

March 22, 2021

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

Re: K203295

Trade/Device Name: Gold Standard Diagnostics Borrelia burgdorferi IgM 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 <u>https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems</u>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<u>https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance</u>) and CDRH Learn (<u>https://www.fda.gov/training-and-continuing-education/cdrh-learn</u>). 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 (<u>https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</u>) for more information or contact DICE by email (<u>DICE@fda.hhs.gov</u>) 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)* K203295

Device Name

Gold Standard Diagnostics Borrelia burgdorferi IgM ELISA Test Kit

Indications for Use (Describe)

The Gold Standard Diagnostics Borrelia burgdorferi IgM ELISA Test Kit is intended as a qualitative test for the detection of IgM 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 IgM 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 VIsE-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.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services Food and Drug Administration Office of Chief Information Officer Paperwork Reduction Act (PRA) Staff *PRAStaff@fda.hhs.gov*

"An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number."



510(k) Summary

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

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* IgM 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 IgM ELISA Test Kit (K200023). 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 IgM Test Kit (K894293).
- b. MTTT Gold Standard Diagnostics Borrelia burgdorferi IgM Blot Test Kit (K113846).

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 IgM

antibodies conjugated with horseradish peroxidase is then added, which binds to the antigenantibody 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 IgM 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* IgM ELISA Test Kit is intended as a qualitative test for the detection of IgM 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 IgM 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* IgM ELISA Test kit with the Trinity Biotech MarDx *Borrelia burgdorferi* EIA IgM Test kit (predicate device: K894293).

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

	Test kit is intended as a qualitative presumptive (first step) test for the detection of IgM antibodies to <i>B.</i> <i>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 IgM 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. burdorferi</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. burdorferi</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. burdorferi</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, Absorption 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> IgM ELISA Test Kit	Predicate Device: Trinity Biotech MarDx <i>Borrelia burgdorferi</i> EIA IgM 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 VIsE 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
----------------	---------------

6(b1): Nonclinical Studies:

Determination of the Assay Cutoff

The cutoff was determined by testing a total of 208 normal sera which consisted of 103 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* IgM 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. Each of the panel members was tested in duplicate, twice per day, for 12 days. The sample panel was masked and randomized. The results are summarized in the following table:

Sample	Ν	Mean Units		Within-Run	Between-Run	Between-Day	Total
Moderate	48	20.6	SD	1.234	0.476	0.423	1.222
Positive	40	20.0	CV	6.0%	2.3%	2.1%	5.9%
Low	48	12.4	SD	0.849	0.728	0.405	0.834
Positive	40	12.4	CV	6.9%	5.9%	3.3%	6.7%
High	48	57	SD	0.740	0.495	0.349	0.727
Negative	40	5.7	CV	13.1%	8.7%	6.2%	12.8%
Negative	48	2.5	SD	0.328	0.103	0.061	0.324
negative	40	2.5	CV	13.3%	4.2%	2.5%	13.1%
Positive	48	25.2	SD	1.197	0.337	0.492	1.183
Control	40	23.2	CV	1.3%	1.3%	2.0%	4.7%
Cutoff	48	0.0	SD	0.317	0.238	0.305	0.287
Control	40	9.9	CV	3.2%	2.4%	3.1%	2.9%
Negative	48	0.7	SD	0.124	0.052	0.017	0.123
Control	40	0.7	CV	18.1%	736%	2.5%	17.9%

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 results are summarized in the following table:

Sample	N	Mean Units		Within- Run	Between- Run	Between- Day	Between- Site	Total
Moderate	00	54.4	SD	3.26	1.37	2.49	1.38	3.73
Positive	90	54.4	CV	6.0%	2.5%	4.6%	2.5%	6.9%
Low	0.0	17.1	SD	1.13	0.46	0.98	0.78	1.29
Positive	90	1/.1	CV	6.6%	2.8%	5.7%	4.6%	7.6%
High	0.0	6.5	SD	0.60	0.34	0.48	0.56	0.75
Negative	90	6.5	CV	9.2%	5.2%	7.4%	8.6%	11.4%
Nagativa	00	1.8	SD	0.31	0.25	0.29	0.32	0.34
Negative	90	1.8	CV	17.0%	14.3%	15.9%	17.5%	18.6%
Positive	20	24.2	SD	1.69	1.10	1.28	0.34	1.64
Control	30	24.2	CV	7.0%	7.0%	5.3%	3.5%	6.8%
Cutoff	60	0.0	SD	0.36	0.17	0.22	1.33	0.34
Control	00	9.9	CV	3.6%	1.7%	2.2%	5.5%	3.4%
Negative	30	0.7	SD	0.09	0.03	0.04	0.04	0.72
Control	30	0.7	CV	13.3%	5.1%	5.1%	5.0%	13.1%

