

Sustainable Food Safety 201



PEAK SHIFT

CHAPTER 9

Service

Holding, protection and the final handoff

FDA model Food Code 2026 | Preface; 3-501.16; 3-501.19; 3-306.11

BASIS: FDA CODE + TEACHING FRAMEWORK



Hold the Food, Not Just the Equipment

Cold TCS food

Maintain 41 F (5 C) or below during ordinary cold holding.

Hot TCS food

Maintain 135 F (57 C) or above during ordinary hot holding.

Measure food

An equipment dial or hot water well does not establish the food's temperature.

Holding maintains a safe condition; it does not replace cooking or reheating.

3-501.16(A); 4-302.12; 2-103.11(I)

BASIS: FDA MODEL FOOD CODE

Holding Exceptions Stay Attached to Their Conditions

Qualifying roast

130 F (54 C) or above only for roasts cooked or reheated by the specified roast provisions.

Raw shell eggs

Untreated eggs: refrigerated ambient air at 45 F (7 C) or below; not a general food limit.

Special dispenser

Homogeneous liquid TCS food needs equipment meeting 4-204.13(E), not an ordinary pump.

Identify the qualifying food and process before using an exception.

3-501.16(A)-(C); 4-204.13(E)

BASIS: FDA MODEL FOOD CODE

Check Early Enough to Act

Code duty

Routine food-temperature monitoring with daily oversight by the person in charge.

House practice

Checks every 2 hours can help detect failures; this is not a universal Code interval.

Failed reading

Stop service of affected food; verify history and apply the applicable disposition procedure.

A failed reading needs evidence, not a guessed start time.

2-103.11(I); 3-501.16; 3-701.11(A)

BASIS: FDA MODEL CODE + RESTAURANT PRACTICE

Time Control Is Planned Before the Pan Leaves

Write in advance

Keep procedures in the establishment and available to the regulatory authority on request.

Define the route

State starting conditions, identification, monitoring where required, and final disposition.

Include prior cooling

Address required cooling when food is prepared, cooked, and refrigerated before time control.

HSP restriction

Do not use time alone for raw eggs in an establishment serving a highly susceptible population.

A broken refrigerator is not a time-control procedure.

The Standard Four-Hour Route

01 Start

Cold food at 41 F (5 C) or below OR hot food at 135 F (57 C) or above.

02 Identify

Mark or otherwise identify the deadline: 4 hours after removal from temperature control.

03 Finish

Cook and serve, serve ready-to-eat food, or discard within the 4-hour limit.

04 Failed mark

Discard unmarked food or food marked beyond the 4-hour limit.

The original removal starts the clock; a new pan does not restart it.

The Six-Hour Route Starts Cold

01 Start cold

41 F (5 C) or below when removed from temperature control.

02 Stay within ceiling

Warmest portion must not exceed 70 F (21 C); monitor unless qualifying ambient control ensures it.

03 Identify both times

Removal time AND the deadline 6 hours later.

04 End the batch

Cook and serve, serve ready-to-eat, or discard by 6 hours; discard earlier above 70 F.

Time remaining never excuses a failed temperature ceiling.

The Narrow 70 F Starting Exception

Qualifying change

Ready-to-eat fruit/vegetable becomes TCS when cut, or hermetically sealed RTE food when opened.

Start and remain

Start at 70 F (21 C) or below and do not exceed 70 F throughout the maximum 4 hours.

Start the clock

Identify the deadline 4 hours after cutting or opening makes the food TCS.

Not a rescue

Previously TCS food that warmed above 41 F does not qualify merely because it is below 70 F.

Newly TCS is the controlling fact, not simply 'under 70 F.'

3-501.19(A),(B)(2)-(5); 3-701.11(A)

BASIS: FDA MODEL FOOD CODE

Keep Hands Off Ready-to-Eat Food

Use a barrier

Tongs, deli tissue, spatulas, single-use gloves, or dispensing equipment protect exposed RTE food.

Change tasks

One task only. Interruptions: scored 2022+2024, discard; 2026, discard if contaminated. Discard damaged/soiled gloves; wash hands when required.

Protect contact areas

Handle cutlery by handles and keep fingers away from food-contact and lip-contact surfaces.

Clean hands and suitable utensils work together.

3-301.11; 2-301.14; 3-304.15(A)-(C); 4-904.11-.12

BASIS: FDA MODEL FOOD CODE

Preset Tableware Must Stay Protected

Protected setup

Wrap, cover, or invert preset tableware to prevent contamination.

Exposed setup

Remove unused settings when guests are seated, or clean and sanitize them before further use.

