



# 62A/1384/CD

COMMITTEE DRAFT (CD)

PROJECT NUMBER: <b>IEC 80001-5-1 ED1</b>	
DATE OF CIRCULATION: <b>2020-01-31</b>	CLOSING DATE FOR COMMENTS: <b>2020-04-24</b>
SUPERSEDES DOCUMENTS: <b>62A/1360/CD,62A/1375A/CC</b>	

IEC SC 62A : COMMON ASPECTS OF ELECTRICAL EQUIPMENT USED IN MEDICAL PRACTICE	
SECRETARIAT: United States of America	SECRETARY: Ms Hae Choe
OF INTEREST TO THE FOLLOWING COMMITTEES: TC 62,SC 62B,SC 62C,SC 62D	PROPOSED HORIZONTAL STANDARD: <input type="checkbox"/> Other TC/SCs are requested to indicate their interest, if any, in this CD to the secretary.
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This document is still under study and subject to change. It should not be used for reference purposes.

Recipients of this document are invited to submit, with their comments, notification of any relevant patent rights of which they are aware and to provide supporting documentation.

TITLE: <b>Safety, security and effectiveness in the implementation and use of connected medical devices or connected health software - Part 5-1: Security - Activities in the product lifecycle</b>
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NOTE FROM TC/SC OFFICERS:
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## INTERNATIONAL ELECTROTECHNICAL COMMISSION

**Safety, security and effectiveness in the implementation and use of  
connected medical devices or connected health software****Part 5: Security****Part 5-1: Security - Activities in the product lifecycle**

## FOREWORD

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This Committee Draft of future International Standard IEC 80001-5-1 has been prepared by subcommittee 62A/JWG7 of IEC technical committee 62 and ISO/TC 215/JWG 7.

Full information on the voting for the approval of this International Standard can be found in the report on voting indicated in the above table.

This document has been drafted in accordance with the ISO/IEC Directives, Part 2.

The committee has decided that the contents of this document will remain unchanged until the stability date indicated on the IEC website under "<http://webstore.iec.ch>" in the data related to the specific document. At this date, the document will be

- reconfirmed,
- withdrawn,
- replaced by a revised edition, or
- amended.

<p>The National Committees are requested to note that for this document the stability date is 2026 THIS TEXT IS INCLUDED FOR THE INFORMATION OF THE NATIONAL COMMITTEES AND WILL BE DELETED AT THE PUBLICATION STAGE.</p>
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181

## Introduction

182 This International Standard specifies supplementary activities that the MANUFACTURER of Health  
183 Software – including software incorporated in MEDICAL DEVICES – shall perform towards the  
184 information SECURITY of the HEALTH SOFTWARE product / MEDICAL DEVICE.

The project number and title of IEC 80001-5-1 are subject to an ongoing discussion on aligning numbers of several work items of JWG7. A new numbering scheme should systematically reflect the purpose and scope of respective work items. Please note that during the next draft stage, this project may have an updated number and title.

185

186 PROCESS requirements have been derived from IEC 62443-4-1 Product LIFECYCLE Management.  
187 Implementations of these specifications will extend existing PROCESSES at the MANUFACTURER'S  
188 organization –notably existing PROCESSES conforming to IEC 62304.

189

190 This document specifies activities for HEALTH SOFTWARE, the lifecycle of which can be part of  
191 an incorporating *product* project. Some activities specified in this document depend on input  
192 and support from the *product* LIFECYCLE (for example to define specific criteria). Examples  
193 include:

- 194 • RISK MANAGEMENT
- 195 • Requirements
- 196 • Testing
- 197 • Post-Market

198 In cases where activities for HEALTH SOFTWARE need support from PROCESSES at the product  
199 level, this document specifies respective requirements beyond the HEALTH SOFTWARE  
200 LIFECYCLE.

201 Similar to IEC 62304 this document does not prescribe a specific system of processes, but it  
202 requires that certain activities are being performed during the HEALTH SOFTWARE LIFECYCLE.

203 Chapter four specifies supporting activities in the HEALTH SOFTWARE LIFECYCLE.

204 Chapters five to eight specify activities and resulting output as part of the software LIFECYCLE  
205 PROCESS implemented by the MANUFACTURER. These specifications are arranged in the ordering  
206 of IEC 62304.

207 Chapter nine and ten specify activities and resulting output as part of the problem resolution  
208 PROCESS and quality management system respectively, implemented by the MANUFACTURER.

209 The scope of this document is limited to HEALTH SOFTWARE and its connectivity to its INTENDED  
210 ENVIRONMENT OF USE, based on IEC 62304, but with emphasis on information SECURITY.

211 This document is intended to supply minimum best practices towards secure software  
212 LIFECYCLE. Local legislation and regulation have to be considered.

213 This document requires establishing one or more PROCESSES that comprise of identified  
214 activities. The LIFECYCLE PROCESSES shall implement these activities. None of the requirements  
215 in this document requires to implement these activities as one single PROCESS or as separate  
216 PROCESSES.

217

218 Note: HEALTH SOFTWARE can be placed on the market as software or, incorporated into MEDICAL  
219 DEVICES or as software that in itself is considered a MEDICAL DEVICE, or incorporated into a  
220 general-purpose computing platforms.

# Safety, security and effectiveness in the implementation and use of connected medical devices or connected health software

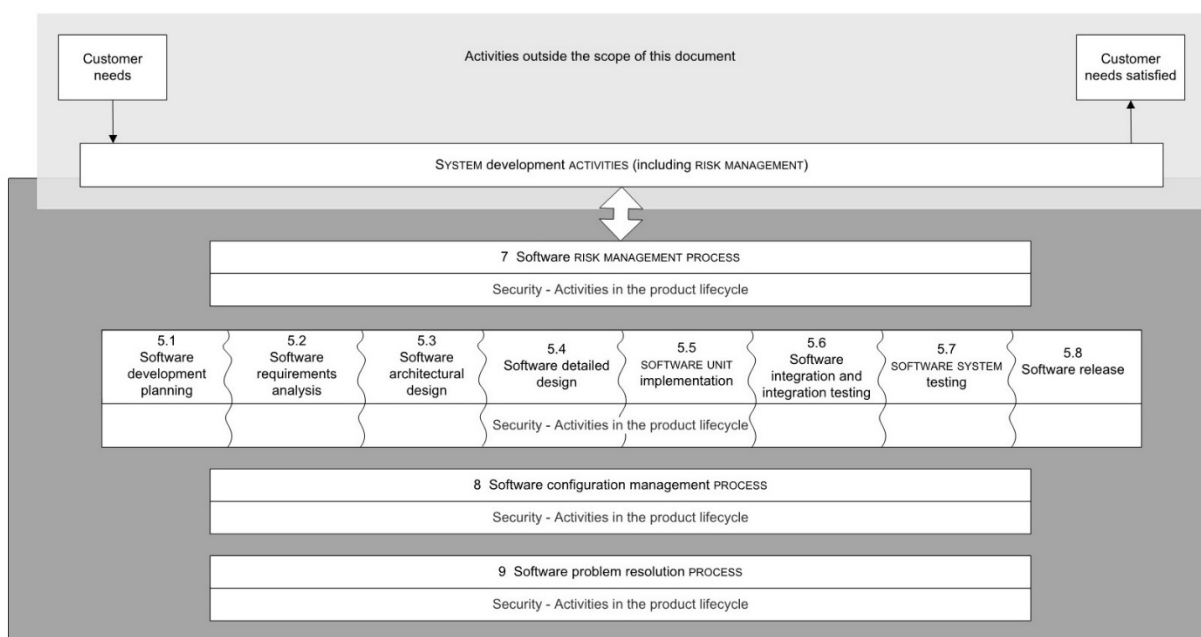
## Part 5: Security

### Part 5-1: Security - Activities in the product lifecycle

## 1 Scope

### 1.1 \* Purpose

This document defines the secure LIFECYCLE requirements for development and MAINTENANCE of HEALTH SOFTWARE. The set of PROCESSES, activities, and tasks described in this document establishes a common framework for secure HEALTH SOFTWARE LIFECYCLE PROCESSES.



**Fig. 1: HEALTH SOFTWARE LIFECYCLE Processes (derived from IEC 62304)**

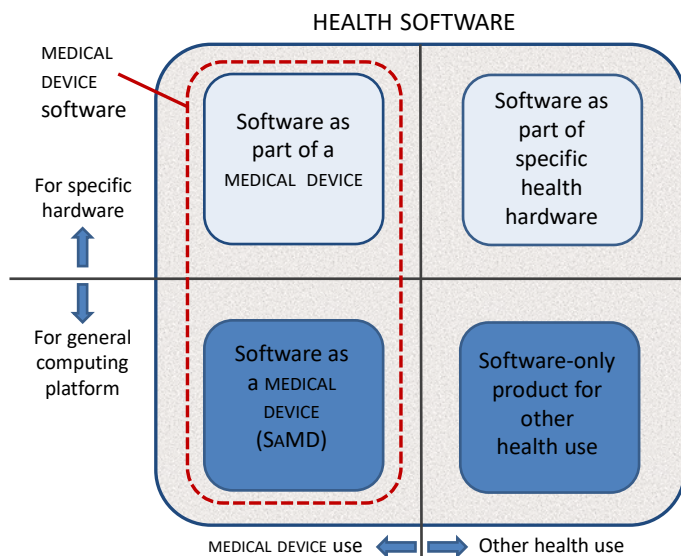
The purpose is to increase the information SECURITY of HEALTH SOFTWARE by establishing certain activities and tasks in the HEALTH SOFTWARE LIFECYCLE PROCESSES and also by increasing the SECURITY of SOFTWARE LIFECYCLE PROCESSES themselves.

This document excludes specification of ACCOMPANYING DOCUMENT contents.

### 1.2 \* Field of application

This document applies to the development and MAINTENANCE of HEALTH SOFTWARE by a MANUFACTURER. MEDICAL DEVICE software is a subset of HEALTH SOFTWARE. Therefore, this document applies to:

- Software as part of a MEDICAL DEVICE;
- Software as part of specific health hardware;
- Software as a MEDICAL DEVICE (SaMD);
- Software-only product for other health use.



250 –

251 **Fig. 2: HEALTH SOFTWARE field of application (source: IEC 62304 Ed 2)**

252

253 **2 Normative references**

254 There are no normative references in this document.

255

256 **3 Terms and definitions**257 ISO and IEC maintain terminological databases for use in standardization at the following  
258 addresses:

- 259 • IEC Electropedia: available at <http://www.electropedia.org/>
- 260 • ISO Online browsing platform: available at <http://www.iso.org/obp>

261

262 Unless stated otherwise, definitions are aligned with ISO 81001-1.

263

264 **3.1**265 **ACCOMPANYING DOCUMENT**

266 document accompanying a HEALTH SOFTWARE and HEALTH IT SYSTEM or an accessory,  
267 containing information for the responsible organization or operator, particularly regarding  
268 SAFETY

269 [SOURCE: ISO 81001-1:202x, 3.1]

270

271 **3.2**272 **ARCHITECTURE**

273 organizational structure of a SYSTEM or component

274 [SOURCE: IEEE Std 24765-2010, 3.150, definition 2]

275



276 **3.3**277 **ASSET**

278 physical or digital entity that has value to an individual, an organization or a government

279 [SOURCE: ISO 81001-1:202x, 3.3]

280

281 **3.4**282 **ATTACK**

283 attempt to destroy, expose, alter, disable, steal or gain unauthorized access to or make  
284 unauthorized use of an ASSET

285 [SOURCE: ISO/IEC 27000:2016, 2.3]

286

287 **3.5**288 **AUDIT LOG**

289 Chronological sequence of audit records, each of which contains data about a specific event..

290 Note to entry: Audit logs are used to protect against claims that repudiate responsibility for an  
291 action.

292 [SOURCE: ISO/IEC 27789:2013, modified – added note to entry ]

293

294 **3.6**295 **AUDIT RECORD**

296 record of the resources which were accessed and/or used by whom

297

298 **3.7**299 **AVAILABILITY**

300 property of being accessible and usable upon demand by an authorized entity

301 [SOURCE: ISO/IEC 27000:2016, 2.9]

302

303 **3.8**304 **CONFIDENTIALITY**

305 property that information is not made available or disclosed to unauthorized individuals, entities,  
306 or PROCESSES

307 [SOURCE: ISO/IEC 24767-1:2008, 2.1.2]

308

309 **3.9**310 **EXPLOIT (noun)**

311 defined way to breach the SECURITY of information systems through some VULNERABILITY

312 [SOURCE: ISO/IEC 27039:2015]

313

314 **3.10**315 **HEALTH IT INFRASTRUCTURE**

316 combined set of IT ASSETS available to the individual or organization for developing, configuring,  
317 integrating, maintaining, and using IT services and supporting health, patient care and other  
318 organizational objectives.

