



# HEALTH CARE AGENCY/PUBLIC HEALTH ENVIRONMENTAL HEALTH *INFORMATIONAL BULLETIN*

**To:** Orange County Retail Food Facility Owners/Operators

**Subject:** Time as a Public Health Control

Some foods prepared in restaurants and markets have been made and served traditionally at room temperature. Some of these foods, through scientific testing, have been identified as being potentially hazardous foods because either some or all of the ingredients of the foods lend to the rapid growth of harmful bacteria, potentially causing foodborne illness if they are not temperature controlled.

Hot and cold temperature controls serve to keep food safe, as bacteria multiply very slowly or not at all. According to the U.S. Department of Agriculture, when such a potentially hazardous food is removed from temperature control, there is a lag or delay period before the rapid and progressive growth of harmful bacteria begins. During this lag period, potentially hazardous food is safe for preparation, holding, or consumption. After this lag period, bacterial growth is rapid and progressive, **making the food unsafe even if placed back under temperature control.** California food laws now reflect the changes that allow for the holding of potentially hazardous foods at room temperature for up to four hours which is called Time as a Public Health Control (TPHC). The new language was added to the California Retail Food Code (CRFC) in Section 114000 and can be viewed on our website [www.ocfoodinfo.com](http://www.ocfoodinfo.com).

The requirements for food facilities that want to have specific foods handled under the TPHC procedure can be summarized below:

- A written TPHC procedure for each food type must be maintained at the facility at all times. A written procedure must be in place for a food before TPHC may be used for that food.
- Within four hours, foods removed from refrigeration have to be: a) served immediately, b) cooked and served immediately, or c) discarded. The 4-hour period starts as soon as food is removed from temperature control. The 4-hour period is for one time only, in which foods held under TPHC may not be returned to temperature controls regardless of the length of time it was removed from temperature control, even if it were to be cooked afterwards.
- Written procedures must include provisions that any potentially hazardous foods remaining after four hours be discarded. In addition, any food equipment or utensils in contact with potentially hazardous foods held using TPHC be washed, rinsed, and sanitized before re-use.
- Packaged and unpackaged foods need to have signage, stickers, or are otherwise identified to indicate the time that is four hours past the point in time when the food is removed from temperature control. Foods held without signage, stickers, or have exceeded the expiration time shall be discarded.

**A key factor for food facility operators to remember** is that once food has been designated as being held at room temperature using TPHC, *it may not be held longer than four hours and no product taken off of temperature control may be returned for continued refrigeration storage for later use, regardless of the length of time it has been off of temperature control.*

The TPHC procedure holds promise for being a control method that safeguards the community's foods and offers the public the very freshest foods possible, while allowing the retail food facilities to continue to display and serve specific foods in their traditional manner. The following page will assist you in writing your plan, but other formats may be acceptable.

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Rev. 11/02/10

## **Time as a Public Health Control Procedure Template**

*Fill out all fields below for each food product that you would like to place under TPHC. Contact your inspector or their supervisor if you have further questions. Maintain a copy of your TPHC plan at the facility at all times.*

<b>Facility Name:</b>	
<b>PR Number:</b>	
<b>Facility Address:</b>	
<b>Facility City:</b>	
<b>Contact Person:</b>	
<b>Telephone Number:</b>	
<b>Name of Food Product:</b>	
<b>List and number the steps for preparation of this food product:</b>	1.
<b>Describe or attach a sample of the type of signage/stickers that you will use to designate the expiration time/date when this food product is removed from temperature control:</b>	
<b>At the end of the 4 hour time frame, how will this food product be discarded?</b>	
<b>After the food product is discarded, how will you wash, rinse and sanitize items that have been in contact with the food product?</b>	