TIME AS A PUBLIC HEALTH CONTROL

Improper time/temperature control is a leading cause of foodborne illness. The Centers for Disease Control and Prevention (CDC) estimates that 3,000 people die each year in the United States due to foodborne illness and 48 million more become ill. Time/Temperature control is an important factor in preventing foodborne illness.

When time/temperature control for safety (formerly potentially hazardous) foods (TCS foods) are removed from heat or refrigeration and allowed to remain at room temperature, disease-causing organisms (pathogens) multiply more rapidly. In addition to the threat present from the pathogens themselves, some pathogens also produce poisons (toxins) as they grow. These toxins cannot be removed from the food once they are present.

Studies have shown that it takes a while for TCS foods to warm up or cool down. It also takes a period of time for pathogens to be able to multiply at a fast rate. The Food and Drug Administration (FDA) has established guidelines to safely hold TCS foods at room temperature for a short period of time. Holding TCS foods at room temperature (or any less than required temperature) is known as using “time only” (instead of time and temperature) to control the growth of pathogens in the food - or “Time as a Public Health Control”.

TCS foods left in the temperature danger zone closest to human body temperature (98.6°F) are at greatest risk for pathogen growth. For this reason, there are two different time control options – 4 hours or 6 hours. TCS foods that begin cold and remain cooler may be held at room temperature longer.

Main Requirements When Using Time Only As a Public Health Control

- Written procedures explaining your particular operation must be available at all times.
- If foods are cooked, cooled and kept cold before being held using time as a public health control, foods must be properly cooled from 135°F to 70°F within 2 hours and from 135°F to 41°F or less within 6 hours and held at 41°F or below before using time only as public health control.
- Foods must be marked or identified to indicate when time control begins and when the time limit expires (4 hours or 6 hours).
- Foods that are not marked or identified as required must be discarded immediately.
- Foods must be discarded when they have reached the time limit (4 hours or 6 hours).
- Once food has been held using time as a public health control, it cannot go back to being held using temperature control regardless of the temperature of the food.

Specific Requirements Based Upon the Time Option Chosen

4-Hour Option

- Food must begin at 41°F or below; or 135°F or above. (Commercially processed pancake and waffle batter reconstituted with water may begin at any temperature.)
- Fruits and vegetables and hermetically sealed containers that are rendered TCS upon cutting or opening may begin at an initial temperature of 70°F or less if the food does not exceed 70°F within the maximum 4 hour time.
- Commercially processed batter mix, such as pancake and waffle batter, reconstituted with water may begin at any temperature.
- Foods that are required to be maintained at 70°F or less must be discarded immediately if the temperature rises above 70°F.

6-Hour Option

- The food must begin at 41°F or below.
- The food may not rise above 70°F while held using time as a public health control.
- Temperatures of the food must be taken periodically to ensure the food does not rise above 70°F. OR the food must be held in equipment that has an ambient air temperature cold enough to maintain the food at 70°F or below.
- Food that rises above 70°F must be discarded immediately.

Establishments serving a highly susceptible population, such as immunocompromised individuals, young children and the elderly, may not use time as a public health control for raw shell eggs.