319 Note 1 to entry: As per the definition for ASSET this can include the following:

320 a) data and information;

321 b) HEALTH SOFTWARE (including software in/as a MEDICAL DEVICES, health applications,  
322 middleware, and operating system software);

323 c) hardware components such as computers, mobile devices, servers, databases, and  
324 networks;

325 d) services, including SECURITY, software development, IT operations and externally provided  
326 services such as data centres, internet and software-as-a-service and cloud solutions;

327 e) people, and their qualifications, skills and experience;

328 f) technical procedures and documentation to manage and support the HEALTH IT  
329 INFRASTRUCTURE;

330 g) HEALTH IT SYSTEMS that are configured and implemented to address organizational objectives  
331 by leveraging the ASSETS;

332 h) intangibles, such as reputation and image.

333 [SOURCE: ISO 81001-1:202x, 3.21]

334

335 **3.11**336 **HEALTH IT SYSTEM**

337 a combination of interacting health information elements (including HEALTH SOFTWARE, MEDICAL  
338 DEVICES, IT hardware, interfaces, data, procedures and documentation) that is configured and  
339 implemented to support and enable an individual or organization's specific health objectives.

340 [SOURCE: ISO 81001-1:202x, 3.22]

341

342 **3.12**343 **HEALTH SOFTWARE**

344 software intended to be used specifically for managing, maintaining, or improving health of  
345 individual persons, or the delivery of care, or which has been developed for the purpose of  
346 being incorporated into a MEDICAL DEVICE.

347 Note 1 to entry: HEALTH SOFTWARE fully includes what is considered software as a MEDICAL  
348 DEVICE.

349 [SOURCE: ISO 81001-1:202x, 3.23]

350

351 **3.13**352 **HEALTHCARE DELIVERY ORGANIZATION**353 **HDO**

354 facility or enterprise such as a clinic or hospital that provides healthcare services

355 [SOURCE: ISO 81001-1:202x, 3.24]

356

357 **3.14**358 **INTEGRITY**

359 property of accuracy and completeness

360 [SOURCE: ISO/IEC 27000:2016, 2.40]

361

362 **3.15**363 **INTENDED ENVIRONMENT OF USE**364 conditions and setting in which users interact with the HEALTH SOFTWARE – as specified by the  
365 MANUFACTURER

366

367 **3.16**368 **INTENDED USE**369 **INTENDED PURPOSE**370 use for which a PRODUCT, PROCESS or service is intended according to the specifications,  
371 instructions and information provided by the MANUFACTURER372 Note 1 to entry: The intended medical indication, patient population, part of the body or type of  
373 tissue interacted with, user profile, INTENDED ENVIRONMENT OF USE, and operating principle are  
374 typical elements of the intended use.375 [SOURCE: ISO 81001-1:202x, 3.28, note 1 to entry modified – “use environment” replaced by  
376 “INTENDED ENVIRONMENT OF USE”.]

377

378 **3.17**379 **LEGACY SOFTWARE**380 HEALTH SOFTWARE placed on the market before the publication of this document for which the  
381 MANUFACTURER seeks conformance retrospectively.

382

383 **3.18**384 **LIFE CYCLE**385 series of all phases in the life of a product or system, from the initial conception to final  
386 decommissioning and disposal

387 [SOURCE: ISO 81001-1:202x, 3.32]

388

389 **3.19**390 **MANUFACTURER**391 natural or legal person with responsibility for the design and/or manufacture of HEALTH  
392 SOFTWARE, MEDICAL DEVICES or HEALTH IT SYSTEMS with the intention of making them available  
393 for use, under his name, whether or not such a HEALTH SOFTWARE, MEDICAL DEVICE or HEALTH  
394 IT SYSTEMS is designed and/or manufactured by that person himself or on his behalf by another  
395 person(s)396 Note 1 to entry: The natural or legal person has ultimate legal responsibility for ensuring  
397 compliance with all applicable regulatory requirements for the MEDICAL DEVICE in the countries  
398 or jurisdictions where it is intended to be made available or sold, unless this responsibility is  
399 specifically imposed on another person by the Regulatory Authority (RA) within that jurisdiction.

400 Note 2 to entry: The MANUFACTURER's responsibilities are described in other GHTF guidance  
401 documents. These responsibilities include meeting both pre-market requirements and post-  
402 market requirements, such as adverse event reporting and notification of corrective actions.

403 Note 3 to entry: "Design and/or manufacture" may include specification development,  
404 production, fabrication, assembly, processing, packaging, repackaging, labelling, relabelling,  
405 sterilization, installation, or remanufacturing of HEALTH SOFTWARE, a HEALTH IT SYSTEMS or a  
406 MEDICAL DEVICE; or putting a collection of devices, and possibly other products, together for a  
407 medical purpose.

408 Note 4 to entry: Any person who assembles or adapts a MEDICAL DEVICE that has already been  
409 supplied by another person for an individual patient, in accordance with the instructions for use,  
410 is not the MANUFACTURER, provided the assembly or adaptation does not change the intended  
411 use of the HEALTH SOFTWARE, a HEALTH IT SYSTEM or MEDICAL DEVICE.

412 Note 5 to entry: Any person who changes the intended use of, or modifies, HEALTH SOFTWARE,  
413 a HEALTH IT SYSTEM or a MEDICAL DEVICE without acting on behalf of the original MANUFACTURER  
414 and who makes it available for use under his own name, should be considered the  
415 MANUFACTURER of the modified MEDICAL DEVICE.

416 Note 6 to entry: An authorised representative, distributor or importer who only adds its own  
417 address and contact details to the HEALTH SOFTWARE, a HEALTH IT SYSTEM or MEDICAL DEVICE  
418 or the packaging, without covering or changing the existing labelling, is not considered a  
419 MANUFACTURER.

420 Note 7 to entry: To the extent that an accessory is subject to the regulatory requirements of  
421 HEALTH SOFTWARE, a HEALTH IT SYSTEM or a MEDICAL DEVICE, the person responsible for the  
422 design and/or manufacture of that accessory is considered to be a MANUFACTURER.

423 Note 8 to entry: Some differences can occur in the definitions in regulations of each country.

424 [SOURCE: ISO 81001-1:2020, 3.33, modified – added note 8 to entry, extended to HEALTH  
425 SOFTWARE]

426

### 427 **3.20**

#### 428 **MEDICAL DEVICE**

429 instrument, apparatus, implement, machine, appliance, implant, reagent for in vitro use,  
430 software, material or other similar or related article, intended by the MANUFACTURER to be used,  
431 alone or in combination, for human beings, for one of more of the specific medical purpose(s)  
432 of

433 — diagnosis, prevention, monitoring, treatment or alleviation of disease,

434 — diagnosis, monitoring, treatment, alleviation of or compensation for an injury,

435 — investigation, replacement, modification, or support of the anatomy or of a physiological  
436 PROCESS,

437 — supporting or sustaining life,

438 — control of conception,

439 — cleaning, disinfection, or sterilization of MEDICAL DEVICES,

440 — providing information by means of in vitro examination of specimens derived from the human  
441 body,

442 and which does not achieve its primary intended action by pharmacological, immunological or  
443 metabolic means, in or on the human body, but which may be assisted in its function by such  
444 means

445 Note 1 to entry: PRODUCTS which could be considered to be MEDICAL DEVICES in some  
446 jurisdictions but not in others include:

447 — disinfection substances,

448 — aids for persons with disabilities,

449 — devices incorporating animal and/or human tissues,

450 — devices for in-vitro fertilization or assisted reproductive technologies.

451 [SOURCE: ISO 81001-1:202x, 3.34]

452

### 453 **3.21**

#### 454 **PROCESS**

455 set of interrelated or interacting activities that use inputs to deliver an intended result (outcome)

456 [SOURCE: ISO 81001-1:202x, 3.38, modified – added “(outcome)” after “result”.]

457

### 458 **3.22**

#### 459 **PRODUCT**

460 output of an organization that can be produced without any transaction taking place between  
461 the organization and the customer

462 Note 1 to entry: Production of a PRODUCT is achieved without any transaction necessarily taking  
463 place between provider and customer, but can often involve this service element upon its  
464 delivery to the customer.

465 Note 2 to entry: The dominant element of a PRODUCT is that it is generally tangible.

466 [SOURCE: ISO 81001-1:202x, 3.39]

467

### 468 **3.23**

#### 469 **RESIDUAL RISK**

470 risk remaining after RISK CONTROL measures have been implemented

471 [SOURCE: ISO 81001-1:202x, 3.42]

472

### 473 **3.24**

#### 474 **RISK CONTROL**

475 PROCESS in which decisions are made and measures implemented by which risks are reduced  
476 to, or maintained within, specified levels

477 [SOURCE: ISO 81001-1:202x, 3.47]

478

### 479 **3.25**

#### 480 **RISK MANAGEMENT**

481 systematic application of management policies, procedures and practices to the tasks of  
482 analysing, evaluating, controlling and monitoring risk

483 [SOURCE: ISO 81001-1:202x, 3.50]

484

485 **3.26**486 **SAFETY**

487 freedom from unacceptable risk

488 Note 1 to entry: Risk is the combination of probability of harm and severity of harm (see ISO/IEC  
489 guide 51:2014).

490 Note 2 to entry: SECURITY incidents can lead to harm and can therefore have an impact on  
491 SAFETY.

492 [SOURCE: ISO 81001-1:202x, 3.55, modified – added notes to entry.]

493

494 **3.27**495 **SECURITY**496 **CYBERSECURITY**

497 A state where information and systems are protected from unauthorized activities, such as  
498 access, use, disclosure, disruption, modification, or destruction to a degree that the related  
499 risks to CONFIDENTIALITY, INTEGRITY, and AVAILABILITY are maintained at an acceptable level  
500 throughout the LIFE,CYCLE.

501 [SOURCE: ISO 81001-1:202x, 3.56]

502

503 **3.28**504 **SECURITY CAPABILITY**

505 broad category of technical, administrative or organizational controls to manage risks to  
506 CONFIDENTIALITY, INTEGRITY, AVAILABILITY and accountability of data and systems

507 [SOURCE: ISO 81001-1:202x, 3.57]

508

509 **3.29**510 **SOFTWARE COMPOSITION ANALYSIS**

511 (electronic) analysis of binaries.

512 Note to entry: SOFTWARE COMPOSITION ANALYSIS can be supported by tools or online services.

513

514 **3.30**515 **SOFTWARE ITEM**

516 identifiable part of a computer program, i.e. source code, object code, control code, control  
517 data, or a collection of these items

518 [SOURCE: IEC 62304:2015]

519

520 **3.31**521 **SOFTWARE MAINTENANCE**

522 modification of HEALTH SOFTWARE after release for INTENDED USE, for one or more of the following  
523 reasons:

524 a) corrective, as fixing faults;

525 b) adaptive, as adapting to new hardware or software platform;

526 c) perfective, as implementing new requirements;

527 d) preventive, as making the product more maintainable.

