FIELD SHEET | FGI IN OCCUPIED RENOVATIONS

Phased Compliance, Equivalency, and ICRA/ILSM Coordination

Practical execution workflow for applying FGI Guidelines inside occupied hospital renovations without survey or containment failures.

1. Occupied Renovation Scope & Equivalency Logic

Renovation Decision Point	New Construction Baseline	Occupied Renovation Reality	Required Documentation
Project Boundary	Full-building compliance under governing FGI edition.	Applies to altered/renovated footprint; untouched adjacent zones stay under existing-conditions baseline unless life-safety/egress impacted.	Phased scope boundary drawing + Functional Program
Physical / MEP Constraints	Unconstrained clearances, ceiling heights, and shaft routing.	Existing columns, slab-to-slab heights, or risers may block literal dimensional compliance.	Written AHJ equivalency / variance request with compensatory controls
Ventilation & Pressure	Full ASHRAE 170 Table 7-1/8-1 design airflows at turnover.	Adjacent clinical units remain occupied; temporary negative/positive containment must hold continuously.	Temporary HVAC balance log + differential pressure log
Surveyor Scrutiny	Final occupancy inspection prior to patient admission.	Active CMS CoP / TJC LS.01.02.01 & IC.02.02.01 surveys occur mid-construction.	Live PCRA binder (ICRA + ILSM + Security + Utility)

2. Integrated Four-Track Phased Compliance Matrix

Track	Governing Framework	Occupied-Phase Control	Failure / Stop-Work Trigger
1. FGI PCRA & Functional Program	Governing state FGI edition	Define affected patient populations, noise/vibration limits, and phase boundaries.	Scope creep outside permitted phase boundary.
2. Infection Control (ICRA)	ASHE ICRA 2.0 / CDC EICG	Hard/soft barriers per Class; >= -0.01 in. w.g. (-2.5 Pa) negative pressure; HEPA exhaust.	Barrier breach, pressure loss, or dust migration.
3. Life Safety (ILSM)	TJC LS.01.02.01 / NFPA 101 / 241	Maintain egress widths, exit signage, fire-rated temporary partitions, and fire-watch.	Blocked egress, impaired sprinkler/alarm without ILSM.
4. Utility & Water Safety	ASHRAE 170 / 188 / CMS QSO-17-30	Isolate shutdowns, flush dead-legs weekly, verify AII/OR pressure before re-occupancy.	Unplanned utility outage or uncommissioned air/water.

3. Four-Gate Occupied Renovation Sign-Off Checklist

Gate	Timing	Mandatory Sign-Off Items	Sign-Off Authority
Gate 1: Pre-Design & PCRA	Before permit / bid	[ ] Confirm governing state FGI edition; [ ] Draft Functional Program; [ ] Submit AHJ equivalency requests for existing-condition constraints.	Facility Director + Architect + AHJ
Gate 2: Pre-Demolition Barrier	Before demo in each phase	[ ] Inspect hard/fire-rated barrier seals; [ ] Verify >= -0.01 in. w.g. pressure differential; [ ] Post ICRA permit & ILSM notice.	Infection Prevention + Safety Officer
Gate 3: Active Phase Monitoring	Daily / shift-level	[ ] Log continuous/daily differential pressure; [ ] Audit egress & fire-watch logs; [ ] Execute weekly water flushing on capped lines.	Construction PM + Facility Ops
Gate 4: Phase Recommissioning	Prior to patient return	[ ] Terminal clean & particle/air verification; [ ] TAB report confirming ASHRAE 170 ACH & pressure; [ ] Close ILSM & update life-safety drawings.	IP + Commissioning Agent + Ops

4. AHJ Equivalency & Variance Package Essentials

- **State the exact constraint:** Document why literal compliance is structurally or clinically infeasible in the existing footprint (dimensions, structural columns, riser paths).
- **Propose equivalent safeguards:** Detail operational, clinical, or engineering compensations (e.g., dedicated equipment alcoves, enhanced air changes, or workflow separation).
- **Secure written approval pre-demo:** Never assume verbal field inspector agreement protects against a CMS or TJC survey citation.

Clinical & Regulatory Spot-Check Caveat: This field sheet is a practitioner prep/reference tool synthesized from public regulatory frameworks (FGI, ASHE ICRA 2.0, TJC LS.01.02.01, ASHRAE 170, CMS). It does not reproduce licensed FGI text. Confirm all project-specific equivalencies and phase plans with your AHJ.