



March 22, 2021

Gold Standard Diagnostics
Jennifer Roth
Vice President, Product Development
2851 Spafford St.
Davis, California 95618

Re: K203296

Trade/Device Name: Gold Standard Diagnostics Borrelia burgdorferi IgG ELISA Test Kit
Regulation Number: 21 CFR 866.3830
Regulation Name: Treponema Pallidum Treponemal Test Reagents
Regulatory Class: Class II
Product Code: LSR
Dated: November 4, 2020
Received: November 9, 2020

Dear Jennifer Roth:

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 and Part 809); 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,

Maria Ines Garcia, Ph.D.
Branch Chief
Division of Microbiology Devices
OHT7: Office of In Vitro Diagnostics
and Radiological Health
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number (if known)
K203296

Device Name
Gold Standard Diagnostics Borrelia burgdorferi IgG ELISA Test Kit

Indications for Use (Describe)

The Gold Standard Diagnostics Borrelia burgdorferi IgG ELISA Test Kit is intended as a qualitative test for the detection of IgG antibodies to B. burgdorferi sensu stricto in human serum from symptomatic patients or people suspected of infection. When used as the first-tier screening test, positive and equivocal results must be supplemented through additional testing by one of the following methods:

- Standard two-tier test methodology (STTT) using an IgG blot test following current interpretation guidelines, OR
- Modified two-tier test methodology (MTTT) using the Gold Standard Diagnostics Borrelia burgdorferi VlsE-OspC IgG/IgM ELISA Test.

The assay can also be used as a second-tier confirmation test using the MTTT methodology when used with the Gold Standard Diagnostics Borrelia burgdorferi VlsE-OspC IgG/IgM ELISA Test as the first-tier screening test.

Positive test results by either the STTT or MTTT methodology are supportive evidence for the presence of antibodies and exposure to Borrelia burgdorferi, the cause of Lyme disease. A diagnosis of Lyme disease should be made based on the presence of Borrelia burgdorferi antibodies, history, symptoms, and other laboratory findings.

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

This 510(k) summary is being submitted in accordance with the requirement of SMDA 1990 and 21 CFR 807.92.

- 1) Submitter's Name:** Gold Standard Diagnostics
Address: 620 Cantrill Drive Davis, CA. 95618
Phone Number: 530-759-8000
Contact Person: Jennifer Roth
Date: November 3, 2020

- 2) Product and Trade Name:**
Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test Kit

Common Name:
Lyme ELISA Test

Regulation Section:
(21 CFR 866.3830) Treponema pallidum treponemal test reagents.

Classification:
Class II

Product Code:
LSR; Reagent, Borrelia Serological Reagent

Note: This clearance is for a modified use (Modified Two-tier Testing or MTTT use) for the previously cleared IVD test, the Gold Standard Diagnostics Borrelia burgdorferi IgG ELISA Test Kit (K200025). The information and study data for the modified use is presented under the heading of "MTTT Comparison" below. With the exception of the intended use, all other information and data remain the same.

- 3) Legally Marketed Device to Which the Submitter Claims Equivalence:**
 - a. STTT - Trinity Biotech MarDx *Borrelia burgdorferi* EIA IgG Test Kit (K894224).
 - b. MTTT - Gold Standard Diagnostics *Borrelia burgdorferi* IgG Blot Test Kit (K113847)

- 4) Description of the Device:**

The kit includes 12 x 8 well Antigen Coated strips, Conjugate, Substrate, Stop Solution, Wash Buffer, Diluent, Negative Control, Positive Control, and Cutoff Control. The controls are provided to determine if the assay is functioning properly and to determine the antibody level. The reagents are sufficient for 96 determinations.

During the test procedure, antibodies to *B. burgdorferi* (sensu stricto) if present in the human serum sample will bind to the antigens coated onto the wells forming antigen-antibody complexes. Excess antibodies are removed by washing. A conjugate of goat anti-human IgG

antibodies conjugated with horseradish peroxidase is then added, which binds to the antigen-antibody complexes. Excess conjugate is removed by washing. This is followed by the addition of a chromogenic substrate, tetramethylbenzidine (TMB). If specific antibodies to the antigen are present in the patients' serum, a blue color will develop. The enzymatic reaction is then stopped with a stopping solution causing the contents of the well to turn yellow. The wells are read photometrically with a microplate reader at 450nm.

