



**SPECIAL 510(k) SUBSTANTIAL EQUIVALENCE DETERMINATION  
DECISION SUMMARY**

**I Background Information:**

**A 510(k) Number**

K201258

**B Applicant**

EPS Bio Technology Corp.

**C Proprietary and Established Names**

EASYMAX Tag Self-Monitoring Blood Glucose System

**D Regulatory Information**

Product Code(s)	Classification	Regulation Section	Panel
NBW	Class II	21 CFR 862.1345 - Glucose Test System	CH - Clinical Chemistry

**II Review Summary:**

This 510(k) submission contains information/data on modifications made to the submitter's own CLASS II device requiring 510(k). The following items are present and acceptable.

1. The name and 510(k) number of the SUBMITTER'S previously cleared device. EasyMax MU Self-Monitoring Blood Glucose System, K121207.
2. Submitter's statement that the **INDICATIONS FOR USE/INTENDED USE** of the modified device as described in its labeling **HAS NOT CHANGED** along with the proposed labeling which includes instructions for use, package labeling, and, if available, advertisements or promotional materials (labeling changes are permitted as long as they do not affect the intended use).
3. A description of the device **MODIFICATION(S)**, including clearly labeled diagrams, engineering drawings, photographs, user's and/or service manuals in sufficient detail to demonstrate that the **FUNDAMENTAL SCIENTIFIC TECHNOLOGY** of the modified device **has not changed. This change was for:**

- Change in the device name from EasyMax MU Self-Monitoring Blood Glucose System to EASYMAX Tag Self-Monitoring Blood Glucose System.
  - Meter buttons were changed from three front buttons to two front buttons, meter shell color changed from black to white and meter shape changed from oval to rectangular.
  - The test strip port was moved from the top to the bottom of the meter.
  - Removal of the strip ejection button.
  - Dimensions of the meter were changed from 94 x 50 x 19.5 (mm) to 74 x 47 x 12.4 (mm) and the meter weight without batteries changed from 39 g to 26 g.
  - The power source was changed from 2 AAA batteries to one CR2032 lithium battery.
  - The meter memory capacity was changed from 480 test results to 880 test results.
  - Change from the need for the user to manually tag a control solution test to the addition of a meter feature that automatically identifies control solutions.
  - Addition of user settable hypoglycemia and hyperglycemia indicators, before meal and after meal icons, and 7/14/30/90 days average calculations.
  - Near field communication (NFC) connectivity was added to the meter.
4. Comparison Information (i.e., similarities and differences) to the submitter's legally marketed predicate device including, labeling, intended use, and physical characteristics.
  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.
    - b) Based on the Risk Analysis, an identification of the verification and/or validation activities required, including methods or tests used and acceptance criteria to be applied.

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.

The device system is intended for single-patient use only. Disinfection efficacy studies were previously performed on the exterior meter materials (k121207) by an outside testing laboratory demonstrating complete inactivation of hepatitis B virus (HBV) with the chosen disinfectant PDI SANI-CLOTH® Germicidal disposable wipes (EPA Reg. No.: 9480-4). A robustness study was performed by the sponsor demonstrating that there was no change in performance or in external materials of the meter after 208 cleaning and disinfection cycles (with an additional 8552 cleaning wipes) to support 4 years of single-patient use. Labeling was reviewed for adequate instructions for the validated cleaning and disinfection procedures.