

Time as a Public Health Control



Food establishments have the option to use time as a public health control instead of using temperature as the control against the growth of microorganisms. This means a food item that would normally be kept hot or cold may be safely kept at any temperature, even room temperature, for a certain length of time.

The temperature danger zone is between 41°F and 135°F. Foods that require temperature control may be held in the temperature danger zone for a maximum of four hours, **ONLY** if several procedures are in place. Once four hours have passed, any of the remaining foods must be discarded for safety. To implement time as a control, the establishment must first set up written procedures, have a method for tracking the discard times for the food items, and train their employees in proper handling procedures for using time as a control.

WRITTEN PROCEDURES:

The written procedures may be as simple as a statement explaining how your establishment uses time as a control. The procedures should include which items you hold using time as a control. The procedures must address how long you will keep the items, what you do with the leftover items that reaching the time limit, what to

do with unmarked items, and how you will track the times for the items. The written procedures must be prepared before beginning to use time as a control, must be kept at the establishment, and must be provided to the inspector upon request.

TIME TRACKING:

The time the food items are being held in the temperature danger zone must be tracked. Cold foods must be 41°F or below prior to beginning time as a control. Hot foods must be 135°F or above prior to beginning time as a control. The clock starts when the food is removed from temperature control. The discard time must be recorded. The time can be written on the food container, a white board, or a paper log sheet, or you can use a timer. Any method used must be available at all times for any items used with time as a control. Memory doesn't count! The time record must be provided upon request. The time stamp must be tied to the food item. The best idea is to record the time the food was removed from temperature control in addition to the discard time.

EMPLOYEE TRAINING:

All employees working with the foods used with time as a control must know how to use the time as a control procedures. They must be properly trained to record the times, monitor the time the product is out, and ensure the product is discarded once the time limit is up.

FREQUENTLY ASKED QUESTIONS

Q: Can I keep the food out for less than four hours, cool it back down, and keep it instead of throwing it away?

A: No, you may not hold your food products in the temperature danger zone and then keep the food. It may be safely held outside of temperature control for a maximum of four hours. You may use it, serve it, and sell it during that four hour time limit. Once that time limit is up, any remaining food must be thrown away.

Q: Can I replace the old product with fresh product part way through?

A: If you mix new product with the previous product or put it in the same container as the previous product without cleaning and sanitizing the container, the original four-hour time limit will apply to the new product. You may put out fresh product in a different container start with the full time allowance. Do not put the fresh product in the old unless the container is properly washed, rinsed, sanitized, and air-dried first.

Q: Can I ever keep it under time as a control for more than four hours?

A: Yes, under certain circumstances. You may use a six hour hold time for cold items that are 41°F or less when removed from temperature control and remain at 70°F or below. This is above the usual cold holding temperature (41°F), but still at a temperature where bad bacteria will grow more slowly. If this six hour hold time is used, all of the same rules apply, but the written procedures and time records must also address the six hour hold time. In addition, the temperature must be monitored throughout the hold time to ensure it is staying under 70°F or be kept at an ambient temperature that ensures it stay below 70°F. If the product goes over 70°F, then it must be discarded immediately. The written procedures must explain how this temperature is maintained to ensure the food temperature stays below 70°F. A hot food item may not be held for six hours using time as the control. Hot foods may only be held using the four-hour time limit.

Q: Can I hold a food for less than four hours?

A: Yes. Many establishments choose to hold products for a shorter time period, usually for quality purposes. Foods that exceed internal quality holding times will not be considered a violation as long as the regulatory holding time is not exceeded.



Kansas Department of Agriculture FOOD SAFETY FACT SHEET

Kansas Food Code Reference 3-501.19

Time as a Public Health Control

PROCEDURE:

Choose the marking/tracking method:

- All containers are marked with:
 - The time the item was removed from temperature control
 - The temperature of the item when removed from temperature control
 - The discard time
 - 4 Hours after removal from hot holding — the food must be 135°F (57°C) or greater
 - 4 Hours after removal from cold holding — the food must be 41°F (5°C) or less
- A TPHC log is used. The log contains:
 - The name of the item
 - The time the item was removed from temperature control
 - The temperature of the item when removed from temperature control
 - The discard time
 - 4 Hours after removal from hot holding — the food must be 135°F (57°C) or greater
 - 4 Hours after removal from cold holding — the food must be 41°F (5°C) or less

List the food items used with TPHC:

- Hot Holding (4 Hours) — removed from hot holding — the food must be 135°F (57°C) or greater

- Cold Holding (4 Hours) — removed from cold holding — the food must be 41°F (5°C) or less
