SPECIAL 510(k) SUBSTANTIAL EQUIVALENCE DETERMINATION
DECISION SUMMARY

I Background Information:

A 510(k) Number

K261293

B Applicant

EPS Bio Technology Corp.

C Proprietary and Established Names

EASYMAX® Voice Blood Glucose Monitoring 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: The EASYMAX® Tag Self-Monitoring Blood Glucose System, k201258.

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:**

a. Addition of a voice function that provides prompts to users to conduct testing, announces error messages etc.
b. Change in the number of meter buttons from 2 to 3.
c. Increased meter dimensions, increased weight, increased LCD display.
d. Update to LCD display icons to reflect new voice and 3-button navigation functions.
e. Change in meter case materials.
f. Change in power supply from a single CR2032 coin cell battery to two 1.5V AAA alkaline batteries.
g. Change in relative humidity operating condition claim from <90% RH to 20–85% RH.
h. Device system name changed from EASYMAX® Tag Self-Monitoring Blood Glucose System to EASYMAX® Voice Blood Glucose Monitoring System.

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 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 device.

The device system is intended for single-patient use only. Disinfection efficacy studies were performed on the external materials comprising the meter by an outside commercial testing laboratory demonstrating complete inactivation of hepatitis B virus (HBV) with the chosen disinfectant, PDI® Super SANI-CLOTH® Germicidal disposable wipe (EPA Reg. No.:9480-4). A robustness study was also previously performed by the sponsor demonstrating that there was no change in performance or in external materials of the meter after 10,950 cleaning and disinfection cycles to support 5 years of single-patient use. Labeling was reviewed for adequate instructions for the validated cleaning and disinfection procedures.