April 9, 2025

Active Protective Technologies, Inc.
℅ Valerie Defiesta-Ng
Sr. Director, Regulatory Affairs Consulting
Veranex, Inc.
5420 Wade Park Blvd., Suite 204
Raleigh, North Carolina 27607

Re: DEN240021
Trade/Device Name: Tango® Belt
Regulation Number: 21 CFR 890.3780
Regulation Name: Wearable fall injury prevention device
Regulatory Class: Class II
Product Code: SEC
Dated: May 15, 2024
Received: May 16, 2024

Dear Valerie Defiesta-Ng:

The Center for Devices and Radiological Health (CDRH) of the Food and Drug Administration (FDA) has completed its review of your De Novo request for classification of the Tango® Belt, a prescription device under 21 CFR Part 801.109 with the following indications for use:

> The Tango® Belt is indicated as an adjunctive to standard-of-care to reduce the risk of hip fracture or hip dislocation due to falls in older adults at risk of major hip injury due to falls.
> It is for prescription use only.

FDA concludes that this device should be classified into Class II. This order, therefore, classifies the Tango® Belt, and substantially equivalent devices of this generic type, into Class II under the generic name wearable fall injury prevention device.

FDA identifies this generic type of device as:

> **Wearable fall injury prevention device**. A wearable fall injury prevention device is intended to detect falls and prevent major fall injuries. Once a fall is detected, the device deploys a protective mechanism to reduce the risk of injury.

Section 513(f)(2) of the Food, Drug and Cosmetic Act (the FD&C Act) was amended by section 607 of the Food and Drug Administration Safety and Innovation Act (FDASIA) on July 9, 2012. This law provides two

options for De Novo classification. First, any person who receives a "not substantially equivalent" (NSE) determination in response to a 510(k) for a device that has not been previously classified under the Act may request FDA to make a risk-based classification of the device under section 513(a)(1) of the Act. On December 13, 2016, the 21st Century Cures Act removed a requirement that a De Novo request be submitted within 30 days of receiving an NSE determination. Alternatively, any person who determines that there is no legally marketed device upon which to base a determination of substantial equivalence may request FDA to make a risk-based classification of the device under section 513(a)(1) of the Act without first submitting a 510(k). FDA shall, within 120 days of receiving such a request, classify the device. This classification shall be the initial classification of the device. Within 30 days after the issuance of an order classifying the device, FDA must publish a notice in the Federal Register announcing the classification.

On May 16, 2024, FDA received your De Novo requesting classification of the Tango® Belt. The request was submitted under section 513(f)(2) of the FD&C Act. In order to classify the Tango® Belt into class I or II, it is necessary that the proposed class have sufficient regulatory controls to provide reasonable assurance of the safety and effectiveness of the device for its intended use. After review of the information submitted in the De Novo request, FDA has determined that, for the previously stated indications for use, the Tango® Belt can be classified in class II with the establishment of special controls for class II. FDA believes that class II (special) controls provide reasonable assurance of the safety and effectiveness of the device type. The identified risks and mitigation measures associated with the device type are summarized in the following table:

Risks to Health	**Mitigation Measures**
Pain or discomfort due to improper fitting of wearable components	Non-clinical performance testing Labeling
Ineffective prevention of injuries during falls	Non-clinical performance testing Software verification, validation, and hazard analysis Electromagnetic compatibility (EMC) testing
Injury from device deployment outside of falls	Non-clinical performance testing Software verification, validation, and hazard analysis Electromagnetic compatibility (EMC) testing Labeling
Adverse tissue reaction	Biocompatibility evaluation
Injury from electrical hazards	Electromagnetic compatibility (EMC) testing Electrical safety testing Battery safety testing

In combination with the general controls of the FD&C Act, the wearable fall injury prevention device is subject to the following special controls:

(1) Non-clinical performance testing must demonstrate that the device performs as intended under anticipated conditions of use. The following performance characteristics must be tested:
    (i) Deployment of protection measures in the case of a fall;
    (ii) Deployment rate when a fall is not occurring; and
    (iii)Device durability.
(2) Software verification, validation, and hazard analysis must be performed.

(3) Performance testing must demonstrate the electromagnetic compatibility (EMC), electrical safety, and battery performance and safety of the device.
(4) The patient-contacting components of the device must be demonstrated to be biocompatible.
(5) Labeling for the user must include:
    (i) Instructions on fitting the device to the user;
    (ii) Information on how the device operates and the typical sensations experienced during use; and
    (iii) Cleaning instructions.

In addition, this is a prescription device and must comply with 21 CFR 801.109.

Although this letter refers to your product as a device, please be aware that some granted products may instead be combination products. If you have questions on whether your product is a combination product, contact CDRHProductJurisdiction@fda.hhs.gov.

Section 510(m) of the FD&C Act provides that FDA may exempt a class II device from the premarket notification requirements under section 510(k) of the FD&C Act, if FDA determines that premarket notification is not necessary to provide reasonable assurance of the safety and effectiveness of the device type. FDA has determined premarket notification is necessary to provide reasonable assurance of the safety and effectiveness of the device type and, therefore, the device is not exempt from the premarket notification requirements of the FD&C Act. Thus, persons who intend to market this device type must submit a premarket notification containing information on the wearable fall injury prevention device they intend to market prior to marketing the device.

Please be advised that FDA's decision to grant this De Novo request does not mean that FDA has made a determination that your device complies with other requirements of the FD&C Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the FD&C 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) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and if applicable, the electronic product radiation control provisions (Sections 531-542 of the FD&C Act; 21 CFR 1000-1050).

All medical devices, including Class I and unclassified devices and combination product device constituent parts are required to be in compliance with the final Unique Device Identification System Rule ("UDI Rule"). The UDI Rule requires, among other things, that a device bear a unique device identifier (UDI) on its label and package (21 CFR 801.20(a)) unless an exception or alternative applies (21 CFR 801.20(b)) and that the dates on the device label be formatted in accordance with 21 CFR 801.18. The UDI Rule (21 CFR 830.300(a) and 830.320(b)) also requires that certain information be submitted to the Global Unique Device Identification Database (GUDID) (21 CFR Part 830 Subpart E). For additional information on these requirements, please see the UDI System webpage at https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/unique-device-identification-system-udi-system.

A notice announcing this classification order will be published in the Federal Register. A copy of this order and supporting documentation are on file in the Dockets Management Branch (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Room 1061, Rockville, MD 20852 and are available for inspection between 9 a.m. and 4 p.m., Monday through Friday.

As a result of this order, you may immediately market your device as described in the De Novo request, subject to the general control provisions of the FD&C Act and the special controls identified in this order.

For comprehensive regulatory information about medical devices and radiation-emitting products, please see Device Advice (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance) and CDRH Learn (https://www.fda.gov/training-and-continuing-education/cdrh-learn). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

If you have any questions concerning the contents of the letter, please contact Michael Raucher at michael.raucher@fda.hhs.gov.

Sincerely,

David P. Mc Mullen -S Digitally signed by David P. Mc Mullen -S
Date: 2025.04.09 16:11:07 -04'00'

David P. McMullen, MD
Director
OHT5: Office of Neurological and
Physical Medicine Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health