Separate handling

Keep soiled dishes from contaminating clean settings while clearing the table.

Unused does not necessarily mean still protected.

Park the Utensil Where It Stays Protected

In the food

Keep the handle above both the food and the container.

Closable non-TCS bin

Handle may remain inside the bin if it stays above the food and the container can close.

Clean work surface

Use a clean preparation/cooking surface; clean and sanitize it and the utensil at required intervals.

Protected location

A clean, protected location is allowed for utensils used only with non-TCS food, such as an ice scoop.

A handle is a hand-contact surface, not part of the food.

3-304.12(A)-(C),(E); 4-602.11; 4-702.11

BASIS: FDA MODEL FOOD CODE

Water Storage Has Two Different Routes

Running water

For moist-food utensils, use enough flow to flush food particles into the drain.

Hot water

Maintain at least 135 F (57 C); clean utensil and container at least every 24 hours, sooner for soil.

Warm standing water is neither route, and storage is not sanitizing.

3-304.12(D),(F); 4-602.11(D)(7); 4-702.11

BASIS: FDA MODEL FOOD CODE

Cleaning Clocks Do Not Excuse Contamination

Ordinary TCS contact

Clean equipment food-contact surfaces and utensils at least every 4 hours unless an exception applies.

Contamination

Clean whenever contamination may have occurred, even minutes after the last cleaning.

Non-TCS self-service

Usually at least every 24 hours; qualifying dry cleaning is an exception. Clean sooner after contamination.

Before reuse

Sanitize food-contact surfaces and utensils after cleaning and before use.

The next scheduled cleaning is a deadline, not permission to keep using a dirty tool.

Apply a Cleaning Exception, Not a Blanket Shortcut

Same-food service pan

RTE TCS food and additions stay at required temperatures; clean the container at least every 24 hours.

Refrigerated prep area

Document the room-temperature-based cleaning schedule; cold food alone does not qualify.

Other listed cases

Safely held storage containers cleaned when empty; probes kept in safely held food; an approved cleaning schedule.

House pan swaps

Fresh-pan-only may be restaurant policy; the Code does not ban every same-food replenishment.

No cleaning exception resets food history or permits contamination.

4-602.11(A),(D)(1)-(7); 4-702.11; 3-501.19

BASIS: FDA MODEL CODE + RESTAURANT PRACTICE

Build a Protected Self-Service Line

Food protection

Use packaging, guards, cases, or another effective means to protect displayed food.

Each container

Provide a food-dispensing utensil for each displayed self-service container.

Trained monitoring

Employees trained in safe operating procedures monitor buffets and salad bars.

Condiments

Use protected dispensers, protected displays with utensils, or individual packages/portions.

A food guard does not replace a utensil or an attentive employee.

Ice Used for Cooling Is Not an Ingredient

Exterior coolant

Ice that cooled cans, bottles, food exteriors, or equipment coils cannot later be served as food.

Beverage ice

Keep an uncontaminated supply for drinks and use a protected scoop.

Food on ice

Prevent water entering packages; unpackaged food generally cannot sit in undrained ice.

The ice's job and history matter, even when it looks clear.

3-303.11-.12; 3-304.12(E); 3-501.16

BASIS: FDA MODEL FOOD CODE

Raw Animal Food: Self-Service Is Limited

General rule

Do not offer raw, unpackaged animal food for consumer self-service.

Listed exceptions

RTE sushi/raw shellfish; individual portions cooked and eaten immediately on site; frozen shell-on shrimp/lobster.

Other duties remain

Exceptions do not erase applicable consumer advisories, HSP restrictions, or contamination controls.

The food's intended use and form determine whether an exception fits.

3-306.13(A)-(C); 3-603.11; 3-801.11(C)

BASIS: FDA MODEL FOOD CODE

Make Allergen Information Match the Food

Written notification

Identify major allergens present as ingredients in unpackaged food served or sold to consumers.

House practice: verify

Check recipes and supplier labels when an ingredient or garnish changes.

Protect food

Prevent allergen cross-contact; a menu card alone does not establish safe food.

House practice: pause

Pause the allergen order and verify with the responsible person before making a claim.

Written ingredient information and cross-contact controls solve different problems.

Bulk Food Labels and Allergen Notices Are Different

Bulk self-dispensing

Show the supplied manufacturer/processor label or a prominent card with required information.

Replacement card

Include food name, ingredients, major-allergen sources, and nutrition information where required.

Conditional exemption

Some unpackaged foods qualify only with no claims, no local labeling rule, and qualifying preparation.

