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Application of risk management for IT-networks incorporating medical devices – Part 1: Roles, responsibilities and activities

Application de la gestion des risques aux réseaux des technologies de l'information contenant des dispositifs médicaux – Partie 1: Fonctions, responsabilités et activités





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INTERNATIONAL ELECTROTECHNICAL COMMISSION

COMMISSION **ELECTROTECHNIQUE INTERNATIONALE**

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INTERNATIONAL ELECTROTECHNICAL COMMISSION

APPLICATION OF RISK MANAGEMENT FOR IT-NETWORKS INCORPORATING MEDICAL DEVICES –

Part 1: Roles, responsibilities and activities

FOREWORD

- 1) The International Electrotechnical Commission (IEC) is a worldwide organization for standardization comprising all national electrotechnical committees (IEC National Committees). The object of IEC is to promote international co-operation on all questions concerning standardization in the electrical and electronic fields. To this end and in addition to other activities, IEC publishes International Standards, Technical Specifications, Technical Reports, Publicly Available Specifications (PAS) and Guides (hereafter referred to as "IEC Publication(s)"). Their preparation is entrusted to technical committees; any IEC National Committee interested in the subject dealt with may participate in this preparatory work. International, governmental and non-governmental organizations liaising with the IEC also participate in this preparation. IEC collaborates closely with the International Organization for Standardization (ISO) in accordance with conditions determined by agreement between the two organizations.
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International Standard IEC 80001-1 has been prepared by a joint working group of subcommittee 62A: Common aspects of electrical equipment used in medical practice, of IEC technical committee 62: Electrical equipment in medical practice and ISO technical committee 215: Health informatics.

It is published as a double logo standard.

The text of this standard is based on the following documents:

FDIS	Report on voting
62A/703/FDIS	62A/718/RVD

Full information on the voting for the approval of this standard can be found in the report on voting indicated in the above table. In ISO, the standard has been approved by 17 P-members out of 18 having cast a vote.

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

Terms defined in Clause 2 of this standard are printed in SMALL CAPITALS.

For the purposes of this standard:

- "shall" means that compliance with a requirement is mandatory for compliance with this standard;
- "should" means that compliance with a requirement is recommended but is not mandatory for compliance with this standard;
- "may" is used to describe a permissible way to achieve compliance with a requirement;
 and
- "establish" means to define, document, and implement.

A list of all parts of the IEC 80001 series, published under the general title *Application of risk management for IT-networks incorporating medical devices*, can be found on the IEC website.

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

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

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INTRODUCTION

An increasing number of MEDICAL DEVICEs are designed to exchange information electronically with other equipment in the user environment, including other MEDICAL DEVICES. Such information is frequently exchanged through an information technology network (IT-NETWORK) that also transfers data of a more general nature.

At the same time, IT-NETWORKS are becoming increasingly vital to the clinical environment and are now required to carry increasingly diverse traffic, ranging from life-critical patient data requiring immediate delivery and response, to general corporate operations data and to email containing potential malicious content (e.g. viruses).

For many jurisdictions, design and production of MEDICAL DEVICES is subject to regulation, and to standards recognized by the regulators. Traditionally, regulators direct their attention to MEDICAL DEVICE manufacturers, by requiring design features and by requiring a documented PROCESS for design and manufacturing. MEDICAL DEVICES cannot be placed on the market in these jurisdictions without evidence that those requirements have been met.

The use of the MEDICAL DEVICES by clinical staff is also subject to regulation. Members of clinical staff have to be appropriately trained and qualified, and are increasingly subject to defined PROCESSES designed to protect patients from unacceptable RISK.

In contrast, the incorporation of MEDICAL DEVICES into IT-NETWORKS in the clinical environment is a less regulated area. IEC 60601-1:2005 [1]¹⁾ requires MEDICAL DEVICE manufacturers to include some information in ACCOMPANYING DOCUMENTS if the MEDICAL DEVICE is intended to be connected to an IT-NETWORK. Standards are also in place covering common information technology activities including planning, design and maintenance of IT-NETWORKS, for instance ISO 20000-1:2005 [9]. However, until the publication of this standard, no standard addressed how MEDICAL DEVICES can be connected to IT-NETWORKS, including general-purpose IT-NETWORKS, to achieve INTEROPERABILITY without compromising the organization and delivery of health care in terms of SAFETY, EFFECTIVENESS, and DATA AND SYSTEM SECURITY.

