INTRODUCTION

In-house clinical software development has been around for decades but has become more prominent in recent years. Acknowledging the debate whether or not good non-commercial medical software development management should be considered outside of the scope of medical physics practice,1 there is nonetheless the need for the software being actively developed now to be safe and robust for clinical use. Unfortunately, the industry guidelines and staffing models have not changed significantly to accommodate the increased need for quality software development practices in the clinic. At the time of this publication, clinical software development and evaluation are not included in the Commission on Accreditation of Medical Physics Educational Programs (CAMPEP) Standards for Residency Programs.2 Physics errors have the potential to impact large numbers of patients because of the scope of responsibilities (eg. machine calibration, planning system commissioning) and lack of qualified personnel to review work and catch errors. In-house...
clinical software further amplifies this issue allowing for a complicated task to be automated and scaled throughout a clinical practice potentially causing unintended harm to patients if an error exists in design or implementation.

There has been some guidance published concerning software best practices for medical physicists. More than two decades ago, Rosen outlined comprehensive practices including writing design specifications, testing, documentation, and other coding practices. Many are still very relevant today, but the software development industry has evolved significantly since that work and we believe there is a need for further practical guidelines. Others have more recently summarized principles they have followed including FMEA and “automated QA”. While there have been a few publications on standards for the development of medical device software, there has been very little with specific targeted recommendations for medical physicists. In the following sections, we will outline a risk assessment model that can be used for clinical software development and highlight some mitigation strategies to give direction that is practical and applicable to medical physicists.

1.1 A note concerning spreadsheet software

Many computer applications have the capability for users to modify the behavior of the application or to manipulate data in a user-specified fashion. When used in this way in a clinical setting, these applications present the same risks as custom software created using a formal programming language. An important example for medical physicists is the spreadsheet program Microsoft Excel (Microsoft Corporation, Redmond, WA). Microsoft Excel is ubiquitous and most medical physicists have experience using it. In a survey of in-house software practices, Salomons and Kelly found that 93% of surveyed centers use custom spreadsheets. Clinical physicists who do not consider themselves “programmers” are often comfortable building spreadsheets for clinical use. The familiarity of medical physicists with spreadsheet software can result in complacency about the hazards presented by spreadsheets. Because spreadsheets are so widely used and present unique challenges for quality assurance, risk assessment, and mitigation for spreadsheets will be addressed explicitly along with other in-house developed software.

2 RISK ASSESSMENT

To assess which quality assurance measures are appropriate for the developed software, a risk management approach should be used comparable to failure modes and effect analysis (FMEA). In FMEA, the risk is determined by assessing the frequency of occurrence (O), severity (S), and the probability of the incident going undetected (D) for each identified failure mode. These numbers are multiplied together to obtain a risk priority number (RPN) which is used to quantitatively evaluate the risk of each failure mode in a radiotherapy workflow. Similarly, we recommend that risk should be assessed for each individual software tool developed. Quantitative risk assessment for software can be performed by the following parameters: population (P), intent (I), and complexity (C). Table 1 shows the descriptions of the P, I, and C values.

Population is intended to gauge the scale of the software tool and is a direct measure of the percentage of
the clinic’s population that the tool will impact. This is
analogous to occurrence in TG-100 since it a measure
of frequency. In effect, it measures the potential am-
plification of errors in the system. The lowest rank in
the category is reserved for software tools that impact
a relatively low number of patients, while the highest
level includes software tools that will be shared across
institutions.

Intent refers to the classification of the software and
how it is used in clinical decision making. This is anal-
ogous to the severity in TG-100 because tools that di-
rectly impact clinical decision making pose a larger risk
than those used for efficiency improvements. We strat-
ified classes by their ability to acutely impact patient
outcomes and whether they could override existing
clinical data. A class system similar to how the FDA de-
termines risk for medical devices 11 is shown in Table 2
but has been tailored to software categories expected
to be developed in medical physics.

