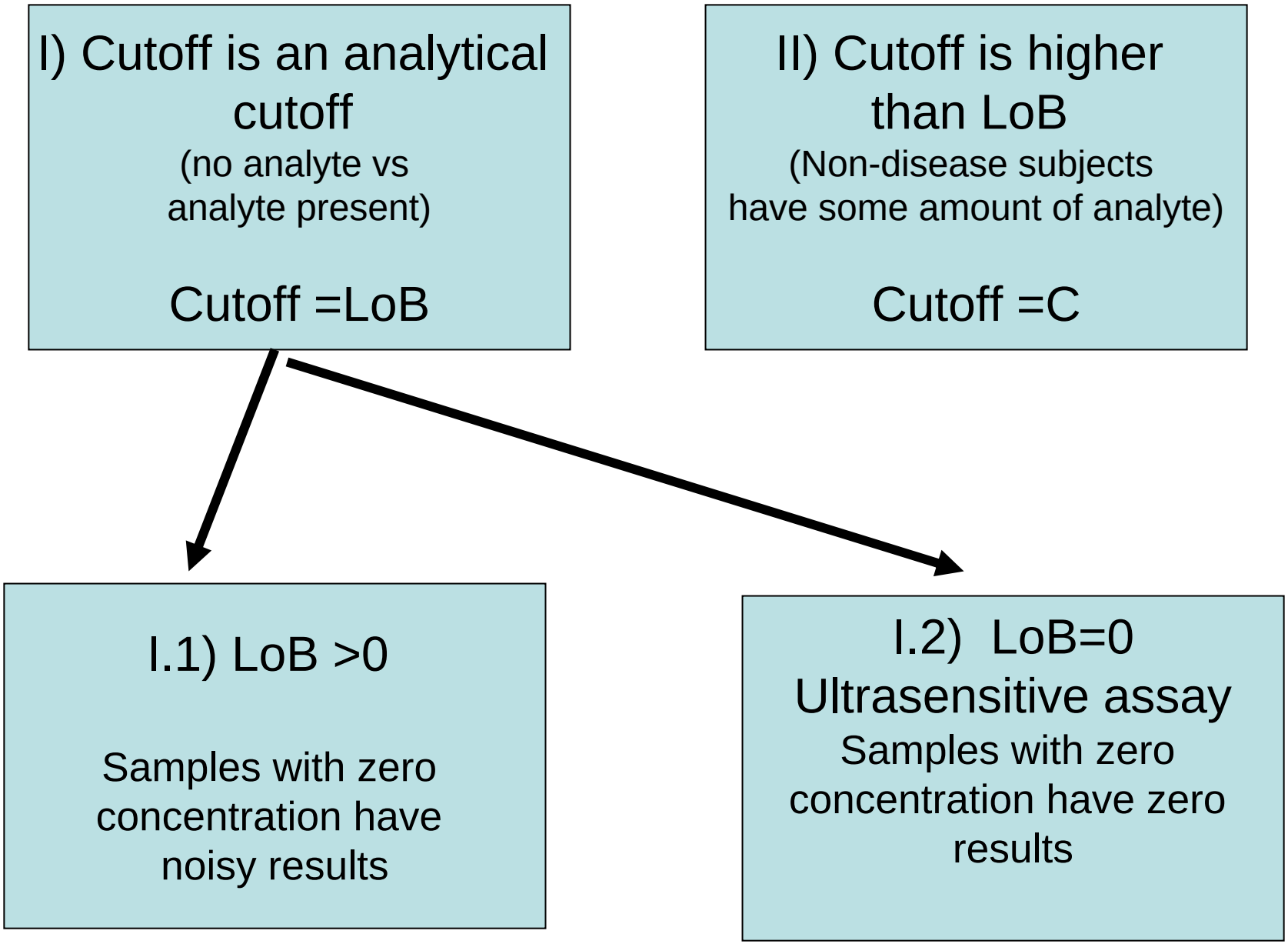
FDA Response

Qualitative Test with Two Outcomes

Cutoff for qualitative test:

- THRESHOLD for the OBSERVED result for a sample above which the result for a sample is reported as positive and below which the result is reported as negative.

  There are three slightly different scenarios.


I) Cutoff is an analytical cutoff
(no analyte vs analyte present)
Cutoff =LoB
II) Cutoff is higher than LoB
(Non-disease subjects have some amount of analyte)
Cutoff =C
I.1) LoB >0
Samples with zero concentration have noisy results
I.2) LoB=0
Ultrasensitive assay
Samples with zero concentration have zero results

Answer is provided

- Scenario II
  (cutoff is higher than LoB)
- Scenario I.1 (Cutoff=LoB, LoB>0)
- Scenario II.2 (Cutoff=LoB, LoB=0)

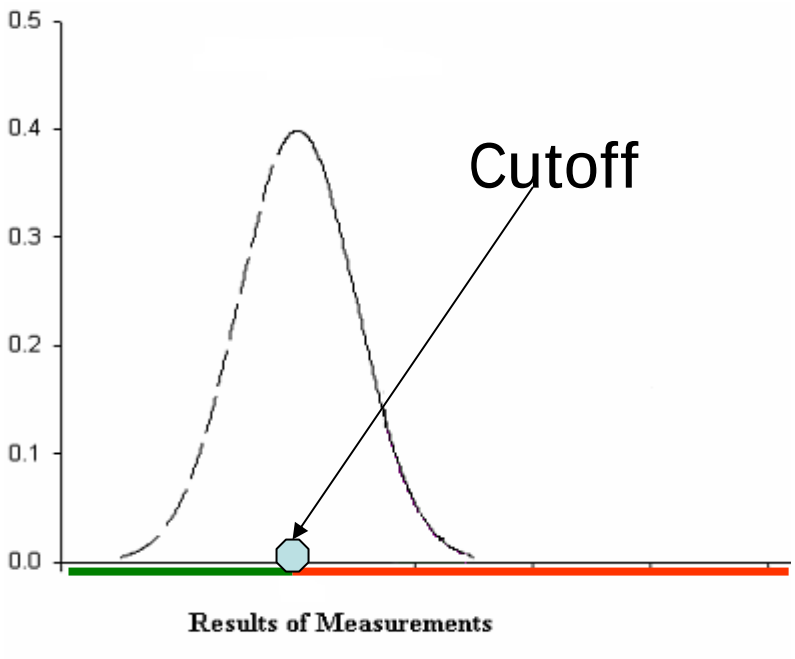
Frequently Asked Question Submitted by the Audience:

Guidance Documents for several PCR/RT-PCR based IVD devices discuss inclusion of a High Negative sample type in Precision studies. Please explain the rationale for extensive testing of high negative samples. Please explain the clinical relevance/value in obtaining results from high negative samples that can yield highly variable results (from 0-95% rates of detection), particularly in light of the fact that these samples are, by definition, below the Limit of Detection and therefore, by definition, known to not be reproducible.

Scenario II

Cutoff is based on clinical performance
(Non-diseased and Diseased subjects have some amounts of analyte)

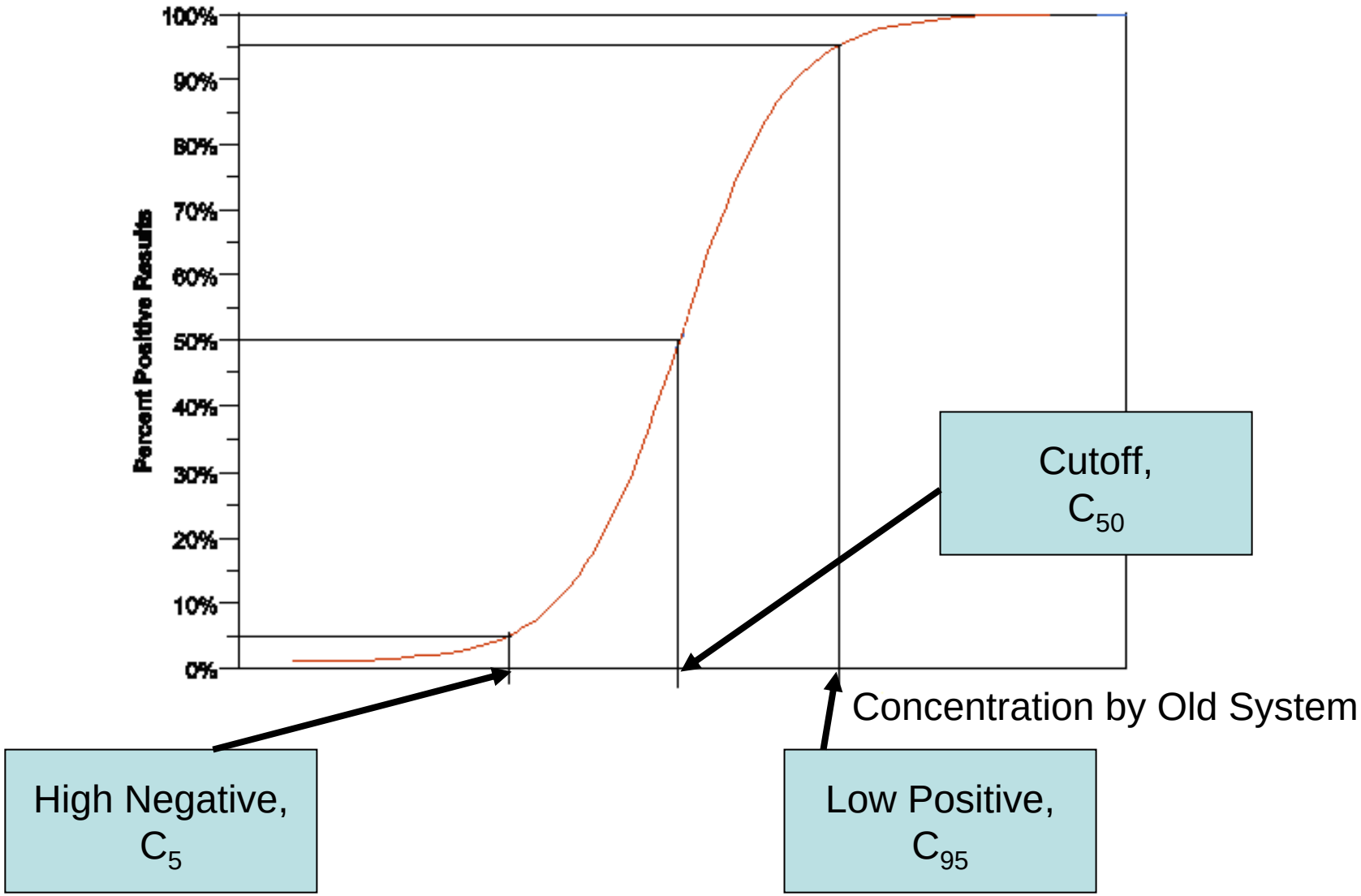
- Actual CONCENTRATION in a sample with this concentration is 50% positive and 50% negative (C_{50}) if a large series of repeated tests were performed



See CLSI EP12-A2

Assume that a distribution of measurement error is symmetrical.

Scenario II (cont.)



