An Overview of Global Professional Publications related to Medical Device Cybersecurity

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Abstract. The purpose of this paper is to provide an overview of the current professional literature about medical device cybersecurity from a regulatory point of view and at the global level. This paper provides the most comprehensive overview of such publications to date. It may assist healthcare, medical device, regulatory affairs, quality management, and cybersecurity professionals, researchers, regulators, and other subject matter experts in identifying applicable cybersecurity regulations, standards, and industry best practices for medical devices.

Keywords. cybersecurity, FDA, guidance, medical devices, regulation, standard

1 Introduction

Medical device companies are operating in a highly regulated industry and need to comply with applicable laws and regulations on data privacy protection and cybersecurity. In the past, medical devices were mostly designed and developed as non-networked devices. The main focus was on general safety and performance requirements, and less on security. Nowadays, medical devices often incorporate thirdparty hardware and software components and we observe an increase in use of wireless, Internet connected, networked, and interconnected medical devices. The expanded use of smartphones, tablets, wearable devices, and cloud services has fostered the development of Internet of Medical Things (IoMT) in the last few years. Due to the growing number of networked medical devices, which can be vulnerable to a wide variety of security threats, medical device manufacturers should address security management from initial device conception to disposal. Together, these trends have resulted in an increase in professional publications (i.e., national laws and regulations, standards, guidance documents, technical (information) reports, trend reports, white practices, industry frameworks, papers, best playbooks, information for consumers, etc.) to

strengthen cybersecurity requirements for medical devices at the global level.

This paper aims to provide an overview of the current professional publications related to medical device cybersecurity across the globe. Related work is provided in section 2. Section 3 presents the results of conducted narrative literature review. The final section gives a brief summary and discussion of the findings, and identifies areas for further research.

2 Related Work

In 2005, the Food and Drug Administration (FDA), a federal agency of the United States, issued a first guidance document about cybersecurity for networked medical devices containing off-the-shelf software. This guidance (FDA, 2005) recommends validating computer software changes to address cybersecurity vulnerabilities and developing a cybersecurity maintenance plan.

In June 2013, the FDA issued a draft guidance document that addresses management cvbersecurity in medical devices throughout the premarket phase. The final guidance was released by the FDA in October 2014. In this final guidance, the FDA (2014) defines cybersecurity as the process of preventing unauthorized access, modification, misuse or denial of use, or the unauthorized use of information that is stored, accessed, or transferred from a medical device to an external recipient. In October 2018, the FDA updated the premarket guidance. This draft guidance (FDA, 2018) also includes some postmarket recommendations.

In December 2016, the FDA published a second guidance that addresses management of cybersecurity in medical devices during the postmarket phase. this guidance (FDA, According to cybersecurity applies to the following types of medical devices: a) devices that contain software, firmware, or programmable logic, b) software that is a device, medical including mobile medical applications, c) interoperable devices,

marketed and distributed legacy devices. Over the last three years, many countries around the world published their own regulatory guidelines about cybersecurity of medical devices.

At the moment, there are many standards about information security management and standards covering different aspects of cybersecurity such as vulnerability disclosure, vulnerability handling processes, risk management for IT-networks incorporating medical devices, etc., that can be adopted by medical device manufacturers and healthcare organizations. There is a lack of an international consensus cybersecurity standard that is solely focused on the medical device industry. The International Electrotechnical Commission (IEC), the international standards and conformity assessment body for all fields of electrotechnology, is developing a new standard IEC/DIS 80001-1 (IEC/DIS 80001-1: effectiveness and security implementation and use of connected medical devices or connected health software – Part 1: Application of risk management, 2020) to support medical device manufacturers with respect to security risk management for connected medical devices and connected health software.

