

FINAL DRAFT

WIRELESS MEDICAL INFUSION PUMPS

Medical Device Security

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1 **1. DESCRIPTION**

2 **Purpose**

3 In the past, medical devices were stand-alone instruments that interacted only with the
4 patient. Today, medical devices have operating systems and communication hardware
5 that allow them to connect to networks and other devices. While this technology has
6 created more powerful tools and improved health care, it has led to additional safety
7 and security risks.

8 The goal of this use case is to help health care providers secure their medical devices on
9 an enterprise network, with a specific focus on wireless infusion pumps.¹ This use case
10 begins the process to identify the actors interacting with infusion pumps, define the
11 interactions between the actors and the system, perform a risk assessment, identify
12 mitigating security technologies, and provide an example implementation.

13 Clinicians and patients rely on infusion pumps for safe and accurate administration of
14 fluids and medications. However, the Food and Drug Administration (FDA) has identified
15 problems that can compromise the safe use of external infusion pumps. These issues
16 can lead to over- or under-infusion, missed treatments, or delayed therapy.

17 The publication of this use case is merely the beginning of a process that will identify
18 research participants and components of a laboratory environment to identify, evaluate,
19 and test relevant security tools and controls. The approach may include risk assessment
20 and analysis, logical design, build development, test and evaluation, and security control
21 mapping. The output of the process will be the publication of a multi-part practice guide
22 that will help the community evaluate the security environment surrounding infusion
23 pumps deployed in a clinical setting and provide a reference solution to mitigating
24 security tasks.

¹ The Food and Drug Administration has defined external infusion pumps as:

“Medical devices that deliver fluids, including nutrients and medications such as antibiotics, chemotherapy drugs, and pain relievers, into a patient’s body in controlled amounts. Many types of pumps, including large volume, patient-controlled analgesia, elastomeric, syringe, enteral, and insulin pumps, are used worldwide in health care facilities such as hospitals, and in the home.”

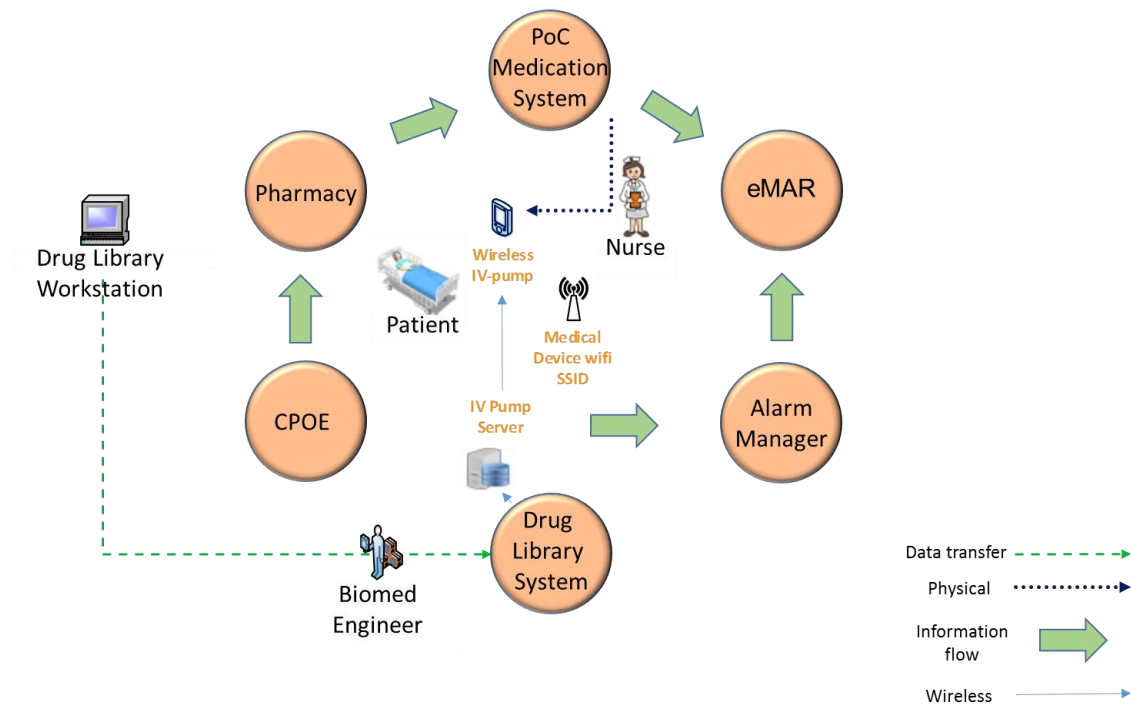
25 **Scope**

26 The scope of this use case is to follow the life cycle of an infusion pump from planning
27 the purchase of the pump to decommissioning it. Life cycle management includes:

- 28 • Procurement
- 29 • Onboarding of asset
- 30 • Training and instructions for use
- 31 • Configuration
- 32 • Use
- 33 • Maintenance
- 34 • Decontamination
- 35 • Decommissioning

36 **2. HIGH-LEVEL ARCHITECTURE**

37 This diagram identifies high-level areas in a hospital’s technology infrastructure that
38 may interact directly or indirectly with the patient’s infusion pump. During the
39 development of the laboratory environment implementing the use case, the diagram
40 will be refined into component flows and mapped to a physical architecture in the lab
41 environment.



42

43 This architecture may include:

- 44 • Patient
- 45 • Health care professional
- 46 • Wireless infusion pump
- 47 • Pump server
- 48 • Wireless network
- 49 • Alarm manager
- 50 • Electronic medication administration record (eMAR) system
- 51 • Point of care medication system
- 52 • Pharmacy
- 53 • Computerized physician order entry (CPOE)
- 54 • Drug library
- 55 • Biomedical engineering

56 **3. SCENARIO**

57 **Actors**

58 The infusion pump use case has multiple actors who may interact with the device. They
59 interact with the relevant systems to deliver patient care in the environment. However,
60 the environment can include bad actors. The actors include:

- 61 • Patient
- 62 • Health care professional
- 63 • Pharmacist
- 64 • Pump vendor engineer
- 65 • Biomedical engineer
- 66 • Medical information technology (IT)-network risk manager
- 67 • IT security engineer
- 68 • IT network engineer
- 69 • Central supply worker
- 70 • Patient visitor
- 71 • Hacker

72 **Scenarios**

73 The scenario is based on the actors and the interactions each has with an infusion
74 pump. The scenario may be modified based upon input from the build team.

75 The basic scenario begins with an IT network engineer provisioning the wireless network
76 and a biomedical engineer acquiring and connecting the infusion pump to the network.
77 A health care professional then configures the device for use with a patient. A doctor
78 prescribes medications for a patient and a pharmacist dispenses them. Once the device
79 is set up and configured, a health care professional uses it on a patient. Supporting
80 activity is provided by an IT security engineer and central supply workers, who make
81 sure the pump is available and secure. Patient visitors may indirectly interact with
82 health care workers if they or the patient have questions or concerns. Hackers may
83 attempt to attack the pump through various vectors, including the pump, pump server,
84 wireless network, clinical systems, and the hospital IT systems. Further activities include
85 general maintenance and ultimately decommissioning and disposal of the device.

86 **4. CURRENT INFUSION PUMP CHALLENGES**

87 The following challenge areas will be addressed during the laboratory research and
88 documented in the practice guide. Other challenge areas may be identified during the
89 project.

- 90 • Access codes
- 91 • Access point (AP)/wireless network configuration
- 92 • Alarms
- 93 • Asset management and monitoring
- 94 • Authentication and credentialing
- 95 • Maintenance and updates
- 96 • Pump variability
- 97 • Use
- 98 • Emergency use

99 **5. BUSINESS VALUE**

100 This use case will provide business value to health care organizations using wireless
101 infusion pumps. It will also provide business value to infusion pump vendors as a
102 reference solution to vulnerabilities is identified. Additional value includes:

- 103 • Reduced errors
- 104 • Provide secured medical devices that balance usability and protection of the
105 information and data with protection of the network
- 106 • Provide medical devices that balance security features with patient safety
- 107 • Reduce total outlays in redundant enterprise network security systems by
108 improving security of medical devices

- 109 • Broaden visibility of user behavior in accessing and working on enterprise health
- 110 care networks in order to bolster identity and access management capabilities
- 111 • Reduce the negative impacts to the reputation of the institution
- 112 • Assist in educating high-level management on the impact to the institution
- 113 • Reduce development time and increase adoptability for manufacturers

114 6. REQUIREMENTS

115 1. Medical devices and associated systems

- 116 • Wireless infusion pump
- 117 • Pump server
- 118 • Pump server must be capable of interfacing with at least one of the
- 119 wireless infusion pumps used in the build.