C_5 and C_{95} are important performance characteristics for qualitative test

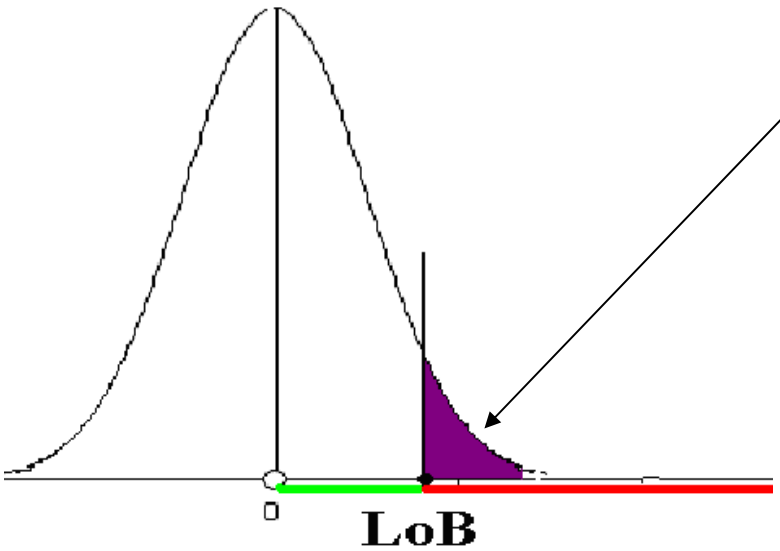
Scenario II (cont.)

Samples in precision study for qualitative test:

1) Sample below the cutoff (around C_5)
2) Sample above the cutoff (around C_{95})
3) Sample truly negative (zero analyte)
4) Sample moderate positive

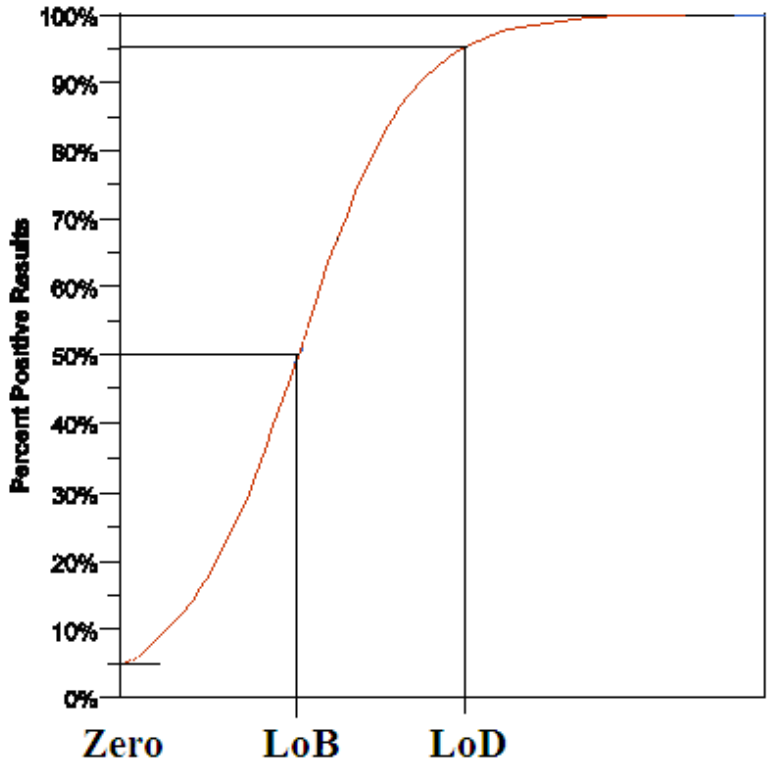
Scenario I.1: Cutoff =LoB

Samples with zero concentration have noisy results



- Cutoff is based on the performance of the samples with zero concentration, Cutoff=LoB

- Percent of positive results for the samples with zero concentration is 5%;
- Percent of positive results for the samples with LoB concentration is 50%;
- Percent of positive results for the samples with LoD is 95%



