

April 12, 2021

Lora J. Bean, PhD
Senior Director, Laboratory Quality Assurance,
Clinical Laboratory Director
PerkinElmer Genomics
250 Industry Drive
Pittsburgh, PA 15275

Device: PerkinElmer SARS-CoV-2 RT-qPCR Reagent Kit
EUA Number: EUA202494
Company: PerkinElmer Genomics
Indication: This test is authorized for the following indications for use:
Qualitative detection of nucleic acid from SARS-CoV-2 in oropharyngeal and nasopharyngeal swab specimens from individuals suspected of COVID-19 by their healthcare provider
This test is also for use with anterior nasal swab specimens that are collected using the Everlywell COVID-19 Test Home Collection Kit when used consistent with its authorization.
Emergency use of this test is limited to the authorized laboratory.
Authorized Laboratory: Testing is limited to PerkinElmer Genomics, 250 Industry Drive, Pittsburgh, PA (PKIG) which is certified under the Clinical Laboratory Improvement Amendments of 1988 (CLIA), 42 U.S.C. §263a, and meets requirements to perform high complexity tests.

Dear Dr. Bean:

This letter is in response to your¹ request that the Food and Drug Administration (FDA) issue an Emergency Use Authorization (EUA) for emergency use of your product,² pursuant to Section 564 of the Federal Food, Drug, and Cosmetic Act (the Act) (21 U.S.C. §360bbb-3).

On February 4, 2020, pursuant to Section 564(b)(1)(C) of the Act, the Secretary of the Department of Health and Human Services (HHS) determined that there is a public health emergency that has a significant potential to affect national security or the health and security of

¹ For ease of reference, this letter will use the term “you” and related terms to refer to PerkinElmer Genomics.

² For ease of reference, this letter will use the term “your product” to refer to the PerkinElmer SARS-CoV-2 RT-qPCR Reagent Kit used for the indication identified above.

United States citizens living abroad, and that involves the virus that causes COVID-19. Pursuant to Section 564 of the Act, and on the basis of such determination, the Secretary of HHS then declared that circumstances exist justifying the authorization of emergency use of in vitro diagnostics for detection and/or diagnosis of the virus that causes COVID-19 subject to the terms of any authorization issued under Section 564(a) of the Act.³

FDA considered the totality of scientific information available in authorizing the emergency use of your product for the indication above. A summary of the performance information FDA relied upon is contained in the EUA Summary (identified below).

Having concluded that the criteria for issuance of this authorization under Section 564(c) of the Act are met, I am authorizing the emergency use of your product, described in the Scope of Authorization of this letter (Section II), subject to the terms of this authorization.

I. Criteria for Issuance of Authorization

I have concluded that the emergency use of your product meets the criteria for issuance of an authorization under Section 564(c) of the Act, because I have concluded that:

1. The SARS-CoV-2 can cause a serious or life-threatening disease or condition, including severe respiratory illness, to humans infected by this virus;
2. Based on the totality of scientific evidence available to FDA, it is reasonable to believe that your product may be effective in diagnosing COVID-19, and that the known and potential benefits of your product when used for diagnosing COVID-19, outweigh the known and potential risks of your product; and
3. There is no adequate, approved, and available alternative to the emergency use of your product.⁴

II. Scope of Authorization

I have concluded, pursuant to Section 564(d)(1) of the Act, that the scope of this authorization is limited to the indication above.

Authorized Product Details

Your product is a qualitative test for the detection of nucleic acid from SARS-CoV-2 in oropharyngeal and nasopharyngeal swab specimens from individuals suspected of COVID-19 by their healthcare provider. This test is also for use with anterior nasal swab specimens that are collected using the Everlywell COVID-19 Test Home Collection Kit when used consistent with its authorization. Testing is limited to PerkinElmer Genomics, 250 Industry Drive, Pittsburgh,

³ U.S. Department of Health and Human Services, *Determination of a Public Health Emergency and Declaration that Circumstances Exist Justifying Authorizations Pursuant to Section 564(b) of the Federal Food, Drug, and Cosmetic Act*, 21 U.S.C. § 360bbb-3. 85 FR 7316 (February 7, 2020).

⁴ No other criteria of issuance have been prescribed by regulation under Section 564(c)(4) of the Act.

PA (PKIG) which is certified under CLIA, 42 U.S.C. §263a, and meets requirements to perform high complexity tests.

The SARS-CoV-2 RNA is generally detectable in upper respiratory specimens during the acute phase of infection. Positive results are indicative of the presence of SARS-CoV-2 nucleic acid; clinical correlation with patient history and other diagnostic information is necessary to determine patient infection status. Positive results do not rule out bacterial infection or co-infection with other viruses. Negative results do not preclude SARS-CoV-2 infection and should not be used as the sole basis for patient management decisions. Negative results must be combined with clinical observations, patient history, and epidemiological information.

To use your product, SARS-CoV-2 nucleic acid is first extracted, isolated and purified from authorized specimens, using authorized extraction methods described in the authorized labeling. The purified nucleic acid is then reverse transcribed into cDNA followed by PCR amplification and detection using an authorized real-time (RT) PCR instrument described in the authorized labeling. The PerkinElmer SARS-CoV-2 RT-qPCR Reagent Kit includes the following materials or other authorized materials: CoV2 Reagent A, CoV2 Enzyme Mix, CoV2 Positive Control, and CoV2 Negative Control.

The product uses all commercially sourced materials or other authorized materials and authorized ancillary reagents commonly used in clinical laboratories as described in the authorized labeling.

Your product requires the following control materials, or other authorized control materials (as may be requested under Condition K below), that are processed in the same way as the patient specimens and are required to be included with each batch of specimens tested with your product. All controls listed below must generate expected results in order for a test to be considered valid, as outlined in the authorized labeling:

- Internal Control - A primer/probe set detecting RNase P is included in the reaction mix to monitor the processes from nucleic acid extraction to fluorescence detection.
- Positive Control - A plasmid containing SARS-CoV-2 target sequences. The positive control is included in each extraction plate to ensure the reagents and instruments are performing optimally.
- Negative Control - Nuclease-free water provided in the PerkinElmer SARS-CoV-2 RT-qPCR Reagent Kit. The negative control is added during the extraction step to every assay plate to monitor contamination during the extraction step.

The above described product is authorized to be accompanied by the EUA Summary (available at <https://www.fda.gov/medical-devices/coronavirus-disease-2019-covid-19-emergency-use-authorizations-medical-devices/vitro-diagnostics-euas>), as well as the PerkinElmer SARS-CoV-2 RT-qPCR Reagent Kit Laboratory Procedure Manual and the following Fact Sheets pertaining to the emergency use, which is required to be made available to healthcare providers and patients:

- Fact Sheet for Healthcare Providers: PerkinElmer Genomics - PerkinElmer SARS-CoV-2 RT-qPCR Reagent Kit

- Fact Sheet for Patients: PerkinElmer Genomics - PerkinElmer SARS-CoV-2 RT-qPCR Reagent Kit

The above described product, when accompanied by the PerkinElmer SARS-CoV-2 RT-qPCR Reagent Kit Laboratory Procedure Manual, the EUA Summary (identified above), and the two Fact Sheets (collectively referenced as “authorized labeling”) is authorized to be used under this EUA, despite the fact that it does not meet certain requirements otherwise required by applicable federal law.

I have concluded, pursuant to Section 564(d)(2) of the Act, that it is reasonable to believe that the known and potential benefits of your product, when used consistent with the Scope of Authorization of this letter (Section II), outweigh the known and potential risks of your product.

I have concluded, pursuant to Section 564(d)(3) of the Act, based on the totality of scientific evidence available to FDA, that it is reasonable to believe that your product may be effective in diagnosing COVID-19, when used consistent with the Scope of Authorization of this letter (Section II), pursuant to Section 564(c)(2)(A) of the Act.

FDA has reviewed the scientific information available to FDA, including the information supporting the conclusions described in Section I above, and concludes that your product (as described in the Scope of Authorization of this letter (Section II)) meets the criteria set forth in Section 564(c) of the Act concerning safety and potential effectiveness.

The emergency use of your product under this EUA must be consistent with, and may not exceed, the terms of this letter, including the Scope of Authorization (Section II) and the Conditions of Authorization (Section IV). Subject to the terms of this EUA and under the circumstances set forth in the Secretary of HHS's determination under Section 564(b)(1)(C) of the Act described above and the Secretary of HHS's corresponding declaration under Section 564(b)(1) of the Act, your product is authorized for the indication above.

III. Waiver of Certain Requirements

I am waiving the following requirements for your product during the duration of this EUA:

- Current good manufacturing practice requirements, including the quality system requirements under 21 CFR Part 820 with respect to the design, manufacture, packaging, labeling, and storage of your product.

IV. Conditions of Authorization

Pursuant to Section 564(e) of the Act, I am establishing the following conditions on this authorization:

PerkinElmer Genomics (You)

- A. Your product must comply with the following labeling requirements pursuant to FDA regulations: the intended use statement (21 CFR 809.10(a)(2), (b)(2)); adequate directions for use (21 U.S.C. 352(f)), (21 CFR 809.10(b)(5), (7), and (8)); appropriate limitations on the use of the device including information required under 21 CFR 809.10(a)(4); and any available information regarding performance of the device, including requirements under 21 CFR 809.10(b)(12).
- B. You must inform relevant public health authorities of this EUA, including the terms and conditions herein, and any updates made to your product and authorized labeling.
- C. You must notify the relevant public health authorities of your intent to run your product.
- D. You must have a process in place for reporting test results to healthcare providers and relevant public health authorities, as appropriate.
- E. You must include with test result reports, all authorized Fact Sheets. Under exigent circumstances, other appropriate methods for disseminating these Fact Sheets may be used, which may include mass media.
- F. You must make available on your website(s), if applicable, the Fact Sheet for Healthcare Providers and the Fact Sheet for Patients.
- G. You are authorized to make available additional information relating to the emergency use of your product that is consistent with, and does not exceed, the terms of this letter of authorization.
- H. You must use your product as outlined in the authorized labeling. Deviations from the authorized laboratory procedures, including the authorized instruments, authorized extraction methods, authorized clinical specimen types, authorized control materials, authorized other ancillary reagents and/or authorized materials required to use your product are not permitted.
- I. When testing anterior nasal swab specimens collected using the Everlywell COVID-19 Test Home Collection Kit, you must follow the specimen accessioning protocols provided with the collection kit when accepting specimens for testing.
- J. You must collect information on the performance of your product and report to the Division of Microbiology (DMD)/Office of Health Technology 7 (OHT7)-Office of In Vitro Diagnostics and Radiological Health (OIR)/Office of Product Evaluation and Quality (OPEQ)/Center for Devices and Radiological Health (CDRH) (via email: CDRH-EUA-Reporting@fda.hhs.gov) any suspected occurrence of false positive or false negative results and significant deviations from the established performance characteristics of your product of which they become aware.
- K. You may request changes to this EUA for your product, including to the Scope of Authorization (Section II in this letter) or to the authorized labeling. Such requests

should be submitted to the DMD/OHT7-OIR/OPEQ/CDRH and require appropriate authorization from FDA prior to implementation.

- L. You must evaluate the analytical limit of detection and assess traceability of your product with any FDA-recommended reference material(s), if requested by FDA.⁵ After submission to FDA and DMD/OHT7-OIR/OPEQ/CDRH's review of and concurrence with the data, FDA will update the EUA summary to reflect the additional testing.
- M. You must submit to FDA a summary report within 30 calendar days of authorization summarizing the results of any testing performed using anterior nasal specimens collected with the Everlywell COVID-19 Test Home Collection Kit during that timeframe, including how many specimens were received, how many specimens had to be rejected during accession and the main reasons for rejection, and the positivity rate for specimens collected with the authorized collection kit.
- N. You must have a process in place to track adverse events, including any occurrence of false results with your product and report any such events to FDA pursuant to 21 CFR Part 803.
- O. You must additionally track adverse events associated with the use of the Everlywell COVID-19 Test Home Collection Kit, including occurrences of false results, and report to FDA in accordance with 21 CFR Part 803. Serious adverse events, especially unexpected biosafety concerns, should immediately be reported to DMD/OHT7-OIR/OPEQ/CDRH (via email: CDRH-EUA-Reporting@fda.hhs.gov).
- P. All laboratory personnel using your product must be appropriately trained in RT-PCR and molecular techniques and use appropriate laboratory and personal protective equipment when handling this kit, and use your product in accordance with the authorized labeling.
- Q. You must ensure that any records associated with this EUA are maintained until otherwise notified by FDA. Such records must be made available to FDA for inspection upon request.

Conditions Related to Printed Materials, Advertising and Promotion

- R. All descriptive printed matter, advertising, and promotional materials relating to the use of your product shall be consistent with the authorized labeling, as well as the terms set forth in this EUA and meet the requirements set forth in section 502(a), (q)(1), and (r) of the Act and FDA implementing regulations.

⁵ Traceability refers to tracing analytical sensitivity/reactivity back to an FDA-recommended reference material. FDA may request, for example, that you perform this study in the event that we receive reports of adverse events concerning your product.

- S. No descriptive printed matter, advertising, or promotional materials relating to the use of your product may represent or suggest that this test is safe or effective for the detection of SARS-CoV-2.
- T. All descriptive printed matter, advertising, and promotional materials relating to the use of your product shall clearly and conspicuously state that:
- This test has not been FDA cleared or approved, but has been authorized for emergency use by FDA under an EUA for use by the authorized laboratory;
 - This test has been authorized only for the detection of nucleic acid from SARS-CoV-2, not for any other viruses or pathogens; and
 - The emergency use of this test is only authorized for the duration of the declaration that circumstances exist justifying the authorization of emergency use of in vitro diagnostics for detection and/or diagnosis of COVID-19 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.

The emergency use of your product as described in this letter of authorization must comply with the conditions and all other terms of this authorization.

V. Duration of Authorization

This EUA will be effective until the declaration that circumstances exist justifying the authorization of the emergency use of in vitro diagnostics for detection and/or diagnosis of COVID-19 is terminated under Section 564(b)(2) of the Act or the EUA is revoked under Section 564(g) of the Act.

Sincerely,

RADM Denise M. Hinton
Chief Scientist
Food and Drug Administration

Enclosure