Risk is also increased as the complexity of the code
increases. According to Leveson, one of the most effec-
tive tools for making software safer is building it to be
intellectually manageable.12 Complexity is a measure of
how difficult it is to find an error by an independent re-
viewer. This is analogous to TG-100 detectability. With
increased complexity, the probability of errors going
undetected significantly increases. We broke down
complexity into three main categories: number of lines
of code per unit/function, the total number of units, and
readability of the code. Readability is a qualitative mea-
sure that includes following some standard practices of
variable naming, method naming, and sufficient com-
ments so that the intent of the methods and variables
can be easily understood. Low complexity improves
the maintainability of the code base and prevents in-
creased risk when the original developer(s) are no lon-
ger a part of the project.

Like RPN, these parameters can be used to
rank each custom software tool by multiplying the
parameters together to get the software risk number
(SRN) where SRN = P*I*C. This number will serve
as a quantitative metric for the posed risk if the code
does not perform as anticipated or if the design is
flawed. After SRN is evaluated, clinics can rank tools
by highest SRN and intent to determine the most
hazardous tools. Tools with the highest SRN and
those used for direct clinical decision making (IIA,
IIB) can be allotted the appropriate resources during
development, commissioning, and routine quality as-
surance. Our intent is not to be prescriptive in what
SRN values require which risk management tools, but
to create a framework for assessing risk. Individual
clinics can evaluate SRN in conjunction with avail-
able resources to prioritize and allot risk manage-
ment endeavors.

### 2.1 Spreadsheet software

For the risk assessment of spreadsheets, the popu-
lation and intent rankings can be assigned as de-
scribed above. For complexity, a separate evaluation
is needed. Table 3 shows the complexity ranking for
spreadsheets. Complexity increases as the number of
cells and the interdependence of calculated cells in-
creases. The highest level of complexity is for spread-
sheets that contain macros regardless of the number
of calculated cells.

#### Table 2: Classification system for the intent of clinical software

| Classification          | Description                                                                 | Examples                                                                 |
|-------------------------|-----------------------------------------------------------------------------|--------------------------------------------------------------------------|
| I A (Minimal risk)      | A codebase that does not have a direct impact on clinical efficiency or clinical outcome (research) | Plan automation in research database; DVH Mining; Post-treatment plan analysis |
| I B (Minimal to moderate risk) | A codebase that could influence clinical efficiency but not directly affect the clinical outcome if code does not perform as anticipated or if the design is flawed (efficiency tools) | DICOM automation; Export tools; Post-treatment Reporting |
| II A (Moderate Risk)    | A codebase which could affect the clinical outcome if code does not perform as anticipated or if the design is flawed but does not write to a clinical database (read clinical tools) | Plan quality check tools; Pre-treatment reporting/instructions |
| II B (Moderate to High Risk) | A codebase which could affect the clinical outcome if code does not perform as anticipated or if the design is flawed and also writes to a clinical database (write clinical tools) | Plan automation components; QA automation components; Pre-treatment data importing tools |

#### Table 3: Tiers of complexity for spreadsheets

| Rank | # Calculated cells | # Sheets with data input | Macros |
|------|--------------------|--------------------------|--------|
| 1–2  | <10                | 1                        | No     |
| 3–5  | <25                | 1                        | No     |
| 6–8  | >25                | 2+                       | No     |
| 9–10 | -                  | -                        | Yes    |
2.2 | Reassessment of risk

It should be noted that risk can change as the project progresses. For example, while a large outcome project would have no immediate clinical impact (categorized as a Class IA initially) and a low population score (Rank 1), its errors could have a long-lasting impact if the data were eventually used for setting clinical objectives. In this case, the code could transition to a population Rank 3 or 4 and intent of II A, as shown in Figure 1, increasing the risk significantly. We recommend regularly assessing the risk of the software throughout the project timeline to ensure that adequate risk mitigation techniques have been employed.

2.3 | Risk and the end-user

We note that this model does not explicitly account for the end-user when classifying detectability and complexity. We acknowledge that the detectability of errors can vary depending on the user and are dependent on both their technical expertise and familiarity with the software content. Complexity levels could also vary as the readability of the program is subjective. When assessing detectability and complexity, it may be prudent to consider the characteristics of the end-users and adjust these parameters accordingly.