There remain a number of potential problems associated with the incorporation of MEDICAL DEVICES into IT-NETWORKS, including:

- lack of consideration for RISK from use of IT-NETWORKS during evaluation of clinical RISK;
- lack of support from manufacturers of MEDICAL DEVICES for the incorporation of their products into IT-NETWORKS, (e.g. the unavailability or inadequacy of information provided by the manufacturer to the OPERATOR of the IT-NETWORK):
- incorrect operation or degraded performance (e.g. incompatibility or improper configuration) resulting from combining MEDICAL DEVICES and other equipment on the same IT-NETWORK:
- incorrect operation resulting from combining MEDICAL DEVICE SOFTWARE and other software applications (e.g. open email systems or computer games) in the same IT-NETWORK;
- lack of security controls on many MEDICAL DEVICES; and
- the conflict between the need for strict change control of MEDICAL DEVICES and the need for rapid response to the threat of cyberattack.

When these problems manifest themselves, unintended consequences frequently follow-

This standard is addressed to RESPONSIBLE ORGANIZATIONS, to manufacturers of MEDICAL DEVICES, and to providers of other information technology.

¹⁾ Numbers in square brackets refer to the Bibliography.

This standard adopts the following principles as a basis for its normative and informative sections:

- The incorporation or removal of a MEDICAL DEVICE or other components in an IT-NETWORK
 is a task which requires design of the action; this might be out of the control of the
 manufacturer of the MEDICAL DEVICE.
- RISK MANAGEMENT should be used before the incorporation of a MEDICAL DEVICE into an IT-NETWORK takes place, and for any changes during the entire life cycle of the resulting MEDICAL IT-NETWORK, to avoid unacceptable RISKS, including possible RISK to patients, resulting from the incorporation of the MEDICAL DEVICE into the IT-NETWORK. Many things are part of a RISK decision, such as liability, cost, or impact on mission. These should be considered in determining acceptable RISK in addition to the requirements described in this standard.
- Aspects of removal, maintenance, change or modification of equipment, items or components should be addressed adequately in addition to the incorporation of MEDICAL DEVICES.
- The manufacturer of the MEDICAL DEVICE is responsible for RISK MANAGEMENT of the MEDICAL DEVICE during the design, implementation, and manufacturing of the MEDICAL DEVICE. This standard does not cover the RISK MANAGEMENT PROCESS for the MEDICAL DEVICE.
- The manufacturer of a MEDICAL DEVICE intended to be incorporated into an IT-NETWORK might need to provide information about the MEDICAL DEVICE that is necessary to allow the RESPONSIBLE ORGANIZATION to manage RISK according to this standard. This information can include, as part of the ACCOMPANYING DOCUMENTS, instructions specifically addressed to the person who incorporates a MEDICAL DEVICE into an IT-NETWORK.
- Such accompanying documents should convey instructions about how to incorporate the MEDICAL DEVICE into the IT-NETWORK, how the MEDICAL DEVICE transfers information over the IT-NETWORK, and the minimum IT-NETWORK characteristics necessary to enable the INTENDED USE of the MEDICAL DEVICE when it is incorporated into the IT-NETWORK. The ACCOMPANYING DOCUMENTS should warn of possible hazardous situations associated with failure or disruptions of the IT-NETWORK, and the misuse of the IT-NETWORK connection or of the information that is transferred over the IT-NETWORK.
- RESPONSIBILITY AGREEMENTS can establish roles and responsibilities among those engaged
 in the incorporation of a MEDICAL DEVICE into an IT-NETWORK, all aspects of the life cycle of
 the resulting MEDICAL IT-NETWORK and all activities that form part of that life cycle.
- The RESPONSIBLE ORGANIZATION is required to appoint people to certain roles defined in this standard. This standard defines the responsibilities of those roles. The most important of those roles is the MEDICAL IT-NETWORK RISK MANAGER. This role can be assigned to someone within the RESPONSIBLE ORGANIZATION or to an external contractor.
- The MEDICAL IT-NETWORK RISK MANAGER is responsible for ensuring that RISK MANAGEMENT is included during the PROCESSES of:
 - planning and design of new incorporations of MEDICAL DEVICES or changes to such incorporations;
 - putting the MEDICAL IT-NETWORK into use and the consequent use of the MEDICAL IT-NETWORK; and
 - CHANGE-RELEASE MANAGEMENT and change management of the IT-NETWORK during the IT-NETWORK's entire life cycle.
- RISK MANAGEMENT should be applied to address the following KEY PROPERTIES appropriate for the IT-NETWORK incorporating a MEDICAL DEVICE:
 - SAFETY (freedom from unacceptable RISK of physical injury or damage to the health of people or damage to property or the environment);
- EFFECTIVENESS (ability to produce the intended result for the patient and the RESPONSIBLE ORGANIZATION); and

