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October 11, 2017

Ms. Laura Cooley  
National Center for Immunization and Respiratory Diseases  
Division of Bacterial Diseases  
Centers for Disease Control and Prevention  
1600 Clifton Road NE  
MS C25  
Atlanta, GA 30329

***Re: CDC-2017-0069, Centers for Disease Control and Prevention; Effective Methods for Implementing Water Management Programs (WMPs) To Reduce Growth of Transmission of Legionella spp.***

Dear Ms. Cooley:

The Association for Professionals in Infection Control and Epidemiology (APIC) wishes to thank the Centers for Disease Control and Prevention (CDC) for the opportunity to provide input into effective methods for implementing water management programs (WMPs). APIC is a nonprofit, multidisciplinary organization representing more than 15,000 infection preventionists (IPs) whose mission is to create a safer world through prevention of infection. We are pleased that the CDC seeks to understand the challenges and barriers institutions may face with implementation of WMPs. APIC supports implementation of water management programs aimed at reducing the risk of opportunistic waterborne pathogens. We are also encouraging our members and their healthcare facilities to respond to this RFI to help CDC better understand current practices and standards throughout the nation. The following comments are not facility specific, rather they address the collective concerns and challenges our members encounter.

**(2) Are there other standards or guidance for the prevention of *Legionella* growth and transmission that you would find useful but do not exist or are not currently available to you? If so, what information should those standards or guidance contain?**

It is not clear from current guidelines how institutions and healthcare professionals should be assessing risk for ambulatory care practices such as physician offices or specialty care centers. In addition, it would be helpful to have guidance on proper sampling methodology and when sampling is warranted. Specific guidance on sampling after a *Legionella* remediation event would also be helpful.

**(4) In your organization's experience, what are the principal barriers to implementation of WMPs by building owners and managers?**

Many healthcare networks lease sites for ambulatory services and may also contract out certain services off campus and therefore do not have access to drawings or oversight for implementing WMPs for those sites. Having concrete directives on what project managers and owners are required to provide in order



to assist in the prevention of *Legionella* and other waterborne pathogens would be helpful in driving accountability with building owners. A clear understanding of high-risk populations is something that is not well understood by project managers and site owners.

**(10) What additional considerations are relevant to developing guidance for preventing Legionnaires disease?**

APIC supports use of evidence-based guidelines and standards to develop and assist with implementation of water management programs based on risk to population served. The challenge lies in placing the burden on healthcare personnel to perform a crosswalk of guidelines from multiple sources such as ASHRAE, CDC, and individual state or local requirements. WMPs are designed to assess risk and put practices in place to prevent transmission, but it is difficult for healthcare facilities to be fully compliant with sometimes contradictory guideline requirements.

In conclusion, APIC appreciates the CDC's attention to the concerns raised by stakeholders regarding implementation of WMPs. APIC supports an approach of risk avoidance and monitoring of strategies to prevent *Legionella* and other waterborne pathogens. It will be helpful for guidance on testing parameters and sampling methodology to better understand when testing is warranted and how to properly collect samples and interpret findings. APIC also encourages the development and approval of novel rapid test methods for quantifying live *Legionella* in water samples for use by accredited laboratories. In addition, more precise guidance including specific steps to take after renovation or prior to opening new construction would be most helpful to our members.

Sincerely,

A handwritten signature in black ink that reads "Linda R. Greene".

Linda R. Greene, RN, MPS, CIC, FAPIC  
2017 APIC President