

**Classification of Acupressure Devices
FDA Questions**

Neurological Devices Panel of the Medical Devices Advisory Committee June 3-4, 2021

1. FDA has identified the following risks to health for acupressure devices:

Identified Risk	Description/Examples
Pain or discomfort	This can result from bruising, swelling and tenderness under the wrist band and at the pressure point, particularly if applied too tightly.
Skin irritation	This can result from improper cleaning and from pressure/contact with the wrist band.

Please comment on whether you agree with inclusion of all the risks in the overall risk assessment of acupressure devices under product code “MVV”. In addition, please comment on whether you believe that any additional risks should be included in the overall risk assessment of these acupressure devices.

2. Section 513 of the Food, Drug, and Cosmetic Act states a device should be Class III if:
- insufficient information exists to determine that general controls are sufficient to provide reasonable assurance of its safety and effectiveness or that application of special controls would provide such assurance, AND
 - if, in addition, the device is life-supporting or life-sustaining, or for a use which is of substantial importance in preventing impairment of human health, or if the device presents a potential unreasonable risk of illness or injury.

A device should be Class II if:

- general controls by themselves are insufficient to provide reasonable assurance of the safety and effectiveness, AND
- there is sufficient information to establish special controls to provide such assurance.

A device should be Class I if:

- general controls are sufficient to provide reasonable assurance of the safety and effectiveness, OR
- insufficient information exists to:
 - determine that general controls are sufficient to provide reasonable assurance of the safety and effectiveness, OR

- establish special controls to provide such assurance, BUT
 - I. is not purported or represented to be for a use in supporting or sustaining human life or for a use which is of substantial importance in preventing impairment of human health, and
 - II. does not present a potential unreasonable risk of illness or injury.

FDA does not believe that special controls will be required for acupressure devices under product code “MVV” and that general controls will be sufficient to provide a reasonable assurance of the safety and effectiveness for acupressure devices. As such, FDA believes that Class I is the appropriate classification for acupressure devices under product code “MVV.”

Please discuss whether you agree with FDA’s proposed classification of Class I with general controls for acupressure devices under product code “MVV.” If you do not agree with FDA’s proposed classification, please provide your rationale for recommending a different classification.