

SPECIAL 510(k): Device Modification

To: THE FILE

RE: DOCUMENT NUMBER

K 042416

This 510(k) submission contains information/data on modifications made to the SUBMITTER'S own Class II, Class III or Class I devices requiring 510(k). The following items are present and acceptable:

1. The name and 510(k) number of the SUBMITTER'S previously cleared device. *AtheNA Multi-Lyte® ANA Test System (K021103)*.
2. Submitter's statement that the **INDICATION/INTENDED USE** of the modified device as described in its labeling **HAS NOT CHANGED** along with the proposed labeling which includes instructions for use, package labeling, and, if available, advertisements or promotional materials.
3. A description of the device **MODIFICATION(S)**, including clearly labeled diagrams, engineering drawings, photographs, user's and/or service manuals in sufficient detail to demonstrate that the **FUNDAMENTAL SCIENTIFIC TECHNOLOGY** of the modified device **has not changed**.
The changes were 1) *dilution of patient sample changed from 1:200 to 1:21 and 2) Addition of a wash step after sample incubation to remove unbound patient antibody before addition of conjugate.*
4. **Comparison Information** (similarities and differences) to applicant's legally marketed predicate device including *labeling, intended use, indication for use, methodology, kit component specification, packaging and analytical performance*.
5. A **Design Control Activities Summary** which includes:
 - a) Identification of Risk Analysis method(s) used to assess the impact of the modification on the device and its components, and the results of the analysis – *EN 1441 guidelines (see additional information submitted in S001)*
 - b) Based on the Risk Analysis, an identification of the verification and/or validation activities required, including methods or tests used and acceptance criteria to be applied (*Method comparison of modified assay and original assay. Acceptance criteria included relative agreement between the two assays should be greater or equal to 90% and the read time for the modified assay is comparable to the original assay*)
 - c) A declaration of conformity with design controls (*see additional information submitted in S001*). The declaration of conformity should include:
 - i) A statement signed by the individual responsible, that, as required by the risk analysis, all verification and validation activities were performed by the designated individual(s) and the results demonstrated that the predetermined acceptance criteria were met, and
 - ii) A statement signed by the individual responsible, that the manufacturing facility is in conformance with design control procedure requirements as specified in 21 CFR 820.30 and the records are available for review.
6. A **Truthful and Accurate Statement, a 510(k) Statement** and the **Indications for Use Enclosure**.

The labeling for this modified subject device has been reviewed to verify that the indication/intended use for the device is unaffected by the modification. In addition, the submitter's description of the particular modification(s) and the comparative information between the modified and unmodified devices demonstrate that the fundamental scientific technology has not changed. The submitter has provided the design control information as specified in The New 510(k) Paradigm and on this basis, I recommend the device be determined substantially equivalent to the previously cleared device.