C_5=zero, C_{95}=LoD

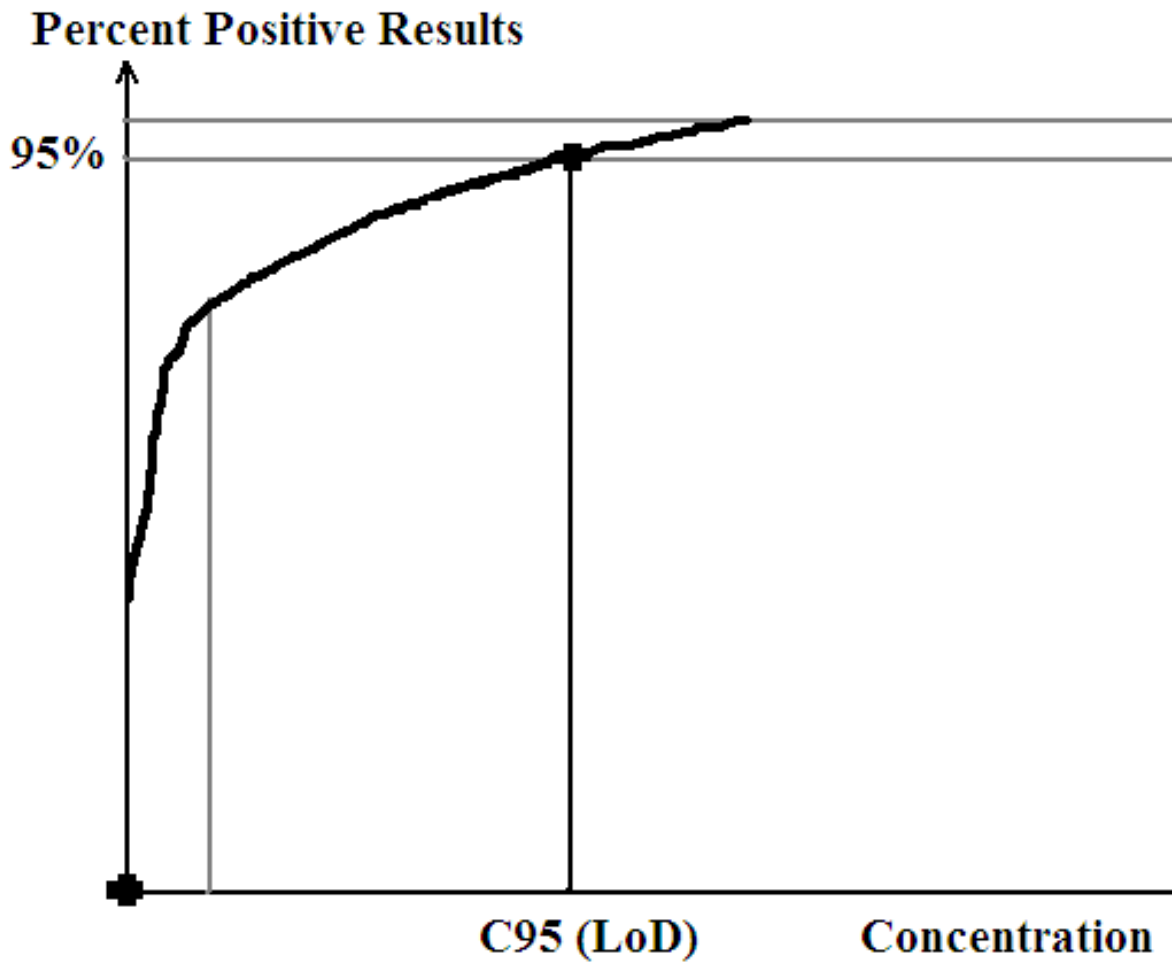
Scenario I.1(cont.)

Samples in precision study for qualitative test:

1) Sample above the cutoff (around LoD)
   (C_{95}=LoD)
2) Sample truly negative (zero analyte)
   (C_5=0)
3) Sample moderate positive

Scenario I.2 (cont.) Ultrasensitive test

- Zero concentration has zero percent positive results;
- Concentration corresponding to Ct=45 is close to zero;
- C_{95} (LoD)- concentration corresponding to Ct=38.



