

Time as Public Health Control (TPHC)

Time is used in combination with temperature to control bacterial growth or toxin production in potentially hazardous foods and to prevent foodborne illness. The Minnesota Food Code allows food establishments to use **time only** to hold potentially hazardous foods without temperature control for four hours or less. If time is not closely monitored, foodborne illness may result. *Time as Public Health Control* (TPHC) refers to using **time only** to monitor food, instead of time and temperature. This fact sheet provides information about TPHC requirements ([MR 4626.0410](#)).

What types of food can be held using TPHC?

- Before cooking: a working supply of potentially hazardous food. Examples include shell eggs on a cook line, waffle batter at a self-serve breakfast bar.
- For immediate consumption: ready-to-eat potentially hazardous food that is displayed or held for service. Examples include sushi rice, pasta salad, pizza, egg rolls, and rice noodles.

What are the TPHC requirements?

- Submit written notification to the regulatory authority prior to putting TPHC procedures into effect.
- Properly cool food *if* prepared, cooked, and refrigerated before TPHC.
- Mark food container with the time by which food must be cooked, served, or discarded.
- Serve or discard food within four hours once removed from temperature control.
- Once TPHC begins, do not return food to temperature control for use at a later time.
- Discard food in unmarked or improperly marked containers or packages.
- Discard food in marked containers or packages after four hours.
- Maintain written procedures in the food establishment and have the procedures available at the request of the inspector for review.

What do written procedures include?

Effective written procedures communicate *what* the task is, *where* the task will take place, *how* and *when* the task will be performed, and *who* will perform the task.

To ensure compliance with TPHC requirements, written procedures may include the following:

- List *what* specific food will be held using TPHC, *where* each food will be held, and if the food is a working supply or a ready-to-eat food.
- If cooling food that is prepared, cooked, and refrigerated, describe *how* the food will be properly cooled.
- Describe *how* the container will be marked to show *when* food will be cooked, served, or discarded within four hours.
- Identify *who* is responsible for each task.



Frequently Asked Questions

Do my TPHC written procedures need to be approved by the regulatory authority?

No. Approval of written procedures is not required by the Minnesota Food Code. However, food establishments must notify the regulatory authority in writing before using TPHC.

How can I get help in developing my TPHC procedures?

Food establishments are encouraged to work with their inspectors to develop procedures that will comply with TPHC requirements. Contact your inspector regarding notification procedures, tools and resources (i.e., TPHC form or monitoring chart).

Is cooling required prior to using TPHC?

No. Prior refrigeration and/or cooling of the food for which TPHC is used is only required when the food is prepared ahead of time. If a product is prepared and immediately marked with the time within which it will be cooked, served, or discarded, there is no required food temperature prior to using TPHC.

When using TPHC, can food be saved and served later?

No. Once TPHC begins, food cannot be returned to temperature control (e.g., refrigerated, frozen, reheated, or hot-held) to be saved and served later.

If I mix different batches of food in the same container, how do TPHC requirements apply?

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 cook, serve, or discard all the food in the container.

Example:

A container of pasta salad on the salad bar is marked to be used or discarded by 2:00 p.m. At 1:30 p.m., a new container is placed on the salad bar, and the pasta salad remaining in the first container is added to the top. All the pasta salad in the new container must be served or discarded by 2:00 p.m.

For More Information...

Contact the Washington County Department of Public Health and Environment 651-430-6655.

Email:

Phe@co.washington.mn.us

Website:

www.health.state.mn.us/divs/eh/fpls/

Web Resources:

MDH Food Business Safety

www.health.state.mn.us/divs/eh/food/

MDH Food Business Fact Sheets

<http://www.health.state.mn.us/divs/eh/food/fs/index.html>

