

CHAPTER 9 | STUDY GUIDE

Holding: Verify the Food and Its History

Service begins with food that has completed the preparation process appropriate to its use. Holding maintains that condition. The 2026 FDA Food Code is a model; locally adopted requirements govern. A certification exam transition to this Code edition is unconfirmed; check the provider's current exam guidance. Use the limits below for ordinary holding and qualify each exception before applying it.

Recognize	Understand and apply
Ordinary holding	Cold TCS food stays at 41 F (5 C) or below; hot TCS food stays at 135 F (57 C) or above. A thermometer reading from the food is evidence; steam, a water-well reading, or a cabinet setting is not a substitute.
Qualifying roast	130 F (54 C) holding applies only to roasts cooked under 3-401.11(B) or reheated under 3-403.11(E). It does not extend to every meat dish.
Eggs and liquid dispensers	Untreated shell eggs require refrigerated ambient air at 45 F (7 C) or below. Homogeneous liquid TCS food needs the special dispenser that maintains commercial sterility of aseptically packaged food for a specified duration after opening within the equipment and meets NSF/ANSI 18-2006.
Monitoring	The person in charge provides daily oversight of routine food-temperature monitoring. A two-hour check schedule is restaurant practice, not a universal interval in the holding rule.
Failed control	Stop affected service and establish the last reliable temperature, elapsed time, and applicable process. Unsafe food is discarded or reconditioned through an approved procedure where allowed. Unknown history is not an automatic reheating allowance.

The Steaming Well

A well is steaming while the soup measures 121 F. Check the actual history and involve the person in charge. Raising the equipment setting may correct the equipment, but does not by itself establish that the soup can still be served.

Remember: Measure food, qualify exceptions, and keep truthful records. A house checking interval does not create a grace period for unsafe holding.

Memory cues and recall practice: pages 9-10.

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Time as a Public Health Control: Choose the Whole Route

TPHC replaces normal temperature holding only within a planned, limited process. Prepare written procedures in advance, keep them in the establishment, and make them available to the regulatory authority on request. Include required cooling methods when food is prepared, cooked, and refrigerated before TPHC. The model section does not require universal advance approval for its standard routes; local rules may add requirements.

Recognize	Understand and apply
Standard four hours	Start at 41 F (5 C) or below from cold holding, or 135 F (57 C) or above from hot holding. Identify the deadline four hours after removal. Cook and serve, serve ready-to-eat, or discard within that period. This standard route has no 70 F ceiling.
Six hours, cold only	Start at 41 F or below. Keep the warmest portion at or below 70 F (21 C). Monitor unless maintained ambient conditions ensure that ceiling. Identify both removal and six-hour deadline. Discard immediately if food exceeds 70 F; otherwise cook and serve, serve ready-to-eat, or discard by six hours.
Newly-TCS four hours	Ready-to-eat fruit/vegetables made TCS by cutting, or ready-to-eat hermetically sealed food made TCS by opening, may start at 70 F or below. Food must not exceed 70 F throughout the maximum four hours. Identify the deadline from the cutting/opening event. Previously TCS food that warmed does not qualify.
No new clock	A pan change, added fresh food, arrival at an event, or return to refrigeration cannot extend the original deadline. Required identification must be present. Unmarked food or food marked beyond its route's maximum is discarded.
Special population	An establishment serving a highly susceptible population may not use time alone for raw eggs. Other TPHC foods still require all applicable route conditions.

Cutting Is the Starting Event

A melon cut at 10:25 at 67 F can use the newly-TCS route under the written procedure: keep it at or below 70 F and identify 2:25 as the deadline. A cold chicken salad that warmed to 67 F cannot enter that exception, because cutting or opening did not just make it TCS.

Remember: Do not mix the four-hour starting temperatures, six-hour ceiling, and newly-TCS exception into a fourth, invented route.

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Hands, Handles, and Between-Use Storage

Service utensils protect food only while their food-contact surfaces remain safe. Exposed ready-to-eat food at the final handoff normally needs tongs, deli tissue, a spatula, single-use gloves, or dispensing equipment. Handwashing is still required. A supervisor's permission is not the regulatory approval required for a qualifying bare-hand alternative.

Recognize	Understand and apply
Task changes	Ordinary single-use glove rule: one task; discard if damaged, soiled or contaminated during an interruption. After soiled dishes, perform required handwashing before clean service. Keep fingers off food-contact and lip-contact areas of clean tableware; present unwrapped cutlery so only handles are touched.
In-food resting	Keep the handle above both the food and the container. In a closable non-TCS bin, such as sugar, the handle can remain inside the bin if it stays above the food. Do not bury it.
Clean surface or holder	A clean food-preparation/cooking surface is allowed if both it and the utensil receive required cleaning and sanitizing. A clean protected location is allowed for utensils used only with non-TCS food, such as an ice scoop.
Running water	For utensils used with moist food, such as ice cream, running water must flush food particles into the drain. A stagnant bucket or ineffective trickle does not meet this condition.
Hot-water storage	Maintain water at least 135 F (57 C). Under the associated cleaning exception, clean both utensil and container at least every 24 hours and sooner to prevent soil accumulation. This storage temperature is not a hot-water sanitizing specification.
Preset tableware	Wrap, cover, or invert to protect it. If preset settings are exposed, remove unused settings when consumers are seated, or clean and sanitize those left in place before further use. Keep soiled tableware from contaminating clean settings.

Set Up Before the Rush

A short ladle keeps slipping below the gravy's rim. Replace it with a suitable longer utensil or use another compliant storage method. Remove a potentially contaminated ladle for cleaning and sanitizing; rearranging it does not remove contamination.

Remember: Select one complete storage method. None permits continued use of a utensil after possible contamination.

Scored 2022 + December 2024: one task; discard damaged/soiled gloves or when interruptions occur. 2026 adds the interruption-contamination qualifier and a conditional, regulatory-authority-approved inner-glove route (Chapter 4, p. 16).

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Cleaning Frequency: Match the Use and the Exception

Ordinarily, clean TCS-contact items at least every four hours, sooner whenever contamination may have occurred. After cleaning, sanitize utensils and equipment food-contact surfaces before use. TPHC deadlines, utensil cleaning, and temperature checks are separate controls.

Recognize	Understand and apply
Service-container exception	Containers holding ready-to-eat TCS food on a service line may receive more of the same food when both supplies remain at required temperatures and the container is cleaned at least every 24 hours. This does not give every serving utensil the same interval or extend a TPHC clock.
Refrigerated preparation	For utensils/equipment used to prepare food in a refrigerated room or area, document the ambient-temperature schedule: 41 F or below, 24 hours; above 41 through 45 F, 20 hours; above 45 through 50 F, 16 hours; above 50 through 55 F, 10 hours. Cold food on a warm line is not this exception.
Other conditional cases	Listed cases include safely held storage containers cleaned when empty, probes maintained in safely held food, storage equipment cleaned to prevent soil accumulation, an approved equipment schedule, and qualifying 135 F hot-water utensil storage. Verify the applicable conditions rather than assuming every cold tool qualifies.
Non-TCS service	Clean consumer self-service utensils and iced-tea dispensers at least every 24 hours, and self-service dispensers/display containers before restocking, except for qualifying dry cleaning under 4-603.11. That exception requires dry non-TCS residues and dedicated cleaning tools. Possible contamination still requires cleaning.
House policy	Fresh-pan-only replenishment is a stricter house practice, not a Code ban on adding safely held same food.

A Container Is Not Its Spoon

The cafeteria's same-food service-container exception does not set its spoon's cleaning interval. Determine the spoon's rule; remove it immediately after contamination.

Remember: Apply each exception only to its stated items and conditions. Contamination requires cleaning and sanitizing.

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Self-Service Protection and Information

Guests handle part of self-service, but the operation still protects the food and provides trained employee monitoring. Accurate allergen information and prevention of allergen cross-contact are separate duties.

Recognize	Understand and apply
Protected display	Use packaging, guards, display cases, or another effective method. Only nuts in shells and whole raw produce to be hulled, peeled, or washed by consumers before eating qualify for the exception. Never serve ice used as an exterior coolant. Prevent water entering packages. Unpackaged food generally cannot sit in undrained ice; listed exceptions include whole raw produce, cut raw vegetables, and tofu.
One utensil each	Every container at consumer self-service needs a food-dispensing utensil, even duplicate recipes. Color coding is optional restaurant practice.
Raw animal food	Raw unpackaged animal food is generally prohibited. Listed exceptions include ready-to-eat sushi/raw shellfish, individual portions for immediate on-site cooking and consumption, and raw frozen shell-on shrimp/lobster. Applicable advisories and highly susceptible population restrictions remain.
Condiments and monitoring	Use protected dispensers/displays with proper utensils or individual packages/portions. Trained employees monitor and correct contamination, including guest-hand contact and transferred utensils.
Allergen information	Provide written notification of major allergens present as ingredients in unpackaged food. Staff need duty-appropriate allergy awareness. House practices include recipe-change checks and allergy-order handoffs.
Bulk-food information	For consumer self-dispensing, show the supplied manufacturer/processor label or a prominent card with required name, ingredients, allergen sources, and nutrition information where required. A conditional exemption requires no claims, no local labeling mandate, and on-premises or qualifying same-owner regulated preparation. Written ingredient-allergen notification still applies.