The antigens used in the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test kit is a combination of *B. burgdorferi* sensu stricto strain B31 lysate, *B. burgdorferi* sensu stricto strain 2591 lysate, and a recombinant VlsE from *B. burgdorferi* sensu stricto strain B31. The lysates use spirochetes growing in BSK-H complete medium until mid-exponential phase. The recombinant VlsE protein is produced in *E. coli* SURE2 cells and purified by affinity chromatography. The purity of each antigen is assayed by SDS-PAGE followed by Coomassie staining and/or Western blotting.

5) Intended Use of the Device:

The Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test Kit is intended as a qualitative test for the detection of IgG antibodies to *B. burgdorferi sensu stricto* in human serum from symptomatic patients or people suspected of infection. When used as the first-tier screening test, positive and equivocal results must be supplemented through additional testing by one of the following methods:

- Standard two-tier test methodology (STTT) using an IgG blot test following current interpretation guidelines, OR
- Modified two-tier test methodology (MTTT) using the Gold Standard Diagnostics *Borrelia burgdorferi* VlsE-OspC IgG/IgM ELISA Test.

The assay can also be used as a second-tier confirmation test using the MTTT methodology when used with the Gold Standard Diagnostics *Borrelia burgdorferi* VlsE-OspC IgG/IgM ELISA Test as the first-tier screening test.

Positive test results by either the STTT or MTTT methodology are supportive evidence for the presence of antibodies and exposure to *Borrelia burgdorferi*, the cause of Lyme disease. A diagnosis of Lyme disease should be made based on the presence of *Borrelia burgdorferi* antibodies, history, symptoms, and other laboratory findings.

6) Comparison with the Predicate Device:

The tables below provide a comparison of the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test kit with the Trinity Biotech MarDx *Borrelia burgdorferi* EIA IgG Test kit (predicate device: K894224).

Similarities		
Item	Subject Device: Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA Test Kit	Predicate Device: Trinity Biotech MarDx <i>Borrelia burgdorferi</i> EIA IgG Test Kit
Intended Use	The Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA	Trinity Biotech MarDx <i>Borrelia burgdorferi</i> EIA IgG Test System is a

	Test kit is intended as a qualitative presumptive (first step) test for the detection of IgG antibodies to <i>B. burgdorferi sensu stricto</i> in human serum from symptomatic patients or people suspected of infection. Positive and equivocal results must be supplemented by testing with a second-step Western blot assay.	qualitative test intended for use in the presumptive detection of human IgG antibodies to <i>Borrelia burgdorferi</i> in human serum. This EIA system should be used to test serum from patients with a history and symptoms of infection with <i>B. burgdorferi</i> . All positive and equivocal specimens should be retested with a highly specific, second-tier test such as Western blot. Positive second-tier results are supportive evidence of infection with <i>B. burgdorferi</i> . The diagnosis of Lyme disease should be made based on history and symptoms (such as erythema migrans), and other laboratory data, in addition to the presence of antibodies to <i>B. burgdorferi</i> . Negative results (either first or second-tier) should not be used to exclude Lyme disease.
Assay Format	Antigen coated microtiter plate – 96 wells.	Same
Technology	ELISA	Same
Sample Matrix	Human serum	Same
Sample Processing	Dilute Samples 1:100 in Diluent	Same
Controls Provided	Positive, Cutoff, Negative	Same
Reagents Provided	Diluent, Wash, Conjugate, Substrate, Stop Solution	Same
Reported Results	Positive, Equivocal, Negative	Same
Interpretation	Optical density readings from Spectrophotometer	Same

Differences		
Item	Subject Device: Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA Test Kit	Predicate Device: Trinity Biotech MarDx <i>Borrelia burgdorferi</i> EIA IgG Test Kit
Volumes	100ul sample, 50ul substrate, 50ul stop solution	100ul sample, 100ul substrate, 100ul stop solution
Incubation	15/15/15 minutes at room temperature	30/30/10 minutes at room temperature
Antigens	<i>B. burgdorferi</i> B31 strain, <i>B. burgdorferi</i> 2591 strain, <i>B. burgdorferi</i> recombinant VlsE B31 strain	<i>B. burgdorferi</i> B31 strain
Results Interpretation	Convert to units. Negative <9 Equivocal 9.0-11.0	Convert to units. Negative <0.80 Equivocal 0.80-1.19

	Positive >11.0	Positive ≥1.2
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6(b1): Nonclinical Studies:

Determination of the Assay Cutoff

The cutoff was determined by testing a total of 210 normal sera which consisted of 105 sera from an endemic region of Lyme disease and 105 sera from a non-endemic region of Lyme disease. The mean plus two standard deviations was used to determine the assay cutoff. A known positive sample was then diluted to produce a ready to use cutoff control. An additional 194 samples consisting of 114 samples from different phases of Lyme disease, 8 negative healthy samples, 72 negative Lyme disease samples but do have other diseases that may cause serologic cross-reactivity, were tested. A receiver operating characteristics (ROC) analysis was performed to evaluate the performance of the assay and confirm that the chosen cutoff provided the best compromise between sensitivity and specificity.

Precision

To determine the precision of the *Borrelia burgdorferi* IgG ELISA Test, a within-lab precision study was conducted. A precision panel consisting of a negative sample, a high negative sample, a low positive sample, and a moderate positive sample, along with the kit controls, was tested in-house. The sample panel was masked and randomized. Each of the panel members was tested in duplicate, twice per day, for 12 days. The results are summarized in the following table:

Sample	N	Mean Units		Within-Run	Between-Run	Between-Day	Total
Moderate Positive	48	20.3	SD	1.488	1.312	1.257	1.439
			CV	7.3%	6.5%	6.2%	7.1%
Low Positive	48	11.5	SD	0.845	0.718	0.718	0.816
			CV	7.4%	6.2%	6.2%	7.1%
High Negative	48	8.3	SD	0.880	0.646	0.615	0.857
			CV	10.6%	7.8%	7.4%	10.4%
Negative	48	0.8	SD	0.116	0.049	0.076	0.113
			CV	14.2%	6.5%	10.0%	14.8%
Positive Control	48	17.2	SD	0.947	0.649	0.739	.932
			CV	5.5%	3.8%	4.3%	5.4%
Cutoff Control	48	10.1	SD	0.241	0.115	0.285	0.264
			CV	2.7%	1.1%	2.8%	2.6%
Negative Control	48	0.4	SD	0.052	0.424	0.144	0.051
			CV	12.9%	10.6%	11.0%	12.7%

Reproducibility

A reproducibility panel consisting of a negative sample, a high negative sample, a low positive sample, and a moderate positive sample, along with the kit controls, was tested at three different sites. The sample panel was masked and randomized. Each of the panel members was tested in triplicate, twice per day, for five days. The Within-Run, Between-Run, Between-Days, and Between-Sites Standard Deviation and Coefficients of Variation (CV) were calculated. The sample panel was masked and randomized. The results are summarized in the following table:

Sample	N	Mean Units		Within-Run	Between-Run	Between-Day	Between-Site	Total
Moderate Positive	90	21.0	SD	1.54	0.40	1.07	0.91	1.29
			CV	7.3%	1.9%	5.1%	4.3%	6.1%
Low Positive	90	13.7	SD	0.72	0.34	1.09	1.24	1.28
			CV	5.5%	2.6%	8.0%	9.1%	9.3%
High Negative	90	6.6	SD	0.76	0.27	0.46	0.68	0.67
			CV	11.7%	4.1%	7.0%	10.3%	10.2%
Negative	90	3.0	SD	0.33	0.56	0.49	0.56	0.55
			CV	21.1%	18.7%	16.4%	18.8%	18.3%
Positive Control	30	19.1	SD	0.65	0.67	0.67	0.63	0.62
			CV	3.5%	3.5%	3.5%	3.3%	3.2%
Cutoff Control	60	10.0	SD	0.25	0.22	0.23	0.22	0.22
			CV	2.4%	2.2%	2.3%	2.2%	2.2%
Negative Control	30	0.5	SD	0.08	0.06	0.06	0.50	0.50
			CV	11.0%	11.0%	11.0%	9.5%	9.6%

Analytical Specificity

The analytical specificity was determined by testing 208 asymptomatic individuals' samples from endemic and non-endemic regions. The Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test results are summarized in the following table:

	Number of Samples	Number Positive/Equivocal	Analytical Specificity
Endemic Region	103	4	96.1%
Non-endemic Region	105	0	100.0%

Cross Reactivity

A study using 377 samples was conducted to evaluate potential cross reactivity from different disease conditions. The samples were obtained from serum vendors who confirmed their positivity for each respective marker. The samples were tested on the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test. The results are summarized in the following table:

Infection / Diagnosis	Number of Sera Tested	# Positive / (%)
Tick-borne Relapsing Fever IgG	21	0 / (0%)
Treponemal Infections (TPPA)	23	0 / (0%)

Rickettsiosis IgG	25	6 / (24%)
Ehrlichiosis IgG	10	2 / (20%)
Babesiosis IgG	12	0 / (0%)
<i>H. pylori</i> IgG	11	0 / (0%)
Parvovirus B19 IgG	12	0 / (0%)
Influenza A&B IgG	12	0 / (0%)
Epstein-Barr Virus IgG	34	1 / (3%)
Cytomegalovirus IgG	31	0 / (0%)
Herpes Simplex Virus IgG	21	0 / (0%)
Varicella Zoster Virus	16	1 / (6%)
Fibromyalgia	32	0 / (0%)
Rheumatoid Arthritis	12	0 / (0%)
Autoimmune Disease	59	0 / (0%)
Multiple Sclerosis	23	0 / (0%)
Severe Periodontitis	23	0 / (0%)

Interfering Substances

The effect of potential interfering substances on samples using the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test was evaluated. Three samples, a high negative, an equivocal and a low positive were spiked with high levels of interferants and were tested along with serum without spiked interferants. The recommended concentrations from the guideline “Interference Testing in Clinical Chemistry” EP07-A3 from the Clinical and Laboratory Standards Institute were used (see table below). The tested substances did not affect the performance of the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test.

Substance	Concentration	Interference
Albumin	60 mg/ml	None detected
Bilirubin	0.4 mg/ml	None detected
Cholesterol	4.0 mg/ml	None detected
Hemoglobin	10 mg/ml	None detected
Triglycerides	15 mg/ml	None detected

6(b2): Clinical Studies:

Comparison with Predicate Device

Comparison studies were conducted at three sites (one internal and two external reference laboratories) using prospective samples submitted for Lyme serology testing. Five hundred twenty three (523) serum samples were tested on both the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test and on the predicate *B. burgdorferi* IgG ELISA Test. The results are summarized in the following table:

		Predicate IgG ELISA			Total
		Positive	Equivocal*	Negative	
Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA Test Kit	Positive	40	5	2	47
	Equivocal*	3	7	0	10
	Negative	2	4	460	466
	Total	45	16	462	523

*Equivocal samples counted as positive

Positive percent agreement = 90.2% (55/61) 95% CI (79.8% - 96.3%)

Negative percent agreement = 99.6% (460/462) 95% CI (98.5% - 99.9%)

Second-Tier Testing

All positive and equivocal samples by the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test and by the Predicate IgG ELISA were tested by a FDA cleared IgG blot assay. The results are summarized in the following table:

	Tier 1 Positive or Equivocal	IgG Blot Positive	IgG Blot Negative
Predicate IgG ELISA	61	37	24
Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA Test Kit	57	37	20
Predicate IgG ELISA + Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA Test Kit	55	37	18

Percent Agreement with Predicate Device		
2nd Tier PPA (95% CI)	100.0% (92.2% - 100.0%)	37/37

Clinical Sensitivity

Sensitivity Study

A sensitivity study was performed on 114 clinically characterized samples. The samples encompass early, disseminated, and late stages of Lyme disease. The samples were tested on both the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test and on the predicate *B. burgdorferi* IgG ELISA Test. The results are summarized in the following table:

Disease Stage	n	Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA Test Kit	Predicate IgG ELISA
Early	58	46.6% (27/58)	27.6% (16/58)
Disseminated	17	82.4% (14/17)	52.9% (9/17)
Late	39	97.4% (38/39)	97.4% (38/39)

CDC Panel

A panel of 280 positive and negative specimens from the Center of Disease Control (CDC) for Lyme disease detection was tested on both the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test and on the predicate device. The results are presented as a means to convey further information on the performance of the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test with a masked characterized serum panel. This does not imply an endorsement of the assay by the CDC. The results are summarized in the following table:

Disease Stage	n	Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA Test Kit		Predicate IgG ELISA	
		Positive or Equivocal	% Agreement with Clinical Diagnosis	Positive or Equivocal	% Agreement with Clinical Diagnosis
Healthy	100	1	99.0%	1	99.0%
Early Lyme	60	41	68.3%	21	35.0%
Cardiac Lyme	3	2	66.7%	3	100.0%
Neurological Lyme	7	6	85.7%	3	42.9%
Late	20	20	100.0%	20	100.0%
Look-alike Disease	90	11	87.8%	10	88.9%

