K063024

OCT 3 0 2006

510(k) Summary of Safety and Effectiveness

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

Introduction

According to the requirements of 21 CFR 807.92, the following information provides sufficient detail to understand the basis for a determination of substantial equivalence.

Submitter name, Address, and Contact

Lin-Zhi International, Inc. 687 North Pastoria Avenue Sunnyvale, CA 94085 Phone: (408) 732-3856

Fax: (408) 732-3849 Email: mtlin@lin-zhi.com

Contact:

Marie Lin, Ph.D.

President, R&D Director

Device Name and Classification

Classification Name:

The Amphetamine test systems have been placed in Class

II by the Bureau of Medical Devices.

Classification Number: DKZ (21 CFR 862.3100)

Panel: 91Toxicology

The "Drug Specific, Calibrators" has been placed in

Class II by the Bureau of Medical Devices. Classification No.: DLJ, 21 CFR 862.3200

Panel: 91Toxicology

The "Single (Specified) Analyte Controls" has been placed

in Class I by the Bureau of Medical Devices. Classification No.: LAS, 21 CFR 862.3280

Panel: 91Toxicology

Common Name:

Oral Fluid Amphetamine Homogeneous Enzyme

Immunoassays

Proprietary Name:

Legally Marketed Predicate Device(s)

The LZI Oral Fluid Amphetamine-Specific Enzyme Immunoassay is substantially equivalent to the Amphetamine-Specific Intercept® Micro-plate EIA (K992918) manufactured by OraSure Technologies Inc. (formerly known as STC Technologies, Inc) for its general intended use. The current subject device is also substantially equivalent to other LZI test systems cleared by FDA, e.g., the Oral Fluid Cocaine (K050945), Opiate (K050988), and Methadone (K051058) Homogeneous Enzyme Immunoassay for its stated intended use.

Device Description

LZI's Oral Fluid Amphetamine-Specific Enzyme Immunoassay is a ready-to-use, liquid reagent, homogeneous enzyme immunoassay. The assay uses specific antibodies that can detect amphetamine in oral fluid with minimal cross-reactivity to various, common prescription drugs and abused drugs. The assay is based on competition between drug labeled with glucose-6-phosphate dehydrogenase (G6PDH) enzyme and free drug from the saliva sample for a fixed amount of specific antibody. In the absence of free drug from the saliva sample the specific antibody binds to the drug labeled G6PDH enzyme causing a decrease in enzyme activity. It is therefore the drug concentration is proportional to the enzyme activity. The G6PDH enzyme activity is determined spectrophotometrically at 340 nm by measuring its ability to covert nicotinamide adenine dinucleotide (NAD) to NADH.

Intended Use

The Amphetamine-Specific Enzyme Immunoassays for Drugs of Abuse in Oral Fluid is a homogeneous enzyme immunoassay system to detect amphetamine in human saliva with a cutoff of 45 ng/mL when testing oral fluid specimen collected with Salivette collector (manufactured by Sarstedt) and diluted with 1 mL of buffer. The calibrators and controls of the analyte (d-amphetamine) are prepared with oral fluid buffer so that it can be used to verify and validate the assay. The assay is intended for use in the qualitative determination for amphetamine. The assay is designed for professional use with a number of automated clinical chemistry analyzers.

The Oral Fluid Amphetamine-Specific Enzyme Immunoassay is a homogeneous enzyme immunoassay system provides only a preliminary analytical test result. A more specific alternative chemical method must be used to obtain a confirmed analytical result. Gas chromatography/mass spectrometry (GC/MS) is the preferred confirmatory method. Clinical consideration and professional judgment should be applied to any drug-of-abuse test result, particularly when preliminary positive results are used.

Comparison to Predicate Device(s)

The LZI Oral Fluid Amphetamine-Specific Homogeneous Enzyme Immunoassay, including calibrators and controls, is substantially equivalent to OraSure's Amphetamine-Specific Intercept® Micro-plate EIA in its intended use and in for the qualitative determination of amphetamine in human oral fluid.

Device	Subject Device	Predicate Device
Characteristics	(LZI Oral Fluid Amphetamine-Specific	(OraSure Amphetamine-Specific
	Homogeneous EIA)	
Intended Use	Homogeneous EIA) The Amphetamine-Specific Enzyme Immunoassays for Drugs of Abuse in Oral Fluid is a homogeneous enzyme immunoassay system to detect amphetamine in human saliva with a cutoff of 45 ng/mL when testing oral fluid specimen collected with Salivette collector (manufactured by Sarstedt) and diluted with 1 mL of buffer. The calibrators and controls of the analyte (d-amphetamine) are prepared with oral fluid buffer so that it can be used to verify and validate the assay. The assay is intended for use in the qualitative determination for amphetamine. The assay is designed for professional use with a number of automated clinical chemistry analyzers. The Oral Fluid Amphetamine-Specific Enzyme Immunoassay is a homogeneous enzyme immunoassay system provides only a preliminary analytical test result. A more specific alternative chemical method must be used to obtain a confirmed analytical result. Gas chromatography/mass spectrometry (GC/MS) is the preferred confirmatory method. Clinical consideration and professional judgment should be applied to any drug-of-abuse test result, particularly when preliminary positive results are used.	Intercept® Micro-plate EIA) The OraSure Amphetamine-Specific Intercept® Micro-plate EIA is intended for use by clinical laboratories in the qualitative determination of amphetamine in oral fluid collected with the Intercept® DOA Oral Specimen Collection Device using a 100 ng/mL cutoff. For In Vitro Diagnostic Use. The OraSure Amphetamine-Specific Intercept® Micro-plate EIA provides only a preliminary analytical test result. A more specific alternative chemical method should be used in order to obtain a confirmed analytical result. Gas chromatography/mass spectrometry (GC/MS) is the preferred confirmatory method. Clinical consideration and professional judgement should be applied to any drugs of abuse test result, particularly when a preliminary, positive result is observed.
Analyte	d-amphetamine	d-amphetamine
Matrix	Saliva	Saliva
Calibrators/	5 levels including a negative	4 levels including a negative
Controls Level		

The LZI Oral Fluid Amphetamine-Specific Homogeneous Enzyme Immunoassay, including calibrators and controls, is also substantially equivalent to other LZI test systems cleared by FDA, e.g., the Oral Fluid Cocaine (K050945), Opiate (K050988), and Methadone (K051058) Homogeneous Enzyme Immunoassay for its stated intended use.

Device	Predicate Device	Predicate Device	Predicate Device
Characteristics	(K050945)	(K050988)	(K051058)
Intended Use	The LZI Cocaine Metabolite	The LZI Opiate Oral	The LZI Methadone Oral
	(Benzoylecgonine) Oral	Fluid Homogeneous EIA	Fluid Homogeneous EIA
	Fluid Homogeneous EIA is a	is a homogeneous	is a homogeneous enzyme
	homogeneous enzyme	enzyme immunoassay	immunoassay system to
	immunoassay system to	system to detect opiates	detect methadone in
	detect cocaine metabolite in	in human saliva with a	human saliva with a
	human saliva with a cutoff of	cutoff of 30 ng/mL when	cutoff of 30 ng/mL when
	15 ng/mL when testing oral fluid specimen collected with	testing oral fluid specimen collected with	testing oral fluid specimen collected with
	Salivette collector	Salivette collector	Salivette collector
	(manufactured by Sarstedt)	(manufactured by	(manufactured by
	and diluted with 1 mL of	Sarstedt) and diluted	Sarstedt) and diluted with
	buffer. The calibrators and	with 1 mL of buffer. The	1 mL of buffer. The
	controls of the analyte	calibrators and controls	calibrators and controls of
	(Benzoylecgonine) are	of the analyte (Opiate)	the analyte (Methadone)
	prepared with oral fluid	are prepared with oral	are prepared with oral
	buffer so that it can be used	fluid buffer so that it can	fluid buffer so that it can
	to verify and validate the	be used to verify and	be used to verify and
	assay. The assay is intended	validate the assay. The	validate the assay. The
	for use in the qualitative	assay is intended for use	assay is intended for use
	determination for cocaine/cocaine metabolite	in the qualitative	in the qualitative
		determination for Opiate	determination for
	drugs.	drugs.	Methadone drugs.
	The Cocaine Metabolite	The Opiate Oral Fluid	The Methadone Oral Fluid
	(Benzoylecgonine) Oral Fluid	Enzyme Immunoassay is a	Enzyme Immunoassay is a
	Enzyme Immunoassay is a	homogeneous enzyme	homogeneous enzyme
	homogeneous enzyme immunoassay system provides only a preliminary	immunoassay system provides only a preliminary analytical	immunoassay system provides only a preliminary analytical
	analytical test result. A more	test result. A more specific	test result. A more specific
	specific alternative chemical method must be used to obtain a	alternative chemical method	alternative chemical method
	confirmed analytical result. Gas	must be used to obtain a confirmed analytical result.	must be used to obtain a confirmed analytical result. Gas
	chromatography/mass spectrometry	Gas chromatography/mass	chromatography/mass
	(GC/MS) is the preferred	spectrometry (GC/MS) is the	spectrometry (GC/MS) is the
	confirmatory method. Clinical consideration and professional	preferred confirmatory method. Clinical	preferred confirmatory method. Clinical consideration and
	judgment should be applied to any	consideration and	professional judgement should
	drug-of-abuse test result, particularly when preliminary	professional judgement should	be applied to any drug-of-abuse
	particularly when preuminary positive results are used.	be applied to any drug-of- abuse test result, particularly	test result, particularly when preliminary positive results are
	-	when preliminary positive results are used.	used.
Analyte	Benzoylecgonine	Morphine	Methadone
Matrix	Saliva	Saliva	Saliva
Calibrators/	5 levels including a negative	5 levels including a	5 levels including a
Controls Level		negative	negative

Performance Characteristics

LZI Oral Fluid Amphetamine-Specific Assay

Feature	Oral Fluid Amphetamine-Specific EIA			
Qualitative : (n=120) mA/min		Mean.	SD	% CV
	Negative	250.9	1.58	0.63%
Within Run Precision:	15 ng/mL	284.6	1.60	0.56%
	30 ng/mL	297.9	1.46	0.49%
	45 ng/mL	309.6	1.44	0.46%
	90 ng/mL	331.2	1.67	0.50%
		Mean.	SD	% CV
Total Precision:	Negative	250.9	2.57	1.02 %
	15 ng/mL	284.6	2.43	0.85 %
	30 ng/mL	297.9	2.07	0.70 %
	45 ng/mL	309.6	2.15	0.70 %
	90 ng/mL	331.2	2.51	0.76 %
Accuracy: Clinical patients samples (n=) vs. GC/MS	97.1 % Agreement			
Specificity:	See attached Assay package insert			

OraSure Amphetamine-Specific Micro-Plate EIA

Feature	Amphetamine	Mean O.D.	% CV
Precision	0 ng/mL	1.905	3.9
Intra-assay	50 ng/mL	1.005	3.5
N=64	100 ng/mL	0.709	4.0
	150 ng/mL	0.563	4.5
	200 ng/mL	0.438	6.4
Inter-assay	0 ng/mL	1.905	6.7
N=4/day, 20 days	50 ng/mL	1.005	6.7
	100 ng/mL	0.709	7.5
	150 ng/mL	0.563	7.7
	200 ng/mL	0.438	7.9
Accuracy: Clinical patients sample (n=53) vs. GC/MS	89 % Agreement		
Specificity	See OraSure product insert		

Summary

The information provided in this pre-market notification demonstrates that the LZI Oral Fluid Amphetamine-Specific Homogeneous EIA is substantially equivalent to the legally marketed predicated device for its general intended use. Data and results provided in this premarket notification were collected and prepared in accordance with the NCCLS guidance. Substantial equivalence was demonstrated through comparison of intended use and physical properties to the commercially available predicate device as confirmed by gas chromatography/mass spectrometry, an independent analytical method. The information supplied in this pre-market notification provides reasonable assurance that the LZI Oral Fluid Amphetamine-Specific Homogeneous EIA is safe and effective for its stated intended use.

DEPARTMENT OF HEALTH & HUMAN SERVICES





Food and Drug Administration 2098 Gaither Road Rockville MD 20850

Marie Lin, Ph.D. President, R&D Director Lin-Zhi International, Inc. 687 North Pastoria Ave Sunnyvale, CA 94085

OCT 3 0 2006

Re: k063024

Trade/Device Name: Oral Fluid Amphetamine-Specific Enzyme

Immunoassay, Calibrators and Controls

Regulation Number: 21 CFR 862.3100 Regulation Name: Amphetamine test system

Regulatory Class: Class II Product Code: DKZ, DLJ, LAS Dated: September 27, 2006 Received: October 2, 2006

Dear Dr. Lin:

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.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in Title 21, Code of Federal Regulations (CFR), Parts 800 to 895. 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 Parts 801 and 809); and good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820).

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This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific information about the application of labeling requirements to your device, or questions on the promotion and advertising of your device, please contact the Office of In Vitro Diagnostic Device Evaluation and Safety at (240) 276-0484. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/industry/support/index.html.

Sincerely yours,

Alberto Gutierrez, Ph.D.

Director

Division of Chemistry and Toxicology Office of In Vitro Diagnostic Device

Evaluation and Safety

Center for Devices and Radiological Health

Enclosure

Premarket Notification

Indications for Use

510(k) Number (if known): 100	<u>03</u> 024	
	amine-Specific H	lomogeneous Enzyme Immunoassay,
Indications For Use:		
homogeneous enzyme immunoassa a cutoff of 45 ng/mL when testing (manufactured by Sarstedt) and dil of the analyte (d-amphetamine) are to verify and validate the assay. The	ay system to deter oral fluid specime tuted with 1 mL of prepared with one assay is intendent he assay is design	s for Drugs of Abuse in Oral Fluid is a sect amphetamine in human saliva with nen collected with Salivette collector of buffer. The calibrators and controls oral fluid buffer so that it can be used ed for use in the qualitative ned for professional use with a numbe
system provides only a preliminary analy	ytical test result. A l lytical result. Gas ch Tinical consideratio	
Prescription Use	AND/OR	Over-The-Counter Use
(Part 21 CFR 801 Subpart D)		(21 CFR 801 Subpart C)
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