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* IgM 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	10	90.5%	

Cross Reactivity

A study using 277 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* IgM ELISA Test. The results are summarized in the following table:

Infection / Diagnosis	Number of Sera Tested	# Positive / (%)
Tick-borne Relapsing Fever IgM	21	0 / (0%)
Treponemal Infections (TPPA)	29	0 / (0%)
Rickettsia IgM	23	0 / (0%)

Ehrlichiosis IgM	10	6 / (60%)*
Babesiosis IgM	16	10 / (63%)*
Leptospirosis IgM	10	8/ (80%)*
H. pylori IgM	10	0 / (0%)
Epstein-Barr Virus IgM	14	0 / (0%)
Varicella Zoster Virus	16	6 / (38%)
Fibromyalgia	25	0 / (0%)
Rheumatoid Arthritis	12	0 / (0%)
Autoimmune Disease	46	0 / (0%)
Multiple Sclerosis	22	0 / (0%)
Severe Periodontitis	23	0 / (0%)

*Also positive on the predicate device

Interfering Substances

The effect of potential interfering substances on samples using the Gold Standard Diagnostics *Borrelia burgdorferi* IgM 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* IgM 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 thirty one (531) serum samples were tested on both the Gold Standard Diagnostics *Borrelia burgdorferi* IgM ELISA Test and on the predicate *B. burgdorferi* IgM ELISA Test. The results are summarized in the following table:

		Predicate IgM ELISA			
		Positive	Equivocal*	Negative	Total
Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgM ELISA Test Kit	Positive	72	9	5	86
	Equivocal*	4	8	5	17
	Negative	1	9	418	428
	Total	77	26	428	531

*Equivocal samples counted as positive

Positive percent agreement = 90.3% ($93/103$)	95% CI (82.9% - 95.5%)
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* IgM ELISA Test and by the Predicate IgM ELISA were tested by a FDA cleared IgM blot assay. The results are summarized in the following table:

	Tier 1 Positive or Equivocal	IgM Blot Positive	IgM Blot Negative
Predicate IgM ELISA	103	59	44
Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgM ELISA Test Kit	103	61	42
Predicate IgM ELISA + Gold Standard Diagnostics <i>Borrelia</i> <i>burgdorferi</i> IgM ELISA Test Kit	93	58	35

Percent Agreement with Predicate Device					
2nd Tier PPA	2nd Tier PPA 98.3% 59/50				
(95% CI) (90.9% - 99.9%) 58/59					

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* IgM ELISA Test and on the predicate *B. burgdorferi* IgM ELISA Test. The results are summarized in the following table:

Disease Stage	n	Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgM ELISA Test Kit	Predicate IgM ELISA
Early	58	75.9% (44/58)	77.6% (45/58)
Disseminated	17	100.0% (17/17)	100.0% (17/17)
Late	39	89.7% (35/39)	84.6% (33/39)

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* IgM 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* IgM ELISA Test with a masked characterized serum panel. The results are summarized in the following table:

Discours Store		Borrelia b	lard Diagnostics <i>urgdorferi</i> IgM A Test Kit	Predicate IgM ELISA		
Disease Stage	n	Positive or Equivocal	% Agreement with Clinical Diagnosis	Positive or Equivocal	% Agreement with Clinical Diagnosis	
Healthy	100	7	93.0%	14	86.0%	
Early Lyme	60	46	76.7%	48	80.0%	
Cardiac Lyme	3	2	66.7%	2	66.7%	
Neurological Lyme	7	7	100.0%	7	100.0%	
Late	20	17	85.0%	17	85.0%	
Look-alike Disease	90	17	81.1%	25	72.2%	

Expected Values

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

	Unit Resu				Qualitative Results	
Population	# Samples	Mean	Range	Std. Dev.	# Positive/ Equivocal	% Positive/ Equivocal
Normal Endemic	103	3.5	0.4. – 10.7	2.341	4	3.9%
Normal Non-Endemic	105	4.2	0.0 - 15.5	3.136	10	9.5%
Prospective Study	531	7.7	0.0 - 76.6	11.742	103	19.4%
Sensitivity Study	114	32.6	0.0 - 81.0	21.138	96	84.2%

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* IgM ELISA Test is substantially equivalent to the Trinity Biotech MarDx *Borrelia burgdorferi* EIA IgM Test kit (predicate device: K894293).