528 Note 1 to entry: See also ISO/IEC 14764:2006, 3.10.

529 [SOURCE: IEC 82304-1:2016, 3.21, modified – In the definition, the words "HEALTH SOFTWARE  
530 PRODUCT" have been replaced by "HEALTH SOFTWARE", and reference 3.10 has been added to  
531 the note to entry; and "hard-" has been replaced by "hardware"]

532

### 533 **3.32**

#### 534 **THREAT**

535 potential for violation of SECURITY, which exists when there is a circumstance, capability, action,  
536 or event that could breach SECURITY and cause harm

537 [SOURCE: ISO 81001-1:202x, 3.62]

### 538 **3.33**

#### 539 **THREAT MODEL**

540 documented result of THREAT MODELLING

### 541 **3.34**

#### 542 **THREAT MODELLING**

543 Threat Modelling: systematic exploration technique to expose any circumstance or event having  
544 the potential to cause damage to a system in the form of destruction, disclosure, modification  
545 of data, or denial of service.

546 [SOURCE: ISO 24765:2017, modified – replaced "harm" with "damage"]

547

### 548 **3.35**

#### 549 **USE ENVIRONMENT**

550 actual conditions and setting in which users interact with the HEALTH SOFTWARE

551 [SOURCE: IEC 62366-1:2015; 3.20, modified]

552 Note to entry: For the purpose of this document, that includes data interfaces.

553

### 554 **3.36**

#### 555 **VALIDATION**

556 confirmation, through the provision of objective evidence, that the requirements for a specific  
557 INTENDED USE or application have been fulfilled.

558 Note 1 to entry: The objective evidence needed for a VALIDATION is the result of a test or other  
559 form of determination such as performing alternative calculations or reviewing documents.

560 Note 2 to entry: The word "validated" is used to designate the corresponding status.

561 Note 3 to entry: The use conditions for VALIDATION can be real or simulated.

562 [SOURCE: ISO 9000:2015, 3.8.13]

563

### 564 **3.37**

#### 565 **VERIFICATION**

566 confirmation, through provision of objective evidence, that specified requirements have been  
567 fulfilled

568 Note 1 to entry: The objective evidence needed for a VERIFICATION can be the result of an inspection or of other  
569 forms of determination such as performing alternative calculations or reviewing documents.

570 Note 2 to entry: The activities carried out for VERIFICATION are sometimes called a qualification PROCESS.

571 Note 3 to entry: The word "verified" is used to designate the corresponding status.

572 [SOURCE: ISO 81001-1:20xx, 3.66, modified – Note 1 to entry has been rephrased.]

573

574 **3.38**

575 **VULNERABILITY**

576 flaw or WEAKNESS in a system's design, implementation, or operation and management that  
577 could be exploited to violate the system's SECURITY policy

578

579 [SOURCE: ISO 81001-1:202x, 3.67]

580

581 **3.39**

582 **WEAKNESS**

583 kind of deficiency.

584 Note: A WEAKNESS can result in a SECURITY risk.

585 [SOURCE: ISO 81001-1:202x, 3.68, modified]

586

587



## 588 **4 General Requirements**

### 589 **4.1 Quality Management**

#### 590 **4.1.1 Documentation of PROCESS**

591 The MANUFACTURER shall establish and maintain a documented quality management system  
592 that is the basis of SECURITY activities in the PRODUCT LIFECYCLE.

593 Throughout this document “establish an activity(s) X” means that the MANUFACTURER shall  
594 document X and shall ensure that X is done properly.

595 Note 1: This quality management system can be implemented according to ISO 13485 or other  
596 equivalent QMS.

597 Note 2: SECURITY considerations in quality management systems are described in Clause 10.

#### 598 **4.1.2 Identification of responsibilities**

599 The MANUFACTURER shall establish ACTIVITY(S) to identify the organizational roles and  
600 personnel responsible for each of the ACTIVITIES and PROCESSES required by this document.

601

602 Note 1: Personnel can be identified through functional roles instead of names.

603

#### 604 **4.1.3 Identification of applicability**

605 The MANUFACTURER shall identify the PRODUCTS or parts of PRODUCTS to which this standard  
606 applies.

607

608 Note: This requirement is not about product instances (and their identification) but about types  
609 of products or their parts. Having this activity(s) means that the MANUFACTURER has criteria  
610 for identifying which of its products are to be developed, maintained and supported using the  
611 activities required by this document.

612

### 613 **4.2 THREAT / RISK MANAGEMENT**

614 The MANUFACTURER shall establish a PROCESS for managing RISKS associated with SECURITY.  
615 This PROCESS shall provide methods for identifying VULNERABILITIES, estimating and evaluating  
616 the associated THREATS, controlling these THREATS, and monitoring the effectiveness of the RISK  
617 CONTROL (SECURITY) measures, taking into account the INTENDED USE and the INTENDED  
618 ENVIRONMENT OF USE of the HEALTH SOFTWARE.

619 The MANUFACTURER shall establish the criteria for RISK acceptability that shall be applied when  
620 determining the appropriate way to address each issue.

621 The SECURITY RISK MANAGEMENT should incorporate outcomes of the THREAT Modelling  
622 Activity(s) and other inputs such as guidelines and state-of-the-art.

623 Detailed PROCESS steps are described in Clause 7.

624

625 Note: This PROCESS can be part of an existing general RISK MANAGEMENT PROCESS: SECURITY  
626 RISK MANAGEMENT can be conducted under the framework of ISO 14971 with an appropriate  
627 mapping of VULNERABILITY, THREAT and other SECURITY related terms. (See ISO/TR 24971:20XX  
628 for possible mapping.)

629

630 The MANUFACTURER shall document any RESIDUAL RISK associated with a VULNERABILITY that  
631 remains in the system.

632 See Annex D on THREAT MODELLING

633

## 634 5 Software development PROCESS

### 635 5.1 Software Development Planning

#### 636 5.1.1 ACTIVITIES in the lifecycle PROCESS

637 The MANUFACTURER shall establish general lifecycle ACTIVITIES – from conception to  
638 decommissioning - that are consistent and integrated with a commonly accepted PRODUCT  
639 development PROCESS including but not limited to:

- 640 a) configuration management with change controls and change history;
- 641 b) PRODUCT description and requirements definition with requirements TRACEABILITY;

642

643 Note 1: TRACEABILITY links requirements to their origin and traces them throughout the  
644 project life cycle to design elements, implementation and test cases (ISO 24765:2017,  
645 modified)

- 646 c) software or hardware design and implementation practices, such as modular design;
- 647 d) repeatable testing VERIFICATION and VALIDATION PROCESS;
- 648 e) review and approval of all development PROCESS records; and
- 649 f) Product support.

650

651 Note 2: Product Support means providing of information, assistance and training to install  
652 and make Health Software operational in its intended environment and to distribute  
653 improved capabilities to users (ISO 24765:2017)

654

655 Note 3: The underlying practice SM-5 in IEC 62443-4-1 specifies a requirement for  
656 PROCESS tailoring. This is meant to base an appropriate reduction of security activities on  
657 the outcomes of the security analysis.

658

#### 659 5.1.2 Development environment SECURITY

660 The MANUFACTURER shall establish procedural and technical controls for protecting the IT  
661 infrastructure used for development, production delivery and maintenance from unauthorized  
662 access, corruption and deletion. This includes protecting the HEALTH SOFTWARE during design,  
663 implementation, updates, testing and release.

664

#### 665 5.1.3 Secure coding standards

666 The MANUFACTURER shall establish and maintain secure coding standards. (See Annex A,  
667 Rationale)

668

### 669 5.2 HEALTH SOFTWARE Requirements Analysis

#### 670 5.2.1 HEALTH SOFTWARE SECURITY requirements

671 The MANUFACTURER shall establish an ACTIVITY(S) for ensuring that SECURITY requirements are  
672 documented for the HEALTH SOFTWARE including requirements for SECURITY capabilities related to  
673 installation, operation, MAINTENANCE and decommissioning.

674

675 The MANUFACTURER shall establish an ACTIVITY(S) ensuring that SECURITY requirements include  
676 the following information:

- 677 a) The scope and boundaries of the components of the HEALTH SOFTWARE, in general terms  
678 in both a physical and logical way;
- 679 b) Information on interfaces: The integration capabilities of the HEALTH SOFTWARE's Identity  
680 and Access Management with that of the HDO (where applicable); AND the integration  
681 capabilities of the HEALTH SOFTWARE within the operating environment of the HDO
- 682 c) Controls implemented in the product
- 683 d) Design for (SECURITY) update of HEALTH SOFTWARE including the update of incorporated  
684 software from external sources.

685

686 Note 1: IEC TR 60601-4-5 gives guidance on the specification of SECURITY capabilities and their  
687 documentation in the accompanying documents and provides a method of determining  
688 requirements from the SECURITY CAPABILITY level.

689 Note 2: IEC TR 80001-2-2 specifies SECURITY -related needs, risks and controls as a guidance  
690 for disclosure and communication between the MANUFACTURER and the HEALTHCARE DELIVERY  
691 ORGANIZATION.

692

693 Note 3: The PRODUCT requirements PROCESS interfaces with HEALTH SOFTWARE requirements.  
694 Some technical controls can be implemented at PRODUCT level. (for example by hardware).

695

## 696 **5.2.2 SECURITY requirements review**

697 The MANUFACTURER shall establish an ACTIVITY(S) which incorporates reviews to ensure that  
698 SECURITY requirements are reviewed, updated as necessary and approved to ensure clarity,  
699 validity, alignment with the SECURITY RISK MANAGEMENT PROCESS, and their ability to be verified.

700 The MANUFACTURER shall document the level of independence of the reviewers. Each of the  
701 following representative disciplines shall participate in this ACTIVITY(S):

- 702 a) architects/developers (those who will implement the requirements);
- 703 b) testers (those who will validate that the requirements have been met);
- 704 c) cross-functional experts (may include those with clinical expertise); and
- 705 d) SECURITY advisor.

706

707 Note 1: A single person can be responsible for multiple disciplines. It is not advisable to have  
708 a single person representing all disciplines.

709

710 Note 2: The list of disciplines has to be documented at least once per project.

711

712 Note 3: QMS like that of ISO 13485 require consideration of independence of reviewers.

713

## 714 **5.2.3 SECURITY requirements for externally provided components**

715 The MANUFACTURER shall establish an ACTIVITY(S) that identifies and manages the SECURITY  
716 risks of all externally provided components intended to be used with the HEALTH SOFTWARE.

717

718 Note: This ACTIVITY(S) can be part of supply chain security ACTIVITIES.

719

## 720 **5.3 Software Architectural Design**

### 721 **5.3.1 Defense in depth ARCHITECTURE/design**

722 The MANUFACTURER shall establish an ACTIVITY(S) to specify a secure ARCHITECTURE.

723 At each stage of development, the MANUFACTURER shall consider DEFENSE-IN-DEPTH and assign  
724 technical responsibilities to each layer of defense.

725 Note: DEFENSE-IN-DEPTH may include security requirements to be transferred to and  
726 implemented by the HDO.

### 727 **5.3.2 Document secure design best practices**

728 The MANUFACTURER shall establish an ACTIVITY(S) to identify, enforce and maintain secure  
729 design practices. The MANUFACTURER shall document secure design best practices, which  
730 should include but are not limited to:

- 731 a) least privilege (granting only the privileges to users/software necessary to perform  
732 intended operations);
- 733 b) using proven secure components/designs where possible;
- 734 c) economy of mechanism (striving for simple designs);

- 735 d) using secure design patterns;
- 736 e) ATTACK SURFACE reduction;
- 737 f) documenting all trust boundaries as part of the design; and
- 738 g) removing debug ports, headers and traces from circuit boards used during development
- 739 from production hardware or documenting their presence and the need to protect them
- 740 from unauthorized access;
- 741 h) removing debug code (variables, break points, console logging) used during
- 742 development from production software or documenting the presence of debug code and
- 743 the need to protect it from unauthorized access.