The Changed Dressing

A replacement dressing adds sesame. Update written ingredient-allergen information. If its spoon entered another dish, also address cross-contact; updating a label cannot undo the transfer.

Remember: Protect the display, equip each container, monitor service, and keep food information accurate.

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Returned Food and Used Tableware

Once food has been served or sold and entered the consumer's possession, it generally cannot be offered for human consumption again. 'Untouched' is not a reliable category in that rule. Keep the decision about returned food separate from the rules for second portions, beverage refills, and refillable multiuse containers.

Recognize	Understand and apply
Narrow non-TCS exceptions	A sound unopened original package may qualify for re-service. So may a non-TCS food dispensed from a contamination-protective container kept closed between uses, such as a suitable narrow-neck sauce bottle. An unwrapped roll or plate garnish does not qualify.
Isolation	Food served to patients/clients under contact precautions in medical isolation or quarantine, or protective environment isolation, cannot be re-served to others outside. Packages from other consumers should not be re-served to someone in protective environment isolation.
Contamination	Discard food contaminated by people through hands, bodily discharges, or other means. Remove contaminated utensils and clean and sanitize before reuse. Other unsafe food follows discard or applicable approved-reconditioning rules; do not invent a reheating rescue.
Second portions	Use clean tableware. Employees cannot use consumer-soiled plates for refills, and consumers cannot return with used plates to obtain additional buffet food. Notify guests that clean tableware is required.
Beverage refill	Employees may refill drinking containers without pouring-utensil contact with the lip-contact area. Self-service refills must use a contamination-free dispensing system with protected outlets, diverted splash/drips, and no rim contact with the actuator/filling device.

Do Not Salvage the Basket

An unwrapped biscuit returns from a guest's table. A clean basket and a trip through the oven do not qualify it for re-service. By contrast, a sound unopened original packet of non-TCS crackers may fit the narrow exception outside the isolation restrictions.

Remember: Ask what entered the consumer's possession, what remains protected, and which specific exception actually applies.

Refillable Containers in the 2026 Model Code Conditions introduced in 2024

The 2026 Code retains 3-304.17 conditions introduced in the December 2024 Supplement for consumer-owned, establishment-owned, or third-party reusable containers. Do not impose the old 'originally supplied by this restaurant' test as a universal requirement under the amended model provision. Verify whether the amendment has been adopted locally before using it operationally.

Recognize	Understand and apply
Construction	The container must be designed and constructed for multiuse under the cited materials, durability, and cleanability provisions. A disposable takeout article does not become multiuse merely because it survived washing. Single-service and single-use articles are not reused.
Before refill	Complete the required cleaning and sanitizing. A food employee visually inspects the returned container to verify it meets requirements before use. Looking clean is not a substitute for the required process.
Who may refill	Either a food employee or consumer may refill under the amended conditions. Consumer participation does not remove employee inspection or allow an uncontrolled self-service transfer.
Transfer and surfaces	Use a contamination-free transfer and prevent direct contact between the returned container and food-contact surfaces. A food employee cleans and sanitizes the refill station's food-contact surfaces. A separate receiving tray, utensils, or secondary container can help implement this, but the effective process matters.
Special boundaries	Containers returned for cleaning/refilling in a regulated food processing plant are not refilled at the food establishment. Consumer containers that are not food-specific may be filled at a water vending machine or system; do not extend this exception to ordinary food refilling.

A Bowl From Home

A customer's durable reusable bowl is not automatically rejected because it came from another store. Verify suitability, the cleaning/sanitizing process, employee inspection, and the transfer setup. Keep it outside off the clean preparation board. Any failed condition prevents treating the bowl as a compliant refill.

Remember: Suitability, cleaning and sanitizing, inspection, and contamination-free transfer are cumulative requirements. Ownership alone decides none of them.

Off-Site Service and Vending

Moving food away from the kitchen does not remove its temperature or contamination controls. Treat transport, setup, service, and handoff as one continuous history. Match the equipment and facilities to the actual trip or event, and verify local authorization instead of assuming a restaurant permit covers every off-site operation.

