

**510(k) Summary for  
AQUIOS STEM SYSTEM with AQUIOS CL Flow Cytometer**

**510(k) Owner / Submitter Information**

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**Proposed Device  
Information**

Trade Name: **AQUIOS CL Flow Cytometer**  
Common Name: AQUIOS CL  
Classification Name: Automated differential cell counter (21 CFR 864.5220)  
Classification: Class II  
Product Code: OYE  
Panel: Hematology

Trade Name: **AQUIOS STEM Software**  
Common Name: AQUIOS STEM Software  
Classification Name: Automated differential cell counter (21 CFR 864.5220)  
Classification: Class II  
Product Code: OYE  
Panel: Hematology

Trade Name: **AQUIOS STEM Kit**  
Common Name: AQUIOS STEM Kit  
Classification Name: Automated differential cell counter (21 CFR 864.5220)  
Classification: Class II  
Product Code: OYE  
Panel: Hematology

Trade Name: **AQUIOS STEM CD34 Control Cells**  
Common Name: AQUIOS STEM Control Cells Level 1 and Level 2  
Classification Name: Hematology quality control mixture (21 CFR 864.8625)  
Classification: Class II Exempt, based on regulation 21 CFR 864.8625 which states that Quality Control materials are now exempt from premarket notification subject to the limitations under 21 CFR 862.9  
Product Code: JPK  
Panel: Hematology

## Predicate Device Information

Manufacturer	Predicate	510(k) Number	Product Code	Classification
Beckman Coulter Inc	Stem-Kit Reagent	BK210639 BK040032	GKZ**	Class II (864.5220) Automated differential cell counter
	FC500 Flow cytometer	K182886	GKZ**	
	AQUIOS CL Flow Cytometer	K141932	OYE	
	stemCXP software	BK210639 BK040055	GKZ**	
	Stem-Trol control cells	BK040032	JPK*	Class II Exempt (864.8625) Hematology Quality Control Mixture

\* Based on regulation 21 CFR 864.8625 which states that Quality Control materials are exempt from premarket notification subject to the limitations under 21 CFR 862.9.

\*\* GKZ was the product code for flow cytometer, reagents, controls and software until new product code OYE which is specific to Flow Cytometric products was established.

## Device Description

The AQUIOS CL Flow Cytometry System is composed of the following components:

- AQUIOS CL Flow Cytometer
- AQUIOS STEM Software
- AQUIOS STEM Kit Reagent Kit
- AQUIOS STEM CD34 Control Cells

The AQUIOS CL Flow Cytometer is intended for use with in vitro diagnostic flow cytometric applications using up to four fluorescent detection channels using a blue (488 nm) laser, two light scatter detection channels, and electronic volume (EV).

AQUIOS STEM Kit contains the following reagents:

- AQUIOS STEM Kit CD45-FITC / CD34-PE – 2 vials
- AQUIOS STEM Kit CD45-FITC / IsoClonic Control-PE – 1 vial
- AQUIOS STEM Kit 7-AAD Viability Dye – 3 vials
- AQUIOS STEM Kit Lysing Solution – 3 vials
- AQUIOS STEM Kit STEM-Count Fluorospheres – 2 vials

The AQUIOS STEM Kit is designed to identify human hematopoietic stem and progenitor cells (HPC) using the following criteria: “True CD34+ cells (a) express CD34 antigen, (b) express CD45 antigen with staining intensity characteristic of blast cells (i.e., readily detectable but at lower levels than lymphocytes and

monocytes), and (c) exhibit low side-angle and low to intermediate forward angle light scatter characteristics of blast cells”. Exclusion of dead CD34+ HPC from viable CD34+ HPC enumeration is achieved using the 7-AAD Viability Dye.

The AQUIOS STEM Software is designed for the AQUIOS CL flow cytometer. It includes the algorithms and test definitions that provide automated analysis and results using AQUIOS STEM reagents. AQUIOS STEM Software automatically generates gates and regions based on ISHAGE Guidelines to identify populations of interest. The software enables enumeration of Viable CD34+ and CD45+ cell count based on the identified population of interest and AQUIOS STEM-Count Fluorophore counts.

The AQUIOS Flow Cytometry System also offers an optional standalone offline workstation. This workstation is identical to the workstation that is physically connected to the instrument and can be used for off-line analysis of results generated by the AQUIOS CL Flow Cytometer with AQUIOS STEM Kit reagents and AQUIOS STEM software according to the product labeling.

### **Intended Use:**

#### AQUIOS CL Flow Cytometer

The AQUIOS CL Flow Cytometer is intended for use with in vitro diagnostic flow cytometric applications using up to four fluorescent detection channels using a blue (488 nm) laser, two light scatter detection channels, and electronic volume (EV).

AQUIOS Flow Cytometry Software may be run on an independent computer workstation for offline analysis of results generated by the AQUIOS CL Flow Cytometer with its monoclonal antibody reagents. The offline analysis must be performed in accordance with the product labeling.

#### AQUIOS STEM Kit

The AQUIOS STEM Kit is an in vitro diagnostic medical device intended to be used by laboratory professionals for the simultaneous identification and enumeration of percent (%) CD34+ cell population, CD34+ cells/  $\mu\text{L}$ , and CD45+ cells/  $\mu\text{L}$  in fresh peripheral or mobilized peripheral whole blood, fresh or thawed bone marrow, fresh or thawed apheresis products, and fresh or thawed cord blood on the automated AQUIOS CL Flow Cytometry System.

#### AQUIOS STEM CD34 Control Cells

AQUIOS STEM CD34 Control Cells Level 1 and Level 2 are in vitro diagnostic medical devices intended to be used by laboratory professionals as process controls for the verification of the parameters CD34 and CD45 as part of the AQUIOS STEM System on the automated AQUIOS CL Flow Cytometry System.

AQUIOS STEM CD34 Control Cells are liquid preparations of stabilized human leukocytes (lymphocytes, monocytes, and granulocytes) and erythrocytes that have lysing, light scatter, antigen expression, and antibody staining properties representative of those found in human whole blood specimens.

The kit contains 2 levels of CD34 positive cell controls with approximately 10 CD34+ cells/ $\mu$ L (level 1) and approximately 30 CD34+ cells/ $\mu$ L (level 2) that are processed in the same manner as whole blood. This allows verification of application performance. AQUIOS STEM CD34 Control Cells Level 1 and Level 2 are quantitative controls used in combination with the AQUIOS STEM Kit as part of the AQUIOS STEM System.

**Substantial Equivalence Comparison between Subject and Predicate Devices**

In this submission, AQUIOS STEM Kit System with AQUIOS CL Flow Cytometer (subject device) is compared with Stem Kit Reagents and stemCXP system with the FC500 Flow Cytometer (predicate device). A comparison of the similarities and differences between the subject device and the predicate device is presented in Table 1.

**Table 1 Comparison Between Subject and Predicate Device**

	Predicate	Subject Device	Comments
Characteristic	Stem Kit Reagents and stemCXP system with the FC500 Flow Cytometer	AQUIOS STEM Kit System with AQUIOS CL Flow Cytometer	
Intended Use	<p>Stem-Kit Reagents consist of a two-color fluorescent (FITC, PE) murine monoclonal antibody reagent, a two-color murine fluorescent (FITC, PE) isoclonic control, an absolute count reagent, a cell viability reagent, and a lysing reagent. It is intended “For In Vitro Diagnostic Use” for the simultaneous identification and enumeration of CD45+ and dual-positive CD45+ CD34+ cell population percentages and absolute counts in biological specimens by flow cytometry. Biological specimens include fresh normal or mobilized peripheral whole blood, and fresh or thawed apheresis products, cord blood and bone marrow. Cell population measurements may be obtained using either an automated method or a manual method for gating and analysis on the FC500.</p> <p>Refer to this Stem-Kit Reagents package insert for complete instructions if using the manual method. Refer to the stemCXP System Guide provided with the stemCXP 2.0 software kit and stemCXP version 2.0, WIN 7 for complete instructions if using the automated method.</p>	<p>The AQUIOS STEM Kit is an in vitro diagnostic medical device intended to be used by laboratory professionals for the simultaneous identification and enumeration of percent (%) CD34+ cell population, CD34+ cells/ <math>\mu\text{L}</math>, and CD45+ cells/ <math>\mu\text{L}</math> in fresh peripheral or mobilized peripheral whole blood, fresh or thawed bone marrow, fresh or thawed apheresis products, and fresh or thawed cord blood on the automated AQUIOS CL Flow Cytometry System.</p>	<p>Subject Device intended use reflects the use of AQUIOS STEM system on AQUIOS CL flow cytometer. Rest of the intended use is updated for clarity. Context of use remains the same.</p>
Device Classification	Stem CXP System on FC500 Flow Cytometer: Class II, 864.5220	AQUIOS CL Flow Cytometer System: Class II, 864.5220	Same

	Predicate	Subject Device	Comments
<b>Characteristic</b>	<b>Stem Kit Reagents and stemCXP system with the FC500 Flow Cytometer</b>	<b>AQUIOS STEM Kit System with AQUIOS CL Flow Cytometer</b>	
	Stem-Kit Reagent: Class II, 864.5220 Stem-Trol Cells: 21 CFR 864.8625	AQUIOS STEM Kit: Class II, 864.5220 AQUIOS STEM Control Cells: 21 CFR 864.8625	
Product Code	Stem CXP System on FC500 Flow Cytometer: GKZ Stem-Kit Reagent: GKZ Stem-Trol Cells: JPK	AQUIOS CL Flow Cytometer System: OYE AQUIOS STEM Kit: OYE AQUIOS STEM Control Cells: JPK	GKZ was the product code for flow cytometer, reagents, controls and software until new product code OYE which is specific to Flow Cytometric products was established.
<b>Instrument Similarities and Differences</b>			
Sample Analysis	<ul style="list-style-type: none"> <li>Principle of analysis – Flow cytometry</li> <li>Detection hardware – Lasers, fluidics, optics, electronics</li> <li>Sample analysis pathway</li> </ul>	Same	Same
Optics	Laser light delivered by mirrors, prisms, and lenses	Same	Same
Workstation	Software functionality to allow – <ul style="list-style-type: none"> <li>Patient data management – storage, review, reporting to LIS</li> <li>Control data management – storage, review, reporting</li> <li>System configuration management</li> <li>System service test and adjustment procedures</li> </ul>	Same	Same
System Configuration	FC500 System with PC-based workstation running stemCXP application-specific software	AQUIOS System with Reagent Cart and All-in-One Touch Screen Computer loaded with AQUIOS System Software, Database, and AQUIOS STEM Software	Substantially Equivalent
Operating System	Microsoft Windows 7	Microsoft Windows 10	Substantially Equivalent
Controlling software	CXP System Software	AQUIOS System Software	Substantially Equivalent

	Predicate	Subject Device	Comments
Characteristic	Stem Kit Reagents and stemCXP system with the FC500 Flow Cytometer	AQUIOS STEM Kit System with AQUIOS CL Flow Cytometer	
Lasers	Blue – 488 nm argon ion Laser	Blue – 488 nm Blue Laser	Substantially Equivalent
Optics	FC500 flow cell Laser light delivered by mirrors, prisms, and lenses. Emitted light delivered by mirrors	AQUIOS flow cell Laser light delivered by mirrors, prisms, and lenses. Emitted light delivered by mirrors	Substantially Equivalent
Sample Preparation	Manual	Automated On-board	Substantially Equivalent
Specimen Introduction	Manual	Specimens are loaded in the Autoloader using cassettes / or the single loader as single specimen tubes	Substantially Equivalent
Prepared Sample Introduction	Single 12X75 mm test tubes	96 well plate	Substantially Equivalent
Specimen Identification	Manual entry into Worklist	Barcode – positive sample identification or manual entry	Substantially Equivalent
Prepared Sample Identification	Worklist and Carousel position	Software tracked by well position.	Substantially Equivalent
Standardization	<ul style="list-style-type: none"> <li>• Automatic voltage/gain adjustments</li> <li>• Compensation matrix calculation</li> </ul>	A verification check of standardization is performed with Flow Check and controls	Substantially Equivalent
Sample Analysis	<ul style="list-style-type: none"> <li>• Principle of analysis – Flow cytometric Detection hardware: Lasers, fluidics, optics, electronics. Sample analysis pathway: Manual gating of cellular populations per instrument IFU or <b>stemCXP</b> automated gating of cellular populations based on the ISHAGE gating strategy</li> </ul>	<u>Same</u> <ul style="list-style-type: none"> <li>• Principle of analysis - Flow cytometric Detection hardware: Lasers, fluidics, optics, electronics. Sample analysis pathway: Automated gating of cellular population by <b>AQUIOS STEM System Software</b>. The software only allows gates/region readjustments by the user. Based on the ISHAGE gating strategy</li> </ul>	Same
Count Method	Cellular events are compared to Stem Count Fluorospheres events. Automated method: Absolute counts are determined by FC500 stemCXP	<u>Same</u> Absolute counts are determined by AQUIOS STEM Software	Same

	Predicate	Subject Device	Comments
Characteristic	Stem Kit Reagents and stemCXP system with the FC500 Flow Cytometer	AQUIOS STEM Kit System with AQUIOS CL Flow Cytometer	
Photomultiplier Tubes (PMTs) / Colors	<ul style="list-style-type: none"> <li>• Forward Scatter – Solid state detector</li> <li>• Side Scatter Detector – photodiode</li> <li>• 4 Fluorescent Detectors –Photomultipliers <ul style="list-style-type: none"> <li>○ 525nm BP Filter</li> <li>○ 575nm BP Filter</li> <li>○ 620nm BP Filter</li> <li>○ 675nm BP Filter</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• FS Solid State Detector</li> <li>• SS Solid State Detector – (488LP Dichroic)</li> <li>• 4 Fluorescent Detectors <ul style="list-style-type: none"> <li>○ 525nm BP Filter</li> <li>○ 575nm BP Filter</li> <li>○ 620nm BP Filter</li> <li>○ 675nm BP Filter</li> </ul> </li> </ul>	Substantially Equivalent
Detectors/Parameters	Six (FS, SS, FL1-FL4)	Seven (EV, FS, SS, FL1 – FL4)	Substantially Equivalent
Off-line analysis software	Analysis of Listmode files with stemCXP	Stand-alone workstations with AQUIOS STEM Software to review data offline	Substantially Equivalent
<b>Reagent and Controls Similarities and differences</b>			
Reagent Form	Liquid form	Same Liquid form	Same
Storage Conditions	2 – 8 °C	Same except for lysing solution storage 2 – 8 °C Lysing solution to be stored at 18-25°C upon receipt	Substantially Equivalent
Set-up Reagents Standardization	Flow Set	Set at installation by Service. Requires only standardization verification via the AQUIOS STEM Controls.	Substantially Equivalent
Verification of Optical alignment and fluidics	Flow Check Fluorospheres	Same Flow Check Fluorospheres	Same
Control cell assay parameter	One Control Level: Positive	Two Control Levels	Substantially Equivalent
Reagent Assay	Stem Reagent Kit: <ul style="list-style-type: none"> <li>• CD45-FITC / CD34-PE</li> <li>• CD45-FITC / IsoClonic Control-PE</li> <li>• Stem-Count Fluorospheres.</li> <li>• 7-AAD Viability Dye</li> <li>• 10X NH4Cl Lysing Solution</li> </ul>	Same except for lysing solution AQUIOS STEM Reagent Kit: <ul style="list-style-type: none"> <li>• AQUIOS STEM Kit CD45-FITC / CD34-PE</li> <li>• AQUIOS STEM Kit CD45-FITC / IsoClonic Control-PE</li> </ul>	Substantially Equivalent



	Predicate	Subject Device	Comments
<b>Characteristic</b>	<b>Stem Kit Reagents and stemCXP system with the FC500 Flow Cytometer</b>	<b>AQUIOS STEM Kit System with AQUIOS CL Flow Cytometer</b>	
		<ul style="list-style-type: none"> <li>• AQUIOS STEM Kit STEM-Count Fluorospheres</li> <li>• AQUIOS STEM Kit 7-AAD Viability Dye</li> <li>• AQUIOS STEM Kit Lysing Solution</li> </ul>	
Clones	Specificity CD45 CD34 Clone J33 581	Same Specificity CD45 CD34 Clone J33 581	Same
Sample Preparation with Monoclonal Antibodies	Manually prepared by pipetting and adding specimen to reagents, incubating, lysing, adding Fluorospheres	On-Board Automated Preparation of the same steps as the predicate.	Substantially Equivalent
Lyse Reagents	Ammonium Chloride NH4CL	AQUIOS STEM Kit Lysing Solution	
Reagents for Color Compensation	Quick Comp 2	Set at installation by Service and verified with the AQUIOS STEM control cells	Substantially Equivalent
Closed Vial Reagent Stability	365 Days	325 Days	Substantially Equivalent
Open Vial Reagent Stability Claim	30 Days	75 Days	Substantially Equivalent
On Board Stability	N/A	70 Hours	N/A
Specimen Stability	<ul style="list-style-type: none"> <li>• Whole Blood, and Mobilized Whole Blood - 20 hours at room temperature (18 - 25°C)</li> <li>• Cord Blood - 24 hours at room temperature (18 - 25°C)</li> <li>• Apheresis products and Bone Marrow - 24 hours at 2- 8°C</li> </ul>	<ul style="list-style-type: none"> <li>• Whole Blood, Mobilized Whole Blood, and Cord Blood - 24 hours at room temperature (18 - 25°C)</li> <li>• Bone Marrow and Apheresis 24 hours at 2- 8°C</li> </ul>	Substantially Equivalent
Prepared Specimen Stability	<ul style="list-style-type: none"> <li>• 60 minutes on ice after the addition of Stem Count Fluorospheres for Apheresis, Cord Blood, Bone Marrow Samples</li> <li>• 45 minutes on ice after the addition of Stem Count Fluorospheres for Whole Blood and Mobilized Whole Blood</li> </ul>	Prepared Specimen Stability not applicable. After Lyse incubation of 15 - 20 minutes, the AQUIOS STEM Fluorospheres are added, and the sample is immediately analyzed	N/A
<b>Software Similarities and differences</b>			
System Configuration	FC500 System with PC-based workstation running stemCXP application-specific software	AQUIOS System with Reagent Cart and All-in-One Touch Screen Computer workstation running AQUIOS STEM application-specific software	Substantially Equivalent

	Predicate	Subject Device	Comments
Characteristic	Stem Kit Reagents and stemCXP system with the FC500 Flow Cytometer	AQUIOS STEM Kit System with AQUIOS CL Flow Cytometer	
Operating System	Microsoft Windows WIN7	Microsoft Windows WIN10	Substantially Equivalent
Programming Language	C++	C# VB.Net	Substantially Equivalent
Workstation Interface	USB to fiber optic	USB to Serial	Substantially Equivalent
Data Acquisition	Digital Pulse Processing	<u>SAME</u>	Same
General	Software functionality to allow: <ul style="list-style-type: none"> <li>• Patient data management – storage, review, reporting</li> <li>• Control data management – storage, review, reporting</li> <li>• System configuration management</li> </ul> System service test and adjustment procedures.	<u>SAME</u>	Same
Data Processing	<ul style="list-style-type: none"> <li>• Region/gates evaluation</li> <li>• Statistics generation</li> </ul> Export of results to MS Excel/PDFfile	<u>SAME</u>	Same
Standardization	<ul style="list-style-type: none"> <li>• Automatic voltage/gain adjustments</li> </ul>	Automatic gain calibration using target value	Substantially Equivalent
User interface	<ul style="list-style-type: none"> <li>• Plots and reports</li> </ul>	<u>SAME</u>	Same
Control Software	<ul style="list-style-type: none"> <li>• The FC500 acquisition software enables the user to acquire data from the cytometer and to analyze, display, print and export acquired listmode data. The embedded software resides in the FC500 instrument. It controls the instrument functionality including the multi-carousel loader (MCL) for sample introduction.</li> <li>• The embedded software controls the instruments' lasers, acquisition system and fluidics. The instrument fluidics aspirates the sample and performs instrument maintenance functions such as startup/shutdown. The embedded software also captures and provides the data to the workstation for processing.</li> </ul>	<ul style="list-style-type: none"> <li>• The Aquios software enables the user to acquire data from the Aquios flow cytometer instrument and to analyze, display, print and export acquired fcs file.</li> <li>• The Aquios software controls the instrument functionality including the cassettes multi-loader for sample introduction.</li> <li>• The Aquios software controls the instruments' lasers, acquisition system and fluidics. The instrument fluidics aspirates the sample and performs instrument maintenance functions such as startup/shutdown.</li> </ul>	Substantially Equivalent

	Predicate	Subject Device	Comments
Characteristic	Stem Kit Reagents and stemCXP system with the FC500 Flow Cytometer	AQUIOS STEM Kit System with AQUIOS CL Flow Cytometer	
		The Aquios Software also captures and provides the data to the workstation for processing.	
Data Processing	<ul style="list-style-type: none"> <li>• Region and Gate processing</li> <li>• Statistics Generation</li> <li>• Export to Excel</li> <li>○ Incoming data stream formatted into per-parameter vectors for improved performance of lin/log data transformations and compensation calculations</li> </ul>	SAME	Same
User Account Control	<ul style="list-style-type: none"> <li>• Multiple role assignments <ul style="list-style-type: none"> <li>• User account information stored in password protected database.</li> </ul> </li> </ul>	SAME	Same
Report generator	<ul style="list-style-type: none"> <li>• Panel reports &amp; QC</li> </ul>	<u>SAME</u>	Same

**Summary of AQUIOS CL Flow Cytometer Performance Testing**

Study	Testing Approach	FDA Guidance Documents	Standards/ References	Testing Results
Instrument Linearity	Verify fluorescence detection is linear using standard AQUIOS CL settings.	None	None	Linearity of fluorescence measurements was demonstrated.
Laser Performance Characteristics	Verify stability of the laser performance of the AQUIOS CL flow cytometer over time.	None	None	Analysis of the data collected demonstrates that the AQUIOS CL laser performance is stable over time.
Instrument Carryover	To verify instrument carryover using SPHERO AccuCount Ultra-Rainbow Fluorescent Particles meets performance specifications.	Special Controls Guidance Document: Premarket Notifications for Automated Differential Cell Counters for Immature or Abnormal Blood Cells - Carryover (Section 12)	CLSI H26-A2; FDA Standards Recognition #7-210	Analysis of the data collected demonstrates that the AQUIOS CL meets the whole blood carryover performance requirements.

**Summary of AQUIOS STEM Kit Reagents Characterization and Analytical Testing:**

Study	Objective	FDA Guidance Documents	Standards/ References	Testing Results
Antibody Specificity	Identify specific antibody clones used for the manufacturing of the AQUIOS STEM Kit Reagents.	None	None	Specific antibody clones that are used in the AQUIOS STEM Kit Reagents are identified.
Dose Titration	Determine the optimal dose (in µg/test) of each antibody conjugates and nucleic acid DNA dye 7AAD used in AQUIOS STEM Reagent Kit	None	None	Optimal dosage for antibody conjugates and 7-AAD determined.

Study	Objective	FDA Guidance Documents	Standards/ References	Testing Results
Antibody Staining and Lyse incubation Range	Verify the acceptable performance of varying antibody reagent and lyse incubation times on the AQUIOS CL Flow Cytometry System when processing multiple samples in parallel.	None	None	Acceptable staining and lyse incubation times verified.
Frozen specimen handling	Define the maximum time between the thawing of a frozen sample and the sample processing with the AQUIOS STEM SYSTEM on the AQUIOS CL Flow Cytometer	None	None	The study established the maximum time between the thawing of a frozen sample and the sample processing with the AQUIOS STEM system.
Lot to Lot Reproducibility - Reagent	Verify acceptable variability of multiple lots of AQUIOS STEM Kit	None	CLSI EP05-A3, Evaluation of Precision Performance of Quantitative Measurement Methods; Approved Guideline – Third Edition. FDA Standards Recognition #7-251	Analysis of the data collected demonstrates that the AQUIOS STEM Kit reagents have acceptable lot variability performance.
Lot to Lot Reproducibility – Control Cells	Verify acceptable variability of multiple lots of AQUIOS STEM CD34 Control Cells	None	CLSI EP05-A3, Evaluation of Precision Performance of Quantitative Measurement Methods; Approved Guideline – Third Edition. FDA Standards Recognition #7-251	Analysis of the data collected demonstrates that the AQUIOS STEM CD34 Control Cells have acceptable lot variability performance.
Reagent Stability	Demonstrate the shelf life of the AQUIOS STEM Kit reagents.	None	CLSI EP25-A – Evaluation of Stability of In Vitro Diagnostic Reagents. Approved Guideline. FDA Standards Recognition #7-235	Analysis of the data collected demonstrates that the AQUIOS STEM Kit reagents meet performance requirements in support of the product’s stability claims.

Study	Objective	FDA Guidance Documents	Standards/ References	Testing Results
Interference	Determine the impact of interfering substances on the results from AQUIOS STEM SYSTEM.	None	CLSI EP07 Edition A3: Interference testing in clinical chemistry. Third edition. April 2018. FDA Recognition Number 7-275  CLSI EP37: Supplemental Tables for interference testing in clinical chemistry, 1st edition- April 2018. FDA Recognition Number 7-284	Impact of interfering substances on AQUIOS STEM SYSTEM results determined.
Analytical Measuring Interval	Establish the Analytical Measuring Interval for the AQUIOS STEM Kit reagents when analyzed on the AQUIOS CL Flow Cytometry system.	None	<ul style="list-style-type: none"> <li>• CLSI EP17-A2. Evaluation of the detection capability for clinical laboratory measurement procedures. Approved guideline. FDA Recognition Number 7-233</li> <li>• CLSI EP-06 Ed2 Nov 2020 Evaluation of Linearity of Quantitative Procedures: Approved Guideline. FDA Recognition Number 7-306</li> </ul>	Analytical Measuring Intervals for each of the markers in AQUIOS STEM SYSTEM have been established for use with the AQUIOS CL flow cytometer.

**Summary of AQUIOS STEM Kit System Performance Testing:**

Study	Testing Approach	FDA Guidance Documents	Standards/ References	Testing Results
Assay Linearity	Verify the linear range of absolute count of CD34+ cells/ $\mu$ L and the absolute count of CD45+/ $\mu$ L using the AQUIOS STEM Kit reagents on	Special Controls Guidance Document: Premarket Notifications for Automated Differential Cell Counters for	CLSI EP-06 Ed2 Nov 2020 Evaluation of Linearity of Quantitative Procedures: Approved Guideline. FDA Recognition Number 7-306	Analysis of the data collected demonstrates that the AQUIOS STEM SYSTEM on AQUIOS CL Flow Cytometer meets the linearity performance requirements.

Study	Testing Approach	FDA Guidance Documents	Standards/ References	Testing Results
	the AQUIOS CL flow cytometer.	Immature or Abnormal Blood Cells - Linearity (Section 11)		
Assay Carryover – Specimen and Reagent	Verify carryover of specimens and reagents on the AQUIOS CL meets performance specifications.	Special Controls Guidance Document: Premarket Notifications for Automated Differential Cell Counters for Immature or Abnormal Blood Cells - Carryover (Section 12)	CLSI H26-A2 Validation, Verification, and Quality Assurance of Automated Hematology Analyzers, Approved Standard - 2nd Edition; June 2010; FDA Standards Recognition # 7-210  ICSH Guideline Clin Lab Haematol, 16(2):157-174, 1994	Analysis of the data collected demonstrates that the AQUIOS STEM SYSTEM meets carryover performance requirements.
Detection Capability	To establish and verify Limit of Blank (LoB), Lower Limit of Detection (LLoD), Lower Limit of Quantitation (LLoQ) for the AQUIOS STEM Kit reagents when analyzed on the AQUIOS CL instrument.	None	CLSI EP17-A2 Evaluation of Detection Capability for Clinical Laboratory Measurement Procedures; Approved Guideline – Second Edition; FDA Standards Recognition #7-233	Analysis of the data collected established the Limit of Blank, Limit of Detection, and Limit of Quantitation values for each AQUIOS STEM Kit reagent when evaluated on the AQUIOS CL Flow Cytometry System for Detection Capability.
Specimen Age Stability and Acceptable Lyse Incubation Duration	Stability of various specimens was evaluated to verify specimen and acceptable lyse incubation duration.	Special Controls Guidance Document: Premarket Notifications for Automated Differential Cell Counters for Immature or Abnormal Blood Cells - Specimens (Section 13)	ICSH Guideline: Am J Clin Path, 100(4)371-372, 1993.	Analysis of the data collected demonstrates that the AQUIOS STEM SYSTEM when analyzed on the AQUIOS CL meet the requirements for specimen and lyse incubation duration.
Anticoagulant Equivalency	Demonstrate the equivalent performance of whole blood, mobilized peripheral whole blood, bone marrow, apheresis product, and cord blood specimens when collected in different anticoagulants K2EDTA, K3EDTA, Heparin,	Special Controls Guidance Document: Premarket Notifications for Automated Differential Cell Counters for Immature or Abnormal Blood Cells - Accuracy (Section 8)	CLSI EP09c: Measurement Procedure Comparison and Bias Estimation Using Patient Samples - Third Edition. FDA Standards Recognition 7-296	Analysis of the data collected demonstrated equivalence of performance of various clinical specimens across anti coagulants when processed with AQUIOS STEM SYSTEM on AQUIOS CL Flow Cytometer.

Study	Testing Approach	FDA Guidance Documents	Standards/ References	Testing Results
	Heparin/ACD-A mix, ACD-A, and CPD when processed with the AQUIOS STEM Kit on the AQUIOS CL instrument.			
AQUIOS STEM Test Option equivalency study	Demonstrate the equivalent performance of AQUIOS STEM system in enumerating viable CD34+ cells/ $\mu$ L, percent (%) CD34+ and the count of viable CD45+ cells/ $\mu$ L when the samples are processed across these AQUIOS STEM system analysis options.	None	CLSI EP09c: Measurement Procedure Comparison and Bias Estimation Using Patient Samples - Third Edition	Equivalent performance of the three AQUIOS STEM system analysis options demonstrated.
Precision Study using Control Material	Demonstrate system precision for total CD45+ cells/ $\mu$ L, total CD34+ cells/ $\mu$ L and total percent (%) CD34+ using control material as a surrogate for a stabilized sample	Special Controls Guidance Document: Premarket Notifications for Automated Differential Cell Counters for Immature or Abnormal Blood Cells - Precision (Section 9)	CLSI EP5-A3, Evaluation of Precision Performance of Quantitative Measurement Methods; Approved Guideline – Third Edition.  FDA Standard Recognition # 7-251	Analysis of the data collected demonstrates that the AQUIOS STEM SYSTEM on AQUIOS CL meets performance requirements for repeatability and reproducibility using control material.
Precision Study using Clinical Specimens (Specimen Repeatability)	Demonstrate assay precision for viable CD45+ cells/ $\mu$ L, viable CD34+ cells/ $\mu$ L and viable percent (%) CD34+ using clinical specimens	Special Controls Guidance Document: Premarket Notifications for Automated Differential Cell Counters for Immature or Abnormal Blood Cells - Precision (Section 9)	CLSI H26-A2 Validation, Verification, and Quality Assurance of Automated Hematology Analyzers, Approved Standard – 2nd Edition; June 2010; FDA Standards Recognition # 7-210	Analysis of the data collected demonstrates that the AQUIOS STEM SYSTEM on AQUIOS CL meets repeatability performance requirements for clinical specimens.



Study	Testing Approach	FDA Guidance Documents	Standards/ References	Testing Results
Precision Study using Clinical Specimens (frozen apheresis)	Demonstrate site-to-site system precision for viable CD34+ cells/ $\mu$ L using frozen apheresis specimens	Special Controls Guidance Document: Premarket Notifications for Automated Differential Cell Counters for Immature or Abnormal Blood Cells - Precision (Section 9)	CLSI EP5-A3, Evaluation of Precision Performance of Quantitative Measurement Methods; Approved Guideline – Third Edition.  FDA Standard Recognition # 7-251	Analysis of the data collected demonstrates that the AQUIOS STEM Kit on AQUIOS CL meets performance requirements for repeatability and reproducibility for frozen apheresis samples.
Measurement Procedure Comparison (Method comparison to predicate)	Demonstrate the substantial equivalency of the AQUIOS STEM System for the simultaneous identification and enumeration of viable CD45+ cells/ $\mu$ L, viable CD34+ cells/ $\mu$ L and viable percent (%) CD34+	Special Controls Guidance Document: Premarket Notifications for Automated Differential Cell Counters for Immature or Abnormal Blood Cells - Accuracy (Section 8)	CLSI EP09c: Measurement Procedure Comparison and Bias Estimation Using Patient Samples; Approved Guidelines – Third Edition #7-296	Analysis of the data collected demonstrates that the AQUIOS STEM Kit reagent shows acceptable substantial equivalence as compared to the predicate stemCXP SYSTEM.
Reference Interval	Establish adult reference interval for viable CD34+ cells/ $\mu$ L, viable percent (%) CD34+, and viable CD45+ cells/ $\mu$ L on the AQUIOS STEM Kit system.	Special Controls Guidance Document: Premarket Notifications for Automated Differential Cell Counters for Immature or Abnormal Blood Cells – Reference Values (Section 14)	CLSI EP28-A3c, Defining, Establishing, and Verifying Reference Intervals in the Clinical Laboratory. Third Edition FDA Standard Recognition # 7-224	Adult reference intervals were established.

**Substantial Equivalence Conclusion to Demonstrate Safety, Effectiveness & Equivalent Performance to Predicate:**

In conclusion, the AQUIOS STEM System as described in this submission is substantially equivalent in terms of safety and effectiveness to its predicate devices.

This summary of safety and effectiveness is being submitted in accordance with the requirements of the Safe Medical Device Act of 1990 and the implementing regulation 21 CFR 807.92.