

Time as Public Health Control (TPHC) Frequently Asked Questions

Q: What does it mean to hold food using “time as a public health control” only?

A: Using TPHC means that time is the only tool being used to monitor certain Time/Temperature Control for Safety (TCS) foods. The TPHC process is different than using a combination of time AND temperature, which means it has specific requirements to ensure food safety.

Q: What is a Time/Temperature Control for Safety (TCS) food?

A: TCS foods include any food that that require time and/or temperature controls to ensure food safety. A specific definition can be found in Section 010.852 of the [NNPH Food Establishment Regulations](#). You can also use this [TCS Foods Guidance Document](#). If you’re still not sure, reach out to your establishment’s regular inspector.

Q: Can I use TPHC with any TCS food?

A: TPHC is intended to be used with a working supply of TCS foods—if you don’t think you can use it in the right amount of time, keep it under temperature control until needed. TPHC can be used with TCS foods before they are cooked, such as raw bacon on a cook line or waffle batter at a self-serve breakfast bar. TPHC can also be used with ready-to-eat, TCS food that is displayed or held for service for immediate consumption, such as sushi rice, pizza, or potato salad.

Q: I have a TCS food that is ready-to-eat, but I’m planning to cook it as part of a recipe. Do I need to use TPHC?

A: Yes, if you are planning to keep the food item out of temperature control before it is added to your recipe, then you must use TPHC. This is a common question regarding cooked plant foods or cheese. Remember, if it is a TCS food, it must always be monitored using time and/or temperature—even if you are going to cook it as part of a dish.

Q: Are there any situations when I cannot use TPHC?

A: Food establishments CANNOT use TPHC to hold raw eggs if they serve a highly susceptible population, such as young children, the elderly, or immunocompromised individuals. Food establishments also CANNOT use TPHC as a back-up for the failure of temperature control equipment. A good rule of thumb is to not use TPHC until you’re sure it’s right for your establishment’s situation and you’ve developed your establishment’s procedure.

Q: I want to use TPHC in my food establishment. What do I need to do to get started?

A: The first thing you should do is write your TPHC procedures. TPHC written procedures must be available for review and kept on-site at all times. All TPHC written procedures must include:

1. A list of the food items being held using TPHC
2. A statement that the clock starts when the food items are removed from cooking, refrigeration (41°F or below), or hot holding (135°F or below)
3. A description of how the food items will be marked to ensure they are not held longer than the time limit
4. A description of the corrective action that will be taken if the food item is not marked, exceeds the designated time limit, or, if applicable, exceeds 70°F at any point during the holding period.

Additionally, food establishments can customize and use TPHC written procedure templates for the 4-hour and 6-hour holding times, which are provided by the Northern Nevada Public Health (NNPH) on the Food Safety Resource Library.

ENVIRONMENTAL HEALTH SERVICES

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Q: What happens if I haven't written my procedures down, but I have been using TPHC in my establishment?

A: When you are using TPHC in your establishment, you must have written procedures available for review and kept on-site at all times. Establishments that are using TPHC without written procedures will receive a violation on their inspection report and will be required to keep all TCS foods under temperature control.

Q: Do my written procedures need to be approved by Northern Nevada Public Health or my regular inspector before I start using TPHC?

A: No, pre-approval of written procedures is not required; however, written procedures must be prepared in advance of using TPHC and be available for review during your routine inspection.

Q: How do I know which TPHC procedure is right for me?

A: When deciding what TPHC procedure is right for your establishment, it is important to consider:

1. What food items do you intend to hold using TPHC?
2. How will each food item be prepared prior to being held using TPHC?
3. How will the food items be served to the customer?
4. Who will be responsible for ensuring TPHC procedures are being followed?
5. Which procedure is the most realistic for your establishment at its busiest time of day?

Take some time to consider these questions and write down your answers. If you're still not sure, be prepared to readily share your answers to the above questions and consult with your regular inspector.

Q: How can I make sure that TPHC is being used properly in my establishment?

A: Establishments should post the TPHC written procedures for food handlers to reference if needed and many establishments also keep a [TPHC Log](#) to track the proper use of TPHC. However, the best way to ensure that TPHC is being used properly is to provide training for every staff member. Sharing food safety information and procedure is the responsibility of the manager and/or the establishment's Certified Food Protection Manager (CFPM). For information on CFPM certification, check out the [CFPM FAQ](#) on the Food Safety Services website.

Q: I took the food item out of temperature control, but it's not in the temperature Danger Zone (41°F - 135°F). Can I wait to start time monitoring until it is in the Danger Zone?

A: No. The TPHC clock starts when the product is removed from the temperature control (cooking, refrigeration, or hot holding). In specific cases, the TPHC clock starts when a ready-to-eat food is rendered a TCS food through some action. Only in these cases can the food item have an initial temperature of 70°F or less.

Q: How is a ready-to-eat food rendered at TCS food? How does this affect TPHC?

A: Certain foods are not considered TCS until they are changed through some action, specifically:

1. Food items that are ready-to-eat and stored in hermetically sealed packages become TCS foods when the package is opened
2. Leafy greens, melons, and tomatoes become TCS foods when they are cut
3. Plant foods become TCS foods when they are cooked or heat-treated

In Situations 1 and 2, the TPHC time clock must start when the food item is rendered a TCS food, i.e., when the hermetically sealed package is opened or when the whole fruit/vegetable is cut. The food item's initial temperature may be 70°F or less and can be held using TPHC for a maximum of 4 hours, as long as the temperature does not exceed 70°F at any point within that time limit. Cooked/heat-treated plant foods (Situation 3) must be appropriately cooled or hot-held before being held using TPHC and CANNOT have an initial temperature of 70°F or less.

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Q: Can I save food items held under TPHC if I don't use all of it in the required time period?

A: No. Once the TPHC clock has started, food items cannot be returned to temperature controls (refrigeration, reheating, hot holding, or freezing) to be saved and served later. All food items held under TPHC must be cooked, served, or discarded within the required time period.

Q: How do I use TPHC if I mix different batches of food in the same container?

A: Mixing different batches of food in the same container should be avoided. However, if different batches are mixed in the same container, use the earliest time as the time by which all the food in the container must be cooked, served, or discarded.

Q: What information should be on the labels I use to mark food items held using TPHC?

A: Food establishments must label all food items that are held using TPHC. Labels must indicate the time at which the designated TPHC time period ends, and any unserved food must be discarded. On the same label, many establishments also include what the food is, the time that the TPHC time period began, and/or the date.

Q: How can I get help with developing and using TPHC at my establishment?

A: Food establishments are encouraged to contact their regular inspectors for guidance regarding TPHC or any food safety practices. The following are additional resources available on the [Food Safety Services website](#)

1. Review the TPHC regulations in Section 050.330 of the [NNPH Food Establishment Regulations](#)
2. Reference and use the 4-Hour and 6-Hour TPHC Written Procedures and [TPHC Log](#) templates
3. Send your questions to the NNPH Food Safety Team at foodsafety@NNPH.org
4. Call the NNPH Environmental Health Services front desk at (775) 328-2434 option #8 to be directed to an inspector who can help answer your questions

For Information and Resources:

Access TPHC templates and more food safety information on NNPH's [Food Safety Resource Library](#).



Access the [NNPH Food Establishment Regulations](#).