MTTT Comparison:

Comparison with the Predicate Device - MTTT:

The Gold Standard Diagnostics *Borrelia burgdorferi* IgM ELISA Test Kit, when used as the firststep 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* IgM ELISA (k200023) Test Kit as the first-step test followed by testing all the positive and equivocal results on the Gold Standard Diagnostics *Borrelia burgdorferi* IgM Blot Test (k113846). Below are tables comparing the two devices.

	Similarities						
Item	Subject Device: Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgM ELISA Test Kit	Predicate Device: Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgM Blot (k113846)					
Intended Use	The Gold Standard Diagnostics <i>Borrelia</i> <i>burgdorferi</i> IgM ELISA Test Kit is intended as a qualitative test for the detection of IgM antibodies to <i>B</i> . <i>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: •Standard two-tier test methodology (STTT) using an IgM 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. The assay can also be used as a second- tier confirmation test using the MTTT methodology when used with the Gold Standard Diagnostics <i>Borrelia</i>	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> .					

	<i>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	B. burgdorferi 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> IgM ELISA Test Kit	Predicate Device: Gold Standard Diagnostics <i>Borrelia burgdorferi</i> IgM Blot (k113846)			
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 Study – MTTT IgM

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

Gold Standard Diagnostics MTTT-IgM ELISA Method Comparison: The Gold Standard Diagnostics Borrelia burgdorferi IgM 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 IgM ELISA followed by testing all positive and equivocal results on the predicate IgM 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 IgM ELISA Test. A total of 68 positive and equivocal samples were obtained.

In the STTT protocol the samples that were positive or equivocal (n=68) were tested with the predicate B. burgdorferi IgM blot test. In the MTTT protocol the samples (n=68) 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 IgM Immunoble		
		Positive	Negative	Total
Gold Standard Diagnostics	Positive	20	20	40
Borrelia burgdorferi VlsE-	Negative	0	28	28
OspC IgG/IgM ELISA	Total	20	48	68

Positive percent agreement = 100.0%95% CI (83.2% - 100.0%)Negative percent agreement = 58.3%95% CI (43.2% - 72.4%)

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:

	Pred	icate STTT-	IgM	
		Positive	Negative	Total
	Positive	20	20	40
Gold Standard Diagnostics MTTT- IgM	Negative	0	441	441
1/1111-1g//1	Total	20	461	481

Positive percent agreement = 100.0%Negative percent agreement = 95.7% 95% CI (83.2% - 100.0%) 95% CI (93.4% - 97.3%)

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-IgM and on the predicate STTT-IgM. The results are summarized in the following table:

Dimension			Gold Standard Diagnostics MTTT – IgM		edicate T - IgM
Disease Stage	n	Positive % Agreement or with Clinical Equivocal Diagnosis		Positive or Equivocal	% Agreement with Clinical Diagnosis
Early	62	39	62.9%	40	64.5%
Disseminated	22	22	100.0%	22	100.0%
Late	41	34	82.9%	9	22.0%

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-IgM and on the predicate STTT-IgM. The results are summarized in the following table:

Disease Stage	n	Gold Standard Diagnostics MTTT-IgM		Predicate STTT- IgM	
		Positive or Equivocal	% Agreement with Clinical Diagnosis	Positive or Equivocal	% Agreement with Clinical Diagnosis
Healthy	100	0	100.0%	1	99.0%
Early Lyme	60	46	76.7%	30	50.0%
Cardiac Lyme	3	2	66.7%	2	66.7%
Neurological Lyme	7	7	100.0%	7	100.0%
Late	20	16	80.0%	7	35.0%
Look-alike Disease*	90	3	96.7%	2	97.8%

*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* IgM ELISA Test is substantially equivalent to the Gold Standard Diagnostics *Borrelia burgdorferi* IgM Blot Test Kit (K113846) when used for the Modified Two-tier Testing (MTTT) Lyme testing.