

Newly Released National Academies Report Provides Legionella Management Recommendations and Potential Policy Implications

Following a request by the U.S. Center for Disease Control and Prevention (CDC), the U.S. Department of Veterans Affairs (DVA), the U.S. Environmental Protection Agency (EPA), and the Alfred P. Sloan Foundation, the National Academies of Sciences, Engineering, and Medicine (NASEM) convened an expert committee (i.e., the Committee on Management of *Legionella* in Water Systems) to address and issue a report on the state of the science with regard to *Legionella*.

The NASEM report, which was released in 2019 and finalized in 2020, titled "Management of *Legionella* in Water Systems", organizes and addresses *Legionella* ecology, disease diagnosis, amplification within water systems, quantification, prevention and control, policy and guidance, and all associated research needs.



The finalized report provides recommendations to develop a more comprehensive policy for *Legionella* management in the United States, stating:

"There is a need for more uniform protection of public health from Legionella in hospitals and health care facilities, cooling towers, and building water systems across the country".

The recommendations provided in the finalized report include:

- Expand the CMS Memorandum to Require Monitoring for *Legionella* in Environmental Water Samples.
 - The <u>Centers for Medicare and Medicaid Services (CMS) memo</u> requires that hospital and long-term care facilities develop and implement water management plans (WMP). Routine monitoring programs would allow these institutions to assess and validate their WMP.
- Register and Monitor Cooling Towers
 - Legionella monitoring and registration of cooling towers has been shown to reduce cooling tower colonization in jurisdictions where they have been implemented (e.g., Quebec Cooling Tower Regulations, <u>Garland, TX</u>).



- Require Water Management Plans (WMP) for All Public Buildings
 - The standard of care specified for a WMP should be considered best management practice for all public buildings, including hotels, businesses, schools, apartments, and government buildings. <u>ASHRAE 188 (2018)</u>, the <u>CDC Toolkit</u>, credentialed, experienced, and licensed public health consultants (e.g., RHP Risk Management), and additional resources are available to assist in creating a WMP that can meet this requirement.
- Require a Temperature of 60°C (140°F) at Hot-Water Heaters and 55°C (131°F) at Distal Points.
 - Continuous monitoring of water temperatures within the hot-water system would be necessary to verify this requirement is being fulfilled.
- Require a Minimum Disinfectant Residual Throughout Public Water Systems and Concomitant Monitoring for Legionella
 - A minimum disinfectant residual throughout public water systems and validation of treatment with routine monitoring for *L. pneumophila* from sampling sites representative of the distribution system should be required.

In addition, the report stresses the importance of developing guidelines for interpretation of *Legionella* monitoring data using a risk-based framework and training and educating those in relevant disciplines and occupations who are responsible for the safety of water systems on legionellosis and the prevention and control of *Legionella* amplification in water systems.

As building owners, facility managers, scientists, legal counsel, and consultants, it is important to remain informed and aware of new research, recommendations, regulations, and potential policy implications of topics pertaining to our businesses. Being aware of the aforementioned policy recommendations will leave you and your business better prepared for any regulatory changes.

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At RHP Risk Management, we focus on helping our clients navigate the uncertainties associated with environmental and occupational hazards and risks. Our staff of public health professionals are experienced and trained in recognizing, anticipating and controlling hazards and are experts in the development of water management programs and water testing to reduce the risks of building-related Legionellosis.

For more information on RHP's Legionella services and contact information, please visit <u>https://rhprisk.com/legionella/</u>