



September 24, 2021

Microgenics Corporation
Nikhita Tandon
Regulatory Affairs Specialist III
46500 Kato Road
Fremont, California 94538

Re: K211973

Trade/Device Name: DRI Cocaine Metabolite Assay
Regulation Number: 21 CFR 862.3250
Regulation Name: Cocaine and cocaine metabolite test system
Regulatory Class: Class II
Product Code: DIO
Dated: June 22, 2021
Received: June 25, 2021

Dear Nikhita Tandon:

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. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm> identifies combination product submissions. 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. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. 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 Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance>) and CDRH Learn (<https://www.fda.gov/training-and-continuing-education/cdrh-learn>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Marianela Perez-Torres, Ph.D.
Deputy Director
Division of Chemistry and Toxicology Devices
OHT7: Office of In Vitro Diagnostics and Radiological Health
Office of Product Evaluation and Quality
Center for Devices and Radiological Health
Food and Drug Administration

Enclosure

Indications for Use

510(k) Number (if known)
K211973

Device Name
DRI Cocaine Metabolite Assay

Indications for Use (Describe)

The Alinity c Cocaine assay is a homogeneous enzyme immunoassay intended for the qualitative and/or semi-quantitative determination of benzoylecgonine (Cocaine Metabolite) in human urine at a cutoff concentration of either 150 ng/mL or 300 ng/mL on the Alinity c analyzer.

The semiquantitative application is for the purpose of enabling laboratories to determine an appropriate dilution of the specimen for confirmation by a confirmatory method such as Liquid Chromatography/Tandem Mass Spectrometry (LC-MS/MS) or permitting laboratories to establish quality control procedures.

The assay 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) or Liquid Chromatography/Tandem Mass Spectrometry (LC-MS/MS) are the preferred confirmatory method. Tests for cocaine metabolite cannot distinguish between abused drugs and certain prescribed medications.

Clinical and professional judgment should be applied to any drug of abuse test result, particularly when preliminary results are used. For In Vitro Diagnostic Use Only.

Type of Use (Select one or both, as applicable)

Prescription Use (Part 21 CFR 801 Subpart D)

Over-The-Counter Use (21 CFR 801 Subpart C)

CONTINUE ON A SEPARATE PAGE IF NEEDED.

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510(k) Summary

510(k)#: K211973

This 510(k) Summary of Safety and Effectiveness is being submitted in accordance with the requirements of Safe Medical Device Act of 1990 and 21 CFR 807.92.

A. Device Information

Category	Comments
Sponsor:	Microgenics Corporation Thermo Fisher Scientific 46500 Kato Road Fremont, CA 94538 Phone: 510-979-5000 FAX: 510-979-5002
Correspondent Contact Information:	Nikhita Tandon Regulatory Affairs Specialist III Email: nikhita.tandon@thermofisher.com Phone: 510-979-5000 Cell: 678-964-5599 FAX: 510-979-5002
Device Common Name:	Cocaine Metabolite Enzyme Immunoassay
Trade or Proprietary Name	DRI Cocaine Metabolite Assay
Brand Name	Alinity c Cocaine Assay
Predicate Device Product Code, Classification, Classification Name & Panel	DIO, Class II, 21 CFR 862. 3250 – Opiate test system, 91 – Toxicology

Predicate Device Information:

Predicate Device:	DRI Cocaine Metabolite Assay
Predicate Device Manufacturer:	Microgenics Corporation
Predicate Device Common Name	Cocaine Metabolite Enzyme Immunoassay
Predicate Device Premarket Notification #:	K181499
Predicate Device Product Code, Classification, Classification Name & Panel	DIO, Class II, 21 CFR 862. 3250 – Opiate test system, 91 – Toxicology

B. Date Summary Prepared

September 16, 2021

C. Description of Device

The DRI Cocaine Metabolite Assay is a homogeneous enzyme immunoassay using ready-to-use liquid reagents. The assay uses a specific antibody, which can detect benzoylecgonine in

urine. The assay is based on the competition of an enzyme glucose-6-phosphate dehydrogenase (G6PDH) labeled drug and the drug from the urine sample for a fixed amount of specific antibody binding sites. In the presence of free drug from the sample, the free drug occupies the antibody binding sites, allowing the drug-labeled G6PDH to interact with the substrate, resulting in enzyme activity. In the absence of drug from the sample, the specific antibody binds to the drug labeled with G6PDH and the enzyme activity is inhibited. This phenomenon creates a direct relationship between the drug concentration in the urine and the enzyme activity. The enzyme G6PDH activity is determined spectrophotometrically at 340 nm by measuring its ability to convert nicotinamide adenine dinucleotide (NAD) to NADH.

The assay consists of reagents (A and E).

Reagent A: Contains mouse monoclonal anti-benzoyllecgonine antibody, glucose-6-phosphate (G6P), and nicotinamide adenine dinucleotide (NAD) in Tris buffer with sodium azide as preservative.

Reagent E: Contains benzoyllecgonine analog labeled with glucose-6-phosphate dehydrogenase (G6PDH) in HEPES buffer with sodium azide as preservative.

