



March 17, 2016

Food and Drug Administration  
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BIOFIRE DIAGNOSTICS, LLC  
KRISTEN KANACK, PHD  
VICE PRESIDENT, REGULATED PRODUCTS & CLINICAL AFFAIRS  
390 WAKARA WAY  
SALT LAKE CITY UT 84108

Re: K160462

Trade/Device Name: FilmArray Meningitis/Encephalitis (ME) Panel for use with FilmArray Torch

Regulation Number: 21 CFR 866.3970

Regulation Name: Device to detect and identify microbial pathogen nucleic acids in cerebrospinal fluid

Regulatory Class: II

Product Code: PLO

Dated: February 18, 2016

Received: February 19, 2016

Dear Dr. Kanack:

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 Industry and Consumer Education 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 Industry and Consumer Education 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,

**Steven R. Gitterman -S**

For Uwe Scherf, M.Sc., Ph.D.  
Director  
Division of Microbiology Devices  
Office of In Vitro Diagnostics  
and Radiological Health  
Center for Devices and Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known)

K160462

Device Name

FilmArray Meningitis/Encephalitis (ME) Panel

Indications for Use (Describe)

The FilmArray Meningitis/Encephalitis (ME) Panel is a qualitative multiplexed nucleic acid-based in vitro diagnostic test intended for use with FilmArray, FilmArray 2.0, and FilmArray Torch systems. The FilmArray ME Panel is capable of simultaneous detection and identification of multiple bacterial, viral, and yeast nucleic acids directly from cerebrospinal fluid (CSF) specimens obtained via lumbar puncture from individuals with signs and/or symptoms of meningitis and/or encephalitis. The following organisms are identified using the FilmArray ME Panel:

Bacteria:

- Escherichia coli K1
- Haemophilus influenzae
- Listeria monocytogenes
- Neisseria meningitidis (encapsulated)
- Streptococcus agalactiae
- Streptococcus pneumoniae

Viruses:

- Cytomegalovirus
- Enterovirus
- Herpes simplex virus 1
- Herpes simplex virus 2
- Human herpesvirus 6
- Human parechovirus
- Varicella zoster virus

Yeast:

- Cryptococcus neoformans/gattii

The FilmArray ME Panel is indicated as an aid in the diagnosis of specific agents of meningitis and/or encephalitis and results are meant to be used in conjunction with other clinical, epidemiological, and laboratory data. Results from the FilmArray ME Panel are not intended to be used as the sole basis for diagnosis, treatment, or other patient management decisions. Positive results do not rule out co-infection with organisms not included in the FilmArray ME Panel. The agent detected may not be the definite cause of the disease. Negative results do not preclude central nervous system (CNS) infection. Not all agents of CNS infection are detected by this test and sensitivity in clinical use may differ from that described in the package insert.

The FilmArray ME Panel is not intended for testing of specimens collected from indwelling CNS medical devices.

The FilmArray ME Panel is intended to be used in conjunction with standard of care culture for organism recovery, serotyping, and antimicrobial susceptibility testing.

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)

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**Special 510(k) Summary  
BioFire Diagnostics, LLC**

**FilmArray Meningitis/Encephalitis (ME) Panel for use with FilmArray Torch**

**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.

**Submitted by:**

BioFire Diagnostics, LLC  
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**Contact:**

Kristen J. Kanack, Ph.D.  
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**Date Submitted:**

February 18, 2016

**Trade Name:**

FilmArray Meningitis/Encephalitis (ME) Panel

**Classification Name:**

21 CFR 866.3970 – Device to detect and identify microbial pathogen nucleic acids in cerebrospinal fluid.

**Predicate Device:**

DEN150013 – FilmArray Meningitis/Encephalitis (ME) Panel

**Intended Use:**

The FilmArray Meningitis/Encephalitis (ME) Panel is a qualitative multiplexed nucleic acid-based in vitro diagnostic test intended for use with FilmArray systems. The FilmArray ME Panel is capable of simultaneous detection and identification of multiple bacterial, viral, and yeast nucleic acids directly from cerebrospinal fluid (CSF) specimens obtained via lumbar puncture from individuals with signs and/or symptoms of meningitis and/or encephalitis. The following organisms are identified using the FilmArray ME Panel:

**Bacteria:**

- *Escherichia coli* K1
- *Haemophilus influenzae*
- *Listeria monocytogenes*
- *Neisseria meningitidis* (encapsulated)
- *Streptococcus agalactiae*
- *Streptococcus pneumoniae*

Viruses:

- Cytomegalovirus
- Enterovirus
- Herpes simplex virus 1
- Herpes simplex virus 2
- Human herpesvirus 6
- Human parechovirus
- Varicella zoster virus

Yeast:

- *Cryptococcus neoformans/gattii*

The FilmArray ME Panel is indicated as an aid in the diagnosis of specific agents of meningitis and/or encephalitis and results are meant to be used in conjunction with other clinical, epidemiological, and laboratory data. Results from the FilmArray ME Panel are not intended to be used as the sole basis for diagnosis, treatment, or other patient management decisions. Positive results do not rule out co-infection with organisms not included in the FilmArray ME Panel. The agent detected may not be the definite cause of the disease. Negative results do not preclude central nervous system (CNS) infection. Not all agents of CNS infection are detected by this test and sensitivity in clinical use may differ from that described in the package insert.

The FilmArray ME Panel is not intended for testing of specimens collected from indwelling CNS medical devices.

The FilmArray ME Panel is intended to be used in conjunction with standard of care culture for organism recovery, serotyping, and antimicrobial susceptibility testing.

**Device Description:**

The FilmArray Meningitis/Encephalitis (ME) Panel is a multiplex nucleic acid test designed to be used with FilmArray systems. The FilmArray ME pouch contains freeze-dried reagents to perform nucleic acid purification and nested, multiplex PCR with DNA melt analysis. The FilmArray Meningitis/Encephalitis (ME) Panel simultaneously conducts 14 tests for the identification of potential CNS pathogens from CSF specimens obtained via lumbar puncture (Table 1). Results from the FilmArray ME Panel test are available within about one hour.

**Table 1. Analytes identified by the FilmArray ME Panel**

<b>Bacteria</b>	<b>Viruses</b>
<i>Escherichia coli</i> K1	Cytomegalovirus (CMV)
<i>Haemophilus influenzae</i>	Enterovirus (EV)
<i>Listeria monocytogenes</i>	Herpes simplex virus 1 (HSV 1)
<i>Neisseria meningitidis</i>	Herpes simplex virus 2 (HSV 2)
<i>Streptococcus agalactiae</i>	Human herpesvirus 6 (HHV-6)
<i>Streptococcus pneumoniae</i>	Human parechovirus (HPeV)
<b>Yeast</b>	Varicella zoster virus (VZV)
<i>Cryptococcus neoformans/gattii</i>	

A test is initiated by loading Hydration Solution into one port of the FilmArray pouch and a CSF sample mixed with the provided Sample Buffer into the other port of the FilmArray ME pouch and placing it in the FilmArray Instrument. The pouch contains all of the reagents required for specimen testing and analysis in a freeze-dried format; the addition of Hydration Solution and Sample/Buffer Mix rehydrates the reagents. After the pouch is prepared, the FilmArray Software guides the user through the steps of placing the pouch into the instrument, scanning the pouch barcode, entering the sample identification, and initiating the run.

The FilmArray instrument contains a coordinated system of inflatable bladders and seal points, which act on the pouch to control the movement of liquid between the pouch blisters. When a bladder is inflated over a reagent blister, it forces liquid from the blister into connecting channels. Alternatively, when a seal is placed over a connecting channel it acts as a valve to open or close a channel. In addition, electronically controlled pneumatic pistons are positioned over multiple plungers in order to deliver the rehydrated reagents into the blisters at the appropriate times. Two Peltier devices control heating and cooling of the pouch to drive the PCR reactions and the melt curve analysis.

Nucleic acid extraction occurs within the FilmArray pouch using mechanical and chemical lysis followed by purification using standard magnetic bead technology. After extracting and purifying nucleic acids from the unprocessed sample, a nested multiplex PCR is executed in two stages. During the first stage, a single, large volume, highly multiplexed reverse transcription PCR (rt-PCR) reaction is performed. The products from first stage PCR are then diluted and combined with a fresh, primer-free master mix and a fluorescent double stranded DNA binding dye (LC Green<sup>®</sup> Plus, BioFire Defense, LLC). The solution is then distributed to each well of the array. Array wells contain sets of primers designed specifically to amplify sequences internal to the PCR products generated during the first stage PCR reaction. The 2<sup>nd</sup> stage PCR, or nested PCR, is performed in each well of the array. At the conclusion of the 2<sup>nd</sup> stage PCR, the array is interrogated by melt curve analysis for the detection of signature amplicons denoting the presence of specific targets. A digital camera placed in front of the array captures fluorescent images of the PCR2 reactions and software interprets the data.

The FilmArray software automatically interprets the results of each DNA melt curve analysis and combines the data with the results of the internal pouch controls to provide a test result for each organism on the panel.

### **Device Comparison:**

The purpose of this submission is to add FilmArray Torch as an additional instrument system for use with the FilmArray Meningitis/Encephalitis (ME) Panel. There have been no changes to the previously cleared FilmArray ME Panel reagent kit itself. In order to increase throughput capacity, the FilmArray 2.0 was modified to develop the FilmArray Torch by organizing densely packaged instruments (now called FilmArray Torch Modules) into a “tower” configuration having the computer with touchscreen interface incorporated into the system base. Pouches are now inserted horizontally rather than from the top. This configuration allows the FilmArray Torch Modules to be stacked directly on top of each other to minimize system footprint.

The following table compares the FilmArray ME Panel for use with the FilmArray Torch to the previously cleared FilmArray ME Panel for Use with the FilmArray 2.0 (DEN150013). The table outlines the similarities and differences between the two systems.

**Table 2. Comparison of the FilmArray Meningitis/Encephalitis Panel for use with the FilmArray Torch to the current FilmArray Meningitis/Encephalitis Panel.**

Element	Modified Device: FilmArray Meningitis/Encephalitis (ME) Panel for use with FilmArray Torch	Predicate: FilmArray Meningitis/Encephalitis (ME) Panel for use with FilmArray 2.0 (DEN150013)
Organisms Detected	<p><b>Bacteria:</b></p> <ul style="list-style-type: none"> <li>• <i>Escherichia coli</i> K1</li> <li>• <i>Haemophilus influenzae</i></li> <li>• <i>Listeria monocytogenes</i></li> <li>• <i>Neisseria meningitidis</i> (encapsulated)</li> <li>• <i>Streptococcus agalactiae</i></li> <li>• <i>Streptococcus pneumoniae</i></li> </ul> <p><b>Viruses:</b></p> <ul style="list-style-type: none"> <li>• Cytomegalovirus</li> <li>• Enterovirus</li> <li>• Herpes simplex virus 1</li> <li>• Herpes simplex virus 2</li> <li>• Human herpesvirus 6</li> <li>• Human parechovirus</li> <li>• Varicella zoster virus</li> </ul> <p><b>Yeast:</b></p> <ul style="list-style-type: none"> <li>• <i>Cryptococcus neoformans/gattii</i></li> </ul>	Same
Analyte	RNA/DNA	Same
Specimen Types	Cerebrospinal Fluid	Same
Technological Principles	Nested multiplex RT-PCR followed by high resolution melting analysis to confirm identity of amplified product.	Same
Instrumentation	Single instrument FilmArray System, FilmArray 2.0 System, or FilmArray Torch System	Single instrument FilmArray system or FilmArray 2.0 system
Instrument-Software Communication	Communication for multiple FilmArray Torch Modules travels via Ethernet cable/port.	Same (multiple instruments)
Time to result	About 1 hour	Same
Test Interpretation	Automated test interpretation and report generation. User cannot access raw data.	Same
Reagent Hydration and Sample Loading	FilmArray Injection Vial-based loading procedure	Same
Sample	Sample Processing is automated in the	Same

Element	Modified Device: FilmArray Meningitis/Encephalitis (ME) Panel for use with FilmArray Torch	Predicate: FilmArray Meningitis/Encephalitis (ME) Panel for use with FilmArray 2.0 (DEN150013)
Preparation Method	FilmArray ME pouch.	
Reagent Storage	Reagents are stored at room temperature.	Same
Controls	Two controls are included in each reagent pouch to control for sample processing and both stages of PCR and melt analysis.	Same
User Complexity	Moderate/Low	Same

### Performance Characteristics of FilmArray ME Panel on FilmArray Torch

Contrived samples containing each FilmArray ME Panel analyte at low positive levels (1x LoD) were tested on three complete FilmArray Torch systems (12 FilmArray Torch Modules per system) over five days (30 replicates per analyte per system for 90 total replicates per analyte). Reproducible detection at LOD was confirmed for each FilmArray ME analyte with the expected Detected results for  $\geq 95.6\%$  of samples tested on FilmArray Torch systems. Agreement with the expected negative results (Not Detected) was  $>98\%$  for each analyte.

#### Conclusion:

The intended use and fundamental scientific technology of the FilmArray ME Panel used with the modified device, FilmArray Torch, is unchanged from use of the legally marketed FilmArray ME Panel on FilmArray and FilmArray 2.0 systems. Non-clinical validation studies have established that the performance characteristics of FilmArray ME, including reproducibility, are substantially equivalent on FilmArray, FilmArray 2.0, and FilmArray Torch. These data demonstrate that the device performs as well as the predicate device.