120 Related standards:

- 121 ○ National Institute of Standards and Technology (NIST) Special
- 122 Publication (SP) 800-66, An Introductory Resource Guide for
- 123 Implementing the Health Insurance Portability and Accountability Act
- 124 (HIPAA) Security Rule
- 125 http://www.nist.gov/customcf/get_pdf.cfm?pub_id=890098

126 2. Network

- 127 • Enterprise-grade wireless APs with extended service set capability

128 Related standards:

- 129 ○ FDA, Radio Frequency Wireless Technology in Medical Devices –
- 130 Guidance for Industry and Food and Drug Administration Staff,
- 131 Document issued on August 12, 2013
- 132 [http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationand](http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/ucm077272.pdf)
- 133 [Guidance/GuidanceDocuments/ucm077272.pdf](http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/ucm077272.pdf)
- 134 ○ NIST SP 800-48 Rev 1, Guide to Securing Legacy IEEE 802.11 Wireless
- 135 Networks
- 136 [http://csrc.nist.gov/publications/nistpubs/800-48-rev1/SP800-](http://csrc.nist.gov/publications/nistpubs/800-48-rev1/SP800-48r1.pdf)
- 137 [48r1.pdf](http://csrc.nist.gov/publications/nistpubs/800-48-rev1/SP800-48r1.pdf)
- 138 ○ NIST SP 800-97, Establishing Wireless Robust Security Networks: A
- 139 Guide to IEEE 802.11i
- 140 <http://csrc.nist.gov/publications/nistpubs/800-97/SP800-97.pdf>
- 141 ○ IEEE 802.1x, Port Based Network Access Control
- 142 <http://www.ieee802.org/1/pages/802.1x.html>
- 143 ○ IEEE 802.11, Wireless LAN Medium Access Control (MAC) and Physical
- 144 Layer (PHY) Specifications
- 145 <http://www.ieee802.org/11/>

- 146
- Virtual private networks (VPNs)
- 147 Related standards:
- 148
- NIST SP 800-114, User’s Guide to Securing External Devices for
- 149 Telework and Remote Access
- 150 [http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-](http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-124r1.pdf)
- 151 [124r1.pdf](http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-124r1.pdf)
- 152
- NIST SP 800-46 Rev 1, Guide to Enterprise Telework and Remote
- 153 Access Security
- 154 [http://csrc.nist.gov/publications/nistpubs/800-46-rev1/sp800-](http://csrc.nist.gov/publications/nistpubs/800-46-rev1/sp800-46r1.pdf)
- 155 [46r1.pdf](http://csrc.nist.gov/publications/nistpubs/800-46-rev1/sp800-46r1.pdf)
- 156
- NIST SP 800-77, Guide to IPsec VPNs
- 157 <http://csrc.nist.gov/publications/nistpubs/800-77/sp800-77.pdf>
- 158
- NIST SP 800-52 Rev 1, Guidelines for the Selection, Configuration, and
- 159 Use of Transport Layer Security (TLS) Implementations
- 160 [http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-](http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-52r1.pdf)
- 161 [52r1.pdf](http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-52r1.pdf)
- 162
- Enterprise-grade network components, such as switches/routers
- 163 Related standards:
- 164
- IEEE 802.1x, Port Based Network Access Control
- 165 <http://www.ieee802.org/1/pages/802.1x.html>
- 166
- IEEE 802.3, IEEE Standard for Ethernet
- 167 <http://www.ieee802.org/3/>
- 168
- IEEE 802.1Q, Bridges and Bridged Networks
- 169 <http://www.ieee802.org/1/pages/802.1Q.html>
- 170
- Internet Engineering Task Force (IETF) Request for Comments (RFC)
- 171 4301, Security Architecture for the Internet Protocol
- 172 <https://tools.ietf.org/html/rfc4301>
- 173
- Firewalls
- 174 Related standards:
- 175
- NIST SP 800-41 Rev 1, Guidelines on Firewalls and Firewall Policy
- 176 [http://csrc.nist.gov/publications/nistpubs/800-41-Rev1/sp800-41-](http://csrc.nist.gov/publications/nistpubs/800-41-Rev1/sp800-41-rev1.pdf)
- 177 [rev1.pdf](http://csrc.nist.gov/publications/nistpubs/800-41-Rev1/sp800-41-rev1.pdf)
- 178
- Application gateways
- 179 Related standards:
- 180
- NIST SP 800-95, Guide to Secure Web Services
- 181 <http://csrc.nist.gov/publications/nistpubs/800-95/SP800-95.pdf>

- 182 • Intrusion detection and prevention systems
- 183 Related standards:
- 184 ○ NIST SP 800-94, Guide to Intrusion Detection and Prevention Systems
- 185 (IDPS)
- 186 <http://csrc.nist.gov/publications/nistpubs/800-94/SP800-94.pdf>
- 187 3. IT systems
- 188 • Encryption tools
- 189 Related standards:
- 190 ○ NIST SP 800-111, Guide to Storage Encryption Technologies for End
- 191 User Devices
- 192 <http://csrc.nist.gov/publications/nistpubs/800-111/SP800-111.pdf>
- 193 ○ NIST Federal Information Processing Standards (FIPS) 140-2, Security
- 194 Requirements for Cryptographic Modules
- 195 <http://csrc.nist.gov/groups/STM/cmvp/standards.html>
- 196 ○ NIST FIPS 197, Advanced Encryption Standard (AES)
- 197 <http://csrc.nist.gov/publications/fips/fips197/fips-197.pdf>
- 198 • Patch, password, and configuration management
- 199 Related standards:
- 200 ○ NIST SP 800-118, Guide to Enterprise Password Management (Draft)
- 201 <http://csrc.nist.gov/publications/drafts/800-118/draft-sp800-118.pdf>
- 202 ○ NIST SP 800-40 Rev 3, Guide to Enterprise Patch Management
- 203 Technologies
- 204 [http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-](http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-40r3.pdf)
- 205 [40r3.pdf](http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-40r3.pdf)
- 206 ○ NIST SP 800-53 Rev 4, Recommended Security and Privacy Controls
- 207 for Federal Information Systems and Organizations
- 208 [http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-](http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-53r4.pdf)
- 209 [53r4.pdf](http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-53r4.pdf)
- 210 • Identity management, access control, and credentialing
- 211 Related standards:
- 212 ○ NIST SP 800-32, Introduction to Public Key Technology and the
- 213 Federal PKI Infrastructure
- 214 <http://csrc.nist.gov/publications/nistpubs/800-32/sp800-32.pdf>
- 215 ○ NIST SP 800-57 Part 1 – Rev 3, Recommendation for Key
- 216 Management: Part 1: General (Revision 3)
- 217 [http://csrc.nist.gov/publications/nistpubs/800-57/sp800-](http://csrc.nist.gov/publications/nistpubs/800-57/sp800-57_part1_rev3_general.pdf)
- 218 [57_part1_rev3_general.pdf](http://csrc.nist.gov/publications/nistpubs/800-57/sp800-57_part1_rev3_general.pdf)

- 219 ○ NIST SP 800-57 Part 2, Recommendation for Key Management: Part 2:
220 Best Practices for Key Management Organization
221 <http://csrc.nist.gov/publications/nistpubs/800-57/SP800-57-Part2.pdf>
- 222 ○ NIST SP 800-57 Part 3 Rev 1, Recommendation for Key Management:
223 Part 3: Application-Specific Key Management Guidance
224 <http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-57Pt3r1.pdf>
225
- 226 ● Asset/risk management and monitoring systems
- 227 Related standards:
- 228 ○ NIST SP 800-30, Guide for Conducting Risk Assessments
229 [http://csrc.nist.gov/publications/nistpubs/800-30-](http://csrc.nist.gov/publications/nistpubs/800-30-rev1/sp800_30_r1.pdf)
230 [rev1/sp800_30_r1.pdf](http://csrc.nist.gov/publications/nistpubs/800-30-rev1/sp800_30_r1.pdf)
- 231 ○ NIST SP 800-37, Guide for Applying the Risk Management Framework
232 to Federal Information Systems: A Security Life Cycle Approach
233 [http://csrc.nist.gov/publications/nistpubs/800-37-rev1/sp800-37-](http://csrc.nist.gov/publications/nistpubs/800-37-rev1/sp800-37-rev1-final.pdf)
234 [rev1-final.pdf](http://csrc.nist.gov/publications/nistpubs/800-37-rev1/sp800-37-rev1-final.pdf)
- 235 ○ NIST SP 800-39, Managing Information Security Risk Organization,
236 Mission, and Information System View
237 <http://csrc.nist.gov/publications/nistpubs/800-39/SP800-39-final.pdf>
- 238 ○ American National Standards Institute (ANSI)/Association for the
239 Advancement of Medical Instrumentation (AAMI)/International
240 Electrotechnical Commission (IEC) 80001-1:2010, Application of risk
241 management for IT Networks incorporating medical devices – Part 1:
242 Roles, responsibilities and activities
- 243 ○ IEC Technical Report (TR) 80001-2-1, Edition 1.0 2012-07, TECHNICAL
244 REPORT, Application of risk management for IT-networks
245 incorporating medical devices – Part 2-1: Step-by-step risk
246 management of medical IT-networks – Practical applications and
247 examples
- 248 ○ IEC TR 80001-2-2, Edition 1.0 2012-07, TECHNICAL REPORT,
249 Application of risk management for IT Networks incorporating
250 medical devices – Part 2-2: Guidance for the disclosure and
251 communication of medical device security needs, risks and controls
- 252 ○ IEC TR 80001-2-3, Edition 1.0 2012-07, TECHNICAL REPORT,
253 Application of risk management for IT-networks incorporating
254 medical devices – Part 2-3: Guidance for wireless networks