D. Intended Use

The Alinity c Cocaine assay is a homogeneous enzyme immunoassay intended for the qualitative and/or semi-quantitative determination of benzoyllecgonine (Cocaine Metabolite) in human urine at a cutoff concentration of either 150 ng/mL or 300 ng/mL on the Alinity c analyzer.

The semiquantitative application is for the purpose of enabling laboratories to determine an appropriate dilution of the specimen for confirmation by a confirmatory method such as Liquid Chromatography/Tandem Mass Spectrometry (LC-MS/MS) or permitting laboratories to establish quality control procedures.

The assay 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) or Liquid Chromatography/Tandem Mass Spectrometry (LC-MS/MS) are the preferred confirmatory method. Tests for cocaine metabolite cannot distinguish between abused drugs and certain prescribed medications.

Clinical and professional judgment should be applied to any drug of abuse test result, particularly when preliminary results are used. For In Vitro Diagnostic Use Only.

E. Comparison to Predicate Device

Characteristics	Candidate Device: DRI Cocaine Metabolite Assay	Predicate Device: DRI Cocaine Metabolite Assay(K181499)
Intended Use	<p>The Alinity c Cocaine assay is a homogeneous enzyme immunoassay intended for the qualitative and/or semi-quantitative determination of benzoylecgonine (Cocaine Metabolite) in human urine at a cutoff concentration of either 150 ng/mL or 300 ng/mL on the Alinity c analyzer.</p> <p>The semiquantitative application is for the purpose of enabling laboratories to determine an appropriate dilution of the specimen for confirmation by a confirmatory method such as Liquid Chromatography/Tandem Mass Spectrometry (LC-MS/MS) or permitting laboratories to establish quality control procedures.</p> <p>The assay 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) or Liquid Chromatography/Tandem Mass Spectrometry (LC-MS/MS) are the preferred confirmatory method. Tests for cocaine metabolite cannot distinguish between abused drugs and certain prescribed medications.</p> <p>Clinical and professional judgment should be applied to any drug of abuse test result, particularly when preliminary results are used. For In Vitro Diagnostic Use Only.</p>	<p>The DRI Cocaine Metabolite Enzyme Immunoassay is a homogeneous enzyme immunoassay intended for the qualitative and/or semi-quantitative determination of benzoylecgonine (Cocaine Metabolite) in human urine at a cutoff concentration of either 150 ng/mL or 300 ng/mL.</p> <p>The semi-quantitative mode is for the purpose of enabling laboratories to determine an appropriate dilution of the specimen for confirmation by a confirmatory method such as Liquid Chromatography/tandem mass spectrometry (LC-MS/MS) or permitting laboratories to establish quality control procedures.</p> <p>The assay 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) or Liquid chromatography/tandem mass spectrometry (LC-MS/MS) is the preferred confirmatory method. Tests for cocaine metabolite cannot distinguish between abused drugs and certain prescribed medications.</p> <p>Clinical and professional judgment should be applied to any drug of abuse test result, particularly when preliminary results are used. For In Vitro Diagnostic Use Only.</p>

Characteristics	Candidate Device: DRI Cocaine Metabolite Assay	Predicate Device: DRI Cocaine Metabolite Assay(K181499)
Operating Principle (Technology)	DRI	Same
Measured Analyte	Benzoylcegonine	Same
Test Matrix	Urine	Same
Cut-off Levels	150 ng/mL and 300 ng/mL	Same
Methodology	Homogeneous Enzyme Immunoassay	Same
Reagents Form	Liquid ready-to-use.	Same
Antibody	Mouse monoclonal antibodies	Same
Storage	2–8 °C until expiration date.	Same
Principal Operator	Trained professionals	Same
Calibrator Levels for Semi-Quant	5-point Calibrator	5-point Calibrator
Reference Instrument	Alinity c Analyzer System	Beckman Coulter AU680 Clinical Chemistry Analyzer

F. Test Principle

The DRI Cocaine Metabolite Assay is a homogeneous enzyme immunoassay using ready-to-use liquid reagents. The assay uses a specific antibody, which can detect benzoylcegonine in urine. The assay is based on the competition of an enzyme glucose-6-phosphate dehydrogenase (G6PDH) labeled drug and the drug from the urine sample for a fixed amount of specific antibody binding sites. In the presence of free drug from the sample, the free drug occupies the antibody binding sites, allowing the drug-labeled G6PDH to interact with the substrate, resulting in enzyme activity. In the absence of drug from the sample, the specific antibody binds to the drug labeled with G6PDH and the enzyme activity is inhibited. This phenomenon creates a direct relationship between the drug concentration in the urine and the enzyme activity. The enzyme G6PDH activity is determined spectrophotometrically at 340 nm by measuring its ability to convert nicotinamide adenine dinucleotide (NAD) to NADH.

