

CONSTRUCTION INFECTION CONTROL RISK ASSESSMENT

1. PURPOSE: To establish Medical Center policy and procedure for review of construction projects to ensure compliance with all safety, infection control and occupational health parameters during construction operations.

2. POLICY: It is the policy of this Medical Center to construct projects that comply with Veterans Affairs (VA) Construction Standards, VA Guidelines for Infection Control, Guidelines for Environmental Infection Control in Health-Care Facilities from the Centers for Disease Control (CDC) and The Joint Commission (TJC).

a. **Assessment.** An Infection Control Risk Assessment (ICRA) will be required for every renovation and new construction project that will generate dust, dirt, removal of ceiling tiles and any health hazard conditions (as determined by the Infection Control) within and outside an occupied facility and patient risk areas. The ICRA team will perform the ICRA with expertise in facility design, maintenance and operations, construction, ventilation, epidemiology, environmental management service (EMS), and safety. The team will provide documentation of the risk assessment(s) during initial planning and in all construction phases. Based on the ICRA, an Infection Control Construction Permit will be issued for each project (See Attachment B). Infection Control Construction Permits shall be posted in plain view on all construction sites. Each permit will be filed electronically on the engineering shared drive: ICRA PERMITS and hard copies located in Engineering.

b. **ICRA Requests.** The construction infection control permitting process shall be initiated or requested prior to work being accomplished by the Contracting Officer Representative (COR) for contract construction and the Maintenance and Operations (M&O) Supervisor for in-house staff construction activities. The COR or M&O Supervisor requesting an ICRA permit shall obtain a copy of the floor plans that shows the areas where the construction activities will occur. They shall contact the users, the contractor for contract projects and/or persons of interest that may be affected, to be in attendance at the permitting process. If the contractor for construction activity is not present or unavailable for the permitting process, the COR shall brief the contractor on the infection control risk assessment precautions in the permit as it pertains to the construction activity.

c. **Employees.** All construction workers, including in-house employees and subcontractors shall follow the infection control procedures as identified in the permit.

d. **Meetings and Inspections.** Infection Control will participate in pre-construction meetings and weekly construction site walk-through inspection whenever possible.

e. **Pest Control.** EMS employee(s) will be involved in any phase of the construction process where infestation may present a problem. EMS will conduct walk-through inspections as directed.

3. ACTION:

a. Responsibilities

(1) **Certification.** The COR, ICRA Requesting Official or ICRA Champion shall be responsible for certifying that each contract construction project complies with this policy.

(2) **Inspections.** The COR, ICRA Requesting Official, ICRA Champion, Infection Control and EMS are responsible for performing Construction Site Inspections, as appropriate. The Construction Site Inspection Summary Sheets (See Attachment C) will be documented for each visit certifying compliance or non-compliance.

(3) **Statement of Authority.** Infection Control has the authority to institute any pertinent control measures or studies when there is danger to any patient or employee. This decision will be based on reasonable data from reliable sources.

b. Procedures

(1) **Administration.** The COR, ICRA Requesting Official, ICRA Champion, Infection Control and EMS assigned to the administration of construction projects will ensure compliance with this policy and all applicable codes. A construction site inspection will be utilized to document conformance.

(2) **Non-Recurring Maintenance (NRM).** The COR for Non-Recurring Maintenance contract construction projects will insure that project drawings and specifications are submitted to the Veterans Integrated Service Network (VISN 15) safety and station safety staff for review and comment.

(a) Planning and Construction Phase. Infection Control and Safety Service will participate in pre-construction meetings to complete an Infection Control Risk Assessment ICRA, and a pre-construction Risk Assessment (PCRA) (See Attachment D) for both in-house work and outside contracted construction. EMS will be involved when the project involves pest control concerns. Air Quality Risk Assessment is included in the (PCRA).

(b) Planning and Design Review. Infection Control will be involved in the planning phases and design reviews for all renovation and new construction projects specific to the following major components (schematic design):

1. Number and placement of isolation rooms.
2. Barriers to control dust, noise and air quality.
3. Air handling systems; use of additional measures such as ultraviolet germicidal irradiation (UVGI).
4. Number and placement of hand washing facilities.

