VHA Infection Control Risk Assessment for Construction, Renovation and Maintenance

Introductory Information and Instructions

Use this template as a baseline for performing facility Infection Control Risk Assessments (ICRAs) for construction, renovation, and maintenance work (referred to as the "activity" in this document). The template provides minimum requirements for categorizing activity types and patient risk to determine the level of precautions needed to prevent infection risks. Facilities may customize this template to incorporate site-specific information and/or to add more stringent criteria.

This VHA ICRA template pertains specifically to infection prevention. It must be used if required by the VHA Pre-Construction Risk Assessment (PCRA) for the activity. *NOTE: The PCRA addresses other activity-related safety concerns (e.g., vibration, noise, hazardous materials) outside the scope of the ICRA.*

To complete the template:

1. Use **Table 1** to identify the category of the construction, renovation and/or maintenance activity.
2. Use **Table 2** to identify the areas affected by the activity.
3. Use **Table 3** to identify the overall patient risk category that will be affected by the activity.
4. Use **Table 4** to determine the level of infection prevention and control precautions needed for the activity.

Once all 4 steps above are completed: Refer to **Table 5** for the minimum required control measures for the level of infection prevention and control precautions needed for the activity. Refer to **Table 6** for the minimum infection prevention and control measures required on completion of the activity.

PERMIT: See the last page of this document for a fillable permit form to be used for posting at the activity site as needed.

Table 1 - Construction, Renovation, and/or Maintenance Activity Category

NOTE: *If any of the bulleted criteria in a higher activity category pertains to the work that will be done (even if the other criteria are in a lower category), use the higher activity category for the VHA ICRA.*

Activity Category determined from Table 1 (*A, B, C, or D*): D

Category A	**Inspection and/or facility upkeep generally defined as follows**: • Work can be completed in a single shift, not to exceed 10 hours. • Patients and/or employees may be in the area depending on the activity. • Work that does not create dust or debris. • Removal of ceiling tile or access to mechanical or electrical chase for visual inspection limited to 1 tile per 50 square feet with limited exposure time (not to exceed an hour for each tile) within the shift. • Minor interior updates (e.g., replacing floor or ceiling tiles, carpentry work to include hanging signage, and painting without sanding) that do not create dust or debris. • Limited building system maintenance such as basic plumbing on potable systems (e.g., faucet replacement) or basic electrical work such as replacement of light bulbs, receptacles, or switches.
Category B	**General maintenance and repair work generally defined as follows:** • Prolonged inspection and work that may take longer than a single shift but not exceeding a week. • Patients and employees are not to be in the area until activity is completed. • Work that creates minimal dust and debris.

	• Interior finish or surface repairs, updates, or modifications such as repair of firewalls and barriers, and new flooring that produces minimal dust and debris. Controlled sanding activities (e.g., wet or dry sanding) that produce minimal dust and debris. • Plumbing work such as installation or replacement of a single fixture or piping for a single fixture. Any work on sanitary plumbing including snaking of drains. • Electrical work such as installation of cabling/wiring/conduit for a single device, installation of new device such as a light fixture that produces minimal dust and debris. • Air Handler and/or fan shutdown/startup and HVAC work such as replacement of a single diffuser, single terminal unit or a single device that produces minimal dust and debris.
Category C	**Small-scale construction, renovation, or maintenance generally defined as follows**: • Work requiring longer than a single week to complete but not exceeding 6 months. • Patients and employees are not to be in the area until activity is completed. • Demolition/removal of preexisting floor covering, casework, lay-in ceiling, or other architectural elements. • Demolition/removal of more than 32 ft^2 of drywall/framing, hard ceilings, and doors/framing and minimal infrastructure such as electrical circuits and branch piping. • Installation of new walls, ceilings and doors including framing, drywall/plaster and associated work. • Plumbing work such as the installation of new sinks, showers and toilets and associated plumbing. • Shut down of sections of potable water systems. • Electrical work such as installation of conduit and wire for lighting, receptacles and switches for an area, the installation of conduit and wire for new devices such as terminal units, fans etc. • Modification of existing fire alarm and suppression systems. • Mechanical work such as the installation of ductwork, diffusers, and terminal units for an area.

