes	—
CSUP-2.4	Does the medical device manufacturer allow security updates from any third-party manufacturers (e.g., Microsoft) to be installed without approval from the manufacturer?	No	<u>8</u>

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CSUP-3	Does the device contain Drivers and Firmware? If yes, complete 3.1-3.4.	Yes	—
CSUP-3.1	Does the device documentation provide instructions for owner/operator installation of patches or software updates?	Yes	—
CSUP-3.2	Does the device require vendor or vendor-authorized service to install patches or software updates?	No	—
CSUP-3.3	Does the device have the capability to receive remote installation of patches or software updates?	Yes	—
CSUP-3.4	Does the medical device manufacturer allow security updates from any third-party manufacturers (e.g., Microsoft) to be installed without approval from the manufacturer?	No	<u>8</u>
CSUP-4	Does the device contain Anti-Malware Software? If yes, complete 4.1-4.4.	Yes	<u>9</u>
CSUP-4.1	Does the device documentation provide instructions for owner/operator installation of patches or software updates?	Yes	—
CSUP-4.2	Does the device require vendor or vendor-authorized service to install patches or software updates?	Yes	—
CSUP-4.3	Does the device have the capability to receive remote installation of patches or software updates?	Yes	—
CSUP-4.4	Does the medical device manufacturer allow security updates from any third-party manufacturers (e.g., Microsoft) to be installed without approval from the manufacturer?	Yes	<u>8, 10</u>
CSUP-5	Does the device contain Non-Operating System commercial off-the-shelf components? If yes, complete 5.1-5.4.	Yes	—
CSUP-5.1	Does the device documentation provide instructions for owner/operator installation of patches or software updates?	Yes	—
CSUP-5.2	Does the device require vendor or vendor-authorized service to install patches or software updates?	No	—
CSUP-5.3	Does the device have the capability to receive remote installation of patches or software updates?	Yes	—
CSUP-5.4	Does the medical device manufacturer allow security updates from any third-party manufacturers (e.g., Microsoft) to be installed without approval from the manufacturer?	No	<u>8</u>
CSUP-6	Does the device contain other software components (e.g., asset management software, license management)? If yes, please provide details or reference in notes and complete 6.1-6.4.	No	—
CSUP-6.1	Does the device documentation provide instructions for owner/operator installation of patches or software updates?	N/A	—
CSUP-6.2	Does the device require vendor or vendor-authorized service to install patches or software updates?	N/A	—
CSUP-6.3	Does the device have the capability to receive remote installation of patches or software updates?	N/A	—
CSUP-6.4	Does the medical device manufacturer allow security updates from any third-party manufacturers (e.g., Microsoft) to be installed without approval from the manufacturer?	N/A	—
CSUP-7	Does the manufacturer notify the customer when updates are approved for installation?	Yes	<u>11</u>

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CSUP-8	Does the device perform automatic installation of software updates?	Yes	—
CSUP-9	Does the manufacturer have an approved list of third-party software that can be installed on the device?	No	<u>12</u>
CSUP-10	Can the owner/operator install manufacturer-approved third-party software on the device themselves?	Yes	<u>12</u>
CSUP-10.1	Does the system have mechanism in place to prevent installation of unapproved software?	Yes	—
CSUP-11	Does the manufacturer have a process in place to assess device vulnerabilities and updates?	Yes	—
CSUP-11.1	Does the manufacturer provide customers with review and approval status of updates?	Yes	<u>11</u>
CSUP-11.2	Is there an update review cycle for the device?	Yes	—

Cybersecurity Product Upgrade Notes:

8) Updates to the Operating System, Drivers / Firmware, Carestream software, integrated 3rd party software, and the host-based IDS/IPS policies are validated by Carestream before being made available for installation. Updates may be installed by Carestream service personnel, by customers using the Security Roll-Up (SRU) tool available for download from Carestream's website, or automatically through the Carestream Product Update Server based on WSUS. Contact carestream Service for additional information.

9) Carestream ImageView medical devices include a host-based Intrusion Detection / Prevention System (IDS/IPS) to whitelist and isolate executable software and Windows Defender Anti-Virus with cloud based protection. Updates to the IDS/IPS are typically required only when there are changes to the Carestream software that require an updated whitelist.

10) Updates to Windows Defender policies are automatic. Carestream software is whitelisted to prevent accidental identification as malware.

11) Customers may access the Cybersecurity End User section of the Carestream Service Portal. This provides customers with access to additional product security information, the Security Roll-Up (SRU) Tool to install security patches, and Product Security Advisories. Customers may subscribe to receive automatic email notifications whenever there are new SRU updates or advisories. Contact Carestream Service for access to the Cybersecurity End User section of the Carestream Service Portal.

12) The included host-based IPS whitelists common Anti-Virus software, allowing Windows Defender to be replaced with alternative solutions. Installation of other 3rd party software may be performed by authorized Carestream Service Personnel or may require the customer to first replace Carestream's host-based IPS with an alternative solution.

HEALTH DATA DE-IDENTIFICATION (DIDT)

The ability of the device to directly remove information that allows identification of a person.

DIDT-1	Does the device provide an integral capability to de-identify personally identifiable information?	Yes	—
DIDT-1.1	Does the device support de-identification profiles that comply with the DICOM standard for de-identification?	Yes	—

DATA BACKUP AND DISASTER RECOVERY (DTBK)

The ability to recover after damage or destruction of device data, hardware, software, or site configuration information.

DTBK-1	Does the device maintain long term primary storage of personally identifiable information / patient information (e.g. PACS)?	No	—
DTBK-2	Does the device have a "factory reset" function to restore the original device settings as provided by the manufacturer?	Yes	—
DTBK-3	Does the device have an integral data backup capability to removable media?	Yes	—
DTBK-4	Does the device have an integral data backup capability to remote storage?	No	—

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DTBK-5 Does the device have a backup capability for system configuration information, patch restoration, and software restoration?

Yes

DTBK-6 Does the device provide the capability to check the integrity and authenticity of a backup?

Yes

EMERGENCY ACCESS (EMRG)

The ability of the device user to access personally identifiable information in case of a medical emergency situation that requires immediate access to stored personally identifiable information.

EMRG-1 Does the device incorporate an emergency access (i.e. "break-glass") feature?

Yes

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13) See http://www.medicalimaging.org/wp-content/uploads/2011/02/Break-Glass_-_Emergency_Access_to_Healthcare_Systems.pdf

HEALTH DATA INTEGRITY AND AUTHENTICITY (IGAU)

How the device ensures that the stored data on the device has not been altered or destroyed in a non-authorized manner and is from the originator.

IGAU-1 Does the device provide data integrity checking mechanisms of stored health data (e.g., hash or digital signature)?

Yes

IGAU-2 Does the device provide error/failure protection and recovery mechanisms for stored health data (e.g., RAID-5)?

No

MALWARE DETECTION/PROTECTION (MLDP)

The ability of the device to effectively prevent, detect and remove malicious software (malware).

MLDP-1 Is the device capable of hosting executable software?

Yes

MLDP-2 Does the device support the use of anti-malware software (or other anti-malware mechanism)? Provide details or reference in notes.

Yes

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MLDP-2.1 Does the device include anti-malware software by default?

Yes

MLDP-2.2 Does the device have anti-malware software available as an option?

No

MLDP-2.3 Does the device documentation allow the owner/operator to install or update anti-malware software?

Yes

MLDP-2.4 Can the device owner/operator independently (re-)configure anti-malware settings?

Yes

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MLDP-2.5 Does notification of malware detection occur in the device user interface?

Yes

MLDP-2.6 Can only manufacturer-authorized persons repair systems when malware has been detected?

No

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MLDP-2.7 Are malware notifications written to a log?

Yes

MLDP-2.8 Are there any restrictions on anti-malware (e.g., purchase, installation, configuration, scheduling)?

Yes

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MLDP-3 If the answer to MLDP-2 is NO, and anti-malware cannot be installed on the device, are other compensating controls in place or available?

N/A

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MLDP-4	Does the device employ application whitelisting that restricts the software and services that are permitted to be run on the device?	Yes	—
MLDP-5	Does the device employ a host-based intrusion detection/prevention system?	Yes	—
MLDP-5.1	Can the host-based intrusion detection/prevention system be configured by the customer?	No	<u>15</u>
MLDP-5.2	Can a host-based intrusion detection/prevention system be installed by the customer?	Yes	<u>15</u>

Malware Detection / Protection Notes:

14) Carestream ImageView medical devices employ a multi-layered security strategy which includes a host-based Intrusion Detection / Prevention System (IDS/IPS) to whitelist and sandbox (limit file and registry access) executable software, Windows Defender Anti-Virus with cloud-based protection, a software firewall configured to block all ports except those required for the function of the device, a whitelist based web proxy server to prevent browsing to potentially malicious websites, and USB device (DLP) protection.

15) The Carestream host-based IDS/IPS may not be configured by customers. Customers seeking more control or additional logging capabilities in their anti-malware software may replace the Carestream IDS/IPS with an alternative solution using provided configuration guidelines. Contact Carestream service for additional information.

NODE AUTHENTICATION (NAUT)

The ability of the device to authenticate communication partners/nodes.

NAUT-1	Does the device provide/support any means of node authentication that assures both the sender and the recipient of data are known to each other and are authorized to receive transferred information (e.g. Web APIs, SMTP, SNMP)?	Yes	<u>16</u>
NAUT-2	Are network access control mechanisms supported (E.g., does the device have an internal firewall, or use a network connection white list)?	Yes	—
NAUT-2.1	Is the firewall ruleset documented and available for review?	Yes	—
NAUT-3	Does the device use certificate-based network connection authentication?	No	—

Node Authentication Notes:

16) TLS 1.2 is used to secure the web server and Web APIs. The user must provide credentials to access the server. Customers may install and manage their own 3rd

CONNECTIVITY CAPABILITIES (CONN)

All network and removable media connections must be considered in determining appropriate security controls. This section lists connectivity capabilities that may be present on the device.

CONN-1	Does the device have hardware connectivity capabilities?	Yes	—
CONN-1.1	Does the device support wireless connections?	See Notes	<u>17</u>
CONN-1.1.1	Does the device support Wi-Fi?	See Notes	<u>17</u>
CONN-1.1.2	Does the device support Bluetooth?	See Notes	<u>18</u>
CONN-1.1.3	Does the device support other wireless network connectivity (e.g. LTE, Zigbee, proprietary)?	No	—
CONN-1.1.4	Does the device support other wireless connections (e.g., custom RF controls, wireless detectors)?	See Notes	<u>19</u>
CONN-1.2	Does the device support physical connections?	Yes	—
CONN-1.2.1	Does the device have available RJ45 Ethernet ports?	See Notes	<u>20</u>
CONN-1.2.2	Does the device have available USB ports?	See Notes	<u>21</u>
CONN-1.2.3	Does the device require, use, or support removable memory devices?	See Notes	<u>22</u>
CONN-1.2.4	Does the device support other physical connectivity?	See Notes	<u>23</u>

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CONN-2	Does the manufacturer provide a list of network ports and protocols that are used or may be used on the device?	Yes	—
CONN-3	Can the device communicate with other systems within the customer environment?	Yes	—
CONN-4	Can the device communicate with other systems external to the customer environment (e.g., a service host)?	See Notes	<u>24</u>
CONN-5	Does the device make or receive API calls?	Yes	—
CONN-6	Does the device require an internet connection for its intended use?	No	—
CONN-7	Does the device support Transport Layer Security (TLS)?	Yes	—
CONN-7.1	Is TLS configurable?	Yes	—
CONN-8	Does the device provide operator control functionality from a separate device (e.g., telemedicine)?	No	—
Connectivity Capabilities Notes:			
17) WiFi is an available option for Mobile X-Ray systems.			
18) Bluetooth is supported only when the optional 2D wireless barcode scanner is in use.			
19) X-Ray detectors may be used in wired or wireless mode. Wireless detectors use 802.11g/n. RF is supported only when the optional wireless exposure switch is in use.			
20) Mobile X-Ray systems have an unused RJ45 port when they are not connected to a wired network.			
21) Availability of open USB ports is determined by the number of optional features that are enabled on the system. DLP settings may be enabled to prevent the use of removable storage devices.			
22) Patient data may be saved to CD, DVD, or USB media using the optional DICOMDIR (IHE Portable Data for Imaging) feature.			
23) Some platforms may use a serial connection to the X-Ray generator or other internal devices.			
24) The system may optionally communicate with the Remote Management Service (RMS) system, managed by PTC ThingWorx.			

PERSON AUTHENTICATION (PAUT)*The ability to configure the device to authenticate users.*

PAUT-1	Does the device support and enforce unique IDs and passwords for all users and roles (including service accounts)?	Yes	—
PAUT-1.1	Does the device enforce authentication of unique IDs and passwords for all users and roles (including service accounts)?	Yes	—
PAUT-2	Is the device configurable to authenticate users through an external authentication service (e.g., MS Active Directory, NDS, LDAP, OAuth, etc.)?	Yes	—
PAUT-3	Is the device configurable to lock out a user after a certain number of unsuccessful logon attempts?	Yes	—
PAUT-4	Are all default accounts (e.g., technician service accounts, administrator accounts) listed in the documentation?	Yes	—
PAUT-5	Can all passwords be changed?	Yes	—
PAUT-6	Is the device configurable to enforce creation of user account passwords that meet established (organization specific) complexity rules?	Yes	—
PAUT-7	Does the device support account passwords that expire periodically?	Yes	—
PAUT-8	Does the device support multi-factor authentication?	Yes	—
PAUT-9	Does the device support single sign-on (SSO)?	Yes	—
PAUT-10	Can user accounts be disabled/locked on the device?	Yes	—
PAUT-11	Does the device support biometric controls?	Yes	—
PAUT-12	Does the device support physical tokens (e.g. badge access)?	Yes	—
PAUT-13	Does the device support group authentication (e.g. hospital teams)?	Yes	—
PAUT-14	Does the application or device store or manage authentication credentials?	See Notes	<u>25</u>

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PAUT-14.1 Are credentials stored using a secure method?

Yes

25

Person Authentication Notes:

25) Credentials are managed by the Windows 10 OS or the Active Directory Domain Service.

PHYSICAL LOCKS (PLOK)

Physical locks can prevent unauthorized users with physical access to the device from compromising the integrity and confidentiality of personally identifiable information stored on the device or on removable media

PLOK-1 Is the device software only? If yes, answer "N/A" to remaining questions in this section.

No

—

PLOK-2 Are all device components maintaining personally identifiable information (other than removable media) physically secure (i.e., cannot remove without tools)?

See Notes

26

PLOK-3 Are all device components maintaining personally identifiable information (other than removable media) physically secured behind an individually keyed locking device?

See Notes

26

PLOK-4 Does the device have an option for the customer to attach a physical lock to restrict access to removable media?

See Notes

26

Physical Locks Notes:

26) The physical locking characteristics will vary with the X-Ray system:

- Mobile Systems: The PC is located behind the covers of the mobile X-Ray system. Tools are required to remove the covers and to remove the computer.

- Mobile Retrofit Systems: The PC is mounted to an existing mobile X-Ray system. Tools are required to remove the computer. A cable lock may be used to secure the computer.

- In-Room Systems: The PC is located in the control room for an X-Ray room. A physical lock may be used to prevent opening the computer case. A cable lock may be used to secure the computer.

ROADMAP FOR THIRD PARTY COMPONENTS IN DEVICE LIFE CYCLE (RDMP)

Manufacturer's plans for security support of third-party components within the device's life cycle.

RDMP-1 Was a secure software development process, such as ISO/IEC 27034 or IEC 62304, followed during product development?

Yes

—

RDMP-2 Does the manufacturer evaluate third-party applications and software components included in the device for secure development practices?

Yes

—

RDMP-3 Does the manufacturer maintain a web page or other source of information on software support dates and updates?

Yes

—

RDMP-4 Does the manufacturer have a plan for managing third-party component end-of-life?

Yes

—

SOFTWARE BILL OF MATERIALS (SBoM)

A Software Bill of Material (SBoM) lists all the software components that are incorporated into the device being described for the purpose of operational security planning by the healthcare delivery organization. This section supports controls in the RDMP section.

SBOM-1 Is the SBoM for this product available?

Yes

—

SBOM-2 Does the SBoM follow a standard or common method in describing software components?

Yes

—

SBOM-2.1 Are the software components identified?

Yes

—

SBOM-2.2 Are the developers/manufacturers of the software components identified?

Yes

—

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SBOM-2.3	Are the major version numbers of the software components identified?	Yes	—
SBOM-2.4	Are any additional descriptive elements identified?	Yes	—
SBOM-3	Does the device include a command or process method available to generate a list of software components installed on the device?	No	—
SBOM-4	Is there an update process for the SBOM?	Yes	—

SYSTEM AND APPLICATION HARDENING (SAHD)

The device's inherent resistance to cyber attacks and malware.

SAHD-1	Is the device hardened in accordance with any industry standards?	Yes	—
SAHD-2	Has the device received any cybersecurity certifications?	Yes	—
SAHD-3	Does the device employ any mechanisms for software integrity checking?	Yes	—
SAHD-3.1	Does the device employ any mechanism (e.g., release-specific hash key, checksums, digital signature, etc.) to ensure the installed software is manufacturer-authorized?	Yes	—
SAHD-3.2	Does the device employ any mechanism (e.g., release-specific hash key, checksums, digital signature, etc.) to ensure the software updates are the manufacturer-authorized updates?	Yes	—
SAHD-4	Can the owner/operator perform software integrity checks (i.e., verify that the system has not been modified or tampered with)?	Yes	—
SAHD-5	Is the system configurable to allow the implementation of file-level, patient level, or other types of access controls?	No	—
SAHD-5.1	Does the device provide role-based access controls?	Yes	—
SAHD-6	Are any system or user accounts restricted or disabled by the manufacturer at system delivery?	Yes	—
SAHD-6.1	Are any system or user accounts configurable by the end user after initial configuration?	Yes	—
SAHD-6.2	Does this include restricting certain system or user accounts, such as service technicians, to least privileged access?	Yes	—
SAHD-7	Are all shared resources (e.g., file shares) which are not required for the intended use of the device disabled?	Yes	—
SAHD-8	Are all communication ports and protocols that are not required for the intended use of the device disabled?	Yes	—
SAHD-9	Are all services (e.g., telnet, file transfer protocol [FTP], internet information server [IIS], etc.), which are not required for the intended use of the device deleted/disabled?	Yes	—
SAHD-10	Are all applications (COTS applications as well as OS-included applications, e.g., MS Internet Explorer, etc.) which are not required for the intended use of the device deleted/disabled?	Yes	—
SAHD-11	Can the device prohibit boot from uncontrolled or removable media (i.e., a source other than an internal drive or memory component)?	Yes	—
SAHD-12	Can unauthorized software or hardware be installed on the device without the use of physical tools?	Yes	<u>27</u>

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SAHD-13	Does the product documentation include information on operational network security scanning by users?	Yes	—
SAHD-14	Can the device be hardened beyond the default provided state?	Yes	—
SAHD-14.1	Are instructions available from vendor for increased hardening?	No	—
SHAD-15	Can the system prevent access to BIOS or other bootloaders during boot?	Yes	—
SAHD-16	Have additional hardening methods not included in 2.3.19 been used to harden the device?	Yes	—

System and Application Hardening Notes:

27) The host-based IPS prevents installation of unauthorized software.
 DLP controls may prevent installation of software from removable media.

