

# Time as a Public Health Control (TPHC) Guidelines

California Retail Food Code §113996, 114000, 114002, 114002.1

June 2025

ENVIRONMENTAL HEALTH



**Overview:** Potentially hazardous foods (PHF) require time and temperature controls to prevent the growth of harmful bacteria. However, PHF can be held using time instead of temperature control for up to four hours with written procedures. Foods under time control only must be thrown away after 4 hours. The information below, will explain in detail the requirements of this process known as Time as a Public Health Control (TPHC).

## What is Potentially Hazardous Food (PHF)?

PHF's are foods known to grow bacteria that may cause foodborne illness. To limit bacterial growth, PHF must be held at or below 41°F or at 135°F or above (a process called temperature control). **Examples:** raw and cooked meat, poultry, and fish, raw and cooked eggs, dairy products, cooked rice and pasta, cooked vegetables, raw cut melons, and raw cut tomatoes.

## What is Time as a Public Health Control (TPHC)?

TPHC is an alternative process that uses time instead of temperature to control the growth of bacteria. Written procedures are to be developed, implemented and available for review by the health inspector.

## What types of foods may use TPHC?

- Uncooked PHF (e.g., raw meat or poultry, uncooked eggs) that will be served immediately after cooking (i.e., cannot be hot held or cooled and refrigerated after cooking).
- Ready-to-eat PHF that is displayed or held for service for immediate consumption (e.g., pizza, spring rolls, meat-filled croissants, boba, sushi, cut tomatoes, or cut melons)

TPHC is **not to be used** for **raw eggs at schools or licensed health care facilities**.

## Requirements for using TPHC:

1. **Have Written Procedures**—The operator must always have written procedures on-site and available for review.
2. **Train Food Employees** – All food employees work with products using TPHC shall be trained on the procedures and understand the discard procedure.
3. **Keep Track of Time**— It's important to have a system in place for keeping track of time (e.g., stickers with the time, a timer, time logs). Be sure to mark the "Throw-Away/Expiration" time, which should be 4 hours after the food is removed from temperature control.  
**Example:** If a pizza is removed from the oven at 1:00 p.m., then the Throw-Away/Expiration time is 4 hours later at 5:01 p.m.
4. **Discard Food after 4 Hours**—Food in unmarked containers/packages or marked to exceed 4-hours, must be thrown away.
  - a) Food that is added to an existing batch of food under TPHC, **is required to use the initial** Throw-Away/Expiration time.
  - b) Food containers may not be reused until washed, rinsed, and sanitized.
  - c) Food placed on TPHC may not be returned to temperature control—regardless of the length of time it was removed from temperature control.

**Template - Written Operating Procedures for TPHC**  
**Required to comply with California Retail Food Code: Section 114000**

<b>FACILITY NAME:</b>	<b>FACILITY ADDRESS:</b>
<b>Identify the food, is the food ready to eat or being prepared, how is food marked to identify 4 hours from when removed from temperature control, what occurs after 4 hours.</b>	
<b>Food Item:</b>	<b>Ready to Eat <input type="checkbox"/></b> <b>In Preparation <input type="checkbox"/></b>
<div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Sticker with time</span> <span><input type="checkbox"/> Timer</span> <span><input type="checkbox"/> Time log</span> </div> <div style="margin-top: 10px;"> <input type="checkbox"/> Other(s): _____         </div> <div style="margin-top: 10px;"> <b>Marker indicates:</b>  <input type="checkbox"/> When food must be disposed (Ready to Eat Foods)  <input type="checkbox"/> When food must be cooked (Food in preparation)         </div>	
<b>Food Item:</b>	<b>Ready to Eat <input type="checkbox"/></b> <b>In Preparation <input type="checkbox"/></b>
<div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Sticker with time</span> <span><input type="checkbox"/> Timer</span> <span><input type="checkbox"/> Time log</span> </div> <div style="margin-top: 10px;"> <input type="checkbox"/> Other(s): _____         </div> <div style="margin-top: 10px;"> <b>Marker indicates:</b>  <input type="checkbox"/> When food must be disposed (Ready to Eat Foods)  <input type="checkbox"/> When food must be cooked (Food in preparation)         </div>	
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<i>Note: Food that is prepared, cooked, and refrigerated before time is used as a public health control must ensure compliance with Section 114002 (Cooling). Procedures on proper cooling must be available for those food items in addition to the written procedures for TPHC.</i>	