3 | RISK MITIGATION

According to Leveson, “complacency is the most important risk factor in a system, and a safety culture must be established that minimizes it.” Within the context of an established safety culture, best practices of software development include a diverse team to develop and evaluate the software. Table 4 includes the roles of responsibilities of team members. Typically, physicists are serving multiple roles on the teams as both developers and users. If feasible, physicists not involved in direct code development should be available for end-user testing and commissioning. We acknowledge that this may not be possible due to staffing at small clinics. Regardless, end-user testing and commissioning should be well documented to distinguish development from quality assurance steps.

3.1 | Software configuration

When possible, editing of configuration parameters should be controlled to eliminate the risk of unintended changes. This is difficult to achieve at run-time because it requires the creation and management of user
roles. If configuration parameters cannot be secured at run-time, developers should strongly consider incor-
porating parameters into the application so that when compiled the parameters are not exposed to end-users. Alternatively, configuration files can be placed in a lo-
cation that users cannot access, or the configuration files can be encrypted and decrypted by the applica-
tion. For spreadsheets, the entire document is like a configuration file and careful consideration should be taken to ensure critical parameters and functions do not change unintendedly. Specific recommendations for spreadsheets are outlined below.

### 3.2 | Source control

One of the most difficult tasks about malleable cus-
tom software is knowing its current state. Has it been modified? Who modified it? Why was it modified? Is the current version tested? Which version is deployed? Software configuration management (SCM) aims to solve these problems by allowing a small database to keep track of every detail of changes over time. The authors believe this is one of the most crucial steps needed to implement a safe and clinical development practice. Modern source control systems, most popu-
larly Git,\textsuperscript{14} allow many other advantages including allowing easy editing on multiple computers by multiple people.

### 3.3 | Code review

When possible, higher risk software should be re-
viewed by an independent party. McIntosh et al. found that “review coverage, participation, and expert-
tise share a significant link with software quality.”\textsuperscript{15} Code review helps enforce good practices of naming, encapsulation, and overall readability which reduces the complexity of code and thereby increasing detect-
ability. The extent and detail of the review are subjec-
tive. At our institution, we review all Class II software (Intent) and ensure the code is readable, logical, and maintainable.

### 3.4 | Testing

Testing software can be a tedious task. Testing is often divided into several categories including function (unit) testing, system testing, volume testing, capacity testing, security testing, performance testing, and many others.\textsuperscript{16} Because the scope of testing can be overwhel-
ming for a clinical medical physicist, we have chosen to describe the minimum testing which should be per-
formed prior to deploying clinical software. We believe the following are achievable and practical techniques that are followed at our institution for Rank 3 and above (Population) and Class IB and above (Intent).

#### 3.4.1 | Unit testing

As highlighted by Levenson,\textsuperscript{17} specification of software and isolation of safety-critical components is para-
mount to safe software practices. One practical way of both specifying the objective and isolating a part of the software from other parts is to design the entire applica-
tion as a collection of smaller units. This allows for the common practice of developers to strengthen a code base with unit testing, or “testing the smallest separate module in the system.”\textsuperscript{18} Unit testing is like component testing (machine QA) for medical physicists, where the entire validation of a medical device is broken into subtests (rotation about isocenter, mechanical motion along each axis, energy validation, etc.). In modern unit testing frameworks, the tests are automated and can be run upon any change to the code. Deciding which units should be tested in this way is subjective, but we recommend at a minimum to design unit tests for the most critical parts of code. Criticality can be assessed using the risk model outlined previously.

#### 3.4.2 | System testing

System testing is the overall testing of a complete sys-
tem, a concept familiar to medical physicists as end-
to-end testing. Leveson states that the “safety of software can only be evaluated in the context of the system within which it operates.”\textsuperscript{12} System tests should be de-
defined early in the development process, including the expected output of each test. System integration test-
ing should not be deferred to the end but should start as soon as possible during development. All system tests should be completed successfully prior to each round of end-user testing.

#### 3.4.3 | End-user testing

In a recent survey on the development of in-house soft-
ware by medical physics,\textsuperscript{8} testing was reported as the area of most concern when developing software for clinical use. In addition to the testing done by devel-
opers, end-user testing, or user acceptance testing is necessary before the clinical release of software tools. End-user testing will be used to test the system for unforeseen use cases that can result in errors. One of the most infamous instances of this in radiotherapy was the Therac-25 software which could trigger catastrophic radiation doses in patients if the therapists pressed the console buttons too quickly.\textsuperscript{19} Before end-user testing, a testing plan should be developed. This plan should
detail to the end-user a list of tests with specifications. Per Rosen tests should be based on risk analysis. End users should document which tests were performed with outcomes to either provide feedback to the development or to document functionality for commissioning reports.

Per Padmini et al., end-user testing should be done early and throughout the development period to prevent project failure. To optimize end-user testing, developers should provide the end-users with documentation and clear instruction on how the software operates. End users cannot expect to test software without an understanding of the functionality of the program. Padmini et al. identified the lack of a proper end-user testing process and lack of knowledge of the testing procedure as common shortcomings in end-user testing. Per Salomons et al., a survey indicated that only 7% of in-house software tools had written guidelines for the use of in-house software. This shows an area of need for great improvement to follow best practices in software development.

### 3.5 | Clinical commissioning

Before clinical release, in-house software should undergo a formal commissioning process to assess the software for clinical release. This is independent of software development testing but may include an overlap of tests performed during end-user testing. Tests performed should be clearly documented and include test plans or anonymized patients used for evaluation. Outcomes of commissioning should include a formal commissioning report, use policy, and procedures for users.

#### 3.5.1 | Spreadsheets

One resource for spreadsheet development is The European Spreadsheet Risks Interest Group (EuSpRig) which maintains a list of references for best practices and a collection of spreadsheet horror stories. While many of the practices EuSpRig focus on the financial industry, concepts such as documentation and team review are generalizable to any field. Because spreadsheets are rarely built by professional developers and spreadsheet software was not designed for life safety applications, industry-standard tools for testing and deployment, specifically unit testing tools, are not readily available and well known although commercial software for version control and unit testing of Excel is available. Many of the practices described here can be readily applied including code classification, version control, integration testing, and clinical commissioning. In addition to these practices, several spreadsheet-specific strategies should be applied. First, cells that do calculations or that contain fixed data should be protected. In our experience, clinical users will not hesitate to unlock cells to fix a perceived problem and so protecting cells should be augmented with a password requirement to unlock cells. Second, spreadsheets should be developed as templates that prevent editing by making the files read-only. Completed spreadsheets should not be copied and pasted to be used with new data. In addition to the risk of using old data, copying spreadsheets, rather than using a template, can result in multiple versions of a spreadsheet being in use. If spreadsheets are not appropriately protected, copying files can result in user-introduced errors being distributed.

### 4 | CONCLUSION

Custom clinical software development is increasing in medical physics and there is little published guidance to help physicists in both the assessment of risk and techniques to reduce risk. We feel many of the methods mentioned are beyond the typical expertise of a physicist and needed to be elucidated. We have outlined a novel strategy for categorizing clinical software to determine the prioritization of effort to afford to create a safe software development practice. These guidelines can be applied to a variety of custom clinical software from stand-alone programs, spreadsheets, and application programming interface (API) scripts for treatment planning systems and other commercial software that allows APIs. Additionally, we have shared some of our institution’s thresholds and techniques which we believe to be practical and achievable at most facilities.

### CONFLICT OF INTEREST

The authors have no relevant conflicts of interest to disclose.

### AUTHOR CONTRIBUTION

Rex A. Cardan made substantial contributions to the conception and design of the work; the acquisition, analysis, and interpretation of data for the work; drafting the work and revising it critically for important intellectual content; gave final approval of the version to be published; and agrees to be accountable for all aspects of the work in ensuring that questions related to the accuracy or integrity of any part of the work are appropriately investigated and resolved. Elizabeth L. Covington made substantial contributions to the conception and design of the work; the acquisition, analysis, and interpretation of data for the work; drafting the work and revising it critically for important intellectual content; gave final approval of the version to be published; and agrees to be accountable for all aspects of
the work in ensuring that questions related to the accuracy or integrity of any part of the work are appropriately investigated and resolved. Richard Popple made substantial contributions to the conception and design of the work; the acquisition, analysis, and interpretation of data for the work; drafting the work and revising it critically for important intellectual content; gave final approval of the version to be published; and agrees to be accountable for all aspects of the work in ensuring that questions related to the accuracy or integrity of any part of the work are appropriately investigated and resolved.

