



SPECIAL 510(k) SUBSTANTIAL EQUIVALENCE DETERMINATION DECISION SUMMARY

I Background Information:

A 510(k) Number

K262116

B Applicant

Trividia Health, Inc.

C Proprietary and Established Names

TRUE METRIX 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: TRUE METRIX Self Monitoring Blood Glucose Meter (K140100).
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. The reassignment of test strip error conditions caused by very high glucose levels (>900 mg/dL) from the “E-5” error code to the new “EHi” error code.
 - b. Updated device labeling to reflect the software modifications to the error code messaging and appropriate actions to be taken by the user.
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 (K120989) demonstrating complete inactivation of hepatitis B virus (HBV) with the chosen disinfectant PDI Super Sani-Cloth wipes (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.