Time as Public Health Control

Time is typically used in combination with temperature to control bacterial growth or toxin production in potentially hazardous foods and to prevent foodborne illness. Potentially hazardous foods may be held using time only, without temperature control for four hours or less. If time is not closely monitored, foodborne illness may result. *Time as Public Health Control* (TPHC) refers to using time only to monitor food, instead of time and temperature.

- Firm must have a written policy on using time as PHC and it must be available on request.
- All products/containers must be marked with the time by which food must be used or discarded.

**TPHC Guidelines:**
- Have written policy in place.
- Properly cool food if previously prepared, cooked, and refrigerated.
- Verify that foods under time control have an initial temperature of ≤41°F or ≥135°F.
- Mark all products or containers, *packaged or unpackaged*, with the time which is 4 hours past the time the food is removed from temperature control.
- Serve or discard food within 4 hours once removed from temperature control. Food **CANNOT** be saved for reuse.
- Once TPHC begins, **DO NOT** return foods to temperature control (hot or cold) for use at a later time. Time as PHC is a one way street; food cannot be held beyond the 4 hours even if food is returned to temperature control.
- Discard food in unmarked or improperly marked containers or packages.
- Discard food in marked containers or packages after 4 hours.
- Maintain written procedures in the establishment which contain a list of all TCS foods that will be held using time as PHC and have available for inspector review.

- **Provision for use of time as PHC for 6 hours for cold foods only:** In addition to the above guidelines,
  - Foods must have an initial temperature of ≤41°F when removed from temperature control and food **must be monitored** to ensure the warmest portion of the food does not exceed 70°F at any point during the 6 hours. Food shall be cooked, served, or discarded within a maximum of 6 hours.

**At a minimum, written procedures must include:**
- A list of specific food(s) that will be held using time as a public health control.
- Describe how the container will be marked to show when food will be cooked, served, or discarded within four or six hours. Foods, packaged or unpackaged, must be marked or otherwise identified to indicate the time which is 4 (or 6) hours past the point in time when food is removed from temperature control. The written procedures must explain the method used.
- Describe methods of compliance with proper cooling procedures for food that is prepared, cooked, and refrigerated prior to using time as a PHC.
- If using TPHC for up to 6 hours, must also show method for monitoring to ensure the warmest portion of the food does not exceed 70°F during the 6 hour period.

Effective written procedures communicate what the task is, where the task will take place, how and when the task will be performed, and who will perform the task.