While there are many scientific papers about current international standards and trends of medical device cybersecurity, to the best of the author's knowledge, they only focus on: a) one or more professional publications (Anonymous, (Baranchuk et al., 2018), (Brown et al., 2016), (Jagannathan & Sorini, 2015), (Jump, 2019), (Jump & Finnegan, 2017), (Mankovich & Fitzgerald, 2011), (Murthy, 2019), (Sametinger et al., 2015), (Schwartz et al., 2018), (Stern, 2017), (Stern et al., 2019), (Vargas, 2017), (Walker, 2018), (Wu & Eagles, 2016), b) major countries (Chen et al., 2018), (Fu & Blum, 2013), (Kim et al., 2020), c) a particular geographic area (Abraham et al., 2019), (Best, 2020), (Burns et al., 2016), (Coburn, 2016), (Martinez, 2018), (Owens, 2016), (Pasanisi, 2017), (Pesapane et al., 2018), (Skierka, 2018), (Webb & Dayal, 2017), d) particular types of medical devices (Carroll & Richardson, 2016), (Gladden, 2016), (Hrgarek, 2012), (Hrgarek Lechner, 2017), (Pirker & Hrgarek Lechner, 2019), (Yuan et al., 2018), e) a particular ability of medical devices (Hatcliff et al., 2019), (Hrgarek Lechner, 2018), or f) a particular activity of the cybersecurity process (Arbelaez et al., 2018), (Jiang et al., 2020), (Moshi et al., 2019), (Suárez & Scott, 2017). No paper has been found that provided a comprehensive overview of professional medical device cybersecurity publications at the global level.

3 Narrative Literature Review

The purpose of the conducted narrative literature review was to identify relevant professional publications related to medical device cybersecurity across the globe. The scope of this review was limited to English and German professional publications that were published in the time period from August 1996 to August 2020. August 1996 was chosen because the Health Insurance Portability and Accountability Act of 1996, the U.S. federal law that requires the protection of sensitive patient health information, was published at this time. Literature search was performed using: a) e-mail notifications from FDA and normScan (an online monitoring and tracking tool for new and updated medical device standards), b) searches in IEC and ISO webstores, c) various keyword searches in Google web search engine, and d) content shared on the LinkedIn platform by the TÜV SÜD (a notified body in Germany), the British Standards Institution (the UK national standards body), and regulatory affairs professionals in the medical device industry. Some publications were identified in scientific papers referenced in the previous section.

As listed in Table 1, a total of 156 relevant professional publications addressing cybersecurity for medical devices were searched. This table provides the most comprehensive overview of global professional publications from various sources to date and indicates the complexity of the evolving medical device cybersecurity ecosystem in a highly regulated environment. Since cybersecurity in the medical device industry requires shared responsibility among stakeholders (e.g., medical device manufacturers, healthcare providers, patients, security researchers, etc.), a number of laws, regulations, standards, guidance documents, and other types of publications is currently needed to cover the entire device life cycle.

Maintaining compliance with other regulatory requirements in the medical device industry, such as a risk management process or a usability engineering process, is easier due to a relatively small number of regulations and standards. For example, ISO 14971 (ISO 14971: Medical devices – Application of risk management to medical devices, 2019) is an international, harmonized standard for a risk management process that has been specifically designed for the medical device industry. The standard has been recognized as a consensus standard by international regulators such as the FDA and the Australian Therapeutic Goods Administration (TGA).

Table 1. An overview of global professional publications related to medical device cybersecurity

| Area/country | Publisher name | Publication title | Publication type | Year |
|--------------|----------------------|--|------------------|------|
| Australia | Therapeutic Goods | Medical device cyber security guidance for industry, Version 1.0 | Guidance | 2019 |
| | Administration (TGA) | Medical device cyber security guidance for | Guidance | 2019 |

| Area/country | Publisher name | Publication title | Publication type | Year |
|------------------------|--|--|----------------------|------|
| | | users, Version 1.0 | | |
| | | Medical device cyber security – Consumer information | Consumer information | 2019 |
| Canada | Health Canada | Guidance Document: Pre-market Requirements for Medical Device Cybersecurity | Guidance | 2019 |
| China | China Food and Drug Administration (CFDA) | Medical Device Network Security Registration on Technical Review Guidance Principle | Guidance | 2017 |
| | | Directive (EU) 2016/1148 – Measures for a high common level of security of network and information systems across the Union | Directive | 2016 |
| | | Regulation (EU) 2016/679 – General Data Protection Regulation (GDPR) | Regulation | 2016 |
| | European Parliament and the Council | Regulation (EU) 2017/745 – Medical Devices Regulation (MDR) | Regulation | 2017 |
| | | Regulation (EU) 2017/746 – In Vitro Diagnostic Medical Devices Regulation (IVDR) | Regulation | 2017 |
| | | Regulation (EU) 2019/881 – Cybersecurity Act | Regulation | 2019 |
| European Union (EU) | European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry (COCIR) | Advancing Cybersecurity of Health and Digital Technologies | White paper | 2019 |
| | European Committee for Electrotechnical Standardization | EN 45502-1:2015 Implants for surgery – Active implantable medical devices. Part 1: General requirements for safety, marking and for information to be provided by the manufacturer | Standard | 2015 |
| | European Union Agency for Network | Baseline Security Recommendations for IoT in the context of Critical Information Infrastructures | Information report | 2017 |
| | and Information Security (ENISA) | PROCUREMENT GUIDELINES FOR CYBERSECURITY IN HOSPITALS: Good practices for the security of Healthcare services | Guidance | 2020 |
| | Medical Device Coordination Group (MDCG) | MDCG 2019-16 - Guidance on Cybersecurity for medical devices | Guidance | 2019 |
| France | National Agency for Medicines and Health Products Safety (ANSM) | ANSM's guideline – Cybersecurity of medical devices integrating software during their life cycle ^a | Guidance | 2019 |
| | Expertenkreis CyberMed | Sicherheit von Medizinprodukten: Leitfaden zur Nutzung des MDS2 aus 2019 | Guidance | 2019 |
| Germany | Federal Institute for Drugs and Medical Devices | Das Fast-Track-Verfahren für digitale Gesundheitsanwendungen (DiGA) nach § 139e SGB V: Ein Leitfaden für Hersteller, Leistungserbringer und Anwender | Guidance | 2020 |
| | | Gesetz für eine bessere Versorgung durch Digitalisierung und Innovation (Digitale- Versorgung-Gesetz – DVG) | Law | 2019 |
| | Federal Ministry of Health | Verordnung über das Verfahren und die Anforderungen zur Prüfung der Erstattungsfähigkeit digitaler Gesundheitsanwendungen in der gesetzlichen Krankenversicherung (Digitale Gesundheitsanwendungen-Verordnung – DiGAV) | Regulation | 2020 |
| | Federal Office for Information Security | BSI-CS 132 Cyber Security Requirements for Network-Connected Medical Devices, Version 1.1 | Best practices | 2018 |
| | (BSI) | BSI TR-03161 Sicherheitsanforderungen an | Technical | 2020 |

| Area/country | Publisher name | Publication title | Publication type | Year |
|---------------|---|---|------------------|------|
| | | digitale Gesundheitsanwendungen, Version 1.0 | guidance | |
| | TÜV Rheinland, OpenSky | AN INTRODUCTION TO MEDICAL DEVICE CYBER SECURITY: A European Perspective | White paper | 2016 |
| | | Cybersecurity Trends 2018: Cybersecurity in einer zunehmend digitalen Welt | Trend report | 2018 |
| | TÜV Rheinland | Cybersecurity Trends 2020: New thinking on cybersecurity and privacy in a world where digital transformation beckons | Trend report | 2020 |
| | TÜV SÜD, Johner Institute, Dr. Georg Heidenreich | IT Security Guideline for Medical Devices | Guidance | 2018 |
| | Verband der Diagnostica-Industrie (VDGH) | IT-Product Security Whitepaper Template, Version 1.4 | White paper | 2020 |
| | Advanced Medical Technology Association (AdvaMed) | AdvaMed Medical Device Cybersecurity Foundational Principles | Guidance | 2017 |
| | | Top 10 Health Technology Hazards for 2020 | Executive brief | 2019 |
| | | 2019 Top 10 Health Technology Hazard | Executive brief | 2018 |
| | | Top 10 Health Technology Hazards for 2018 | Executive brief | 2017 |
| | | Top 10 Health Technology Hazards for 2017 | Executive brief | 2016 |
| | ECRI Institute | Top 10 Health Technology Hazards for 2016 | Executive brief | 2015 |
| | | Top 10 Health Technology Hazards for 2015 | Executive brief | 2014 |
| | | Top 10 Health Technology Hazards for 2014 | Executive brief | 2013 |
| | | Top 10 Health Technology Hazards for 2013 | Executive brief | 2012 |
| | EPFL International Risk Governance Center (IRGC) | Governing cybersecurity risks and benefits of the Internet of Things: Connected medical & health devices and connected vehicles | Workshop report | 2017 |
| | Frost & Sullivan, Inc. | Medical Device and Network Security: Coming to terms with the Internet of Medical Things (IoMT) | White paper | 2019 |
| International | Global Digital Health Partnership (GDHP) Cybersecurity Workstream | Medical Device Manufacturer Internet of Things (IoT) Code of Conduct ^a | Guidance | 2020 |
| memunona | Healthcare Information and Management Systems Society (HIMSS) | HIMSS Privacy Impact Assessment Guide, Version 2 | Guidance | 2008 |
| | IEEE Cybersecurity Initiative (CYBSI) | Building Code for Medical Device Software Security | Report | 2015 |
| | IEEE Standards Association (SA) | P11073-40102 - IEEE Draft Standard - Health informatics - Device interoperability - Part 40102: Cybersecurity - Capabilities for Mitigation ^a | Standard | 2019 |
| | Integrating the Healthcare Enterprise | Medical Equipment Management (MEM): Cyber Security, Revision 2.0 | White paper | 2011 |
| | (IHE) Patient Care Device (PCD) Technical Committee | Medical Equipment Management (MEM): Medical Device Cyber Security – Best Practice Guide, Revision 1.1 | White paper | 2015 |
| | IHE PCD Technical Committee, Medical Device Innovation, Safety, & Security Consortium (MDISS) | Medical Device Software Patching, Revision 1.1 | White paper | 2015 |
| | International Electrotechnical | IEC 62304:2006 + AMD1:2015 Medical device software – Software life cycle processes | Standard | 2015 |
| | Commission (IEC) | IEC/DIS 62304.2 Health software – Software life cycle processes ^b | Standard | |