744

745 Note: See Annex B: “Guidance“

746

### 747 **5.3.3 SECURITY architectural design review**

748 The MANUFACTURER shall implement an architectural review of the HEALTH SOFTWARE with  
749 respect to (behavior under adverse conditions)

- 750 a) effective segregation of SOFTWARE ITEMS,
- 751 b) the secure design best practices (see 5.3.2)
- 752 c) potential SECURITY flaws introduced by the architecture.

753

754 Note: Segregation uses technical controls in design and implementation in order to ensure that  
755 SOFTWARE ITEMS cannot be influenced by other SOFTWARE ITEMS of the HEALTH SOFTWARE in an  
756 unintended way.

757

## 758 **5.4 Software Detailed Design**

### 759 **5.4.1 Secure detailed design best practices**

760 The MANUFACTURER shall establish and maintain the use of best practices towards a secure  
761 design, taking into account

- 762 a) software technology at application level (like algorithms, methods ...)
- 763 b) the programming technology used, (e.g. programming language)
- 764 c) the secure design best practices in 5.3.2.

765

### 766 **5.4.2 Secure HEALTH SOFTWARE design**

767 The MANUFACTURER shall establish an ACTIVITY(S) to develop and document a secure design  
768 that identifies and characterizes each interface of the HEALTH SOFTWARE including physical and  
769 logical interfaces. As appropriate, the design shall identify:

- 770 a) an indication of whether the interface is externally accessible (by other PRODUCTS) or  
771 internally accessible - between components of the HEALTH SOFTWARE- or both
- 772 b) SECURITY implications of the HEALTH SOFTWARE SECURITY context on the external  
773 interface
- 774 c) potential users of the interface and the ASSETS that can be accessed through the  
775 interfaces (directly or indirectly)
- 776 d) a determination of whether the static design accesses interfaces across trust  
777 boundaries;
- 778 e) SECURITY considerations, assumptions and/or constraints associated with the use of the  
779 interface within the HEALTH SOFTWARE SECURITY context; including applicable THREATS,
- 780 f) the SECURITY roles, privileges/rights and access control permissions needed to use the  
781 interface and to access the ASSETS defined in c)
- 782 g) the SECURITY capabilities and/or compensating mechanisms used to safeguard the  
783 interface and the ASSETS identified in c) including run-time validation of inputs as well  
784 as handling outputs and errors;

- 785 h) the use of third-party components to implement the interface and their SECURITY  
786 capabilities
- 787 i) documentation that describes how to use the interface if it is externally accessible; and
- 788 j) description of how the design mitigates the THREATS identified in the THREAT model.

789 Note: The SECURITY context for HEALTH SOFTWARE is derived from the INTENDED ENVIRONMENT  
790 OF USE at PRODUCT-level, considering also the configuration and integration of HEALTH  
791 SOFTWARE.

792

### 793 **5.4.3 Detailed design VERIFICATION towards SECURITY**

794 The MANUFACTURER shall establish an ACTIVITY(S) for conducting design reviews to identify,  
795 characterize and track to closure WEAKNESSES associated with each significant revision of the  
796 secure design including but not limited to:

- 797 a) SECURITY requirements that were not adequately addressed by the design
- 798 b) THREATS and their ability to exploit VULNERABILITIES in PRODUCT interfaces, trust  
799 boundaries and ASSETS
- 800 c) Identification, documentation and characterization of (detailed) design best-practices  
801 that were not followed (5.3.2 and 5.4.1)

802

## 803 **5.5 Software Unit Implementation and VERIFICATION**

### 804 **5.5.1 Secure Coding Standards**

805 The MANUFACTURER shall establish an implementation ACTIVITY(S) following secure coding  
806 standards.

807

### 808 **5.5.2 SECURITY implementation review**

809 The MANUFACTURER shall establish an ACTIVITY(S) to ensure that implementation reviews are  
810 performed for identifying, characterizing and feed into the Problem Resolution Process all  
811 SECURITY-related issues associated with the implementation of the secure design including:

- 812 a) identification of SECURITY requirements (see 5.2) that were not adequately addressed  
813 by the implementation;
- 814 Note: Requirements allocation, including SECURITY requirements, is part of typical  
815 design PROCESSES.
- 816 b) identification of secure coding standards that were not followed (for example, use of  
817 banned functions or failure to apply the principle of least privilege);
- 818 c) Static Code Analysis (SCA) for source code to determine secure coding errors using the  
819 secure coding standard for the supported programming language, as established in  
820 5.1.3
- 821 d) review of the implementation and its traceability to the SECURITY capabilities defined to  
822 support the SECURITY design (see 5.3 and 5.4); and
- 823 e) examination of THREATS and their ability to exploit implementation interfaces, trust  
824 boundaries and ASSETS (see 5.3 and 5.4).

825

## 826 **5.6 Software integration testing**

827 The MANUFACTURER may perform some of the Software System Testing as a part of Software  
828 Integration Testing (see 5.7)

## 829 **5.7 Software System Testing**

### 830 **5.7.1 SECURITY requirements testing**

831 The MANUFACTURER shall establish an ACTIVITY(S) for verifying that the HEALTH SOFTWARE  
832 SECURITY functions meet the SECURITY requirements and that the HEALTH SOFTWARE handles  
833 error scenarios and invalid input. Based on the INTENDED ENVIRONMENT OF USE, types of testing  
834 shall include:

- 835 a) Functional testing of SECURITY requirements;
- 836 b) Performance and scalability testing; and

- 837 c) Boundary/edge condition, stress and malformed or unexpected input tests with potential  
838 SECURITY consequences;

839

840 Note: See Annex B 7.3

841

842

### 843 **5.7.2 THREAT mitigation testing**

844 The MANUFACTURER shall establish an ACTIVITY(S) for testing the effectiveness of the mitigation for  
845 the THREATS identified and validated in the THREAT model. Activities shall include:

- 846 a) creating and executing plans to ensure that each mitigation implemented to address a  
847 specific THREAT has been adequately tested to ensure that the mitigation works as  
848 designed; and
- 849 b) creating and executing plans for attempting to thwart each mitigation.

850

### 851 **5.7.3 VULNERABILITY testing**

852 The MANUFACTURER shall establish an ACTIVITY(S) for performing tests that focus on identifying and  
853 characterizing potential SECURITY VULNERABILITIES in the HEALTH SOFTWARE. Known VULNERABILITY  
854 testing shall be based upon, at a minimum, recent contents of an established, industry-recognized,  
855 public source for known VULNERABILITIES. As appropriate, testing shall include:

- 856 a) abuse case or malformed or unexpected input testing focused on uncovering SECURITY  
857 issues. This shall include manual or automated abuse case testing and specialized  
858 types of abuse case testing on all external interfaces and protocols. Examples include  
859 fuzz testing and network traffic load testing and capacity testing;
- 860 b) ATTACK surface analysis to determine all avenues of ingress and egress to and from the  
861 system, common VULNERABILITIES including but not limited to weak access-control-lists  
862 (ACLs), exposed ports and services running with elevated privileges;
- 863 c) black box known VULNERABILITY scanning focused on detecting known VULNERABILITIES  
864 in (if applicable) hardware, host, interfaces or software components

865 Note: For example, this could be a network based known VULNERABILITY scan;

- 866 d) for compiled software, SOFTWARE COMPOSITION ANALYSIS on all binary executable files,  
867 including embedded firmware, delivered by a component supplier to be used with  
868 HEALTH SOFTWARE. This analysis shall be used to support testing ACTIVITIES in minimum  
869 detection of:

- 870 1) known VULNERABILITIES in the HEALTH SOFTWARE components;
- 871 2) linking to vulnerable libraries;
- 872 3) SECURITY rule violations; and
- 873 4) compiler settings that can lead to VULNERABILITIES;

- 874 e) dynamic runtime resource management testing that detects flaws not visible under static  
875 code analysis, including but not limited to denial of service conditions due to failing to  
876 release runtime handles, memory leaks and accesses made to shared memory without  
877 authentication. This testing shall be applied if such tools are available

878 Note: Dynamic runtime testing cannot be done effectively without tools.

879

### 880 **5.7.4 Penetration testing**

881 The MANUFACTURER shall establish an ACTIVITY(S) to identify and characterize WEAKNESSES via  
882 tests that focus on discovering and exploiting SECURITY VULNERABILITIES in the HEALTH  
883 SOFTWARE.

884

## 885 **5.8 Software Release**

### 886 **5.8.1 Resolve findings prior to release**

887 The MANUFACTURER shall establish an ACTIVITY(S) to ensure that all findings from system testing  
888 have been handled by the Problem Resolution PROCESS (Clause 9).

**889 5.8.2 Release documentation**

890 As a part of the software release ACTIVITY(s) the MANUFACTURER shall establish requirements  
891 for ACCOMPANYING DOCUMENTS:

- 892 a) Secure operation guidelines
- 893 b) Account management guidelines (if applicable)

894

---

**895 5.8.3 File INTEGRITY**

896 The MANUFACTURER shall establish an ACTIVITY(s) to provide an INTEGRITY VERIFICATION  
897 mechanism for all scripts, executables and other security-relevant files used with a HEALTH  
898 SOFTWARE.

899

**900 5.8.4 Controls for private keys**

901 The MANUFACTURER shall have procedural and technical controls in place to protect private keys  
902 used for code signing from unauthorized access or modification.

903

904 Note: This refers to the software supply chain and the focus is on code signing to support secure  
905 distribution and delivery of HEALTH SOFTWARE.

906

**907 5.8.5 Assessing and addressing SECURITY-related issues**

908 The MANUFACTURER shall establish an ACTIVITY(S) for verifying that a HEALTH SOFTWARE or an  
909 update is not released until its SECURITY-related issues have been addressed and tracked to  
910 closure (see 9.5). This includes issues associated with:

- 911 a) requirements (see 5.2);
- 912 b) security by design (see 5.3 and 5.4);
- 913 c) implementation (see 5.5);
- 914 d) VERIFICATION / VALIDATION (see 5.5); and
- 915 e) SECURITY defect management (see 9.4).

916

**917 5.8.6 ACTIVITY Completion**

918 The MANUFACTURER shall establish an ACTIVITY(S) for verifying that, prior to HEALTH SOFTWARE  
919 release, all applicable SECURITY-related PROCESSES required by this standard have been  
920 completed with records documenting the completion of each ACTIVITY(S) or PROCESS.

## 921 **6 SOFTWARE MAINTENANCE PROCESS**

### 922 **6.1 SECURITY Update Management**

#### 923 **6.1.1 SECURITY Update VERIFICATION**

924 The MANUFACTURER shall establish an ACTIVITY(S) for verifying that SECURITY updates created  
925 by the MANUFACTURER address the intended SECURITY VULNERABILITIES

926  
927 The MANUFACTURER shall establish an ACTIVITY(S) for verifying that SECURITY updates do not  
928 introduce unintended effects to functional or quality attributes of Health Software. Such security  
929 updates include but are not limited to updates created by:

- 930 a) the HEALTH SOFTWARE MANUFACTURER;
- 931 b) suppliers of components used in the HEALTH SOFTWARE; and
- 932 c) suppliers of components or platforms on which the HEALTH SOFTWARE depends.

933 The manufacturer may define that for certain components or platforms, there is a shared  
934 responsibility for such VERIFICATION.

935

936 Note: Also see Clause 9 “Problem Resolution PROCESS”

937

#### 938 **6.1.2 Modification Implementation**

939 The MANUFACTURER shall establish an ACTIVITY(S) to ensure that each applicable update for  
940 supported PRODUCTS and PRODUCT versions is made available to PRODUCT users in a manner  
941 that facilitates INTEGRITY VERIFICATION of the SECURITY update.

942

943

## 944 **6.2 Post-Market activities for HEALTH SOFTWARE**

### 945 **6.2.1 SECURITY update documentation**

946 The MANUFACTURER shall establish an ACTIVITY(S) to ensure that documentation about HEALTH  
947 SOFTWARE SECURITY updates is made available that includes but is not limited to:

- 948 a) risks (potential impact to SAFETY, effectiveness, SECURITY) of not applying the update  
949 and mitigations that can be used for updates that are not approved or deployed by the  
950 ASSET owner;
- 951 b) the potential for patient harm – if the update is not being installed;
- 952 c) a strategy to reduce the risk of patient harm to an acceptable and controlled level.

