



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

**I Background Information:**

**A 510(k) Number**

K210234

**B Applicant**

Roche Molecular Systems, Inc.

**C Proprietary and Established Names**

cobas Influenza A/B & RSV Nucleic Acid Test for Use on the cobas Liat System

**D Regulatory Information**

Product Code(s)	Classification	Regulation Section	Panel
OCC	Class II	21 CFR 866.3980 - Respiratory Viral Panel Multiplex Nucleic Acid Assay	MI - Microbiology
OOI	Class II	21 CFR 862.2570 - Instrumentation for clinical multiplex test systems	CH - Clinical Chemistry
OZE	Class II	21 CFR 866.3980 - Respiratory viral panel multiplex nucleic acid assay	MI - Microbiology

**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.

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 and package labeling.
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 an adjustment to the baseline specification parameter range for influenza A and influenza B in order to prevent invalid results in cases of high-titer positive specimens.** This change has no effect on interpretation of results at low concentrations, including near the limit of detection. There is no change to the specifications for the RSV target. There is no change to the overall result interpretation logic of the algorithm.
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.