Manufacturer Disclosure Statement for Medical Device Security – MDS[2]			
DEVICE DESCRIPTION			
Device Category Specimen Radiography System	Manufacturer Hologic, Inc	Document ID MAN-03142	Document Release Date 3/12/2015
Device Model Trident	Software Revision 1.1		Software Release Date 8/14/2012

Manufacturer or Representative Contact Information	Company Name Hologic, Inc	Manufacturer Contact Information Greg.Amante@hologic.com
	Representative Name/Position Greg Amante	

Intended use of **device** in network-connected environment:

The Trident Specimen Radiography system is a point of care system used to image surgical and core biopsy specimens. The Trident system features an intuitive user interface ideal for non-technical operators, with one-touch X-ray automatic exposure control (AEC), a lighted specimen X-ray chamber and large active imaging area. The system incorporates easy-to-use software with a simple, yet robust tool set.

MANAGEMENT OF PRIVATE DATA

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

Management of
Private Data notes:

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SECURITY CAPABILITIES

Refer to Section 2.3.2 of this standard for the proper interpretation of information requested in this form.	Yes, No, N/A, or See Note	Note #

1 AUTOMATIC LOGOFF (ALOF)

The **device**'s ability to prevent access and misuse by unauthorized **users** if **device** is left idle for a period of time.

1-1 Can the **device** be configured to force reauthorization of logged-in **user**(s) after a predetermined length of inactivity (e.g., auto-logoff, session lock, password protected screen saver)?	Yes	__
1-1.1 Is the length of inactivity time before auto-logoff/screen lock **user** or administrator configurable? (Indicate time [fixed or configurable range] in notes.)	Yes	1 min
1-1.2 Can auto-logoff/screen lock be manually invoked (e.g., via a shortcut key or proximity sensor, etc.) by the **user**?	Yes	__

ALOF notes:

Inactivity logout interval configurable by customer.

2 AUDIT CONTROLS (AUDT)

The ability to reliably audit activity on the **device**.

2-1 Can the **medical device** create an **audit trail**?	Yes	__
2-2 Indicate which of the following events are recorded in the audit log:		
2-2.1 Login/logout	Yes	__
2-2.2 Display/presentation of data	Yes	__
2-2.3 Creation/modification/deletion of data	Yes	__
2-2.4 Import/export of data from **removable media**	Yes	__
2-2.5 Receipt/transmission of data from/to external (e.g., network) connection	Yes	__
2-2.5.1 **Remote service** activity	Yes	__
2-2.6 Other events? (describe in the notes section)	N/A	__
2-3 Indicate what information is used to identify individual events recorded in the audit log:		
2-3.1 **User** ID	Yes	__
2-3.2 Date/time	Yes	__

AUDT notes:

3 AUTHORIZATION (AUTH)

The ability of the device to determine the authorization of users.

3-1 Can the **device** prevent access to unauthorized **users** through **user** login requirements or other mechanism?	Yes	__
3-2 Can **users** be assigned different privilege levels within an application based on 'roles' (e.g., guests, regular **users**, power **users**, administrators, etc.)?	Yes	__
3-3 Can the **device** owner/**operator** obtain unrestricted administrative privileges (e.g., access operating system or application via local root or admin account)?	Yes	__

AUTH notes:

System supports individual operator accounts and differing operator roles (Technologic and Manager.) Manager level users can create new accounts and revoke existing accounts.

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4   CONFIGURATION OF SECURITY FEATURES (CNFS)

The ability to configure/re-configure **device security capabilities** to meet **users'** needs.

4-1	Can the **device** owner/operator reconfigure product **security capabilities**?	No	__

CNFS
notes:

5   CYBER SECURITY PRODUCT UPGRADES (CSUP)

The ability of on-site service staff, remote service staff, or authorized customer staff to install/upgrade **device**'s security patches.

5-1	Can relevant OS and **device** security patches be applied to the **device** as they become available?	No	__
	5-1.1 Can security patches or other software be installed remotely?	No	__

CSUP
notes:

6   HEALTH DATA DE-IDENTIFICATION (DIDT)

The ability of the **device** to directly remove information that allows identification of a person.

6-1	Does the **device** provide an integral capability to de-identify **private data**?	Yes	__

DIDT
notes:

7   DATA BACKUP AND DISASTER RECOVERY (DTBK)

The ability to recover after damage or destruction of **device** data, hardware, or software.

7-1	Does the **device** have an integral data backup capability (i.e., backup to remote storage or **removable media** such as tape, disk)?	No	__

DTBK
notes: System only acts as a temporary store of patient data before it is transmitted to PACS. Any disaster recovery will be performed by Hologic Service.

8   EMERGENCY ACCESS (EMRG)

The ability of **device users** to access **private data** in case of an emergency situation that requires immediate access to stored **private data**.

8-1	Does the **device** incorporate an **emergency access** ("break-glass") feature?	No	__

EMRG
notes:

9   HEALTH DATA INTEGRITY AND AUTHENTICITY (IGAU)

How the **device** ensures that data processed by the **device** has not been altered or destroyed in an unauthorized manner and is from the originator.

9-1	Does the **device** ensure the integrity of stored data with implicit or explicit error detection/correction technology?	No	__

IGAU
notes:

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10   MALWARE DETECTION/PROTECTION (MLDP)

The ability of the **device** to effectively prevent, detect and remove malicious software (**malware**).

10-1	Does the **device** support the use of **anti-malware** software (or other **anti-malware** mechanism)?	Yes __
	10-1.1 Can the **user** independently re-configure **anti-malware** settings?	Yes __
	10-1.2 Does notification of **malware** detection occur in the **device user** interface?	No __
	10-1.3 Can only manufacturer-authorized persons repair systems when **malware** has been detected?	Yes __
10-2	Can the device owner install or update **anti-virus software**?	Yes __
10-3	Can the device owner/**operator** (technically/physically) update virus definitions on manufacturer-installed **anti-virus software**?	Yes __

MLDP notes: Hologic Validates most general Anti-Virus/Anti-Malware packages and provides instructions for installation by the customer. Automatic virus definition updates are supported.

11   NODE AUTHENTICATION (NAUT)

The ability of the **device** to authenticate communication partners/nodes.

11-1	Does the **device** provide/support any means of node authentication that assures both the sender and the recipient of data are known to each other and are authorized to receive transferred information?	No __

NAUT notes:

12   PERSON AUTHENTICATION (PAUT)

Ability of the **device** to authenticate **users**

12-1	Does the **device** support **user/operator**-specific username(s) and password(s) for at least one **user**?	Yes __
	12-1.1 Does the device support unique **user/operator**-specific IDs and passwords for multiple users?	Yes __
12-2	Can the **device** be configured to authenticate **users** through an external authentication service (e.g., MS Active Directory, NDS, LDAP, etc.)?	No __
12-3	Can the **device** be configured to lock out a **user** after a certain number of unsuccessful logon attempts?	No __
12-4	Can default passwords be changed at/prior to installation?	Yes __
12-5	Are any shared **user** IDs used in this system?	No __
12-6	Can the **device** be configured to enforce creation of **user** account passwords that meet established complexity rules?	Yes __
12-7	Can the **device** be configured so that account passwords expire periodically?	No __

PAUT notes:

13   PHYSICAL LOCKS (PLOK)

Physical locks can prevent unauthorized **users** with physical access to the **device** from compromising the integrity and confidentiality of **private data** stored on the **device** or on **removable media**.

13-1	Are all **device** components maintaining **private data** (other than **removable media**) physically secure (i.e., cannot remove without tools)?	No __

PLOK notes:

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Device Model	Software Revision		Software Release Date
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14 ROADMAP FOR THIRD PARTY COMPONENTS IN DEVICE LIFE CYCLE (RDMP)

Manufacturer's plans for security support of 3rd party components within **device** life cycle.

14-1	In the notes section, list the provided or required (separately purchased and/or delivered) operating system(s) - including version number(s).	Yes	1
14-2	Is a list of other third party applications provided by the manufacturer available?	No	

RDMP notes: Microsoft Windows 7 Professional SP1. No third party software besides the OS installed.

15 SYSTEM AND APPLICATION HARDENING (SAHD)

The **device**'s resistance to cyber attacks and **malware**.

15-1	Does the **device** employ any hardening measures? Please indicate in the notes the level of conformance to any industry-recognized hardening standards.	Yes	
15-2	Does the **device** employ any mechanism (e.g., release-specific hash key, checksums, etc.) to ensure the installed program/update is the manufacturer-authorized program or software update?	No	__
15-3	Does the **device** have external communication capability (e.g., network, modem, etc.)?	Yes	__
15-4	Does the file system allow the implementation of file-level access controls (e.g., New Technology File System (NTFS) for MS Windows platforms)?	Yes	__
15-5	Are all accounts which are not required for the **intended use** of the **device** disabled or deleted, for both **users** and applications?	Yes	__
15-6	Are all shared resources (e.g., file shares) which are not required for the **intended use** of the **device**, disabled?	Yes	__
15-7	Are all communication ports which are not required for the **intended use** of the **device** closed/disabled?	No	__
15-8	Are all services (e.g., telnet, file transfer protocol [FTP], internet information server [IIS], etc.), which are not required for the **intended use** of the **device** deleted/disabled?	Yes	__
15-9	Are all applications (COTS applications as well as OS-included applications, e.g., MS Internet Explorer, etc.) which are not required for the **intended use** of the **device** deleted/disabled?	Yes	__
15-10	Can the **device** boot from uncontrolled or **removable media** (i.e., a source other than an internal drive or memory component)?	Yes	__
15-11	Can software or hardware not authorized by the **device** manufacturer be installed on the device without the use of tools?	Yes	__

SAHD notes: The Product Development Life Cycle (PDLC) of the device incorporates numerous security scans and other vulnerability accessments which are incorporated into the product design.

16 SECURITY GUIDANCE (SGUD)

The availability of security guidance for **operator** and administrator of the system and manufacturer sales and service.

16-1	Are security-related features documented for the **device user**?	No	__
16-2	Are instructions available for **device**/media sanitization (i.e., instructions for how to achieve the permanent deletion of personal or other sensitive data)?	Yes	

SGUD notes: Hologic provides a Cyber Security Best Practices document on its website that provides recommendations on network security with the Trident product. Instructions for sanitation included in user manual.

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17 HEALTH DATA STORAGE CONFIDENTIALITY (STCF)

The ability of the **device** to ensure unauthorized access does not compromise the integrity and confidentiality of **private data** stored on **device** or **removable media**.

17-1	Can the **device** encrypt data at rest?	No __

STCF notes: System is only a temporary store of ePHI. System can be configured to automatically remove studies shortly after completion and successful transmission to PACS, and supports manual removal of patient records.

18 TRANSMISSION CONFIDENTIALITY (TXCF)

The ability of the **device** to ensure the confidentiality of transmitted **private data**.

18-1	Can **private data** be transmitted only via a point-to-point dedicated cable?	No __
18-2	Is **private data** encrypted prior to transmission via a network or **removable media**? (If yes, indicate in the notes which encryption standard is implemented.)	No __
18-3	Is **private data** transmission restricted to a fixed list of network destinations?	Yes __

TXCF notes: Device can be configured to only transmit to specific IP addresses. DICOM provides no native method to encrypt data, but TLS can be used on a local network.

19 TRANSMISSION INTEGRITY (TXIG)

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

19-1	Does the **device** support any mechanism intended to ensure data is not modified during transmission? (If yes, describe in the notes section how this is achieved.)	No __

TXIG notes:

20 OTHER SECURITY CONSIDERATIONS (OTHR)

Additional security considerations/notes regarding **medical device** security.

20-1	Can the **device** be serviced remotely?	Yes __
20-2	Can the **device** restrict remote access to/from specified devices or **users** or network locations (e.g., specific IP addresses)?	Yes __
	20-2.1 Can the **device** be configured to require the local **user** to accept or initiate remote access?	No __

OTHR notes: