

SPECIAL 510(k): Device Modification  
OIR Decision Memorandum

To: THE FILE

RE: DOCUMENT NUMBER K160445

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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 (delete/add items as necessary):

1. The name and 510(k) number of the SUBMITTER'S previously cleared device: HemosIL Silica Clotting Time (K050221)
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 and package labeling.
3. A description of the device **MODIFICATION(S)**, including clearly labeled diagrams, engineering drawings, photographs, user's and/or service manuals in sufficient detail, demonstrated that the **FUNDAMENTAL SCIENTIFIC TECHNOLOGY** of the modified device **has not changed**.  
**This change was for** modification of the Summary and Principle section and the Limitations/Interfering Substances section of the HemosIL Silica Clotting Time insert sheet, in which the heparin interference reference levels was replaced with a statement to indicate that patient samples containing heparin may exhibit falsely prolonged clotting times which could lead to incorrect results.
4. **Comparison Information** (similarities and differences) to applicant's legally marketed predicate device including labeling, intended use/indication for use, methodology, insert sheet, physical characteristics are located in 510(k) Summary.
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. The Risk Analysis was conducted in accordance with ISO 14971, Medical devices – Application of risk management to medical devices. Since there are no modifications to the design, manufacture, performance characteristics, or intended use of the product, the proposed change to the HemosIL Silica Clotting Time package insert sheet has no impact on the safety or effectiveness of the product.
  - b) Based on the risk analysis of the proposed change to the package insert sheet of HemosIL Silica Clotting Time product, no verification or validation studies are required to support the changes and there is on impact on the safety or effectiveness of the product.

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 (or their preamendment) device.