

Manufacturer Disclosure Statement for Medical Device Security – MDS²

DEVICE DESCRIPTION

Device Category	Manufacturer	Document ID	Document Release Date
Class II	Vital Images, Inc.	VLC-10323	22-Nov-19
Device Model	Software Revision		Software Release Date
Vitreva Advanced Visualization	7.12		24-Jan-20
Manufacturer or Representative Contact Information	Company Name	Manufacturer Contact Information	
	Vital Images, Inc.	5850 Opus Parkway Suite #300, Minnetonka MN 55343	
	Representative Name/Position	952-487-9500	
	Kelly Dumasquier, Senior Product Manager		

Intended use of device in network-connected environment:

Vitreva is a medical diagnostic system that allows the processing, review, analysis, communication, and media interchange of multi-dimensional digital images acquired from a variety of imaging devices. Vitreva is not meant for primary image interpretation in mammography

MANAGEMENT OF PRIVATE DATA

Refer to Section 2.3.2 of this standard for the proper interpretation of information requested in this form.		Yes, No, N/A, or See Note	Note #
A	Can this device display, transmit, or maintain private data (including electronic Protected Health Information [ePHI])?	Yes	1
B	Types of private data elements that can be maintained by the device :		
B.1	Demographic (e.g., name, address, location, unique identification number)?	Yes	—
B.2	Medical record (e.g., medical record #, account #, test or treatment date, device identification number)?	Yes	—
B.3	Diagnostic/therapeutic (e.g., photo/radiograph, test results, or physiologic data with identifying characteristics)?	Yes	—
B.4	Open, unstructured text entered by device user/operator ?	Yes	—
B.5	Biometric data ?	No	—
B.6	Personal financial information?	No	—
C	Maintaining private data - Can the device :		
C.1	Maintain private data temporarily in volatile memory (i.e., until cleared by power-off or reset)?	Yes	1
C.2	Store private data persistently on local media?	Yes	1
C.3	Import/export private data with other systems?	Yes	1
C.4	Maintain private data during power service interruptions?	Yes	1
D	Mechanisms used for the transmitting, importing/exporting of private data – Can the device :		
D.1	Display private data (e.g., video display, etc.)?	Yes	—
D.2	Generate hardcopy reports or images containing private data ?	Yes	—
D.3	Retrieve private data from or record private data to removable media (e.g., disk, DVD, CD-ROM, tape, CF/SD card, memory stick, etc.)?	Yes	1
D.4	Transmit/receive or import/export private data via dedicated cable connection (e.g., IEEE 1073, serial port, USB, FireWire, etc.)?	Yes	1
D.5	Transmit/receive private data via a wired network connection (e.g., LAN, WAN, VPN, intranet, Internet, etc.)?	Yes	1
D.6	Transmit/receive private data via an integrated wireless network connection (e.g., WiFi, Bluetooth, infrared, etc.)?	Yes	1
D.7	Import private data via scanning?	Yes	—
D.8	Other?	N/A	—

Management of Private Data notes: 1. The term “device” herein refers to the Vitreva® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components.

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Vitreia Advanced Visualization	7.12		24-Jan-20	
SECURITY CAPABILITIES				
Refer to Section 2.3.2 of this standard for the proper interpretation of information requested in this form.			Yes, NO, N/A, or See Note	Note #
1	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.			
1-1	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)?		Yes	1
1-1.1	Is the length of inactivity time before auto-logout/screen lock user or administrator configurable? (Indicate time [fixed or configurable range] in notes.)		Yes	2
1-1.2	Can auto-logout/screen lock be manually invoked (e.g., via a shortcut key or proximity sensor, etc.) by the user ?		Yes	3
ALOF notes:	<p>1. The term "device" herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions. Some applications may still be displayed after the session timeout however they will be logged off when they try to interact further with the applications.</p> <p>2. The length of inactivity time before auto-logout has a default of four hours for a user session and 15 min for application inactivity.</p> <p>3. The Vitrea® software supports the Microsoft "Windows logo + L" shortcut key for standard desktop locking.</p>			
2	AUDIT CONTROLS (AUDT)			
	The ability to reliably audit activity on the device .			
2-1	Can the medical device create an audit trail ?		Yes	1
2-2	Indicate which of the following events are recorded in the audit log:			
2-2.1	Login/logout		Yes	1
2-2.2	Display/presentation of data		Yes	1
2-2.3	Creation/modification/deletion of data		No	1
2-2.4	Import/export of data from removable media		No	1
2-2.5	Receipt/transmission of data from/to external (e.g., network) connection		No	2
2-2.5.1	Remote service activity		No	2
2-2.6	Other events? (describe in the notes section)		N/A	—
2-3	Indicate what information is used to identify individual events recorded in the audit log:			
2-3.1	User ID		Yes	1
2-3.2	Date/time		Yes	1
AUDT notes:	<p>1. The Vitrea software can create audit logs that list user actions to ePHI data. ePHI information available to users is in the form of DICOM data and Reports. An audit log is created anytime patient image data is viewed as well as user login/logout.</p> <p>2. The term "device" herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.</p>			
3	AUTHORIZATION (AUTH)			
	The ability of the device to determine the authorization of users.			
3-1	Can the device prevent access to unauthorized users through user login requirements or other mechanism?		Yes	1
3-2	Can users be assigned different privilege levels within an application based on 'roles' (e.g., guests, regular users , power users , administrators, etc.)?		Yes	—
3-3	Can the device owner/ operator obtain unrestricted administrative privileges (e.g., access operating system or application via local root or admin account)?		Yes	1
AUTH notes:	<p>1. The term "device" herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.</p>			

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4	CONFIGURATION OF SECURITY FEATURES (CNFS)			
	The ability to configure/re-configure device security capabilities to meet users' needs.			
4-1	Can the device owner/operator reconfigure product security capabilities ?	Yes	1	
CNFS notes:	1. The term "device" herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.			
5	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.			
5-1	Can relevant OS and device security patches be applied to the device as they become available?	Yes	1, 2	
	5-1.1 Can security patches or other software be installed remotely?	Yes	1	
CSUP notes:	1. Vital Images, Inc. does not provide customers with Anti-Virus Definition Files, Operating System Security or Service Packs. Customer is responsible for managing hardware security and software update policies. 2. The term "device" herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.			
6	HEALTH DATA DE-IDENTIFICATION (DIDT)			
	The ability of the device to directly remove information that allows identification of a person.			
6-1	Does the device provide an integral capability to de-identify private data ?	Yes	1	
DIDT notes:	Vitreva allows de-identification capability using the 'Anonymize' or 'Edit Patient' function when saving the data to media or when sending the data to a different system			
7	DATA BACKUP AND DISASTER RECOVERY (DTBK)			
	The ability to recover after damage or destruction of device data, hardware, or software.			
7-1	Does the device have an integral data backup capability (i.e., backup to remote storage or removable media such as tape, disk)?	No	1	
DTBK notes:	1. The term "device" herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.			
8	EMERGENCY ACCESS (EMRG)			
	The ability of device users to access private data in case of an emergency situation that requires immediate access to stored private data .			
8-1	Does the device incorporate an emergency access ("break-glass") feature?	No	1	
EMRG notes:	1. The term "device" herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.			
9	HEALTH DATA INTEGRITY AND AUTHENTICITY (IGAU)			
	How the device ensures that data processed by the device has not been altered or destroyed in an unauthorized manner and is from the originator.			
9-1	Does the device ensure the integrity of stored data with implicit or explicit error detection/correction technology?	No	1	
IGAU notes:	1. The term "device" herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.			

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10 MALWARE DETECTION/PROTECTION (MLDP)				
The ability of the device to effectively prevent, detect and remove malicious software (malware).				
10-1	Does the device support the use of anti-malware software (or other anti-malware mechanism)?		Yes	1
10-1.1	Can the user independently re-configure anti-malware settings?		N/A	1
10-1.2	Does notification of malware detection occur in the device user interface?		N/A	1
10-1.3	Can only manufacturer-authorized persons repair systems when malware has been detected?		N/A	1
10-2	Can the device owner install or update anti-virus software ?		Yes	1
10-3	Can the device owner/ operator (technically/physically) update virus definitions on manufacturer-installed anti-virus software ?		Yes	1
MLDP notes:	1. Vital Images, Inc. does not provide customers with Anti-Virus Definition Files, Operating System Security or Service Packs. Customer is responsible for managing hardware security and software update policies.			
11 NODE AUTHENTICATION (NAUT)				
The ability of the device to authenticate communication partners/nodes.				
11-1	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?		Yes	1
NAUT notes:	1. The term “device” herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.			
12 PERSON AUTHENTICATION (PAUT)				
Ability of the device to authenticate users				
12-1	Does the device support user/operator -specific username(s) and password(s) for at least one user ?		Yes	1
12-1.1	Does the device support unique user/operator -specific IDs and passwords for multiple users?		Yes	1
12-2	Can the device be configured to authenticate users through an external authentication service (e.g., MS Active Directory, NDS, LDAP, etc.)?		Yes	1
12-3	Can the device be configured to lock out a user after a certain number of unsuccessful logon attempts?		N/A	1
12-4	Can default passwords be changed at/prior to installation?		Yes	1
12-5	Are any shared user IDs used in this system?		No	—
12-6	Can the device be configured to enforce creation of user account passwords that meet established complexity rules?		Yes	1
12-7	Can the device be configured so that account passwords expire periodically?		N/A	1
PAUT notes:	1. The term “device” herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.			
13 PHYSICAL LOCKS (PLOK)				
Physical locks can prevent unauthorized users with physical access to the device from compromising the integrity and confidentiality of private data stored on the device or on removable media .				
13-1	Are all device components maintaining private data (other than removable media) physically secure (i.e., cannot remove without tools)?		N/A	1
PLOK notes:	1. The term “device” herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.			

