



March 20, 2020

Beckman Coulter, Inc
Elaine Duncan
Senior Analyst Regulatory Affairs
1584 Enterprise Blvd.
West Sacramento, California 95691

Re: K193536

Trade/Device Name: MicroScan Dried Gram Negative MIC/Combo Panels with Ciprofloxacin (Cp)
(0.004 - 8µg/mL)

Regulation Number: 21 CFR 866.1640

Regulation Name: Antimicrobial susceptibility test powder

Regulatory Class: Class II

Product Code: LTT, JWY, LRG, LTW

Dear Elaine Duncan:

The Food and Drug Administration (FDA) is sending this letter to notify you of an administrative change related to your previous substantial equivalence (SE) determination letter dated March 18, 2020. Specifically, FDA is updating this SE Letter as an administrative correction.

Please note that the 510(k) submission was not re-reviewed. For questions regarding this letter please contact Ribhi Shawar, OHT7: Office of In Vitro Diagnostics and Radiological Health, at 301-796-6698 or Ribhi.Shawar@fda.hhs.gov.

Sincerely,

Ribhi Shawar -S

Ribhi Shawar, Ph.D. (ABMM)

Chief

General Bacteriology and Antimicrobial Susceptibility
Branch

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



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Re: K193536

Trade/Device Name: MicroScan Dried Gram Negative MIC/Combo Panels with Ciprofloxacin (Cp)
(0.004 - 8µg/mL)
Regulation Number: 21 CFR 866.1640
Regulation Name: Antimicrobial Susceptibility Test Powder
Regulatory Class: Class II
Product Code: LTT, JWY, LRG, LTW
Dated: December 18, 2019
Received: December 20, 2019

Dear Elaine Duncan:

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,

Ribhi Shawar -S

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Enclosure

Indications for Use

510(k) Number (if known)

K193536

Device Name

MicroScan Dried Gram-Negative MIC/Combo Panels with Ciprofloxacin (Cp) (0.004 - 8 µg/mL)

Indications for Use (Describe)

The MicroScan Dried Gram-Negative MIC/Combo Panel is used to determine quantitative and/or qualitative antimicrobial agent susceptibility of colonies grown on solid media of rapidly growing aerobic and facultative anaerobic gram-negative bacilli. After inoculation, panels are incubated for 16 – 20 hours at 35°C +/- 1°C in a non-CO₂ incubator, and read either visually or with MicroScan instrumentation, according to the Package Insert.

This particular submission is for updated susceptibility test interpretative criteria for *Enterobacteriaceae* and *Pseudomonas aeruginosa*, as well as expanding *Salmonella* ser.Typhi interpretative criteria to all *Salmonella* spp. for the antimicrobial ciprofloxacin (Cp) at concentrations of 0.004 to 8 µg/mL to the test panel.

Ciprofloxacin has been shown to be active in vitro against most strains of microorganisms listed below, as described in the FDA-approved package insert for this antimicrobial agent.

Active in vitro and in clinical infections against:

Citrobacter koseri
Citrobacter freundii
Enterobacter cloacae
Escherichia coli
Klebsiella pneumoniae
Morganella morganii
Proteus mirabilis
Proteus vulgaris
Providencia rettgeri
Providencia stuartii
Pseudomonas aeruginosa
Salmonella ser.Typhi
Serratia marcescens
Shigella flexneri
Shigella sonnei

Active in vitro but clinical significance unknown:

Enterobacter aerogenes, *Klebsiella oxytoca*, *Salmonella enteritidis*

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) Submission Information:

Device Manufacturer: Beckman Coulter
Contact name: Elaine Duncan, Senior Analyst Regulatory Affairs
Phone: 916-374-3279
Fax: 916-374-2480
Date prepared: December 02, 2019
Product Name: Microdilution Minimum Inhibitory Concentration (MIC) Panels
Trade Name: MicroScan Dried Gram-Negative MIC/Combo Panels with Ciprofloxacin (Cp) (0.004 - 8 µg/mL)
Intended Use: To determine antimicrobial agent susceptibility
Classification: Class II
Product Code: LTT
510(k) Notification: Updated Breakpoints – Ciprofloxacin
Predicate device: MicroScan Dried Gram-Negative MIC/Combo Panels Meropenem – (K192355)

510(k) Summary:

MicroScan Dried Gram-Negative MIC/Combo Panels are designed for use in determining quantitative and/or qualitative antimicrobial agent susceptibility of colonies grown on solid media of rapidly growing aerobic and facultative anaerobic gram-negative bacilli.

The antimicrobial susceptibility tests are miniaturizations of the broth dilution susceptibility test that have been diluted in broth and dehydrated. Various antimicrobial agents are diluted in broth to concentrations bridging the range of clinical interest. Panels are rehydrated with water after inoculation with a standardized suspension of the organism. After incubation in a non-CO₂ incubator for 16-20 hours, the minimum inhibitory concentration (MIC) for the test organism is read by determining the lowest antimicrobial concentration showing inhibition of growth.

The proposed MicroScan Dried Gram-Negative MIC/Combo Panel demonstrated substantially equivalent performance when compared with a CLSI frozen Reference Panel, as defined in the FDA document "Class II Special Controls Guidance Document: Antimicrobial Susceptibility Test (AST) Systems; Guidance for Industry and FDA", dated August 28, 2009. The Premarket Notification (510[k]) presents data in support of the MicroScan Dried Gram-Negative MIC/Combo Panel with ciprofloxacin.

The external evaluations were conducted with fresh, recent and stock Efficacy isolates and stock Challenge strains. The external evaluations were designed to confirm the acceptability of the proposed Dried Gram-Negative Panel by comparing its performance with a CLSI frozen Reference panel. The Dried Gram-Negative Panel inoculated with Prompt[®] and read on the WalkAway instrument demonstrated acceptable performance with an *Enterobacteriaceae* except *Salmonella* spp. Essential Agreement (EA) of 93.9% and Categorical Agreement (CA) of 98.0%, *Enterobacteriaceae* for *Salmonella* spp. EA of 100.0% and CA of 95.2%, and *Pseudomonas aeruginosa* EA of 96.8% and CA of 91.4% for ciprofloxacin when compared with the frozen Reference panel.

Inoculum and instrument reproducibility testing demonstrated acceptable reproducibility and precision with ciprofloxacin, regardless of which inoculum method (i.e., Turbidity or Prompt[®]), or instrument (autoSCAN-4 instrument or WalkAway system) was used.

Quality Control testing demonstrated acceptable results for ciprofloxacin.

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