

October 16, 2022

Lineus Medical, LLC % Dawn Norman Partner MRC Global, LLC 9085 E Mineral Circle, Suite 110 Centennial, Colorado 80112

Re: K222791

Trade/Device Name: SafeBreak Vascular Regulation Number: 21 CFR 880.5220 Regulation Name: Intravenous Catheter Force-Activated Separation Device Regulatory Class: Class II Product Code: QOI Dated: September 15, 2022 Received: September 15, 2022

Dear Dawn Norman:

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 <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm</a> 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 <u>Federal Register</u>.

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 <a href="https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products">https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products</a>); 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,

Payal Patel
Assistant Director
DHT3C: Division of Drug Delivery and General Hospital Devices, and Human Factors
OHT3: Office of GastroRenal, ObGyn, General Hospital and Urology Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

# Indications for Use

510(k) Number *(if known)* K222791

Device Name SafeBreak® Vascular

#### Indications for Use (Describe)

SafeBreak® Vascular is intended to separate when excessive tension is exerted across a peripheral IV administration set. When SafeBreak® Vascular separates, fluid flow is stopped from the infusion pump and blood flow is stopped from the patient's IV catheter. SafeBreak® Vascular is intended to aid in reduction of peripheral IV mechanical complications requiring IV replacement. SafeBreak® Vascular is intended to be used on peripheral IV catheters in adults and adolescent populations eighteen (18) years of age and older receiving intermittent or continuous infusions with an electronic pump.

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 K222791

Date Prepared:	October 14, 2022
Company:	Lineus Medical 179 North Church Ave, Suite 202 Fayetteville, AR 72701
Primary Contact:	Dawn Norman, MS Partner, MRC Global Phone: 618-604-3064 Dawn.Norman@askmrcglobal.com
Company Contact:	Vance Clement Chief Executive Officer Lineus Medical Phone: 901-351-9270 vance@lineusmed.com
Trade Name: Common Name:	SafeBreak <sup>®</sup> Vascular Intravenous Catheter Force-Activated Separation Device
Classification: Regulation Number: Panel: Product Code:	Class II 21 CFR 880.5220 General Hospital QOI
Primary Predicate:	K212064, Orchid SRV™ Manufacturer: Linear Health Sciences, LLC

## **Device Description:**

SafeBreak<sup>®</sup> Vascular is placed in-line with an intravenous catheter and an intravascular administration set, including any administration set accessories. It separates into two parts when a specified force is applied. The device has been shown to reduce the risk of IV catheter failure(s) requiring IV catheter replacement. When SafeBreak<sup>®</sup> Vascular separates, fluid flow is stopped from the infusion pump and blood flow is stopped from the patient's IV catheter.

SafeBreak<sup>®</sup> Vascular is provided sterilized by Ethylene Oxide. The product is single use only and is not designed for reprocessing or re-sterilization by the user.

The purpose of this special 510(k) is to expand the separation force tolerance of SafeBreak<sup>®</sup> Vascular to 1-5 lbf.

#### Indications for Use:

SafeBreak<sup>®</sup> Vascular is intended to separate when excessive tension is exerted across a peripheral IV administration set. When SafeBreak<sup>®</sup> Vascular separates, fluid flow is stopped from the infusion pump and blood flow is stopped from the patient's IV catheter. SafeBreak<sup>®</sup> Vascular is intended to aid in reduction of peripheral IV mechanical complications requiring IV replacement. SafeBreak<sup>®</sup> Vascular is intended to be used on peripheral IV catheters in adults and adolescent populations eighteen (18) years of age and older receiving intermittent or continuous infusions with an electronic pump.

#### Substantial Equivalence:

The subject SafeBreak<sup>®</sup> Vascular is intended to separate when excessive tension is exerted across a peripheral IV administration set. The separation force tolerance of SafeBreak<sup>®</sup> Vascular is being expanded to 1-5 lbf. The subject SafeBreak<sup>®</sup> Vascular is intended to aid in reduction in peripheral IV mechanical complications requiring IV replacement. The subject SafeBreak<sup>®</sup> Vascular has the same intended use, same or similar materials, same or similar technological characteristics, the same operating principle, as the predicate device.

The safety and effectiveness of the subject and predicate devices have been verified and validated and are substantially equivalent. Thus, it can be concluded that the subject SafeBreak<sup>®</sup> Vascular does not raise different questions about safety and effectiveness.

Device Comparison					
	K222791	K212064	Assessment of Differences		
	Subject	Predicate			
Indications for Use	SafeBreak® Vascular is intended to aid in reduction of peripheral IV mechanical complications requiring IV replacement. SafeBreak® Vascular is intended to be used on peripheral IV catheters in adults and adolescent populations eighteen (18) years of age and older receiving intermittent or continuous infusions with an electronic pump.	The Orchid SRV <sup>™</sup> can be used during intermittent infusion and continuous infusion. The Orchid SRVTM is intended to aid in reduction of peripheral IV mechanical complications requiring IV replacement. The Orchid SRVTM is for use with patients eighteen (18) years of age and older.	The subject and predicate devices have similar indications for use. Both devices are intended to reduce dislodgement during IV infusion. Both devices are intended to be used on peripheral IV catheters or infusions or intermittent or continuous infusions with an electronic pump. The indicated patient population for subject and predicate devices is the same (18 year of age and older). Thus, the indications for use for the subject, predicate device are substantially equivalent.		
Materials	<ul> <li>Makrolon</li> <li>Polycarbonate</li> <li>Saint-Gobain</li> <li>INEOS ABS Lustran</li> <li>Silicone</li> </ul>	Polycarbonate and silicone	Subject and predicate materials are similar.		
Separation force	1 - 5 lbf	1-4.2 lbf	The change in tolerance of the subject device separation force does not raise different questions of safety or effectiveness; Substantially Equivalent		
Environment of Use	Hospital	Hospital	Identical; Substantially Equivalent		
Principle of Operation	The subject SafeBreak Vascular connects to the needleless	The Orchid Safety Release Valve™ has luer lock	The principle of operation for the subject and predicate devices is the		

## **Device Comparison**

	K222791	K212064	Assessment of Differences
	Subject	Predicate	
	connector found in the existing IV extension set and to the existing IV administration set via luer connectors. Upon installation of the SafeBreak Vascular, infusion can occur. Upon tension the SafeBreak Vascular separates and the valve on each end of the device closes, stopping flow.	connections that will lock the device in place during use. The female luer connects to an administration set while the male luer connects to a vascular access device hub or extension set. Once connected the device allows for continuous flow. The Orchid SRV will separate into the male and female subassemblies, upon a tension event, automatically closing the flow path, while maintaining sterility and preventing fluid leakage form the device.	same; Substantially Equivalent
Vascular Access Type	Peripheral intravenous catheter	Peripheral intravenous catheter	Identical; Substantially Equivalent
For Use with Electronic Pump	Yes	Yes	Identical; Substantially Equivalent
Single Use	Yes	Yes	Identical; Substantially Equivalent
Continuous and Intermittent Infusion	Yes	Yes	Identical; Substantially Equivalent

## **Performance Testing:**

Mechanical testing (i.e., Separation Force Testing) of the SafeBreak<sup>®</sup> Vascular supports the safety and effectiveness of the expansion of the pull force range in the subject device.

## **Conclusion:**

The subject SafeBreak<sup>®</sup> Vascular device has a similar intended use, materials, technological characteristics, and operating principle compared to the predicate device. In addition, performance testing and engineering analysis support the expansion of the separation force specification. The subject and predicate devices are both intended to aid in reduction of the occurrence of dislodgement, the difference in technology does not affect the safety and effectiveness of the subject device. Therefore, it can be concluded that the subject device is substantially equivalent to the predicate devices.