

MOBILE FOOD UNIT BASIC REQUIREMENTS

LAWS AND REGULATIONS

- Iowa follows the [2017 FDA Food Code](#) (with the 2019 Supplement). It complies with [Iowa Code 137F](#) and Iowa Administrative Codes [Chapter 30](#) and [Chapter 31](#). These regulations govern food establishments.
- Refer to Chapter 4 of the FDA Food Code for equipment requirements. For plumbing and water needs, see Chapter 5. Chapter 6 provides details on physical facilities. Refer to the table of contents to find the section on operations and procedures.
- All licensed facilities must follow State and Local Fire, Plumbing and Building Codes, including mechanical ventilation. If you have any questions, please contact your local agencies.
- A pre-operational inspection and approval is required before opening for business.
- Mobile Food Units need to meet the definitions and requirements for [mobile food operations](#).

LICENSING

- An application for a license must be submitted 30 days before opening the food establishment. [Apply for your license here](#).
- A license application for the intended operation must be on file with the Department prior to a plan review.
- A Food Establishment needs an inspection and approval to open.
 - After the application is processed, an inspector will be assigned. Then, a pre-operational inspection may be done to approve the license. Operating without an approved license will result in a penalty fee. This fee will be the same as the original license fee. It could also lead to closure of your operation. Penalty fees must be paid before a license can be issued. Once issued, a license is valid for one year from the date of approval.
- **The following items should be submitted with the License Application:**
 1. The completed [Mobile Unit Plan Review and Menu Form](#).
 2. [Certified Food Protection Manager Certificate of Completion](#). (when applicable)
 3. Standard operating procedures, including:
 1. [Employee Health Policy](#) (Refer to the linked document or create a similar one. Ensure it includes all the necessary information; reference the [U.S. Food & Drug Employee Health and Personal Hygiene Handbook](#).)
 2. Clean up Procedures ([specific to your facility](#)) for vomit or diarrhea incidents. ([Info to help create your procedure](#))
 3. HACCP Plans for [Specialized Food Processes](#). (when applicable)
 4. Photos of the exterior and interior of the mobile unit which includes the VIN and the license plate.

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FACILITY AND EQUIPMENT (The 2017 FDA Food Code contains a complete list.)

Demonstration of Knowledge: FDA Food Code: 2-101.11, 2-102.11, and 2-103.11

- The permit holder must have a person in charge (PIC) present at the food establishment when it is open. The PIC must show that they understand food safety and how to prevent foodborne diseases. They should know HACCP principles and the FDA Food Code requirements.
- The PIC must demonstrate this knowledge by the following:
 - Compliance with the Code by having no priority violations during the current inspection.
 - Being a certified food protection manager.
 - Provide the correct answers to the inspector's questions about the food operation.

Certified Food Protection Manager: FDA Food Code: 2-102.12 and IAC Ch. 31.1(2)

- The facility must have at least one employee with supervisory duties. This person must be a certified food protection manager.

Employee Health: FDA Food Code: 2-201.11, 2-103.11

- Employees must report illness symptoms or diagnosed illnesses to the PIC.
- The PIC must report certain illness symptoms or diagnoses to the regulatory authority.
- A verifiable employee health procedure is required.

Clean-up of Vomiting and Diarrheal Events: FDA Food Code: 2-501.11

- A food establishment needs written procedures for staff for dealing with vomiting or diarrhea. These procedures should be specific to their facility.

HACCP Plans: FDA Food Code: 8-201.13, 8-2.1014, and 3-502.11

- When the establishment uses [special processes](#), to prepare food, it must have a HACCP plan and an approved variance.

Food Source and Temperatures: 3-101.11, 3-201.11-16, 3-202.11, 3-202.16, 3-501.16, 3-501.18

- All food items need to come from a licensed grocery store, food manufacturer, food supply company, or other approved source. Home-produced foods only qualify if made in a licensed home food processing establishment.
- Ice used for food must be made from drinking water
- Refrigerated ingredients or prepared foods should be received and stored at 41°F or lower, or 135°F or higher.
- Hot or cold foods prepared by the facility must have a preparation date. They must be sold or discarded within seven days.
- Cottage Foods cannot be stored or sold in mobile units.

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Handwashing Facilities: FDA Food Code: 5-202.12(A), 5-203.11, and 5-204.11

- Handwashing sinks should have hot water of at least 100°F and be easy for all employees to access. Position hand sinks in all areas where food is prepared and served. They also need to be in dishwashing areas, and restrooms.

Warewashing: FDA Food Code: 4-301.12, 4-301.13, 4-501.116

- Clean and sanitize all dishes. Sink compartments should be big enough to fit the largest item being cleaned.
- Drainboards, shelves, or tables should be available for clean sanitized dishes to air dry. Have areas available to hold dirty dishes until they can be cleaned and sanitized.
- Use a test kit and thermometer to verify sanitizer concentrations and water temperatures.

Water & Sewage: FDA Food Code: 5-101.11, 5-103.11, 5-202.11, 5-202.13, 5-203.13, 5-203.14, 5-203.15, 5-402.11

- Drinking water must come from an approved source. This can be a public water system, or a non-public water system. The non-public system must follow legal guidelines. Builders, maintenance teams, and operators must build, maintain, and operate it according to the law. Annual well testing must be on file.
- The hot and cold-water sources must be able to meet the peak water needs of the food establishments.
- Plumbing systems, fixtures, and beverage dispenser carbonators, need proper backflow prevention.
- Ensure that drains on equipment for liquid waste are safe from backflow.
- Remove sewage and other liquid from the unit safely. This should be done in an approved way that does not post a public health risk.

Water Tanks: The FDA Food Code Chapter 5, section 3 outlines the full requirements for water tanks and hoses.

- Wastewater tanks must be 15% larger than freshwater tanks. Water tanks should be sloped to drain and be smooth, durable, and easy to clean.
- Water hoses should be smooth, durable, and easy to clean. They must be intended for drinking water use. If water hoses are not permanently attached, label them for their specific use.

Restrooms: FDA Food Code: 5-203.12

- Keep a written restroom agreement for restroom use with the neighboring business must be maintained in the mobile unit. Not required when operating at an event or farmers market.

Equipment: FDA Food Code: 4-201.11, 4-204.16, 4-204.112, 4-301.11, 4-302.12

- Equipment and utensils must be durable and retain their key qualities when used as intended.

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- Cover ice bins to prevent contamination.
- Beverage tubing and cold-plate cooling devices may not touch stored ice.
- Provide thermometers in all refrigerated units, placed in a visible location towards the front.
- Facilities need enough equipment to hold hot and cold food. Equipment should quickly cool or reheat food.
- Use a thermometer to monitor food temperatures. Thermometers must have a tip-sensitive probe for testing thin foods (such as meat patties).

Surface Characteristics & Outer Openings: FDA Food Code: 5-501.11, 6-101.11, 6-201.13, 6-201.16, 6-202.15

- Exterior surfaces of mobile food units must be weather-resistant.
- Interior floors, walls, and ceilings must be smooth, durable, nonabsorbent, and easy to clean.
- Keep the inside of the mobile unit free of pests.
- Protect outer openings from insects and rodents by:
 - Filling or closing holes and gaps.
 - Using closed, tight-fitting windows.
 - Installing solid, self-closing, tight-fitting doors.
 - By other effective means.

Lighting and Ventilation: FDA Food Code: 6-202.11, 6-304.11

- Shatter-resistant or covered light bulbs are needed inside the mobile unit.
- When necessary, mechanical ventilation must control excessive heat, steam, or humidity. Odors, vapors, smoke, and fumes must be controlled.
- Specific towns may require local fire department inspections to operate.

Storage: FDA Food Code: 3-305.11, 4-903.11

- Store equipment, prepared food, and ingredients in the following ways:
 - Food must be covered.
 - In a clean, dry location at least 6 inches off the floor.
 - Away from splash, dust, or other contamination.
- Mobile units must prepare and keep their equipment, food and ingredients at a licensed facility. This may include an additionally licensed food establishment or warehouse operated by the mobile unit owner.

Other: FDA Food Code: 6-202.111, 6-202.112

- Mobile food units cannot operate in a private home.
- Living or sleeping areas within a mobile food unit must have full walls and solid self-closing doors to separate them from food operations.

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The following information in **Tables 1 and 2: Mobile Food Unit Classifications and General Requirements and Limitations**, explains the differences between Class 1, 2, 3, and 4 mobile food units and pushcarts.

The following information in **Table 3: FDA Food Code Mobile Food Establishment Matrix**, explains the Food Code requirements for mobile food units and pushcarts based on the type of food being prepared or provided. **To use the table, read down the columns based on the menu and operation in use.** For example, if only prepackaged time/temperature control (TCS) for safety food is served, then requirements listed in the TCS Food Menu - Prepackaged column apply. Likewise, if only food that is not time/temperature control for safety food is prepared on board, then requirements listed in the Non-TCS Food Preparation column apply.

Table 1: Mobile Food Unit Classifications	
Mobile food unit classifications are based on the menu and preparation steps. A mobile unit can serve menu items within its classification number or below.	
Class I Mobile Units with no refrigeration	These units can only serve commercially prepackaged and labeled food and drinks. They must not need temperature control for safety (TCS). <i>Examples: prepackaged chips, crackers, cookies, soda, and sweets.</i> These units DO NOT require a mobile unit license for operation. An additional warehouse license may be required.
Class II Refrigerated or Hot Mobile Units	These units can only serve packaged TCS and non-TCS foods and packaged drinks. The food items may be prepared at a licensed restaurant or commissary operated by the permit holder or through commercial means. No open packages of food or beverage on the unit is allowed. <i>Examples: packaged sandwiches, ice cream bars, and hot dogs that are cooked and wrapped prior to being on the unit.</i>
Class III Mobile Units, including Pushcarts	These units serve TCS and Non-TCS foods with <u>limited assembly</u> . Preparation, assembly, or cooking of raw animal foods <u>is not allowed</u> . Precooked foods, from a licensed facility, may be reheated on the unit. Customer self-service of unpackaged food <u>is not allowed</u> . Menu items need prior approval and require review during a pre-operational inspection. <i>Examples: packaged salads, packaged meat and cheese trays, hot dogs, shaved ice, scooping ice cream into a cone or dish.</i>
Class IV Mobile Units	These units serve TCS and Non-TCS foods, including raw animal foods that are prepared, cooked, cooled, or reheated, and assembled. The menu is unlimited, but processes must be reviewed at a pre-operational inspection. <i>Examples: Fully equipped self-contained Mobile Food Units. All meats, fish, poultry, plant foods, and dairy.</i>

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Table 2: Mobile Food Unit General Requirements and Limitations

Requirements	Class I	Class II	Class III	Class IV
Plan Review	No	Yes	Yes	Yes
Commissary or Warehouse required	*	*	*	*
Pushcart operation	Yes	Yes	Yes	No
Full service operation	No	No	***Yes	Yes
CFPM	No	No	Yes	Yes
Employee Health Policy	No	No	Yes	Yes
Assembly or preparation is allowed	No	No	***Yes (Limited)	Yes
Cooking is allowed	No	No	Reheating only	Yes
Cold holding equipment	No	**Yes	**Yes	**Yes
Hot holding equipment	No	**Yes	**Yes	**Yes
Hot & Cold water supply	No	No	Yes	Yes
Waste water tank	No	No	Yes	Yes
Handwashing sink	No	No	Yes	Yes
Dish washing sinks	No	No	Yes	Yes
Adequate ventilation	No	No	Yes	Yes
Examples	Pre-packaged non-TCS foods. Snacks, sodas, cookies, chips, crackers	Pre-packaged TCS and Non-TCS foods. Ice cream, frozen meats, sandwiches	Pre-cooked foods with limited assembly. Hot dogs, shaved ice, etc.	No Menu Limitations. BBQ, tacos, pizza, other similar menus.

* An additional licensed commissary or warehouse may be required based upon the plan and menu review and pre-operational inspection.

** Holding equipment is based on food type.

*** Limited food assembly. On-site menu and processes shall be provided during a plan review and preoperational inspection for approval.

For specific questions:

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Table 3: FDA FOOD CODE MOBILE FOOD ESTABLISHMENT MATRIX			
Food Code	Time/Temperature Control for Safety (TCS) Food Menu		Non-TCS Food Menu
Areas/Chapter	Food Preparation	Prepackaged	Food Preparation
Personnel	Applicable Sections of Parts 2-2 - 2-4 5-203.11 (C)	Applicable Sections of Parts 2-2 - 2-4 5-203.11 (C)	Applicable Sections of Parts 2-2 - 2-4 5-203.11 (C)
Food	3-101.11 3-201.11-.16 3-202.16; Applicable Sections of Part 3-3; 3-501.16 3-501.18(A)	3-101.11 3-201.11-.16 3-303.12(A) 3-501.16 3-305.11; 3-305.12 (Applicable to Service Area or Commissary)	3-101.11; 3-201.11 3-202.16; Applicable Sections of Part 3-3
Temperature Requirements	3-202.11; Applicable Sections of Parts 3-4 & 3-5	3-202.11 3-501.16	NONE
Equipment Requirements	Applicable Sections of Parts 4-1 - 4-9 and 5-5	Applicable Sections of Parts 4-1 - 4-2; 4-6 and 5-5	Applicable Sections of Parts 4-1 - 4-2; 4-5 - 4-6 and 5-5
Water & Sewage	5-104.12 5-203.11(A) & (C) Part 5-3; 5-401.11 5-402.13-.15	5-104.12 5-203.11(A) & (C) Part 5-3; 5-401.11 5-402.13-.15	5-104.12 5-203.11(A) & (C) Part 5-3; 5-401.11 5-402.13-.15
Physical Facility	6-101.11; 6-201.11 6-102.11(A) & (B) 6-202.15; 6-501.11 6-501.12; 6-501.111	6-101.11 6-102.11(A) & (B) 6-202.15 6-501.111	6-101.11; 6-201.11 6-102.11(A) & (B) 6-202.15; 6-501.11 6-501.12; 6-501.111
Toxic Materials	Applicable Sections of Chapter 7	Applicable Sections of Chapter 7	Applicable Sections of Chapter 7
Servicing	6-202.18 As necessary to comply with Food Code	6-202.18 As necessary to comply with the Food Code	6-202.18 As necessary to comply with the Food Code
Compliance and Enforcement	Applicable Sections of Chapter 8 and Annex 1	Applicable Sections of Chapter 8 and Annex 1	Applicable Sections of Chapter 8 and Annex 1