



September 4, 2025

Careverse Technology Pte. Ltd.  
Huiyu Shi  
Regulatory Affairs Specialist  
987 Serangoon Road  
Singapore, 328147  
Singapore

Re: K251656

Trade/Device Name: Careverse CoronaryDoc (Careverse CoronaryDoc)  
Regulation Number: 21 CFR 892.2050  
Regulation Name: Medical Image Management and Processing System  
Regulatory Class: Class II  
Product Code: QIH  
Dated: July 30, 2025  
Received: July 30, 2025

Dear Huiyu Shi:

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); 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.

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>.

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](mailto:DICE@fda.hhs.gov)) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

 for

Jessica Lamb, PhD  
Assistant Director  
Imaging Software Team  
DHT8B: Division of Radiological Imaging  
Devices and Electronic Products  
OHT8: Office of Radiological Health  
Office of Product Evaluation and Quality  
Center for Devices and Radiological Health

Enclosure

## Indications for Use

Please type in the marketing application/submission number, if it is known. This textbox will be left blank for original applications/submissions.

K251656

?

Please provide the device trade name(s).

?

Careverse CoronaryDoc (Careverse CoronaryDoc)

Please provide your Indications for Use below.

?

Careverse CoronaryDoc is a web-based software application that is intended to be used by trained medical professionals as an interactive tool for viewing and analyzing cardiac computed tomography (CT) data for determining the presence and extent of coronary plaques (i.e., atherosclerosis) and stenosis in patients who underwent Coronary Computed Tomography Angiography (CCTA) for evaluation of CAD or suspected CAD. This software post processes CT images obtained using any Computed Tomography (CT) scanner. The software provides tools for the measurement and visualization of coronary arteries. The software is not intended to replace the skill and judgment of a qualified medical practitioner and should only be used by people who have been appropriately trained in the software's functions, capabilities and limitations.

Please select the types of uses (select one or both, as applicable).

- ☒ Prescription Use (Part 21 CFR 801 Subpart D)  
☐ Over-The-Counter Use (21 CFR 801 Subpart C)

?

K251656

## **510(k) Summary**

### 1. Submitter

#### **510(k) Submitter**

Submitter Name: Careverse Technology Pte. Ltd.

Address: 987 Serangoon Road, Singapore 328147.

#### **Correspondent**

Primary Correspondent: Huiyu Shi.

Title: Regulatory Affairs Specialist.

Email: [huiyushi@careverse.com](mailto:huiyushi@careverse.com)

Second Correspondent: Jianfu Wang.

Title: Director of Regulatory Affairs and Quality.

Email: [jianfuwang@careverse.com](mailto:jianfuwang@careverse.com)

**Date Prepared:** 07/29/2025

### 2. Device

#### **Device Type**

Trade Name: Careverse CoronaryDoc (Careverse CoronaryDoc)

Model: Careverse CoronaryDoc.

Common Name: Picture Archiving and Communications System.

#### **Classification**

Regulation Number: 21 CFR 892.2050

Regulation Name: Medical image management and processing system

Regulatory Class: Class II

Panel: Radiology

Product Code: QIH

### 3. Predicate Device

510 (k) number: K202280;

Trade name: Cleerly Labs v2.0;

510(k) submitter/holder: Cleerly, Inc.

Regulation Number: 21 CFR 892.2050

Regulation Name: Picture archiving and communications system

Regulatory Class: Class II

Product Code: LLZ

### 4. Device Description

Careverse CoronaryDoc is a B/S architecture and is suitable for DICOM medical image viewing, 3D reconstruction and post-processing and stenosis and plaque analysis. Based on the axial image data of coronary computed tomography angiography (CCTA), Careverse CoronaryDoc automatically extracts the coronary region, detects suspected stenosis lesions in this area, and further performs automatic plaque analysis. At the same time, the software can also automatically detect stents and bridges. Users can modify the degree of stenosis, plaque type, stent, and bridge tips to form a structured report to assist physicians in diagnosing coronary heart disease.