953

### 954 **6.2.2 Dependent component**

955 The MANUFACTURER shall establish a policy to provide dependent component or operating  
956 system SECURITY updates to PRODUCT users and ensure that this policy is followed. At minimum,  
957 this policy shall include:

958 a) stating whether the HEALTH SOFTWARE is compatible with the dependent component or  
959 operating system SECURITY update; and

960 b) for SECURITY updates that are unapproved by the HEALTH SOFTWARE MANUFACTURER,  
961 the mitigations that can be used in lieu of not applying the update.

962 Note: A dependent component is a component external to the HEALTH SOFTWARE on which the  
963 PRODUCT depends.

964

### 965 **6.2.3 Timely delivery of SECURITY updates**

966 The MANUFACTURER shall establish - as a part of the update activities - a policy that specifies  
967 the timeframes for delivering and qualifying (see 6.1.1) SECURITY updates to PRODUCT users.  
968 At a minimum, this policy shall consider the following factors:

- 969 a) the potential impact (technical, towards SAFETY, effectiveness, SECURITY) of the  
970 VULNERABILITY;



- 971 b) public knowledge of the VULNERABILITY;  
972 c) whether published EXPLOITS exist for the VULNERABILITY;  
973 d) the volume of deployed PRODUCTS that are affected; and  
974 e) the availability of an effective mitigation when no HEALTH SOFTWARE update is being  
975 provided

976

977 Note 1: Some regulatory authorities may have specific timeframe requirements.

978 Note 2: The MANUFACTURER may categorize SECURITY updates (for example by potential  
979 impact) and specify appropriate timeframes.

980

981 Note 3: During an acceptable time-interval in which the MANUFACTURER develops a technical  
982 compensating control, any documented mitigations and constraints on the intended use can be  
983 based on RISK MANAGEMENT. It is advisable to develop and deploy a technical mitigation in  
984 HEALTH SOFTWARE.

985

986 Note 4: IEC TR 60601-4-5 specifies a minimum performance ("Essential Function" term as used  
987 in IEC 62443 series) to be available with medical devices in case of relevant cybersecurity  
988 attacks on the HDO IT network. Such minimum performance is needed to ensure basic  
989 functionality until a verified security update is available in situations in which all medical  
990 devices of the same type in the HDO may be affected by a given cybersecurity attack  
991 simultaneously. Therefore, for Medical Devices, the software lifecycle activities should  
992 ensure that

993 a) "essential functions" remain secure for the interval until a security update is installed,  
994 and

995 b) security updates should always re-establish the security capabilities as specified in the  
996 accompanying documents.

997 Additional guidance is provided by IEC TR 60601-4-5

998

### 999 **6.3 Decommissioning and disposal of HEALTH SOFTWARE**

1000 The MANUFACTURER shall establish an ACTIVITY(S) to create PRODUCT user documentation that  
1001 includes guidelines for removing the HEALTH SOFTWARE from use.

1002

## 1003 **7 SECURITY RISK MANAGEMENT**

### 1004 **7.1 Risk management Context**

1005 The MANUFACTURER shall establish and maintain a PROCESS for managing security risks related  
1006 to Health Software as a part of product risk management. This PROCESS should consist of  
1007 following PROCESS steps described in this chapter.

1008  
1009 Note 1: SECURITY RISK MANAGEMENT can be conducted under the framework of ISO 14971 with  
1010 an appropriate mapping of VULNERABILITY, THREAT and other SECURITY related terms. (See  
1011 ISO/TR 24971:20XX for possible mapping.)

1012  
1013 Note 2: See Annex D.

1014

#### 1015 **7.1.1 Product security context**

1016 The MANUFACTURER shall establish an ACTIVITY(S) to ensure that the intended product security  
1017 context is documented.

1018

1019 This ACTIVITY(S) is required to ensure that the minimum requirements of the environment and  
1020 the assumptions about that environment are documented in order to achieve the security level  
1021 for which the product was designed. The purpose of defining this information is so that both the  
1022 developers of the product and the product users have the same understanding about how the  
1023 product is intended to be used. This will help the developers make appropriate design decisions  
1024 and the users to use the product as it was intended.

1025 Security context could include:

- 1026 a) location in the network;
- 1027 b) physical or cyber security provided by the environment where the product will be  
1028 deployed;
- 1029 c) isolation (from a network perspective); and
- 1030 d) if known, potential impact to the environment (for example, loss of life, injury, loss of  
1031 production, etc.)
- 1032 e) security controls implemented in dedicated hardware with which the HEALTH SOFTWARE  
1033 is intended to be used.

1034

1035 For example, it is important to document whether physical security is required. If no physical  
1036 security is expected to be present, then that may add a number of related requirements such  
1037 as not allowing pushbutton configuration on the product. Another example is if the product is  
1038 expected to be protected by a user supplied firewall that connects it to the Health-IT-network  
1039 or user network, the product would typically not require a firewall of its own.

1040

1041 Documenting these external security features for the product (its security context) allows  
1042 developers to design a defense in depth strategy that complements this security context and  
1043 testers to validate and verify the security of a product in an environment similar to how it should  
1044 be deployed.

1045 Having this process means that the deployment environment in which the product is intended  
1046 to be used is correctly represented in all processes involved in the development and testing of  
1047 this product and are documented

1048

### 1049 **7.2 Identification of VULNERABILITIES, THREATS and associated adverse impacts**

1050 The MANUFACTURER shall establish an ACTIVITY(S) which identifies and documents any  
1051 VULNERABILITIES, THREATS and associated adverse impacts affecting CONFIDENTIALITY,  
1052 INTEGRITY, AVAILABILITY of ASSETS in HEALTH SOFTWARE –This Activity(s) shall consider the  
1053 intended use and the INTENDED ENVIRONMENT OF USE with respect to the acceptable level of  
1054 RESIDUAL RISK as defined in the Risk Management Process .

1055

1056 These activity(s) shall be employed to ensure that all products shall have a threat model specific  
1057 to the current development scope of the product with the following characteristics (where  
1058 applicable):

- 1059 a) correct flow of categorized information throughout the system;
- 1060 b) trust boundaries;
- 1061 c) processes;
- 1062 d) data stores;
- 1063 e) interacting external entities;
- 1064 f) internal and external communication protocols implemented in the product;
- 1065 g) externally accessible physical ports including debug ports;
- 1066 h) circuit board connections such as Joint Test Action Group (JTAG) connections or debug  
1067 headers which might be used to attack the hardware;
- 1068 i) potential attack vectors including attacks on the (intended) hardware, if applicable;
- 1069 j) potential threats and their severity as defined by a vulnerability scoring system (for  
1070 example, CVSS);
- 1071 k) mitigations and/or dispositions for each threat;
- 1072 l) security-related issues identified; and
- 1073 m) external dependencies in the form of drivers or third-party applications (code that is not  
1074 developed by the supplier) that are linked into the application.

1075

1076 The threat model shall be reviewed and verified by the development team to ensure that it is  
1077 correct and understood.

1078 The threat model shall be reviewed periodically (at least once a year) for released products  
1079 and updated if required in response to the emergence of new threats to the product even if  
1080 the design does not change.

1081 Any issues identified in the threat model shall be addressed as defined in 9.4 and 9.5.

1082

### 1083 **7.3 Estimation and evaluation of SECURITY Risk**

1084 The MANUFACTURER shall establish an ACTIVITY(S) to

- 1085 a) estimate the risk of the items (Vulnerabilities, Threats) identified above. Risk estimation  
1086 is done considering the SEVERITY of adverse impact of that item. This estimation can be  
1087 supported by using VULNERABILITY scoring such as the Common Vulnerability Scoring  
1088 System (CVSS)
- 1089 b) evaluate the estimated risks and determine if the risk is acceptable or not.
- 1090 c) inform the PRODUCT RISK MANAGEMENT PROCESS about any updates to the THREAT  
1091 model.

1092

### 1093 **7.4 Controlling SECURITY Risk**

1094 The MANUFACTURER shall determine risk control measures that are appropriate for reducing the  
1095 risks to an acceptable level. The MANUFACTURER may consider the benefit-risk balance when  
1096 determining whether the risk is acceptable

1097

1098

### 1099 **7.5 Monitoring the effectiveness of risk controls.**

1100 The manufacturer shall monitor the effectiveness of RISK CONTROLS by information collection  
1101 and review during the post-market phase.

1102 This ACTIVITY(S) shall also inform other ACTIVITIES and PROCESSES of the issue or related  
1103 issue(s), including PROCESSES for other PRODUCTS / revisions; and inform third parties (e.g.  
1104 suppliers) if problems have been found in third-party source code to be used with the HEALTH  
1105 SOFTWARE.

1106 Any issues identified in the THREAT model of released HEALTH SOFTWARE will be addressed as  
1107 defined in 9.4 and 9.5.

1108

## 1109 **8 Software configuration management PROCESS**

1110 The MANUFACTURER shall establish a general PRODUCT development/ MAINTENANCE /support  
1111 PROCESS that includes configuration management with change controls and AUDIT LOGGING.

1112

## 1113 **9 Software problem resolution PROCESS**

### 1114 **9.1 Overview**

1115 The ACTIVITIES specified by this clause are used for handling SECURITY-related issues of HEALTH  
1116 SOFTWARE.

### 1117 **9.2 Receiving notifications about VULNERABILITIES**

1118 The MANUFACTURER shall establish an ACTIVITY(S) that enables the reporting of information  
1119 regarding VULNERABILITIES to the MANUFACTURER – independent of whether they come from an  
1120 internal entity, an external entity or via a complaint-handling system.

1121 This reception PROCESS shall receive and track to closure reports on SECURITY-related issues  
1122 in the PRODUCT reported by internal (including an existing complaint-handling system) and  
1123 external sources including at a minimum:

- 1124 a) SECURITY VERIFICATION and VALIDATION testers;
- 1125 b) suppliers of third-party components used in the PRODUCT;
- 1126 c) PRODUCT developers and testers; and
- 1127 d) PRODUCT users including integrators, operators, administrators, and maintenance  
1128 personnel.
- 1129 e) data obtained from AUDIT (EVENT) LOG information.

1130

1131 Note 1: Typically, such information comes from publications, reports, independent security  
1132 research, internal investigation and so on.

1133

1134 Note 2: External SECURITY VERIFICATION and VALIDATION testers include researchers.

1135

1136 Note 3: Also see ISO/IEC 29147:2018 Information Technology – Security Techniques –  
1137 Vulnerability Disclosure

1138

### 1139 **9.3 Reviewing VULNERABILITIES**

1140 The MANUFACTURER shall establish an ACTIVITY(S) that enables the investigation of  
1141 VULNERABILITIES in a timely manner to determine their:

- 1142 a) applicability to the PRODUCT;
- 1143 b) verifiability; and
- 1144 c) related THREATS.

1145

1146 Note 1: Timeliness is driven by authorities, applicable legislation, regulatory policy and market  
1147 forces.

1148

1149 Note 2: This PROCESS may be implemented for example as a part of the PROCESSES per ISO  
1150 13485:2016 clause 8.2.1 Feedback, 8.2.2 Complaint handling and 8.2.3 Reporting to regulatory  
1151 authorities.

1152

### 1153 **9.4 Analysing VULNERABILITIES**

1154 The MANUFACTURER shall establish an ACTIVITY(S) for analysing VULNERABILITIES in the PRODUCT  
1155 to include:

- 1156 a) assessing their impact with respect to:

- 1157 1) the technical SECURITY context in which they were discovered; (see IEC 62443-4-1  
1158 Clause 6, Practice 2 – Specification of SECURITY requirements)  
1159 2) the PRODUCT'S INTENDED ENVIRONMENT OF USE; and  
1160 3) the PRODUCT'S defence in depth strategy;  
1161 b) SEVERITY as defined by a VULNERABILITY scoring system (for example, CVSS);  
1162 c) identifying all other PRODUCTS / PRODUCT versions containing the SECURITY-related issue  
1163 (if any);  
1164 d) identifying the root cause of the issue;  
1165 e) identifying related SECURITY issues (that is, in the same PRODUCT) and  
1166 f) impact on PRODUCT SAFETY and effectiveness.