5. Staff and patient traffic patterns for the duration of the project.
6. Relocation decisions regarding patient care areas, storage areas, etc.
7. Water supply and plumbing, including fixtures.
8. Construction waste containment, transport and disposal. To include exterior waste water containments.
9. Selection and installation of medical equipment as it relates to infection control.
10. Selection of finishes and surfaces that can be effectively cleaned.
11. Accommodation of personal protective equipment (accessibility, security, sanitation, etc.)
12. Storage of moveable modular equipment.

(c) COR. When planning for size, configuration, and equipping of the space for renovated, altered, or new construction, the COR shall ensure VA design guides and manuals are followed.

(d) ICRA. When planning demolition, construction or renovation, the Projects Supervisor, COR, Maintenance & Operations (M&O) Foreman, Program or Nurse Manager, Infection Control, EMS Chief and Safety Construction Officer shall conduct a proactive ICRA using risk criteria to identify hazards that could potentially compromise care, treatment, or services in patient occupied areas.

1. This assessment shall address the impact of demolition, renovation, or new construction on air quality requirements, infection control, utility requirements, noise, vibration, and emergency procedures.

2. An ICRA shall be performed that evaluates the impact of demolition, renovation, or new construction on infection control.

(3) Operational Phase.

(a) Medical Waste.

1. EMS staff shall remove any medical waste, including sharps containers, from areas to be renovated or constructed PRIOR to the start of the project.

2. Infection Control and EMS shall be notified immediately if unexpected medical waste is encountered.

(b) Barrier Walls. Construction, demolition, or renovation sites must be separated from other areas by fire resistive barriers that keep the dirt, dust and minimize noise/vibration inside the worksite.

1. The integrity of the barrier walls must assure a complete seal of the construction area from adjacent areas.

2. Rigid construction or fire-rated plastic sheeting (4 to 6 mil thickness) is used, depending on the location of the project, adjacent uses, and duration of the project. The COR or M & O Foreman shall approve barrier material.

3. Walls will be dustproof with airtight seals maintained at the full perimeter of the walls as well as all penetrations.

4. Seal off air vents near construction area as required after coordination with COR to ensure non-interference with HVAC and negative-pressure systems.

(4) Traffic Control.

(a) Entry and Exit. Designated entry and exit procedures will be defined (in conjunction with any necessary Interim Life Safety Measures) for each construction project where applicable.

(b) Egress. All egress pathways will be free of debris.

(c) Unauthorized personnel. Unauthorized personnel will not be allowed to enter the construction zone.

(d) Designated Elevators. Only designated elevators will be used for construction activities during scheduled times.

(e) Mats. Tacky or walk-off mats will be placed at entrances/exits of work area and replaced daily or more frequently if necessary. (Dust mats shall be furnished by the Contractor for contract work.)

(f) Debris. Debris, when transported through hospital areas, must be completely covered to contain dust during transport. If possible, there will be no transportation of debris through patient care areas. If possible, debris shall be removed in evenings or non-duty times. All cart wheels must be cleaned before leaving the construction area.

(5) Cleaning.

(a) Entry Areas. The construction zone and adjacent entry areas shall be maintained in a clean and sanitary manner by the contractors and will be High Efficiency Particulate Air (HEPA) vacuumed and wet mopped daily or more frequently as needed to minimize dust generation.

(b) Routine Cleaning. EMS will be responsible for the routine cleaning of adjacent areas and for the terminal cleaning of the construction zone before the opening of the newly renovated or constructed area.

(6) Personnel Requirements.

(a) Clothing. Clothing shall be free of loose soil and debris upon exiting the construction zone.

(b) Personal Protective Equipment. Contractor (or VA, for VA personnel), will provide personal protective equipment, including face shields, gloves, and N95 respirators to be utilized as appropriate for the task. Personnel entering sterile or invasive procedure areas will be provided with a disposable jump suit or scrubs, head coverings, and shoe coverings, which must be removed prior to exiting the work area.