G. Summary of Supporting Data

1. Analytical Performance:

Performance is evaluated on the Alinity c Analyzer System.

a) Precision

Precision studies were performed in accordance with CLSI Guideline EP05-A3. Samples were prepared by spiking Benzoylcegonine (Cocaine Metabolite) into drug free urine at the cutoff, 25%, 50%, 75% and 100% above and below the cutoff and tested in both qualitative and semi-quantitative

modes. Results presented below were generated by testing all samples in replicates of 3, twice per day for 20 days, total n=120. The results for both cutoffs are summarized in the tables below:

Qualitative Study Analysis for 150 ng/mL cutoff

Spiked Concentration (ng/mL)	% of Cutoff (150 ng/mL)	Total Precision (n=120)	
		# of Determinants	Immunoassay Results (Negative/Positive)
0	-100%	119	119/0
37.5	-75%	120	120/0
75	-50%	120	120/0
112.5	-25%	120	120/0
150	100%	120	76/44
187.5	+25%	120	0/120
225	+50%	120	0/120
262.5	+75%	120	0/120
300	+100%	120	0/120

Qualitative Study Analysis for 300 ng/mL cutoff

Spiked Concentration (ng/mL)	% of Cutoff (300 ng/mL)	Total Precision (n=120)	
		# of Determinants	Immunoassay Results (Negative/Positive)
0	-100%	119	119/0
75	-75%	120	120/0
150	-50%	120	120/0
225	-25%	120	120/0
300	100%	120	44/76
375	+25%	120	0/120
450	+50%	120	0/120
525	+75%	120	0/120
600	+100%	120	0/120

Semi-Quantitative Study Analysis for 150 ng/mL cutoff

Spiked Concentration (ng/mL)	% of Cutoff (150 ng/mL)	Total Precision (n=120)	
		# of Determinants	Immunoassay Results (Negative/Positive)
0	-100%	119	119/0
37.5	-75%	120	120/0
75	-50%	120	120/0
112.5	-25%	120	120/0
150	100%	120	73/47
187.5	+25%	120	0/120
225	+50%	120	0/120
262.5	+75%	120	0/120
300	+100%	119	0/119

Semi-Quantitative Study Analysis for 300 ng/mL cutoff

Spiked Concentration (ng/mL)	% of Cutoff(300 ng/mL)	Total Precision (n=120)	
		# of Determinants	Immunoassay Results (Negative/Positive)
0	-100%	119	119/0
75	-75%	120	120/0
150	-50%	120	120/0
225	-25%	120	120/0
300	100%	119	42/77
375	+25%	120	0/120
450	+50%	120	0/120
525	+75%	120	0/120
600	+100%	120	0/120

b) Spike Recovery

The study was performed for at least 21 replicates. This study was carried out by testing spiked samples containing Benzoylcegonine (Cocaine Metabolite) at the cutoff calibrator and control levels. The spiked samples were prepared by spiking Benzoylcegonine (Cocaine Metabolite) into drug free urine. Samples were tested in both qualitative and semi-quantitative mode. The qualitative results for both cutoffs are summarized in the tables below.

Qualitative Data for 150 ng/mL cutoff

Replicates	112.5 ng/mL(n=25)	187.5 ng/mL(n=25)
1	Negative	Positive
2	Negative	Positive
3	Negative	Positive
4	Negative	Positive
5	Negative	Positive
6	Negative	Positive
7	Negative	Positive
8	Negative	Positive
9	Negative	Positive
10	Negative	Positive
11	Negative	Positive
12	Negative	Positive
13	Negative	Positive
14	Negative	Positive
15	Negative	Positive
16	Negative	Positive
17	Negative	Positive
18	Negative	Positive
19	Negative	Positive
20	Negative	Positive
21	Negative	Positive
22	Negative	Positive
23	Negative	Positive
24	Negative	Positive
25	Negative	Positive
Overlap	No	No
Relative to C/O	All 25 below C/O	All 25 above C/O

Qualitative Data for 300 ng/mL cutoff

Replicates	225 ng/mL(n=25)	375 ng/mL(n=25)
1	Negative	Positive
2	Negative	Positive
3	Negative	Positive
4	Negative	Positive
5	Negative	Positive
6	Negative	Positive
7	Negative	Positive
8	Negative	Positive
9	Negative	Positive
10	Negative	Positive

Replicates	225 ng/mL(n=25)	375 ng/mL(n=25)
11	Negative	Positive
12	Negative	Positive
13	Negative	Positive
14	Negative	Positive
15	Negative	Positive
16	Negative	Positive
17	Negative	Positive
18	Negative	Positive
19	Negative	Positive
20	Negative	Positive
21	Negative	Positive
22	Negative	Positive
23	Negative	Positive
24	Negative	Positive
25	Negative	Positive
Overlap	No	No
Relative to C/O	All 25 below C/O	All 25 above C/O

c) Analytical Recovery and Linearity

Linearity studies were performed in accordance with CLSI Guideline EP06-A. To demonstrate the dilution linearity for purposes of sample dilution and quality control of the entire assay range, drug free urine was spiked to the high level calibrator using Benzoylecgonine (Cocaine Metabolite) (1000 ng/mL) and diluted with drug free urine to generate 9 intermediate levels.