ORCID
Rex A. Cardan © https://orcid.org/0000-0001-9483-1398
Elizabeth L. Covington © https://orcid.org/0000-0002-2018-4316
Richard A. Popple © https://orcid.org/0000-0003-1252-738X

REFERENCES
1. Kelly D, Wasssyng A. 7.6. The most suitable person to establish quality assurance guidelines for the generation and use of non-commercial clinical software is a medical physicist. Controversies in Medical Physics: a Compendium of Point/Counterpoint Debates Volume 3. 2017:295.
2. CAMPEP. Standards for Accreditation of Residency Educational Programs in Medical Physics. 2019.
3. Rosen II. Writing software for the clinic. Med Phys. 1998;25(3):301-309.
4. Kisling K, Johnson JL, Simonds H, et al. A risk assessment of automated treatment planning and recommendations for clinical deployment. Med Phys. 2019;46(4):2567-2574.
5. O’Connell D, Thomas DH, Lewis JH, et al. Safety-oriented design of in-house software for new techniques: a case study using a model-based 4 DCT protocol. Med Phys. 2019;46(4):1523-1532.
6. Yang D, Moore KL. Automated radiotherapy treatment plan integrity verification. Med Phys. 2012;39(3):1542-1551.
7. Aami A. Guidance on the use of agile practices in the development of medical device software. Ass Adv Med Instr. 2012;21:22-78.
8. Salomons GJ, Kelly D. A survey of Canadian medical physicists: software quality assurance of in-house software. J Appl Clin Med Phys. 2015;16(1):336-348.
9. Batbayar K, Takács M, Kozlovskyi M. Medical device software risk assessment using FMEA and fuzzy linguistic approach: Case study. Paper presented at: 2016 IEEE 11th International Symposium on Applied Computational Intelligence and Informatics (SACI); 2016.
10. Huq MS, Fraass BA, Dunscombe PB, et al. The report of Task Group 100 of the AAPM: application of risk analysis methods to radiation therapy quality management. Med Phys. 2016;43(7):4209-4262.
11. US Food and Drug Administration. CFR-code of federal regulations title 21. In: 2017.
12. Leveson NG. Safeware: system safety and computers. Addison-Wesley, Boston; 1995.
13. Zietman A, Palta J, Steinberg M, Blumberg A, Burns R, Cagle S. Safety is no accident: a framework for quality radiation oncology and care. Am Soc Radiat Oncol. 2012.
14. Loeliger J, McCullough M. Version Control with Git: Powerful tools and techniques for collaborative software development. O’Reilly Media, Inc., Sebastopol. 2012.
15. McIntosh S, Kamei Y, Adams B, Hassan AE. An empirical study of the impact of modern code review practices on software quality. Emp Softw Eng. 2016;21(5):2146-2189.
16. Myers GJ, Badgett T, Thomas TM, Sandler C. The art of software testing. Vol 2: Wiley Online Library. 2004.
17. Leveson NG. Software safety: why, what, and how. ACM Comput Surv (CSUR). 1986;18(2):125-163.
18. Runeson P. A survey of unit testing practices. IEEE Softw. 2006;23(4):22-29.
19. Leveson NG, Turner CS. An investigation of the Therac-25 accidents. Computer. 1993;26(7):18-41.
20. Padmini KJ, Perera I, Bandara HD. Applying agile practices to avoid chaos in User Acceptance Testing: A case study. Paper presented at: 2016 Moratuwa Engineering Research Conference (MERCon); 2016.
21. Group ESRI. European Spreadsheet Risk Interest Group. 2021. http://www.eusprig.org/

SUPPORTING INFORMATION
Additional supporting information may be found online in the Supporting Information section.

How to cite this article: Cardan RA, Covington EL, Popple RA. Code Wisely: Risk assessment and mitigation for custom clinical software. J Appl Clin Med Phys. 2021;22:273–279. https://doi.org/10.1002/acm2.13348