- 255 ○ IEC TR 80001-2-4, Edition 1.0 2012-11, TECHNICAL REPORT,
256 Application of risk management for IT-networks incorporating
257 medical devices – Part 2-4: Application guidance – General
258 implementation guidance for healthcare delivery organizations
- 259 ○ IEC TR 80001-2-5, Edition 1.0 2014-12, TECHNICAL REPORT,
260 Application of risk management for IT-networks incorporating
261 medical devices – Part 2-5: Application guidance – Guidance on
262 distributed alarm systems

263 **7. SECURITY CONTROL MAP**

264 This table begins to map the security characteristics of the products that the NCCoE will
265 apply to this cybersecurity challenge. It utilizes the Framework for Improving Critical
266 Infrastructure Cybersecurity (CSF), other NIST activities, and sector-specific standards
267 such as HIPAA. This initial mapping is meant to demonstrate the real-world applicability
268 of standards and best practices, but does not imply that products with these
269 characteristics will meet requirements for regulatory approval or accreditation.
270

Example Characteristic (Based on IEC TR 80001-2-2)		Cybersecurity Standards & Best Practices			Sector-Specific Standards & Best Practices
Security Characteristics	Example Capability	CSF Function	CSF Category	CSF Subcategory	IEC TR 80001-2-2
Automatic logoff	Reduce the RISK of unauthorized access to HEALTH DATA from an unattended workstation. Prevent misuse by other users if a system or workstation is left idle for a period of time. Prevent access to device/system configuration data and settings.	PROTECT (PR)	Access Control (PR.AC)		ALOF
Audit controls	Define harmonized approach toward reliably auditing who is doing what with HEALTH DATA and device access, allowing the Healthcare Delivery Organization IT to monitor this using public frameworks, standards, and technology.	PROTECT (PR)	Data Security (PR.DS)	PR.DS-4	AUDT
			Protective Technology (PR.PT)	PR.PT-1	
		DETECT (DE)	Anomalies and Events (DE.AE)	DE.AE-2, DE.AE-3	
			Security Continuous Monitoring (DE.CM)	DE.CM-1, DE.CM-3, DE.CM-7	
			Detection Processes (DE.DP)	DE.DP-4	
		RESPOND (RS)	Communications (RS.CO)	RS.CO-2	
Analysis (RS.AN)	RS.AN-1, RS.AN-3				
Authorization	Following the principle of data minimization and least privilege, provide control of access to HEALTH DATA and functions only as necessary to perform the tasks required by the HDO consistent with the INTENDED USE.	PROTECT (PR)	Access Control (PR.AC)	PR.AC-1, PR.AC-4	AUTH
			Data Security (PR.DS)	PR.DS-5	
			Information Protection Processes and Procedures (PR.IP)	PR.IP-3	
			Protective Technology (PR.PT)	PR.PT-3	
			Anomalies and Events (DE.AE)	DE.AE-1	
			Security Continuous Monitoring (DE.CM)	DE.CM-1, DE.CM-3	
Configuration of security features	Allow the HDO to determine how to utilize the product SECURITY CAPABILITIES to meet their needs for policy and/or workflow.	PROTECT (PR)	Access Control (PR.AC)	PR.AC-1, PR.AC-4	CNFS
			Data Security (PR.DS)	PR.DS-5, PR.DS-7	
			Information Protection Processes and Procedures (PR.IP)	PR.IP-1, PR.IP-3	
			Protective Technology (PR.PT)	PR.PT-3	
		DETECT (DE)	Anomalies and Events (DE.AE)	DE.AE-1	
			Security Continuous Monitoring (DE.CM)	DE.CM-1, DE.CM-3	
Cyber security product upgrades	Create a unified way of working. Secure installation / upgrade of product security patches by on-site service staff, remote service staff, and possibly authorized HDO staff (downloadable patches).	PROTECT (PR)	Information Protection Processes and Procedures (PR.IP)	PR.IP-1, PR.IP-3	CSUP
		PROTECT (PR)	Maintenance (PR.MA)	PR.MA-1, PR.MA-2	

Example Characteristic (Based on IEC TR 80001-2-2)		Cybersecurity Standards & Best Practices			Sector-Specific Standards & Best Practices
Security Characteristics	Example Capability	CSF Function	CSF Category	CSF Subcategory	IEC TR 80001-2-2
Data backup and disaster recovery	Ensure that the health care provider can continue business after damage or destruction of data, hardware, or software.	IDENTIFY (ID)	Asset Management (ID.AM)	ID.AM-5, ID.AM-6	DTBK
			Business Environment (ID.BE)	ID.BE-1, ID.BE-4, ID.BE-5	
		PROTECT (PR)	Data Security (PR.DS)	PR.DS-4	
			Information Protection Processes and Procedures (PR.IP)	PR.IP-4, PR.IP-7, PR.IP-9, PR.IP-10	
			Protective Technology (PR.PT)	PR.PT-4	
		DETECT (DE)	Anomalies and Events (DE.AE)	DE.AE-2, DE.AE-3, DE.AE-4, DE.AE-5	
		RESPOND (RS)	Analysis (RS.AN)	RS.AN-1, RS.AN-2, RS.AN-3, RS.AN-4	
			Response Planning (RS.RP)	RS.CO-1, RS.CO-2, RS.CO-3, RS.CO-4	
			Improvements (RS.IM)	RS.IM-1, RS.IM-2	
			Mitigation (RS.MI)	RS.MI-1, RS.MI-2	
		RECOVER (RC)	Response Planning (RS.RP)	RS.RP-1	
Communications (RC.CO)	RC.CO-3				
RECOVER (RC)	Recovery Planning (RC.RP)	RC.RP-1			
Emergency access	Ensure that access to protected HEALTH DATA is possible in case of an emergency or disaster situation requiring immediate access to stored HEALTH DATA.	PROTECT (PR)	Access Control (PR.AC)	PR.AC-1, PR.AC-4	EMRG
			Security Continuous Monitoring (DE.CM)	DE.CM-1, DE.CM-3	
HEALTH DATA de-identification	Ability of equipment (application software or additional tooling) to directly remove information that allows identification of PATIENT. Data scrubbing prior to shipping back to factory; architecting to allow remote service without HEALTH DATA access/exposure; in-factory quarantine, labelling, and training.	PROTECT (PR)	Information Protection Processes and Procedures (PR.IP)	PR.IP-6, PR.IP-8	DIDT
HEALTH DATA integrity and authenticity	Ensure that HEALTH DATA has not been altered or destroyed in nonauthorized manner and is from the originator. Ensure integrity of HEALTH DATA, including protection from unauthorized remote access and remote programming.	PROTECT (PR)	Data Security (PR.DS)	PR.DS-1, PR.DS-2, PR.DS-6	IGAU
		DETECT (DE)	Security Continuous Monitoring (DE.CM)	DE.CM-4	
			Detection Processes (DE.DP)	DE.DP-3	

Example Characteristic (Based on IEC TR 80001-2-2)		Cybersecurity Standards & Best Practices			Sector-Specific Standards & Best Practices
Security Characteristics	Example Capability	CSF Function	CSF Category	CSF Subcategory	IEC TR 80001-2-2
Malware detection/protection	Product supports regulatory, HDO, and user needs in ensuring an effective and uniform support for the prevention, detection, and removal of malware. This is an essential step in a proper defense-in-depth approach to security.	PROTECT (PR)	Information Protection Processes and Procedures (PR.IP)	PR.IP-7, PR.IP-12	MLDP
		DETECT (DE)	Security Continuous Monitoring (DE.CM)	DE.CM-1, DE.CM-2, DE.CM-3, DE.CM-4	
Node authentication	Authentication policies need to be flexible to adapt to local HDO IT policy. As necessary, use node authentication when communicating HEALTH DATA.	PROTECT (PR)	Access Control (PR.AC)	PR.AC-3, PR.AC-4, PR.AC-5	NAUT
Person authentication	Authentication policies need to be flexible to adapt to HDO IT policy. This requirement is a logical place to require person authentication when providing access to HEALTH DATA. To control access to devices, network resources, and HEALTH DATA and to generate non-repudiable audit trails. This feature should be able to identify unambiguously and with certainty the individual who is accessing the network, device, or resource. This feature should be consistent with emergency/disaster situations identified above.	PROTECT (PR)	Access Control (PR.AC)	PR.AC-1, PR.AC-3, PR.AC-4	PAUT
Physical locks on device	Ensure that unauthorized access does not compromise the system or data confidentiality, integrity, and availability.	PROTECT (PR)	Access Control (PR.AC)	PR.AC-2	PLOK
Security guides	Ensure that security guidance for OPERATORS and administrators of the system is available. Separate manuals for OPERATORS and administrators (including Medical Device Manufacturer sales and service) are desirable, as they allow understanding of full administrative functions to be kept only by administrators.	Can be mapped to multiple places as this is for OPERATORS and administrators			SGUD
System and application hardening	Adjust security controls on the MEDICAL DEVICE and/or software applications such that security is maximized (“hardened”) while maintaining INTENDED USE. Minimize attack vectors and overall attack surface area via port closing, service removal, etc.	PROTECT (PR)	Information Protection Processes and Procedures (PR.IP)	PR.IP-1, PR.IP-2	SAHD
Third-party components in product	Goal is to proactively manage impact of life cycle of components throughout a product’s full life cycle. This	IDENTIFY (ID)	Business Environment (ID.BE)	ID.BE-1	RDMP
			Risk Assessment (ID.RA)	ID.RA-1	

Example Characteristic (Based on IEC TR 80001-2-2)		Cybersecurity Standards & Best Practices			Sector-Specific Standards & Best Practices
Security Characteristics	Example Capability	CSF Function	CSF Category	CSF Subcategory	IEC TR 80001-2-2
lifecycle roadmaps	commercial off-the-shelf or 3rd party software includes operating systems, database systems, report generators, Medical Imaging Processing components, etc. (assumption is that existing Product Creation Process already manages hardware component obsolescence). 3rd party includes here also internal suppliers of security vulnerable components with own life cycle and support programs.	PROTECT (PR)	Awareness and Training (PR.AT)	PR.AT-3	
			Maintenance (PR.MA)	PR.MA-1	
			Information Protection Processes and Procedures (PR.IP)	PR.IP-1, PR.IP-2, PR.IP-3	
		DETECT (DE)	Security Continuous Monitoring (DE.CM)	DE.CM-6	
HEALTH DATA storage confidentiality	MDM establishes technical controls to mitigate the potential for compromise to the integrity and confidentiality of HEALTH DATA stored on products or removable media.	PROTECT (PR)	Data Security (PR.DS)	PR.DS-1, PR.DS-5	STCF
Transmission confidentiality	MANUFACTURER demonstrates that its equipment meets multiple national standards or regulations (USA HIPAA, EU 95/46/EC, HBP 517, etc.) according to HDO needs to ensure the confidentiality of transmitted HEALTH DATA.	PROTECT (PR)	Access Control (PR.AC)	PR.AC-2	TXCF
			Data Security (PR.DS)	PR.DS-2, PR.DS-5	
Transmission integrity	System/device protects the integrity of transmitted HEALTH DATA.	PROTECT (PR)	Access Control (PR.AC)	PR.AC-2	TXIG
			Data Security (PR.DS)	PR.DS-5	
		DETECT (DE)	Security Continuous Monitoring (DE.CM)	DE.CM-4	
			Detection Processes (DE.DP)	DE.DP-3	

271
272

273 **APPENDIX: OTHER RELEVANT REGULATIONS, STANDARDS, AND GUIDANCE**

274 The following is a list of standards, guidance, and directives regarding cybersecurity in
275 the medical device and health care domain. It includes NIST and international standards
276 and guidance on cybersecurity best practices.

277 **Regulations**

- 278 • FDA, Content of Premarket Submissions for Management of Cybersecurity in
279 Medical Devices - Guidance for Industry and Food and Drug Administration Staff,
280 Document Issued on: October 2, 2014
281 <http://www.fda.gov/downloads/medicaldevices/deviceregulationandguidance/guidancedocuments/ucm356190.pdf>
282

- 283 • FDA, Guidance for Industry - Cybersecurity for Networked Medical Devices
284 Containing Off-the-Shelf (OTS) Software
285 <http://www.fda.gov/downloads/MedicalDevices/DeviceRegulationandGuidance/GuidanceDocuments/ucm077823.pdf>
286

- 287 • FDA, Infusion Pumps Total Product Life Cycle - Guidance for Industry and FDA
288 Staff, Document issued on: December 2, 2014
289 <http://www.fda.gov/downloads/medicaldevices/deviceregulationandguidance/guidancedocuments/ucm209337.pdf>
290

291 **Health Care / Medical Devices Specific (International Organization for Standardization [ISO]/IEC, IHE)**

- 293 • Department of Homeland Security (DHS), Attack Surface: Healthcare and Public
294 Health Sector
295 <https://info.publicintelligence.net/NCCIC-MedicalDevices.pdf>

- 296 • Health Insurance Portability and Accountability Act (HIPAA) Security Rule
297 <http://www.hipaasurvivalguide.com/hipaa-regulations/hipaa-regulations.php>

- 298 • Department of Health and Human Services (HHS) HIPAA Administrative
299 Simplification Statute and Rules
300 <http://www.hhs.gov/ocr/privacy/hipaa/administrative/index.html>

- 301 • Integrating the Healthcare Enterprise (IHE) Patient Care Device (PCD), Technical
302 Framework White Paper
303 http://www.ihe.net/Technical_Framework/upload/IHE_PCD_Medical-Equipment-Management_MEM_White-Paper_V1-0_2009-09-01.pdf
304

- 305 • IHE PCD, White Paper, Medical Equipment Management (MEM): Cyber Security
306 http://www.ihe.net/Technical_Framework/upload/IHE_PCD_White-Paper_MEM_Cyber_Security_Rev2-0_2011-05-27.pdf
307

- 308 • IHE PCD, White Paper, MEM: Medical Device Cyber Security – Best Practice
309 Guide [http://www.ihe.net/uploadedFiles/Documents/PCD/IHE_PCD_WP_Cyber-
311 Security_Rev1.1_2015-10-14.pdf](http://www.ihe.net/uploadedFiles/Documents/PCD/IHE_PCD_WP_Cyber-
310 Security_Rev1.1_2015-10-14.pdf)
- 311 • IHE PCD, Technical Framework, Volume 1, 10 IHE PCD TF-1 Profiles
312 http://www.ihe.net/uploadedFiles/Documents/PCD/IHE_PCD_TF_Vol1.pdf
- 313 • IHE PCD, Technical Framework, Volume 2, IHE PCD TF-2, Transactions
314 http://www.ihe.net/uploadedFiles/Documents/PCD/IHE_PCD_TF_Vol2.pdf
- 315 • IHE PCD User Handbook – 2011 Edition – Published 2011-08-12
316 [http://www.ihe.net/Technical_Framework/upload/IHE_PCD_User_Handbook_2
318 011_Edition.pdf](http://www.ihe.net/Technical_Framework/upload/IHE_PCD_User_Handbook_2
317 011_Edition.pdf)
- 318 • Department of Veterans Affairs (VA), Medical Device Isolation Architecture
319 Guide 2009
320 [http://s3.amazonaws.com/rdcms-
323 himss/files/production/public/HIMSSorg/Content/files/MedicalDeviceIsolationA
324 rchitectureGuidev2.pdf](http://s3.amazonaws.com/rdcms-
321 himss/files/production/public/HIMSSorg/Content/files/MedicalDeviceIsolationA
322 rchitectureGuidev2.pdf)

323 **General Cybersecurity / Risk Management (ISO/IEC, NIST)**

- 324 • NIST Cybersecurity Framework - Standards, guidelines, and best practices to
325 promote the protection of critical infrastructure
326 <http://www.nist.gov/itl/cyberframework.cfm>

- 327 • NIST SP 800-160, Systems Security Engineering, An Integrated Approach to
328 Building Trustworthy Resilient Systems
329 http://csrc.nist.gov/publications/drafts/800-160/sp800_160_draft.pdf

- 330 • SANS 20 Critical Security Controls
331 <http://www.sans.org/critical-security-controls/>