ASHRAE 188 Legionella Water Management Plan Requirements for Healthcare Facilities

THE DIRECT ANSWER

ASHRAE 188 is the national standard that requires building owners to control Legionella risk in water systems through a formal, written water management plan. It doesn't prescribe exact temperatures or chemical levels — it requires you to identify your risks, set your own control limits, monitor them, and document everything.

WHAT ASHRAE 188 REQUIRES

- ANSI/ASHRAE Standard 188-2021 establishes minimum legionellosis risk management requirements for the design, construction, commissioning, operation, maintenance, repair, and expansion of building water systems — both potable and non-potable.

WHO NEEDS A WATER MANAGEMENT PLAN

- Healthcare facilities with inpatient beds, transplant units, oncology, or ICUs
- Buildings with cooling towers, decorative fountains, or other aerosol-generating devices
- Central hot-water systems serving multiple housing units
- Buildings over 10 stories
- Facilities housing immunocompromised occupants

FIELD QUESTION

Does CMS require ASHRAE 188 specifically?

CMS S&C 17-30 requires Medicare-certified facilities to have water management policies and procedures, and directs them to consider ASHRAE 188 and the CDC toolkit as the framework. You won't be cited for "not owning a copy of Standard 188" — you'll be cited for not having an effective program, and 188 is the yardstick surveyors measure it against.

From Healthcare Facility Hub - free, like everything on the site. The full article is at the link below.

Caution: codes, editions, and targets vary by facility and authority having jurisdiction (AHJ). Figures marked as common practice are facility targets, not code requirements. Confirm against your AHJ and the current code text before acting.