DATA AND SYSTEM SECURITY (an operational state of a MEDICAL IT-NETWORK in which

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APPLICATION OF RISK MANAGEMENT FOR IT-NETWORKS INCORPORATING MEDICAL DEVICES –

Part 1: Roles, responsibilities and activities

1 Scope

Recognizing that MEDICAL DEVICES are incorporated into IT-NETWORKS to achieve desirable benefits (for example, INTEROPERABILITY), this international standard defines the roles, responsibilities and activities that are necessary for RISK MANAGEMENT of IT-NETWORKS incorporating MEDICAL DEVICES to address SAFETY, EFFECTIVENESS and DATA AND SYSTEM SECURITY (the KEY PROPERTIES). This international standard does not specify acceptable RISK levels.

NOTE 1 The RISK MANAGEMENT activities described in this standard are derived from those in ISO 14971 [4]. The relationship between ISO 14971 and this standard is described in Annex A.

This standard applies after a MEDICAL DEVICE has been acquired by a RESPONSIBLE ORGANIZATION and is a candidate for incorporation into an IT-NETWORK.

NOTE 2 This standard does not cover pre-market RISK MANAGEMENT.

This standard applies throughout the life cycle of IT-NETWORKS incorporating MEDICAL DEVICES.

NOTE 3 The life cycle management activities described in this standard are very similar to those of ISO/IEC 20000-2 [10]. The relationship between ISO/IEC 20000-2 and this standard is described in Annex D.

This standard applies where there is no single MEDICAL DEVICE manufacturer assuming responsibility for addressing the KEY PROPERTIES of the IT-NETWORK incorporating a MEDICAL DEVICE.

NOTE 4 If a single manufacturer specifies a complete MEDICAL DEVICE that includes a network, the installation or assembly of the MEDICAL DEVICE according to the manufacturer's ACCOMPANYING DOCUMENTS is not subject to the provisions of this standard regardless of who installs or assembles the MEDICAL DEVICE.

NOTE 5 If a single manufacturer specifies a complete MEDICAL DEVICE that includes a network, additions to that MEDICAL DEVICE or modification of the configuration of that MEDICAL DEVICE, other than as specified by the manufacturer, is subject to the provisions of this standard.

This standard applies to RESPONSIBLE ORGANIZATIONS, MEDICAL DEVICE manufacturers and providers of other information technology for the purpose of RISK MANAGEMENT of an IT-NETWORK incorporating MEDICAL DEVICES as specified by the RESPONSIBLE ORGANIZATION.

This standard does not apply to personal use applications where the patient, OPERATOR and RESPONSIBLE ORGANIZATION are one and the same person.

NOTE 6 In cases where a MEDICAL DEVICE is used at home under the supervision or instruction of the provider, that provider is deemed to be the RESPONSIBLE ORGANIZATION. Personal use where the patient acquires and uses a MEDICAL DEVICE without the supervision or instruction of a provider is out of scope of this standard.

This standard does not address regulatory or legal requirements.

2 Terms and definitions

For the purposes of this document, the following terms and definitions apply: