EMERGENCY USE AUTHORIZATION (EUA) SUMMARY
EVERLYWELL COVID-19 TEST HOME COLLECTION KIT DTC

For *In vitro* Diagnostic Use
For use under Emergency Use Authorization (EUA) only

Direct to consumer (DTC) home self-collected anterior nasal swabs collected by individuals 18 or older (unobserved) with the Everlywell COVID-19 Test Home Collection Kit DTC will be sent to High Complexity Laboratories that have been designated by Everlywell. All laboratories will be certified under the Clinical Laboratory Improvement Amendments of 1988 (CLIA), 42 U.S.C. §263a to perform high complexity tests and that run the specimens collected from the Everlywell COVID-19 Test Home Collection Kit DTC on an in vitro diagnostic (IVD) molecular test that is indicated for use with the Everlywell COVID-19 Test Home Collection Kit DTC for self-collection of anterior nasal swab specimens.

INTENDED USE

The Everlywell COVID-19 Test Home Collection Kit DTC is a direct to consumer product for self-collecting an individual anterior nasal swab (nasal) specimens by individuals 18 or older at home and sending that specimen for testing with an in vitro diagnostic (IVD) molecular test that is indicated for use with the Everlywell COVID-19 Test Home Collection Kit DTC for self-collection of anterior nasal swab specimens, that is indicated for testing any individuals, including individuals without symptoms or other reasons to suspect COVID-19 and has been issued an EUA for use with Home Collection Kits, that includes the Everlywell COVID-19 Test Home Collection Kit DTC.

Testing is limited to laboratories designated by Everlywell that are certified under the Clinical Laboratory Improvement Amendments of 1988 (CLIA), 42 U.S.C. §263a, and meet the requirements to perform high complexity tests.

All test results are delivered to the user via an online portal. Individuals with positive or invalid/indeterminate results will be contacted by a healthcare provider. The direct to consumer home collection system is intended to enable users to access information about their COVID-19 infection status that could aid with determining if self-isolation or quarantine is appropriate and to assist with healthcare decisions after discussion with a healthcare provider.

The Everlywell COVID-19 Test Home Collection Kit DTC is for use by adults 18 years and older, to self-collect anterior nasal swab specimens, including for use by such individuals without symptoms or other reasons to suspect COVID-19.

The Everlywell COVID-19 Test Home Collection Kit DTC is not a substitute for visits to a healthcare provider. The information provided by this kit when combined with an authorized test should not be used to start, stop, or change any course of treatment unless advised by your healthcare provider.

The Everlywell COVID-19 Test Home Collection Kit DTC is only for use under the Food and Drug Administration's Emergency Use Authorization.

DEVICE DESCRIPTION AND TEST PRINCIPLE

The Everlywell COVID-19 Test Home Collection Kit DTC will be available direct to consumer (DTC) without a prescription at physical retail locations and online direct to consumer for any individual 18 years and older. When ordering a kit online, individuals must verify they are 18 years or older. Individuals are recommended to complete a screening questionnaire when registering their kit. All test results are then delivered to the user via an online portal. Additionally, individuals with positive and invalid results are contacted by a healthcare provider. For purposes of this EUA, a healthcare provider includes any healthcare professional with prescribing abilities including, but not limited to, physicians, nurses, pharmacists, technologists, laboratory directors, and epidemiologists. The healthcare provider contacting individuals with test results will have prescribing privileges for that individual, should medication be indicated for treatment.

The Everlywell COVID-19 Test Home Collection Kit DTC is composed of sample registration instructions, sample collection instructions, Fact Sheet for Individuals, sample preparation and shipping instructions, anterior nasal swab, saline in a tube, shipping materials, and return labels. Instructions are included in the kit to direct the home users on how to appropriately collect the nasal swab specimen and place it in the saline transport tube, how to properly package the specimen, and how to mail the specimen back to the laboratory using the pre-labeled FedEx or UPS return envelope. Each Everlywell COVID-19 Test Home Collection Kit DTC is intended to be returned via overnight courier service at ambient conditions on the same day or the following day of sample collection in accordance with the standards as put forth by the CDC and WHO for the transport of suspected COVID-19 samples.

Specimens received at the clinical laboratory for testing will undergo review and accessioning prior to acceptance for testing. See Accessioning SOP for details.

The COVID-19 RT-PCR test will be performed at a High Complexity certified laboratory (Clinical Laboratory Improvement Amendments of 1988(CLIA), 42 U.S.C. §263a using an FDA authorized NAAT test per the Instructions for Use.

REAGENTS AND MATERIALS

Everlywell COVID-19 Test Home Collection Kit DTC

POLY MAILER 7.5 X 10.5
2D BARCODE LABEL
NASAL SWAB (round foam or flocked)
TRANSPORT MEDIUM KIT (0.85% saline)
KIT ID STICKERS

RETURN BOX
UN3373 LABEL (pre-applied to return materials)
MEDIUM ALCOHOL PREP PAD
ABSORBENT SHEET
SMALL BIOHAZARD BAG
INNER BOX TRAY 1-3
HELP AND CONTACT NUMBER INSERT
SHIPPING AND PREPARATION INSTRUCTIONS
SELF-COLLECTION INSTRUCTIONS
FACT SHEET FOR INDIVIDUALS
WELCOME PANEL WITH KIT ID
WHITE TRAY
RETURN SHIPPING LABEL

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INSPECTION OF SPECIMENS:
Applies to specimens received from individuals using home collection kit
Specimen received through the Everlywell COVID-19 Test Home Collection Kit DTC should be checked for the following criteria before entering the work flow:

- **Improper return of sample packaging -** sample not returned in supplied packing materials; sample not returned in biohazard bag; sample not in correct collection/transport device or tube; insufficient volume/ or leak/dry tube
- **Not Registered** - customer did not register kit on EW platform
- **QNS** - customer did not provide enough specimen for processing
- **Missing Information** - customer did not write name, date of birth, or date of collection on the specimen
- **Incorrect Name** - name on the requisition does not match what is written on specimen
- **Invalid Date** - DOB on the requisition does not match what is written on the specimen or the date of collection that is written on specimen is either in the future or exceeded expiration
- **Other** - any other error that requires Everlywell review; these are typically rare events, often associated with other extenuating factors.
- **Wrong Lab –** customer mixed up return shipping labels and specimen arrived at the incorrect lab for processing
- **Missing Barcode –** customer received replacement materials at home and forgot to write the Kit ID on the new specimen

CONTROLS TO BE USED WITH THE COVID-19 RT-PCR TEST

Testing is limited to laboratories designated by Everlywell that are certified under CLIA, 42 U.S.C. §263a, and meet the requirements to perform high complexity tests. Testing is limited to laboratories using a rRT-PCR test for the qualitative detection of nucleic acid from SARS-CoV-2 that is authorized for testing individuals without symptoms or other reasons to suspect COVID-19 and has been issued an EUA for use with Home Collection Kits, that includes the Everlywell COVID-19 Test Home Collection Kit DTC. The test should incorporate the following controls:

1) A negative (no template) control is needed to eliminate the possibility of sample contamination on the assay run and is used on every assay plate. This control is molecular grade, nuclease-free water.

2) A positive template control is needed to verify that the assay run is performing as intended and is used on every assay plate starting at master mix addition at a concentration of 50 copies/uL. The positive template control does not include RNase P target and will result as "undetermined" for that marker.

3) An internal control targeting RNase P is needed to verify that nucleic acid is present in every sample and is used for every sample processed. This also serves as the extraction control to ensure that samples resulting as negative contain nucleic acid for testing.

4) A negative extraction control (optional) is a previously characterized negative patient sample. It serves both as a negative extraction control to monitor for any cross-contamination that occurs during the extraction process, as well as an extraction control to validate extraction reagents and successful RNA extraction.

INTERPRETATION OF RESULTS

All test controls must be examined prior to interpretation of patient results. If the controls are not valid, the patient results cannot be interpreted.

Everlywell currently has a contract with Physicians Wellness Network (PWN). PWN's protocol provides for real-time communication throughout the testing process, including when the individual is waiting for the test kit, while the individual is waiting for results, and after the result is provided. Educational materials include information on maintaining social distancing or isolation, monitoring for severe symptoms, and seeking care when necessary and adheres to both CDC and HHS guidelines. Patient care coordinators, other healthcare professionals, and physicians are available at all times throughout this process for questions/concerns.

COVID-19 test results are divided into "Reactive" (positive/detected), "Non-reactive" (negative/not detected), and "Invalid" (no result, indeterminate). PWN makes phone calls and outreach attempts as soon as possible after a positive or invalid result is reported in order to speak to the individual and provide education and additional information.

In the case of positive results:

- Individuals will receive a result reporting call and a letter in the case that they cannot be reached
- Call and outreach attempts will be made promptly from the time of receiving the test results
- Outreach calls provide: result of the test, counseling on the disease and next steps based on immediate symptoms including isolation vs in-person or emergency care, and the opportunity to have a telehealth consult with a physician or trained healthcare provider licensed in the state of where the individual is located
- Results are reported by PWN to public health agencies as required

Additionally, physician or trained healthcare provider consultations are available to anyone who requests one regardless of test result. All individuals have the opportunity to follow up with the Physician or trained healthcare provider with regards to what to watch for, specific symptoms, self-quarantine questions as appropriate, and when to seek care with necessary parameters provided.

PERFORMANCE EVALUATION

1) Everlywell COVID-19 Test Home Collection Kit DTC Sample Stability Studies:

The stability study described below was conducted by Quantigen Biosciences, with support from The Gates Foundation and UnitedHealth Group. Quantigen Biosciences has granted a right of reference to any sponsor wishing to pursue an EUA to leverage their COVID-19 swab stability data as part of that sponsor's EUA request.

Two SARS-CoV-2-positive pools (2xLoD and 10xLoD) were contrived by combining SARS-CoV-2-negative human/porcine matrix with previously confirmed, high-positive patient samples.

The 2xLoD and 10xLoD pools were added directly to swabs through a procedure that mimics a nasal swabbing action: swabs were submerged into a reservoir of either 2xLoD or 10xLoD mixture and "abraded" against the side of the (Eppendorf style) tube while the viral solution absorbs into the swab (whether foam or polyester). The 20 low-positive samples and the 10 intermediate-positive samples used with each test condition did *not* come from individual patients. Rather, for each of the two concentrations, a *single* preparation of virus + media or virus + matrix was prepared, from which technical replicates were prepared.

The human/porcine negative matrix swabs were prepared by spiking them into negative porcine nasal mucous using the same procedure described above. Swabs were then placed into 1 mL saline.

Samples were tested using an EUA authorized assay at time 0, 30 hours, and 54 hours post incubation. Samples were held at 40℃ for 12 hours, then 32℃ for 18 or 42 hours, respectively. Samples were allowed to equilibrate to room temperature for 2 hours before testing.

The acceptance criteria laid out for the study was a 95% agreement or greater for positives samples. Both time points met this criteria and supported sample shipping stability, using a drop box, with over-night or 48 hour shipping.

Average Ct Values for Each time point for both sample dilutions.

Swab	Time Point	N	Internal Control	Target 1	Target 2	Target 3
2xLoD swab in Saline	0h	5	23.74	32.23	30.03	31.80

10xLoD swab in Saline	0h	5	23.27	29.46	27.58	28.67
2xLoD swab in Saline	30h	20	26.00	32.69	31.33	34.59
10xLoD swab in Saline	30h	10	26.19	29.54	28.37	28.69
2xLoD swab in Saline	54h	20	25.70	32.03	31.09	32.10
10xLoD swab in Saline	54h	10	26.11	28.73	27.25	25.09

The stability study described below was conducted by Assurance Scientific Laboratories. Assurance Scientific Laboratories has granted a right of reference to Everlywell to leverage their COVID-19 swab stability data, under winter conditions.

Assurance conducted the winter stability to confirm that low temperatures do not cause sample degradation. Replicates for the study were made by diluting clinical samples into negative clinical matrix. Flocked nylon nasal swabs were used in the study. Because there are no known clinically impactful differences between virus absorption onto and release from spun polyester versus flocked nylon nasal swabs into saline, FDA has determined that the Assurance data for flocked nylon swabs can be leveraged to support use of spun polyester nasal swabs in saline (0.9%).

See winter conditions in the table below.

Simulated Winter Shipping Conditions

Storage Temperature	Time at Storage Temp (hours)	Total Time (hours)
N/A	0	0
-10°C	8	8
18°C	4	12
-10°C	2	14
10°C	36	50
-10°C	6	56

All samples provided the expected results, meeting the stated study acceptance criteria of ≥95% agreement for low positive samples and (2x LoD) 100% agreement for high positive samples (10x LoD). Study results are summarized in the table below. This data supports stability for 48-hour shipping.

Winter Sample Shipping and Stability Study

			Mean Ct Values			
			N1		**RNase P**	
	N	**Positives**	**Initial**	**Post**	**Initial**	**Post**
Negative	10	0/10	N/D	N/D	26.07	25.71
2x LoD	28	28/28	34.68	33.04	26.08	25.85
10x LoD	10	10/10	29.75	29.03	26.73	26.87

N/D – Not Detected

2) Home Collection Kit Stability

Saline Tube (Reagent) Stability

The saline tubes used in the Everlywell COVID-19 Test Home Collection Kit DTC are sourced from Teknova. The specific product used, catalog # 4S0085, is FDA registered and has an established shelf life of 3 years (1095 days). The product is made in Class 5 hoods, filtered using 0.1 µm filters, and tested for sterility (acceptance criteria for sterility is 0 CFU). Tubes from each lot are tested for pH, conductivity, density, sodium chloride concentration.

3) Self-Collection Validation:

For every new test Everlywell launches, they conduct pre-release usability testing where they confirm comprehension of the collection experience including online and written instructions. In the course of product development, Everlywell conducts ongoing user research. This involves proactive in-depth interviews of customers who have recently completed a test to discuss their experience in an attempt to discover potential improvements. They have conducted at least 20 usability studies in the past 12 months with over 150 unique participants. They review and use this information to inform areas where users are confused by language and graphics and change those areas to become more understandable.

Everlywell has four years of experience in developing and implementing instructions for at-home collection and shipping for a variety of sample types, including swab collection for hundreds of thousands of test results. Everlywell closely monitors user error rates and sample receipt/accessioning issues for all tests using standardized procedures. The data below is representative of registered swab collection kits, containing similar instructions as the Everlywell COVID-19 home collection kit, that were returned to lab successfully from Sept 28, 2017 to April 1, 2020:

Kit A = 964/1,016 = 94.8%
Kit B = 5,300/5,608 = 94.5%

At launch of the Everlywell COVID-19 Test Home Collection Kit DTC, Everlywell monitored the user error rate and implemented a usability assessment to identify and characterize user success with at-home collection of samples. Based upon previous experience, the acceptance criteria were established to be 10% for error rate type and 90% success as thresholds for implementing corrective actions (e.g. modifications to user instructions). Corrective action will be undertaken in the event a specific error rate type exceeds the criterion or if the success rate falls below the user success acceptance criteria.

Data from these studies is summarized below.

Of the 205 kits that were returned to the laboratory between May 29 – June 12, 2020, 194 were returned without any errors; 11 were returned with errors for a user success rate of 94.63%. The most frequent errors observed were quantity not sufficient (6/205 or 2.93%) and incorrect name on specimen tube (4 /205 or 1.95%).

For the usability assessment, complete responses were submitted by 48 individuals. The average usability index score across all responses in the questionnaire was 94.44%, which exceeds the acceptance criteria of ≥90%.

All predetermined acceptance criteria were met, and no corrective actions were required.

The Everlywell COVID-19 Test Home Collection Kit DTC has demonstrated sample stability and usability that is acceptable to the FDA.

WARNINGS:

- This product has not been FDA cleared or approved, but, has been authorized by FDA under an Emergency Use Authorization (EUA).
- This product has been authorized only for the home collection and maintenance of anterior nasal swab specimens as an aid in detection of nucleic acid from SARS-CoV-2, not for any other viruses or pathogens.
- The emergency use of this product is only authorized for the duration of the declaration that circumstances exist justifying the authorization of emergency use of medical devices under Section 564(b)(1) of the Federal Food, Drug and Cosmetic Act, 21 U.S.C. § 360bbb-3(b)(1), unless the declaration is terminated or authorization is revoked sooner.