

July 26, 2024

Tandem Diabetes Care, Inc.
Jordan Barkhimer
Senior Regulatory Affairs Specialist
12400 High Bluff Dr.
San Diego, California 92130

Re: K241078

Trade/Device Name: Tandem Mobi Insulin Pump with interoperable technology
Regulation Number: 21 CFR 880.5730
Regulation Name: Alternate controller enabled infusion pump
Regulatory Class: Class II
Product Code: QFG
Dated: April 18, 2024
Received: April 19, 2024

Dear Jordan Barkhimer:

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 (the 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. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database available at <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm> identifies combination product submissions. 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.

Additional information about changes that may require a new premarket notification are provided in the FDA guidance documents entitled "Deciding When to Submit a 510(k) for a Change to an Existing Device" (<https://www.fda.gov/media/99812/download>) and "Deciding When to Submit a 510(k) for a Software Change to an Existing Device" (<https://www.fda.gov/media/99785/download>).

Your device is also subject to, among other requirements, the Quality System (QS) regulation (21 CFR Part 820), which includes, but is not limited to, 21 CFR 820.30, Design controls; 21 CFR 820.90, Nonconforming product; and 21 CFR 820.100, Corrective and preventive action. Please note that regardless of whether a change requires premarket review, the QS regulation requires device manufacturers to review and approve changes to device design and production (21 CFR 820.30 and 21 CFR 820.70) and document changes and approvals in the device master record (21 CFR 820.181).

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 and Part 809); medical device reporting (reporting of medical device-related adverse events) (21 CFR Part 803) for devices or postmarketing safety reporting (21 CFR Part 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 Part 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR Parts 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, 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).

Sincerely,

Joshua Balsam -S

Joshua M. Balsam, Ph.D.

Branch Chief

Division of Chemistry

and Toxicology Devices

OHT7: Office of In Vitro Diagnostics

Office of Product Evaluation and Quality

Center for Devices and Radiological Health

Enclosure

Indications for Use

Submission Number (if known)

K241078

Device Name

Tandem Mobi Insulin Pump with interoperable technology

Indications for Use (Describe)

The Tandem Mobi insulin pump with interoperable technology (the pump) is intended for the subcutaneous delivery of insulin, at set and variable rates, for the management of diabetes mellitus in persons requiring insulin. The pump is able to reliably and securely communicate with compatible, digitally connected devices, including automated insulin dosing software, to receive, execute, and confirm commands from these devices.

The pump is intended for single patient, home use and requires a prescription.

The pump is indicated for use in individuals 2 years of age and greater.

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)

CONTINUE ON A SEPARATE PAGE IF NEEDED.

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510(k) SUMMARY

Company	Tandem Diabetes Care, Inc 12400 High Bluff Drive San Diego, CA 92130
Prepared	18 April 2024
Contact	Jordan Barkhimer Sr. Regulatory Affairs Specialist +1 (858) 2246146 jbarkhimer@tandemdiabetes.com
Trade Name	Tandem Mobi insulin pump with interoperable technology
Common Name	Ambulatory Insulin Pump
Classification Product Code	QFG
Classification Name	Alternate Controller Enabled Infusion Pump
Regulation Number	21 CFR 880.5730
Device Class	Class II
Predicate Device	K240309, Tandem Mobi Insulin Pump with interoperable technology

I. Device Under Review

The Subject Device, Tandem Mobi insulin pump with interoperable technology (“Mobi pump”, “the pump”), is an Alternate Controller Enabled (ACE) Infusion Pump intended for the infusion of insulin into a patient requiring insulin therapy. The Tandem Mobi insulin pump with interoperable technology (“pump”) is screenless and includes visual LED, sound, and vibratory indicators to alert the user of the pump status. The Tandem Mobi insulin pump with interoperable technology system also includes: the Tandem Mobi Mobile Application and a 2mL (200 insulin unit) Tandem Mobi cartridge and a compatible FDA cleared infusion set. The Tandem Mobi Mobile Application (“Mobile app”) displays all information from, and is the primary controller of, the pump. Through the Mobile app, users will program all aspects of basal and bolus insulin delivery therapy including managing personal profiles, viewing pump and CGM data, and actively acknowledging all pump and mobile app alerts, alarms, reminders, notifications, and messages. The Tandem Mobi Mobile Application will also be used to transmit historical pump and mobile app therapy data to the Tandem Cloud. The Tandem Mobi Mobile Application will be made available via the Apple® App Store for iOS compatible smartphones based on completed device verification and validation. The Tandem Mobi cartridge is a disposable insulin cartridge compatible only with the Tandem Mobi pump.

The Tandem Mobi ACE pump can be used for basal and bolus insulin delivery with or without a CGM or with any compatible interoperable automated dosing algorithm.

The pump may be used in combination with a compatible continuous glucose monitor (CGM) system. Use of CGM is optional.

II. Intended Use/ Indications for Use

The Tandem Mob Insulin Pump with interoperable technology (the pump) is intended for the subcutaneous delivery of insulin, at set and variable rates, for the management of diabetes mellitus in persons requiring insulin. The pump is able to reliably and securely communicate with compatible, digitally connected devices, including automated insulin dosing software, to receive, execute, and confirm commands from these devices.

