Medical Device Security Health Imaging Digital Capture

Security Assessment Report for the Kodak Medical Image Manager (MIM) Version 6.1.1

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Executive Summary

Kodak Health Imaging ("Kodak") has recognized that digital imaging and related patient data requires an overall the approach is to include privacy & security requirements in the product design stage. In addition mitigation processes are required to significantly increase system security and patient safety. This document consists of a summary of the Medical Image Manager (MIM) PACSLink v6.1.1 (hereafter referred to as the "Product") security assessment, mitigation processes, and actions taken by Kodak to assist the medical community.

Testing procedures entailed analyzing the device for security vulnerabilities using vulnerability scanners, assessing the configuration for National Security Agency (NSA) Hardening Guidelines, and analyzing HIPAA Capabilities. Direct assessment procedures used at Kodak are able to verify implementation of HIPAA security controls.

Extensive steps have been taken to harden the Windows OS and to authenticate all types of users. The Windows 2000 Operating System is secured above and beyond the default configuration in all required services, accounts, and ports so that a standard malware that assumes a default configuration will fail. Windows 2000 user account policies, user rights, and security options were configured to satisfy relevant NSA guidelines (see references).

Health Imaging Overview

The worldwide trend of migrating images & patient data from film to an electronic format is rapidly reaching many aspects of the medical community. One of the areas affected is the medical imaging sector, where patient-identifiable information can be found in an electronic format in a variety of computer systems, many of which are medical devices. Since these devices contain patient information, they need to be hardened to protect confidentiality. Additionally, the FDA monitors medical device manufactures to ensure the hardware and software functionality meets diagnostic and patient safety requirements.

Kodak has assigned a Malware Quick Action Team (MQAT) and a Network Vulnerability Protection (NVP) Lab to assess the current state of security of a medical device and to assist customers with protection of such devices. These teams focus is on protecting the confidentiality of patient-identifiable information, ensuring data integrity, and protecting the functionality of a medical device.

After the assessment, Kodak works with both OS vendors and medical facilities to deploy updates as required that mitigate vulnerabilities. In many cases the medical facility can increase security through network design, such as using virtual local area networks (VLANs) and firewalls. If this process occurs prior to installation, security can be built into the network infrastructure, saving significant time and future effort. In conjunction with network infrastructure security, Kodak provides service modifications that include

OS and application configuration changes that incorporate OS vendor patches to increase security. Limitations in this area are that any changes made to a medical device must fit into the change management plan that the FDA approved for the device.

Product Description

The Product is a PC that runs the Windows 2000 Operating System. The Productoperates by using an attached keypad (touchscreen or conventional), thus, not requiring the use of the keyboard/mouse by the clinical user.

The custom user interface limits the user to the specific functions defined for the product; hence, preventing user access to the operating system's desktop. Medical Images and DICOM IOD's are the only files that are transmitted and received over the TCP/IP network using the DICOM protocol. No EMAIL services are configured or available to the user.

Extensive security actions have been taken to include (not all inclusive); harden the Windows OS, individual user authentication and provisioning of digital certificates for service access. The Windows 2000 Operating System is secured through changes to the default configuration which includes removal or deactivation of services, accounts, and ports not required for clinical operations to reduce the risks of malware that typically attacks a default configuration. Windows 2000 user account policies, user rights, and security options were configured to satisfy relevant NSA guidelines (see references).

Field Service users require identification and authorization through a mechanism controlled by Kodak. This security design controls the access to ensure only properly certified users can access the product configuration.

Assessment Methodology

Assessments consist of three areas; vulnerability assessment, hardening guidelines comparison, and HIPAA control analyses. The vulnerability assessment portion is conducted by using a commercially available security scanner. The scanner electronically probes the device for security holes that may allow a hacker or malware compromise a system. Vulnerabilities identified range in severity, depending upon the degree of possible damage and likelihood that an attack could occur. For example a vulnerability that allow malware to crash Internet Explorer would be less severe that a vulnerability that would allow a hacker to alter information on a hard drive.

During the hardening guideline comparison, device configuration are analyzed and compared to the NSA Hardening Guidelines. For the HIPAA enabling functionality, critical areas are examined. This provided verification that items such as password protection are being implemented. All aspects of the assessment are documented in technical reports and can be provided to the medical community.

Process Methodology

The MQAT and NVP processes are designed to assist medical device users increase security of current devices and to build security into future releases. This is accomplished through a multi-tier assessment process that provides the medical community with information on how to increase security of a device. The process includes an evaluation of the vulnerabilities, system configuration and HIPAA controls. If weaknesses in the device security are identified, mitigation steps are developed from this assessment and the OS provider and Kodak work to reduce vulnerabilities. After mitigation, a second assessment is completed to document any changes that influenced security of the device.

Conclusion

The Product was assessed at the Kodak development lab in Plano, TX. Testing procedures entailed analyzing the device for security vulnerabilities using for security assessment tools (STAT, NMAP, NESSUS) using NSA Hardening Guidelines, as well as, HIPAA security requirements. The results of the scans of the system identified the TCP & UPD network ports active, in addition which security patches were implemented for this device. A port scan of the system identified 34 open ports, none of which are typically open by malware.

Kodak's testing included the capability of our medical customers for active user authentication controls related to the HIPAA security rule. These mainly fall under the "Technical Controls" area. Details of the Hardening and OS compliance and which include security patches included to reduce impact of know vulnerabilities are included at the end of this report.

Results

Tested security updates of Microsoft patches for the Product are made available for the installed base after the Malware Quick Action Team has confirmed that the Product is vulnerable to the security threat.

User Authentication:

- Users must logon to the product (not the OS) with a username and password at the user interface prior to accessing PHI related information (user authentication).
- User passwords and all user management related fields are stored in an encrypted form when exported to the Product's configuration diskette.
- Service Users must authenticate by means of a time sensitive based digital certificate issued by Kodak prior to allowing access to the system administration tool (AccessLink).
- All Service access occurs through a secure encrypted tunnel between the Service Users' PC and the product (SecureLink).
- Access to the Product desktop requires an active connection to a service laptop that has exchanged a Kodak digital certificate with the Product, and then a subsequent logon to an OS user account. (SecureDesktop).
- Number of OS user accounts are limited. Guest account is disabled and the Administrator account is renamed.
- OS logon screen does not display the last logged on user.
- OS accounts do not use a portion of the username as the password.
- SQL Server database logon requires MS Windows credentials or SQL Server credentials locally or via the network.
- New software including binaries (.exe or .dll files) and scripts (.vbs or .bat) can only be installed on the Product by an authorized Kodak Service Technician running with a current authentication certificate.

Operating System & Operating System Components:

- Latest Service Pack is installed for the Windows 2000 operating system (SP4).
- No automatic update components are enabled on the product.
- Microsoft Outlook Express is un-installed. There is no e-mail transfer or user agent on the system, and the SMTP and IMAP ports are blocked, so the system is invulnerable to viruses that propagate via e-mail.
- Public community rights for the SNMP Service are removed.

- Operating System Services that are not required by the Product are configured to start manually or disabled as appropriate.
- All TCP network ports are closed with the exception of these ports:
 - 53 DNS
 - 80 HTTP
 - 85 IIS
 - 135 DCOM
 - 210 Service Access
 - 220 Service Access
 - 443 HTTPS
 - 1433 SQL
 - 2243 SQL
 - 2433 SQL
 - 3000 DCOM
 - 3001 DCOM
 - 3002 DCOM
 - 3003 DCOM
 - 3004 DCOM
 - 3021 Application Access
 - 3020 Application Access
 - 3121 Application Access
 - 3180 Application Access
 - 4021 Application Access
 - 4023 Application Access
 - 4080 Application Access
 - 4121 Application Access
 - 4123 Application Access
 - 4180 Application Access
 - 4190 Service Access
 - 4191 Service Access
 - 5040 DICOM Print SCP
 - 5199 Application Access
 - 5405 HIS/RIS
- All UDP network ports are filtered by IP Address with the exception of these ports (required for the DirectView software to run):
 - 53 DNS
 - 135 DCOM
 - 1433 SQL
 - 5631 pcAnywhere
- Latest Microsoft Security patches are installed at the time the official production release media is generated (see security patches).
- The Kodak software release process ensures that any software release or system image must undergo a full virus scan with latest virus definitions before release to the field.

References:

- 1. Windows 2000 Security Checklist LabMice.Net
- 2. Guide to Securing Microsoft Windows 2000 File and Disk Resources NSA
- 3. Guide to Securing Microsoft Windows 2000 Group Policy NSA
- 4. Guide to Securing Microsoft Windows 2000 Active Directory NSA
- 5. Guide to Securing Microsoft Windows 2000 DHCP NSA
- 6. Guide to Securing Microsoft Windows 2000 Encrypting File System NSA
- 7. Guide to Securing Microsoft Windows 2000 Group Policy: Security Configuration Tool Set NSA

Security Patches Included in the Product:

- 1. Cumulative Security Update for Outlook Express 6 SP1 (KB823353)
- 2. Security Update for Internet Explorer 6 Service Pack 1 (KB833989)
- 3. Microsoft GDI+ Detection Tool (KB873374)
- 4. Critical Update for ADODB.stream (KB870669)
- 5. Security Update for Windows 2000 (KB837001)
- 6. MS04-012: Security Update for Windows 2000 (KB828741)
- 7. MS04-011: Security Update for Windows 2000 (KB835732)
- 8. Security Update for Microsoft Data Access Components (KB832483)
- 9. Security Update for Microsoft Windows (KB828749)
- 10. Security Update for Microsoft Windows 2000 (KB828035)
- 11. Security Update for Microsoft Windows 2000 (KB825119)
- 12. Security Update for Microsoft Windows 2000 (KB826232)
- 13. Security Update for Windows 2000 (KB823182)
- 14. Cumulative Security Update for Internet Explorer 6 Service Pack 1 (KB867282)
- 15. Security Update for Windows 2000 (KB891781)
- 16. MS05-011: Security Update for Windows 2000 (KB885250)
- 17. Security Update for Windows 2000 (KB888113)
- 18. Security Update for Windows 2000 (KB890047)
- 19. Security Update for Windows 2000 (KB873333)
- 20. Security Update for Windows 2000 (KB890175)
- 21. Security Update for Windows 2000 (KB891711)
- 22. Security Update for Windows 2000 (KB873339)
- 23. MS05-003: Security Update for Windows 2000 (KB871250)
- 24. Security Update for Windows 2000 (KB885836)
- 25. Security Update for Windows 2000 (KB885835)
- 26. Security Update for Windows 2000 (KB840315)
- 27. MS04-019: Security Update for Windows 2000 (KB842526)
- 28. MS04-022: Security Update for Windows 2000 (KB841873)
- 29. Security Update for Windows 2000 (KB841356)
- 30. Security Update for Windows 2000 (KB840987)
- 31. MS04-020: Security Update for Windows 2000 (KB841872)
- 32. MS04-031: Security Update for Windows 2000 (KB841533)

- 33. Security Update for DirectX 7.0 (KB839643)
- 34. Security Update for Windows 2000 (KB839645)
- 35. Security Update for Windows 2000 (KB837001)
- 36. MS04-030: Security Update for Windows 2000 (KB824151)
- 37. MS04-012: Security Update for Windows 2000 (KB828741)
- 38. MS04-011: Security Update for Windows 2000 (KB835732)
- 39. Security Update for Microsoft Data Access Components (KB832483)
- 40. Security Update for Windows 2000 (KB823182)
- 41. Cumulative Security Update for Internet Explorer 6 Service Pack 1 (KB890923)
- 42. MS05-019: Security Update for Windows 2000 (KB893066)
- 43. Security Update for Windows 2000 (KB893086)
- 44. MS05-018: Security Update for Windows 2000 (KB890859)
- 45. Microsoft Windows Installer 3.1
- 46. Update for Background Intelligent Transfer Service (BITS) 2.0 and WinHTTP 5.1 (KB842773)