Recognize	Understand and apply
Delivery	Keep ordinary cold TCS food at 41 F (5 C) or below and hot TCS food at 135 F (57 C) or above, unless a valid alternative applies. Use protected food-safe containment and prevent raw animal food from contaminating ready-to-eat food. Dispatch/arrival checks and delivery logs are restaurant methods, not universal formats.
Catering site	Confirm approved drinking water, convenient required handwashing, cleaning/sanitizing arrangements, holding capacity, and protected service. A tent is not a substitute for facilities. Local authorities determine permits and any permitted alternatives.
Handoff	Keep original TPHC identification and deadlines with the food. Travel and setup count toward the same limit. Clear written customer handling instructions are good service practice unless a particular applicable rule or plan makes them mandatory.
Automatic vending control	A TCS vending machine must prevent vending when a failure prevents required food-temperature control. Sales cannot resume until the machine is serviced and restocked with food maintained at required temperatures. Restoring power or adding a warning sign is insufficient.
Recovery and packages	Under the activated automatic-shutoff control, immediately after filling, servicing, or restocking, cold-machine air above 41 F is limited to 30 minutes; hot-machine air below 135 F is limited to 120 minutes. These air-recovery conditions are not general food allowances. Vend TCS food in its preparing establishment/plant package and maintain applicable date/discard controls.

The Delayed Reception

A four-hour batch leaves control at 11:20, then spends 40 minutes in transit and 25 in setup. Its deadline is still 3:20. A late guest arrival does not permit relabeling; adjust quantities or service arrangements while preserving the original control.

Remember: Maintain controls through the handoff. Do not let distance, a new operator, or a machine restart erase food history.

CHAPTER 09 | REMEMBER THE DIFFERENCE

Four Hours and Six Hours Are Routes

A time-control deadline is planned before food leaves control.

Time as a public health control (TPHC) requires advance written procedures kept in the operation and available to the authority. This is not permission to start a timer after finding warm food.

Standard FOUR	Start cold food at 41 F or below, or hot food at 135 F or above. Identify the four-hour deadline. Cook and serve, serve RTE food, or discard within it. This standard route does not impose the six-hour route's 70 F ceiling.
Cold SIX	Start at 41 F or below; warmest food stays at or below 70 F. Identify removal time and six-hour deadline. Monitor unless ambient conditions ensure the ceiling. Discard if above 70 F; otherwise finish cooking and service, serve RTE food, or discard by six hours.
Newly-TCS FOUR	Qualifying RTE produce made TCS by cutting, or hermetically sealed RTE food made TCS by opening, may start at 70 F or below and must stay at or below 70 F. Identify four hours from that event. Previously TCS food that warmed does not qualify.
No new clock	Transfer, travel, fresh additions or return to the cooler cannot extend a deadline. Missing required identification means discard. HSP operations may not use time alone for raw eggs.

Use it on shift: A cold six-hour batch starts at 40 F at noon. At 3 p.m. the warmest food is 72 F. Discard now; the ceiling failed. Do not switch to a different route to get more time.

Cover the answers. Explain the reason.

Four-hour route begins at 11:20 a.m. Deadline? 3:20 p.m. Travel and setup are part of that same clock.

Cooking completed just before the deadline is enough? No. When cooking is needed, the requirement is cook AND serve within the deadline.

Review: earlier guide pp. 1-2, 8. **Sources:** 3-501.19(A)-(D). Local adoption may add requirements. Routes are alternatives with complete conditions, not mix-and-match numbers.

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CHAPTER 09 | REMEMBER THE DIFFERENCE

Holding, Utensils and Returned Food

One good control does not cancel the next one.

Separate the food's temperature, the serving tool's condition, and what happened after the guest received it. Similar-looking exceptions apply to different items.

135 ordinary; 130 qualifying roast	Ordinary hot TCS holding is 135 F or above. The 130 F exception is for roasts cooked under the prescribed whole-roast process or reheated under the corresponding unsliced-roast route. It is not a lower limit for every beef dish.
135 water is storage, not sanitizing	Between-use utensil water maintained at least 135 F has its own storage/cleaning conditions. Manual hot-water sanitizing uses at least 171 F for 30 seconds after cleaning.
FOUR-hour tools; immediate if contaminated	Ordinary TCS-contact equipment/utensils need cleaning at least every 4 hours during use and sooner after relevant task changes or contamination. Sanitize before reuse. Conditional exceptions are not a general longer interval for every spoon.
Returned does not mean reusable	Food that entered a consumer's possession generally cannot be re-served. A sound unopened original non-TCS package may qualify for an exception; an unwrapped roll does not. Isolation/protective-environment restrictions can be stricter.

Use it on shift: A qualifying roast is held at 132 F under its exception. The soup beside it still needs ordinary hot holding at 135 F or above. Proximity to the roast does not extend the exception.

Cover the answers. Explain the reason.

A clean spoon fixes food already contaminated by a guest? No. Correct both the tool and the affected food; do not just reset the display.

A guest's untouched bread basket can return to service? No. "Untouched" does not establish an exception for unwrapped bread.

Review: earlier guide pp. 1, 3-6. **Sources:** 3-501.16; 3-304.12; 3-306.14; 3-701.11; 3-801.11(G)-(H); 4-501.111; 4-602.11; 4-703.11.
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