Category D	**Large-scale construction, renovation, or maintenance generally defined as follows**:
	• Work exceeding 6 months in duration.
	• Patients and employees are not to be in the area until activity is completed.
	• Large-scale demolition of building components and infrastructure including removal of multiple doors, walls, framing, ceilings, flooring, piping, electrical and HVAC.
	• The installation building components such as new walls, ceilings and doors including framing, drywall and associated plaster work.
	• Plumbing work such as the installation of:
	  ○ new medical gas systems,
	  ○ steam/heating hot water, condensate systems,
	  ○ multiple sinks, showers and toilets including associated plumbing.
	• Shutdown of potable water, steam/heating hot water, condensate, and medical gas systems.
	• Electrical work such as installation of electrical feeders, distribution panels, conduit and wire for lighting, receptacles and switches for an area, the installation of conduit and wire for new devices such as terminal units, fans etc.
	• Installation of fire alarm and suppression systems.
	• Electrical shutdown of multiple panels.
	• Mechanical work such as the installation of air handling equipment, associated ductwork, diffusers, heat exchangers, terminal units and controls.

Table 2 - Affected Area Assessment

Identify the areas and associated patients that will be affected by the construction/renovation/maintenance activity (see the Figure for a visual representation of adjacent affected areas).

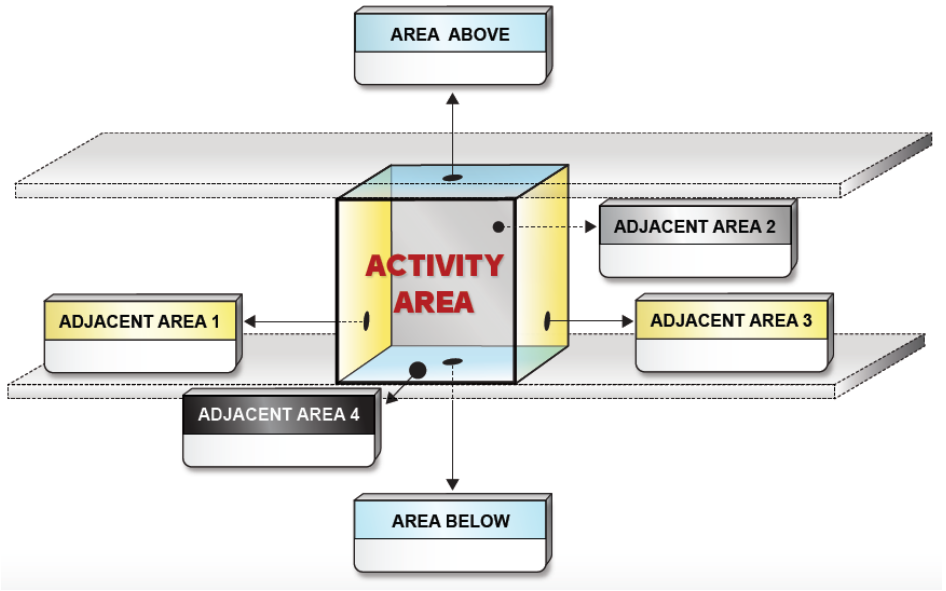

Figure: Isometric drawing of affected area assessment

Area	Service(s)/Type(s) of Area(s) *(e.g., OR, Unit/Ward, Sterile Processing, Administrative, etc.)**	Point of Contact (POC)	POC Contact Information
Activity Area**	Bulk O2 Storage Area	William Shattuck	(857) 203-6432
Area Above	N/A	N/A	N/A
Area Below	N/A	N/A	N/A
Adjacent Area 1	Contracting Lot	Mike Maggiore	(857) 203-6687
Adjacent Area 2	Bldg. 2 - Therapeutic Pool	Eduardo Lopez	(857) 203-5148
Adjacent Area 3	Bldg. 2 - Pharmacy Trailer	Marci Salow	(857) 203-5444
Adjacent Area 4			

* There may be more than one Service/type of area for each row. List all.

** List the area(s) in which the construction/renovation/maintenance activity will occur. ***NOTE: When the Activity Category is B, C, or D, the control measures are determined by the Patient Risk in the adjacent affected areas.***

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Table 3 - Patient Risk Category

Using Table 3, identify the patient risk category for each area listed in Table 2. Of the patient risk categories identified, select the one with the greatest risk as the overall Patient Risk Category for the activity.

Overall Patient Risk Category determined from Table 3 (*Low, Medium, High, or Highest*): Low

Low Risk	Medium Risk	High Risk	Highest Risk
Non-patient care areas such as:	Patient care support areas such as:	Patient care areas such as:	Procedural, invasive, sterile support and highly compromised patient care areas such as:
• Public hallways and gathering areas not in clinical areas • Office areas not in clinical areas • Breakrooms not in clinical areas • Bathrooms or locker rooms not in clinical areas • Mechanical/electrical rooms not in clinical areas	• Waiting areas • Clinical engineering (biomedical) • Materials management • Sterile processing department – dirty side • Kitchen, cafeteria, gift shop, coffee shop, and food kiosks	• Patient care rooms and areas, including spinal cord injury units • All acute care units, including mental health • All outpatient units and clinics • Emergency department • Community Living Centers, domiciliaries, and transitional residences • Employee health • Pharmacy – general work zone • Medication rooms and clean utility rooms • Imaging suites – diagnostic imaging • Laboratory	• All transplant units • All intensive care units • All oncology units and chemotherapy/infusion centers • OR theaters and restricted areas • Hemodialysis units • Procedural rooms* • Pharmacy compounding area • Sterile processing department – clean side • Transfusion services • Imaging suites – interventional imaging • Dedicated isolation wards/units for infectious diseases

***** Procedural Rooms are designated for the performance of patient care activities that may require high-level disinfected or sterile instruments and some environmental controls but is not required to be performed with the environmental controls of an operating room (OR). The room is intended for procedures that are performed in an aseptic surgical field and penetrates the protective surfaces of a patient's body (e.g., subcutaneous tissue, mucous membranes, cornea) or entry into or opening of a sterile body cavity. Examples of these spaces include, and are not limited to, Cardiac Catheterization Suites, Electrophysiology Suites, Endovascular/GI Suites, Angio Suites and other spaces which may have high risk patient populations.

Table 4 - Level of Infection Prevention and Control Precautions

Match the Overall Patient Risk Category (*Low, Medium, High, Highest*) determined from Table 3 with the planned Construction/Renovation/Maintenance Activity Category (*A, B, C, D*) from Table 1 to determine the minimum Level of Infection Prevention and Control Precautions (*I, II, III, or IV*) using Table 4 below.

Level of Precautions determined from Table 4 (*I, II, III, or IV*): III

Patient Risk Category	**Activity Category**			
	A	**B**	**C**	**D**
Low Risk	I	II	II	III
Medium Risk	I	II	III	IV
High Risk	I	II	IV	IV
Highest Risk	II	III	IV	IV

An infection prevention and control permit is required for Level III and Level IV. Consult with Infection Prevention and Control for Level I and Level II.

Table 5 - Required Infection Prevention and Control Measures, by Level of Precautions

Controls defined below for the Level of Precautions identified for the activity must be in place before the activity begins and maintained until work is completed and the area is activated. Control measures for each Precaution Level must also include the control measures in the preceding Level(s).

As the activity progresses, a full re-evaluation of remaining activity type and patient risk is required prior to downgrading the Level of Precautions.

Level of Precautions	**Control Measures**
Level I	1. Perform work activity in a manner that does not create dust. 2. Immediately replace any ceiling tile, close access panels, etc., upon completion of work. 3. Any materials and equipment being brought into the facility must be free of contaminants and loose material.
Level II	**All control measures in Level I and the following:** 1. Provide active means to control airborne dust from dispersing into occupied areas and/or water mist surface to control dust (e.g., Mobile Dust Containment Cart or some other system). 2. Ensure worker clothing is clean and free of visible dust before leaving the work area. 3. Remove or isolate air diffusers (supply and return) to protect the HVAC system from dust and reduce air turbulence. Rebalance system to address diffuser isolation.

	4. When the work involves or impacts potable water systems including stagnation due to reduced usage, the piping shall be flushed twice a week or isolated from the main system. 5. Seal doors to prevent dust migration. 6. Contain all trash and debris in the work area. Perform daily cleaning and disposal of trash (covered) from work area using an identified exit route. 7. Any equipment, tools, or materials removed from the work area must be in sealed containers and/or cleaned of dust and debris prior to removal from the area. 8. Nonporous/smooth and cleanable containers (with a hard lid) must be used to transport trash and debris from the construction areas. These containers must be damp-wiped cleaned and free of visible dust/debris before leaving the contained work area. 9. Install a sticky (dust collection) mat at entrance of contained work area based on facility policy. Sticky mats must be changed routinely and when visibly soiled. 10. Maintain clean surroundings when area is not contained by damp mopping or HEPA vacuuming surfaces at least daily.
Level III	**<u>All control measures in Levels I and II</u> and the following:** 1. Ensure availability of equipment for cleaning hands. 2. Construct and complete critical barriers meeting NFPA 241 requirements. Barriers must extend to the ceiling or if ceiling tile is removed, to the deck above. 3. All (plastic or hard) barrier construction activities must be completed in a manner that prevents dust release. Plastic barriers must be effectively affixed to floor and ceiling (or floor/roof deck above) and secure from movement or damage. 4. Seal all penetrations in containment barriers, including floors and ceiling, using approved materials (UL schedule firestop if applicable for barrier type). 5. Maintain .01 inches /water gauge negative pressurization of the entire workspace by use of HEPA exhaust air systems directed outdoors, or comply with the alternative method outlined in Appendix A of this document. These control measures must be maintained continuously 24/7 for the duration of the project. HEPA filtered exhaust if discharged directly to the outdoors must be at a distance of 25 feet or greater from entrances, air intakes and operable windows. Exhausting discharged air into shared or recirculating HVAC systems, or other shared exhaust systems (e.g., bathroom exhaust) is <u>prohibited</u>. 6. Install a differential pressure sensing device (e.g., magnehelic, manometer, or digital monitoring) on exterior of work containment to continually monitor and document negative pressurization. The “ball in the wall” or similar apparatus are <u>not acceptable</u>.
Level IV	**<u>All control measures in Levels I, II and III</u> and the following:** 1. Barriers must be hard barriers unless temporary to install final barrier. 2. Containment must include an anteroom to ensure pressure control. Anteroom must be large enough for equipment staging, cart cleaning, workers’ PPE and cleaning. 3. Worker clothing and/or PPE must be removed or clean and free of visible dust before leaving the work area anteroom. HEPA vacuuming of clothing or use of cover suits is acceptable. 4. Workers must wear shoe covers or have a method to clean shoes in anteroom. Shoe covers must be removed prior to exiting the anteroom to the occupied space (non-work area). Damaged shoe covers must be changed immediately.

Table 6 - Minimum Infection Prevention and Control Measures Required Upon Completion of the Activity

Controls defined below shall be completed upon completion of the activity and inspected prior to terminating measures defined in Table 5.

Level of Precautions	Measures
Levels I - II	**Cleaning:** 1. Clean work areas including all environmental surfaces, high horizontal surfaces and flooring materials. 2. Check all supply and return air registers for dust accumulation on upper surfaces as well as air diffuser surfaces. **HVAC Systems:** 1. Remove isolation of HVAC system in areas where work is being performed. Verify that HVAC systems are clean and operational. 2. Verify the HVAC systems meet original airflow and air exchange design specifications. **Water systems:** 1. Until the potable water system is activated and in use, flushing shall continue at least twice per week in accordance with VHA Directive 1061.
Levels III - IV	Construction areas must be inspected by an infection preventionist and engineering representative (and others as determined by the facility) for final activity/project close out and removal of infection prevention and control measures. **Work Area Cleaning:** 1. Clean work areas including all environmental surfaces, high horizontal surfaces and flooring materials. 2. Check all supply and return air registers for dust accumulation on upper surfaces as well as air diffuser surfaces. **Removal of Critical Barriers:** 1. Critical barriers must remain in place during all work involving drywall removal, creation of dust and activities beyond simple touch-up work. The barrier may NOT be removed until a work area cleaning has been performed. Additional cleaning may be needed after removal of barrier. 2. All (plastic or hard) barrier removal activities must be completed in a manner that prevents dust release. Use the following precautions when removing hard barriers: i. Carefully remove screws and painter tape. ii. If dust will be generated during screw removal, use hand-held HEPA vacuum. iii. Drywall cutting is prohibited during removal process. iv. Clean all stud tracks with HEPA vacuum before removing outer hard barrier. v. Use a plastic barrier to enclose area if dust could be generated. **Negative Air Requirements:** 1. The use of negative air must be designed to remove contaminants from the work area. 2. Negative air devices (fans, filters, monitoring and documentation equipment) must remain operational at all times and in place for a period after completion of dust creating activities to remove contaminants from the work area and before removal of critical barriers. **HVAC systems:** 1. Upon removal of critical barriers, remove isolation of HVAC system in areas where work is being performed. 2. Verify that HVAC systems are clean and operational. 3. Verify and document through a TAB the HVAC systems meets original airflow and air exchange design specifications. **Water systems:** 1. Until the potable water system is activated and in use, flushing shall continue at least twice per week in accordance with VHA Directive 1061.

Infection Prevention and Control Construction/Renovation/Maintenance Permit

This page must be posted at the entrance to the project area for Level III and Level IV activities.

Unique permit number: 523-25-003 Bulk Oxygen Corrections			
Location of construction/renovation/maintenance	West Roxbury - Outside Behind Bldg. 2; Adjacent to Contracting Lot		
Project manager	Naweed Azad	Project start date	TBD
Contact phone number	617-359-8589	Completion date	TBD
Contractor	TBD	Permit expiration date	TBD

Activity Category (*A, B, C, or D*)	D	Overall Patient Risk Category (*Low, Medium, High, or Highest*)	Low	Level of Infection Prevention and Control Precautions (*I, II, III, or IV*)	III

Level of Precautions	Control measures to be in place for the duration of the activity (*Check the box for the activity's Level of Precautions to indicate the Control Measures*)
Level I ☑	1. Perform work activity in a manner that does not create dust. 2. Immediately replace any ceiling tile, close access panels, etc., upon completion of work. 3. Any materials and equipment being brought into the facility must be free of contaminants and loose material.
Level II ☑	**All control measures in Level I and the following:** 1. Provide active means to control airborne dust from dispersing into occupied areas and/or water mist surface to control dust (e.g., Mobile Dust Containment Cart or some other system). 2. Ensure worker clothing is clean and free of visible dust before leaving the work area. 3. Remove or isolate air diffusers (supply and return) to protect the HVAC system from dust and reduce air turbulence. Rebalance system to address diffuser isolation. 4. When the work involves or impacts potable water systems including stagnation due to reduced usage, the piping shall be flushed twice a week or isolated from the main system 5. Seal doors, to prevent dust migration. 6. Contain all trash and debris in the work area. Perform daily cleaning and disposal of trash (covered) from work area using an identified exit route. 7. Any equipment, tools, or materials removed from the work area must be in sealed containers and/or cleaned of dust and debris prior to removal from the area. 8. Nonporous/smooth and cleanable containers (with a hard lid) must be used to transport trash and debris from the construction areas. These containers must be damp-wiped cleaned and free of visible dust/debris before leaving the contained work area. 9. Install a sticky (dust collection) mat at entrance of contained work area based on facility policy. Sticky mats must be changed routinely and when visibly soiled. 10. Maintain clean surroundings when area is not contained by damp mopping or HEPA vacuuming surfaces at least daily.
Level III ☑	**All control measures in Levels I and II and the following:** 1. Ensure availability of equipment for cleaning hands. 2. Construct and complete critical barriers meeting NFPA 241 requirements. Barriers must extend to the ceiling or if ceiling tile is removed, to the deck above. 3. All (plastic or hard) barrier construction activities must be completed in a manner that prevents dust release. Plastic barriers must be effectively affixed to floor and ceiling (or floor/roof deck above) and secure from movement or damage. 4. Seal all penetrations in containment barriers, including floors and ceiling, using approved materials (UL schedule firestop if applicable for barrier type). 5. Maintain .01 inches /water gauge negative pressurization of the entire workspace by use of HEPA exhaust air systems directed outdoors, or comply with the alternative method outline in Appendix A of the VHA ICRA template. These control measures must be maintained continuously 24/7 for the duration of the project. Exhausting discharged air into shared or recirculating HVAC systems, or other shared exhaust systems (e.g., bathroom exhaust) is prohibited. **Check box to indicate exhaust method:** Exterior ☑ Alternative Interior Method ☐ 6. Install a differential pressure sensing device (e.g., magnehelic, manometer, or digital monitoring) on exterior of work containment to continually monitor and document negative pressurization. The "ball in the wall" or similar apparatus are not acceptable.
Level IV ☐	**All control measures in Levels I, II and III and the following:** 1. Barriers must be hard barriers unless temporary to install final barrier. 2. Containment must include an anteroom to ensure pressure control, Anteroom must be large enough for equipment staging, cart cleaning, workers' PPE and cleaning. 3. Worker clothing and/or PPE must be removed or clean and free of visible dust before leaving the work area anteroom. HEPA vacuuming of clothing or use of cover suits is acceptable. 4. Workers must wear shoe covers or have a method to clean shoes in anteroom Shoe covers must be removed prior to exiting the anteroom to the occupied space (non-work area). Damaged shoe covers must be changed immediately.

Additional requirements:	Review air intakes/handlers prior to excavation of soil, rocks, concrete or other materials. Provide active means to control airborne dust from dispersing into occupied areas (pool and pharmacy trailer) and/or water mist surface to control dust (e.g., Mobile Dust Containment Cart orsome other system).			
Project Manager signature	NAWEED AZAD	Digitally signed by NAWEED AZAD Date: 2025.06.25 14:40:32 -04'00'	Date	
Infection Preventionist signature	JENNIFER MCMILLAN	Digitally signed by JENNIFER MCMILLAN Date: 2025.06.26 09:25:32 -04'00'	Date	

Appendix A: Alternative To Outdoor Exhaust Requirements

This Appendix provides an equivalent ICRA control measure to requirements detailed in this VHA ICRA template (Table 5 Level III, item 5) that would allow interior construction space exhaust.

Interior Construction Space Exhaust:

If the facility is not able to exhaust to the building exterior, the Healthcare Environment and Facilities program office has identified an alternate industry-recognized standard interior exhaust procedure that is accepted as providing an equivalent level of infection prevention and control (IPC), and safety. The alternate interior exhaust procedure is implemented by completing the following:

a. If exhaust is directed indoors, then the system must be HEPA filtered. Prior to start of work, including assembly of the ICRA barriers, initial baseline air sampling measurements for particulate levels must be taken in the planned area of discharge. Once containment is erected and completed, HEPA filtration must then be verified by particulate measurement, using a particle counter with multi-channel capabilities to measure down to 0.3 microns, to confirm that the discharge of the HEPA unit does not exceed the baseline particulate count of the area to which the exhaust is directed. Verification must continue at least three times per day (once every 8 hours), 7 days per week, during the use of the negative air machine and HEPA filter. Any exceedance must trigger a work stoppage and an immediate response and resolution. All particulate measurements, including the baseline measurement, must be documented and retrievable.
b. To accommodate the sampling, the negative air pressure machine must be fitted with a 2 ft section of rigid ductwork at the discharge. The sample port for monitoring must be in the rigid ductwork section.
c. Vapor generating processes must be assessed and appropriate filtration must be installed to mitigate transmission to the facility.
d. Engineering must do a complete flow and pressure analysis and document the area to which the air is being discharged to ensure the flow and pressure relationships in that area are not being adversely impacted by the additional flow. Ideally, this is done as part of the construction package to ensure the design is implementable and no additional HVAC changes are required to accommodate the exhaust from the negative air equipment.
e. Install device on exterior of work containment to continually monitor negative pressurization. To ensure proper pressure is continuously maintained, the device(s) shall have a visual pressure indicator, data collection and alarm.
f. Exhaust must be directed to Low Risk areas as defined in Table 3 in this VHA ICRA template. Ideally this discharge must be located so as not to impinge on high traffic areas or create a nuisance with noise or excessive airflow.
   NOTE: *Exhaust into shared or recirculating HVAC systems, or other shared exhaust systems (e.g., bathroom exhaust) is not acceptable.*