510(k) Summary of Safety and Effectiveness

This summary of 510(k) safety and effectiveness information is being submitted in accordance with the requirements of SMDA 1990 and 21 CFR 807.92.

Preparation Date
January 30, 2014

Introduction
According to the requirements of 21 CFR 807.92, the following information provides sufficient detail to understand the basis for a determination of substantial equivalence.

Submitter name, Address, and Contact

Lin-Zhi International, Inc.
670 Almanor Avenue
Sunnyvale, CA 94085
Phone: (408) 732-3856
Fax: (408) 732-3849
e-mail: bclin@lin-zhi.com

Contact: Bernice Lin, Ph.D.
VP Operations

Device Name and Classification

Classification Name: Enzyme Immunoassay, Oral Fluid Amphetamine
Class II, DKZ (91 Toxicology),
21 CFR 862.3100

Drug Specific Calibrators,
Class II, DLJ (91 Toxicology),
21 CFR 862.3200

Drug Specific Controls,
Class I, LAS (91 Toxicology),
21 CFR 862.3280

Common Name: Homogeneous Oral Fluid Amphetamine Enzyme Immunoassay
Proprietary Name: LZI Oral Fluid Amphetamine Enzyme Immunoassay,
LZI Oral Fluid Amphetamine Calibrators
LZI Oral Fluid Amphetamine Controls
Legally Marketed Predicate Device(s)

The LZI Oral Fluid Amphetamine Enzyme Immunoassay (k131653) is substantially equivalent to the Lin-Zhi International, Inc. Oral Fluid Amphetamine Enzyme Immunoassay, Calibrators and Controls for Hitachi 717 Systems (k063024) manufactured by Lin-Zhi International, Inc. The LZI Oral Fluid Amphetamine Enzyme Immunoassay is identical or similar to its predicate in terms of intended use, method principle, device components, and clinical performance.

Device Description

The LZI Oral Fluid Amphetamine assay is a homogeneous enzyme immunoassay with ready-to-use liquid reagent. The assay is based on competition between drug in the sample and drug labeled with the enzyme glucose-6-phosphate dehydrogenase (G6PDH) for a fixed amount of antibody in the reagent. Enzyme activity decreases upon binding to the antibody, and the drug concentration in the sample is measured in terms of enzyme activity. In the absence of drug in the sample, amphetamine-labeled G6PDH conjugate is bound to antibody, and the enzyme activity is inhibited. On the other hand, when free drug is present in the sample, antibody would bind to free drug, the unbound amphetamine-labeled G6PDH then exhibits its maximal enzyme activity. Active enzyme converts nicotinamide adenine dinucleotide (NAD) to NADH, resulting in an absorbance change that can be measured spectrophotometrically at 340 nm.

The LZI Oral Fluid Amphetamine Enzyme Immunoassay is a kit comprised of two reagents, an R₁ and R₂ which are bottled separately but sold together within the kit.

The R₁ solution contains mouse monoclonal anti-amphetamine antibody, glucose-6-phosphate (G6P) nicotinamide adenine dinucleotide (NAD), stabilizers, and sodium azide (0.09%) as a preservative. The R₂ solution contains glucose-6-phosphate dehydrogenase (G6PDH) labeled with amphetamine in buffer with sodium azide (0.09%) as preservative.

The LZI Oral Fluid Amphetamine Enzyme Immunoassay calibrators and controls designated for use at the 50 ng/mL cutoffs contain 0, 25, 37.5, 50, 62.5, 100, and 140 ng/mL of d-amphetamine in human oral fluid with sodium azide (0.09%) as preservative. These five calibrators and two controls are sold as individual bottles.

The LZI Oral Fluid Collector is a 50 mL polypropylene collection tube. It is a non-sterile centrifuge tube with a screw-on cap and printed graduations (United Lab Plastics, Catalog#UP2262).
**Intended Use**

The LZI Oral Fluid Amphetamine Enzyme Immunoassay is intended for the qualitative and semi-quantitative determination of d-amphetamine in neat human oral fluid, collected into the LZI Oral Fluid Collector, at the cutoff value 50 ng/mL. The assay is designed for prescription use with a number of automated clinical chemistry analyzers.

The semi-quantitative mode is for purposes of (1) enabling laboratories to determine an appropriate dilution of the specimen for confirmation by a confirmatory method such as GCMS and LCMS or (2) permitting laboratories to establish quality control procedures.

The LZI Oral Fluid Amphetamine Calibrators are for use as calibrators in the qualitative and semi-quantitative calibration of the LZI Oral Fluid Amphetamine Enzyme Immunoassay at the cutoff value 50 ng/mL.

The LZI Oral Fluid Amphetamine Controls are for use as assayed quality control materials to monitor the precision of the LZI Oral Fluid Amphetamine Enzyme Immunoassay at the cutoff value of 50 ng/mL.

The assay provides only a preliminary analytical result. A more specific alternative chemical method must be used in order to obtain a confirmed analytical result. Gas, or liquid chromatography/mass spectrometry (GC/MS or LC/MS) is the preferred confirmatory method. Clinical consideration and professional judgment should be exercised with any drug of abuse test result, particularly when the preliminary test result is positive.
Comparison to Predicate Device

The LZI Oral Fluid Amphetamine Enzyme Immunoassay (k131653) is substantially equivalent to the Lin-Zhi International, Inc. Oral Fluid Amphetamine Enzyme Immunoassay, Calibrators and Controls for Hitachi 717 Systems cleared by the FDA under the premarket notification k063024 for its stated intended use.

The following table compares LZI's Oral Fluid Amphetamine Enzyme Immunoassay (k131653) with the predicate device.

<table>
<thead>
<tr>
<th>Device Characteristics</th>
<th>Subject Device (k131653)</th>
<th>Predicate Device (k063024)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Intended Use</strong></td>
<td>The LZI Oral Fluid Amphetamine Enzyme Immunoassay, Calibrators and Controls</td>
<td>The Amphetamine-Specific Enzyme Immunoassay for Drugs of Abuse in Oral Fluid is a homogeneous enzyme immunoassay system to detect amphetamine in human saliva with a cutoff of 45 ng/mL when testing oral fluid specimen collected with Salivette collector (manufactured by Sarstedt) and diluted with 1 mL of buffer. The calibrators and controls of the analyte (d-amphetamine) are prepared with oral fluid buffer so that it can be used to verify and validate the assay. The assay is intended for use in the qualitative determination for amphetamine. The assay is designed for professional use with a number of automated clinical chemistry analyzers.</td>
</tr>
<tr>
<td><strong>Calibrator Levels</strong></td>
<td>5 Levels (0, 25, 50, 100, 140 ng/mL)</td>
<td>5 Levels (0, 15, 30, 45, 90 ng/mL)</td>
</tr>
<tr>
<td><strong>Control Levels</strong></td>
<td>2 Levels (37.5 ng/mL, 62.5 ng/mL)</td>
<td>2 Levels (30 ng/mL, 90 ng/mL)</td>
</tr>
<tr>
<td><strong>Storage</strong></td>
<td>2-8 °C until expiration date</td>
<td>2-8 °C until expiration date</td>
</tr>
</tbody>
</table>
Performance Characteristics Summary:
Hitachi 717 Analyzer

Semi-Quantitative Positive/Negative Results:

<table>
<thead>
<tr>
<th>Sample Concentration</th>
<th>% of Cutoff</th>
<th>Number of Determination</th>
<th>Immunoassay Result</th>
<th>Number of Determination</th>
<th>Immunoassay Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 ng/mL</td>
<td>-100.0%</td>
<td>22</td>
<td>22 Negative</td>
<td>88</td>
<td>88 Negative</td>
</tr>
<tr>
<td>12.5 ng/mL</td>
<td>-75.0%</td>
<td>22</td>
<td>22 Negative</td>
<td>88</td>
<td>88 Negative</td>
</tr>
<tr>
<td>25 ng/mL</td>
<td>-50.0%</td>
<td>22</td>
<td>22 Negative</td>
<td>88</td>
<td>88 Negative</td>
</tr>
<tr>
<td>37.5 ng/mL</td>
<td>-25.0%</td>
<td>22</td>
<td>22 Negative</td>
<td>88</td>
<td>88 Negative</td>
</tr>
<tr>
<td>50 ng/mL</td>
<td>100.0%</td>
<td>22</td>
<td>11 Pos/11 Neg</td>
<td>88</td>
<td>36 Pos/52 Neg</td>
</tr>
<tr>
<td>62.5 ng/mL</td>
<td>+25.0%</td>
<td>22</td>
<td>22 Positive</td>
<td>88</td>
<td>88 Positive</td>
</tr>
<tr>
<td>75 ng/mL</td>
<td>+50.0%</td>
<td>22</td>
<td>22 Positive</td>
<td>88</td>
<td>88 Positive</td>
</tr>
<tr>
<td>87.5 ng/mL</td>
<td>+75.0%</td>
<td>22</td>
<td>22 Positive</td>
<td>88</td>
<td>88 Positive</td>
</tr>
<tr>
<td>100 ng/mL</td>
<td>+100.0%</td>
<td>22</td>
<td>22 Positive</td>
<td>88</td>
<td>88 Positive</td>
</tr>
</tbody>
</table>

Qualitative Positive/Negative Results:

<table>
<thead>
<tr>
<th>Sample Concentration</th>
<th>% of Cutoff</th>
<th>Number of Determination</th>
<th>Immunoassay Result</th>
<th>Number of Determination</th>
<th>Immunoassay Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 ng/mL</td>
<td>-100.0%</td>
<td>22</td>
<td>22 Negative</td>
<td>88</td>
<td>88 Negative</td>
</tr>
<tr>
<td>12.5 ng/mL</td>
<td>-75.0%</td>
<td>22</td>
<td>22 Negative</td>
<td>88</td>
<td>88 Negative</td>
</tr>
<tr>
<td>25 ng/mL</td>
<td>-50.0%</td>
<td>22</td>
<td>22 Negative</td>
<td>88</td>
<td>88 Negative</td>
</tr>
<tr>
<td>37.5 ng/mL</td>
<td>-25.0%</td>
<td>22</td>
<td>22 Negative</td>
<td>88</td>
<td>88 Negative</td>
</tr>
<tr>
<td>50 ng/mL</td>
<td>100.0%</td>
<td>22</td>
<td>8 Pos/14 Neg</td>
<td>88</td>
<td>46 Pos/42 Neg</td>
</tr>
<tr>
<td>62.5 ng/mL</td>
<td>+25.0%</td>
<td>22</td>
<td>22 Positive</td>
<td>88</td>
<td>88 Positive</td>
</tr>
<tr>
<td>75 ng/mL</td>
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<td>22</td>
<td>22 Positive</td>
<td>88</td>
<td>88 Positive</td>
</tr>
</tbody>
</table>

Linearity:
Hitachi 717 Instrument: 0 - 140 ng/mL
When comparing the result \( y \) and target \( x \) value, using the least squares regression technique, the regression equation and correlation are as follow:
\[
y = 1.0555x - 0.7832, \quad r^2 = 0.9945
\]

Method Comparison: Clinical Samples
From a total of eighty-five (85) clinical unaltered samples
For both Qualitative and Semi-Quantitative results:
100.0 % agreement with negative, 97.7 % agreement with positive samples

Endogenous Compound Interference and Specificity - Cross-Reactivity:
No significant undesired cross reactants or endogenous substance interference was observed. See product insert for list of compounds tested.
Shipping/Recovery Stability Study:
No significant sample degradation occurred following real-time and accelerated stability studies up to 72 hours. All sample shipments are based on the assumption of a 24 hour priority overnight delivery.

Sample Storage Stability Study:
No significant sample degradation occurred following real-time and accelerated stability studies up to 13 Days. Based on real-time studies, samples can be stored at 2-8 °C for up to 13 Days. Based on the Arrhenius equation, accelerated stability data supports at least 18 months of shelf-life storage at -20 °C. Real-time stability studies are on-going.

Open (and re-capped) vial Stability for Calibrator/Control:
Real time (2 - 8 °C) and accelerated stability studies (at room temperature and 30 °C) were carried out for 17 months (568 Days) and results indicated degradation at all three conditions was minimal. Thermal stability data supports at least 18 months of shelf life storage at 2 - 8 °C.

Closed Stability for Reagents Shelf-life:
Real-time stability studies were carried out for 17 months (568 Days) and results indicated degradation is minimal. Real-time stability data also supports at least 18 months of shelf life storage at 2 - 8 °C.

Summary:
The information provided in this pre-market notification demonstrates that the LZI Oral Fluid Amphetamine Enzyme Immunoassay (k131653) is substantially equivalent to the legally marketed predicate device for its general intended use. Substantial equivalence was demonstrated through comparison of intended use and physical properties to the commercially available predicate device as confirmed by gas or liquid chromatography/mass spectrometry (GC/MS or LC/MS), an independent analytical method. The information supplied in this pre-market notification provides reasonable assurance that the LZI Oral Fluid Amphetamine Enzyme Immunoassay is safe and effective for its stated intended use.
LIN-ZHI INTERNATIONAL, INC.  
BERNICE LIN  
VP OPERATIONS  
670 ALMANOR AVENUE  
SUNNYVALE CA 94085  

Re: K131653  
Trade/Device Name: LZI Oral Fluid Amphetamine Enzyme Immunoassay  
LZI Oral Fluid Amphetamine Calibrators and Controls  

Regulation Number: 21 CFR 862.3100  
Regulation Name: Amphetamine test system  
Regulatory Class: II  
Product Code: DKZ, DLU, LAS  
Dated: December 10, 2013  
Received: December 12, 2013  

Dear Dr. Lin:  

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.  

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.  

Please be advised that FDA’s issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act’s requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Parts 801 and 809); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.
If you desire specific advice for your device on our labeling regulations (21 CFR Parts 801 and 809), please contact the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638 2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH’s Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Courtney H. Lias, Ph.D.
2014.02.04 12:54:53 -05'00'

Courtney H. Lias, Ph.D.
Director
Division of Chemistry and Toxicology Devices
Office of In Vitro Diagnostics and Radiological Health
Center for Devices and Radiological Health

Enclosure
510(k) Number (if known)  
k131653

Device Name  
LZI Oral Fluid Amphetamine Enzyme Immunooassay and LZI Oral Fluid Amphetamine Calibrators and Controls

Indications for Use  
(Describe)

The LZI Oral Fluid Amphetamine Enzyme Immunoassay is intended for the qualitative and semi-quantitative determination of \(d\)-amphetamine in neat human oral fluid, collected into the LZI Oral Fluid Collector, at the cutoff value of 50 ng/mL. The assay is designed for prescription use with a number of automated clinical chemistry analyzers.

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Type of Use (Select one or both, as applicable)

- Prescription Use (Part 21 CFR 801 Subpart D)  
- Over-The-Counter Use (21 CFR 801 Subpart C)

PLEASE DO NOT WRITE BELOW THIS LINE – CONTINUE ON A SEPARATE PAGE IF NEEDED.

FOR FDA USE ONLY

Concurrence of Center for Devices and Radiological Health (CDRH) (Signature)

Avis T. Danishefsky -S
This section applies only to requirements of the Paperwork Reduction Act of 1995.

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Food and Drug Administration
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PRAStaff@fda.hhs.gov

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