

## FDA LDT Matrix

| Requirement  | Stage | Date        | 1976-Type | HLA for Transplant | Forensic | VHA/DoD | NY CLEP | Unmet Need | Currently Marketed | Rare RBC Antigens | New LDT | Minor Mod. to Curr. Mark. | Signif. Mod. to Curr. Mark. | Mod. Other's 510(k) | Mod. Other's PMA |
|--|-------|-------------|-----------|--------------------|----------|---------|---------|------------|--------------------|-------------------|---------|---------------------------|-----------------------------|---------------------|------------------|
| <b>MDR, Correction, Removal</b><br>(§ 803 and § 806)   | 1     | May 6, 2025 | No        | No                 | No       | No      | Yes     | Yes        | Yes                | Yes               | Yes     | Yes                       | Yes                         | Yes                 | Yes              |
| <b>Complaint Files</b><br>(§ 820.198)  | 1     | May 6, 2025 | No        | No                 | No       | No      | Yes     | Yes        | Yes                | Yes               | Yes     | Yes                       | Yes                         | Yes                 | Yes              |
| <b>Registration</b><br>(§ 807)   | 2     | May 6, 2026 | No        | No                 | No       | No      | Yes     | Yes        | Yes                | Yes               | Yes     | Yes                       | Yes                         | Yes                 | Yes              |
| <b>Listing</b><br>(§ 807)  | 2     | May 6, 2026 | No        | No                 | No       | No      | Yes     | Yes        | Yes                | Yes               | Yes     | Yes                       | Yes                         | Yes                 | Yes              |
| <b>Labeling</b><br>(§ 809.10)  | 2     | May 6, 2026 | No        | No                 | No       | No      | Yes     | Yes        | Yes                | Yes               | Yes     | Yes                       | Yes                         | Yes                 | Yes              |
| <b>Investigational Device</b><br>(§ 812)   | 2     | May 6, 2026 | No        | No                 | No       | No      | Yes     | Yes        | Yes                | Yes               | Yes     | Yes                       | Yes                         | Yes                 | Yes              |
| <b>Design Controls</b><br>(§ 820.30)   | 3     | May 6, 2027 | No        | No                 | No       | No      | Yes     | No         | No                 | No                | Yes     | No*                       | Yes                         | Yes                 | Yes              |
| <b>Purchasing Controls</b><br>(including supplier controls)<br>(§ 820.50)  | 3     | May 6, 2027 | No        | No                 | No       | No      | Yes     | No         | No                 | No                | Yes     | No*                       | Yes                         | Yes                 | Yes              |
| <b>Acceptance Activities</b><br>(receiving, in-process, and finished device acceptance)<br>(§ 820.80 and § 820.86) | 3     | May 6, 2027 | No        | No                 | No       | No      | Yes     | No         | No                 | No                | Yes     | No*                       | Yes                         | Yes                 | Yes              |
| <b>CAPA</b><br>(§ 820.100)   | 3     | May 6, 2027 | No        | No                 | No       | No      | Yes     | No         | No                 | No                | Yes     | No*                       | Yes                         | Yes                 | Yes              |
| <b>Records</b><br>(part 820, subpart M)  | 3     | May 6, 2027 | No        | No                 | No       | No      | Yes     | Yes        | Yes                | Yes               | Yes     | Yes                       | Yes                         | Yes                 | Yes              |
| <b>Premarket Review</b><br>(high risk); PMA  | 4     | Nov 6, 2027 | No        | No                 | No       | No      | No      | No         | No                 | No                | Yes     | No                        | Yes                         | No                  | Yes              |
| <b>Premarket Review</b><br>(mod/low risk); 510k and De Novo  | 5     | May 6, 2028 | No        | No                 | No       | No      | No      | No         | No                 | No                | Yes     | No                        | Yes                         | No                  | N/A (PMA)        |

Please send comments/edits to [jonathan.genzen@aruplab.com](mailto:jonathan.genzen@aruplab.com). See final rule for exact requirements.

\*Pending clarification.