Scenario I.2

LoB=0, Ultrasensitive test

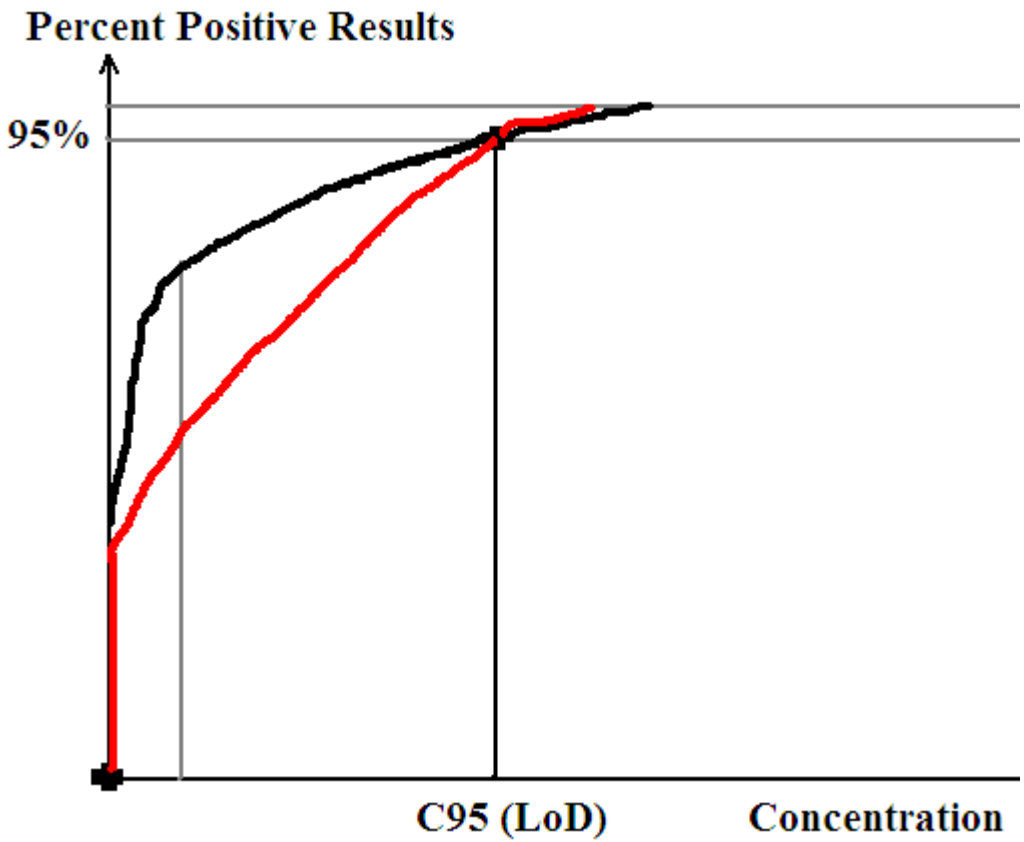
Example of Ultrasensitive Test**:** RT-PCR

Consider that Cutoff =45 cycles;

- If samples are truly negative, all results are "Negative" => Type I error is close to zero.
- Cutoff is not established based on the truly negative samples (samples with zero concentration);

Scenario I.2 (cont.)

Problem : C_5 not easy to prepare.
C_5 is very close to 0
where large variability.
If only two points:
Zero concentration
percent of positive
results is 0
•**LoD concentration**
percent of positive
results is 95%
then curves of %
positive results of two tests
can be different



(much uncertainty between two curves if only two points on these curves are similar)

Scenario I.2 (cont.)

Modified Approach Case A

If the percent of Diseased subjects from the intended use population with the test results less than LoD is less than **10%** of all Diseased subjects of the intended use population **,** then no need for C_5.

Modified recommended concentrations for precision studies :

- truly negative sample
- C_{95} (LoD) sample
- moderate positive

Scenario I.2 (cont.)

Modified Approach Case B

If the percent of Diseased subjects of the intended use population with test results less than LoD is greater than or equal to **10%** of all Diseased subjects of the intended use population**,** then a sample from the range C_{20}-C_{80} is recommended for testing.

Modified recommended concentrations for precision studies :

- truly negative sample
- C_{95} (LoD) sample
- Sample from range C_{20}-C_{80}
- Moderate positive