Each sample was run in replicates of five in semi-quantitative mode and the average was used to determine percent recovery compared to the expected target value. The percent recovery is summarized in the table below:

Level	Expected Concentration(ng/mL)	Observed Mean Concentration (ng/mL)	Recovery (%)
1	0.0	0.0	N/A
2	103.2	98.8	95.7
3	206.4	230.1	111.4
4	309.7	344.3	111.2
5	412.9	428.8	103.9
6	516.1	502.2	97.3
7	619.3	655.3	105.8
8	722.6	757.2	104.8
9	825.8	892.0	108.0
10	929.0	922.3	99.3
11	1032.2	1032.2	100.0

d) Method Comparison and Accuracy

The method comparison study was performed in accordance with CLSI Guideline CLSIEP09c 3rd Edition. At least one hundred patient samples were analyzed by the DRI Cocaine Metabolite Assay in both qualitative and semi-quantitative modes and the results were compared to LC-MS/MS. The qualitative and semi-quantitative results for both cutoffs are summarized in the tables below:

Semi-Quantitative Mode Accuracy study with LC-MS/MS as reference method for 150ng/mL cutoff

Candidate Device Results	Negative by LC-MS/MS	< 50% of Cutoff concentration by LC-MS/MS (< 75 ng/mL)	Near Cutoff Negative (Between 50% below the cutoff and the cutoff concentration as determined by LC-MS/MS) (75-149 ng/mL)	Near Cutoff Positive (Between the cutoff and 50% above the cutoff concentration as determined by LC-MS/MS) (150-225 ng/mL)	High Positives (Greater than 50% above cutoff concentration (> 225 ng/mL))
Positive	0	0	1	5	46
Negative	12	33	4	0	0

Agreement among Positives: 51/51 = 100%

Agreement among Negative: 49/50 = 98%

One result was found to be discordant, where the specimen had an interpretation of positive with the DRI Cocaine Metabolite Assay and an interpretation of negative with LC-MS/MS. The discordant results are provided below:

Sample ID	DRI Cocaine Metabolite Assay	LC-MS/MS
	Interpretation	Benzoylcegonine Concentration (ng/mL)
CEA00125	Positive	134

Semi-Quantitative Mode Accuracy study with LC-MS/MS as reference method for 300ng/mL cutoff

Candidate Device Results	Negative by LC-MS/MS	< 50% of Cutoff concentration by LC-MS/MS (< 150 ng/mL)	Near Cutoff Negative (Between 50% below the cutoff and the cutoff concentration as determined by LC-MS/MS) (150-299 ng/mL)	Near Cutoff Positive (Between the cutoff and 50% above the cutoff concentration as determined by LC-MS/MS) (300-450 ng/mL)	High Positives (Greater than 50% above cutoff concentration (> 450 ng/mL))
Positive	0	0	2	9	41
Negative	12	33	3	0	0

Agreement among Positives: 50/50 = 100%

Agreement among Negative: 48/50 = 96%

Two results were found to be discordant, where the specimens had an interpretation of positive with the DRI Cocaine Metabolite Assay (Alinity c Cocaine assay) and an interpretation of

negative with LC-MS/MS. The discordant results are provided below:

Sample ID	DRI Cocaine Metabolite Assay	LC-MS/MS
	Interpretation	Benzoyllecgonine Concentration (ng/mL)
CEA00028	Positive	268
CEA00124	Positive	211

Qualitative Accuracy study with LC-MS/MS as reference method for 150 ng/mL cutoff

Candidate Device Results	Negative by LC-MS/MS	< 50% of Cutoff concentration by LC-MS/MS (< 75 ng/mL)	Near Cutoff Negative (Between 50% below the cutoff and the cutoff concentration as determined by LC-MS/MS) (75 – 149 ng/mL)	Near Cutoff Positive (Between the cutoff and 50% above the cutoff concentration as determined by LC-MS/MS) (150-225 ng/mL)	High Positives (Greater than 50% above cutoff concentration (> 225 ng/mL)
Positive	0	0	1	5	46
Negative	12	33	4	0	0

Agreement among Positives: 51/51 = 100% Agreement among Negative: 49/50 = 98%

One result was found to be discordant, where the specimen had an interpretation of positive with the DRI Cocaine Metabolite Assay and an interpretation of negative with LC-MS/MS. The discordant results are provided below:

Sample ID	DRI Cocaine Metabolite Assay	LC-MS/MS
	Interpretation	Benzoyllecgonine Concentration (ng/mL)
CEA00125	Positive	134

Qualitative Accuracy study with LC-MS/MS as reference method for 300 ng/mL cutoff

Candidate Device Results	Negative by LC-MS/MS	< 50% of Cutoff concentration by LC-MS/MS (< 150 ng/mL)	Near Cutoff Negative (Between 50% below the cutoff and the cutoff concentration as determined by LC-MS/MS) (150-299 ng/mL)	Near Cutoff Positive (Between the cutoff and 50% above the cutoff concentration as determined by LC-MS/MS) (300-450 ng/mL)	High Positives (Greater than 50% above cutoff concentration (> 450 ng/mL)
Positive	0	0	2	9	41
Negative	12	33	3	0	0

Agreement among Positives: 50/50 = 100%

Agreement among Negative: 48/50 = 96%

Two results were found to be discordant, where the specimens had an interpretation of positive with the DRI Cocaine Metabolite Assay and an interpretation of negative with LC-MS/MS. The discordant results are provided below:

Sample ID	DRI Cocaine Metabolite Assay	LC-MS/MS
	Interpretation	Benzoyllecgonine Concentration (ng/mL)
CEA00028	Positive	268
CEA00124	Positive	211

e) Specificity

The cross-reactivity of Cocaine and its metabolites were evaluated by adding known amounts of each compound to drug-free negative urine. The results are summarized in the tables below:

Cross reactivity of Cocaine and its metabolites for 150 ng/mL cut off

Cocaine and metabolites	Tested Concentration (ng/mL)	Cross-reactivity(%)
Benzoyllecgonine	150	100
Cocaine	25,000	0.6
Cocaethylene	30,000	0.5
Ecgonine	90,000	0.17
Ecgonine Methyl Ester	100,000	<0.15
m-hydroxybenzoyllecgonine	300	50
Norcocaine	100,000	<0.15

Cross reactivity of Cocaine and its metabolites for 300 ng/mL cut-off

Cocaine and metabolites	Tested Concentration (ng/mL)	Cross-reactivity(%)
Benzoyllecgonine	300	100
Cocaine	50,000	0.6
Cocaethylene	60,000	0.5
Ecgonine	160,000	0.19
Ecgonine Methyl Ester	100,000	<0.3
m-hydroxybenzoyllecgonine	600	50
Norcocaine	100,000	<0.3

Structurally unrelated compounds were evaluated by adding each substance to Benzoyllecgonine spiked at 112.5 ng/mL (-25% of the 150 ng/mL cutoff concentration), 187.5 ng/mL (+25% of the 150 ng/mL cutoff concentration), 225 ng/mL (-25% of the 300 ng/mL cutoff concentration) and 375 ng/mL (+25% of the 300 ng/mL cutoff concentration), at the concentrations indicated. As shown in the table below, the controls were detected accurately, low control as negative and the high control as positive, indicating that all the compounds evaluated exhibited no significant cross-reactivity at the concentrations tested.

Structurally unrelated compounds spiked at the concentration listed below into Low and High control urine for 150 ng/mL cut-off

Structurally Unrelated Compounds	Tested Concentration (ng/mL)	Spiked Benzoyllecgonine Level	
		Low Control -25% of cutoff (112.5 ng/mL)	High Control +25% of cutoff (112.5 ng/mL)
		Positive/Negative	Positive/Negative
11-nor- Δ^9 -THC-COOH	100,000	Negative	Positive
1R,2S(-)-Ephedrine	100,000	Negative	Positive
1S,2R(+)-Ephedrine	100,000	Negative	Positive
Acetaminophen	1,000,000	Negative	Positive
Acetylsalicylic acid	1,000,000	Negative	Positive
Acyclovir	75,000	Negative	Positive
Albuterol	1,000,000	Negative	Positive
Amikacin	1,000,000	Negative	Positive
Amitriptyline	100,000	Negative	Positive
Amobarbital	100,000	Negative	Positive
Amoxicillin	1,000,000	Negative	Positive
Amphetamine	1,000,000	Negative	Positive
Azithromycin	75,000	Negative	Positive
Benzocaine	1,000,000	Negative	Positive
Buprenorphine	100,000	Negative	Positive
Bupropion	100,000	Negative	Positive
Caffeine	100,000	Negative	Positive
Calcium Carbonate	5,000,000	Negative	Positive
Carbamazepine	100,000	Negative	Positive
Carisoprodol	100,000	Negative	Positive
Chlorpromazine	500,000	Negative	Positive
Chlorzoxazone	1,000,000	Negative	Positive
cis-Tramadol	1,000,000	Negative	Positive
Clomipramine	100,000	Negative	Positive
Clonidine	100,000	Negative	Positive
Codeine	1,000,000	Negative	Positive
Cotinine	100,000	Negative	Positive
Dapsone	100,000	Negative	Positive
Desipramine	100,000	Negative	Positive
Dextromethorphan	100,000	Negative	Positive
Dihydrocodeine	100,000	Negative	Positive
Diphenhydramine	1,000,000	Negative	Positive
Doxepine	500,000	Negative	Positive
Doxycycline Hyclate	100,000	Negative	Positive
EDDP	100,000	Negative	Positive
Ethyl β -D-glucuronide	100,000	Negative	Positive

Structurally Unrelated Compounds	Tested Concentration (ng/mL)	Spiked Benzoyllecgonine Level	
		Low Control -25% of cutoff (112.5 ng/mL)	High Control +25% of cutoff (112.5 ng/mL)
		Positive/Negative	Positive/Negative
Fentanyl	100,000	Negative	Positive
Fluconazole	100,000	Negative	Positive
Fluoxetine	50,000	Negative	Positive
Gabapentin	100,000	Negative	Positive
Gentamicin	100,000	Negative	Positive
Haloperidol	100,000	Negative	Positive
Heroin	100,000	Negative	Positive
Hydrocodone	100,000	Negative	Positive
Hydromorphone	100,000	Negative	Positive
Hydroxyzine	100,000	Negative	Positive
Hyoscyamine HCl	75,000	Negative	Positive
Ibuprofen	5,000,000	Negative	Positive
Imipramine	100,000	Negative	Positive
Indomethacin	75,000	Negative	Positive
Lamotrigine	1,000,000	Negative	Positive
Levofloxacin	75,000	Negative	Positive
Lidocaine	1,000,000	Negative	Positive
Lithium heparin	5,000,000	Negative	Positive
Loratadine	500,000	Negative	Positive
LSD	100,000	Negative	Positive
Maprotiline	100,000	Negative	Positive
Meperidine	1,000,000	Negative	Positive
Mesoridazine	1,000,000	Negative	Positive

Structurally Unrelated Compounds	Tested Concentration (ng/mL)	Spiked Benzoyllecgonine Level	
		Low Control -25% of cutoff (112.5 ng/mL)	High Control +25% of cutoff (112.5 ng/mL)
		Positive/Negative	Positive/Negative
Methadone	1,000,000	Negative	Positive
Methamphetamine	100,000	Negative	Positive
Methylphenidate	100,000	Negative	Positive
Metoclopramide	1,000,000	Negative	Positive
Metronidazole	100,000	Negative	Positive
Morphine	200,000	Negative	Positive

Structurally Unrelated Compounds	Tested Concentration (ng/mL)	Spiked Benzoylcegonine Level	
		Low Control -25% of cutoff (112.5 ng/mL)	High Control +25% of cutoff (112.5 ng/mL)
		Positive/Negative	Positive/Negative
Morphine-3 β -D-glucuronide	100,000	Negative	Positive
Morphine-6 β -D-glucuronide	100,000	Negative	Positive
Nalbuphine	1,000,000	Negative	Positive
Nalorphine	100,000	Negative	Positive
Naloxone	100,000	Negative	Positive
Naltrexone	1,000,000	Negative	Positive
Naproxen	5,000,000	Negative	Positive
Nitrazepam	100,000	Negative	Positive
Norbuprenorphine	100,000	Negative	Positive
Norcodeine	100,000	Negative	Positive
Nordiazepam	100,000	Negative	Positive
Norfluoxetine HCl	1,000,000	Negative	Positive
Norketamine	100,000	Negative	Positive
Norproxyphene	100,000	Negative	Positive
Nortriptyline	100,000	Negative	Positive
Ofloxacin	100,000	Negative	Positive
Omeprazole	75,000	Negative	Positive
Oxazepam	1,000,000	Negative	Positive
Oxycodone	100,000	Negative	Positive
Oxymorphone	100,000	Negative	Positive
Paroxetine	100,000	Negative	Positive
PCP	1,000,000	Negative	Positive
Phenelzine	75,000	Negative	Positive
Phenobarbital	1,000,000	Negative	Positive
Promethazine	100,000	Negative	Positive
Propoxyphene	750,000	Negative	Positive
Ranitidine	100,000	Negative	Positive
Risperidone	100,000	Negative	Positive
Scopolamine	1,000,000	Negative	Positive
Secobarbital	1,000,000	Negative	Positive
Sertraline	100,000	Negative	Positive
Spironolactone	750,000	Negative	Positive
Stavudine	100,000	Negative	Positive
Tapentadol	100,000	Negative	Positive
Terbinafine	750,000	Negative	Positive
Thiopental	1,000,000	Negative	Positive
Thioridazine	750,000	Negative	Positive
Tobramycin	1,000,000	Negative	Positive

Structurally Unrelated Compounds	Tested Concentration (ng/mL)	Spiked Benzoyllecgonine Level	
		Low Control -25% of cutoff (112.5 ng/mL)	High Control +25% of cutoff (112.5 ng/mL)
		Positive/Negative	Positive/Negative
Tolmetin	750,000	Negative	Positive
Trazodone	1,000,000	Negative	Positive
Trimethoprim	1,000,000	Negative	Positive
Vancomycin	1,000,000	Negative	Positive
Venlafaxine	1,000,000	Negative	Positive
Verapamil	100,000	Negative	Positive
Zolpidem Tartrate	100,000	Negative	Positive

Structurally unrelated compounds spiked at the concentration listed below into Low and High control urine for 300 ng/mL cut-off

Structurally Unrelated Compounds	Tested Concentration (ng/mL)	Spiked Benzoyllecgonine Level	
		Low Control -25% of cutoff (112.5 ng/mL)	High Control +25% of cutoff (112.5 ng/mL)
		Positive/Negative	Positive/Negative
11-nor- Δ^9 -THC-COOH	100,000	Negative	Positive
1R,2S(-)-Ephedrine	100,000	Negative	Positive
1S,2R(+)-Ephedrine	100,000	Negative	Positive
Acetaminophen	1,000,000	Negative	Positive
Acetylsalicylic acid	1,000,000	Negative	Positive
Acyclovir	75,000	Negative	Positive
Albuterol	1,000,000	Negative	Positive
Amikacin	1,000,000	Negative	Positive
Amitriptyline	100,000	Negative	Positive
Amobarbital	100,000	Negative	Positive
Amoxicillin	1,000,000	Negative	Positive
Amphetamine	1,000,000	Negative	Positive
Azithromycin	75,000	Negative	Positive
Benzocaine	1,000,000	Negative	Positive
Buprenorphine	100,000	Negative	Positive
Bupropion	100,000	Negative	Positive
Caffeine	100,000	Negative	Positive
Calcium Carbonate	5,000,000	Negative	Positive
Carbamazepine	100,000	Negative	Positive
Carisoprodol	100,000	Negative	Positive
Chlorpromazine	500,000	Negative	Positive