The module functions include user login, image list, vascular segmentation and reconstruction, coronary branch naming, coronary stenosis, plaque, stent, myocardial bridge analysis, plaque detailed analysis, editing segmentation, editing blood vessels, editing naming, image operation tools, structured reports, push printing, management configuration, platform management, and transmission queues.

### 5. Indications for Use

Careverse CoronaryDoc is a web-based software application that is intended to be used by trained medical professionals as an interactive tool for viewing and analyzing cardiac computed tomography (CT) data for determining the presence and extent of coronary plaques (i.e., atherosclerosis) and stenosis in patients who underwent Coronary Computed Tomography Angiography (CCTA) for evaluation of CAD or suspected CAD. This software post processes CT images obtained using any Computed Tomography (CT) scanner. The software provides tools for the measurement and visualization of coronary arteries.

The software is not intended to replace the skill and judgment of a qualified medical practitioner and should only be used by people who have been appropriately trained in the software's functions, capabilities and limitations.

6. Comparison of Technological Characteristic with the Predicate Device

| Item                             | Subject device, K251656                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Predicate device (K202280)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Analysis |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| Product Code                     | QIH                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | LLZ                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Same     |
| Regulation                       | 21 CFR 892.2050                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 21 CFR 892.2050                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Same     |
| Intended Use/Indications for Use | <p>Careverse CoronaryDoc is a web-based software application that is intended to be used by trained medical professionals as an interactive tool for viewing and analyzing cardiac computed tomography (CT) data for determining the presence and extent of coronary plaques (i.e., atherosclerosis) and stenosis in patients who underwent Coronary Computed Tomography Angiography (CCTA) for evaluation of CAD or suspected CAD. This software post processes CT images obtained using any Computed Tomography (CT) scanner. The software provides tools for the measurement and visualization of coronary arteries.</p> <p>The software is not intended to replace the skill and judgment of a qualified medical practitioner and should only be used by people who have been appropriately trained in the</p> | <p>Cleerly Labs is a web-based software application that is intended to be used by trained medical professionals as an interactive tool for viewing and analyzing cardiac computed tomography (CT) data for determining the presence and extent of coronary plaques (i.e., atherosclerosis) and stenosis in patients who underwent Coronary Computed Tomography Angiography (CCTA) for evaluation of CAD or suspected CAD. This software post processes CT images obtained using any Computed Tomography (CT) scanner. The software provides tools for the measurement and visualization of coronary arteries.</p> <p>The software is not intended to replace the skill and judgment of a qualified medical practitioner and should only be used by people who have been appropriately trained in the</p> | Same     |

|                                               |                                                     |                                                                                                                                                                                                                                                                                                                                                                         |      |
|-----------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
|                                               | software's functions, capabilities and limitations. | software's functions, capabilities and limitations. Users should be aware that certain views make use of interpolated data. This is data that is created by the software based on the original data set. Interpolated data may give the appearance of healthy tissue in situations where pathology that is near or smaller than the scanning resolution may be present. |      |
| Image Input                                   | DICOM 3.0 Compliant                                 | DICOM 3.0 Compliant                                                                                                                                                                                                                                                                                                                                                     | Same |
| Image Acquisition                             | CT Images                                           | CT Images                                                                                                                                                                                                                                                                                                                                                               | Same |
| Study Analysis Tools – Navigation             | Yes                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                     | Same |
| Study Analysis Tools – Editing/ Visualization | Yes                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                     | Same |
| 2D Imaging                                    | Yes                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                     | Same |
| 3D Imaging                                    | Yes                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                     | Same |
| Multiplanar Reformat (MPR)                    | Yes                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                     | Same |
| Segmentation of Region of Interest            | Yes                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                     | Same |
| Plaque Composition Overlay                    | Yes                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                     | Same |
| Hounsfield Unit (HU)                          | Yes                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                     | Same |
| Distance Measurements                         | Yes                                                 | Yes                                                                                                                                                                                                                                                                                                                                                                     | Same |

|                              |     |     |      |
|------------------------------|-----|-----|------|
| Volumetric Measurements      | Yes | Yes | Same |
| Stenosis                     | Yes | Yes | Same |
| Coronary Anatomical Findings | Yes | Yes | Same |
| Coronary Report              | Yes | Yes | Same |

## 7. Performance Data

Software verification and validation activities were performed. During product development, potential hazards were controlled by a risk management plan including activities of risk analysis, risk mitigation, verification and risk-benefit analysis. Verification and validation demonstrated that the device meets all of its specification.

Besides, the performance of the software was compared to ground truth results produced by US expert readers. The results are summarized as the following.

For the segmentation performance, both Dice Coefficient and 95% Hausdorff Distance have met the acceptable criteria. The value of Dice Coefficient is 0.899, which is higher than the acceptable criteria 0.842. The value of 95% Hausdorff Distance is 4.366, which is less than 6.46.

For the labeling performance, the accuracy on case level is 93.10%, the accuracy on vessel level is 98.21%. Results have met the acceptable criteria.

For the stenosis performance, the results are shown in Table 1.

**Table 1: Stenosis Performance**

| Stenosis Grade     | n   | m   | Agreement | Lower 95% CI | Higher 95% CI |
|--------------------|-----|-----|-----------|--------------|---------------|
| non-stenosis       | 682 | 675 | 98.97%    | 97.90%       | 99.59%        |
| minor stenosis     | 160 | 146 | 91.25%    | 85.75%       | 95.13%        |
| minimal stenosis   | 100 | 87  | 87.00%    | 78.80%       | 92.89%        |
| moderate stenosis  | 94  | 82  | 87.23%    | 78.76%       | 93.23%        |
| severe stenosis    | 86  | 72  | 83.72%    | 74.20%       | 90.80%        |
| complete occlusion | 34  | 31  | 91.18%    | 76.32%       | 98.14%        |

Notes:

- n: Total number of measurements for that stenosis grade.
- m: Number of measurements where the predicted stenosis grade exactly matched the labeled stenosis grade.

- Agreement: The percentage of measurements in agreement.
- Lower 95% CI: The lower limit of the 95% confidence interval for the agreement percentage.
- Higher 95% CI: The higher limit of the 95% confidence interval for the agreement percentage.

For the plaque performance, the results are shown in Table 2.

**Table 2: Plaque Performance**

| Output                      | Pearson Correlation Coefficient | Bland-Altman Agreement |
|-----------------------------|---------------------------------|------------------------|
| vessel volume               | 98.42%                          | 95.18%                 |
| lumen volume                | 98.52%                          | 94.78%                 |
| total plaque volume         | 96.94%                          | 95.91%                 |
| calcified plaque volume     | 97.92%                          | 98.00%                 |
| non-calcified plaque volume | 95.14%                          | 95.24%                 |
| low-density non-calcified   | 88.42%                          | 94.96%                 |

## 8. Standards and Guidance

- ISO 14971:2019 "Medical devices – Application of risk management to medical devices".
- ISO/TR 24971:2020 "Medical Device Software GB/T42062 Application Guide".
- ISO 13485:2016 "Medical devices – Quality management systems – Requirements for use in regulations".
- IEC 62304:2015
- GB/T 25000.51-2016 "Systems and software engineering - Quality requirements and evaluation of systems and software (SQuaRE) Part 51: Quality requirements and test rules for ready-to-use software products (RUSP).
- General Principles of Software Validation; Final Guidance for Industry and FDA Staff, CDRH and FDA, Jan.11, 2012
- Guiding Principles for Cybersecurity Registration Review of Medical Devices (2022)
- Guidelines for On-site Inspection of Independent Software in Good Manufacturing Practice for Medical Devices (2020)

## 9. Conclusion

The proposed device is as safe and effective as the predicate device (K202280). The proposed device has the same intended uses and technological characteristics as its predicate device. Thus, Careverse CoronaryDoc is substantially equivalent.