

K092355

**510(k) Summary**

1. **Company:** Bio-Rad Laboratories  
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OCT 29 2009

Contact: Linda Staswick  
Date Summary Prepared: October 22, 2009

2. **Device Name:**

<b>Device Trade Name:</b>	MONOLISA™ Anti-HAV EIA	EVOLIS™ Automated Microplate System
<b>Common Name:</b>	Total Antibody to Hepatitis A Virus	Automated Laboratory Analyzer
<b>Classification Name:</b>	Hepatitis A Test (Total Antibody)	Discrete photometric chemistry analyzer for clinical use
<b>Product Code:</b>	LOL	JJE
<b>Regulation Number:</b>	21 CFR 866.3310	21 CFR 862.2160
<b>Regulatory Class:</b>	Class II	Class I
<b>Panel:</b>	Microbiology	Chemistry

3. **Substantial Equivalence:**

The MONOLISA™ Anti-HAV EIA used with the EVOLIS™ Automated Microplate System is substantially equivalent to the MONOLISA™ Anti-HAV EIA using the manual method (k063318).

4. **Description of the Device:**

The MONOLISA™ Anti-HAV EIA is an enzyme immunoassay (competitive assay format) for the detection of total antibodies to hepatitis A virus. In the assay procedure, patient specimens, a Calibrator and controls are incubated with HAV antigen in microwells that have been coated with mouse monoclonal anti-hepatitis A antibodies. Antibodies to HAV present in a specimen or control will complex with the HAV antigen reagent and with antibodies coated on the microwells. Excess sample and HAV Viral Antigen reagent are removed by a wash step. The Conjugate (containing horseradish peroxidase-labeled mouse monoclonal antibody to HAV) is subsequently added to the microwells and incubated. The Conjugate binds to the HAV antigen bound to the microwell, in the absence of antibodies to HAV from the specimen. Excess Conjugate is removed by a wash step, and a TMB Chromogen/Substrate solution is added to the microwells and allowed to incubate. If a sample does not contain anti-HAV antibodies, the bound enzyme (HRP) causes the colorless tetramethylbenzidine (TMB) in the Chromogen solution to change to blue. The blue color turns yellow after the addition of a Stopping Solution. If a sample contains anti-HAV antibodies, the Chromogen/Substrate solution in the well remains colorless during the substrate incubation, and after the addition of the Stopping Solution. The color intensity is measured spectrophotometrically. Absorbance value readings for patient specimens are compared to the Cutoff value determined by the mean of the Calibrator absorbance values.

The performance of the MONOLISA™ Anti-HAV EIA was evaluated in conjunction with the EVOLIS™ Automated Microplate System. The EVOLIS™ Automated Microplate System is a

fully automated microplate analyzer that performs all functions necessary for the complete processing of microplate assays. Functions include: barcode scanning, sample pre-dilutions, sample and reagent dispensing, plate incubations, plate wash cycles, photometric measurement of completed assay plates and results evaluation. The analyzer instrument is controlled via the EVOLIS™ software, a Windows® 2000 application running on a separate dedicated PC. An operator loads the appropriate microplates, assay reagents, and patient and control samples, then selects assay parameters, loads sample information, initiates instrument processing, and generates result reports.

#### **5. Intended Use:**

The MONOLISA™ Anti-HAV EIA is an in vitro enzyme immunoassay kit intended for use in the qualitative detection of total antibodies (IgG and IgM) to hepatitis A virus (anti-HAV) in human (adult and pediatric) serum or plasma (EDTA, Heparin, Citrate, ACD). This kit can be used as an aid in the diagnosis of acute or past hepatitis A virus (HAV) infection or as an aid in the identification of HAV-susceptible individuals for vaccination. However, any diagnosis should take into consideration the patient's clinical history and symptoms, as well as serological data. The MONOLISA™ Anti-HAV EIA is intended for manual use and with the Evolis™ Automated Microplate System in the detection of total antibodies to hepatitis A virus.

