



Do I need
an ICRA?

Small Jobs, Big Risks: Infection Prevention Leading ICRA Oversight



DISCLAIMER

SMALL JOBS. **BIG RISKS.** REAL RESPONSIBILITY.

The guidelines and instructions presented here are not meant to supersede manufacturers' instructions, contractors' job site requirements, or healthcare facilities' policies or procedures nor are they meant to replace any current local, state, provincial, or federal safety rules or regulations.



It is essential that you always follow all current local, state, provincial, or federal safety rules, regulations, and guidelines whenever you perform any of these tasks.



No statements made in this presentation should give the impression that Carpenters Training Institute their affiliates, representatives, or employees have assumed any part of the employer's legal responsibility to provide a
“safe and healthful workplace,”
as mandated by the Occupational Safety and Health Act of 1970.



**SMALL JOBS.
BIG RISKS.**



Follow the Rules.



Protect Patients.



Protect Each Other.



Own the Risk.
Do It Right.

Objectives



Identify infection risks
from routine
maintenance work



Apply the ICRA Process
to small jobs from an
IP perspective



Implement oversight
strategies to ensure
compliance and
protect patients

But ICRA is just for Construction and Renovation...

CMS Condition of Participation



Hospital Infection Control Worksheet

Cite: 42 CFR 482.42(a)



1.A.6 The hospital has infection control policies and procedures relevant to construction, renovation, maintenance, demolition, and repair, including the **requirement for an infection control risk assessment (ICRA)** to define the scope of the project and need for barrier measures before a project gets underway.

Why Small Jobs Are Not “Low Risk”

Task Type	Routine Examples	Primary Infection Risk	ICRA Trigger	Typical Controls
 Ceilings / Above-Ceiling	• Ceiling tile replacement • Cable pulls • Inspections	Dust, fungal spores, hidden airflow pathways	Above-ceiling access in occupied areas	• Barriers • HEPA vacuum • Surface cleaning
 Plumbing	• Sink repair • Pipe access • Drain work	Aerosolized waterborne pathogens, biofilm	Work near patient sinks or immunocompromised patients	• Splash control • Cleaning • PPE
 Walls / Penetrations	• Drilling • Mounting equipment • Wall openings	Dust release, contamination pathways	Penetration into patient-adjacent spaces	• Dust control • Barriers • Cleaning
 HVAC / Airflow	• Vent removal • Filter changes • Diffuser adjustment	Altered pressure, airborne spread	Any change to airflow in patient areas	• Coordination with Facilities • Airflow verification
 Electrical / Low Voltage	• Outlet replacement • Data drops • Alarm wiring	Dust from drilling or ceiling access	“Quick” jobs in patient care areas	• Spot containment • HEPA vacuum
 Flooring / Surfaces	• Tile replacement • Grinding • Carpet removal	Dust, debris, surface contamination	Work while space is occupied	• Containment • Off-hour scheduling
 Doors / Casework	• Door frames • Cabinets • Handrails	Dust, high-touch contamination	Corridor or patient room work	• Barriers • Cleaning • Hand hygiene

When Should a Job Trigger ICRA?

- Any work that:
 - Disturbs dust or surfaces near patient areas
 - Impacts airflow or ventilation
 - Water work
 - Is adjacent to immunocompromised patients
- IP intervention is necessary even for those minor jobs



ICRA Refresher for Oversight

ICRA Infection Control Risk Assessment

1. Identify patient risk group
2. Identify project type
3. Determine project classification (I-IV or I-V if using ICRA 2.0)
4. Assess surrounding areas
5. Specify controls
6. Document and validate



— The Construction Control Roadmap —



- Work order created
- Scope defined
- Location confirmed



- Contamination risk evaluated
- Controls determined
- Occupancy impact reviewed



- Controls verified
- Documentation complete
- Leadership sign-off



- Barrier checks
- Air quality verification
- Behavioral compliance
- Documentation updates



Establishing Infection Prevention's Role in "Small Jobs"

- Encourage the establishment of a process
 - Identify authority
 - Assess risk early
 - Classify work correctly (ICRA)
 - Recommend mitigation strategies
 - Monitor compliance
 - Provide training
 - Ensure access

Compliance Gap

- ⚠ Work starts without IP notification
- ⚠ Incomplete or incorrect ICRA
- ⚠ Barriers not installed or improperly used
- ⚠ No HEPA vacuum or dust control
- ⚠ HVAC adjustments without coordination
- ⚠ Work performed during patient occupancy
- ⚠ Lack of post-work cleaning
- ⚠ No post-work inspection
- ⚠ Poor documentation
- ⚠ Maintenance staff unaware of ICRA expectations

IP Risk Mitigation Strategy

- ✓ Require IP notification before any work impacting patient space or airflow
- ✓ Review and validate ICRA classification before approval
- ✓ Verify barrier setup prior to work and during spot checks
- ✓ Require HEPA vacuum use for all dust-generating tasks
- Coordinate airflow changes with facilities and IP
- ✓ Schedule work during low census or off-hours when possible
- ✓ Require terminal or enhanced cleaning before space reopens
- ✓ Conduct IP sign-off before returning space to use
- ✓ Standardize documentation and retain ICRA records
- ✓ Ongoing education and quick-reference guidance

Oversight Strategies for ALL Jobs- Big and Small

1. Policies and Governance

- Infection control policies that address construction, renovation, demolition, repair, and maintenance
- Policies require ICRA before work begins
- IP role and authority in ICRA review is clearly defined

2. ICRA Process

- ICRA required for **all work** that impacts patient areas, airflow, or water regardless of scope
- ICRA completed prior to work
- IP review and approves ICRA



Oversight Strategies for ALL Jobs- Big and Small

3. Risk Controls and Implementation

- Standardize barrier selection based on ICRA classification
- Implement dust control measures
- HVAC/Airflow changes coordinated with IP and Facilities
- PPE defined and verified

4. Monitoring and Oversight

- Address responsibility, frequency, and record-keeping for rounding or spot checks
- How will non-compliance be addressed?
- How will breached controls be addressed?



Oversight Strategies for ALL Jobs- Big and Small

5. Post-Work Verification

- Terminal clean completed per policy
- Barriers removed safely
- Airflow restored and verified
- Final sign off by IP

6. Documentation and Records

- Retain ICRA records, monitoring, and audits
- Post-work approval documented
- Ensure easy retrieval of documents



Oversight Strategies for ALL Jobs- Big and Small

7. Staff Education & Competency

- ICRA training
- Quick reference tools

8. Preparation Questions

- How do you know an ICRA is completed before work begins?
- How are small maintenance tasks identified for IP review?
- Who monitors compliance during the work?
- How do you verify the area is safe before reopening?



QUESTIONS?

**WE'RE HERE TO HELP
BUILDING SAFER SPACES TOGETHER!**



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