Manufacturer Disclosure Statement for Medical Device Security -- MDS2

Carestream Health, Inc ImageView V1.7		AJ8791		27-Sep-2020
Question ID	Question		See note	
DOC-1	Manufacturer Name	Carestream Health, Inc.		
DOC-2	Device Description	X-Ray Imaging Systems		
DOC-3	Device Model	ImageView V1.7		
DOC-4	Document ID	AJ8791		
		1-800-328-2910	—	
		health.imaging.tsc@carestreamheal		
DOC-5	Manufacturer Contact Information	th.com		
	Intended use of device in network-connected	X-Ray Imaging System	—	
DOC-6	environment:	,,		
DOC-7	Document Release Date	9/27/2020	—	
	Coordinated Vulnerability Disclosure: Does the		—	
	manufacturer have a vulnerability disclosure program			
DOC-8	for this device?	Yes		
	ISAO: Is the manufacturer part of an Information			
DOC-9	Sharing and Analysis Organization?	Yes	_	
	Diagram: Is a network or data flow diagram available			
	that indicates connections to other system			
DOC-10	components or expected external resources?	Yes	_	
	SaMD: Is the device Software as a Medical Device (i.e.			
DOC-11	software-only, no hardware)?	No	_	
DOC-11.1	Does the SaMD contain an operating system?	N/A	_	
	Does the SaMD rely on an owner/operator provided			
DOC-11.2	operating system?	N/A		
	Is the SaMD hosted by the manufacturer?			
DOC-11.3		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	
MPII-1	Protected Health Information (ePHI))?	Yes
	Does the device maintain personally identifiable	
MPII-2	information?	Yes
	Does the device maintain personally identifiable	
	information temporarily in volatile memory (i.e., until	
MPII-2.1	cleared by power-off or reset)?	Yes
	Does the device store personally identifiable	
MPII-2.2	information persistently on internal media?	Yes
		<u> </u>
	Is personally identifiable information preserved in the	
MPII-2.3	device's non-volatile memory until explicitly erased?	
1011 11 2.5	Does the device store personally identifiable	<u> </u>
	information in a database?	Ver
MPII-2.4		Yes
	Does the device allow configuration to automatically	
	Does the device allow configuration to automatically	
	delete local personally identifiable information after	

MPII-2.5	it is stored to a long term solution?	Yes

	Does the device import/export personally identifiable information with other systems (e.g., a wearable monitoring device might export personally	2
MPII-2.6	identifiable information to a server)?	Yes
	Does the device maintain personally identifiable	
	information when powered off, or during power	
MPII-2.7	service interruptions?	Yes
	Does the device allow the internal media to be	
	removed by a service technician (e.g., for separate	
MPII-2.8	destruction or customer retention)?	Yes

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	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	No		
MPII-2.9	storage location)? Does the device have mechanisms used for the transmitting, importing/exporting of personally	Νο		
MPII-3	identifiable information? Does the device display personally identifiable	Yes	-	
MPII-3.1	information (e.g., video display, etc.)?	Yes	—	
MPII-3.2	Does the device generate hardcopy reports or images containing personally identifiable information?	Νο	_	
	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,			
MPII-3.3	CF/SD card, memory stick, etc.)? Does the device transmit/receive or import/export personally identifiable information via dedicated cable connection (e.g., RS-232, RS-423, USB,	Yes	_	
MPII-3.4	FireWire, etc.)? Does the device transmit/receive personally identifiable information via a wired network	Νο	—	
MPII-3.5	connection (e.g., RJ45, fiber optic, etc.)? Does the device transmit/receive personally identifiable information via a wireless network connection (e.g., WiFi, Bluetooth, NFC, infrared,	Yes	_	
MPII-3.6	cellular, etc.)? Does the device transmit/receive personally identifiable information over an external network	See Notes	1	
MPII-3.7	(e.g., Internet)? Does the device import personally identifiable	No	—	
MPII-3.8	information via scanning a document?	No		
MPII-3.9	Does the device transmit/receive personally identifiable information via a proprietary protocol? Does the device use any other mechanism to transmit, import or export personally identifiable	Νο		
MPII-3.10	information?	No	_	
Management of Priv	vate Data notes:			

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.

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

Is the length of inactivity time before autologoff/screen lock user or administrator configurable?

Yes

Yes

AUDIT CONTROLS (AUDT)

The ability to reliably audit activity on the device.

	Can the medical device create additional audit logs or	
AUDT-1	reports beyond standard operating system logs?	Yes
AUDT-1.1	Does the audit log record a USER ID?	Yes

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Does other personally identifiable information exist

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	boes other personally identifiable information exist		
AUDT-1.2	in the audit trail?	Yes	
	Are events recorded in an audit log? If yes, indicate		
	which of the following events are recorded in the		
AUDT-2	audit log:	Yes	
AUDT-2.1	Successful login/logout attempts?	Yes	
AUDT-2.2	Unsuccessful login/logout attempts?	Yes	
AUDT-2.3	Modification of user privileges?	Yes	
AUDT-2.4	Creation/modification/deletion of users?	Yes	
	Presentation of clinical or PII data (e.g. display,		
AUDT-2.5	print)?	Yes	
AUDT-2.6	Creation/modification/deletion of data?	Yes	_
	Import/export of data from removable media (e.g.		_
AUDT-2.7	USB drive, external hard drive, DVD)?	Yes	
A0D1 2.7	Receipt/transmission of data or commands over a	105	
AUDT-2.8	network or point-to-point connection?	Yes	
AUDT-2.8.1	Remote or on-site support?	Yes	—
AUD1-2.8.1	Application Programming Interface (API) and similar	165	—
AUDT-2.8.2	activity?	Yes	
AUDT-2.8.2 AUDT-2.9	Emergency access?		—
		Yes	
AUDT-2.10	Other events (e.g., software updates)?	Yes	—
	Is the audit canability desumanted in more detail?	No	
AUDT-2.11	Is the audit capability documented in more detail?	No	
	Can the owner/operator define or select which	N	2
AUDT-3	events are recorded in the audit log?	Yes	<u>2</u>
	Is a list of data attributes that are captured in the	W	
AUDT-4	audit log for an event available?	Yes	—
AUDT-4.1	Does the audit log record date/time?	Yes	—
	Can date and time be synchronized by Network Time		
AUDT-4.1.1	Protocol (NTP) or equivalent time source?	Yes	
AUDT-5	Can audit log content be exported?	Yes	
AUDT-5.1	Via physical media?	Yes	_
	Via IHE Audit Trail and Node Authentication (ATNA)		_
AUDT-5.2	profile to SIEM?	Yes	<u>3</u>
	Via Other communications (e.g., external service		<u> </u>
AUDT-5.3	device, mobile applications)?	No	
AUU-3.3	Are audit logs encrypted in transit or on storage		—
AUDT-5.4	media?	No	4
AUD1-3.4	Can audit logs be monitored/reviewed by		<u>4</u>
		Vac	
AUDT-6	owner/operator?	Yes	—
AUDT-7	Are audit logs protected from modification?	Yes	
AUDT-7.1	Are audit logs protected from access?	Yes	
AUDT-8	Can audit logs be analyzed by the device?	Yes	
Audit Controls N	otes.		

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 forwarded events from the Windows Event Log to a SIEM.

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. Does the device prevent access to unauthorized users

	through user login requirements or other		
AUTH-1	mechanism?	Yes	_
	Can the device be configured to use federated		
	credentials management of users for authorization		
AUTH-1.1	(e.g., LDAP, OAuth)?	Yes	
	Can the customer push group policies to the device		
AUTH-1.2	(e.g., Active Directory)?	Yes	<u>5</u>
	Are any special groups, organizational units, or group		
AUTH-1.3	policies required?	No	<u>6</u>
	Can users be assigned different privilege levels based		
	on 'role' (e.g., user, administrator, and/or service,		
AUTH-2	etc.)?	Yes	

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	Can the device owner/operator grant themselves		
	unrestricted administrative privileges (e.g., access		
	operating system or application via local root or		
AUTH-3	administrator account)?	Yes	
	Does the device authorize or control all API access		
AUTH-4	requests?	Yes	
	Does the device run in a restricted access mode, or		
AUTH-5	'kiosk mode', by default?	Yes	<u>7</u>
	han.		

Authorization Notes:

CSUP-1

CSUP-2

CSUP-2.1

CSUP-2.2

ACME

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

<u>8</u>

7) The device starts in a full screen application mode, although non-adminstrator 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.	
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
Does the device contain an Operating System? If yes, complete 2.1-2.4.	Yes
Does the device documentation provide instructions for owner/operator installation of patches or software updates?	Yes
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?
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?
CSUP-3	Does the device contain Drivers and Firmware? If yes, complete 3.1-3.4.
CSUP-3.1	Does the device documentation provide instructions for owner/operator installation of patches or software updates?
CSUP-3.2	Does the device require vendor or vendor-authorized service to install patches or software updates?
CSUP-3.3	Does the device have the capability to receive remote installation of patches or software updates?
	Does the medical device manufacturer allow security

	updates from any third-party manufacturers (e.g.,	
	Microsoft) to be installed without approval from the	
CSUP-3.4	manufacturer?	No <u>8</u>
	Does the device contain Anti-Malware Software? If	
CSUP-4	yes, complete 4.1-4.4.	Yes <u>9</u>
	Does the device documentation provide instructions	
	for owner/operator installation of patches or	
CSUP-4.1	software updates?	Yes
	Does the device require vendor or vendor-authorized	d
CSUP-4.2	service to install patches or software updates?	No

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	Does the device have the capability to receive remote		
CSUP-4.3	installation of patches or software updates?	Yes	
	Does the medical device manufacturer allow security		—
	updates from any third-party manufacturers (e.g.,		
	Microsoft) to be installed without approval from the		
CSUP-4.4	manufacturer?	Yes	<u>8, 10</u>
	Does the device contain Non-Operating System		
	commercial off-the-shelf components? If yes,		
CSUP-5	complete 5.1-5.4.	Yes	
	Does the device documentation provide instructions		—
	for owner/operator installation of patches or		
CSUP-5.1	software updates?	Yes	
			—
	Does the device require vendor or vendor-authorized		
CSUP-5.2	service to install patches or software updates?	No	
	Does the device have the capability to receive remote		
CSUP-5.3	installation of patches or software updates?	Yes	
	Does the medical device manufacturer allow security		
	updates from any third-party manufacturers (e.g.,		
	Microsoft) to be installed without approval from the		
CSUP-5.4	manufacturer?	No	<u>8</u>
	Does the device contain other software components		
	(e.g., asset management software, license		
	management)? If yes, please provide details or		
CSUP-6	refernce in notes and complete 6.1-6.4.	No	_
	Does the device documentation provide instructions		
	for owner/operator installation of patches or		
CSUP-6.1	software updates?	N/A	_
	Does the device require vendor or vendor-authorized		
CSUP-6.2	service to install patches or software updates?	N/A	—
	Does the device have the capability to receive remote		
CSUP-6.3	installation of patches or software updates? Does the medical device manufacturer allow security	N/A	—
	updates from any third-party manufacturers (e.g., Microsoft) to be installed without approval from the		
CSUP-6.4	manufacturer?	N/A	
CJUF -0.4	Does the manufacturer notify the customer when		—
CSUP-7	updates are approved for installation?	Yes	<u>11</u>
C30F-7	Does the device perform automatic installation of		±±
CSUP-8	software updates?	Yes	
			—
	Does the manufacturer have an approved list of third		
CSUP-9	party software that can be installed on the device?	No	<u>12</u>
	Can the owner/operator install manufacturer-		<u></u>
	approved third-party software on the device		
CSUP-10	themselves?	Yes	<u>12</u>
	Does the system have mechanism in place to prevent		<u> </u>
CSUP-10.1	installation of unapproved software?	Yes	
	Does the manufacturer have a process in place to		
CSUP-11	assess device vulnerabilities and updates?	Yes	
	Does the manufacturer provide customers with		

	Does the manufacturer provide customers with		
CSUP-11.1	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. Contract carestream Service for additional information.

9) Carestream ImageView medical devices include a host-based Intrusion Detection / Prevention System (IDS/IPS) to whitelist and sandbox 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.

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Unrestricted Internal Use Page: 5 of 13 Carestream Health, Inc ImageView V1.7 AJ8791 27-Sep-2020 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. Contract 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 McAfee, Network Associates, Symantec, or TrendMicro 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. Does the device provide an integral capability to de-DIDT-1 identify personally identifiable information? Yes Does the device support de-identification profiles that comply with the DICOM standard for de-DIDT-1.1 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. Does the device maintain long term primary storage of personally identifiable information / patient information (e.g. PACS)? DTBK-1 No Does the device have a "factory reset" function to restore the original device settings as provided by the DTBK-2 manufacturer? Yes Does the device have an integral data backup DTBK-3 capability to removable media? Yes Does the device have an integral data backup DTBK-4 capability to remote storage? No Does the device have a backup capability for system configuration information, patch restoration, and DTBK-5 software restoration? Yes Does the device provide the capability to check the DTBK-6 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.

 Does the device incorporate an emergency access

 I.e. "break-glass") feature?

 Yes

 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 nonauthorized manner and is from the originator. Does the device provide data integrity checking mechanisms of stored health data (e.g., hash or digital signature)?



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IGAU-1

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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
	Does the device support the use of anti-malware	
	software (or other anti-malware mechanism)?	
MLDP-2	Provide details or reference in notes.	Yes <u>14</u>
	Does the device include anti-malware software by	
MLDP-2.1	default?	Yes
	Does the device have anti-malware software	
MLDP-2.2	available as an option?	No
	Does the device documentation allow the	
	owner/operator to install or update anti-malware	
MLDP-2.3	software?	Yes
	Can the device owner/operator independently (re-	
MLDP-2.4)configure anti-malware settings?	No <u>15</u>
	Does notification of malware detection occur in the	
MLDP-2.5	device user interface?	Yes
	Can only manufacturer-authorized persons repair	
MLDP-2.6	systems when malware has been detected?	No <u>15</u>
MLDP-2.7	Are malware notifications written to a log?	Yes
	Are there any restrictions on anti-malware (e.g.,	
MLDP-2.8	purchase, installation, configuration, scheduling)?	Yes <u>15</u>
WILDF-2.8	purchase, installation, computation, scheduling):	Yes <u>15</u>
	If the answer to MLDP-2 is NO, and anti-malware	
	cannot be installed on the device, are other	
MLDP-3	compensating controls in place or available?	N/A
	Does the device employ application whitelisting that	
	restricts the software and services that are permitted	
MLDP-4	to be run on the device?	Yes
	Does the device employ a host-based intrusion	
MLDP-5	detection/prevention system?	Yes
	Can the host-based intrusion detection/prevention	
MLDP-5.1	system be configured by the customer?	No <u>15</u>
		<u> </u>
	Can a host-based intrusion detection/prevention	
MLDP-5.2	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 Carestrem 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.

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Node Authentication Notes:

16) Windows credentials must be provided before accessing the Web APIs via SSO.

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.				
	Does the device have hardware connectivity				
CONN-1	capabilities?	Yes			
CONN-1.1	Does the device support wireless connections?	Yes			
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>		
60NN 4 4 2	Does the device support other wireless network	A.L			
CONN-1.1.3	connectivity (e.g. LTE, Zigbee, proprietary)?	No	—		
	Does the device support other wireless connections				
CONN-1.1.4	(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>20</u> <u>21</u>		
	Does the device require, use, or support removable				
CONN-1.2.3	memory devices?	See Notes	<u>22</u>		
CONN-1.2.4	Does the device support other physical connectivity?	See Notes	<u>23</u>		
CONN-1.2.4	Does the manufacturer provide a list of network	See Notes	25		
	ports and protocols that are used or may be used on				
CONN-2	the device?	Yes			
0011112	Can the device communicate with other systems		—		
CONN-3	within the customer environment?	Yes			
	Can the device communicate with other systems		—		
	external to the customer environment (e.g., a service				
CONN-4	host)?	See Notes	<u>24</u>		
CONN-5	Does the device make or receive API calls?	Yes			
	Does the device require an internet connection for its				
CONN-6	intended use?	No	_		
	Does the device support Transport Layer Security				
CONN-7	(TLS)?	Yes	_		
CONN-7.1	Is TLS configurable?	Yes			
	Does the device provide operator control				
	functionality from a separate device (e.g.,				
CONN-8	telemedicine)?	No	_		
Connectivity Capa	abilities Notes:				
	17) WiFi is an available option for Mobile X-Ray syster				
	18) Bluetooth is supported only when the optional 2D				
	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 rea	movable storage devices.			

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22) Patient data may be saved to CD, DVD, or USB media using the optional DICOMDIR (IHE Portable Data for Imaging) feature.23) Legacy systems upgraded to the ImageView software platform may use a serial connection to the X-Ray generator.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		
	<i>users.</i> Does the device support and enforce unique IDs and		
	passwords for all users and roles (including service		
PAUT-1	accounts)?	Yes	_
	Does the device enforce authentication of unique IDs		
	and passwords for all users and roles (including		
PAUT-1.1	service accounts)?	Yes	_
	Is the device configurable to authenticate users		
	through an external authentication service (e.g., MS		
PAUT-2	Active Directory, NDS, LDAP, OAuth, etc.)?	Yes	
			_
	Is the device configurable to lock out a user after a		
PAUT-3	certain number of unsuccessful logon attempts?	Yes	_
	Are all default accounts (e.g., technician service		
	accounts, administrator accounts) listed in the	M. J	
PAUT-4	documentation?	Yes	_
PAUT-5	Can all passwords be changed?	Yes	—
	Is the device configurable to enforce creation of user		
	account passwords that meet established		
PAUT-6	(organization specific) complexity rules?	Yes	_
	Does the device support account passwords that		
PAUT-7	expire periodically?	Yes	_
	Deep the device support multi-factor outherstication?	Vec	
PAUT-8 PAUT-9	Does the device support multi-factor authentication? Does the device support single sign-on (SSO)?	Yes	—
TAUT-5	bes the device support single sign of (556).		-
PAUT-10	Can user accounts be disabled/locked on the device?	Yes	
PAUT-11	Does the device support biometric controls?	Yes	
	Does the device support physical tokens (e.g. badge		
PAUT-12	access)?	Yes	_
	Does the device support group authentication (e.g.		
PAUT-13	hospital teams)?	Yes	—
	Does the application or device store or manage		25
PAUT-14	authentication credentials?	See Notes	<u>25</u> 25
PAUT-14.1	Are credentials stored using a secure method?	Yes	<u>25</u>

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 Is the device software only? If yes, answer "N/A" to

PLC	0K-1	remaining questions in this section.	No	
		Are all device components maintaining personally		
		identifiable information (other than removable		
		media) physically secure (i.e., cannot remove without		
PLC)К-2	tools)?	See Notes	<u>26</u>
		Are all device components maintaining personally		
		identifiable information (other than removable		
		media) physically secured behind an individually		
PLC)К-З	keyed locking device?	See Notes	<u>26</u>
		Does the device have an option for the customer to		
		attach a physical lock to restrict access to removable		
PLC)К-4	media?	See Notes	<u>26</u>

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Physical Locks Notes:

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

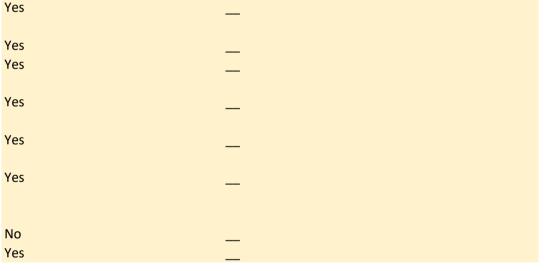
- Mobile Systems: The PC is located behind the covers of the mobile X-Ray system. Tools are required to remove the covers and to remove the co
- Mobile Retrofit Systems: The PC is mounted to an existing mobile X-Ray system. Tools are required to remove the computer. A cable lock may be
- In-Room Systems: 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.

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.	
	Was a secure software development process, such as	
	ISO/IEC 27034 or IEC 62304, followed during product	
RDMP-1	development?	Yes
	Does the manufacturer evaluate third-party	
	applications and software components included in	
RDMP-2	the device for secure development practices?	Yes
	Does the manufacturer maintain a web page or other	
	source of information on software support dates and	
RDMP-3	updates?	Yes
	Does the manufacturer have a plan for managing	
RDMP-4	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
	Does the SBoM follow a standard or common	
SBOM-2	method in describing software components?	Yes
SBOM-2.1	Are the software components identified?	Yes
	Are the developers/manufacturers of the software	
SBOM-2.2	components identified?	Yes
	Are the major version numbers of the software	
SBOM-2.3	components identified?	Yes
SBOM-2.4	Are any additional descriptive elements identified?	Yes
	Does the device include a command or process	
	method available to generate a list of software	
SBOM-3	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. Is the device hardened in accordance with any 27-Sep-2020

SAHD-1	industry standards?	Yes
	Has the device received any cybersecurity	
SAHD-2	certifications?	No
	Does the device employ any mechanisms for	
SAHD-3	software integrity checking	Yes
	Does the device employ any mechanism (e.g., release	<mark>-</mark>
	specific hash key, checksums, digital signature, etc.)	
	to ensure the installed software is manufacturer-	
SAHD-3.1	authorized?	Yes

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	Does the device employ any mechanism (e.g., release- specific hash key, checksums, digital signature, etc.) to ensure the software updates are the manufacturer-		
SAHD-3.2	authorized updates?	Yes	_
	Can the owner/operator perform software integrity		
SAHD-4	checks (i.e., verify that the system has not been modified or tampered with)?	Yes	
	Is the system configurable to allow the implementation of file-level, patient level, or other		
SAHD-5	types of access controls?	No	_
SAHD-5.1	Does the device provide role-based access controls?	Yes	_
	Are any system or user accounts restricted or		
SAHD-6	disabled by the manufacturer at system delivery? Are any system or user accounts configurable by the	Yes	—
SAHD-6.1	end user after initial configuration? Does this include restricting certain system or user	Yes	_
	accounts, such as service technicians, to least		
SAHD-6.2	privileged access? Are all shared resources (e.g., file shares) which are	Yes	—
SAHD-7	not required for the intended use of the device disabled?	Yes	
SAND-7	Are all communication ports and protocols that are		—
SAHD-8	not required for the intended use of the device disabled?	Yes	
	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		
SAHD-9	deleted/disabled? Are all applications (COTS applications as well as OS-	Yes	—
	included applications, e.g., MS Internet Explorer, etc.) which are not required for the intended use of the		
SAHD-10	device deleted/disabled?	Yes	_
	Can the device prohibit boot from uncontrolled or		
SAHD-11	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>
	Does the product documentation include information		
SAHD-13	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	
	Can the system prevent access to BIOS or other		
SHAD-15	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 Applicat			—

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)

the owner/operator?

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

SGUD-1

Yes

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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? Can the owner/operator manage password control	Yes	
SGUD-3.1	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>
	Is the data encryption capability configured by		
STCF-1.2	default?	No	_
	Are instructions available to the customer to		
STCF-1.3	configure encryption?	No	<u> </u>
STCF-2	Can the encryption keys be changed or configured? Is the data stored in a database located on the	No	_
STCF-3	device?	Yes	
	Is the data stored in a database external to the		
STCF-4	device?	No	

Health Data Storage Confidentiality Notes:

28) Data at Rest (DAR) encryption available through 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 TXCF-2.1	Is personally identifiable information encrypted prior to transmission via a network or removable media? If data is not encrypted by default, can the customer configure encryption options?	No	_
TXCF-3	Is personally identifiable information transmission restricted to a fixed list of network destinations?	Yes	_
TXCF-4 TXCF-5	Are connections limited to authenticated systems? Are secure transmission methods supported/implemented (DICOM, HL7, IEEE 11073)?	No	_

TRANSMISSION INTEGRITY (TXIG)

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

Does the device support any mechanism (e.g., digital signatures) intended to ensure data is not modified

TXIG-1during transmission?Does the device include multiple sub-componentsTXIG-2connected by external cables?



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	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 initiative 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
	Does the device have any other remotely accessible functionality (e.g. software updates, remote	
RMOT-3	training)?	Yes

OTHER SECURITY CONSIDERATIONS (OTHR)

Notes:

Example note. Please keep individual notes to one cell. Please use separate notes for separate information

Note 1

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