The pump is intended for single patient, home use and requires a prescription.

The pump is indicated for use in individuals 2 years of age and greater.

III. Technological Characteristics Compared to Predicate Device K240309

	Predicate Device K240309	Subject Device
Indications for Use/ Intended Use	The Tandem Mobi Insulin Pump with interoperable technology (the pump) is intended for the subcutaneous delivery of insulin, at set and variable rates, for the management of diabetes mellitus in persons requiring insulin. The pump is able to reliably and securely communicate with compatible, digitally connected devices, including automated insulin dosing software, to receive, execute, and confirm commands from these devices. The pump is intended for single patient, home use and requires a prescription. The pump is indicated for use in individuals 2 years of age and greater.	SAME
Prescription Use	Prescription is required.	SAME
Insulin Type	NovoLog or Humalog U-100 insulin	SAME
Infusion Set Type	Compatible, FDA cleared infusions sets with t:lock connectors manufactured for Tandem Diabetes Care.	SAME
Pump Type	An Alternate Controller Enabled Infusion Pump (21 CFR 880.5730)	SAME
Compatible Interoperable Devices	Compatible with: DEN170088: Dexcom G6 Continuous Glucose Monitoring System or other compatible iCGM	SAME

	Predicate Device K240309	Subject Device
	K200467: Control-IQ technology	
Communication with Compatible Interoperable Devices	Bluetooth Low Energy (BLE)	SAME
Principles of Operation	Delivery of Insulin (Bolus and Basal) programmed by patient based on health care provider recommendations.	SAME
Pump Technological Characteristics	The Device is an ambulatory, battery operated, rate-programmable infusion pump designed for the subcutaneous delivery of insulin, at set and variable rates, for the management of diabetes mellitus in persons requiring insulin. The device includes a disposable cartridge which is motor driven to deliver patient programmed basal rates and boluses through an infusion set into subcutaneous tissue.	SAME
Alarm Type	Visual, audible, and vibratory	SAME
Bolus Calculator	The Device contains a built-in bolus calculator	SAME
Bolus and Basal Insulin Control	Yes	SAME
Display of Primary Glucose and Therapy Information	The Device can display Glucose and Therapy information and trends from the pump and compatible interoperable devices. The pump does not include a graphical user interface. Instead, Primary Glucose and Therapy information and trends from the pump and compatible interoperable devices are displayed in the Tandem Mobi Mobile Application.	SAME
Use of Mobile Application	The Tandem Mobi Mobile App is not optional and has the following functions: - View pump therapy data, trends, alerts, alarms, and notifications. - Program Correction Boluses, Bolus Override, and Food (Standard) Boluses. - Terminate (Cancel or Stop) all bolus types regardless of origin of bolus request being made on the Tandem Mobi Insulin Pump or the Tandem Mobi Mobile App.	SAME

	Predicate Device K240309	Subject Device
	• Update historical pump data to Tandem Cloud • The Tandem Mobi Mobile App when paired with Tandem Mobi Insulin Pump and iOS compatible smartphone, will be able to control all aspects of pump therapy.	
Sterilization	The pump is provided non-sterile. The cartridge is provided sterile via Ethylene Oxide Gas to a Sterility Assurance Level (SAL) 10^{-6}.	DIFFERENT The pump is provided non-sterile. The cartridge is provided sterile via Irradiation to a Sterility Assurance Level (SAL) 10^{-6}.
Cartridge Length of Use	Every 3 days for compatible insulins.	SAME

IV. Overview of Non-Clinical Performance Tests

Appropriate testing was performed to confirm the Subject Device met specified requirements and performed as intended. See summaries below.

Usability/Human Factors:

No new Human Factors testing was performed to support this 510(k) Notification.

Software Verification and Validation:

No new Software testing was performed to support this 510(k) Notification.

Electrical Safety/ EMC:

No new Electrical and Electromagnetic Compatibility (EMC) was performed to support this 510(k) Notification.

Insulin Compatibility and Biocompatibility:

Insulin compatibility and biocompatibility testing was performed to support this 510(k) Notification. The outcome of the insulin compatibility and biocompatibility testing demonstrates that the Subject Device is as safe and as effective as the Predicate Device.

Sterilization and Shipping:

Testing for the new sterilization method (E-Beam Irradiation) for the Tandem Mobi insulin cartridge and shipping integrity of the system was performed to support this 510(k) Notification. The outcome of the insulin compatibility and biocompatibility testing demonstrates that the Subject Device is as safe and as effective as the Predicate Device.

Special Controls:

Evaluation and adherence to the Special Controls of the Predicate Device (K240309) demonstrates continued assurance of the safety and effectiveness of the Subject Device.

Clinical Testing:

No new clinical testing was provided to support this 510(k) Notification.

Conclusion:

The Subject Device serves the same function as the Predicate Device. Furthermore, the Subject Device performs insulin therapy functions that are the same as that of the Predicate Device. The required technical documentation provided in this 510(k) demonstrates the Subject Device is as safe and as effective as the Predicate Device. Therefore, the Subject Device has been evaluated to be substantially equivalent to the Predicate Device and does not raise new or different questions of safety or effectiveness.