| Area/country | Publisher name | Publication title | Publication type | Yea |
|--------------|-----------------------|--|------------------|------|
| | | IEC 82304-1:2016 Health software – Part 1: | Standard | 2016 |
| | | General requirements for product safety | Standard | 2010 |
| | | IEC 80001-1:2010 Application of risk | | |
| | | management for IT-networks incorporating | Standard | 2010 |
| | | medical devices – Part 1: Roles, responsibilities | | |
| | | and activities | | |
| | | IEC/DIS 80001-1 Safety, effectiveness and | | |
| | | security in the implementation and use of | a | |
| | | connected medical devices or connected health | Standard | |
| | | software – Part 1: Application of risk | | |
| | | management | | |
| | | IEC/TR 80001-2-1:2012 Application of risk | | |
| | | management for IT-networks incorporating | T1:1 | 201/ |
| | | medical devices – Part 2-1: Step by Step Risk | Technical report | 2012 |
| | | Management of Medical IT-Networks; Practical | | |
| | | Applications and Examples | | |
| | | IEC/TR 80001-2-2:2012 Application of risk | | |
| | | management for IT-networks incorporating | Т1:1 | 201/ |
| | | medical devices – Part 2-2: Guidance for the | Technical report | 2012 |
| | | communication of medical device security | | |
| | | needs, risks and controls | | |
| | | IEC/TR 80001-2-3:2012 Application of risk | | |
| | | management for IT-networks incorporating medical devices – Part 2-3: Guidance for | Technical report | 201 |
| | | wireless networks | | |
| | | <u> </u> | | |
| | | IEC/TR 80001-2-4:2012 Application of risk | | |
| | | management for IT-networks incorporating medical devices – Part 2-4: General | Tachnical report | 201 |
| | | | Technical report | 201 |
| | | implementation guidance for Healthcare | | |
| | | Delivery Organizations IEC/TR 20001 2 2:2016 Application of sight | | |
| | | IEC/TR 80001-2-8:2016, Application of risk management for IT-networks incorporating | Technical report | |
| | | medical devices – Part 2-8: Application | | |
| | | guidance – Guidance on standards for | | 201 |
| | | establishing the security capabilities identified | | |
| | | in IEC 80001-2-2 | | |
| | | IEC/CD 80001-5-1 Safety, security and | | |
| | | effectiveness in the implementation and use of | Standard | |
| | | connected medical devices or connected health | | |
| | | software – Part 5-1: Security Activities in the | | |
| | | product lifecycle ^b | | |
| | | IEC/TR 60601-4-5 ED1 Medical electrical | | |
| | | equipment – Part 4-5 Guidance and | | |
| | | interpretation – Safety related technical security | Technical report | |
| | | specifications for medical devices ^b | | |
| | | ISO/AWI TS 82304-2 Health software – Part 2: | | |
| | | Health and wellness apps – Quality and | Standard | |
| | | reliability ^b | | |
| | | ISO/CD TR 11633-2 Health informatics – | | |
| | | Information security management for remote | | |
| | | maintenance of medical devices and medical | T 1 ' 1 | |
| | | information systems – Part 2: Implementation | Technical report | |
| | | of an information security management system | | |
| | T | (ISMS) ^b | | |
| | International | ISO/DIS 81001-1 Health software and health | | |
| | Organization for | IT systems safety, effectiveness and security – | Standard | |
| | Standardization (ISO) | Part 1: Principles, concepts, and terms ^b | | |
| | | ISO 13485:2016 Medical devices – Quality | | |
| | | management systems – Requirements for | Standard | 201 |
| | | regulatory purposes | | _01 |
| | | ISO 14971:2019 Medical devices – Application | | |
| | | of risk management to medical devices | Standard | 2019 |
| | | ISO 27799:2016 Health informatics – | | |
| | | Information security management in health | Standard | 2016 |
| | | using ISO/IEC 27002 | uu | |

| Area/country | Publisher name | Publication title | Publication type | Year |
|--------------|---|--|------------------|------|
| | | ISO/TR 22696:2020 Health informatics – Guidance on the identification and authentication of connectable Personal Healthcare Devices (PHDs) | Technical report | 2020 |
| | | ISO/TR 24971:2020 Medical devices – Guidance on the application of ISO 14971 | Technical report | 2020 |
| | | ISO/TR 80001-2-7:2015 Application of risk management for IT-networks incorporating medical devices – Application guidance – Part 2-7: Guidance for healthcare delivery organizations (HDOs) on how to self-assess their conformance with IEC 80001-1 | Technical report | 2015 |
| | | ISO/TS 11633-1:2019 Health informatics – Information security management for remote maintenance of medical devices and medical information systems – Part 1: Requirements and risk analysis | Standard | 2019 |
| | | ISO/IEC 27000:2018 Information technology – Security techniques – Information security management systems – Overview and vocabulary | Standard | 2018 |
| | | ISO/IEC 27001:2013 Information technology – Security techniques – Information security management systems – Requirements | Standard | 2013 |
| | | ISO/IEC CD 27002 Information security, cybersecurity and privacy protection – Information security controls ^b | Standard | |
| | | ISO/IEC 27003:2017 Information technology – Security techniques – Information security management systems – Guidance | Standard | 2017 |
| | | ISO/IEC 27005:2018 Information technology – Security techniques – Information security risk management | Standard | 2018 |
| | | ISO/IEC 27017:2015 Information technology – Security techniques – Code of practice for information security controls based on ISO/IEC 27002 for cloud services | Standard | 2015 |
| | ISO, IEC | ISO/IEC 27032:2012 Information technology – Security techniques – Guidelines for cybersecurity | Standard | 2012 |
| | ISO, IEC | ISO/IEC 27035-1:2016 Information technology – Security techniques – Information security incident management – Part 1: Principles of incident management | Standard | 2016 |
| | | ISO/IEC 27035-2:2016 Information technology – Security techniques – Information security incident management – Part 2: Guidelines to plan and prepare for incident response | Standard | 2016 |
| | | ISO/IEC 27039:2015 Information technology – Security techniques – Selection, deployment and operations of intrusion detection and prevention systems (IDPS) | Standard | 2015 |
| | | ISO/IEC 29134:2017 Information technology – Security techniques – Guidelines for privacy impact assessment | Standard | 2017 |
| | | ISO/IEC 29147:2018 Information technology – Security techniques – Vulnerability disclosure | Standard | 2018 |
| | | ISO/IEC 29151:2017 Information technology – Security techniques – Code of practice for personally identifiable information protection | Standard | 2017 |
| | | ISO/IEC 30111:2019 Information technology – Security techniques – Vulnerability handling processes | Standard | 2019 |
| | International Medical Device Regulators | IMDRF Principles and Practices for Medical Device Cybersecurity | Guidance | 2020 |

| Area/country | Publisher name | Publication title | Publication type | Year |
|----------------------|---|--|---------------------|------|
| | Forum (IMDRF) | | | |
| | Joint NEMA/COCIR/JIRA Security and Privacy Committee (SPC) | Patching Off-the-Shelf Software Used in Medical Information Systems | White paper | 2004 |
| | Open Web Application Security Project (OWASP) | OWASP Secure Medical Device Deployment Standard | Standard | 2017 |
| _ | Pharmaceuticals and | Ensuring Cyber Security of Medical Devices | Notification | 2015 |
| Japan | Medical Devices Agency (PMDA) | Guidance on Ensuring Cyber Security of Medical Device | Guidance | 2018 |
| | Medical Council of New Zealand | Telehealth | Statement | 2020 |
| | | HISO 10029:2015 Health Information Security Framework | Standard | 2015 |
| N 7 1 1 | | HISO 10037.1 Connected Health Architectural Framework | Standard | 2010 |
| New Zealand | Ministry of Health | HISO 10037.2 Network to Network Interface Specifications | Standard | 2010 |
| | | HISO 10037.3:2015 User to Network Interface Specifications | Standard | 2015 |
| | | HISO 10064:2017 Health Information Governance Guidelines | Standard | 2017 |
| Republic of Korea | Korea Internet & Security Agency | Cyber Security Guide for Smart Medical Service | Guidance | 2018 |
| | Saudi Food and Drug Authority (SFDA) | MDS – G36 Guidance to Medical Devices Cybersecurity for Healthcare Providers, Version 1.0 | Guidance | 2019 |
| Saudi Arabia | | MDS – G37 Guidance to Post-Market Cybersecurity of Medical Devices, Version 1.0 | Guidance | 2019 |
| | | MDS – G38 Guidance to Pre-Market Cybersecurity of Medical Devices, Version 2.0 | Guidance | 2019 |
| | Cyber Security Agency of Singapore (CSA) | Security-by-Design Framework, Version 1.0 | Framework | 2017 |
| Singapore | Health Sciences Authority (HSA) | Regulatory Guidelines for Software Medical Devices – A Lifecycle Approach | Guidance | 2019 |
| | Enterprise Singapore | TR 67: 2018 Connected medical device security | Technical reference | 2018 |
| C.v.itaanland | allaalth Swiggs | Guide for app developers, manufacturers, and distributors | Guidance | 2018 |
| Switzerland | eHealth Suisse | Checklists: Addendum to the guideline for app developers, manufacturers and distributors | Checklist | 2018 |
| Taiwan | Ministry of Health and Welfare | Guidance on Management of Cybersecurity in Medical Devices for Manufacturers | Guidance | 2019 |
| | British Standards Institution (BSI) | Cybersecurity of medical devices: Addressing patient safety and the security of patient health information | White paper | 2017 |
| United Kingdom | Department for Digital, Culture, Media & Sport (DCMS) | Code of Practice for Consumer IoT Security | Guidance | 2018 |
| | Imperial College London, Institute of Global Health Innovation | Improving Cyber Security in the NHS | Report | 2020 |
| | Medicines and Healthcare products Regulatory Agency (MHRA) | Guidance: Medical device stand-alone software including apps (including IVDMDs), Version 1.06 | Guidance | 2020 |
| | NHS Digital | Protecting medical devices | Guidance | 2019 |
| | Royal Academy of | Cyber safety and resilience: strengthening the digital systems that support the modern | Report | 2018 |

| Area/country | Publisher name | Publication title | Publication type | Year |
|--------------|---|--|------------------------------|------|
| | | economy | | |
| | American National Standards Institute (ANSI), Association for the Advancement of Medical Instrumentation (AAMI) | ANSI/AAMI CI86:2017 Cochlear implant systems: Requirements for safety, functional verification, labeling and reliability reporting | Standard | 2017 |
| | ANSI, National Electrical Manufacturers Association (NEMA) | ANSI/NEMA HN 1-2019 American National Standard – Manufacturer Disclosure Statement for Medical Device Security | Standard | 2019 |
| | 3 | ANSI/UL 2900-1:2017 Standard for Software Cybersecurity for Network-Connectable Products, Part 1: General Requirements | Standard | 2017 |
| | ANSI, Underwriters Laboratories (UL) | ANSI/UL 2900-2-1:2017 Software Cybersecurity for Network-Connectable Products, Part 2-1: Particular Requirements for Network Connectable Components of Healthcare and Wellness Systems | Standard | 2017 |
| | | AAMI TIR57:2016 Principles for medical device security – Risk management | Technical information report | 2016 |
| | AAMI | AAMI TIR97:2019 Principles for medical device security – Postmarket risk management for device manufacturers | Technical information report | 2019 |
| | Carnegie Mellon University | CMU/SEI-2017-SR-022 The CERT® Guide to Coordinated Vulnerability Disclosure | Guidance | 2017 |
| | Department of Health and Human Services (DHHS) Office for Civil Rights | HIPAA Security Rule Crosswalk to NIST Cybersecurity Framework | Crosswalk | 2016 |
| USA | Food and Drug Administration (FDA) Cont Man: Devi Cybe Cont Desi; Subri Inter Medi | Content of Premarket Submissions for Management of Cybersecurity in Medical Devices ^a | Guidance | 2018 |
| | | Content of Premarket Submissions for Management of Cybersecurity in Medical Devices | Guidance | 2014 |
| | | Cybersecurity for Networked Medical Devices Containing Off-the-Shelf (OTS) Software | Guidance | 2005 |
| | | Design Considerations and Pre-market Submission Recommendations for Interoperable Medical Devices | Guidance | 2017 |
| | | Medical Device Safety Action Plan: Protecting Patients, Promoting Public Health | Action plan | 2018 |
| | | Multiple Function Device Products: Policy and Considerations | Guidance | 2020 |
| | | Postmarket Management of Cybersecurity in Medical Devices | Guidance | 2016 |
| | | Radio Frequency Wireless Technology in Medical Devices | Guidance | 2013 |
| | Healthcare and Public Health Sector Coordinating Council (HSCC) | MEDICAL DEVICE AND HEALTH IT JOINT SECURITY PLAN | Joint security plan | 2019 |
| | Health Care Industry Cybersecurity (HCIC) Task Force | REPORT ON IMPROVING CYBERSECURITY IN THE HEALTH CARE INDUSTRY | Report | 2017 |
| | Healthcare Supply Chain Association | Medical Device and Service Cybersecurity: Key Considerations for Manufacturers & Healthcare Providers | Best practices | 2018 |
| | (HSCA) | Recommendations for Medical Device Cybersecurity Terms and Conditions | Recommendation document | 2018 |
| | Health-ISAC Inc. | Medical Device Security Part 1: Landscape of Global Regulatory Guidance | White paper | 2020 |

| Area/country | Publisher name | Publication title | Publication type | Year |
|--------------|--|--|--------------------|------|
| | HS Design, Inc. | Cybersecurity in Medical Devices through Full Systems Design Strategies | Best practices | 2015 |
| | Medical Device Innovation Consortium (MDIC) | Medical Device Cybersecurity Report: Advancing Coordinated Vulnerability Disclosure | Report | 2018 |
| | | Framework for Improving Critical Infrastructure Cybersecurity, Version 1.1 | Framework | 2018 |
| | National Institute of | SP 800-30 Guide for Conducting Risk Assessments, Revision 1 | Guidance | 2012 |
| | | SP 800-37 Risk Management Framework for Information Systems and Organizations: A System Life Cycle Approach for Security and Privacy, Revision 2 | Framework | 2018 |
| | Standards and Technology (NIST) | SP 800-66 An Introductory Resource Guide for Implementing the Health Insurance Portability and Accountability Act (HIPAA) Security Rule, Revision 1 | Guidance | 2008 |
| | | SP 800-95 Guide to Secure Web Services | Guidance | 2007 |
| | | SP 800-121 Guide to Bluetooth Security, Revision 2 | Guidance | 2017 |
| | | SP 800-144 Guidelines on Security and Privacy in Public Cloud Computing | Guidance | 201 |
| | NIST, National Cybersecurity Center | SP 1800-1 Securing Electronic Health Records on Mobile Devices | Guidance | 2018 |
| | of Excellence (NCCoE) | SP 1800-8 Securing Wireless Infusion Pumps in Healthcare Delivery Organizations | Guidance | 2018 |
| | Senator Hannah-Beth Jackson | SB-327 Information privacy: connected devices | Senate bill | 201 |
| | Senator Richard Blumenthal | Medical Device Cybersecurity Act of 2017 | Congressional bill | 201′ |
| | The MITRE Corporation | Medical Device Cybersecurity: Regional Incident Preparedness and Response Playbook, Version 1.0 | Playbook | 2018 |
| | Corporation | Rubric for Applying CVSS to Medical Devices, Version 0.12.04 | Playbook | 2019 |
| | The Office of the National Coordinator for Health Information Technology (ONC) | Guide to Privacy and Security of Electronic Health Information, Version 2.0 | Guidance | 201: |
| | United States Government Accountability Office (GAO) | GAO-12-816 MEDICAL DEVICES: FDA Should Expand Its Consideration of Information Security for Certain Types of Devices | Report | 2012 |
| | | Health Information Technology for Economic and Clinical Health (HITECH) Act | Law | 200 |
| | | Health Insurance Portability and Accountability Act of 1996 ("HIPAA") | Law | 199 |
| | | Health Industry Cybersecurity Practices: Managing Threats and Protecting Patients | Best practices | 201 |
| | U.S. Department of | Standards for Privacy of Individually Identifiable Health Information ("Privacy Rule") | Rule | 200 |
| | Health and Human Services (HHS) | Health Insurance Reform: Security Standards ("Security Rule") | Rule | 200 |
| | | Technical Volume 1: Cybersecurity Practices for Small Health Care Organizations | Best practices | 201 |
| | | Technical Volume 2: Cybersecurity Practices for Medium and Large Health Care Organizations | Best practices | 201 |
| | | Health Industry Cybersecurity Practices: Managing Threats and Protecting Patients, Resources and Templates | Template | 2018 |
| | U.S. Department of | Attack Surface: Healthcare and Public Health | Bulletin | 2012 |

| Area/country | Publisher name | Publication title | Publication type | Year |
|--------------|---|--------------------------------------|---------------------------|------|
| | Homeland Security, National Cybersecurity and Communications Integration Center | Sector | | |
| | U.S. Department of Veterans Affairs (VA) | Medical Device Security, Version 1.0 | Enterprise design pattern | 2017 |

a. Draft

b. Under development

Since 2015, there was a significant increase in the number of released professional cybersecurity publications listed in Table 1. As shown in Figure 1, a total of 117 professional cybersecurity publications were issued between 2015 and 2020 (80.7%), another 22 publications were published during 2008-2014 (15.2%), while only six publications were released during 1996-2007 (4.1%). Three publications were published as a draft version and eight publications are under development and have not been published yet.

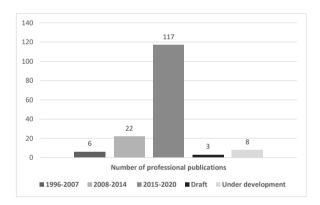


Figure 1. Professional cybersecurity publications by publication timeline

All publications listed in Table 1 were reviewed and classified into 31 different types according to their content. Table 2 lists publication types and shows the number of times they occur in Table 1.

Table 2. Publication types by frequency

| Frequency | Publication type |
|-----------|--|
| 1 | Directive, technical guidance, technical reference, information report, workshop report, enterprise design pattern, crosswalk, recommendation document, consumer information, notification, statement, bulletin, joint security plan, action plan, checklist, template |
| 2 | Bill (i.e., proposed legislation), rule, technical information report, trend report, playbook |
| 3 | Law, framework |
| 5 | Regulation |
| 6 | Report, best practices |
| 8 | Executive brief |
| 10 | White paper, technical report |
| 38 | Standard |
| 41 | Guidance |

4 Discussion and Conclusions

This paper has shown that medical device manufacturers operating in global context must tackle a high number of professional cybersecurity publications and different publication types. Since the first FDA's guidance document outlining the agency's cybersecurity expectations from a premarket perspective was published in 2014, many international regulators introduced their own guidance documents.

Due to the increasing number of regulations and regulatory compliance requirements that are sometimes listed within the guidance documents, implementing cybersecurity is very challenging for medical device industry practitioners and other stakeholders. Medical device companies must identify applicable cybersecurity regulations in countries where they plan to market their products and find an effective solution how to comply with applicable cybersecurity regulations and to maintain compliance.

This paper may assist different groups of professionals, researchers, regulators, and other subject matter experts in identifying applicable cybersecurity regulations, standards, and industry best practices for medical devices. Introducing an international standard that is recognised by most international regulators may help to address the challenges from a regulatory point of view.

The main weakness of this paper was that no systematic literature review could be performed due to the nature of professional cybersecurity publications. Only a relatively small number of such publications can be found in academic databases and search engines that are used for finding and accessing scientific papers.

Due to the scope of conducted narrative literature review, only English and German publications were included. Future work should seek to broaden this further. It would be interesting to develop a centralized database containing a catalogue of applicable professional publications related to medical device cybersecurity. Such database should be

extensible with new entries and contain metadata and keywords for easier search. Further research might explore relevant professional publications related to data privacy protection within the medical sector.

Acknowledgments

The author would like to thank the anonymous reviewers for their valuable comments and suggestions that significantly improved this paper.

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