Allergen notice

A labeling exemption does not erase written ingredient-allergen notification for unpackaged food.

A handwritten food name may not be the complete required information.

Returned Food Has Only Narrow Re-Service Exceptions

Do not re-serve

Food already in a consumer's possession generally cannot be offered for human consumption again.

Non-TCS exceptions

Sound unopened original packages, or protected dispensing containers closed between uses.

Isolation boundaries

No re-service outside specified isolation; packages from other consumers should not enter protective isolation.

Untouched appearance is not a re-service exception.

3-306.14(A),(B); 3-801.11(G),(H)

BASIS: FDA MODEL FOOD CODE

Contamination Ends Service of the Affected Food

Guest contact

Discard food contaminated by consumers, including hands or oral/nasal discharges.

Dirty utensil

Remove the tool; clean and sanitize before reuse, regardless of its schedule.

Affected food

Discard unsafe food unless an applicable approved reconditioning procedure permits otherwise.

Removing the visible contaminant does not establish that the food is safe.

3-701.11(A),(C),(D); 4-602.11(A)(5); 4-702.11

BASIS: FDA MODEL FOOD CODE

Fresh Plates and Controlled Drink Refills

Second portions

Use clean tableware; do not allow used buffet plates back to the food display.

Employee refill

Keep the pouring utensil away from the drinking container's lip-contact area.

Self-service beverage

Use a contamination-free system: protect outlets, divert splash, and prevent rim contact.

A beverage-refill exception is not permission to refill a used dinner plate.

3-304.16(A)-(C); 2-103.11(M); 4-204.13(A),(B),(D)

BASIS: FDA MODEL FOOD CODE

Reusable Containers: Check the Conditions

Suitable multiuse design

Container materials, construction, and cleanability must meet the cited equipment requirements.

Clean and sanitize

Complete the required cleaning and sanitizing before refill.

Employee inspection

A food employee visually checks that the returned container meets requirements before use.

Not single-use

A washed disposable takeout tub does not become an approved multiuse container.

Ownership alone does not decide whether a returned container can be refilled.

Refill Without Contaminating the Station

Transfer

Refill through a contamination-free process and keep the returned container off food-contact surfaces.

Station surfaces

A food employee cleans and sanitizes the food-contact surfaces used for refilling.

Plant returnables

Containers returned for cleaning/refilling in a regulated plant are not refilled at the restaurant.

Water exception

Non-food-specific consumer containers may be filled at a water vending machine or system.

A qualifying container still needs a qualifying transfer process.

3-304.17(B)-(D), Dec 2024; Parts 4-6/4-7

BASIS: DECEMBER 2024 AMENDMENT + RESTAURANT PRACTICE

Delivery Carries the Same Food Controls

Temperature

Maintain ordinary cold TCS food at 41 F or below and hot TCS food at 135 F or above.

Protection

Use protected food-safe containers and prevent raw food from contaminating ready-to-eat food.

History

Keep any TPHC identification and original deadline with the batch; the drive uses the same clock.

House verification

Check food at dispatch and arrival; select carriers that support the actual route.

A short trip and an insulated bag are not proof of safe holding.

Make the Catering Site Capable of Safe Service

Before the event

Confirm local authorization, approved drinking water, handwashing, and cleaning/sanitizing arrangements.

During service

Provide holding capacity, protected food displays, clean utensils, and trained monitoring.

At handoff

As house practice, give clear handling instructions and communicate any remaining TPHC time.

A tent and a table do not replace food-safety facilities.

5-101.11; 5-203.11; 5-204.11; 8-301.11; 3-501.16

BASIS: FDA MODEL CODE + LOCAL REQUIREMENTS + PRACTICE

Vending Must Stop When Temperature Control Fails

Automatic stop

TCS vending machines must prevent sales when a failure prevents required food-temperature control.

Restart conditions

Service the machine and restock with food maintained at required temperatures before vending resumes.

Recovery limits

After fill/service/restock: cold air above 41 F no more than 30 min; hot air below 135 F no more than 120 min.

Package and history

Vend TCS food in its preparing establishment/plant package; maintain applicable date and discard controls.

Air-recovery allowances are not general food-temperature allowances.

Service: Keep the Control Through the Handoff

Name the process

Ordinary holding or a fully specified time-control route; never an improvised clock.

Protect contact

Clean hands, utensils, tableware, displays, and compliant refill processes.

Act on failure

Stop affected service, preserve the facts, and apply the required correction or disposal.

Safe service depends on conditions you can demonstrate.