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14	ROADMAP FOR THIRD PARTY COMPONENTS IN DEVICE LIFE CYCLE (RDMP)				
	Manufacturer's plans for security support of 3rd party components within device life cycle.				
14-1	In the notes section, list the provided or required (separately purchased and/or delivered) operating system(s) - including version number(s).			See Note	1
14-2	Is a list of other third party applications provided by the manufacturer available?			Yes	—
RDMP notes:	Microsoft Windows Server 2012 R2 Enterprise Microsoft Windows 7 Professional 64-bit Edition with SP1 Microsoft Windows 8.1 Professional 64-bit Microsoft Windows 10 Microsoft Windows Server 2016 Microsoft Windows Server 2019				
15	SYSTEM AND APPLICATION HARDENING (SAHD)				
	The device's resistance to cyber attacks and malware .				
15-1	Does the device employ any hardening measures? Please indicate in the notes the level of conformance to any industry-recognized hardening standards.			Yes	1, 2
15-2	Does the device employ any mechanism (e.g., release-specific hash key, checksums, etc.) to ensure the installed program/update is the manufacturer-authorized program or software update?			Yes	3
15-3	Does the device have external communication capability (e.g., network, modem, etc.)?			Yes	3
15-4	Does the file system allow the implementation of file-level access controls (e.g., New Technology File System (NTFS) for MS Windows platforms)?			Yes	3
15-5	Are all accounts which are not required for the intended use of the device disabled or deleted, for both users and applications?			Yes	3
15-6	Are all shared resources (e.g., file shares) which are not required for the intended use of the device , disabled?			Yes	3
15-7	Are all communication ports which are not required for the intended use of the device closed/disabled?			Yes	3
15-8	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	3
15-9	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?			No	3
15-10	Can the device boot from uncontrolled or removable media (i.e., a source other than an internal drive or memory component)?			Yes	3
15-11	Can software or hardware not authorized by the device manufacturer be installed on the device without the use of tools?			Yes	3
SAHD notes:	1. The Vitrea software implements a Kiosk mode for the client user which prevents access to system desktop and user options. 2. Conformance: Vulnerability Monitoring & Response process results in immediate patch testing and remediation/mitigation procedures. The Vitrea software is analyzed against RMF/ATO DoD A&A standards. 3. The term "device" herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or				
16	SECURITY GUIDANCE (SGUD)				
	The availability of security guidance for operator and administrator of the system and manufacturer sales and service.				
16-1	Are security-related features documented for the device user ?			Yes	1
16-2	Are instructions available for device/media sanitization (i.e., instructions for how to achieve the permanent deletion of personal or other sensitive data)?			Yes	1
SGUD notes:	1. The term "device" herein refers to the Vitrea® software and /or license. Vital Images does not manufacture hardware or operating system software and /or components which may extend these functions.				

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Note #			
17 HEALTH DATA STORAGE CONFIDENTIALITY (STCF)			
The ability of the device to ensure unauthorized access does not compromise the integrity and confidentiality of private data stored on device or removable media .			
17-1	Can the device encrypt data at rest?	No	—
STCF notes:			
18 TRANSMISSION CONFIDENTIALITY (TXCF)			
The ability of the device to ensure the confidentiality of transmitted private data .			
18-1	Can private data be transmitted only via a point-to-point dedicated cable?	N/A	—
18-2	Is private data encrypted prior to transmission via a network or removable media ? (If yes, indicate in the notes which encryption standard is implemented.)	No	—
18-3	Is private data transmission restricted to a fixed list of network destinations?	No	—
TXCF notes:			
19 TRANSMISSION INTEGRITY (TXIG)			
The ability of the device to ensure the integrity of transmitted private data .			
19-1	Does the device support any mechanism intended to ensure data is not modified during transmission? (If yes, describe in the notes section how this is achieved.)	No	
TXIG notes:			
20 OTHER SECURITY CONSIDERATIONS (OTHR)			
Additional security considerations/notes regarding medical device security.			
20-1	Can the device be serviced remotely?	Yes	1
20-2	Can the device restrict remote access to/from specified devices or users or network locations (e.g., specific IP addresses)?	Yes	1
20-2.1	Can the device be configured to require the local user to accept or initiate remote access?	Yes	1
1. Vital Images, Inc. Technical Support can use WebEx, Bomgar or VPN for remote application (Vitreva) support			
OTHR notes:			