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**SUMMARY OF SAFETY & EFFECTIVENESS**



MAR 10 2010

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

**APPLICANT** NeoMed, Inc.  
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**TRADE NAME:** NeoMed Sterile Syringe

**CLASSIFICATION NAME:** Piston Syringe

**DEVICE CLASSIFICATION** Class II per 21 CFR §880.5560

**AND PRODUCT CODE** Product Code: FMF

**PREDICATE DEVICE NAME** Baxa Syringe (K951871)

**SUBSTANTIAL EQUIVALENCE:**

The NeoMed Sterile Syringe is substantially equivalent to the Baxa Syringe cleared under K951871.

Both devices have the same method of operation to dispense, measure and transfer fluids through the use of a plunger type syringe. The materials used in both devices are similar as well the indications for use.

Bench testing has demonstrated that the NeoMed Sterile Syringe is functionally equivalent to predicate Baxa Syringe and that any minor differences do not affect safety or effectiveness.

#### **DESCRIPTION OF THE DEVICE:**

The NeoMed Sterile Syringe is specifically designed for administration of enteral liquids to neonatal patients. The NeoMed Sterile Syringe is a standard piston syringe which is incompatible with luer-lock and intravenous devices. The NeoMed Sterile Syringes are compatible with NeoMed enteral-only connectors, the NeoMed orange extension sets and feeding tubes to form a dedicated system that prevents wrong-route administration of non-IV fluids and other competitive enteral/feeding tube, extension set type products that do not utilize a luer-lock system. They possess translucent barrels to provide visualization of fluid contents and volume, and patented orange lettering/gradient markings which coordinate with NeoMed orange extension sets and feeding tubes. NeoMed Sterile Syringes are manufactured as a single piece molded barrel that does not rely on adapters to create an oral tip. The NeoMed Sterile Syringes possess design features that prevent connectivity to luer type devices, and hence prevents the chance that a feeding tube could be infused into the IV line. The NeoMed Sterile Syringes will be available in 1ml, 3ml, 6ml, 12ml, 20ml, 35ml and 60ml individual packs.

The NeoMed Sterile Syringe device consists of the following components:

- Syringe Barrel
- Syringe Plunger
- Syringe Gasket
- Syringe Tip
- Syringe Cap

#### **INDICATIONS FOR USE:**

The device is indicated for use as a dispenser, a measuring device and an oral fluid transfer device. It is used to inject fluids into the body via extension sets and feeding tubes in neonatal and small pediatric patients.

#### **PERFORMANCE DATA:**

The NeoMed Sterile Syringe materials that come in direct contact with the patient have a long history of use in syringe manufacturing and are biocompatible according to ISO 10993 test results. Design verification performance test results demonstrate that the NeoMed Sterile Syringe performs its intended use and that any minor differences from the predicate do not affect safety or effectiveness.

#### **CONCLUSION:**

Based on the method of operation, indications for use, materials of construction and performance testing, it can be concluded that the NeoMed Sterile Syringe is equivalent to the predicate Baxa Syringe with respect to intended use and technological characteristics.



AUG 10 2010

Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Room –WO66-G609  
Silver Spring, MD 20993-0002

NeoMed, Incorporated  
C/O Ms. Penny Northcutt  
Regulatory Consultant  
REGSolutions, LLC  
717 Lakeglen Drive  
Suwanee, Georgia 30024

Re: K092908

Trade/Device Name: NeoMed Sterile Syringe, Models SD-S1EO, SD-S3EO, SD-S6EO,  
SD-S12EO, SD-S20EO, SD-S35EO, SD-S60EO  
Regulation Number: 21 CFR 880.5860  
Regulation Name: Piston Syringe  
Regulatory Class: II  
Product Code: FMF  
Dated: February 5, 2010  
Received: February 16, 2010

Dear Ms. Northcutt:

This letter corrects our substantially equivalent letter of March 10, 2010.

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 Part 801); 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 regulation (21 CFR Part 801), please go to

<http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. 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 as 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,

  
fd

Anthony D. Watson, B.S., M.S., M.B.A  
Director

Division of Anesthesiology, General Hospital,  
Infection Control and Dental Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