1167  
1168 Note 1: For root cause analysis, a methodical approach such as method described in IEC 62740  
1169 may be employed.

1170  
1171 Note 2: A root cause is the first event in a sequence of causal factors which is deviating from  
1172 the intended sequence.

1173  
1174 Note 3: Not all root causes can be fixed by technical measures in HEALTH SOFTWARE.

1175  
1176 Note 4: This PROCESS may be implemented for example as a part of ISO 13485:2016 clause  
1177 8.5.2 and 8.5.3 .

## 1178 **9.5 Addressing SECURITY-related issues**

1179  
1180 The MANUFACTURER shall establish an ACTIVITY(S) to address SECURITY-related issues and  
1181 determine whether to disclose them (under 10.4) based on the results of the impact assessment  
1182 and the acceptable level of RESIDUAL RISK.

1183 The MANUFACTURER shall establish an ACTIVITY(S) to determine whether and how identified  
1184 SECURITY risks will be handled - via the Problem Resolution PROCESS or through updated  
1185 specifications regarding the INTENDED ENVIRONMENT OF USE.

1186 The MANUFACTURER shall establish an ACTIVITY(S) to review any changes to the design or  
1187 implementation for impact on SAFETY, SECURITY and effectiveness.

1188 The Manufacturer shall inform other processes of the issue or related issue(s), including  
1189 processes for other products/product revisions.

1190 The Manufacturer shall inform third parties if problems have been found in third-party source  
1191 code to be used with the Health Software. In case of open-source software, the publishing  
1192 platform may be used to inform about or fix the issue found.

1193 This PROCESS shall include a periodic review of open SECURITY-related issues to ensure that  
1194 issues are being addressed appropriately. This periodic review shall at a minimum occur during  
1195 each PRODUCT release; see 10.3 "Continuous Improvement", and 10.5 "Periodic review".

1196  
1197 Note 1: This periodic review may be implemented for example as a part of ISO 13485:2016  
1198 clause 8.2.6 Monitoring and measurement of PRODUCT

1199  
1200  
1201 Note 1: As an example, an intended function including the transmission of PHI through an  
1202 uncontrolled network may raise the need for data encryption.

1203  
1204 Note 2:

1205 • For some THREATS it can be feasible to not mitigate them through technical measures  
1206 in HEALTH SOFTWARE, because they can be linked to the intended use or essential  
1207 functions.

1208 • Example: Console access to emergency / acute care devices would be hindered by  
1209 overly complex authentication procedures and might delay the delivery of urgent care.

- 1210 • Example: Hard cryptography algorithms for encrypting data used for near-field  
1211 transmission in principle use considerable computing power and can drain the battery  
1212 when implemented in smaller, mobile devices.
- 1213 • Some THREATS can be better addressed by mitigations in the INTENDED ENVIRONMENT  
1214 OF USE.
- 1215 • There can be THREATS that are not exploitable because of measures in the design of  
1216 the HEALTH SOFTWARE.
- 1217
- 1218 Note 3: Because of the complexity in determining the probability related to THREATS, the concept  
1219 of likelihood is more appropriate and commonly used for IT- SECURITY. Likelihood of identified  
1220 THREATS is typically expressed through structured scoring systems like Common Vulnerability  
1221 Scoring Systems (CVSS), which may also take into account the attacker's gain in relation to the  
1222 required effort.
- 1223 Note 4: RISK MANAGEMENT for MEDICAL DEVICE SAFETY – as in ISO 14971 - can be supported  
1224 by a THREAT MODELLING method to cover SECURITY THREATS.
- 1225 Note 5: IEC 63069 explains the SAFETY / SECURITY relationship.  
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## 10 Quality management system

### 10.1 SECURITY expertise

The MANUFACTURER shall establish an ACTIVITY(S) for identifying and providing SECURITY training and assessment programs to ensure that personnel assigned to the organizational roles and duties specified in 4.1.2 have demonstrated SECURITY expertise appropriate for those PROCESSES. Results of this PROCESSES include role descriptions, training profiles and training records.

Note 1: This ACTIVITY(S) may be implemented for example as a part of ISO 13485:2016 clause 6.2 Human resources.

### 10.2 Components from third-party suppliers

The MANUFACTURER shall establish an ACTIVITY(S) to ensure that SECURITY LIFECYCLE PROCESSES that conform with this document are used by each third-party component supplier if that component can have an impact on SECURITY and

- a) the supplier is contracted to develop components for a specific purpose for the MANUFACTURER, or
- b) the component will be obtained as Off-the-shelf software

Note 1: This ACTIVITY(S) may be implemented for example as a part of ISO 13485:2016 clause 7.4 Purchasing.

### 10.3 Continuous improvement

The MANUFACTURER shall establish an ACTIVITY(S) for continuously improving the SDL (SECURITY development LIFECYCLE). This ACTIVITY(S) shall include the analysis of SECURITY defects in component/subsystem/system technologies that have been deployed to the field – due to insufficient or lacking ACTIVITIES.

Note 1: This PROCESS may be implemented for example as a part of ISO 13485:2016 clause 8.5 Improvement.

Note 2: This ACTIVITY(S) is required to ensure that the MANUFACTURER improve the rigor of their SECURITY activities over time. In case of process-dependent SECURITY defects it is important for the MANUFACTURER to help compensate for this by continuously improving their SECURITY activities.

### 10.4 Disclosing SECURITY-related issues

The MANUFACTURER shall establish an ACTIVITY(S) for informing regulatory authorities and PRODUCT users about reportable VULNERABILITIES (see 9.5 ) in supported PRODUCTS in a timely manner with content that includes but is not limited to the following information:

- a) VULNERABILITY description, VULNERABILITY score as per CVSS or a similar system for ranking VULNERABILITIES, and affected PRODUCT version(s); and
- b) description of the resolution.

Note 1: The description of the resolution can include references to installation of SECURITY updates - see IEC 62443-4-1, cl 12.

Note 2: Timeliness is driven by authorities, applicable legislation, regulatory policy, PRODUCT SAFETY and, market forces. The strategy for handling third-party component VULNERABILITIES discovered by the PRODUCT developer should take into account the possibility of premature public disclosure by the third-party component supplier.

Note 3: This PROCESS may be implemented for example as a part of ISO 13485:2016 clause 7.2.3.

Note 4: see Clauses 4.2, 6.2 and 10.6

1286 **10.5 Periodic review of SECURITY defect management practice**

1287 The MANUFACTURER shall establish an ACTIVITY(S) for conducting periodic reviews of the  
1288 Software problem resolution PROCESS.

1289 Periodic reviews of the ACTIVITIES shall, at a minimum, examine SECURITY-related issues  
1290 managed through the PROCESS since the last periodic review to determine if the management  
1291 PROCESS was complete, efficient, and led to the resolution of each SECURITY-related issue.

1292 Periodic reviews of the SECURITY-related issue management PROCESS shall be conducted at  
1293 least annually or as part of monitoring, measurement and analysis of PROCESSES of ISO  
1294 13485:2016 clause 4.1.3.

1295

1296 Note: This ACTIVITY(S) may be implemented for example as a part of ISO 13485:2016 clause  
1297 5.6, Management review.

1298

1299 **10.6 ACCOMPANYING DOCUMENTS review**

1300 The MANUFACTURER shall establish an ACTIVITY(S) for identifying, characterizing and tracking to  
1301 closure SECURITY-related errors and omissions in all user manuals including the SECURITY  
1302 guidelines.

1303

1304 Note 1: This ACTIVITY(S) may be implemented for example as a part of ISO 13485:2016 clause  
1305 7.3, Design and development.

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## Annex A (informative) Rationale

IEC 62443 is a series of Industrial Automation and Controls Systems SECURITY specifications. This series is the successor of ISA-99 and a well-recognized set of SECURITY standards.

Industrial Automation and Control Systems (IACS) have a recognition for SAFETY and effectiveness, which are key properties that are also applicable to the field of HEALTH SOFTWARE.

This document addresses LIFECYCLE PROCESSES in responsibility of the MANUFACTURER and therefore takes the requirements of IEC 62443-4-1, as far as they...

- are relevant for HEALTH SOFTWARE
- specify a PROCESS-related requirement
- address the MANUFACTURER
- do not specify product capabilities
- do not specify documentation content for accompanying documents – which will be specified by IEC TR 60601-4-5

In order to extend existing LIFECYCLE PROCESSES for HEALTH SOFTWARE, these requirements have been arranged in a structure reflecting that of IEC 62304.

Implementation of IEC 62304 is not required for implementing the processes specified in this document. However, if a manufacturer identifies in their processes those activities specified in IEC 62304, it is easier to determine the related ACTIVITY(S) towards information security specified in this document.

The secure coding best practices for HEALTH SOFTWARE should include at a minimum:

- a) avoidance of potentially exploitable implementation constructs – implementation design patterns that are known to have SECURITY WEAKNESSES;
- b) avoidance of banned functions and coding constructs/design patterns – software functions and design patterns that should not be used because they have known SECURITY WEAKNESSES;  

Note: For common libraries and programming languages there are public lists of banned functions. Per secure coding standards, the MANUFACTURER can decide these or more functions.
- c) automated tool use and settings (for example, for static analysis tools);
- d) general secure coding practices (for example external secure coding standards);
- e) validity checking of all inputs that cross a trust boundary.
- f) error handling.

The MANUFACTURER should evaluate each type of alert from static analysis whether it justifies a code change.

The application of secure coding standards can be judged on a case-by-case basis.

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1352

## **Annex B (informative) Guidance on Implementation of SECURITY Lifecycle Activities**

1353

### **B.1 Overview**

1354 Information security of a PRODUCT containing software can be supported by functional SECURITY  
1355 CAPABILITIES of that software – typically implementing protection from, detection of, response  
1356 to and recovery from incidents that may compromise the CONFIDENTIALITY, INTEGRITY or  
1357 AVAILABILITY of the PRODUCT'S ASSETS.

1358 Although this standard focuses on software there are additional SECURITY considerations for  
1359 the physical device that the software is running on that should be included in all process  
1360 activities. Examples are to reduce physical interface ports, like JTAG or unused USB ports,  
1361 similar to limiting open network ports on a software level. Similarly, there are mitigations  
1362 provided by the device, such as physical locks to provide access control to internal media.

1363 The technical reports IEC TR 60601-4-5 and IEC TR 80001-2-2 give guidance towards the  
1364 identification and communication of such SECURITY CAPABILITIES. While these technical reports  
1365 address medical devices, their concepts and measures can easily be transferred to HEALTH  
1366 SOFTWARE.

1367 Another aspect is related to the lifecycle: MANUFACTURERS of HEALTH SOFTWARE can establish  
1368 PROCESSES that avoid or mitigate VULNERABILITIES or reduce their impact to the PRODUCTS'  
1369 INTENDED PURPOSE. Some PROCESSES – for instance requirements engineering and, THREAT  
1370 RISK ANALYSIS - link the perspective of functions with the view on processes. It is important to  
1371 understand that only the combination of both PRODUCT capabilities as well as measures in the  
1372 LIFECYCLE PROCESSES can provide effective information security.

1373

### **B.2 THREAT / RISK ANALYSIS (TRA)**

1374 Security incidents may affect the PRODUCT'S SAFETY or effectiveness. The specific relationship  
1375 between VULNERABILITIES and risks regarding SAFETY or effectiveness depends on the design,  
1376 implementation and purpose of the respective PRODUCT. A PRODUCT risk analysis for SAFETY  
1377 therefore must consider the effects of VULNERABILITIES to the key functions of the product. As a  
1378 part of that ACTIVITY(S), THREAT / RISK ANALYSIS is performed for HEALTH SOFTWARE.

