

## Time as Public Health Control (TPHC) Frequently Asked Questions

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

- Time only is used to monitor potentially hazardous foods instead of time and temperature.

### What kind of foods can be held using TPHC?

- A working supply of potentially hazardous food before cooking (e.g. raw eggs\* on a cook-line, or waffle batters at self-service breakfast bar).

**\*Note:** TPHC **CANNOT** be used to hold **raw eggs** by a food establishment that serves a highly susceptible population.

- Ready-to-eat potentially hazardous food that is displayed or held for service for immediate consumption, e.g. sushi rice, pizza, egg rolls, spring rolls, pasta salad

### What procedures do I need to have in place BEFORE using TPHC?

- Written procedures that are kept in the food establishment, made available for review, and contain the following information:
  - List of all foods items that will be held using TPHC
  - If foods are prepared, cooked and refrigerated before TPHC, describe cooling methods as per [Sections 050.300 – 050.305](#) of the regulations.  
**Note:** foods must be completely cooled to **41°F or less** prior to using TPHC
  - Describe procedures to verify that foods held using TPHC are:
    - Removed from temperature control at **41°F or less** and subsequently held at room temperature for no more than **four hours at which time food is served or discarded, or**
    - Removed from temperature control at **135°F or greater** and subsequently held at room temperature for no more than **four hours at which time food is served or discarded, or**
    - Removed from temperature control at **41°F or less**, and subsequently held at room temperature for no more than **six hours** as long as food is **actively monitored** (e.g. temperature measured every 30 minutes) to ensure the temperature does not exceed 70°F, **and food product is served or discarded after the six hours.**
  - Describe procedures to mark (or otherwise clearly identify) food containers with either the time the food was removed from temperature control, or the time at which the food must be served or discarded
  - Describe procedures to ensure food will be cooked and served, served if ready-to-eat, or discarded within four hours (or six if actively monitored at ≤ 70°F) of being removed from temperature control



## Time as Public Health Control FAQs

- Describe corrective action procedures to ensure foods found in unmarked containers, improperly marked containers, or containers that have exceeded the 4 (or 6 ) hour time limit are discarded
- Identify who is responsible for each task

### **Can I wait to start the four hour (or six hour) time monitoring when the food product enters the Danger Zone (41°F - 135°F)?**

- No, TPHC does not begin when the product enters the Danger Zone, but rather when the food product is removed from hot or cold holding.
  - For example: Sushi rice removed from rice cooker at 180°F, transferred to another container, cooled for approximately 30 minutes and mixed with vinegar and salt prior to being placed on the service line at 135°F shall be marked to indicate the time that is four hours past the point in time when the sushi rice was removed from the rice cooker at 180°F.

### **Do my written TPHC procedures need prior approval by the Washoe County Health District (WCHD)?**

- Pre-approval of written procedures by the WCHD is not required with the exception of those facilities that were specifically contacted by the WCHD to validate procedures for holding sushi rice at room temperature.

### **What happens if I haven't written my procedures down, but I am using TPHC?**

- If you don't have written procedures that contain at least the minimum required information, you will receive a violation on your inspection report and you will be instructed to keep all potentially hazardous foods under appropriate temperature control.

### **Can foods held under TPHC be saved and served later?**

- Once TPHC begins, foods **cannot** be returned to temperature control (e.g., refrigerated, frozen, reheated, or hot held) to be saved and served later and must be served or discarded within the required time period.

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

- Mixing different batches of food together 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.

### **How can I get help in developing my TPHC procedures?**

- Food establishments are encouraged to work with their regular inspectors to develop procedures that will comply with TPHC requirements. Contact your inspector regarding procedures, tools, and resources.