



U.S. DEPARTMENT OF AGRICULTURE

Food Safety and
Inspection Service

1400 Independence
Avenue, SW.
Washington, D.C.
20250

April 3, 2026

Delivered by electronic mail:
Terry.arthur@fremonta.com

Terry Arthur, Ph.D.
Fremonta Corp.
1945 Kyle Park Court
San Jose, CA 95125

Dear Dr. Arthur,

This letter is in response to your request dated November 17, 2025 and revised on March 9, 2026 to receive a no objection letter to use the MicroTally Mitt (MT-Mitt) for other raw ground beef component sampling (FSIS Log No. 2025-0195).

Research data and scientific rationales provided by the Agricultural Research Service (ARS) demonstrate that sampling other raw ground beef components (hearts, head meat, cheek meat, and weasands) using the MT-Mitt provides organism recovery that is equivalent to or better than that of excision sampling.

FSIS has completed its review and has no objection to the use of the MT-Mitt for the sampling of other raw ground beef components of an establishment's robust HACCP verification sampling system provided establishments adhere to the following:

- The MT-Mitt is 10" x 10" and is composed of a spunbound olefin polymer, 2.25 oz. weight.
- When handling the MT-Mitt, use plastic sleeves and gloves sanitized with an alcohol-based sanitizer free of any quaternary ammonium compounds.
- Establishments may choose to use 25mL of a neutralizing buffer after the sample is collected if an antimicrobial intervention is applied to the other raw ground beef components prior to sampling.
- For sampling boxed, other raw ground beef components, the MT-Mitt may be used to sample up to 5 boxes by vigorously rubbing across the surface of the product and down 4-6 inches around the product pieces into each box, turning the MT-Mitt over at the halfway point for a total sampling time of 1.5 to 2 minutes.
- Once the sample is collected, the MT-Mitt should be placed in a sample bag and refrigerated until being shipped on ice overnight to the laboratory.
- Upon arrival at the laboratory, add an appropriate volume of bacterial growth media to the sample bag ensuring the MT-Mitt is submerged, then stomach for at least 30 seconds. Ensure MT-Mitt is pushed to the bottom of the bag, submerged in growth media, before incubation. Establishments and laboratories can support using a

bacterial growth media volume aligned with a validated methodology.

The establishment will need to reassess its hazard analysis based on the implementation of this new sampling methodology. The establishment should consider how its results may be affected by new methodology including variation in the surface area being sampled and interventions.

As described in the *Federal Register* Notice Vol. 70, No. 201, Pages 60784-60786, dated October 19, 2005, a summary description on your new technologies will be posted on the FSIS New Technology Information Table. If you do not object within five business days from the date that you receive this letter, the Agency will post the included description of the technology on the Web site. If you do object to the description, you should state in writing that you object to the description, explain the basis for your objection (for example, proprietary agreement, confidential commercial information, etc.), and provide an alternate description. FSIS will post the alternate description, unless the Agency concludes that the description does not fairly describe the technology. In such a case, FSIS will post the description that it prepared and will notify the company of its decision. FSIS will post the following summary description of your technology:

Case Number	Company Name	Summary of the Notification/Protocol
OPPD 2025-0195	USDA Agricultural Research Service, Fremonta Corporation	A method of sampling other raw ground beef components for pathogens and indicator organisms using a MicroTally Mitt

If changes are needed to this program, you must submit them to FSIS in writing for review and approval prior to implementation.

If you have any questions or would like to modify your SOP, please contact Scott Updike, Ph.D., by email at Michael.updike@usda.gov or by phone at (314) 679-6943.

Sincerely,



Selena Kremer-Caldwell, Ph.D.
Acting Director
Risk Management and Innovations Staff
Office of Policy and Program Development