



Consumer & Industry Services

Tennessee Department of Agriculture

TIME AS A PUBLIC HEALTH CONTROL

The purpose of this fact sheet is to provide information regarding using Time as a Public Health Control (TPHC). Please refer to the [Retail Food Sanitation Code 0080-04-09-.03 \(6\)\(c\)](#), for complete TPHC information.

What does it mean to hold foods using “TIME” only?

Using time to monitor food is called **Time as a Public Health Control (TPHC)**.

What types of FOOD can be held using TPHC?

1. **A working supply of TCS foods before cooking**
2. **Ready to eat TCS that is displayed or held for sale or service**
 - Time as a Public Health Control MAY NOT be used for **raw eggs** by a food establishment that serves a highly susceptible population, such as a nursing home or child care center.

Food establishments can hold TCS foods for up to:

- **Four hours:**
 1. Initial temperature of 41° F or less, **OR** Initial temperature of 135° F or greater.
 2. Food is marked or otherwise identified to indicate the time that is 4 hours past the point in time that the food was removed from temperature control.
 3. Food is served or discarded within 4 hours.
 4. Food in unmarked containers or past the four hour time period shall be discarded by the food establishment.
- **Six hours:**
 1. Initial temperature of 41°F or less.
 2. Food shall be monitored to ensure the temperature does not exceed 70°F.
 3. Food is marked or otherwise identified to indicate the time that is 6 hours past the point in time that the food was removed from temperature control.
 4. Food is served or discarded within 6 hours.
 5. Food in unmarked containers or past the six hour time period shall be discarded.

Definitions:

Time/Temperature control for Safety (TCS): Formerly called “*Potentially Hazardous Foods*,” TCS foods require time/temperature control for safety to limit pathogenic microorganism growth or toxin formation.

Examples of TCS foods:

- Animal food that is RAW or HEAT-TREATED
- Plant food that is HEAT-TREATED
- RAW seed sprouts
- CUT melons
- CUT leafy greens (variety of lettuce, cabbage, spinach)
- CUT tomatoes or mixtures of CUT tomatoes (ex: salsa)



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What do I need to have in place before using Time as a Public Health Control (TPHC)?

1. Maintain written procedures:
 - Kept in the food establishment and made available for review
 - Contains a list of all TCS FOODS that will be held using Time
2. Verify that foods held under time control have an initial temperature of:
 - 41°F or less ,or 135°F or above, for four-hour TPHC
 - 41°F or less and monitored to ensure the temperature does not exceed 70°F for six-hour TPHC
3. Procedures to mark containers with either the time food was removed from temperature control or the time at which the foods must be served or discarded.
4. Serve or discard food within four (or six) hours once removed from temperature control.
5. Procedures to ensure any food in unmarked or improperly marked containers or packages is discarded.
6. Procedures to ensure any food in marked containers or packages after four (or six) hours is discarded.

Frequently Asked Questions (FAQ)

What information should be included in the written procedures?

At a minimum, **written procedures must** include the following:

1. List specific food(s) that will be held using time as a public health control.
2. Describe *how* the container will be marked to show *when* food will be cooked, served, or discarded within four or six hours.
3. Foods can be marked with the time that they were removed from temperature control OR the time by which the food must be served or discarded. The written procedures must explain the method used.



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Do my TPHC written procedures need to be pre-approved by the Tennessee Department of Agriculture?

No. Pre-approval of written procedures by the Department of Agriculture is not required.

Can foods held under Time as a Public Health Control be saved and served later?

No. Once TPHC begins foods cannot be saved and served by the food establishment past the four or six hour period. All foods under TPHC must be served or discarded within the required time period.

How do TPHC requirements apply if I mix different batches of food in the same container?

Avoid mixing different batches of food together in the same container. If you do mix batches, use the earliest time as the time by which to serve or discard all the food in the container.

What 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 must keep all TCS foods under appropriate temperature control (below 41°F or above 135°F)

Example of acceptable written TPHC procedures:

XYZ Restaurant / Market -Deli will use TPHC for the following food items:

- Sliced tomatoes
- Cut leafy greens

Sliced tomatoes and cut leafy greens will be washed and prepped each morning and placed in the walk-in cooler. As needed, pans of sliced tomatoes or cut leafy greens will be marked with the time that the pan was removed from the cooler and placed on the prep line. After four hours, any food remaining in the pans will be discarded.

The PIC is responsible for training all food employees in the TPHC procedures and will monitor and verify that foods are discarded appropriately.