1379 Those scenarios with an attacker exploiting a known vulnerability may be considered as  
1380 "foreseeable" with respect to product risk management. In case the USE ENVIRONMENT or other  
1381 mitigation controls might fail to prevent a certain type of attack, that scenario becomes  
1382 "foreseeable" from the MANUFACTURER'S perspective. TRA identifies and evaluates such threat  
1383 scenarios – taking into account

1384 a) the dedicated hardware with which the HEALTH SOFTWARE is intended to be used.

1385 b) the intended operational context and

1386 c) the potential data/control flows from external actors into the HEALTH SOFTWARE.

1387

### **B.3 Threat / Risk Management**

1388 One outcome of applying TRA is an evaluation of known vulnerabilities that may affect the  
1389 HEALTH SOFTWARE'S ASSETS (data, software functions, software services) with respect to  
1390 CONFIDENTIALITY, INTEGRITY or AVAILABILITY – and how that is related to the overall safety,  
1391 security and effectiveness of the product as a whole.

1392 The scenarios considered during TRA is not limited to those foreseen by the PRODUCT'S  
1393 intended use, however TRA takes the intended operational environment into account.

1394 Options for determining the acceptable RESIDUAL RISK with remaining VULNERABILITIES include  
1395 one or more of the following:

1396 a) fixing the issue through one or more of the following:

- 1397 1) defence in depth strategy or design change;  
1398 2) addition of one or more security requirements and/or capabilities;  
1399 3) use of compensating mechanisms; and/or  
1400 4) disabling or removing features; with respect to the safe and effective use of  
1401 HEALTH SOFTWARE;  
1402 b) creating a remediation plan to fix the problem;  
1403 c) deferring the problem for future resolution (reapply this requirement at some time in the  
1404 future) and specifying the reason(s) and associated risk(s);  
1405 d) not fixing the problem if the residual risk is below the established acceptable level of  
1406 residual risk.

1407 When the resolution decision is to fix the security-related issue in the PRODUCT implementation,  
1408 the timing of the release of the fix can result in a security update to be deferred until the next  
1409 release.

## 1410 **B.4 Software Development Planning**

### 1411 **B.4.1 Development process**

1412 An appropriate development PROCESS for HEALTH SOFTWARE should implement a development/  
1413 maintenance/ support process as required in IEC 62304 and additionally implement items of  
1414 the list specified in 5.1.1.

### 1415 **B.4.2 Development environment security**

1416 HEALTH SOFTWARE must be protected from any compromises via the development environment.  
1417 For instance, the introduction of malicious software or the theft of credentials such as software  
1418 signing certificates.  
1419  
1420

## 1421 **B.5 Health Software Requirements Analysis**

### 1422 **B.5.1 HEALTH SOFTWARE security requirements**

1423 This requirement assumes that a system at a higher level has already defined a security level  
1424 for this (sub)system. This is described per IEC 62443-3-2 in general and via IEC TR 60601-4-  
1425 5 for PEMS.  
1426

### 1427 **B.5.2 Security requirements review**

1428 The implementation of SECURITY CAPABILITIES may have an impact on the PRODUCT'S SAFETY or  
1429 effectiveness. This review may determine an appropriate requirement towards implementing  
1430 SECURITY CAPABILITIES in a balanced way.  
1431

## 1432 **B.6 Software Architectural Design**

### 1433 **B.6.1 Defense in depth architecture/design**

1434 Defense in depth is an approach to information security in which a series of defensive  
1435 mechanisms are layered in order to protect information ASSETS: If one mechanism fails, another  
1436 layer will thwart an attack. This multi-layered approach with intentional redundancies increases  
1437 the security of a system as a whole and addresses many different attack vectors. Defense in  
1438 depth is commonly referred to as the "castle approach" because it mirrors the layered defenses  
1439 of a medieval castle.

1440 Defense-in-depth reduces the likelihood of attacks to succeed, it reduces the impact of attacks  
1441 and allows the target system to take compensating actions.  
1442

### 1443 **B.6.2 Secure design principles**

1444 The principles described in this requirement are relevant to the design of any system, whether  
1445 for apps, client or server, cloud-based services, or Internet-of-Things devices. The specifics of

1446 their application will vary – a cloud service may require multiple administrative roles, each with  
1447 its own least privilege, while an IoT device will require special considerations of the need for  
1448 security updates and of the need to fail securely and safely.

1449 However, the principles are general and provide valuable security guidance for the designers  
1450 and architects of all classes of systems. Elements of such a process need additional  
1451 specifications that depend on the programming environment and the information technology  
1452 used. There are specifications from Standard-Developing Organisations (SDOs) or associations  
1453 with more detailed specifications (potentially depending on technology or context).

1454

### 1455 **B.6.3 Security architectural design review**

1456 The ability of an architecture to ensure stable and predictable behavior is important, because  
1457 adverse conditions can come intentionally or unintentionally; they may show up via adverse  
1458 calls / data when HEALTH SOFTWARE is being used in its USE ENVIRONMENT.

1459

## 1460 **B.7 Software Unit Implementation and Verification**

### 1461 **B.7.1 Secure Coding Standards**

1462 Secure coding standards should incorporate the following principles:

- 1463 • Establish coding standards and conventions
- 1464 • Use safe functions only
- 1465 • Use current compiler and toolchain versions and secure compiler options
- 1466 • Handle input and other data safely (i.e. in a restrictive, cautious way...)
- 1467 • Use source code analysis tools to find security issues early
- 1468 • Handle errors

1469

1470 From 5.5.2

1471

1472 Note 1: Source Code Analysis (SCA) detects the potential for errors such as buffer overflows,  
1473 null pointer dereferencing, and similar.

1474

1475 Note 2: SCA can be done using a tool if one is available for the language used. In addition,  
1476 static code analysis can be done on all source code changes including new source code.

1477

1478

### 1479 **B.7.2 Secure implementation**

1480 The manufacturer may foresee an architecture and design that allow for updating or substituting  
1481 cryptographic technology – for example. The goal here is to implement with cryptographic agility  
1482 in mind: encryption algorithms might potentially be broken at any time, even if they are  
1483 considered current best practices, and encryption libraries may have vulnerabilities that  
1484 undermine otherwise sound algorithms. In the example, a secure implementation should  
1485 ensure, that some encryption strategy specifies how applications and services should  
1486 implement their encryption to enable transition to new cryptographic mechanisms, libraries and  
1487 keys when the need arises.

1488

1489

### 1490 **B.7.3 Security testing**

1491 The manufacturer may foresee a (semi-)independent internal testing team and/or the use of a  
1492 third party security test organization. Individuals who are independent from the developers who  
1493 designed and implemented the security features must do the security testing. Section 5.7 on  
1494 Software System Testing provides the requirements and more detail related to security testing.  
1495 An overview of some automated and manual testing techniques includes:

#### 1496 **B.7.3.1 Vulnerability scanning**

1497 Vulnerability scanning is the automated detection of known vulnerabilities. Scanners will detect  
1498 installed software, open network ports, operating system configuration and other security  
1499 relevant information. Many vulnerability scanners allow for both authenticated and  
1500 unauthenticated scans. An authenticated scan means that the tool has administrative system

1501 credentials to bypass certain protections and will be able to assess the systems configuration  
1502 with much more detail and accuracy. OWASP maintains a list of Vulnerability Scanning Tools.

### 1503 **B.7.3.2 Input validation testing**

1504 Input validation testing tries to detect undesired system behavior when incorrect data or  
1505 excessive load of data are send to a system interface. Often automated tools are used and the  
1506 more specialized the tool is for a certain interface protocol, the more accurate the test results  
1507 will be. Examples are fuzz testing, buffer overflow and format error testing. Specialized injection  
1508 testing techniques exists for protocols such as SQL, LDAP, XML and cross-site scripting.

### 1509 **B.7.3.3 Penetration testing**

1510 Penetration testing, also called pen-testing, focuses specifically on compromising  
1511 confidentiality, integrity or availability. It can involve defeating multiple aspects of the defense  
1512 in depth design. For example, bypassing authentication to access the product, using elevation  
1513 of privilege to gain administrative access and then compromising confidentiality by breaking  
1514 encryption. As this example shows, penetration testing involves approaching testing like an  
1515 attacker and often involves exploiting chained vulnerabilities in a product using both tools and  
1516 manual skills. Results of the vulnerability scanning and other tests could provide valuable input  
1517 to develop manual attack scenarios.  
1518

## 1519 **B.8 Software Release**

### 1520 **B.8.1 Security measures expected in the environment**

1521 In HEALTH SOFTWARE there may be VULNERABILITIES for which compensating controls could be  
1522 inappropriate considering the safety and effectiveness of the product when used as intended.

1523 The product should anticipate its intended environment of use to a certain extent. A declaration  
1524 of external controls expected to be provided can be used to define shared responsibilities – for  
1525 example as specified in IEC TR 60601-4-5 and in IEC TR 80001-2-2 for which a well-established  
1526 guidance is published as ANSI MDS2.

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**Annex C**  
**(informative)**  
**References to other standards**

- 1531 ISO 27000 Information technology -- Security techniques -- Information security management  
1532 systems -- Requirements
- 1533 ISO 27034-3 Information technology -- Application security -- Part 3: Application security  
1534 management process
- 1535 ISO 27799 Health informatics -- Information security management in health using ISO/IEC  
1536 27002
- 1537
- 1538 IEC TR 60601-4-5 Medical electrical equipment – Part 4-5 Guidance and interpretation – Safety  
1539 related technical security specifications for medical devices
- 1540
- 1541 IEC 62304 Ed. 2: Health software - Software Lifecycle processes
- 1542
- 1543 IEC 62443-3-2 Security Risk Assessment and System Design
- 1544
- 1545 IEC 62443-3-3 System Requirements and Security Levels
- 1546
- 1547 IEC 62443-4-1 Secure Product Development Lifecycle Requirements
- 1548
- 1549 IEC 62443-4-2 Technical Security Requirements for IACS Components
- 1550
- 1551 IEC TR 80001-2-2 Application of Risk Management for IT-Networks incorporating Medical  
1552 Devices – Part 2-2: Guidance for the Disclosure and Communication of Medical Device Security  
1553 Needs, Risks and Controls,
- 1554
- 1555 IEC/ISO 80001-2-8 Application of Risk Management for IT-Networks incorporating Medical  
1556 Devices – Part 2-8: Application guidance - Guidance on Standards for Establishing the Security  
1557 Capabilities identified in IEC TR 80001-2-2
- 1558 ISO/IEC 81001-1 Health software and health IT systems safety, effectiveness and security -  
1559 Foundational principles, concepts and terms
- 1560 IEC 82304-1 Health software - Part 1: General requirements for product safety.
- 1561 Note: IEC 82304-1 specifies safety requirements for Health Software products (“stand-alone”).

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## **Annex D (informative) THREAT MODELLING**

### 1565 **D.1 General**

1566 THREAT MODELLING is a systematic approach for analyzing the SECURITY of an item in a  
1567 structural way such that VULNERABILITIES can be identified, enumerated, and prioritized, all from  
1568 a hypothetical attacker's point of view. THREAT MODELING can be applied to a wide range of  
1569 things, including software, devices, systems, networks, distributed systems and business  
1570 PROCESSES. THREAT MODELING typically employs a systematic approach to identify ATTACK  
1571 vectors and ASSETS most desired by an attacker. This leads to a decomposition of the item  
1572 (software, device, system, and so on) to look at each possible ATTACK vector and ASSET  
1573 individually and determine to which kind of ATTACKS they are vulnerable. From this, a list of  
1574 VULNERABILITIES can be created and ordered in terms of risk, potential to impact SAFETY,  
1575 effectiveness, or any other criteria deemed appropriate (like privacy).