Assay performance characteristics have not been established for immunocompromised or immunosuppressed patients, and cord blood or neonatal specimens.

**Warning: This assay is not intended for screening blood or solid or soft tissue donors.**

#### **6. Technological Characteristics**

The following tables summarize similarities and differences between the MONOLISA™ Anti-HAV EIA tested manually and the MONOLISA™ Anti-HAV EIA tested with the EVOLIS™ Automated Microplate System.

**Table 1: Similarities between devices**

Parameter	MONOLISA™ Anti-HAV EIA tested with the EVOLIS™ Automated Microplate System	MONOLISA™ Anti-HAV EIA tested manually
Intended Use/Indications for Use	The MONOLISA™ Anti-HAV EIA is an in vitro enzyme immunoassay kit intended for use in the qualitative detection of total antibodies (IgG and IgM) to hepatitis A virus (anti-HAV) in human (adult and pediatric) serum or plasma (EDTA, Heparin, Citrate, ACD)	The MONOLISA™ Anti-HAV EIA is an in vitro enzyme immunoassay kit intended for use in the qualitative detection of total antibodies (IgG and IgM) to hepatitis A virus (anti-HAV) in human (adult and pediatric) serum or plasma (EDTA, Heparin, Citrate, ACD)
Assay procedure	Per the instructions in the package insert	Per the instructions in the package insert
Plate incubation	60 ± 5 minutes at 37°C + 2°C	60 ± 5 minutes at 37°C + 2°C
Plate washing	Wash with ≥ 370 µL of Working Wash Solution per well, and 30 - 60 second soak between each wash cycle for a total of 5 cycles.	Wash with ≥ 370 µL of Working Wash Solution per well, and 30 - 60 second soak between each wash cycle for a total of 5 cycles.
Result interpretation	Result interpretations, based on sample O.D.s, are determined according to package insert criteria.	Result interpretations, based on sample O.D.s, are determined according to package insert criteria.
Photometric measurement of completed assay plates	Read absorbance using 450 nm filter with 620 nm as the reference	Read absorbance using 450 nm filter with 615 to 630 nm as the reference

**Table 2: Differences between devices**

Parameter	MONOLISA™ Anti-HAV EIA tested with the EVOLIS™ Automated Microplate System	MONOLISA™ Anti-HAV EIA tested manually
Sample and reagent dispensing	Samples and reagents are dispensed by the automated system	Samples and reagents are dispensed manually
Barcode reading	Sample and reagent ID are verified automatically	NA or can be performed manually with barcode wand
Plate incubation	Plates are automatically moved to the incubation chamber	Plates are moved manually to an incubation chamber
Plate wash cycles	Plates are automatically washed	Plates are moved manually to an automated plate washer
Data management	Archives and retrieves data and sample information	NA
Spectrophotometric verification of sample and reagent pipeting	Performed automatically	Optional verification visually or with microplate reader

**7. Performance Characteristics:**

The performance of the MONOLISA™ Anti-HAV EIA with the EVOLIS™ Automated Microplate System was compared to the MONOLISA™ Anti-HAV EIA tested manually, which had previously received marketing clearance from the Agency. Substantial equivalence of the MONOLISA™ Anti-HAV EIA, using manual equipment, was determined May 3, 2007 (k063318).

### Correlation/method comparison

Studies have been performed with the MONOLISA™ Anti-HAV EIA on the EVOLIS™ Automated System and compared to the results of testing the same kits and samples with the manual method. In this study 688 retrospective samples were tested on the MONOLISA™ Anti-HAV assay using four (4) EVOLIS™ instruments at three sites. The same samples were tested manually (reference method) on the MONOLISA™ Anti-HAV assay. The positive, negative and overall percent agreement along with the 95% confidence interval are presented below. In determining the percent agreement on borderline results, specimens that were borderline with the reference assay and negative with EVOLIS™ were considered as false negative for the EVOLIS™; specimens that were borderline with the reference assay and reactive with EVOLIS™ were considered as false positive for the EVOLIS™.

**Table 2: MONOLISA™ Anti-HAV EIA on EVOLIS™ vs. Manual Results**

Manual Anti-HAV Results	EVOLIS™ Anti-HAV Results			
	Reactive	Borderline	Nonreactive	Total
Reactive	336	2	1	339
Borderline	2	0	1	3
Nonreactive	2	5	339	346
Total	340	7	341	688

The positive percent agreement with the reference method, manual testing, is 98.8% (336/340) with a 95% confidence interval of 97.0 – 99.5%. The negative percent agreement with the reference method is 97.4% (339/348) with a 95% confidence interval of 95.2 – 98.6%. The overall percent agreement is 98.1% (675/688) with a 95% confidence interval of 96.8 – 98.9%.

The EVOLIS™ was also evaluated by performing a combination of 2 assays on the same plate. In this study 315 samples were tested with the MONOLISA Anti-HAV assay on a combination plate on EVOLIS™ (both the MONOLISA™ Anti-HAV EIA and MONOLISA™ Anti-HAV IgM EIA assays were run in a single microplate frame). Results were compared to the same samples tested manually (the reference method, individual plate format) on the MONOLISA™ Anti-HAV assay.

**Table 3: MONOLISA™ Anti-HAV EIA on EVOLIS™ Combination Plate Testing vs. Manual Results**

Manual Anti-HAV Results Combination Plate	EVOLIS™ Anti-HAV Results Individual Plate			
	Reactive	Borderline	Nonreactive	Total
Reactive	161	0	0	161
Borderline	0	0	0	0
Nonreactive	0	0	154	154
Total	161	0	154	315

The positive percent agreement with the reference method, manual testing, is 100% (161/161) with a 95% confidence interval of 97.7 – 100%. The negative percent agreement with the reference method is 100% (154/154) with a 95% confidence interval of 97.6 – 100%. The overall percent agreement is 100% (315/315) with a 95% confidence interval of 98.8 – 100%.

## Precision Study (Within-Laboratory)

In precision studies a 21-member panel was tested: three (3) serum samples with six (6) corresponding plasma samples (EDTA K2, EDTA K3, Sodium Citrate, Sodium Heparin, Lithium Heparin, ACD) at three (3) different levels [1 low positive near the cutoff (Panel Set 1), 1 negative near the cutoff (Panel Set 2) and 1 negative (Panel Set 3)]. The kit controls and calibrator were also tested for a total of 24 samples. Two replicates each of the twenty-four (24) samples were assayed twice a day for 20 days. The data were analyzed following the CLSI guidance EP5-A2, *Evaluation of Precision Performance of Quantitative Measurement Methods*. The mean ratio, the Standard Deviation (SD) and percent coefficient of variation (%CV) were calculated for each panel member.

The data summary is shown in the following tables, which summarize testing with the EVOLIS™ Automated System:

**Table 4: MONOLISA™ Anti-HAV EIA Precision Results by Panel Member Cutoff to Signal (CO/S)**

Panel Member	N	Mean	Within run <sup>1</sup>		Between Run <sup>2</sup>		Between Day <sup>3</sup>		Total <sup>4</sup>	
		CO/S	SD	% CV	SD	% CV	SD	% CV	SD	% CV
Positive Control	80	4.63	0.208	4.5	0.312	6.7	0.750	16.2	0.839	18.1
Negative Control	76 <sup>5</sup>	0.36	0.012	3.4	0.023	6.4	0.014	4.1	0.030	8.3
Cutoff Control	80	0.91	0.032	3.5	0.067	7.4	0.098	10.8	0.123	13.6
Serum (1)	80	1.13	0.051	4.6	0.060	5.3	0.107	9.5	0.133	11.8
EDTA K2 (1)	80	1.16	0.042	3.7	0.064	5.5	0.080	6.9	0.111	9.6
EDTA K3 (1)	80	1.16	0.044	3.8	0.091	7.9	0.077	6.7	0.127	11.0
Sodium Citrate (1)	80	1.12	0.047	4.2	0.090	8.0	0.084	7.5	0.131	11.8
Sodium Heparin (1)	80	1.24	0.061	4.9	0.084	6.8	0.111	9.0	0.152	12.3
Lithium Heparin (1)	80	1.18	0.036	3.1	0.077	6.6	0.120	10.2	0.147	12.5
ACD (1)	80	0.40	0.011	2.7	0.026	6.4	0.038	9.4	0.047	11.7
Serum (2)	80	0.64	0.023	3.6	0.033	5.1	0.022	3.4	0.045	7.1
EDTA K2 (2)	80	0.63	0.021	3.4	0.038	6.0	0.030	4.8	0.053	8.4
EDTA K3 (2)	80	0.62	0.019	3.1	0.043	7.0	0.030	4.9	0.056	9.1
Sodium Citrate (2)	80	0.63	0.020	3.1	0.044	7.0	0.037	5.9	0.061	9.7
Sodium Heparin (2)	80	0.68	0.022	3.3	0.042	6.2	0.070	10.4	0.085	12.6
Lithium Heparin (2)	80	0.61	0.020	3.2	0.037	6.1	0.044	7.1	0.061	9.9
ACD (2)	80	0.59	0.014	2.4	0.041	7.0	0.058	9.8	0.073	12.3
Serum (3)	80	0.41	0.008	1.9	0.026	6.3	0.019	4.7	0.033	8.1
EDTA K2 (3)	80	0.41	0.019	4.6	0.031	7.7	0.017	4.1	0.040	9.9
EDTA K3 (3)	80	0.41	0.013	3.0	0.029	7.1	0.019	4.6	0.037	8.9
Sodium Citrate (3)	80	0.43	0.011	2.7	0.028	6.5	0.021	4.9	0.037	8.6
Sodium Heparin (3)	80	0.43	0.008	2.0	0.025	5.9	0.039	9.1	0.047	11.0
Lithium Heparin (3)	80	0.40	0.014	3.5	0.027	6.8	0.037	9.2	0.048	12.0
ACD (3)	80	1.07	0.036	3.4	0.081	7.6	0.141	13.2	0.167	15.6

<sup>1</sup> Within Run: variability of the assay performance from replicate to replicate

<sup>2</sup> Between Run: variability of the assay performance from run to run

<sup>3</sup> Between Day: variability of the assay performance from day to day

<sup>4</sup> Total: total variability of the assay performance includes within run, between run and between day.

<sup>5</sup> 4 replicates did not meet volume verification requirements

## Reproducibility Study

A 6-member panel consisting of diluted plasma specimens (negative and different levels of positive) was tested in triplicate, once a day for 5 days with the MONOLISA™ Anti-HAV EIA at 3 separate clinical trial sites. Each panel was coded with a different number on each day tested in order to blind the operator to the expected value of the sample. One (1) lot was used at each of 3 sites.

The data from all sites were combined to obtain standard deviation (SD) and percent coefficient of variation (CV) for within run, between day, between site and total variance. The data were analyzed according to the principles described in the Clinical Laboratory Standards Institute guidance EP15-A2, *User Protocol for Evaluation of Qualitative Test Performance*. The summaries are shown in the following tables:

**Table 5: MONOLISA™ Anti-HAV EIA Reproducibility Results by Panel Member Cutoff to Signal (CO/S)**

Test Site	ID #	Panel Member	N	Mean (CO/S)	Within Run <sup>1</sup>		Between Day <sup>2</sup>		Total <sup>3</sup>	
					SD	%CV	SD	%CV	SD	%CV
Site #1	P1	Negative	30	0.41	0.024	5.8	0.000 <sup>4</sup>	0.0	0.024	5.8
	P2	High Negative	30	0.81	0.044	5.5	0.000 <sup>4</sup>	0.0	0.044	5.5
	P3	Low Positive	30	1.32	0.080	6.1	0.027	2.0	0.084	6.4
	P4	Low Positive	30	2.14	0.163	7.7	0.082	3.8	0.183	8.6
	P5	Positive	30	2.85	0.147	5.1	0.120	4.2	0.190	6.7
	P6	Positive	30	4.06	0.125	3.1	0.271	6.7	0.298	7.3
	P7	Positive Control	30	3.70	0.180	4.9	0.229	6.2	0.292	7.9
	P8	Negative Control	30	0.39	0.020	5.1	0.009	2.2	0.021	5.5
	P9	Cutoff Calibrator	30	0.96	0.066	6.8	0.033	3.4	0.073	7.6
Site #2	P1	Negative	30	0.41	0.026	6.4	0.000 <sup>4</sup>	0.0	0.026	6.4
	P2	High Negative	30	0.82	0.049	6.0	0.029	3.5	0.057	6.9
	P3	Low Positive	30	1.32	0.061	4.6	0.059	4.4	0.084	6.4
	P4	Low Positive	30	2.17	0.153	7.1	0.080	3.7	0.173	8.0
	P5	Positive	30	2.83	0.125	4.4	0.167	5.9	0.208	7.4
	P6	Positive	30	4.05	0.158	3.9	0.327	8.1	0.363	9.0
	P7	Positive Control	30	3.74	0.153	4.1	0.253	6.8	0.295	7.9
	P8	Negative Control	27	0.38	0.011	2.8	0.011	2.8	0.015	3.9
	P9	Cutoff Calibrator	27	0.95	0.039	4.1	0.014	1.5	0.042	4.4
Site #3	P1	Negative	30	0.40	0.017	4.3	0.012	3.0	0.021	5.3
	P2	High Negative	30	0.78	0.041	5.3	0.051	6.5	0.065	8.4
	P3	Low Positive	30	1.28	0.047	3.6	0.072	5.6	0.086	6.7
	P4	Low Positive	30	2.08	0.094	4.5	0.116	5.6	0.149	7.2
	P5	Positive	30	2.77	0.104	3.7	0.201	7.3	0.226	8.2
	P6	Positive	30	4.02	0.187	4.7	0.285	7.1	0.341	8.5
	P7	Positive Control	30	3.64	0.173	4.7	0.383	10.5	0.420	11.5
	P8	Negative Control	30	0.38	0.025	6.5	0.016	4.4	0.030	7.9
	P9	Cutoff Calibrator	30	0.93	0.059	6.3	0.056	6.0	0.081	8.7

<sup>1</sup> Within Run: variability of the assay performance from replicate to replicate

<sup>2</sup> Between Day: variability of the assay performance from day to day

<sup>3</sup> Total: total variability of the assay performance includes within run and between day

<sup>4</sup> Negative variances were rounded to zero, per statistical convention.

**Table 6: MONOLISA™ Anti-HAV EIA Reproducibility Summary by Panel Member Cutoff to Signal (CO/S)  
All Three Sites**

Panel Member	N	Mean	Within Run <sup>1</sup>		Between Day <sup>2</sup>		Between Site <sup>3</sup>		Total <sup>4</sup>	
		CO/S	SD	%CV	SD	%CV	SD	%CV	SD	%CV
P1	90	0.41	0.023	5.7	0.005	1.2	0.004	1.1	0.024	5.9
P2	90	0.80	0.045	5.6	0.033	4.1	0.014	1.7	0.058	7.2
P3	90	1.30	0.064	4.9	0.054	4.2	0.000 <sup>5</sup>	0.0	0.084	6.4
P4	90	2.13	0.140	6.6	0.091	4.3	0.000 <sup>5</sup>	0.0	0.167	7.9
P5	90	2.82	0.126	4.5	0.157	5.6	0.000 <sup>5</sup>	0.0	0.201	7.1
P6	90	4.04	0.159	3.9	0.273	6.8	0.000 <sup>5</sup>	0.0	0.316	7.8
P7	90	3.69	0.169	4.6	0.276	7.5	0.000 <sup>5</sup>	0.0	0.324	8.8
P8	87	0.38	0.019	5.1	0.012	3.1	0.000 <sup>5</sup>	0.0	0.023	6.0
P9	87	0.95	0.056	5.9	0.038	4.0	0.000 <sup>5</sup>	0.0	0.068	7.1

<sup>1</sup> Within Run: variability of the assay performance from replicate to replicate

<sup>2</sup> Between Day: variability of the assay performance from day to day

<sup>3</sup> Between Site: variability of the assay performance from site to site

<sup>4</sup> Total: total variability of the assay performance includes within run and between day, and between site

<sup>5</sup> Negative variances were rounded to zero, per statistical convention.

### Pipettor and washer carry-over

The pipette carryover study verified that the disposable tip pipettes on the EVOLIS™ do not carry residuals from one sample or well to another. In a washer carryover study, it was verified that the washer on the EVOLIS™ does not carry residuals from one well to another during the washing steps.

### Pipetting accuracy

Dye studies were performed to determine pipetting accuracy for samples and reagents with the EVOLIS™ Automated Microplate System. These studies were conducted using 2 different volumes for samples and controls, and demonstrated pipetting accuracy with a CV of  $\leq 7.7\%$  across the microwell plate.

## 8. Conclusion

The MONOLISA™ Anti-HAV EIA tested with the EVOLIS™ Automated Microplate System demonstrated equivalent performance to the MONOLISA™ Anti-HAV EIA tested with the manual assay method, which had previously received FDA 510(k) clearance.



Food and Drug Administration  
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Building 66  
Silver Spring, MD 20993

Bio-Rad Laboratories  
Attn: Linda Staswick  
6565 185<sup>th</sup> Ave. NE  
Redmond, WA 98052

OCT 29 2009

Re: K092355

Trade/Device Name: MONOLISA™ Anti-HAV EIA with the EVOLIST™ Automated  
Microplate System

Regulation Number: 21 CFR 866.3310

Regulation Name: Hepatitis A virus (HAV) serological assays

Regulatory Class: Class II

Product Codes: LOL, JJE

Dated: July 30, 2009

Received: August 4, 2009

Dear Ms. Staswick:

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.

If your device is classified (see above) into class II (Special Controls), it may be subject to such additional controls. Existing major regulations affecting your device can be found in Title 21, Code of Federal Regulations (CFR), Parts 800 to 895. 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); and good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820). This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Parts 801 and 809), please contact the Office of *In Vitro* Diagnostic Device Evaluation and Safety at (301) 796-5450. 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/cdrh/industry/support/index.html>.

Sincerely yours,



Sally Hojvat, Ph.D.

Director

Division of Microbiology Devices

Office of In Vitro Diagnostics

Center for Devices and Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known): K092355

Device Name: MONOLISA™ Anti-HAV EIA

Indication For Use:

The MONOLISA™ Anti-HAV EIA is an in vitro enzyme immunoassay kit intended for use in the qualitative detection of total antibodies (IgG and IgM) to hepatitis A virus (anti-HAV) in human (adult and pediatric) serum or plasma (EDTA, Heparin, Citrate, ACD). This kit can be used as an aid in the diagnosis of acute or past hepatitis A virus (HAV) infection or as an aid in the identification of HAV-susceptible individuals for vaccination. However, any diagnosis should take into consideration the patient's clinical history and symptoms, as well as serological data. The MONOLISA™ Anti-HAV EIA is intended for manual use and with the EVOLIS™ Automated Microplate System in the detection of total antibodies to hepatitis A virus.

Assay performance characteristics have not been established for immunocompromised or immunosuppressed patients, and cord blood or neonatal specimens.

**Warning: This assay is not intended for screening blood or solid or soft tissue donors.**

Prescription Use  X   
(21 CFR Part 801 Subpart D)

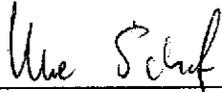
And/Or

Over the Counter Use    
(21 CFR Part 801 Subpart C)

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Concurrence of CDRH, Office of In Vitro Diagnostic Device Evaluation and Safety (OIVD)



Division Sign-Off  
Office of In Vitro Diagnostic Device  
Evaluation and Safety

510(k)  K092355