

## 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 food means a food that requires time and/or temperature control to limit the growth of pathogenic microorganisms or the formation of toxins. These controls are necessary to keep food safe for human consumption. According to the **2013 FDA Food Code**, TCS foods include:

- Animal-based foods that are raw or heat-treated (e.g., meat, poultry, milk, eggs, fish, shellfish).
- Plant-based foods that are heat-treated or consist of raw seed sprouts, cut melons, cut leafy greens, or cut tomatoes/tomato mixtures.
- Garlic-in-oil mixtures that are not properly acidified or otherwise modified to prevent pathogen growth.
- Other foods designated as TCS based on laboratory evidence or risk assessments showing they support rapid pathogen growth if not kept under proper temperature control.

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 CANNOT use TPHC as a back-up for the failure of temperature control equipment.

This provision only applies if it is the actual intention or conscious decision to store TCS food out of temperature control using TPHC; otherwise, it may be a cold or hot holding issue. 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 labeled to ensure they are not held longer than the time limit. Label will include the date, time food was removed from temperature control, and the time the food will be discarded if not used within 4 hours.
4. A description of the corrective action that will be taken if the food item is not marked, exceeds the designated time limit.

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.

**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 the Anchorage Health Department 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 can I make sure that TPHC is being used properly in my establishment?**

**A:** 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).

**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. TPHC starts when the product is removed from the temperature control (cooking, refrigeration, or hot holding). In specific cases, TPHC 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 in the Danger Zone.

**Q: How is a non-TCS food rendered a TCS food? How does this affect TPHC?**

**A:** Certain foods are considered non-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

**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 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. Container should then be washed, rinsed, and sanitized before adding additional food.

**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 that the TPHC period began, 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.

**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 Resource Library;

[Time as a Public Health Control](#)

[Template for TPHC written Procedures](#)

[Temperature Danger Zone](#)