Structurally Unrelated Compounds	Tested Concentration (ng/mL)	Spiked Benzoyllecgonine Level	
		Low Control -25% of cutoff (112.5 ng/mL)	High Control +25% of cutoff (112.5 ng/mL)
		Positive/Negative	Positive/Negative
Chlorzoxazone	1,000,000	Negative	Positive
cis-Tramadol	1,000,000	Negative	Positive
Clomipramine	100,000	Negative	Positive
Clonidine	100,000	Negative	Positive
Codeine	1,000,000	Negative	Positive
Cotinine	100,000	Negative	Positive
Dapsone	100,000	Negative	Positive
Desipramine	100,000	Negative	Positive
Dextromethorphan	100,000	Negative	Positive
Dihydrocodeine	100,000	Negative	Positive
Diphenhydramine	1,000,000	Negative	Positive
Doxepine	500,000	Negative	Positive
Doxycycline Hyclate	100,000	Negative	Positive
EDDP	100,000	Negative	Positive
Ethyl β -D-glucuronide	100,000	Negative	Positive
Fentanyl	100,000	Negative	Positive
Fluconazole	100,000	Negative	Positive
Fluoxetine	50,000	Negative	Positive
Gabapentin	100,000	Negative	Positive
Gentamicin	100,000	Negative	Positive
Haloperidol	100,000	Negative	Positive
Heroin	100,000	Negative	Positive
Hydrocodone	100,000	Negative	Positive
Hydromorphone	100,000	Negative	Positive
Hydroxyzine	100,000	Negative	Positive
Hyoscyamine HCl	75,000	Negative	Positive
Ibuprofen	5,000,000	Negative	Positive
Imipramine	100,000	Negative	Positive
Indomethacin	75,000	Negative	Positive
Lamotrigine	1,000,000	Negative	Positive
Levofloxacin	75,000	Negative	Positive
Lidocaine	1,000,000	Negative	Positive
Lithium heparin	5,000,000	Negative	Positive
Loratadine	500,000	Negative	Positive
LSD	100,000	Negative	Positive
Maprotiline	100,000	Negative	Positive
Meperidine	1,000,000	Negative	Positive
Mesoridazine	1,000,000	Negative	Positive

Structurally Unrelated Compounds	Tested Concentration (ng/mL)	Spiked Benzoyllecgonine Level	
		Low Control -25% of cutoff (112.5 ng/mL)	High Control +25% of cutoff (112.5 ng/mL)
		Positive/Negative	Positive/Negative
Methadone	1,000,000	Negative	Positive
Methamphetamine	100,000	Negative	Positive
Methylphenidate	100,000	Negative	Positive
Metoclopramide	1,000,000	Negative	Positive
Metronidazole	100,000	Negative	Positive
Morphine	200,000	Negative	Positive
Morphine-3 β -D-glucuronide	100,000	Negative	Positive
Morphine-6 β -D-glucuronide	100,000	Negative	Positive
Nalbuphine	1,000,000	Negative	Positive
Nalorphine	100,000	Negative	Positive
Naloxone	100,000	Negative	Positive
Naltrexone	1,000,000	Negative	Positive
Naproxen	5,000,000	Negative	Positive
Nitrazepam	100,000	Negative	Positive
Norbuprenorphine	100,000	Negative	Positive
Norcodeine	100,000	Negative	Positive
Nordiazepam	100,000	Negative	Positive
Norfluoxetine HCl	1,000,000	Negative	Positive
Norketamine	100,000	Negative	Positive
Norproxyphene	100,000	Negative	Positive
Nortriptyline	100,000	Negative	Positive
Ofloxacin	100,000	Negative	Positive
Omeprazole	75,000	Negative	Positive
Oxazepam	1,000,000	Negative	Positive
Oxycodone	100,000	Negative	Positive
Oxymorphone	100,000	Negative	Positive
Paroxetine	100,000	Negative	Positive
PCP	1,000,000	Negative	Positive
Phenelzine	75,000	Negative	Positive
Phenobarbital	1,000,000	Negative	Positive
Promethazine	100,000	Negative	Positive
Propoxyphene	750,000	Negative	Positive
Ranitidine	100,000	Negative	Positive

Structurally Unrelated Compounds	Tested Concentration (ng/mL)	Spiked Benzoyllecgonine Level	
		Low Control -25% of cutoff (112.5 ng/mL)	High Control +25% of cutoff (112.5 ng/mL)
		Positive/Negative	Positive/Negative
Risperidone	100,000	Negative	Positive
Scopolamine	1,000,000	Negative	Positive
Secobarbital	1,000,000	Negative	Positive
Sertraline	100,000	Negative	Positive
Spirolactone	750,000	Negative	Positive
Stavudine	100,000	Negative	Positive
Tapentadol	100,000	Negative	Positive
Terbinafine	750,000	Negative	Positive
Thiopental	1,000,000	Negative	Positive
Thioridazine	750,000	Negative	Positive
Tobramycin	1,000,000	Negative	Positive
Tolmetin	750,000	Negative	Positive
Trazodone	1,000,000	Negative	Positive
Trimethoprim	1,000,000	Negative	Positive
Vancomycin	1,000,000	Negative	Positive
Venlafaxine	1,000,000	Negative	Positive
Verapamil	100,000	Negative	Positive
Zolpidem Tartrate	100,000	Negative	Positive