SECURITY GUIDANCE (SGUD)

Availability of security guidance for operator and administrator of the device and manufacturer sales and service.

SGUD-1	Does the device include security documentation for the owner/operator?	Yes	—
SGUD-2	Does the device have the capability, and provide instructions, for the permanent deletion of data from the device or media?	No	—
SGUD-3	Are all access accounts documented?	Yes	—
SGUD-3.1	Can the owner/operator manage password control for all accounts?	Yes	—
SGUD-4	Does the product include documentation on recommended compensating controls for the device?	Yes	—

HEALTH DATA STORAGE CONFIDENTIALITY (STCF)

The ability of the device to ensure unauthorized access does not compromise the integrity and confidentiality of personally identifiable information stored on the device or removable media.

STCF-1	Can the device encrypt data at rest?	See Notes	<u>28</u>
STCF-1.1	Is all data encrypted or otherwise protected?	See Notes	<u>28</u>
STCF-1.2	Is the data encryption capability configured by default?	No	—
STCF-1.3	Are instructions available to the customer to configure encryption?	No	—
STCF-2	Can the encryption keys be changed or configured?	No	—
STCF-3	Is the data stored in a database located on the device?	Yes	—
STCF-4	Is the data stored in a database external to the device?	No	—

Health Data Storage Confidentiality Notes:

28) Data at Rest (DAR) encryption available through BitLocker or optional FIPS 140-2 Level 2 certified self-encrypting hard drives on most systems.

TRANSMISSION CONFIDENTIALITY (TXCF)

The ability of the device to ensure the confidentiality of transmitted personally identifiable information.

TXCF-1	Can personally identifiable information be transmitted only via a point-to-point dedicated cable?	Yes	—
TXCF-2	Is personally identifiable information encrypted prior to transmission via a network or removable media?	No	<u>29</u>

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TXCF-2.1	If data is not encrypted by default, can the customer configure encryption options?	Yes	<u>29</u>
TXCF-3	Is personally identifiable information transmission restricted to a fixed list of network destinations?	Yes	—
TXCF-4	Are connections limited to authenticated systems?	No	<u>29</u>
TXCF-5	Are secure transmission methods supported/implemented (DICOM, HL7, IEEE 11073)?	No	—

29) Network encryption is not enabled by default. Customer may leverage encryption features built into Windows 10 (IPSec / Kerberos) or install 3rd party alternatives / SNMPv3.

TRANSMISSION INTEGRITY (TXIG)

The ability of the device to ensure the integrity of transmitted data.

TXIG-1	Does the device support any mechanism (e.g., digital signatures) intended to ensure data is not modified during transmission?	No	—
TXIG-2	Does the device include multiple sub-components connected by external cables?	Yes	—

REMOTE SERVICE (RMOT)

Remote service refers to all kinds of device maintenance activities performed by a service person via network or other remote connection.

RMOT-1	Does the device permit remote service connections for device analysis or repair?	Yes	—
RMOT-1.1	Does the device allow the owner/operator to initiate remote service sessions for device analysis or repair?	Yes	—
RMOT-1.2	Is there an indicator for an enabled and active remote session?	No	—
RMOT-1.3	Can patient data be accessed or viewed from the device during the remote session?	Yes	—
RMOT-2	Does the device permit or use remote service connections for predictive maintenance data?	Yes	—
RMOT-3	Does the device have any other remotely accessible functionality (e.g. software updates, remote training)?	Yes	—

OTHER SECURITY CONSIDERATIONS (OTHR)

NONE