1576 There are various approaches to creating a THREAT model that range from making a list of  
1577 known VULNERABILITIES to adopting a framework, some examples:

### 1578 **D.2 ATTACK-Defense Trees**

1579 An ATTACK-Defense Tree (ADTree) is a node-labeled rooted tree describing the measures an  
1580 attacker might take to ATTACK a system and the defenses that a defender can employ to protect  
1581 the system.

### 1582 **D.3 CAPEC / OWASP / SANS**

1583 A basic approach is to use lists of known top THREATS such as the OWASP Top 10 or the  
1584 CWE/SANS Top 25. The Common Attack Pattern Enumeration and Classification (CAPEC) has  
1585 a more comprehensive dictionary of known patterns of ATTACK employed by adversaries to  
1586 exploit known WEAKNESSES.

### 1587 **D.4 CWSS**

1588 The Common Weakness Scoring System (CWSS) both identifies VULNERABILITIES and provides  
1589 a scoring system to prioritize them. It is a collaborative, community-based effort that focuses  
1590 on analyzing software and reported bugs to determine the relative importance of the detected  
1591 WEAKNESSES.

### 1592 **D.5 DREAD**

1593 DREAD is a classification scheme for quantifying, comparing and prioritizing the amount of risk  
1594 presented by each evaluated THREAT. DREAD modelling focuses on risk rating. The DREAD  
1595 algorithm is used to compute a risk value, which is an average of all five categories: **D**amage,  
1596 **R**eproducibility, **E**xploitability, **A**ffected Users, and **D**iscoverability.

### 1597 **D.6 List Known Potential VULNERABILITIES**

1598 One may attempt listing all the VULNERABILITIES that could affect your system. While it is  
1599 impossible to list all potential VULNERABILITIES, one should concentrate those VULNERABILITIES  
1600 that could be exercised by known THREATS.

### 1601 **D.7 OCTAVE**

1602 OCTAVE is a heavyweight risk methodology approach originating from Carnegie Mellon  
1603 University's Software Engineering Institute (SEI) in collaboration with CERT. OCTAVE focuses  
1604 on organizational risk, not technical risk.

### 1605 **D.8 STRIDE**

1606 STRIDE is a model for system decomposition, by characterizing known THREATS according to  
1607 the kinds of EXPLOITS used. The STRIDE acronym stands for each of the categories: **S**poofing,

1608 Tampering, Repudiation, Information Disclosure, Denial of Service, and Elevation of Privilege.  
1609 STRIDE does not include a scoring system.

#### 1610 **D.9 Trike**

1611 Trike is a THREAT MODELING framework with similarities to the STRIDE and DREAD THREAT  
1612 MODELLING PROCESSES. Trike differs in that it uses a risk-based approach with distinct  
1613 implementation, THREAT, and risk models, instead of using the STRIDE/DREAD aggregated  
1614 THREAT model (ATTACKS, THREATS, and WEAKNESSES).

1615

#### 1616 **D.10 VAST**

1617 VAST is an acronym for Visual, Agile, and Simple THREAT MODELING. The principle of this  
1618 approach is the necessity of scaling the THREAT modeling PROCESS across the infrastructure  
1619 and entire software development LIFECYCLE. The approach integrates into an Agile software  
1620 development methodology. The methodology provides an application and infrastructure  
1621 visualization scheme such that the creation and use of THREAT models do not require specific  
1622 SECURITY subject matter expertise.

1623

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**Annex E**  
**(informative)**  
**Relation to practices in IEC 62443-4-1**

1628 **E.1 ISO/IEC 80001-5-1 to IEC 62443-4-1:2018**

1629

4.1.1	Not in 62443-4-1
4.1.2	SM-2
4.1.3	SM-3
4.2	Not in 62443-4-1
5.1.1	SM-1, SM-5
5.1.2	SM-7
5.1.3	SI-2
5.2.1	SR-3
5.2.1	SR-4
5.2.2	SR-5
5.2.2	SVV-5
5.2.3	SM-9
5.3.1	SD-2
5.3.2	SD-4
5.3.3	Not in 62443-4-1
5.4.1	Not in 62443-4-1
5.4.2	SD-1
5.4.3	SD-3
5.5.1	Not in 62443-4-1
5.5.2	SI-1
5.6	Not in 62443-4-1
5.7.1	SVV-1
5.7.2	SVV-2
5.7.3	SVV-3
5.7.4	SVV-4
5.8.1	Not in 62443-4-1
5.8.2	SG-5
5.8.2	SG-6

5.8.3	SM-6
5.8.4	SM-8
5.8.5	SM-11
5.8.6	SM-12
6.1.1	SUM-1
6.1.2	SUM-4
6.2.1	SUM-2
6.2.2	SUM-3
6.2.3	SUM-5
6.3	SG-4
7.1.1	SR-1
7.2	SR-2
7.3	Not in 62443-4-1
7.4	Not in 62443-4-1
7.5	Not in 62443-4-1
8	SM-1
9.2	DM-1
9.3	DM-2
9.4	DM-3
9.5	SM-4
10.1	SM-4
10.2	SM-10
10.3	SM-13
10.4	DM-5
10.5	DM-6
10.6	SG-7
Annex A	SI-2

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1631  
1632

Note: A specification of this document mapped to “not in 62443-4-1” should still reflect the intentions of IEC 62443-4-1.

1633 **E.2 IEC 62443-4-1:2018 to ISO/IEC 80001-5-1**

1634 Note that SG-# requirements are not included as stated in the purpose section 1.1 and in Annex  
 1635 A (rationale), this document excludes specification of ACCOMPANYING DOCUMENT contents.

1636

SM-1	5.1.1, 8
SM-2	4.1.2
SM-3	4.1.3
SM-4	10.1
SM-5	5.1.1
SM-6	5.8.3
SM-7	5.1.2
SM-8	5.8.4
SM-9	5.2.3
SM-10	10.2
SM-11	5.8.5
SM-12	5.8.6
SM-13	10.3
SR-1	7.1.1
SR-2	7.2
SR-3	5.2.1
SR-4	5.2.1
SR-5	5.2.2
SD-1	5.4.2
SD-2	5.3.1
SD-3	5.4.3
SD-4	5.3.2
SI-1	5.5.2
SI-2	5.1.3, Annex A

SVV-1	5.7.1
SVV-2	5.7.2
SVV-3	5.7.3
SVV-4	5.7.4
SVV-5	5.2.2
DM-1	9.2
DM-2	9.3
DM-3	9.4
SM-4	9.5
DM-5	10.4
DM-6	10.5
SUM-1	6.1.1
SUM-2	6.2.1
SUM-3	6.2.2
SUM-4	6.1.2
SUM-5	6.2.3
SG-1	-
SG-2	-
SG-3	-
SG-4	6.3
SG-5	5.8.2
SG-6	5.8.2
SG-7	10.6

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## **Annex F (informative) Document specified in IEC 62443-4-1**

1641 This annex specifies product-related documents which support the secure use of HEALTH  
1642 SOFTWARE.

1643 A manufacturer claiming conformance towards IEC 62443-4-1 can demonstrate conformance  
1644 to this document including this Annex on product-related documentation.

1645 The processes specified by this Annex are used to provide documentation that describes how  
1646 to integrate, configure and maintain the defense-in-depth strategy of the HEALTH SOFTWARE IN  
1647 accordance with its security context. Applying and maintaining the defense-in-depth strategy  
1648 for a specific HEALTH SOFTWARE installation will typically address the following:

- 1649
- 1650 1) Policies and procedures associated with the HEALTH SOFTWARE security  
1651 context,
  - 1652 2) Architectural considerations, such as firewall placement and the use of  
1653 compensating mechanisms including security measures
  - 1654 3) Configuring security settings/options such as configuring firewall rules and  
1655 managing user accounts,
  - 1656 4) Use of tools to assist in hardening HEALTH SOFTWARE

### 1657 **F.1 Release Documentation**

#### 1658 **F.1.1 HEALTH SOFTWARE defense in depth documentation**

1659 The MANUFACTURER shall establish an ACTIVITY to create HEALTH SOFTWARE documentation that  
1660 describes the compensating controls for the HEALTH SOFTWARE to support installation, operation  
1661 and MAINTENANCE that includes:

- 1662 a) SECURITY capabilities implemented by the HEALTH SOFTWARE and their role in the  
1663 defense in depth strategy;
- 1664 b) THREATS addressed by the defense in depth strategy;
- 1665 c) HEALTH SOFTWARE user mitigation strategies for known SECURITY risks associated with  
1666 the HEALTH SOFTWARE, including risks associated with LEGACY SOFTWARE.

1667

1668 Note 1: IEC TR 60601-4-5 gives guidance on the specification of SECURITY capabilities and their  
1669 documentation in the accompanying documents and provides a method of determining  
1670 requirements from the SECURITY CAPABILITY level.

1671

1672 Note 2: IEC TR 80001-2-2 specifies SECURITY-related needs, risks and controls as a guidance  
1673 for disclosure and communication between the MANUFACTURER and the HEALTHCARE DELIVERY  
1674 ORGANIZATION.

1675

#### 1676 **F.1.2 Defense in depth measures expected in the environment**

1677 The MANUFACTURER shall establish an ACTIVITY to create PRODUCT documentation that declares  
1678 external SECURITY controls expected to be provided or implemented by the external  
1679 environment.

1680

1681 Note: Software should not be placed on the market based on the assumption that all users have  
1682 some certain technical control in place.

1683

#### 1684 **F.1.3 SECURITY hardening guidelines**

1685 The MANUFACTURER shall establish an ACTIVITY to create HEALTH SOFTWARE documentation that  
1686 includes guidelines for hardening the HEALTH SOFTWARE when deploying, installing and  
1687 maintaining the HEALTH SOFTWARE. If applicable, the guidelines shall include but are not limited  
1688 to, instructions, rationale and recommendations for the following:

- 1689 a) Integration of the HEALTH SOFTWARE, including third-party components, into its HEALTH  
1690 SOFTWARE SECURITY context
- 1691 b) Integration of the HEALTH SOFTWARE'S application programming interfaces/protocols  
1692 with user applications;

- 1693 c) Applying and maintaining the HEALTH SOFTWARE'S defense in depth strategy
- 1694 d) Configuration and use of SECURITY options/capabilities in support of local SECURITY
- 1695 policies, and for each SECURITY option/ CAPABILITY:
- 1696 1) Its contribution to the HEALTH SOFTWARE'S defense in depth strategy
- 1697 2) Descriptions of configurable and default values that includes how each affects
- 1698 SECURITY along with any potential impact each has on work practices; and
- 1699 3) Setting/changing/deleting its value;
- 1700 e) Instructions and recommendations for the use of all SECURITY-related tools and utilities
- 1701 that support administration, monitoring, incident handling and evaluation of the
- 1702 SECURITY of the HEALTH SOFTWARE;
- 1703 f) Instructions and recommendations for periodic SECURITY MAINTENANCE activities;
- 1704 g) Instructions for reporting SECURITY incidents involving the HEALTH SOFTWARE to the
- 1705 MANUFACTURER; and
- 1706 h) Description of the SECURITY best practices for MAINTENANCE and administration of the
- 1707 HEALTH SOFTWARE.
- 1708

## 1709 **F.2 Documents for Decommissioning Health Software**

- 1710 The guidelines for Health Software Decommissioning shall include, but are not limited to
- 1711 instructions and recommendations for the following:
- 1712 a) removing the HEALTH SOFTWARE from its INTENDED ENVIRONMENT OF USE (see IEC 62443-
  - 1713 4-1, Clause 6, Practice 2 – Specification of SECURITY requirements);
  - 1714 b) removing patient and configuration data stored within the environment;
  - 1715 c) secure transfer, migration, archiving and deletion of data stored in the HEALTH
  - 1716 SOFTWARE; and
  - 1717 d) secure disposal of the HEALTH SOFTWARE to prevent potential disclosure of data
  - 1718 contained in the HEALTH SOFTWARE that could not be removed as described in c) above.
  - 1719