f) Interference

The interference studies were performed in accordance with CLSI Guideline EP07- A3, using both qualitative and semi-quantitative modes. The potential interference of pH, endogenous and exogenous physiologic substances on recovery of Benzoyllecgonine using DRI Cocaine Metabolite Assay was assessed by spiking known compounds of potentially interfering substances into the low control, 112.5 ng/mL (-25% of the cutoff concentration of 150 ng/mL) and 225 ng/mL (-25% of the cutoff concentration of 300 ng/mL) and high control, 187.5 ng/mL (+25% of the cutoff concentration of 150 ng/mL) and 375 ng/mL (+25% of the cutoff concentration of 300 ng/mL). In the presence of the compounds listed below, the controls were detected accurately, indicating that these compounds did not show interference in the assay.

Interference substances for 150 ng/mL cut-off

Compound	Tested Concentration(mg/dL)	Spiked Benzoylcegonine Level	
		Low Control -25% of cutoff (112.5 ng/mL)	High Control +25% of cutoff (187.5 ng/mL)
Acetaminophen	10	Negative	Positive
Acetone	1000	Negative	Positive
Ascorbic Acid	1000	Negative	Positive
Aspirin	10	Negative	Positive
Caffeine	10	Negative	Positive
Creatinine	500	Negative	Positive
Ethanol	1000	Negative	Positive
Galactose	10	Negative	Positive
γ -Globulin	500	Negative	Positive
Glucose	3000	Negative	Positive
Hemoglobin	150	Negative	Positive
Human Serum Albumin	500	Negative	Positive
Ibuprofen	10	Negative	Positive
Oxalic Acid	100	Negative	Positive
Riboflavin	7.5	Negative	Positive
Sodium Chloride	1000	Negative	Positive
Urea	1250	Negative	Positive
pH			
pH	3	Negative	Positive
pH	4	Negative	Positive
pH	5	Negative	Positive
pH	6	Negative	Positive
pH	7	Negative	Positive
pH	8	Negative	Positive
pH	9	Negative	Positive
pH	10	Negative	Positive
pH	11	Negative	Positive

Interference substances for 300 ng/mL cut-off

Compound	Tested Concentration(mg/dL)	Spiked Benzoylcegonine Level	
		Low Control -25% of cutoff (225 ng/mL)	High Control +25% of cutoff (375 ng/mL)
Acetaminophen	10	Negative	Positive
Acetone	1000	Negative	Positive
Ascorbic Acid	1000	Negative	Positive
Aspirin	10	Negative	Positive
Caffeine	10	Negative	Positive
Creatinine	500	Negative	Positive
Ethanol	1000	Negative	Positive
Galactose	10	Negative	Positive
γ-Globulin	500	Negative	Positive
Glucose	3000	Negative	Positive
Hemoglobin	150	Negative	Positive
Human Serum Albumin	500	Negative	Positive
Ibuprofen	10	Negative	Positive
Oxalic Acid	100	Negative	Positive
Riboflavin	7.5	Negative	Positive
Sodium Chloride	1000	Negative	Positive
Urea	1250	Negative	Positive
pH			
pH	3	Negative	Positive
pH	4	Negative	Positive
pH	5	Negative	Positive
pH	6	Negative	Positive
pH	7	Negative	Positive
pH	8	Negative	Positive
pH	9	Negative	Positive
pH	10	Negative	Positive
pH	11	Negative	Positive

g) Specific Gravity

Drug free urine samples with specific gravity ranging in value within 1.004 to 1.029 were split and spiked with Benzoylcegonine to a final concentration of either 112.5 ng/mL or 225 ng/mL (the low control concentrations) or 187.5 ng/mL or 375 ng/mL (high control concentrations). These samples were then evaluated in both qualitative and semi-quantitative modes. The controls were detected accurately, indicating that no interference was observed.

Specific gravity interference data for 150 ng/mL cut-off

Specific Gravity	Spiked Benzoyllecgonine Level	
	Low Control	High Control
1.004	Negative	Positive
1.005	Negative	Positive
1.007	Negative	Positive
1.010	Negative	Positive
1.011	Negative	Positive
1.013	Negative	Positive
1.019	Negative	Positive
1.023	Negative	Positive
1.025	Negative	Positive
1.029	Negative	Positive

Specific gravity interference data for 300 ng/mL cut-off

Specific Gravity	Spiked Benzoyllecgonine Level	
	Low Control	High Control
1.004	Negative	Positive
1.005	Negative	Positive
1.007	Negative	Positive
1.010	Negative	Positive
1.011	Negative	Positive
1.013	Negative	Positive
1.019	Negative	Positive
1.023	Negative	Positive
1.025	Negative	Positive
1.029	Negative	Positive

H. Conclusion

The information supports a determination of substantial equivalence between DRI Cocaine Metabolite Assay and the predicate device DRI Cocaine Metabolite Assay (K181499).