

Hot 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 hot holding violation?

Maybe it's time to create a hot 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 hot 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 hot 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 hot holding policy.

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

Storage

Do you store any time/temperature control for safety (TCS) food hot overnight? Make a list of every piece of equipment that may be used for the hot storage, include during special events or for caterings or special events.

Preparation

Review various menu items that are prepared in your establishment. Consider whether hot holding temperatures are maintained during preparation, or whether you would rather add a cooling step for TCS food prior to prep.

Cooking

Consider the various food that is cooked in your establishment, including raw animal proteins and vegetables. What steps are taken after the food is cooked? Remember that although most animal food is always categorized as TCS, vegetable food because TCS after being cooked. Do you maintain hot temperatures for vegetables, or should you add a cooling step? Review and modify your processes to minimize food safety risk before you write your hot holding policy.

Hot Holding

Recall that TCS food must be held at 135°F or higher. You may want to review what food in your establishment is categorized as TCS. Also include how you ensure the proper hot holding temperature in your steam wells and hot holding wells. You may want to include logs for taking hot holding food temperatures. Consider employee behaviors to encourage, such as frequent stirring of thick soups and checking that water hasn't evaporated from wells. Also think about employee behaviors to discourage, such as filling soup containers well above the fill line or having employees keep hot TCS in pans without a heat source for extended periods of time.

Assembly

When menu items containing TCS food is assembled, look at how long the food is without a heat source. Consider cooling TCS food prior to assembly, or adding a cooling step after assembly.

Ask these questions for each of these operations:

Who is responsible?

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

What needs to happen?

TCS food must maintain a temperature of 135°F or higher. With hot holding, it is especially important to check for variations in temperature throughout a food product, and the capability of hot holding equipment to consistently maintain product at or above 135°F.

When does it take place?

Consider pre-opening activities, especially reheating steps that impact hot holding, switching over between lunch and dinner, during busy times, and closing activities.

Where does it occur?

Include all hot holding units that hold TCS food. Also include food that is held in pans on the grill, hot boxes, ovens, steam wells, rice cookers and crock pots.

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 hot holding. For example, you might write one policy for checking that equipment is working properly, and another to address staff behavior (e.g. frequent stirring of thick food, or checking for water levels in steam 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 hot 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 hot 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.



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 hot holding policy, it won't do much to help your establishment. Check out the next document, a Manager's Guide to training your employees.