1. Tools and equipment must be damp-wiped with a disinfectant prior to entry or exit from sterile and invasive procedure areas.

2. Tools and equipment soiled with blood and body fluids will be cleaned with an approved germicide.

(c) Training. Construction Infection Control Risk Assessment training is required for: facility maintenance staff, contract construction personnel, vendors that perform general maintenance, minor projects and service personnel requiring access into the ceiling areas within the patient risk group areas.

(d) Annual Training. Annual Training is required for all VA Facility Maintenance, and Service employees.

(7) Environmental Monitoring.

(a) Monitoring. Infection Control will plan for environmental monitoring as appropriate for the project.

(b) Debris. Demolition debris will be removed from the construction area in tightly fitted covered carts using specified traffic patterns daily.

(c) Mats. Tacky or walk-off mats shall be utilized immediately outside the construction zone to remove dust and soil from shoes, cart wheels, etc. as personnel exit the area. The tacky mat must be large enough to cover the entire exit and is changed whenever necessary.

(d) Seals. Exterior window seals must minimize infiltration of outside excavation debris. Windows will remain closed at all times.

(e) Demolition Chutes. When using demolition chutes, chute openings must be sealed when not in use. The chute and damper should be sprayed with water, as necessary, to maintain dust control.

(f) Plumbing. Control, collection and disposal must be provided for any drain liquid or sludge encountered when demolishing plumbing.

(8) Completion Phase.

(a) Ventilation. After completion of construction, ventilation will meet specifications as mandated by regulatory bodies.

(b) Cleaning. The area will be thoroughly cleaned and disinfected by EMS before placing into service.

(c) Water Supply. Domestic water supply lines will be flushed before placing newly renovated or constructed areas into service. The duration will be determined on a case-by-case basis.

(d) Approval. Final walk through and approval for re-use of the area.

(9) Compliance Monitoring. The COR, Safety, Infection Control and EMS, if applicable, and the contractor (or designee) will conduct compliance monitoring as necessary. The following parameters will be monitored:

(a) Air handling.

(b) Integrity of barrier walls.

(c) Dress code/Personal protective equipment.

(d) Environmental control.

(e) Noises.

(f) Traffic control.

(g) Water supply/Utilities.

(h) Vibrations.

(i) Emergency procedures.

(j) Air quality requirements.

4. DEFINITIONS: None

5. REFERENCES: VHA Directive 2004-012, dated April 5, 2004; TJC Standard EC.02.06.05 and MCM-QM-IC-05-204 CDC HICPAC Guidelines for Environmental Infection Control in HealthCare Facilities, dated 2003.

6. RESPONSIBILITY: The Chief of Engineering Service is responsible for the contents of this VAMC Memorandum.

7. RESCISSION: Medical Center Memorandum 001-138-10-578, dated February 3, 2010.

8. RECERTIFICATION: This Medical Center Memorandum will be re-certified on or before July 28, 2018. This policy remains in effect until rescinded or superseded.

A handwritten signature in dark ink, appearing to read 'D. Hutson', is written over the printed name.

DONALD H. HUTSON, FACHE
Medical Center Director

Attachments (4)

ATTACHMENT A

**MEDICAL CENTER MEMORANDUM
SEARCH TABLE**

Title	Construction Infection Control Risk Assessment
Service	Engineering
Program	Maintenance & Operations
MCM Number (Last 3)	578
Responsible Position	Chief of Engineering Service
JC Chapter	
JC Standard(s) optional	
Effective Date	July 28, 2015
Reissue Date	July 2018

ATTACHMENT B

Infection Control Construction Permit: As applicable on checked requirements					
Project Name:			Permit Number:		
Location of Construction:			Project Start Date:		
Project Coordinator:			Estimated Duration:		
Contractor Performing Work:			Permit Expiration Date:		
Supervisor:			1.		
Telephone:			2. Extended Date:		
			3. Extended Date:		
YES	NO	CONSTRUCTION ACTIVITY	YES	NO	PATIENT RISK GROUP
		TYPE A: Inspection, non-invasive activity			GROUP 1: Low Risk
		TYPE B: Small scale, short duration, moderate to high levels			GROUP 2: Medium Risk
		TYPE C: Activity generates moderate to high levels of dust			GROUP 3: High Risk
		TYPE D: Major demolition and/or construction activities that generates high levels of dust,			GROUP 4: Highest Risk
CLASS I		<input type="checkbox"/> Execute work by methods to minimize raising dust from construction operations. <input type="checkbox"/> Immediately replace any ceiling tile displaced for visual inspection. <input type="checkbox"/> All doors adjacent to work areas will be closed while ceiling tile removal is in progress.			
Date _____					
Initial _____					
CLASS II		Include previously checked requirements, plus the following:			
Date _____		<input type="checkbox"/> Provide active means to prevent air-borne dust from dispersing into atmosphere <input type="checkbox"/> Mist work surface with water or use wet technique for drilling and cutting. <input type="checkbox"/> Use HEPA vacuum system to control dust while cutting. <input type="checkbox"/> Seal unused doors <input type="checkbox"/> Wipe surfaces with hospital grade disinfectant, approved by VHA Commodities Standardization Committee <input type="checkbox"/> Seal holes, pipes, conduits, and punctures appropriately <input type="checkbox"/> Implement control cube method before construction begins			
Initial _____		<input type="checkbox"/> Contain construction waste before transport in tightly covered containers. <input type="checkbox"/> Wet mop and/or vacuum with HEPA filtered vacuum before leaving work area. <input type="checkbox"/> Place dust mat at entrance/exit of work area. <input type="checkbox"/> Block off, seal or isolate air vents in areas where work is being performed. <input type="checkbox"/> Clean cart wheels prior to leaving construction area <input type="checkbox"/> Isolate HVAC system in area where work is being done to prevent contamination of the duct system. <input type="checkbox"/> Maintain continuous negative air pressure within work site utilizing HEPA equipped air filtration units.			
CLASS III		Include previously checked requirements, plus the following:			
Date _____		<input type="checkbox"/> Complete all critical barriers or implement control cube method before construction begins. <input type="checkbox"/> Vacuum work area with HEPA filtered vacuums. <input type="checkbox"/> Wet mop daily and/or more often as needed, or as directed by COTR, with hospital grade disinfectant, approved by VHA Commodities Standardization Committee <input type="checkbox"/> Provide dust proof, fire rated temporary drywall construction barriers to completely separate construction from the operational areas of the hospital in order to contain dirt, debris, minimizing noise or vibration and dust. Barriers shall be sealed and made presentable on the hospital occupied side. Install a self-closing rated door in a metal frame, commensurate with the partition, to allow worker access. <input type="checkbox"/> Maintain negative air at all times. <input type="checkbox"/> A fire retardant polystyrene 6-mil thick or greater plastic barrier can be used also.			
Initial _____		<input type="checkbox"/> Cover transport receptacles or carts. <input type="checkbox"/> Do not remove barriers from work area until complete project is thoroughly cleaned by construction personnel. <input type="checkbox"/> Remove barrier materials carefully to minimize spreading of dirt and debris associated with construction. <input type="checkbox"/> Environmental Services will clean the area prior to normal use of the area resumes. <input type="checkbox"/> Project Infection Control Team or designee will inspect the area before normal use of the area is resumed <input type="checkbox"/> Notify Infection Control Team or designee upon project completion.			

CLASS IV Date _____ Initial _____	Include previously checked requirements, plus the following: <input type="checkbox"/> Construct anteroom and require all personnel to pass through this room so they can be vacuumed using a HEPA vacuum cleaner before leaving work site or they can wear cloth or paper coveralls that are removed each time they leave the work site. <input type="checkbox"/> All personnel entering work site are required to wear shoe covers																																																																																																																																																																																												
Additional Requirements: <u>When box is checked you must follow the instruction</u> <input type="checkbox"/> When working in Buildings 1 & 38 all debris should be removed by using elevator #4. <input type="checkbox"/> When working in Building 2 use elevator #5 <input type="checkbox"/> Are Interim Life Safety Measures required? <u>When box is checked provide a copy of the ILSM with permit.</u> Provided by: _____ Date: _____																																																																																																																																																																																													
<input type="checkbox"/> Activity generates noise/vibration : <input type="checkbox"/> Yes, conduct Preconstruction Risk Assessment (PCRA) <input type="checkbox"/> No, No action required																																																																																																																																																																																													
Permit Requested by: _____				Date _____		Permit Authorized by: _____			Date _____																																																																																																																																																																																				
TB Risk Assessment: TB Risk Assessment completed. Based on most current IC Facility TB risk assessment, DPH community data and CDC data: _____ <input type="checkbox"/> Requirement for current TB skin test on construction workers is waived. <input type="checkbox"/> Baseline TB skin test must be completed on construction workers involved with this project. Documentation of a negative TB skin test within the two months prior to starting construction will be accepted.																																																																																																																																																																																													
Request for Extension of Original Permit/Trends Reason for Extension: _____ _____ <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 45%;">First Extension:</td> <td style="width: 20%;">Extended Date</td> <td style="width: 35%;">Trends:</td> </tr> <tr> <td>Second Extension:</td> <td>Extended Date</td> <td></td> </tr> <tr> <td>Third Extension:</td> <td>Extended Date</td> <td></td> </tr> </table>										First Extension:	Extended Date	Trends:	Second Extension:	Extended Date		Third Extension:	Extended Date																																																																																																																																																																												
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ATTACHMENT C

CONSTRUCTION Activity	DATE: CLASS:	DATE: CLASS:	DATE: CLASS:	DATE: CLASS:	DATE: CLASS:	DATE: CLASS:	DATE: CLASS:	DATE: CLASS:	Violation Correction And Date	Trends
Violations										
	YES	NO	YES	NO	YES	NO	YES	NO		
Air vents blocked off, seal or isolated										
Correct ICRA permit posted										
Barricades sealed-no penetrations										
Walk off mats in place, clean										
Door frames gaskets, doors closed										
Construction signs posted										
Adjacent ceiling areas intact										
Adjacent floor areas clean-no dust tracking										
All penetrations fire stopped										
Project area clean, debris removed daily										
Debris removed in correct containers										
Debris removed at time specified										
Negative pressure at entrance										
Windows & doors closed behind barricade										
Negative air machines running										
Negative air machines filter clean										

Negative air discharge hoses intact										
Safety precautions in use										
Fire extinguishers available										
Clear path to exits										
Noise/Vibration										
Slip/ Trip Hazards										

ATTACHMENT D

Pre-Construction Risk Assessment		
Location of Construction		Project Start Date:
Project Name		Project Number:
Project Coordinator:		Estimated Duration:
Description of project:		
Yes	No	NOISE
		Will there be noise generated that will impact a department adjacent to, above, or below the construction area?
		a. If so, these departments must be notified.
		b. How are you going to reduce the noise to an acceptable level? (See VA Specification 015719 "Temporary Environmental Controls")
Yes	No	VIBRATION
		Will there be vibration generated that will impact a department adjacent to, above, or below the construction area?
		a. If so, these departments must be notified each time this type of work will be performed.
		b. How are you going to reduce the vibration to an acceptable level?
Yes	No	ENVIRONMENTAL
		Are any of the following environmental hazards present?
		Will hazardous chemicals be used on this project? How will fumes and odors be controlled? <i>Material Safety Data Sheets (MSDS) are required.</i>
		Is asbestos abatement required on this job? <i>If so, notify Safety at the Pre-Construction Meeting.</i>
		Will there be hot work (welding, brazing, soldering) done on this project? If so, then a Hot Work Permit must be posted on the job site. All hot work must have a fire watch assigned to each area while the hot work is being performed.
		Will there be work performed above the ceiling? Will repair/construction activities involve penetration in to existing walls, ceilings, door frames, or doors? If so, must apply for an Above Ceiling Entry and Wall Construction Permit.
		Will confined space entry be required on this project? If so, the VAMC Confined Space Entry Program must be followed.
Yes	No	UTILITY OUTAGES
		Will any of the following systems be out of service at any time during the project?

		Fire alarm (<i>For outages greater than 1/2 hours, Interim Life Safety Measures must be implemented.</i>)
		Sprinkler (<i>For outages greater than 1/2hours, Interim Life Safety Measures must be implemented.</i>)
		Electrical
		Domestic water
		Oxygen
		Sewage
		HVAC
		Steam
		Medical Gas (indicate : Oxygen, Medical Air, Vacuum)
Yes	No	INTERIM LIFE SAFETY MEASURES
		Will there be any work that will require activation of the Interim Life Safety Measures (ILSM) during this project? Other work may require ILSM's, but typical work requiring ILSM implementation are:
		Any construction that impacts an exit or stairs,
		Any construction that impacts major breaches in a fire or smoke wall,
		Taking the main fire protection system out of service (sprinkler),
		Taking the main fire alarm system out of service,
		Taking the "area" fire or fire alarm systems out of service for more than 4 hours within a 24-hour period.
		Implementation of the ILSM requires a fire watch and the ILSM forms to be completed.
		Will construction affect exit routes from occupied areas adjacent to construction site?
		Will the project affect traffic patterns in area? <i>If yes, explain plan.</i>
		Will the project involve the deployment of a crane to deliver equipment over occupied facilities? • Must submit a <i>Lift Safety Plan</i> to the Safety Office for approval a minimum of 3 weeks prior to the arrival of the crane on Marion VA Hospital. Follow the Safety Office's <i>Lift Safety Plan</i> format and include the following information: crane specifications, crane inspection list, and crane staff training record/certification. Contractors shall maintain and present the following items prior to crane start (items can be kept in crane cab): crane certifications, crane registration, fire extinguisher, and crane operating and safety manual.
AIR QUALITY RISK ASSESSMENT <i>(Mold, Temperature, Humidity, Dust etc.)</i>		
Construction activity types are defined by the amount of dust that is generated, the duration of the activity, and the amount of shared HVAC systems. Contact Hospital's Safety and Infection Control Departments if any activity is questionable under these guidelines.		
Yes	No	Mold
		a. Air Sample. Sampling of the inside and outside air
		b. Surface Sample. Sampling the amount of mold spores deposited on indoor surface (swap, tape, and dust samples)

		c. Bulk Samples. The removal of materials from the contaminated areas to identify and determine the concentration of mold in the sample.
		TEMPERATURE
		a. Check A/C system. Difference in temperature that allow/cause condensation to occur.
		b. Keep indoor air temperature higher than 74 degrees will inhibit on mold growth.
		HUMIDITY
		a. Check the amount of humidity in the indoor environment (when humidity reaches high levels moisture is trapped).
		DUST
		a. Will dust be generated during this project? <i>If yes, initiate an Infection Control Risk Assessment(ICRA) to determine if an ICRA Permit is required</i>
		Dust caution sign posted?
		Construction Barrier in placed?
		Barriers sealed-no penetrations
		b. Will debris removal be necessary? <i>If yes, explain plan for debris removal and control.</i>
		c. Negative airflow ventilation and filtration in place and assessed for effectiveness
		d. Exhaust fans in-place and functioning
		c. Air supply duct to area closed and HEPA filtration unit in-place and functioning in adjacent patient care area?
		e. Will work be done in a sterile area? <i>If so, how will sterile atmosphere be maintained (to include access in/out of the work area)?</i>
INFECTION CONTROL RISK ASSESSMENT		
Yes	No	JOB SITE
		Will the job site be in a patient risk area? <i>If yes, determine the risk group and construction activity</i>
		Low Risk
		Medium Risk
		High Risk
		Highest Risk
Determine the type of construction activity		
		Type A: Inspection, non-invasive activity
		Type B: Small scale, short duration, moderate to high level of dust
		Type C: Activity generates moderate to high level of dust
		Type D: Major demolition and /or construction activities that generates high level of dust
		Will work be done in a sterile area? <i>If so, how will sterile atmosphere be maintained (to include access in/out of the work area)?</i>
		Construction infection control permit issued?

AUTHORIZING SIGNATURES:

Project Coordinator

Date

Safety

Date

Infection Control

Date

Comments: