Guidelines for Validation of Quantitative Gluten Methods, with Specific Examples for ELISA Assays

3 **1 Scope**

4 The purpose of this document is to provide comprehensive technical guidelines for method developers 5 conducting validation studies for quantitative gluten methods, for example methods submitted for AOAC 6 INTERNATIONAL (AOAC) *Performance Tested Methods*SM (PTM) status and/or for AOAC *Official* 7 *Methods of Analysis*SM (OMA) status. This document is not intended to describe requirements for 8 laboratories using commercial methods for gluten analysis, though for these laboratories it would assist 9 their understanding of the consensus-based approach, the terminology used, and what information they can

10 expect to receive from method developers.

- 11 The requirements for method developer single-laboratory validation (SLV) studies, independent
- validation studies, and collaborative validation studies are described. Specific examples are provided for
 Enzyme-Linked Immunosorbent Assay (ELISA) methods.
- For AOAC PTM and OMA validations, a study protocol should be reviewed prior to commencement ofthe study.

16 2 Applicability

- 17 These guidelines are intended to be applicable to the validation of candidate quantitative gluten methods,
- 18 whether proprietary or non-proprietary, including those that may be submitted to AOAC for OMA status
- 19 or PTM certification. Unforeseen circumstances may necessitate divergence from these guidelines in certain
- 20 cases, and these must be reviewed by AOAC or another appropriate agency (other than the method
- developer). The AOAC PTM Program requires a method developer SLV, and an independent laboratory
- study. The AOAC OMA Program requires an SLV (also known as the pre-collaborative study) and a collaborative study to achieve Final Action status. A harmonized PTM-OMA Program can be followed in
- which PTM certification is sought and, if successful, serves as the SLV phase of the OMA Program.

25 **3 Terms and Definitions**

- 26 Where appropriate, definitions have been taken from international standards and the source is 27 cited. Sources of definitions and other references are included in the Reference list.
- 28 (a) Analyte.—Chemical entity or entities measured by the measurement system, which may be a
- 29 marker (e.g., a specific gluten peptide or protein) or a surrogate (e.g., another protein from 30 wheat, rye, barley or oats that correlates with the presence of gluten).
- 30 wheat, rye, barley of oats that concludes with the presence of gluten).
- See also "Measurand" definition. See De Bievre (1) for a detailed discussion of the difference
 between "analyte" and "measurand".
- 33 (b) *Bias.*—Difference between the expectation of the test results and an accepted reference
- value. Bias is the total systematic error as contrasted to random error. There may be one or moresystematic error components contributing to the bias.
- 36 (c) *Calibrant*.—A material used for calibration of a measurement procedure.
- 37 (d) *Candidate method*.—The method submitted for validation.
- 38 (e) Candidate method result.—The final results of the quantitative analysis for the candidate
- 39 method.
- 40 (f) Collaborator.—An intended user who participates in the collaborative study.

- 41 (g) Cross-reactivity.—A measurable response, above the LOQ of the method, to a material other
- 42 than the target analyte.
- 43 (h) Cross-reactivity study.—The examination of matrices that do not contain claimed analyte,
- which are potentially cross-reactive, to determine that they do not produce a measurable responseabove the claimed LOQ of the method.
- 46 (i) Enzyme-linked immunosorbent assay (ELISA).—An analytical procedure characterized by the
- 47 recognition and binding of specific antigens by antibodies and signal generation by an enzyme-48 substrate reaction.
- 49 (j) *Gluten*.—A protein fraction from wheat, rye, barley, oats or their crossbred varieties and
- 50 derivatives thereof, to which some persons are intolerant, and that is insoluble in water and 0.5M
- 51 NaCl (2), Throughout this document, the word 'wheat' refers to all Triticum species and their
- 52 crossbreeds, such as triticale, durum wheat, spelt and Khorasan wheat, and their hybrids and
- 53 crossbred varieties such as Triticale. [Per Codex Standard 119-1979, "oats can be tolerated by
- 54 most but not all people who are intolerant to gluten. Therefore, the allowance of oats that are not
- contaminated with wheat, rye or barley in food [...] may be determined at the national level (2)].
- 56 (**k**) *Incurred test material.*—A material prepared from a food matrix into which a gluten source
- (e.g., flour) has been incorporated prior to subjecting the matrix to a given food processingoperation.
- 59 (1) *Independent testing site.*—A testing site not owned, operated or controlled by the same entity 60 as the method developer.
- 61 (m) *Interference study.*—The examination of matrices expected to be tested with the method, to 62 demonstrate that they do not interfere with detection of the analyte.
- 63 (n) Intermediate precision.—Precision under intermediate conditions (ISO 3534-2; 3). For the
- 64 purposes of this document, the subscript notation "i" will be used to indicate terms and
- estimators associated with intermediate precision. Estimation methods can be found in Section4.6
- 67 (o) Intermediate precision conditions.—Conditions where test results or measurement results are
- 68 obtained with the same method, on identical test/measurement items in the same test or
- 69 measurement facility, under some different operating condition, which may include, but are not
- 70 limited to: time, calibration, operator, reagent lots and equipment.
- 71 Specific criteria for intermediate precision conditions are given in Section **4.4**
- 72 (**p**) *Limit of detection (LOD).*—The lowest concentration or mass of analyte in a test material that
- 73 can be distinguished from a true blank test material at a specified probability level (ISO 5725-
- 1:2023; 4). See further details on how to determine LOD in Section 6.5.
- 75 (q) *Limit of quantification (LOQ).*—The lowest level of analyte in a test portion that can be
- reasonably quantified at a specified level of precision (ISO 5725-1:2023; 4). See further details
 on how to determine LOQ in Section 6.6
- 78 (r) LOQ_{RSD} .—A limit of quantification with a specified intermediate precision relative
- standard deviation, expressed as a percentage. For example, an LOQ_{10} from a single laboratory
- validation would be the lowest concentration where the $RSD_i = 10\%$, and the LOQ_{10} from a
- 81 collaborative study would be the lowest concentration where the $RSD_R = 10\%$.

- 82 (x) Matrix.—Totality of components of a material system except the analyte (ISO 17511; 5). For
- 83 example, the food, beverage, or environmental surface material to be included in the validation 84
- as per the intended use of the method.
- 85 (y) Measurand.—The quantity intended to be measured (the specification of the measurand
- should be sufficiently detailed to avoid any ambiguity). See also "analyte" definition. 86
- 87 (z) Measurement interference.—A cause of significant bias in the measured analyte
- 88 concentration due to the effect of another component or property of the sample which may result
- 89 from non-specificity of the detection system, suppression of an indicator reaction, or inhibition
- 90 of the analyte. (CLSI guideline EP07-A2; 6) An interference can be endogenous, present in the
- 91 sample, or exogenous, introduced into the sample during the measurement process.
- 92 (aa) *Measurement range*.—The concentration range over which the target analyte can be reliably 93 quantified/detected.
- 94 (bb) Precision.—The closeness of agreement between independent test results under stipulated 95 conditions. (ISO 5725-1; 4).
- 96 (cc) *Qualitative method*.—Method of analysis whose response is either the presence or absence 97 of the analyte.
- 98 (dd) Quantitative method.—Method of analysis whose result is the amount (mass or 99 concentration) of the analyte.
- 100 (ee) *Recovery.*—The fraction or percentage of analyte that is recovered when the test portion is 101 analyzed using the entire method.
- (ff) Reference material.-Material, sufficiently homogeneous and stable with respect to one or 102
- 103 more specified properties, which has been established to be fit for its intended use in a
- 104 measurement process (see NIST SRM Definitions https://www.nist.gov/srm/srm-definitions).
- 105 (gg) Repeatability.—Precision under repeatability conditions. (ISO 5725-1; 4).
- 106 (hh) Repeatability conditions.—Conditions where independent test results are obtained with the
- 107 same method on equivalent test items in the same laboratory by the same operator using the same
- 108 equipment within short intervals of time.
- 109 (ii) *Reproducibility.*—Precision under reproducibility conditions (ISO 5725-1; 4).
- (ij)Reproducibility conditions.—Conditions where independent test results are obtained with the 110
- 111 same methods on equivalent test items in different laboratories with different operators using
- 112 separate instruments.
- (kk) Robustness.—Measure of the capacity of an analytical procedure to remain unaffected by 113
- 114 small variations in method parameters; provides an indication of the method's reliability during 115 normal usage.
- 116 (II) Selectivity.—The degree to which the method can quantify the target analyte in the presence
- 117 of other analytes, matrices, or other potentially interfering materials. Includes:
- 118 (1) Breadth.—The ability of the method to detect gluten from multiple grain sources.
- 119 (2) Cross-reactivity.—See definition of cross-reactivity above.
- 120 (3) Measurement interference.—A cause of significant bias in the measured analyte
- 121 concentration due to the effect of another component or property of the sample which may result
- 122 from non-specificity of the detection system, suppression of an indicator reaction, or inhibition

- 123 of the analyte (CLSI_EP07-A2; 6). An interference can be endogenous, present in the test
- 124 material, or exogenous, introduced into the test material during the measurement process.
- 125 (mm) *Spiked test material.*—A food matrix into which gluten has been incorporated after all
- relevant food processing operations have been completed (see Annex A for details).
- 127 (nn) Test material.—A material used for method validation that either contains a gluten source
- 128 present at a given concentration in the context of a food or environmental matrix or is a blank 129 matrix free of gluten.
- 130 (**oo**) *Test portion.*—Portion of the test sample as prepared for testing or analysis, where the whole 131 quantity is used for analyte extraction at one time. (ISO 16577:2022; 7)

132 4 Method Developer Validation Study

- 133 Quantitative methods are those whose result is the amount (mass or concentration) of the analyte.
- 134 This guidance has been developed for use with candidate methods that are designed to quantify
- 135 gluten. If a candidate method's intended use is not covered by this document or existing
- 136 Standard Method Performance Requirements (SMPRsSM), the standing AOAC expert review
- 137 panel (ERP) for gluten, or other qualified agency, may determine the appropriate cross-
- 138 reactivity/interference panels, and performance requirements.
- 139 Method developers may prepare study test materials in-house for the SLV (method developer
- 140 study), but all test materials and test portions must be blind-coded and randomized. Analyses
- 141 conducted by the method developer must be performed by an independent analyst without prior
- 142 knowledge of the test materials undergoing analysis. Ideally, all test materials for the
- 143 independent laboratory and collaborative studies should be prepared by an external entity
- 144 independent from the method developer. At least one incurred test material for the independent
- 145 laboratory and collaborative studies must be prepared by an external entity independent from the 146 method developer. In situations where an independent entity is unavailable to prepare all of the
- 146 method developer. In situations where an independent entity is unavailable to prepare all of the 147 test materials for the independent laboratory and collaborative studies, or their use is impractical
- 147 for all test materials, method developers may produce and distribute test materials as long as
- 149 detailed information is provided on procedures used to prevent bias (preparation, coding, etc.),
- and justification is provided for failing to use an independent entity to prepare all of the test
- 151 materials.

152 **4.1 Scope**

- 153 A SLV study (also referred to as a Method Developer Study), is intended to evaluate the
- 154 performance of a candidate method in the following areas: (1) calibration fit, (2) selectivity, (3)
- 155 precision (repeatability and intermediate precision), (4) LOD/LOQ, (5) recovery, and (6)
- 156 robustness. These studies are generally conducted within a method developer laboratory.
- 157 Gluten has multiple potential sources wheat, rye, barley, oats and their hybrids and crossbreeds
- 158 and multiple regulatory levels. Developers must determine which of these sources and levels
- 159 their method is intended to detect, and perform matrix studies for each claimed gluten source.

160 4.2 Calibration Fit Study

- 161 Analyze calibration standards as they are included in the test kit, or prepared as described in the
- 162 test method. Analyze at least four replicates of each concentration defined for the calibration
- 163 curve. Fit the calibration curve using the regression model described in the method instructions
- 164 and/or kit insert, plotting each individual data point and not averaging. Full descriptions must be
- 165 provided with respect to performing the calibration function calculations, including any

- 166 transformations conducted and the regression model used. Full calibration curve plots and
- 167 calibration functions must be shown.
- 168 From the calibration curve function, determine the calculated concentrations for each of the
- 169 standards. Calculate the residuals for each concentration standard for each replicate. Residuals
- are the difference between the observed value and the predicted value for each dependent
- 171 variable in the calibration curve. (Residual = observed value predicted value.) Residuals should
- be calculated from the instrument response. For most quantitative gluten methods, instrument
- 173 response would be optical density (absorbance) values.
- 174 Plot the residuals versus concentration. Residuals should have random distributions and be
- 175 centered on zero. If a non-random pattern is observed, the calibration function or measurement
- range may not be appropriate. Residuals should generally also be <15% of the measured response,
- and up to 20% at the lowest non-zero calibration standard.

178 **4.3 Selectivity Study**

- 179 The selectivity study is intended to provide information on potential sources of cross-reactivity
- and interference. The information related to cross-reactivity and interference should be reported in
- 181 the validation report or in the package insert from the method developer.
- 182 (a) *Breadth.*—This section of the validation is intended to provide information to end users on
- 183 the method's performance with less common varieties of gluten-containing grains, such as
- 184 einkorn, spelt and emmer.
- 185 The materials identified in **Annex A**, Table A1, should be tested at three times the limit of
- 186 quantitation (LOQ) of the method (as long as that is equal to or below 20 mg/kg, otherwise test
- 187 at 20 mg/kg) in a rice flour matrix. Test six test portions per test material.
- 188 The absorbance or optical density (OD) values for all test portions and standards must be
- reported. The mean gluten concentration for each gluten source must be reported. Mean
- 190 concentrations below the LOQ should be reported as below the limit of quantitation (BLQ).
- 191 Percent recovery should be calculated and reported for the mean concentration from each gluten
- 192 source. If any analysis is repeated, all datasets must be reported and a justification given for all 193 repeat analysis.
- For methods claiming wheat, only common wheat (*Triticum aestivum*) should be used in all other studies described in this guidance.
- 196 As the Breadth study is purely informational, there are no acceptance criteria, but method
- developer should point out any of the gluten-containing grains that demonstrate recoveries below
 50%, in the method instructions.
- 199 (b) Cross-reactivity.—The matrices identified in Annex A, Table A2, at full, undiluted
- 200 concentration (with some exceptions as noted), will be prepared and analyzed with the candidate
- 201 method as it is designed for testing food products. One test portion of each blank food material
- should be analyzed according to the entire method protocol.
- 203 In the event that an unclaimed matrix tests above the method LOQ or lowest non-zero standard,
- 204 it or another example of the same matrix may be retested in six test portions, to rule out cross-
- 205 reactivity. If the result persists, the extract must be diluted and rerun to characterize the extent of
- the cross-reactivity, and the test material may also be evaluated with an alternative method (PCR,
- 207 Western blot, mass spectrometry, alternate ELISA, etc.) to verify whether the signal is the result
- 208 of cross-reactivity or a true positive due to cross-contact.

- 209 The absorbance or OD values for all test portions and standards must be reported. The
- 210 extrapolated concentration for all test portions that had an absorbance or OD above the limit of
- 211 quantitation of the method must be reported. If any analysis is repeated, all datasets must be
- 212 reported and a justification given for all repeat analysis.
- 213 Any cross-reactive matrix must be reported to end user as part of the method instructions.
- 214 (c) Interference.—The matrices identified in Annex A, Table A2 will be spiked with gluten from
- each claimed gluten source at three times the LOQ of the method (as long as that is equal to or
- 216 below 20 mg/kg, otherwise test at 20 mg/kg). Test material preparation is described in Annex B.
- 217 One test portion of each spiked test material will be analyzed with the candidate method as it is
- 218 designed for testing food products.
- 219 If a result is obtained that is above the measurement range of the method, the extract must be 220 diluted and re-analyzed.
- 221 The absorbance or OD values for all test portion extracts and standards must be reported. The
- 222 concentration for all test portions that had an absorbance or OD above the LOQ of the method
- must be reported. If any analysis is repeated, all datasets must be reported and a justification
- given for all repeat analysis. The percent recovery should be calculated and reported for each
- tested food.
- 226 Spiked test materials must render a result above the LOQ. In the event that the single test portion
- 227 replicate tests below the LOQ, that food matrix may be retested in six additional test portions,
- 228 with no results below the LOQ allowed, to rule out interference.
- 229 Findings that certain matrices interfere with gluten detection should be investigated further,
- using additional similar matrices, to determine the full scope of interference. Any interfering
- 231 matrices must be reported in the method instructions.

232 4.4 Matrix Study

- 233 The matrix study is intended to provide data on precision (repeatability and intermediate
- precision), limit of detection (LOD)/LOQ, and recovery in a controlled laboratory setting for all
- 235 gluten sources, matrices and surfaces claimed in the method's intended use statement.
- A matrix study must be performed in each claimed matrix. In order to ensure that each claimed
- 237 gluten source is represented, the gluten sources must be rotated across the claimed matrices as
- shown in Tables 1 or 2. The single matrix in which all gluten sources are tested, listed in Tables
- 1 and 2 as Matrix A, should be the most highly processed matrix used in the validation study.
- 240

Table 1. Rotation of gluten sources across claimed matrices for methods claiming to detect wheat, rye, and	
barley. The rotation of single gluten sources would continue for six matrices and greater.	

	Number of matrices claimed						
	1	2	3	4	5		
	Wheat	Wheat	Wheat	Wheat	Wheat		
Matrix A	Barley	Barley	Barley	Barley	Barley		
	Rye	Rye	Rye	Rye	Rye		
Matrix B		Wheat	Wheat	Wheat	Wheat		
Matrix C			Barley	Barley	Barley		
Matrix D				Rye	Rye		
Matrix E					Wheat		

Table 2. Rotation of gluten sources across claimed matrices for methods claiming to detect wheat, rye, barley, and oats. The rotation of single gluten sources would continue for six matrices and greater

	Number of matrices claimed						
	1	2	3	4	5		
	Wheat	Wheat	Wheat	Wheat	Wheat		
Motriy A	Barley	Barley	Barley	Barley	Barley		
Mathx A	Rye	Rye	Rye	Rye	Rye		
	Oats	Oats	Oats	Oats	Oats		
Matrix B		Wheat	Wheat	Wheat	Wheat		
Matrix C			Barley	Barley	Barley		
Matrix D				Rye	Rye		
Matrix E					Oats		

243

Alternatively, a matrix study for a matrix category may be performed by testing each claimed

gluten source, per the rotation shown in Tables 1 or 2, in at least five examples from the category, equally distributed across each available type of processing (Annex C). Test materials

247 under each type of processing must be incurred. As an example, a method wishing to make a

248 claim for the "Cereals (Not Fermented, Hydrolyzed or Fractionated)" category would need to test 249 one matrix from each of the five provided processing categories, and in each instance, gluten

would need to be added to the matrix prior to the described processing step. If a method

251 developer was unable to access suitable equipment for preparing incurred test materials in the

252 Pressure/Extruded type of processing, but was able to make incurred test materials for all other

types of processing, they could not claim the "Cereals (Not Fermented, Hydrolyzed or

Fractionated)" category. However, they could make a limited claim for "Raw, Processed, Baked,

255 Fried and Dehydrated Cereals". Method developers with the ability to produce fermented,

256 hydrolyzed or fractionated matrix test materials that were incurred with gluten prior to these

257 processes may make individual claims based on the fermentation organism, hydrolyzing agent or

258 fractionation process. Example claims would be "Soy Tempeh fermented with *Rhizopus*

259 *oligosporus*", "Modified corn starch hydrolyzed with sodium hydroxide", or "Wheat starch

260 fractioned with water".

261 Incurred test materials are required for evaluation of precision, LOD/LOQ, and recovery. See

262 Annex B for description of best practices for incurred test material preparation.

At least four concentrations per matrix/gluten source combination, including a zero/blank, must be included in the study. The "Low" concentration should be less than or equal to two times the

stated LOQ of the method, provided this is less than or equal to 20 mg/kg (if not, then the "Low"

- concentration should be 20 mg/kg). Other concentrations should span the calibration range, e.g.,at the middle and upper end of the calibration curve.
- 268 Individual studies may be designed for each performance parameter (repeatability, intermediate
- 269 precision, LOD/LOQ, and recovery). Intermediate precision study designs must include multiple
- test portions, at least two test kit lots, and day/operator as a single confounded factor.
- 271 Alternatively, a single, statistically valid study may be designed and utilized to provide estimates
- of precision (repeatability and intermediate precision), LOD/LOQ, recovery, and lot-to-lot
- 273 variability *see* Figures 1–4 for examples of acceptable study designs, but other designs may
- also be able to give satisfactory data. Designs 1b and 2b (Figures 2 and 4) will provide sufficient
- data for all parameters in the *Matrix Study and the Product Consistency and Stability Study* (5.2),
- if conducted on a sufficient number of test materials. At least four concentrations per
- matrix/gluten source combination, including a zero/blank, must be included in these studies aswell.
- 279 For methods that require the measurement of multiple replicate ELISA wells for each test
- 280 portion, use Designs 2a or 2b (*see* Figures 3 and 4), or other designs that include replicate wells
- 281 per test portion. For methods that only require the measurement of one ELISA well for each test
- 282 portion, any of the four study designs may be used.
- In order for the nested designs to be capable of estimating repeatability, at least two test portions must be analyzed under repeatability conditions (i.e., conducted on the same day, by the same operator, with the same calibration and equipment). Under these conditions, the nested designs can estimate both intermediate precision and repeatability because repeatability is a variance component within intermediate precision, as expressed in the following equation, where s_I^2 is the intermediate precision variance, s_{lot}^2 is the variance contributed by test kit lot, $s_{d/op}^2$ is the
- variance from the confounded factor of day and operator, and s_r^2 is the repeatability variance:

290
$$s_1^2 = s_1ot^2 + s_(d/op)^2 + s_r^2$$

Repeatability estimates are required at four concentrations for each claimed matrix: blank, low, medium, and high levels, according to the claimed method quantification range.

2

- As intermediate precision estimates are used for the calculation of LOD and LOQ, estimates are required for all matrices, with at least three concentration levels per matrix: blank, low, and medium.
- 296

Table 3. Required test materials for quantitative study designs

Parameter	Number of matrices and concentrations
Repeatability	All matrices, 4 concentrations (blank, low, medium, and high) for each matrix
Intermediate	All matrices, at least 3 concentrations (blank, low, medium) for each matrix
Precision	
LOD/LOQ	All matrices, at least 3 concentrations (blank, low, medium) for each matrix
Recovery	All matrices, three non-blank concentrations (i.e., low, medium, and high)

²⁹⁷

- 298 Test kit lot variance (lot-to-lot consistency) must be evaluated for at least one matrix using three
- test kit lots. This can be included in the estimation of intermediate precision (Designs 1b and 2b,
- 300 Figures 2 and 4) or may be conducted separately (*see Robustness Study*).

Design 1a (Figure 1) can be used to estimate (1) intermediate precision (which includes repeatability, test kit lot variance (with 1 degree of freedom, df), and day/operator confounded

303 variance) and (2) repeatability.



Figure 1. Design 1a. Lot: test kit lot, TP: test portion, E: ELISA measurement. Design 1a can be used to estimate intermediate precision and repeatability.

307 Two test kit lots are used to analyze each test material. Two operators conduct analysis on 2 days

308 for each test kit lot. For each day and lot, the assigned operator conducts extraction and analysis

309 of two test portions of the test material, with one ELISA measurement performed per test 310 portion

310 portion.

304

311 Design 1b (Figure 2) can be used to estimate (1) intermediate precision (which includes

repeatability, test kit lot variance (with 2 df), and day/operator confounded variance) (2) repeatability, and (3) lot-to-lot product consistency.



314

Figure 2. Design 1b. Lot: test kit lot, TP: test portion, E: ELISA measurement. Design 1b can be used to estimate intermediate precision, repeatability, and lot-to-lot product consistency.

317

318 Three test kit lots are used to analyze each test material. Two operators conduct analysis on 2

- 319 days for each test kit lot. For each day and lot, the assigned operator conducts extraction and 320 analysis of two test portions of the test material, with one ELISA measurement performed per
- 321 test portion.

322 Design 2a (Figure 3) can be used to estimate (1) intermediate precision (which includes

323 repeatability, test kit lot variance (with 1 df), day/operator confounded variance, and ELISA

- 324 variance), (2) repeatability (which includes test portion and ELISA variance), and (3) ELISA
- 325 variance.



Figure 3. Design 2a. Lot: test kit lot, TP: test portion, E: ELISA measurement. Design 2a can be used to estimate
 intermediate precision, repeatability, and ELISA variance.

329

In this instance the repeatability variance can be further split into test portion variance and ELISA variance as shown in the equation below, where s_r^2 is repeatability variance, s_{TP}^2 is the variance attributed to test portion, s_{ELISA}^2 is the variance attributed to ELISA measurement variance:

$$s_r^2 = s_{TP}^2 + s_{ELISA}^2$$

Two test kit lots are used to analyze each test material. Two operators conduct analysis on 2 days for each test kit lot. For each day and lot, the assigned operator conducts extraction and analysis of two test portions of test material, with two ELISA measurements performed per test portion.

337 Design 2b Figure 4 can be used to estimate (1) intermediate precision (which includes

338 repeatability, test kit lot variance (with 2 df), day/operator confounded variance, and ELISA

- 339 variance), (2) repeatability (which includes test portion variance and ELISA variance), (3)
- 340 ELISA variance, and (4) lot-to-lot product consistency.
- 341



342

Figure 4. Design 2b. Lot: test kit lot, TP: test portion, E: ELISA measurement. Design 2b can be used to estimate intermediate precision, repeatability, ELISA variance, and lot-to-lot product consistency.

345

Three test kit lots are used to analyze each test material. Two operators conduct analysis on 2

347 days for each test kit lot. For each day and lot, the assigned operator conducts extraction and

analysis of two test portions of test material, with two ELISA measurements performed per testportion.

350 If repeatability is conducted separately (Figure 5) at least six test portions of each test material

- 351 should be analyzed according to the entire method as written. Analysis should be conducted by
- one analyst on 1 day, using one test kit lot and the same equipment (n = 6 per test material).



362 Figure 5. Repeatability only design.

363

(a) LOD/LOQ estimation.—In SLV studies for gluten immunoassay methods, the LOD and LOQ
 will be estimated using intermediate precision data.

Data collected from analysis of incurred test materials for all matrices will be used to model the relationship between analyte concentration and intermediate precision (*see* **Annex D**). Data used must meet other method performance criteria (e.g., recovery).

369 (b) *Recovery assessment.*—Data collected for the purposes of precision evaluation may also be 370 used for the recovery assessment.

371 If conducted separately from the precision assessment, evaluate each incurred matrix with six

independent analyses (test portions) per concentration level at a minimum of three non-blankconcentration levels covering the analytical range.

4.5 Data Analysis and Reporting for Matrix Studies

375 (a) Nested designs: repeatability and intermediate precision.—Data generated from nested

designs, such as those as described above, should be analyzed by an ANOVA capable of

377 providing estimates of intermediate precision and repeatability. Annex D contains full

instructions, R code, and example datasets for the study designs described in this guidance.

379 (**b**) *Repeatability only.*—In a situation where a study design for estimating repeatability alone is

380 selected, the mean, standard deviation, and relative standard deviation should be calculated for

381 each test material (i.e., each matrix-concentration combination). Formulas for standard deviation

and relative standard deviation, as defined in OMA Appendix F (8), are as follows:

- 383 Standard deviation (s_r): s_r = $[\Sigma(x_i \overline{x})^2/(n-1)]^{0.5}$
- 384 Relative standard deviation (RSD): RSD_r = $s_r \times 100/\bar{x}$

385 The study report must include the standard deviation and RSD values for each test material, and

all repeatability estimates must meet requirements set forth in the relevant SMPR or established

387 by the ERP or other review panel. In the absence of an SMPR and ERP, acceptable RSD_r values

for gluten immunoassays are generally $\leq 20\%$ within the claimed measurement range of the

assay.

- 390 (c) *LOD*, *LOQ*.—LOD will be estimated using a hypothesis test approach, with $\alpha = \beta = 0.05$. The
- 391 relationship between observed concentration and intermediate precision standard deviation must
- be taken into account in the estimation of LOD (also referred to as a precision profile estimation
- 393 method for LOD). Full instructions for the calculations to estimate LOD are in **Annex D**.
- 394 LOQ estimation will be based on the relationship between concentration and intermediate
- precision standard deviation. Full instructions for the calculations to estimate LOQ are in Annex
 D.
- LOD and LOQ can be estimated per gluten source and matrix, or as pooled values across all
 gluten sources and matrices if variances are homogeneous.
- 399 (**d**) *Recovery.*—
- 400

Percent Recovery = (Experimental concentration)/(Expected concentration) \times 100

- 401 The expected concentration for each test material should be calculated from the incurred
- 402 concentration, accounting for any mass changes during processing operations (e.g., moisture loss403 during baking).
- 404 For each claimed matrix and gluten source, plot the observed concentration vs. expected
- 405 concentration for all levels, and perform a linear regression to determine the slope and
- 406 confidence interval of the slope. Also calculate and report the recovery and confidence interval at
- 407 each concentration, by taking the mean of the test portion values and calculating the recovery.

408 **4.6 Acceptance Criteria for Matrix Studies**

- 409 Each claimed gluten source (wheat, rye, barley and/or oats) in each matrix (or pooled across
- 410 matrices if all matrices show equivalent recoveries) should all produce recovery values
- 411 (determined as the mean value by weighted linear regression, with the associated confidence
- 412 intervals) that comply with the relevant method performance requirements (e.g., AOAC SMPR).
- 413 In the absence of an applicable SMPR, an ERP will evaluate the study data according to their
- 414 expert opinions. With respect to recovery, while ideal values are from 80–120%, for single-
- 415 gluten-source validations values of 50–150% can be acceptable [Abbott et al. (9)]. For multiple
- 416 gluten source validations (e.g., wheat, rye and barley), values of 50–200% can be acceptable at 417 the discretion of the ERP (AOAC SMPR 2017.021; 10). In the event that the confidence interval
- 418 of the recovery mean as determined by weighted linear regression does not fall within the
- 419 specified recovery mean as determined by weighted mean regression does not ran within the
- 420 confidence interval calculated, to qualify as a gluten source quantified by the method. All data
- 421 must be reported, included any testing done on different grain sources and varieties, and retests
- 422 must be explained. Any gluten sources or matrices that do not meet these criteria cannot be
- 423 claimed, and must be reported in the method instructions.
- 424 All parameter point estimates must meet any applicable requirements for confidence intervals
- 425 established by the AOAC Statistics Committee or other relevant guidance.
- 426 If an applicable SMPR is available, the SLV study data must meet the corresponding criteria.
- 427 (a) LOQ.—The RSD_i at the LOQ must be less than or equal to the RSD_i in the relevant SMPR
- 428 (or the RSD_R if an RSD_i is not listed). If there is no SMPR available for, RSD_i at the LOQ must
- 429 be $\leq 30\%$.
- 430 If a method developer has an LOQ claimed as part of the method design (e.g., the lowest non-
- 431 zero calibrant), the estimated LOQ from the SLV (which meets the SMPR requirements for
- $\label{eq:stars} 432 \qquad \text{maximum RSD}_i\text{) must be less than or equal to the claimed LOQ of the kit, within statistical}$

- tolerances. If the estimated LOQ from the SLV is greater than the claimed LOQ of the kit, the
- 434 method developer must revise the LOQ claimed in the test kit insert and validation reports to
- 435 meet the precision requirements for LOQ.
- 436 In the validation reports and test kit inserts, the method developers must indicate the actual RSD_i
- 437 value estimated for the LOQ of the kit as part of the LOQ information. For example:
- $\begin{array}{ll} 438 & LOQ_{15}, \text{ for a method where the existing LOQ claimed by the kit had an estimated RSD_i of 15\%\\ 439 & \text{in the SLV} \end{array}$
- 440 LOQ₃₀, for a method where the LOQ was set based on the SLV outcome and a maximum RSD_i
- 441 of 30%. Acceptance criteria for the maximum RSD also includes meeting requirements for
- 442 confidence intervals, as established by the AOAC Statistics Committee.
- The LOQ estimate must be greater than or equal to the LOD estimate. If the LOQ estimate is
- lower than the LOD estimate, the LOQ should be reported as the same concentration as the LOD.

445 **4.7 Robustness Study**

- 446 The method developer, in conjunction with the AOAC or other independent validation manager,
- is expected to make a good faith effort to determine which, and to what magnitude, parametersare most likely to vary in the hands of an end user.
- 449 Analysis should be conducted on a minimum of one claimed matrix type, using one claimed
- 450 gluten source.
- 451 Spiked matrices are acceptable for test kit lot-to-lot stability analysis and robustness analysis
- 452 (except when varying extraction conditions). *See* **Annex B** for description of best practices for 453 spiked matrix preparation.
- 454 Incurred matrices may also be used for the robustness study, and should be used if extraction
- 455 conditions are varied. If sufficient quantities of incurred matrices have been prepared for the
- 456 matrix study, these test materials may also be used for the robustness studies (i.e., separate
- 457 incurred matrices are not required).
- 458 The robustness of the method should be investigated by performing experiments in which
- 459 specific parameters are changed to determine the impact on the experimental result. In particular,
- the effect of deviations in incubation times, reagent volumes, extraction conditions (time and
- temperature) should be investigated. Each parameter should be varied both up and down by at
- 462 least 20%. These parameters should be tested in a factorial or Plackett-Burman design, as
- 463 described in **Annex D**.
- 464 Five test portions should be tested for a test material at three times the LOQ (as long as that is
- 465 equal to or below 20 mg/kg, otherwise test at 20 mg/kg), and two test portions should be tested 466 of a blank test material for each treatment condition
- 466 of a blank test material, for each treatment condition.
- 467 Data should be analyzed as described in **Annex D**, or by other appropriate ANOVA, multi-factor
- 468 regression or generalized linear model software. If any of the experimental conditions evaluated
- 469 significantly affect the results, this should be reported in the kit insert information as an
- 470 instruction to end users to take special care not to vary that factor.
- 471 (a) *Product stability and consistency.*—If the test method is sold as a kit or device prepared in
- 472 lots or batches, a product consistency and stability study must be performed to ensure that the
- 473 performance of the product is consistent from lot-to-lot and over time under normal storage
- 474 conditions for the shelf life of the product. Lot-to-lot consistency and product stability can be

- 475 measured in the same set of experiments. As specified in Section 4.4, lot-to-lot stability and
- 476 consistency can also be assessed in the context of nested designs for intermediate precision
- estimation that utilize at least three lots of test kits. Alternatively, method developers may
- provide internal lot-to-lot and stability data for review, as long as the volume of data meets or
- 479 exceeds the data requested in the product stability and consistency studies described here.
- 480 The shelf life should include the stability of all the reagents provided with the test kit, ideally
- 481 through real-time testing of reagents under normal storage conditions. Accelerated stability
- 482 testing at higher than normal storage temperatures can also be used to estimate stability. An
- 483 expiration date for each test kit should be clearly indicated, along with appropriate conditions for
- 484 storage before use.
- 485 A minimum of three separate product lots must be evaluated. The product lots should span the
- 486 shelf life of the kit. For example, if the kit shelf life is 12 months, an approximately 12-month-
- 487 old kit, 6-month-old kit and recently produced kit should be evaluated. For an initial (SLV),
- 488 accelerated aging may be used if kits at the end of their shelf life are not available if this is
- done, then lot-to-lot stability should still be performed across three recent lots. Kits should be
- 490 aged using increased temperature storage as described in ASTM F1980-16 (11) or CLSI EP25-
- 491 A (12). Real time data is needed for validations such as AOAC Official Method applications, and
- 492 prior to the first AOAC PTM renewal.
- 493 If conducted separately from the matrix/intermediate precision studies, test materials used in the
- evaluation should be made in any one matrix claimed for the method, using all claimed gluten
- 495 sources, or using stable control materials, as long as these go through the entire testing process
- 496 from extraction to interpretation. Test materials should consist of a blank, as well as a test
- material spiked at three times the LOQ of the method (as long as that is equal to or below 20
 mg/kg, otherwise test at 20 mg/kg). Five test portions should be analyzed for each test material in
- 499 each of the three kit lots.
- 500 Results should be analyzed to determine mean results, repeatability standard deviation, and
- 501 recovery for each lot. These estimates must all meet acceptance criteria for all lots tested. If
- 502 product stability and consistency are included in a nested design for the matrix study, data should
- 503 be analyzed according to the ANOVA procedure outlined in Annex D.

504 **4.8 Method Instructions and Required Method Information**

- 505 Following the validation studies, the method developer should finalize the method instructions,
- 506 taking into account any information learned from the validation. If detailed method preparation
- 507 techniques are perceived to be proprietary information, requests may be made to the reviewers
- 508 (ERP or other volunteer experts) to keep this information confidential.
- 509 Within the method instructions, the method developer must provide:
- 510 (a) A statement of the expected context(s) of use, expected matrices and expected analytical
- 511 goals of the method.
- 512 **(b)** Specific qualifications or training required to perform the method.
- 513 (c) An applicability statement describing the method's target analyte, measurand, matrices within
- 514 scope, and important limitations.
- 515 (d) If the method is intended to conform to an existing SMPR document, the SMPR citation must
- 516 be provided.

- 517 (e) Step-by-step instructions for test portion preparation and performance of the method are
- 518 required. Pictorial examples are encouraged.
- (f) The reporting unit for all methods should be in mg/kg of gluten, although other reporting spin factors.
- 520 units may also be included (e.g., mg/kg of gliadin) with conversion factors.
- 521 (g) In addition to the information described in this document, method submissions must provide 522 any additional details mandated by relevant SMPRs.
- 523 In the validation study report, method developers must provide:
- 524 (a) Information on which gluten fractions from each claimed gluten source (e.g., gliadins from
- 525 wheat, hordeins from barley) the antibody/antibodies detect. Information on specific proteins or 526 epitopes may also be provided if available.
- 527 **(b)** Information on calibrants:
- 528 (1) Identification of the calibrant for the method
- 529 (2) How the calibrant was prepared
- 530 (3) How the concentration value of the calibrant was assigned
- 531 (4) Whether the calibrant made from raw or processed material
- 532 (5) Whether the calibrant was extracted or purified, and the method
- 533 (6) Whether the calibrant is provided in extraction or dilution buffer
- 534 (7) How the concentration of the calibrant is expressed
- 535 (8) Whether the calibrant is commercially available.
- (c) Complete information on the gluten sources (genus and species), matrices, and proceduresused to prepare validation test materials.

538 **5. Independent Laboratory Study**

- 539 **5.1 Scope**
- 540 The independent laboratory validation study should verify the analytical results obtained in the
- 541 method developer study in a controlled laboratory setting. The independent laboratory should
- 542 verify the repeatability, intermediate precision, LOD/LOQ, and recovery performance
- 543 parameters of the method.

544 5.2 Matrix Study

- 545 Incurred test materials are required for evaluation of repeatability, intermediate precision,
- LOD/LOQ, and recovery. See Annex B for description of best practices for incurred test material
 preparation.
- 548 At minimum, the independent laboratory must analyze at least one matrix for every five matrices
- 549 evaluated in the Method Developer Study (Table 4), following the rotation of claimed gluten
- sources shown in Tables 1 or 2, depending on the method claims. The independent laboratory
- 551 must analyze at least one environmental surface/Clean-In Place (CIP) solution for every five
- claimed. If both environmental surfaces and CIP solutions are claimed as matrices, and only one
- is to be included in the independent laboratory study, the environmental surface should be the
- 554 chosen matrix. The selection of which matrices/surfaces/solutions are analyzed should be
- reflective of the range of difficulty associated with the claimed matrices.

- 556 The study design, data analysis, and reporting for the independent laboratory study should follow
- the same requirements described in the *Matrix Study* section of the *Method Developer Study* (4.4).
- 559 6. Collaborative (Interlaboratory) Study

560 **6.1 Scope**

- 561 The intent of a collaborative study is to establish relevant method attribute estimates that can be
- 562 expected when a method is used in practice, with a particular focus on precision (repeatability and
- reproducibility) and recovery. Estimation of LOD and LOQ is also within the study scope.
- 564 Method developers may provide training on the test method to collaborator sites.

565 6.2 Number of Laboratories

- 566 Based on AOAC Appendix D (13) guidelines, studies must have a minimum of eight laboratories 567 submitting valid data (to avoid unduly large confidence bands about the estimated parameters).
- 568 To minimize potential bias, no more than 25% of the laboratories with data included in the final
- 569 dataset may come from the same organization. For this purpose, the term "organization" includes
- 570 companies (test kit manufacturers, method developers, food processors, etc.), regulatory bodies,
- 571 government agencies, or any other body (Appendix M; 14)

572 6.3 Matrix Study

- 573 The collaborator sites will perform the matrix studies for each claimed gluten source in at least
- one of the incurred matrices for each matrix category claimed in the method developer study,
- 575 following the rotation of claimed gluten sources shown in Tables 1 or 2, depending on the
- 576 method claims. The selection of which matrices/surfaces/solutions are analyzed should be
- 577 reflective of the range of difficulty associated with the claimed matrices.
- 578 If the method developer study consisted of only individual matrices, rather than matrix
- 579 categories, then the collaborator study will test at least one incurred matrix for every five
- 580 matrices tested in the method developer study, as shown in Table 4. The collaborator sites must
- also analyze at least one environmental surface/CIP solution for every five claimed. If both
- 582 environmental surfaces and CIP solutions are claimed as matrices, and only one is to be included
- 583 in the collaborative study, the environmental surface should be the chosen matrix.

584

Table 4. Number of matrices to be tested by each independent or collaborator site, as related to the number of claimed matrices.

Claimed matrices	1-5	6-10	11-15	16-20
Matrices tested by independent or collaborator labs	1	2	3	4

586

- 587 The selection of the specific matrices used in the collaborative studies should be reflective of the
- 588 range of difficulty and matrix category associated with the claimed matrices.

589 6.4 Test Materials

- 590 Appendix D requires a minimum of five materials be used in the collaborative study (13). Each
- 591 claimed matrix should be tested with at least one gluten source (per Tables 1 and 2) at a
- 592 minimum of four concentration levels, including zero.
- 593 Two blind-coded replicate test portions should be analyzed by each laboratory for each test
- 594 material (i.e., each matrix-concentration combination). For each matrix, the concentration levels
- 595 must include a blank (zero) and a level at less than or equal to two times the LOQ stated in the
- kit insert (as long as this is less than or equal to 20 mg/kg, otherwise test at 20 mg/kg). The
- remaining concentrations should be distributed throughout the quantification range. (14)
- 598 Incurred test materials are required for estimation of precision, LOD/LOQ, and recovery. *See*
- 599 **Annex B** for description of best practices for incurred matrix preparation.

600 6.5 Data Analysis

- 601 All individual data values must be reported.
- 602 Data analysis will be conducted according to the procedures described in Appendix D (13).
- 603 Specifically, the following must be performed and reported:
- 604 (1) Outliers should be evaluated as described in Appendix D (13).
- 605 (2) Recovery must be reported, with calculations using the known quantity of target present in
- 606 incurred test materials based on gravimetric calculations and accounting for any mass balance
- 607 changes occurring during food processing (e.g., moisture loss during baking).
- 608 (3) Precision estimates reported must include both repeatability (Sr and RSDr) and
- 609 reproducibility (S_R and RSD_R).
- 610 (4) LOD/LOQ.—LOD and LOQ will be estimated using reproducibility data (S_R and RSD_R).
- 611 Data collected from analysis of incurred test materials for all matrices will be used to model the
- 612 relationship between analyte concentration and reproducibility. Data used must meet other
- 613 method performance criteria (e.g., recovery).
- 614 LOD will be estimated using a hypothesis test approach, with $\alpha = \beta = 0.05$. The relationship
- between observed concentration and intermediate precision standard deviation must be taken into
- 616 account in the estimation of LOD (also referred to as a precision profile estimation method for
- 617 LOD). Full instructions for the calculations to estimate LOD are in Annex D.
- 618 LOQ estimation will be based on the relationship between concentration and intermediate
- 619 precision standard deviation. Full instructions for the calculations to estimate LOQ are in Annex
- 620 **D.**

621 6.6 Acceptance Criteria

- All parameter point estimates must meet any applicable requirements for confidence intervals
 established by the AOAC Statistics Committee or other relevant reviewers.
- 624 If an applicable SMPR is available for a method, the collaborative study data must meet the 625 corresponding criteria.
- 626 In the absence of an applicable SMPR, an expert review panel will evaluate the study data 627 according to their expert opinions.
- 628 (a) *LOQ*.—The LOQ must be greater than or equal to the LOD.
- 629 The RSD_R at the LOQ must be less than or equal to the RSD_R in the relevant SMPR. If there is 630 no SMPR available, RSD_R at the LOQ must be $\leq 30\%$.
- 631 If a method developer has an LOQ claimed as part of the method design (e.g., the lowest non-
- control calibrant), the estimated LOQ from the Collaborative Study (which meets the SMPR
- 633 requirements for maximum RSD_R) must be less than or equal to the claimed LOQ of the kit,
- 634 within statistical tolerances. If the estimated LOQ from the Collaborative Study is greater than
- the claimed LOQ of the kit, the method developer must revise the LOQ claimed in the test kit
- 636 insert and validation reports to meet the precision requirements for LOQ.
- 637 In the validation reports and test kit inserts, the method developers must indicate the actual RSD_R 638 value estimated for the LOO of the kit as part of the LOO information. For example:
- LOQ_{15} , for a method where the existing LOQ claimed by the kit had an estimated RSD_R of 15% in the Collaborative Study
- LOQ₃₀, for a method where the LOQ was set based on the Collaborative Study outcome and a
 maximum RSD_R of 30%
- Acceptance criteria for the maximum RSD also includes meeting requirements for confidence
 intervals, as established by the AOAC Statistics Committee.

645 6.7 Collaborator Comments

646 Comments on the candidate method should be encouraged from all collaborators, and any 647 comments should be reported in the collaborative study report.

648 **7. Matrix Extension**

649 7.1 Matrix Extension for SLV Studies

- 650 A single laboratory matrix study must be performed as described in 4.4, picking up where the
- laboratory left off in the gluten source tables (Tables 1 and 2). A matrix study must also be
- 652 completed by an independent laboratory, and reported, as described under **5.2**.

653 7.2 Matrix Extension for Multi-Site Collaborative Studies

- 654 A single laboratory matrix study must be performed as described in **4.4**, picking up where the
- laboratory left off in the gluten source tables (see Tables1 and 2). A minimum of eight
- 656 collaborator sites will perform the matrix studies as described under **6.3** and reported as
- 657 described under **6.5**.
- 658
- 659 **Documents Consulted**

- 660
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- 662 manuals/good-test-portions-and-goodsamples-resources/
- 663
- 664 FDA ORA-LAB 5.4.5 (2023) Volume II Methods, Method Verification and Validation,
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 Clinical and Laboratory Standards Institute, Wayne, PA, USA
- 704 (13) Official Methods of Analysis of AOAC INTERNATIONAL (2023) Appendix D: Guidelines for
 705 Collaborative Study Procedures to Validate Characteristics of a Method of Analysis, G.W.
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1	
2	ANNEX A
3	Selectivity Study
4	
5 6	Buy from reputable sources and ensure that you are getting the actual material, and that it's gluten free. This can be done by testing using an appropriate validated method.
7 8 9	If any of the matrices purchased as a flour are demonstrating unexpectedly high results, it may be necessary to purchase that material in a whole grain/seed/bean form and grind it in your own lab, in order to get a clean material that will give you a true estimation of cross-reactivity.
10 11 12	If you have information on the specific varietal tested, include that information in the validation report, as well as including the part(s) of the material that is tested (skin, flesh, stone, pit, etc.). For a multi-component matrix like pork sausage, provide all ingredients.
13	

Table A1. Gluten sources (materials should be tested at three times the LOQ, as long as that is equal to or below 20 mg/kg, in rice flour)

Wheat flour^a (*Triticum aestivum*)

Wheat flour^b (*Triticum compactum*) Durum wheat flour^b (*Triticum durum*) Einkorn wheat flour^b (*Triticum monococcum*) Emmer wheat flour^b (*Triticum dicoccon*) Khorasan wheat flour^b (*Triticum turanicum*) Spelt wheat flour^b (*Triticum spelta*) Triticale flour^b (*Triticosecale*) Oat flour^{a,c,d} (Avena sativa) Rye flour^a (Secale cereale)

Barley flour^a (*Hordeum vulgare*)

^a These may be omitted if they are being used as a gluten source in the validation matrix studies.

^b For all minor wheat species and Triticale, 20 ppm samples can be prepared using the protein-to-gluten conversion factor in Annex B, or the method developer may use the cited wet chemistry method to determine their own conversion factor. All methodology and findings must be included in the study report.

^c Oats are not regulated as a gluten source in all countries. See the definition of "Gluten", and the related footnote, in the main guidance document. If oats are not considered a gluten source for the test method undergoing validation, then oats should be moved to Table 2 and treated as a commodity for the cross-reactivity and interference studies.

^d Oats that are not comingled with wheat, rye or barley may be difficult to source. Whole oat groats may need to be ground to generate a pure oat flour sample.

14

15

Table A2. Commodities for cross-reactivity and
interference studies (materials should be tested as normally
purchased/used. Any processing should be described
(roasting, irradiation, etc.) ^a
Almond flour (Prunus dulcis)
Amaranth flour (Amaranthus spp.)
Arrowroot (Maranta arundinacea)
Black bean flour (Phaseolus vulgaris)
Beef meat (Bos taurus)
Brown rice flour (Oryza sativa)
Buckwheat flour (Fagopyrum esculentum)
Carob (Ceratonia siliqua)
Chestnut flour (Castanea sativa)
Chicken meat (Gallus gallus domesticus)
Cocoa
Coconut flour (Cocos nucifera)
Ground coffee (Coffea arabica or Coffea canephora)
Corn meal (Zea mays)
Dried fruits or raisins (Vitis vinifera)
Egg powder, chicken (Gallus gallus domesticus)
Faba bean flour (Vicia faba)
Flax seed flour/ meal (Linum usitatissimum)
Garbanzo bean/chickpea flour (Cicer arietinum)
Green pea flour (Pisum sativum)
Guar gum, dilute 1:10 in rice flour (Cyamopsis tetragonoloba)
Hazelnut flour (Corylus avellana)
Lentil flour (Lens culinaris)

Lima bean flour (Phaseolus lunatus)

Lupin Flour (Lupinus spp.)

Milk powder, cow (Bos taurus)

Millet flour (Panicum miliaceum)

Oat flour^{b,c} (Avena sativa), if not a claimed gluten source

Pea protein (*Pisum sativum*)

Peanuts (Arachis hypogaea)

Pork sausage (Sus domesticus)

Potato flour/starch (Solanum tuberosum)

Quinoa flour (Chenopodium quinoa)

Salmon (Oncorhynchus spp.)

Sesame flour (Sesamum indicum)

Sorghum flour (Sorghum bicolor)

Soya flour (*Glycine max*)

Spices (at least one from Table A3)

Sweet rice flour (Oryza sativa glutinosa)

Tapioca flour/starch (Manihot esculenta)

Tea, ground (Camellia sinensis)

teff flour (*Eragrostis tef*)

Walnuts (Juglans spp.)

White bean flour (Phaseolus vulgaris var. humilis)

White rice flour (Oryza sativa)

Yellow pea flour (Lathyrus aphaca)

Xanthan gum, dilute 1:10 in rice flour (from Xanthomonas campestris)

^a Adapted from Koerner et al. (2013) J. AOAC Int. 96, 1033–1040.

^b Oats are not regulated as a gluten source in all countries. *See* the definition of "Gluten", and the related footnote, in the main guidance document. If oats are not considered a gluten source for the testmethod undergoing validation, then oats should be moved to Table 2 and treated as a commodity for the cross-reactivity and interference studies. ^c Oats that are not comingled with wheat, rye or barley may be difficult to source. Whole oat groats may need to be ground to generate a pure oat flour sample

16

17

Table A3. Possible additional commodities (materials should be18 tested as normally purchased/used - any processing should be described (roasting, irradiation, etc.)

Carrageenan (dilute 1:10 in rice flour)

Cauliflower (Brassica oleracea var. botrytis)

Chia (Salvia hispanica)

Cinnamon (Cinnamomum verum)

Clove (Syzygium aromaticum)

Coriander seed (*Coriandrum sativum*)

Cumin (Cuminum cyminum)

Ginger powder (*Zingiber officinale*)

Hemp (Cannabis sativa)

Kidney bean flour (Phaseolus vulgaris)

Marjoram (Origanum majorana)

Paprika (*Capsicum annuum*)

Parsley flakes (*Petroselinum crispum*)

Poppy Seeds (*Papaver spp.*)

Protein sources (e.g., Duckweed (Lemna minor), insect, algal, fungal

Rye grass (Lolium perenne)^a

Romano bean flour (Phaseolus coccineus)

Sage (Salvia officinalis)

Sunflower kernels (Helianthus annuus)

Thyme (Thymus vulgaris)

Turmeric (Curcuma longa)

Urad Dal flour (Vigna mungo)

^a Subject to further research, this may be of interest as a gluten-like source.

1	
2	<u>ANNEX B</u>
3	Preparation of Materials for Gluten Method Validation
1	Until such time as reference materials are available, the gluten source for all prepared

4 Until such time as reference materials are available, the gluten source for all prepared samples 5 should be commercial, unbleached whole wheat, whole rye, whole barley, or whole oat flour.

The chosen flour should be analyzed for Dumas or Kjeldahl nitrogen. Convert to percent crude
protein by multiplying the nitrogen value by 5.83. Then convert to percent gluten by multiplying
the crude protein value by the following factors, depending on the grain:

- 9 Wheat 0.74
- 10 Rye 0.52
- 11 Barley 0.78
- 12 Oats 0.15

13 These conversion factors are suggestions and may vary across different grain samples. The

14 factors come from two publications (1, 2); the conversion factors for wheat rye and barley are

15 based on the wet chemistry method described in Wehling and Scherf (2). Method developers

16 may also use the wet chemical method in Wehling and Scherf (2) to arrive at the gluten content

17 for their own wheat, rye and barley flours.

- 18 Finally, convert the percent gluten to mg/kg (ppm) gluten by multiplying the result by 10,000.
- 19 As an example, a barley flour is tested and found to have a Dumas nitrogen level of 1.5%. This is

20 multiplied by 5.83 to attain a crude protein level of 8.75%. Using the conversion factor for

barley, the 8.75% crude protein is multiplied by 0.78 to obtain the gluten percent of 6.825%.

This percent value is then multiplied by 10,000 to estimate the mg/kg (ppm) value at 68,250.

23 This is equivalent to 68.3 mg of gluten per gram of flour.

24 B1. Making Spiked Materials

25 Bulk spiked materials may be prepared for the selectivity, stability and lot-to-lot studies, and

- bulk spikes of raw materials are often made prior to the processing steps when making incurred
- 27 samples.

28 These methods can be used for any material that has a small particle size or uniform consistency,

29 including flours, baking mixes, spices, meats, sauces, dressings, ice cream (melted), etc. They

30 can also be used in other matrices that can be dried and ground to a flour-like consistency, such

- 31 as nuts, seeds, and breadcrumbs.
- 32 Thorough blending is key to a successful trial. For dry materials like flours, or for liquid
- 33 consistencies, blending can be done in a blender or tumbler-style mixer, or even by manual
- 34 tumbling of material in a zippered plastic bag. Add the spike material uniformly within the

35 matrix, rather than adding it all in one location prior to blending it in. Making spikes in very fine

- 36 matrices with small particle size can be difficult, and re-milling of the matrix and spike may be
- 37 necessary to achieve particle size homogeneity. While gluten is not water-soluble, it can be
- 38 uniformly dispersed in sauces, dressings, and other liquids by either spiking directly with flour, 39 or making a suspension of gluten in the matrix, mixing it thoroughly to achieve uniformity, and
- 39 or making a suspension of gluten in the matrix, mixing it thoroughly to achieve uniformity, and 40 using this to make the spikes. Make sure to mix the material again before any samples are taken
- 40 using this to make the spikes. Make sure to mix the material again before any samples are taken 41 from it. For paste-like items and meats, spread the matrix out on aluminum foil, parchment, or
- 42 other non-stick surface, sprinkle the spike material uniformly across the top, and then recombine
- 43 the matrix and mix by kneading. Extremely high-speed or high-heat mixing can alter the gluten
- 44 results, so mechanical blending should be done in short pulses, and only for the duration needed
- 45 to achieve sufficient uniformity.
- 46 Liquid suspensions made in the kit extraction buffer can be used to spike individual test portions
- 47 for the interference portion of the selectivity study prior to extraction. Liquid spiking of test
- 48 portions may not be used for the matrix or other studies. If this method is used, state in the
- 49 validation report that the selectivity study only tests for analytical interference, not interference
- 50 with the extraction.
- 51 Options for adding gluten to the matrix, either as a spike or prior to processing of an incurred 52 matrix, include (*see* Figure B1):
- Creation of a mid or high-level stock followed by serial dilution. The gluten concentration in the stock should be chosen to allow the largest volume of stock material to be used in the preparation of each spike level.
- 56 2. Creation of mid or high-level stock used to then make each individual bulk preparation.
- 57 3. Creating bulk spike level samples directly from the source material (flour).
- 4. A combination of the above, in which spikes are made directly from the flour source for
 higher levels, then diluted to achieve lower levels).
- 60 The method for creation of each sample must be described in the report.
- 61 Any suitable validated quantitative method can be used to assess sample homogeneity. Assessing
- 62 homogeneity of the high or mid-level stock can be a good initial step before preparing lower-
- 63 level spikes. Homogeneity should be assessed for every bulk test material, or at least as many as
- 64 needed to confirm that the mixing procedure is adequate to minimize distributional variance.
- 65 Homogeneity should be assessed by testing 10 test portions, taken from throughout the material,
- 66 individually extracted, and run according to the method instructions of any validated quantitative
- 67 assay (e.g., use 2 wells if the method calls for it).
- 68 The preferred CV from the homogeneity data will depend on the method performance
- 69 requirements, with the homogeneity SD below the required repeatability SD. Higher CVs may be 70 expected at lower analyte concentrations.
- 71 Use the stocks for testing on the same day if possible. Samples made in dry matrices, like flours,
- 72 can be stored at room temperature for several days, remixing each stock thoroughly before use.
- 73 Samples made in perishable matrices (dairy products, meats) should be refrigerated for no more
- than 2 days, remixing each stock thoroughly before use. Samples may also be stored frozen in
- 75 working aliquot-sized portions for an extended period.

76 B2. Making Incurred Materials

- 77 The section above, *Making Spiked Materials*, describes the initial steps in making an incurred
- material. The spiking must occur prior to the major processing step in order for the end product
- to be considered an incurred matrix. Further considerations for common types of processing are
- 80 provided below

81 B2.2.1 Baked, Fried, or Dehydrated Materials

- 82 Baking, frying, and dehydrating are processing methods that can be reasonably replicated at a 83 small scale, in a laboratory. The same process applies for each.
- 84 When possible, weigh the incurred material before and after processing. Any change in the 85 analyte concentration above or below the expected value should be accounted for by the change
- 86 in mass.
- 87 When exact ppm values are needed, for example for a quantitative method, the moisture/weight
- 88 change from processing must be accounted for in determining the amount of spike material to be
- added. If the entirety of the material cannot be weighed before and after processing, additional
- analyses can be performed to determine the potential analyte gain or loss, such as moisture
- 91 content, protein, or zinc/other metals.
- 92 If moisture/weight change results in a slightly higher ppm value than intended, higher-level
- 93 incurred samples can be mixed with blank, processed sample to achieve various concentrations.
- 94 The lowest concentration achieved in this way should not be less than 10% of the concentration
- 95 of the high-level incurred material. Larger discrepancies require a second incurred matrix to be
- 96 made at a lower level.

97 B2.2.2 Pressure Treated/High Heat/Extruded

- 98 These are processes that cannot normally be replicated outside of a manufacturing facility. If a
- manufacturer is particularly interested in the development of the assay, the kit developer may be
- 100 able to partner with them to make gluten spikes on a pilot scale, using a similar method as
- 101 described above for baked, fried and dehydrated products.
- 102 In the absence of access to a manufacturing plant, some highly processed matrices can be
- 103 incurred through "fortification". An example would be a whole wheat puffed/extruded breakfast
- 104 cereal. A pilot plant could create a mid-level spike (100 ppm, for example), which could be
- 105 diluted down in a similarly processed blank matrix to create lower concentrations.
- Any validated method can be used to verify the absence of gluten in the non-gluten-containingmatrix.

108 B3. Making Environmental Surface Samples

- 109 Determine the surface area that's expected to be swabbed. Typical area is $25 \text{ cm}^2 100 \text{ cm}^2$
- 110 (approx. $4 \text{ in.}^2 16 \text{ in.}^2$)
- 111 Make suspensions from the flour in the kit extraction solution, or 60% ethanol solution.

- 112 Create solutions at gluten concentrations (μ g/mL) around the expected sensitivity level of the
- 113 method, as described in the validation requirements.
- 114 Pipette gluten suspension per outlined area, distributing the liquid as evenly as possible. Shake
- the suspension thoroughly before pipetting it into each square. Note the volume of solution
- added to each area, to allow the total μg of gluten per swab area to be calculated.
- 117 If the method is for swabbing of wet areas, the surfaces are ready for testing. If the method is
- 118 meant to test dried-on material, allow the gluten suspension to dry completely (overnight if 119 necessary).
- 120 Cleaning solution studies for an environmental surface claim are voluntary. Cleaning solution
- 121 studies are to be performed as described in the following section.

122 B4. Making Rinse Water/CIP/Cleaning Solution Study Samples

123 Make a high-level suspension of gluten in kit extraction buffer or 60% ethanol, then dilute into

124 water or water/cleaning solution to the desired gluten concentrations, around the expected

sensitivity level of the method, as described in the validation requirements. The high-level gluten

126 solution in kit extraction buffer or ethanol should not make up more than 1% of the final CIP

127 (cleaning solution)/rinse water preparation, to ensure that the sample is representative of a typical

128 CIP (cleaning solution)/rinse water sample. If the method is designed for rinse water testing, and

- 129 the cleaning solution will not be tested at its recommended working concentration, the dilution of
- 130 the cleaning solution must be reported.
- 131 Cleaning solution (CIP) validations must be performed separately for each cleaning agent.
- 132 Method developers may choose to perform a validation in examples from each of the four main
- 133 types of cleaning solutions: degreasers, detergents, abrasives, and acids. But the validation will
- 134 only be reported for the specific cleaning agent that is used.
- 135



137	Figure B1. Options for generating bulk spike materials at various levels.
138	
139	References (Annex B)
140 141 142	 (1) Schalk K., Lexhaller B., Koehler P., & Scherf K.A. (2017) <i>PLoS ONE</i> 12, e0172819. doi:10.1371/journal.pone.0172819
143	(2) Wehling, P. & Scherf, K.A. (2020) J. AOAC Int. 103, 210-215
144	
145	

Annex C

- 1 2
- 2
- 4 AOAC Triangle was reviewed and considered not to be relevant for gluten analysis.
- 5 For each material tested, specifics of the formulation and processing, including percent fat, protein and pH must be provided.
- 6 Refer to Codex food standard definitions http://www.fao.org/gsfaonline/foods/index.
- 7 FDA list https://www.cfsanappsexternal.fda.gov/scripts/fdcc/?set=FoodSubstances.
- 8
- Table C1.

		Not fermented, hy	drolyzed or fractior	ated				
F 1	D (: : 11	Processed/baked/		Pressure/heat-UHT/	DI 1 / 1/11 1/			
Food	Raw/minimally	cured/smoked/	Est al	pasteurization/	Dehydrated/dried/	Es mus sur és d	TT due leure d	Encodie a stad
category	processed	marinated	Fried	extrusion	dry cured	Fermented	Hydrolyzed	Fractionated
	Raw/minimally					Fermented	Hydrolyzed	Fractionated
Binders	Carrageenan					Xanthan gum, guar	Hydrofyzed	Tractionated
stabilizers,	Carrageenan					gum		
cinuismens		Processed						
Candy		Caramel, pralines, marzipan, nougats, Pastilles, Lozenges, jelly beans, toffees.						
		licorice, Chewing gum, Mints, Icing or Frosting						
		(non-chocolate), sauces used for toppings, non- chocolate (butterscotch						
		marshmallow)						
	Raw/minimally							
	processed	Processed, baked	Fried	Pressure/extrusion	Dehydrated	Fermented	Hydrolyzed	Fractionated
Cereal grains	Whole or milled Sorghum, soybeans, corn, millet, teff, rice, fonio, oats; baking mixes	Bread, cakes, cookies, tortillas, fresh pasta, bakery products, confectionaries, crackers, bagels, muffins, grain-based protein bars	Breaders/Batters for fish sticks and chicken nuggets, tortilla chips, donuts	Breakfast cereals, puffs/pellets	Breadcrumbs, dried pasta	Sourdough, malt, malt extract, sprouted flours, soy, oat or rice based yogurts, natto, tempeh, soy sauce, miso	Soy, oat, rice, or teff beverages (if hydrolyzed as part of processing); modified food starch.	Unmodified wheat starch, soy protein isolate, tofu, maltodextrin, soy lecithin

	Raw/minimally processed					
Chemicals and preservatives	Need to be validated per matrix					
	Raw/minimally processed	Processed				
Chocolate and cocoa	Cocoa nibs, cocoa mass,	Cocoa powder, cocoa sugar mixes, baking chocolate, chocolate chips, chocolate bars, chocolate syrup, cocoa butter, chocolate- hazelnut spread, chocolate frosting, enrobing chocolate, and similar carob-based products				
Cleaning solutions and rinses	Rinsates, CIP rinse - validate per cleaning solution					
	Raw/minimally processed			Dried		
Colors, flavors, and fragrances (other than those prepared as extracts)	Caramel color, caramel flavor, liquid smoke, beverage flavorings for water, coffee			Spirulina, beetroot powder, pitaya powder, acai berry powder, matcha green tea powder, turmeric, saffron, annatto extract		
					Fermented	
Cultured materials					Validate per culture strain	
	Raw/minimally processed	Processed	Pasteurized/ heated/UHT		Fermented	
Dairy products (high fat)	Raw butter, raw cream	Whipped cream, cream cheese, custards, puddings	Ice cream, canned creams		Raw or pasteurized greek yogurt, skyr, semi-hard cheeses (e.g., comte, beaufort), blue cheese (roquefort), soft cheese (e.g., brie, munster)	

Dairy products (not high-fat)	Raw milk (skim, part skim or whole), raw dairy-based drinks		Pasteurized dairy products, UHT milks, canned milks, pasteurized dairy- based drinks (chocolate milk, strawberry milk), ice milk	Condensed milk, evaporated milk, sweetened condensed milk, blends of condensed milk and vegetable fat (liquid or powdered beverage whiteners), khoa, milk powders, powder for milk- based desserts	Raw or pasteurized fermented milk, yogurt, buttermilk (dried, liquid), clotted cream, kefir, sour cream, cheese spray (dried/liquid), flavored yogurt drinks, lactic acid bacteria drinks (lassi), junket	Raw or pasteurized acidified milk, yogurt, buttermilk (dried, liquid), cheese spray (dried/liquid), chhena	Whey concentrate or isolate, casein, mill protein concentrate or isolate, whey-based drinks, whe cheese, ghea anhydrous milkfat, anhydrous butter oil, butter acids
		Processed		Dried	Fermented		
Dressings, condiments and marinades		Mayonnaise, mustard, pesto, ketchup, sauces, salad dressings, marinades, onion dip, chili sauce, sweet and sour sauce, barbecue sauce, cheese sauce, white sauce, gravies, oyster sauce, fish sauce		Sauce and gravy mixes	Vinegars, soy sauce		
	Raw/ minimally processed	Processed	Pasteurized	Dried			Fractionated
Eggs Environment al surface swabs	Shell eggs, whole eggs, egg yolks, egg whites Per surface	Quiche	Pasteurized whole egg pulp, Pasteurized egg whites	Dried whole egg, dried egg whites			Egg protein
						Hydrolyzed	
Enzymes						Validated per enzyme	
Extracts							Fractionated Acai berry extract, aloc extract, vanilla extract
	Pau/minimally						entitet

Fats, oils and fat emulsions	Virgin or cold- pressed olive oil, cottonseed, oil, peanut oil, vanaspati, almond oil, apricot kernel oil, coconut oil	Margarine, butterine, minarine	Lard, rendered animal fats, fishoils, tallow			Mono- and diglycerides	Wheat germ oil, basil oil, bergamot oil, carrot oil
	Raw/minimally processed	Processed	Heat treated	Dried			
Fish - shellfish - seafood	Fish, oysters, clams, scallops, mussels, shelled, shrimp	Frozen fish sticks, baked fish, Shelled and shucked products of cooked crustaceans, fish and seafood, roll herring, anchovies, smoked fish, imitation crab, imitation lobster	Canned fish, canned crab	Dried (salted) fish, bonito (dried)			
	Raw/minimally	Processed	Pasteurized/heat	Driad	Formonted		Fractionated
Fruits and vegetables (see colors category for fruits/vegeta bles used as coloring - see nutraceutical s for concentrates used as supplements)	Any raw or frozen fruits, Fruit mixes, potatoes, yams, sweet potatoes, cassava, dahlia, carrots, cruciferous vegetables, sprouts (eg alfalfa, soy, fenugreek, mung), fresh herbs (eg basil, cilantro, parsley); cassava flour, konjac flour, sago flour, bagged pre-cut leafy vegetables, salad mixes, shredded or riced vegetables	Juices, smoothies, blanched vegetable, fruit 'leather'	Pasteurized juices, canned juices, jams, jellies, marmalades, canned fruits and vegetables, apple butter, lemon curd, mango chutney, raisin chutney, candied fruit (e.g., maraschino cherries, candied citrus peel), fruit preparations (as for yogurt)	Dried Dried fruits (not coated in flour), air dried or freeze dried vegetable snacks (e.g., peas, chickpeas, sweet potato chips, beet root chips)	Fermented Fermented cabbage, pickles, pickled plums, mango pickles, pickled gooseberry		Syrups, inulin
			Pasteurized/heat/ UHT	Dried	Fermented	Hydrolyzed	Fractionated
Infant formula			FSMPs and liquid IMF (milk and plant based) high fat or high protein (for FSMPs)	Dehydrated milk, dehydrated yogurt	Spray-dried pre- blend, culture powders	Soy-based and plant-based formulas, milk- based formula and FSMP, amino-based IMFs	Probiotic whey-based formula, probiotic soy-based formula
	Raw/minimally processed	Processed	Pasteurized/ heat treated	Dried	Fermented		

Juices, soft drinks, beverages, edible ices	Sorbet	Sport drinks, energy drinks, carbonated drinks		Fruit juices, tomato juice	Juice concentrate, tea (dried), ground coffee	Beer, kombucha, wine, cider, perry, mead, spirits, sake, malt based coolers, seltzer	Prepared coffee, prepared tea
	Raw/minimally				Dried		Fractionated
Legumes	Processed Peanut, chickpea (garbanzo), pea, beechnut, pigeon pea, soybean, lima, adzuki, black, mung, cowpea, lentil, beans (fava, kidney, pinto, white), carob, lupin, mesquite				Pulses (dried beans, chickpeas, lentils, peas, soybeans); legume flours		Pea protein
	Raw/minimally processed	Processed/cured/ smoked/marinated	Fried	Heat treated	Dried	Fermented	Fractionated
Meat, game, and poultry	Carcasses, meat cuts, carpaccio's, minced meat, meat preparations ready to cook, frozen burger patties, marinated beef shish-kebab, seasoned portions	Roast beef, brisket, sausages, cooked ham, pate, cooked meats, cured meats (filet de sax), cooked filets, smoked poultry, corned beef, sausages, lunch meat, hot dogs, bologna	Par-fried (frozen) meat patties, Fried bologna	Canned poultry, Canned poultry pate	Jerky, cobourg ham, dry cured ham	Salami	Fish protein isolate, collagen, gelatin
	Raw/minimally				Dried		Fractionated
Non-seed crop materials	Barley grass juice, wheat grass juice,				Alfalfa powder, barley grass powder, wheat grass powder, oat hulls, rice hulls, dried algaes		Arrowroot starch, tapioca starch
						Fermented	
Nutraceutical s – dietary supplements						Vitamins, amino acids	
Pet food and animal feed							
						Fermented	

Probiotics					Validated per bacterial strain		
Pseudocereal s	Raw/minimally processed Amaranth, goosefoot, kaniwa, quinoa, hanza, chia, flax (linseed), breadnut,						Fractionated Flax protein, chia powder, hemp protein
	sesame, buckwheat						E
Seeds				Hemp, mustard, poppy, sunflower, pumpkin, pomegranate			Practionated Psyllium fiber, hemp protein
Soups, broths, stocks			Heat treated/UHT Bouillon, broth, consommé, water and cream-based soups, chowder, bisque, canned or bottled, aseptically packaged soups, broths, stocks (Tetrapaks)	Dehydrated Bouillon powder, cubed stocks, powdered soups, condensed soups			
	Raw/minimally			Dried			Fractionated
Spices	Salt, salt substitutes, onion salt, garlic salt			All dried spices (allspice, caraway, cardamom, celery seed, cinnamon, cumin, fenugreek			Allspice oleoresin, cardamom oleoresin, celery seed oleoresin
	Raw/minimally	Processed	Heat treated	Dehudrated		Hydrolyzed	Fractionated
Sugars/ sweeteners	Honey	Cane juice, xylitol, aspartame, saccharin, sucralose	Candy syrups	Coconut sugar, palm sugar, molasses, stevia		Invert sugar	Rice syrup
	Raw/minimally	Processed	Heat treated/UHT			Hydrolyzed	
Tree nuts (combine with seeds?)	Pecans, walnuts, almonds, hazelnuts, cashews	Almond butter, nougat, pecan shell flour, almond flour	Coconut milk, coconut cream, nut- based milks, whipped toppings, creamers, sour cream substitutes			Nut-based milks, whipped toppings, creamers, sour cream substitutes that have been enzymatically treated	
					Fermented	ucated	Fractionated

Yeast	Yeast (bakers,	Baker's yeast
	nutritional, torula),	glycan,
	yeast extracts, koji	baker's yeast
	(Validated per yeast	protein
	strain)	-
9		

3

ANNEX D

Statistical Methods for Quantitative Gluten Assays: Data Analysis Guidance and Example Datasets

4 1 Intermediate Precision and Repeatability Estimation From Nested Designs: Analysis of 5 Nested SLV Designs In R

- 6 (Courtesy of Paul Wehling, ChemStats Consulting LLC)
- 7 **1.1**

8 As is described in the guidance, intermediate precision and repeatability can both be estimated 9 from one of several nested designs.

10 **1.2 Basic Principles of the Nested Designs**

11 **1.2.1 Defining the Variance Components**

12 When validating a method with a nested experiment, it is strongly recommended that researchers

13 define terms used to describe the experimental factors. Because all methods are different, and

14 researchers tend to use different words to convey the same meaning, it is important to define

15 terms in order to avoid confusion. For example, in the largest design in the Guidance, Design

16 2b, there are potentially 4 levels of experimental factors that can be differentiated and estimated:

- 17 Lot, Analyst/Day, TP, and ELISA. Now in all designs, 1a, 1b, 2a, 2b, there is an explicit
- 18 understanding that Analyst and Day are confounded and will be included in the model as a single
- 19 factor. In addition, each of these levels may have many more sources of variation than just those 20 given by the 4 terms used. It is recommended to explicitly write out the sources of variation and
- how they contribute to the 4 variance components that will estimated experimentally. Nested
- 22 experiments are unique in this aspect. Generally, with a factorial experiment, you can control the
- 23 conditions so that only the interested factors are varied.

(a) *Terminology*.—"Source of variance" refers to a specific source of variation in the method for
 example, weighing variation. This refers to all of the small sources of variation that add together
 to make the overall measurement uncertainty.

- 27 "Variance component" is a statistical term for a collection of one or more sources of variation
- that will be estimated by the validation experiment. In this case, we will have 4 variance
- 29 components. The purpose of this exercise is to take all of the known sources of variation and
- 30 assign them to one of the 4 variance components. The distribution of sources of variation
- 31 depends on the experimental conditions and how the analyses were performed.
- 32 (b) Example of variance component description for a nested experiment of a typical ELISA
- 33 *method.*—*Note*: the following are for a hypothetical ELISA method ALL METHODS ARE
- 34 UNIQUE and will be different this should be performed for each method and each validation.
- *(1) Lot includes.*—Manufacturing variance of the lot, potentially different response of antibodies.
 Certain reagents are unique to each lot, so there will be reagent variance.
- 37 (2) Analyst/day includes.—Different operators, different times, different days, different teams,
- different environmental conditions in the lab, DIFFERENT CALIBRATIONS on different
 plates, different temperature.
- 40 (3) *TP includes.*—Test portion variation due to sampling, heterogeneity of the analytical sample
- 41 (compositional and distributional), weighing variation, volume addition variation, extraction
- 42 variation: time, temperature, water bath fluctuation. This variance component will include

- 43 everything that can happen within a set from weighing of the test portion until you are ready to
- 44 take the aliquot of the extract onto the ELISA plate.
- 45 (4) ELISA includes.—Aliquot variation, heterogeneity in the extract, reagent pipetting variance,
- 46 differences in coating of the wells, well-to-well sensitivity variation, rinsing issues, pipetting
- 47 volumes, different optical density of each well, reader issues, timing of color development, how
- 48 fast you pipet from start to finish, different development times across the plate.
- 49 In order to make the software work, you need to give a name to each of the 4 variance
- 50 components, with the understanding that there will be several sources of variation within each
- 51 variance component category. I suppose you could call them Level 1, Level 2, Level 3, Level 4,
- 52 but the usual way to do this is to take what you think is the most important source and use it as
- 53 the "name" of the variance component keeping in mind that the name is only a label and if you
- 54 call the 3^{rd} level "Test Portion" that doesn't mean that all those other sources are gone this is
- 55 just the Label we are using for convenience. (In these experiments, "Test Portion" will usually
- 56 always include extraction sources as well.)
- 57 (c) It's critical to do the categorization of variance sources into variance components for two
- reasons: First, it is important to define terms, but more importantly, it will come in handy to
- 59 determine if the factor is nested.
- 60 *Note*: If you only do the 3-factor experiments such as Design 1a or 1b, the variance components
- 61 above labeled as "TP" and "ELISA" will be combined into 1 component. So, you may call that
- 62 combined component "TP", but it will contain all of the ELISA variance sources in addition to
- 63 the other sources. (Maybe "TP" is not a good name for that in the 3-factor design.) Researchers
- are free to use any label for the name of the variance component, but this should always be
- understood that there are more sources of variation within a variance component than the one that is used as the label.

67 1.3 What is a "Nested" Experiment? When Can we Consider One Factor to be "Nested" 68 Within Another Factor?

- 69 Nested experiments are ones where you may have two or more factors involved and you have a
- 70 hierarchical order of nesting of factors. This would be different from a factorial design where the
- factors are varied independently, and the conditions for one factor can be adjusted to be the same at all the other factor levels. In the case where we are doing a variance component analysis of a
- 72 at an the other factor levels. In the case where we are doing a variance component analysis of a 73 method take for example the factor "Test Portion." Because each test portion is destroyed in the
- restruction, we can't really have the exact same test portions for kit Lot 1 as kit Lot 2, so TP will
- 75 always be a factor nested within some other higher level factor. In the same way, we pipet each
- restrict into 2 wells on the plate to estimate well-to well ELISA variance, since the 2 wells that
- are used for extract #3 cannot be reused for extract #4, again the factor ELISA is nested within
- the TP factor. Statisticians will say that for a factor to be nested, there needs to be a significant
- 79 "separation" in that factor across the different levels of the factor one level higher in the 80 hierarchy. Separation is achieved because the test portion is destroyed and can't be recovered. If
- 81 a factor is not nested then we say (some authors use this terminology) that the factors are
- 82 "crossed", meaning they need to be treated as a factorial design, such as a "2x2" factorial. It does
- 83 not mean to imply there are interactions fitted in the model. To avoid this confusion, some
- 84 authors refer to these 2 factors as "Main Effects." The area where this will be difficult in these
- 85 validation designs is the level that includes Analyst/Day/Calibration. For each method and
- 86 experimental design, we will need to determine if the Analyst/Day factor can be considered
- nested within the Lot factor, or if there is inadequate separation between Analyst/Days for one
 lot to another and so will have to be considered as 2 main effects. To make this easy, Lot will

always be a Main Effect at the top of the hierarchy, and TP and ELISA (if replicated) will always

90 be nested. The other easy thing is that the ANOVA calculations in R are simple, and R can do

91 the analysis either way, with a minor change to the code.

92 Proposed decision rules for determining nested variables are shown in Table D1.

93

Design	No. analysts	No. days	No. calibrations	Adequate separation?	Factor is
1a or 2a	2	2	1	No	Not nested
1a or 2a	2	2	2	No	Not nested
1a or2a	2	2	4	Yes	Nested
1a or 2a	4	4	2	Yes	Nested
1a or 2a	4	4	4	Yes	Nested
1b or 2b	2	2	1	No	Not nested
1b or 2b	2	2	2	No	Not nested
1b or 2b	2	2	6	Yes	Nested
1b or 2b	4	4	6	Yes	Nested

Table D1. Decision rules for determining nested variables

94

95 The idea in Table D1 is if you just have two analysts and 2 days, you can only have enough

96 separation for nested if you have a different calibration for each day/lot combination. If you

97 have four trained analysts in the lab and you can spare them, then you can get separation that

98 way. This is assuming calibration is the significant source of variation, which is usually the case

99 in ELISA methods. In fact, Day is usually always confounded with calibration for a traditional

100 ELISA. The case where there is a common calibration might be if there is a pre-calibrated kit

101 and the calibration is associated with the lot at the factory. If you can't get separation, it is not a

102 problem. You just need to differentiate before the analysis happens so you get the correct

103 ANOVA estimates.

104 **1.4 Model Statements in R**

105 For the nested ANOVA analysis, we will be using R package VCA, which was developed by

106 CLSI for doing method validation on clinical analyses. Information can be found at

107 https://cran.r-project.org/web/packages/VCA/index.html and https://cran.r-

108 project.org/web/packages/VCA/VCA.pdf

- 109 (a) Model statements in R have the general form.—
- 110

Response ~ terms

111 where "Response" is the numeric response vector and "terms" is a series of terms indicating the 112 predictor variables in some correct syntax dependent on the command being used.

113 For VCA package in general, we will use the following two types of model statements:

- 114 If Analyst is nested: Result ~ Lot/Analyst/TP
- 115 If Analyst is not nested: Result ~ (Lot+Analyst)/TP

116 The names used here such as "Lot," "Analyst," "TP" and "Result" are objects defined when the 117 data table is read into the software, and may change depending on the data table.

- 118 **(b)** *Example code for 3-level ANOVA (Designs 1a and 1b).*—
- 119Library(VCA)120Data1<- read.csv("Test Data A1b.csv")</td>121fit1<- fitVCA(form=Result~(Lot+Analyst), Data=Data1) # Analyst not nested within</td>122Lot
 - 123 fit2<- fitVCA(form=Result~Lot/Analyst, Data=Data1) # Analyst nested within Lot
 - 124 (c) Example code for 4-level ANOVA (Designs 2a and 2b).—
 - 125 library(VCA)
 - 126 Data2<- read.csv("Test Data A2b.csv")
 - 127fit1<- fitVCA(form=Result~(Lot+Analyst)/TP, Data=Data2) # Analyst not nested</th>128within Lot
 - 129fit2<- fitVCA(form=Result~Lot/Analyst/TP, Data=Data2) # Analyst nested within</th>130Lot

131 (d) Note in this package in R (as with most ANOVA procedures in R) you should not include the

132 lowest order factor in the model statement. If you do, the ANOVA table will be incorrect. It is

assumed that the lowest factor will be nested. The lowest order factor will be listed in theANOVA Table as "error."

135 **1.5 Example Code with Datasets**

136 **1.5.1 Data set A1a for Design 1a**

137 See Table D2.

Table D2. Design 1a Data set							
Lot	Analyst	TP	Well	Result			
1	1	1	1	120.6905			
1	1	2	1	108.5775			
1	1	3	1	118.6613			
1	2	1	1	101.8921			
1	2	2	1	106.5847			
1	2	3	1	110.5391			
2	1	1	1	100.3254			
2	1	2	1	109.5876			
2	1	3	1	108.2381			
2	2	1	1	99.84244			
2	2	2	1	95.70943			
2	2	3	1	97.8807			

139	Here. Analyst is a stand-in	variable name for A	Analyst/Day/Calibration	TP is the name for Test
157	incre, mary st is a stand in	variable flame for r	mary st/Day/Canoration,	II is the nume for fest

Portion/extraction. Since there was only 1 well per test portion, the variable "Well" is not reallya factor in the experiment.

142 **1.5.2 R-Code for Data Set A1a**

143	library(VCA)
144	DataA1a<- read.csv("Test Data A1a.csv")
145	fit1<- fitVCA(form=Result~(Lot+Analyst), Data=DataA1a) # Analyst not nested
146	within Lot
147	fit1
148	fit2<- fitVCA(form=Result~Lot/Analyst, Data=DataA1a) # Analyst nested within
149	Lot
150	fit2.nested
151	varPlot(form=Result~Lot/Analyst/TP, Data=DataA1a,
152	YLabel = list(text="Result", las=0, line=3, cex=1.5),
153	Title= list(main="GFA TEST DATA RESULTS PLOT SET A1a", cex.main=
154	1.75),
155	Points= list(pch=20, cex=2.50, col="blue"),
156	#MeanLine=list(var="int"),
157	MeanLine=list(var=c("Day", "int"), col="blue")

158 **1.5.3 Data Output**

159 See Tables D3 and D4.

Table D3. Data output-results: Analyst not nested within Lot

Result ~ (Lot+Analyst)				Analyst not nested within Lot				
	Name	DF ^a	SS^{b}	MS ^c	VC ^d	Total, % ^e	SD ^f	CV, %
1	Total	2.68720	95.9797			100	9.79692	9.19518
2	Lot	1	255.407	255.407	39.2024	40.8444	6.26118	5.87661
3	Analyst	1	239.698	239.698	36.5841	38.1165	6.04848	5.67697
4	Error	9	181.739	20.1933	20.1933	21.0391	4.49369	4.21768
Mean	106.5441	(N = 12)						

^a DF = Degrees of freedom.

^{*b*} SS = Sums of squares.

 c MS = Mean square error.

^{*d*} VC = Variance component.

 $^{\circ}$ Total, % = Percent of total variance contributed by factor.

f SD = Standard deviation.

160

Table D4. Data output-results: Analyst nested within Lot

Result ~ (Lot+Analyst)				Analys	st nested with	in Lot		
	Name	DFa	SS ^b	MS ^c	VC ^d	Total, % ^e	SD ^f	CV, %

138

1	Total	2.955354	77.6877			100	8.81406	8.27269
2	Lot	1	255.408	255.408	22.4709	28.9247	4.74035	4.44919
3	Analyst	2	241.164	120.582	32.6826	42.0693	5.71687	5.36574
4	Error	8	180.273	22.5341	22.534	29.0060	4.74701	4.45544
Mean	106.5441	(N=12)						

^a DF = Degrees of freedom.

^b SS = Sums of squares.

 c MS = Mean square error.

 d VC = Variance component.

 e Total, % = Percent of total variance contributed by factor.

f SD = Standard deviation.

161

162 Use the same code for Design 1b.

163 **1.5.4 Reporting of Precision Estimates**

164 For Designs 1a and 1b, the repeatability standard deviation (s_r) is equivalent to the square root of

165 the test portion variance component, reported as error SD in the ANOVA table.

166 In the example dataset where analyst is nested within lot, $s_r = 4.75$

167 For Designs 1a and 1b, the intermediate precision standard deviation (s_i) is equivalent to the

square root of the total variance component, reported as total SD in the ANOVA table.

169 In the example dataset where analyst is nested within lot, $s_i = 8.81$ (see Figure D1).



170

- 171 **Figure D1**. GFA test data results plot set A1a.
- 172 **1.5.5 Data Set A2b**
- 173 See Table D5.

Table D5. Data output of data set A2b

Lot	Analyst	TP	Well	Result
1	1	1	1	90.25167
1	1	1	2	89.92019
1	1	2	1	95.44815

1	1	2	2	95.56066
1	2	1	1	84.36506
1	2	1	2	84.57392
1	2	2	1	84.08832
1	2	2	2	84.13355
2	1	1	1	106.9066
2	1	1	2	107.2665
2	1	2	1	109.8504
2	1	2	2	109.1556
2	2	1	1	98.01522
2	2	1	2	98.28006
2	2	2	1	105.577
2	2	2	2	104.6931
3	1	1	1	91.38499
3	1	1	2	94.22005
3	1	2	1	97.7466
3	1	2	2	99.12495
3	2	1	1	92.57129
3	2	1	2	90.96285
3	2	2	1	94.02378
3	2	2	2	94.9194

1.5.6 R-Code for Data Set A2b

176	library(VCA)
177	DataA2b<- read.csv("Test Data A2b.csv")
178	fit1<- fitVCA(form=Result~(Lot+Analyst)/TP, Data=DataA2b) # Analyst not nested
179	within Lot
180	fit1
181	fit2<- fitVCA(form=Result~Lot/Analyst/TP, Data=DataA2b) # Analyst nested within
182	Lot
183	fit2
184	varPlot(form=Result~Lot/Analyst/TP, Data=DataA2b,
185	YLabel = list(text="Result", las=0, line=3, cex=1.5),
186	Title= list(main="GFA TEST DATA RESULTS PLOT SET A1b", cex.main= 1.75),
187	Points= list(pch=20, cex=2.50, col="blue"),
188	#MeanLine=list(var="int").
189	MeanLine=list(var=c("Day", "int"), col="blue")
190)

1.5.7 Data Output

192 See Tables D6 and D7.

194

Table D6. Data output for Analyst not nested within Lot, TP nested within (Lot+Analyst)

Result ~ $(Lot+Analyst)/TP$								
	Name	DF ^a	SS ^b	MS ^c	VC ^d	Total, % ^e	SD ^f	CV, %
1	Total	3.182687	92.85136			100	9.635941	10.04162
2	Lot	2	1109.537	554.7684	66.82999	71.97524	8.174961	8.519134
3	Analyst	1	207.8743	207.8743	15.64549	16.85003	3.955437	4.121965
4	Lot:Analyst:TP	8	161.0281	20.12851	9.752615	10.50347	3.122918	3.254395
5	Error	12	7.479314	0.623276	0.623276	0.671262	0.789478	0.822716
Mean	95.96	(N=24)						

^a DF = Degrees of freedom.

 b SS = Sums of squares.

 c MS = Mean square error.

 d VC = Variance component.

^e Total, % = Percent of total variance contributed by factor.

^f SD = Standard deviation.

Table D7. Data output for Analyst nested within Lot and TP Nested within Analyst

Result	~ Lot/Analyst/TP							
	Name	DF ^a	SS ^b	MS ^c	VC ^d	Total, % ^e	SD^{f}	CV, %
1	Total	2.958485	85.02862			100	9.221097	9.609313
2	Lot	2	1109.537	554.7684	59.10844	69.51594	7.688202	8.011882
3	Lot:Analyst	3	245.7025	81.90085	15.34189	18.0432	3.916872	4.081776
4	Lot:Analyst:TP	6	123.1998	20.53331	9.955015	11.70784	3.155157	3.287992
5	Error	12	7.479314	0.623276	0.623276	0.733019	0.789478	0.822716
Mean	95.96	(N=24)						

^a DF = Degrees of freedom.

^b SS = Sums of squares.

^c MS = Mean square error.

 d VC = Variance component.

^e Total, % = Percent of total variance contributed by factor.

^f SD = Standard deviation.

195

- 196 Use the same code for Design 2a.
- 197

198 **1.5.8 Reporting Precision Estimates**

199 Calculation procedures for repeatability standard deviation and intermediate precision from

200 Designs 2a and 2b depend on whether or not the standard method protocol requires measurement

201 of multiple ELISA wells for each test portion.

202 For instances where the standard method protocol requires the measurement of multiple replicate

203 ELISA wells (n) for each test portion, with the results averaged to give a single result, the

204 repeatability standard deviation (s_r) is the square root of the sum of the test portion variance

205 component and the ELISA variance divided by the number of replicate wells:

$$s_r^2 = s_{TP}^2 + \frac{s_{ELISA}^2}{n}$$

207
$$s_r = \sqrt{s_r^2}$$

In the ANOVA table, the test portion variance component is given as the VC for Lot:Analyst:TP.
 The ELISA variance component is given as the VC for the error row.

For the example dataset when analyst is nested within lot and test portion is nested within analyst:

212
$$s_r^2 = 9.96 + \frac{0.623}{2}$$

213
$$s_r = \sqrt{10.27}$$

214
$$s_r = 3.20$$

215 For instances where the standard method protocol only requires one ELISA well to be measured

216 for each test portion, the repeatability (sr) is the square root of the sum of the test portion

217 variance component and the ELISA variance.

$$s_r^2 = s_{TP}^2 + s_{ELISA}^2$$

$$s_r = \sqrt{s_r^2}$$

For the example dataset when analyst is nested within lot and test portion is nested within analyst:

222
$$s_r^2 = 9.96 + 0.62$$

223
$$s_r = \sqrt{10.58}$$

224
$$s_r = 3.25$$

For instances where the standard method protocol requires the measurement of multiple replicate ELISA wells (n) for each test portion, with the results averaged to give a single result, you will want to use designs 2a or 2b, and the intermediate precision standard deviation (s_i) is the square root of the sum of the lot variance component, the analyst variance component, the test portion variance component, and the ELISA variance divided by the number of replicate wells. Do not average the replicate wells before running the ANOVA:

231
$$s_i^2 = s_{Lot}^2 + s_{Analyst}^2 + s_{TP}^2 + \frac{s_{ELISA}^2}{n}$$

$$s_r = \sqrt{s_r^2}$$

For the example dataset when analyst is nested within lot and test portion is nested within analyst:

235
$$s_i^2 = 59.11 + 15.34 + 9.96 + \frac{0.623}{2}$$

236
$$s_r = \sqrt{84.72}$$

237
$$s_r = 9.20$$

- For instances where the standard method protocol only requires one ELISA well to be measured
- for each test portion (i.e., n=1), the intermediate precision standard deviation is equivalent to the
- square root of the total variance component, reported as total SD in the ANOVA table.
- For the example dataset when analyst is nested within lot and test portion is nested within analyst *see* Figure D2.
- 243

 $s_r = 9.22$

244



245

Figure D2. GFA test data results plot set A2b.

247 2 Limits of Detection and Limits of Quantitation Estimation

- 248 Limits of detection (LOD) and quantification (LOQ) should be estimated using methods that
- account for the relationship between concentration and variance commonly observed with
- 250 immunoassays (i.e., where variance increases with concentration), as described in IUPAC
- 251 recommendations (Currie 1999).
- 252 **2.1 LOD**

253 2.1.1 Data Required

Mean observed concentration and intermediate precision standard deviation from analysis of at least three analyte levels of each claimed matrix, including blank/zero.

256 2.1.2 Calculations

- Calculate mean concentration and intermediate precision standard deviation (S_i) for each test
 material.
- 259 Plot S_i versus observed mean concentration.
- 260 Perform linear regression (ordinary least square estimate or weighted least square analysis).
- 261 Calculate the LOD according to the following formula (where $\bar{x}_{(0)}$ = calculated mean result from
- blank samples, $S_{i(0)}$ = intermediate precision standard deviation of blank samples, and slope is
- 263 the slope from the linear regression above):

264
$$LOD = \frac{(\bar{x}_{(0)} + 3.3 \times S_{i(0)})}{(1 - 1.65 \times slope)}$$

- 265 Values used as estimates of $\bar{x}_{(0)}$ and $S_{i(0)}$ cannot be negative. If the $S_{i(0)}$ from the linear regression
- 266 (i.e., the intercept value) is negative, use the observed $S_{i(0)}$ from blank matrix samples. If the
- $\label{eq:second} 267 \qquad \text{observed } S_{i(0)} \text{ also seems unacceptable, use } S_i \text{ from the lowest concentration test material.}$
- 268 (a) Multiple matrices.—Plot S_i versus observed mean concentration for all matrices. It is
- 269 generally expected that the relationship between S_i and concentration will be sufficiently similar
- across matrices to conduct a single regression analysis for the combined data from all matrices.
- 271 Values used as estimates of $\bar{x}_{(0)}$ and $S_{i(0)}$ cannot be negative. If the $S_{i(0)}$ from the linear regression
- 272 (i.e., the intercept value) is negative, use the observed $S_{i(0)}$ from blank matrix samples. If the
- 273 observed $S_{i(0)}$ also seems unacceptable, use S_i from the lowest concentration test material.
- For estimation of $\bar{x}_{(0)}$, calculate the mean observed concentration across all blank matrices.
- 275 If the relationship between standard deviation and concentration appears to be substantially
- 276 different between matrices, consult with the AOAC Statistics Committee and Expert Review
- 277 Panel.
- 278 (b) *Example data and calculations.—See* Table D8 and Figure D3.
- 279

Table D8. Example data table

		0 ppm	0.5 ppm	1.0 ppm	2.5 ppm
Overall mean	x	0.04	0.612	0.882	2.395
Intermediate precision standard deviation	$\mathbf{S}_{\mathbf{i}}$	0.108	0.211	0.22	0.305
Intermediate precision relative standard deviation	%RSD _i	273.438	34.456	24.888	12.721





293

294

295
$$LOD = \frac{(\bar{x}_{(0)} + 3.3 \times S_{i(0)})}{(1 - 1.65 \times slope)}$$

297
$$LOD = \frac{(0.04 + 3.3 \times 0.1368)}{(1 - 1.65 \times 0.0755)}$$

- 298
- LOD = 0.56 ppm
- 300
- 301 2.2 LOQ

302 2.2.1 Data Required

303 Mean concentration and intermediate precision standard deviation values from above, linear 304 regression for S_i vs. concentration.

305 Model %RSD_i across a range of concentrations below and above the expected LOQ using linear

- 306 regression and $S_{i(0)}$ above.
- 307 Linear Regression: $S_i = slope \times concentration + S_{i(0)}$

308 %RSD_i Modeling: %
$$RSD_i = 100 \times \frac{(slope \times concentration + S_{i(0)})}{concentration}$$

309 Plot %RSD_i vs. mean concentration.

310 Estimate LOQ by calculating the concentration at which %RSD_i would meet acceptable levels

(e.g., maximum %RSD_i prescribed in an SMPR). The estimated LOQ must also be greater than
 the estimated LOD.

- 313 Values used as estimates of $S_{i(0)}$ should be the same as those used for the LOD calculations.
- 314 $LOQ = \frac{S_{i(0)}}{\left(\binom{\% RSD_i}{100} slope\right)}$
- 315 Prepare an operator characteristic (OC) curve for LOQ.—Use a normal distribution calculation
- 316 function to calculate the probability of obtaining a result higher than the LOQ for the given

317 concentration using the calculated S_i and assuming a normal distribution.

- Normal distribution curves can be estimated in Excel with the following function, where LOQ is set at the estimate calculated above, S_i is calculated according to the linear regression:
- $320 = 1 \text{NORMDIST}(\text{LOQ, mean concentration, } S_i, 1)$
- 321 Plot the probabilities versus concentration to prepare the OC curve.

322 2.2.2 Calculations/Procedures for Multiple Matrices

- 323 Model %RSD_i across a range of concentrations (as described above) for all matrices together. It
- is generally expected that the relationship between %RSD_i and concentration will be sufficiently
- 325 similar across matrices to conduct a single analysis for the combined data from all matrices.

- 326 If the relationship between standard deviation and concentration appears to be substantially
- different between matrices, consult with the AOAC Statistics Committee and Expert Review
- 328 Panel.
- *Example data and calculations.—See* Table D9 and Figures D4 and D5.



$$LOQ = \frac{S_{i(0)}}{\left(\binom{\% RSD_i}{100} - slope\right)}$$

336
$$LOQ_{30\%} = \frac{0.1368}{\left(\binom{30}{100} - 0.0755 \right)}$$

337
$$LOQ_{30\%} = 0.61 \, ppm$$



Figure D5. Probability of a quantitative result with LOQ = 061 ppm.

341

339

342 **3. Robustness Studies**

343 3.1 Quantitative Assays

For the purpose of the examples provided below, we are using hypothetical assays with written procedures that call for some or all of the following assay parameters, which will be referred to as "factors" going forward: a 2 g sample size, a 30-min extraction, an extraction temperature of 60°C, a diluted sample extract that is loaded onto the ELISA plate in a 100 microliter volume, a 1:10 dilution of the conjugated antibody in conjugate buffer, and/or a 20 min substrate (e.g., TMB) incubation. Remember that each factor should be varied both up and down by at least

350 20%.

351 Robustness study designs can be large, and may need to be broken up across test kits, operators,

352 days or other experimental conditions. The factorial treatment combinations (the Runs

353 comprising specific combinations of parameters as shown in the tables below) should be

assigned randomly to each set of conditions (test kit, day, operator, etc.).

355 (a) Full Factorial (2^{y}) Designs.—For assays with just a few factors to vary, a full factorial design

356 (also called a 2^y design) may be used. These designs allow for the analysis of the effects of

changes to each individual factor, as well as the analysis of any interactions between factors.

Examples of designs where two, three or four factors are varied are given in Tables D10–D12.

- The row labeled "N" at the bottom of each table describes the "normal" factor values for the assay, but this is only included for informational purposes and does not need to be tested as part
- assay, but this is only included for informational purposes and does not need to be tested as part
- of the experiment.

Table D10. Robustness study design example when varying 2 parameters

Run	Sample size, g	Extract time, min
1	1.5	20
2	2.5	20
3	1.5	40
4	2.5	40
N ^a	2	30

 a N = Normal factor values for the assay, but this is only included for informational purposes and does not need to be tested as part of the experiment.

362

Run	Sample size, g	Extract time, min	Extract temp., °C
1	1.5	20	45
2	2.5	20	45
3	1.5	40	45
4	2.5	40	45
5	1.5	20	75
6	2.5	20	75
7	1.5	40	75
8	2.5	40	75
N ^a	2	30	60

Table D11. Robustness study design example when varying 3 parameters

 a N = Normal factor values for the assay, but this is only included for informational purposes and does not need to be tested as part of the experiment.

363

Table D12. Robustness study design example when varying 4 parameters

Run	Sample size, g	Extract time, min	Extract temp., °C	Sample load, μL
1	1.5	20	45	50
2	2.5	20	45	50
3	1.5	40	45	50
4	2.5	40	45	50
5	1.5	20	75	50
6	2.5	20	75	50
7	1.5	40	75	50
8	2.5	40	75	50
9	1.5	20	45	150
10	2.5	20	45	150
11	1.5	40	45	150
12	2.5	40	45	150
13	1.5	20	75	150
14	2.5	20	75	150
15	1.5	40	75	150
16	2.5	40	75	150
N ^a	2	30	60	100

 a N = Normal factor values for the assay, but this is only included for informational purposes and does not need to be tested as part of the experiment.

364

365 **(b)** *Fractional factorial designs.*—When more than four factors are varied, a full-factorial 366 experiment can become prohibitively large. When varying five or more, a fractional factorial

- design, or "screening" design, can be used (see Tables D13 and D14). A limitation of these 367
- 368 designs is that some of the interaction effects may be confounded with each other. But if a
- resolution IV or V design is used, none of the main effects will be confounded with each other. The following are examples of 2^{5-1} and 2^{6-2} designs, for five and six factors respectively. The 2^{5-1} 369
- 370 ¹ design is a resolution V, and the 2^{6-2} design is a resolution IV, meaning that main effects are at
- 371 most confounded with 3rd-order or higher interactions. 372

Run	Sample size, g	Extract. time, min	Extract temp., °C	Sample load, μL	Conjugate dilution
1	1.5	20	45	50	1:8
2	2.5	20	45	50	1:12
3	1.5	40	45	50	1:12
4	2.5	40	45	50	1:8
5	1.5	20	75	50	1:12
6	2.5	20	75	50	1:8
7	1.5	40	75	50	1:8
8	2.5	40	75	50	1:12
9	1.5	20	45	150	1:12
10	2.5	20	45	150	1:8
11	1.5	40	45	150	1:8
12	2.5	40	45	150	1:12
13	1.5	20	75	150	1:8
14	2.5	20	75	150	1:12
15	1.5	40	75	150	1:12
16	2.5	40	75	150	1:8
N ^a	2	30	60	100	1:10

Table D13. Varying 5 factors in a 2^{5-1} design, resolution V

 a N = Normal factor values for the assay, but this is only included for informational purposes and does not need to be tested as part of the experiment.

373

374

2	7	5	
5	1	J	

Run Sample size, g Extract time, min Extract temp., °C Sample load, µL Conjugate dilution TMB time, min 1 1.5 50 1:8 15 20 45 2 2.5 20 45 50 1:12 25 3 40 50 1:12 25 1.5 45 4 2.5 40 45 50 1:8 15 5 1.5 20 75 50 1:12 15 6 2.5 20 75 50 1:8 25 7 50 25 1.5 40 75 1:8 8 2.5 75 50 1:12 40 15 9 1.5 20 45 150 1:12 25 2.5 10 20 45 150 1:8 15 150 1:8 15 11 1.5 40 45 12 2.5 40 150 1:12 25 45 13 1.5 20 75 150 1:8 25 14 2.5 75 1:12 20 150 15 15 1.5 40 75 150 1:12 15 2.5 75 25 16 40 150 1:8 2 Na 30 60 100 1:1020

Table D14. Varying 6 factors in a 2^{6-2} design, resolution IV

 a N = Normal factor values for the assay, but this is only included for informational purposes and does not need to be tested as part of the experiment.

376

377 Additional fractional factorial designs can be generated in R – see the instructions later in this 378 document.

379 (c) *Plackett-Burman designs.*—When more than six factors are varied, a Plackett-Burman design

380 may be needed. This type of design reduces the total number of experimental runs while still

allowing for the analysis of the main effects of individual factors. A concern with Plackett-

382 Burman designs is that the main effects of the individual factors are confounded with interaction

383 effects, so it can't be determined if any significant effects are due to changes in an individual

factor, or to that plus the changes in another factor. If it is important to discriminate between the

individual effects and interaction effects, then the few significant factors identified by the

386 Plackett-Burman design may be used in a separate full factorial experiment.

387 Examples of designs where seven or eight factors are varied are given in Tables D15 and D16

388 (our hypothetical method only had six factors to vary, so factors seven and eight are unnamed).

- 389 With this same 12-row design you may test up to 11 factors examples of this can be found in
- 390 the <u>NIST Engineering Statistics Handbook</u>
- 391 (https://web.archive.org/web/20220923135605/https://www.itl.nist.gov/div898/handbook/pri/sect
- 392 <u>ion3/pri335.htm</u>). The row labeled "N" at the bottom of each table describes the "normal"
- 393 parameter values for the assay, but this is only included for informational purposes and does not
- 394 need to be tested as part of the experiment.

Table D15. Varying 7 parameters in a Plackett-Burman design

Run	Sample size, g	Extract. time, min	Extract temp., °C	Sample load, µL	Conjugate dilution	TMB time, min	Factor 7
1	2.5	40	75	150	1:8	25	High
2	1.5	40	45	150	1:8	25	Low
3	1.5	20	75	50	1:8	25	High
4	2.5	20	45	150	1:12	25	High
5	1.5	40	45	50	1:8	15	High
6	1.5	20	75	50	1:12	25	Low
7	1.5	20	45	150	1:12	15	High
8	2.5	20	45	50	1:8	15	Low
9	2.5	40	45	50	1:12	25	Low
10	2.5	40	75	50	1:12	15	High
11	1.5	40	75	150	1:12	15	Low
12	2.5	20	75	150	1:12	15	Low
N ^a	2	30	60	100	1:10	20	Mid

 a N = Normal factor values for the assay, but this is only included for informational purposes and does not need to be tested as part of the experiment.

395

Table D16. Varying 8 parameters in a Plackett-Burman design

Run	Sample size, g	Extract. time, min	Extract temp., °C	Sample load, µL	Conjugate dilution	TMB time, min	Factor 7	Factor 8
1	2.5	40	75	150	1:8	25	High	High
2	1.5	40	45	15	1:8	25	Low	Low
3	1.5	20	75	50	1:8	25	High	Low
4	2.5	20	45	150	1:12	25	High	High
5	1.5	40	45	50	1:8	15	High	High
6	1.5	20	75	50	1:12	25	Low	High
7	1.5	20	45	150	1:12	15	High	Low
8	2.5	20	45	50	1:8	15	Low	High
9	2.5	40	45	50	1:12	25	Low	Low
10	2.5	40	75	50	1:12	15	High	Low
11	1.5	40	75	150	1:12	15	Low	High
12	2.5	20	75	150	1:12	15	Low	Low
\mathbf{N}^{a}	2	30	60	100	1:10	20	Mid	Mid

 a N = Normal factor values for the assay, but this is only included for informational purposes and does not need to be tested as part of the experiment.

396 **3.2 Result Reporting**

All results from the robustness study should be reported. Table D17 is an example result

table. This is a result table from a full factorial design that varied 3 parameters, with 5 replicates

399 per factorial pattern, but a similar table design can be used for any size full-factorial or Plackett-

400 Burman design.

Table D17. Robustness study example result table

				Test portion results – 20 ppm sample							
Run	Sample size, g	Extract time, min	Extract temp., °C	1	2	3	4	5			
1	1.5	20	45	10	11	9	10	8			
2	2.5	20	45	13	15	14	13	15			
3	1.5	40	45	9	8	10	9	8			
4	2.5	40	45	15	14	15	13	14			
5	1.5	20	75	8	10	9	8	9			
6	2.5	20	75	19	20	19	21	20			
7	1.5	40	75	14	15	13	15	14			
8	2.5	40	75	23	22	23	24	23			

402 **3.3 Study Analysis**

Both the factorial and Plackett-Burman designs can be analyzed using a linear regression orfactorial ANOVA.

405 The following is an example of performing a factorial ANOVA on the data set in Table D17,

406 using R and RStudio. R and RStudio are free, open access programs that can be used online at

407 <u>https://www.rstudio.com/products/cloud/</u>, or downloaded from <u>https://posit.co/download/rstudio-</u>
 408 <u>desktop/</u>. Because RStudio works by writing lines of code, it is helpful to shorten the names of
 409 the column headers.

410 In order to run the ANOVA, the data from Table D17 needs to be reoriented into a "long"

411 format, with each test result on its own individual row. When you enter the factor levels, remove

412 any lettering or special characters, and just enter the numbers. Figure D6 is an example of how

this might appear on an Excel sheet, but RStudio also allows you to upload data sets from text

414 files and other statistics programs, or to enter the data in manually (you can learn more about

415 using RStudio at https://education.rstudio.com/learn/beginner/). However you save your dataset,

416 you want to give it a short file name as well. In this example, we are naming the Excel file

417 "data1".



419 Figure D6. 3-factor study from Table 8, with data in the "long" format required for analysis in R

420 Once you have both R and Rstudio downloaded and installed, open RStudio and find the

421 Environment tab. Click on Import Data Set, then From Excel, and follow the instructions to

422 import your file. In the Environment window you should then see your data1 dataset, and if you

423 click the drop-down arrow to the left it will show you a data summary as shown in Figure D7.

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\$	Result	t:	num	[1:40]	10 11	9 10	8 13	16	14 :	13 1	5.	().			

425 Figure D7. Data summary view in R, of data from Figure 1

The following is a list of the commands you will enter to perform the analysis of variance. HitEnter after typing in each command.

428 >library(car)

429 >Anova(lm(Result ~ Size + Time + Temp, data = data1)

430 [in this line of code, "lm" is telling it to run a linear model; "Result" is your result column, the

431 dependent variable; "Size", "Time", and "Temp" are the column titles for your independent

432 variables, and "data1" is the name of your dataset]

433 The results of the analysis are displayed as shown in Table D18 below:

Table D18. Anova Table (Type II tests)

	Sum Sq	Df		F value	Pr(>F) ^a
Size	555.02	1		133.117	1.191e-13 ***
			3		
Time	38.02	1		9.1199	0.004629 **
Temp	225.63	1		54.1139	1.126e-08 ***
Residuals					

434

^a Signif. codes = 0 '***', 0.001 '**', 0.01 '*', 0.05 '.', 0.1 '

435 The p-values for each factor are shown in the Pr(>F) column. Significance is determined as

436 p<.05, but you have done three comparisons here, so you will want to make a Bonferroni

437 adjustment, and consider a factor to be significant when the p-value is less than 0.017 (i.e., 0.05

438 divided by 3). In this example, changes to each of the factors makes a significant impact on the

439 results. This means that the method instructions should warn the end user to avoid deviations in 440 any of these steps.

441 If you were analyzing more than the three factors, the code and commands would be the same,442 you would simply enter the additional column titles after the ~ sign using + signs in between.

If you were interested in seeing the interaction effects between each of the factors, you woulduse the following code:

445 >Anova(lm(Result ~ Size*Time*Temp, data = data1)

446 **3.4 Generating Fractional Factorial Designs in R**

447 You can generate additional fractional factorial designs in R using the following commands. The

448 example here is for a 2^{5-1} design, which has a level V resolution – this is the same example 449 shown in Table D13:

- 450 >install.packages("FrF2")
- 451 >library(FrF2)

452 >fivefactors <- FrF2(nfactors = 5, resolution = 5, randomize = FALSE)

453 [In this code, "fivefactors" is a name you make up to describe the table we are trying to generate,

454 nfactors is the number of factors you are varying, and resolution is your chosen resolution (you

455 will want to keep it at 4 or 5 to avoid having main effects confounded with each other).]

456 >summary(fivefactors)

457 [the summary command gives you the results of the analysis, shown below]

458 Call:

459 FrF2(nfactors = 5, resolution = 5, randomize = FALSE)

- 460 Experimental design of type FrF2
- 461 16 runs
- 462 Factor settings (scale ends):

	А	В	С	D	Е
1	-1	-1	-1	-1	-1
2	1	1	1	1	1

- 463 Design generating information:
- 464 \$legend
- 465 [1] A=A B=B C=C D=D E=E
- 466 \$generators
- 467 [1] E=ABCD
- 468 Alias structure:
- 469 [[1]]
- 470 [1] no aliasing among main effects and 2fis

471 The design itself is show in Table D19.

Table D19. Example study design export from R for a 2^{5-1} design with level V resolution

	А	В	С	D	Е
1	-1	-1	-1	-1	1
2	1	-1	-1	-1	-1
3	$^{-1}$	1	$^{-1}$	-1	-1
4	1	1	-1	-1	1
5	$^{-1}$	-1	1	-1	-1
6	1	-1	1	-1	1
7	$^{-1}$	1	1	-1	1
8	1	1	1	-1	-1
9	$^{-1}$	-1	-1	1	-1
10	1	-1	-1	1	1
11	-1	1	-1	1	1
12	1	1	$^{-1}$	1	-1
13	-1	$^{-1}$	1	1	1
14	1	-1	1	1	-1
15	$^{-1}$	1	1	1	-1
16	1	1	1	1	1

^a*Note*: In this result display, -1 indicates the lower level of the factor, and 1 indicates the higher level of the factor. Compare to Table D13.

472

473 class=design, type= FrF2.

474

475