

Cold Holding Policy

Perhaps you have been running restaurants for twenty years. Or maybe you just graduated from a prestigious culinary school. You know what you're doing. So why did you still get a cold holding violation?

Maybe it's time to create a cold holding policy, so you can ensure that your employees know what to check, when to check it, and what to do if something isn't right.

First of all, what is a policy and how do you create a cold holding policy for your food establishment?

A policy is a defined set of actions that minimize food safety risks. Although some small food establishments may have verbal policies, it is best to write your policies down.

Here are the key steps to consider when developing any policy:

- **Include the key people at the table**
- **Identify the most important steps in your processes**
- **Ensure that your policy includes corrective actions**
- **Revise the policy based on problems that arise, or as your food processes change**

Let's look at each of these steps more closely.

When writing your policy, make sure you are including the key people in your establishment, and also consider which staff members may be involved in each step. Who is your Certified Food Manager? Who conducts cold holding line checks? Do you have multiple shift leads who oversee your establishment throughout the day? If your establishment is part of a national chain that has uniform standards, you may want to include a regional manager or Quality Assurance personnel in writing your cold holding policy.



Now let's take a closer look at the second point. Where in your establishment could a cold holding issue arise?

Receiving

Is TCS (time/temperature control for safety) food delivered directly to refrigeration units? How long is it allowed to sit on your dock? Are you taking temperatures of food when delivered?

Storage

Make a list of every piece of equipment that is used for the cold storage of TCS food.

Preparation

Review various menu items that are prepared in your establishment. Consider how cold holding temperatures are maintained during preparation, such as preparing small amounts frequently, or holding TCS food on ice during preparation.

Cold Holding

Recall that TCS food must be held at 41°F or below. You may want to review what food in your establishment are categorized as TCS. Also include how you ensure the proper cold holding temperature in your refrigeration units, such as taking food temperatures or checking unit thermometers. Consider employee behaviors to avoid, such as filling TCS containers above the fill line in make-tables and stuffing reach-in coolers so that air flow is blocked. Make sure that TCS food stays 41°F or below even when your refrigeration units go through defrost. Your pre-set defrost times may need to be adjusted seasonally so that this can happen.

Cooling

Consider when and where hot food is cooled, and how this may impact cold holding units. If cooling takes place in your refrigeration units, include steps in your policy to ensure that the hot food does not warm up refrigeration units, such as packing hot food on ice within the refrigerator or beginning the cooling process on ice outside of the refrigerator.

Assembly

When menu items containing TCS food are assembled, look at how long the food is outside of refrigeration. Consider assembling small amounts more frequently, or packing on ice to maintain cold holding temperatures.



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Ask these questions for each of these operations:

Who is responsible?

Who is working with cold TCS food? Who oversees the process?

What needs to happen?

TCS food must maintain a temperature of 41°F or below.

When does it take place?

Consider pre-opening activities, switching over between lunch and dinner, during busy times, and closing activities.

Where does it occur?

Include all cold holding units, refrigeration units and ice bath areas that hold TCS food.

How is this achieved?

This is where you can incorporate logs and documentation. Sample logs are provided as part of our toolbox. You may want to include steps about how thermometers are used and how staff will document temperatures.

As you review these key operational steps, consider whether it would make sense in your business model to write several policies for cold holding. For example, you might write one policy for checking that equipment is working properly, and another to address staff behavior (e.g. overstocking food in make-tables).

Now for the corrective actions. This is the “what if...” step. What if something goes wrong? Your policy should state what actions are taken if cold holding temperatures are not in place. You can include a space for writing in corrective actions on your logs.

But don't stop here! Your cold holding policy is a living document, and will change over time. When you discover areas of non-compliance in your establishment, use them as opportunities to improve, and return to your policy to incorporate the changes. In this way, you will continue to improve.





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To summarize, here are the key steps to consider with any policy:

- **Include the key people at the table**
- **Identify the most important steps in your processes**
- **Check that your policy answers the questions: who, what, when, where, why and how**
- **Ensure that your policy includes corrective actions**
- **Revise the policy based on problems that arise, or as your food processes change**

Remember, if you don't train your employees on your cold holding policy, it won't do much to help your establishment. Check out the next document, a Manager's Guide to training your employees.