Expected Values

The range of values and positivity rate among different studies and population for the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test are as follows:

Population	# Samples	Unit Results			Qualitative Results	
		Mean	Range	Std. Dev.	# Positive/ Equivocal	% Positive/ Equivocal
Normal Endemic	103	3.7	0.5 – 14.3	2.452	4	3.9%
Normal Non-Endemic	105	3.9	0.6 – 9.0	2.002	0	0.0%

Prospective Study	523	4.3	0.1 – 22.2	4.409	57	10.9%
Sensitivity Study	114	13.6	0.9 – 40.4	7.994	81	71.1 %

Note: It is recommended that each laboratory determine its own normal range based on the population.

7) Conclusion:

From the comparison data, we conclude that the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test is substantially equivalent to the Trinity Biotech MarDx *Borrelia burgdorferi* EIA IgG Test kit (predicate device: K894224).

MTTT Comparison:

Comparison with the Predicate Device - MTTT:

The Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test Kit, when used as the first-step or second-step test in combination with the Gold Standard Diagnostics *Borrelia burgdorferi* VlsE-OspC IgG/IgM ELISA Test Kit in the Modified Two-tier Testing (MTTT) method, was compared to the Standard Two-tier testing (STTT) method using the predicates Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA (k200025) Test Kit as the first-step test followed by testing all the positive and equivocal results on the Gold Standard Diagnostics *Borrelia burgdorferi* IgG Blot Test (k113847). Below are tables comparing the two devices.

Similarities		
Item	Subject Device: Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA Test Kit	Predicate Device: Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG Blot (k113847)
Intended Use	<p>The Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA Test Kit is intended as a qualitative test for the detection of IgG antibodies to <i>B. burgdorferi sensu stricto</i> in human serum from symptomatic patients or people suspected of infection. When used as the first-tier screening test, positive and equivocal results must be supplemented through additional testing by one of the following methods:</p> <ul style="list-style-type: none"> ▪Standard two-tier test methodology (STTT) using an IgG blot test following current interpretation guidelines, OR ▪Modified two-tier test methodology (MTTT) using the Gold Standard Diagnostics <i>Borrelia burgdorferi</i> VlsE-OspC IgG/IgM ELISA Test. <p>The assay can also be used as a second-tier confirmation test using the MTTT</p>	<p>The Gold Standard Diagnostics <i>Borrelia burgdorferi</i> B31 IgG Line Blot Test Kit is intended for the qualitative detection of IgG antibodies to <i>B. burgdorferi sensu stricto</i> (B31) in human serum. This test is intended for use in testing human serum samples which have been found positive or equivocal using an ELISA or IFA test procedure to provide supportive evidence of infection with <i>B. burgdorferi</i>.</p>

	methodology when used with the Gold Standard Diagnostics <i>Borrelia burgdorferi</i> VlsE-OspC IgG/IgM ELISA Test as the first-tier screening test. Positive test results by either the STTT or MTTT methodology are supportive evidence for the presence of antibodies and exposure to <i>Borrelia burgdorferi</i> , the cause of Lyme disease. A diagnosis of Lyme disease should be made based on the presence of <i>Borrelia burgdorferi</i> antibodies, history, symptoms, and other laboratory findings.	
Antigens	<i>B. burgdorferi</i> B31 strain,	Same
Sample Matrix	Human serum	Same
Controls Provided	Positive, Cutoff, Negative	Same
Sample Processing	Dilute Samples 1:100	Same
Assay Type	Qualitative	Same

Differences		
Item	Subject Device: Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA Test Kit	Predicate Device: Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG Blot (k113847)
Assay Format	Antigen coated microtiter plate – 96 wells.	Nitrocellulose Strips
Reagents Provided	Diluent, Wash, Conjugate, Substrate, Stop Solution	Diluent/Wash, Conjugate, Substrate
Volumes	100ul sample, 50ul substrate, 50ul stop solution	1500ul sample, 1500ul substrate,
Incubation	15/15/15 minutes at room temperature	30/30/10-13 minutes at room temperature
Interpretation	Optical density readings from Spectrophotometer	Visual
Results Interpretation	Convert to units. Negative <9 Equivocal 9.0-11.0 Positive >11.0	Compare to cutoff band
Reported Results	Positive, Equivocal, Negative	Positive, Negative

Method Comparison MTTT – IgG

The following studies were conducted to determine the performance of the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test as a first-tier or second-tier assay in the modified two-tier testing (MTTT) methodology.

Gold Standard Diagnostics MTTT-IgG ELISA Method Comparison: The Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test was utilized in a MTTT (2-ELISA) protocol with the Gold Standard Diagnostics *Borrelia burgdorferi* VlsE-OspC IgG/IgM ELISA Test. The MTTT (2-ELISA) results were compared to the standard two-tier testing (STTT) using the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA followed by testing all positive and equivocal results on the predicate Gold Standard Diagnostics *Borrelia burgdorferi* IgG blot test.

Prospective Study

Comparison studies were conducted at three sites (one internal and two external reference laboratories) using prospective samples submitted for Lyme serology testing. Four hundred eighty-one (481) serum samples were tested on the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test. A total of 38 positive and equivocal samples were obtained.

In the STTT protocol the samples that were positive or equivocal (n=38) were tested with the predicate *B. burgdorferi* IgG blot test. In the MTTT protocol the samples (n=38) were tested on a second ELISA, the Gold Standard Diagnostics *Borrelia burgdorferi* VlsE-OspC IgG/IgM ELISA Test. In the second-tier ELISA test, positive and equivocal results were considered positive.

The results of the second-tier test of the STTT when compared to the second-tier test of the MTTT, including only the samples that were positive in the first tier, are summarized in the following table:

		Predicate IgG Immunoblot		
		Positive	Negative	Total
Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgG ELISA	Positive	23	15	38
	Negative	0	0	0
	Total	23	15	38

Positive percent agreement = 100.0% 95% CI (85.2% - 100.0%)
 Negative percent agreement = 0.0% 95% CI (0.0% - 21.8%)

The results of the MTTT when compared to the STTT, including all samples that were part of the prospective study (n=481), are summarized in the following table:

		Predicate STTT- IgG		
		Positive	Negative	Total
Gold Standard Diagnostics MTTT- IgG	Positive	23	15	38
	Negative	0	443	443
	Total	23	458	481

Positive percent agreement = 100.0% 95% CI (85.2% - 100.0%)
 Negative percent agreement = 96.7% 95% CI (94.7% - 98.2%)

Sensitivity Study

A sensitivity study was performed on 125 clinically characterized samples. The samples encompass early, disseminated, and late stages of Lyme disease. The samples were tested on both the Gold Standard Diagnostics MTTT-IgG and on the predicate STTT-IgG. The results are summarized in the following table:

Disease Stage	n	Gold Standard Diagnostics MTTT – IgG		Predicate STTT - IgG	
		Positive or Equivocal	% Agreement with Clinical Diagnosis	Positive or Equivocal	% Agreement with Clinical Diagnosis
Early	62	30	48.4%	5	8.1%
Disseminated	22	18	81.8%	5	22.7%
Late	41	40	97.6%	39	95.1%

CDC Reference Panel

A panel of 280 positive and negative specimens from the Centers of Disease Control (CDC) for Lyme disease detection was tested on both the Gold Standard Diagnostics MTTT-IgG and on the predicate STTT-IgG. The results are summarized in the following table:

Disease Stage	n	Gold Standard Diagnostics MTTT-IgG		Predicate STTT- IgG	
		Positive or Equivocal	% Agreement with Clinical Diagnosis	Positive or Equivocal	% Agreement with Clinical Diagnosis
Healthy	100	0	100.0%	0	100.0%
Early Lyme	60	36	60.0%	12	33.3%
Cardiac Lyme	3	2	66.7%	1	33.3%
Neurological Lyme	7	6	85.7%	1	14.3%
Late	20	20	100.0%	20	100.0%
Look-alike Disease*	90	0	100.0%	0	100.0%

*infectious mononucleosis, fibromyalgia, multiple sclerosis, rheumatoid arthritis, syphilis and severe periodontitis

8) Conclusion:

From the comparison data, we conclude that the Gold Standard Diagnostics *Borrelia burgdorferi* IgG ELISA Test is substantially equivalent to the Gold Standard Diagnostics *Borrelia burgdorferi* IgG Blot Test Kit (K113847) when used for the Modified Two-tier Testing (MTTT) Lyme testing.