



WISCONSIN DEPARTMENT
of HEALTH SERVICES

Water Management Programs

Observations from *Legionella*
Public Health Facility Investigations

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Bureau of Communicable Diseases
Division of Public Health

Goals for Today

- Review background information about Legionnaires' *Legionella* growth and spread.
- Review the key elements of an industry-standard Water Management Program (WMP).
- Discuss examples of water management deficiencies from public health investigations.

What Will Not Happen Today

This is **not** a comprehensive discussion of all items that may be important for a facility's WMP.

Background and Transmission

Legionnaires' Disease: Background



- Atypical pneumonia caused by *Legionella* bacteria.
- Grows and spreads in building water systems and devices.
- Cases and outbreaks can be challenging to detect and investigate.

Legionella Bacteria: Growth Conditions

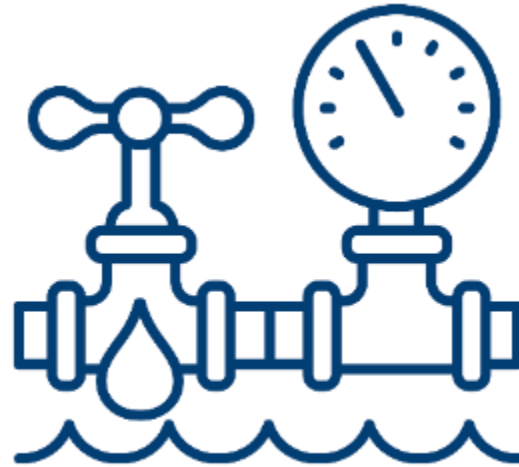


Legionella naturally occur in fresh water.

Legionella Bacteria: Growth Conditions



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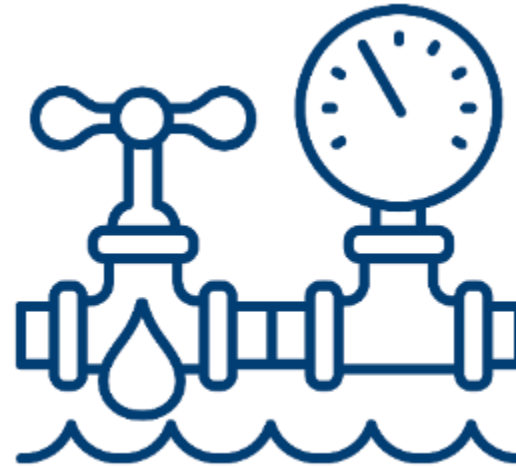


Public water systems or private wells deliver incoming water to buildings.

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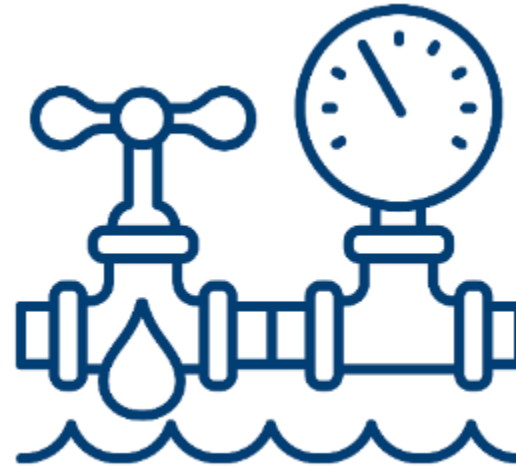


Water is delivered to fixtures and devices for use.

Legionella Bacteria: Growth Conditions



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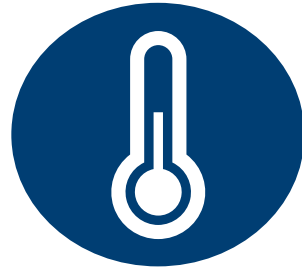


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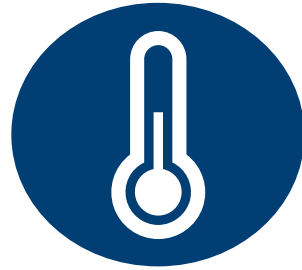
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Legionella Bacteria: Growth Conditions



Legionella grow and amplify in water **77°F** to **113°F**.

Legionella Bacteria: Growth Conditions

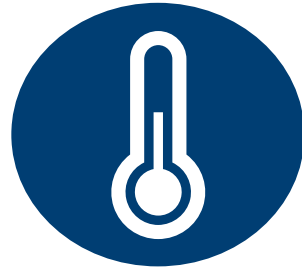


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Stagnation and **biofilm** formation contribute to *Legionella* growth.

Legionella Bacteria: Growth Conditions



Legionella grow and amplify in water **77°F** to **113°F**.



Stagnation and **biofilm** formation contribute to *Legionella* growth.



Legionella is transmitted by **inhalation** or **aspiration** of contaminated water.

Examples of Exposure Sources



Showers and
faucets



Hot tubs



Cooling towers



Devices

Diagnostic Testing

Confirmatory Diagnostic Testing



Urine antigen
test (UAT)

This test **only** detects
Legionella pneumophila
serogroup 1.

Confirmatory Diagnostic Testing



Urine antigen
test (UAT)



PCR



Culture

These tests must be resulted
from **sputum** or **lower
respiratory specimens.**

Diagnostic Testing: *Legionella* Culture



A note on culture: *Legionella* does not grow on routine respiratory cultures. It must be specifically ordered.

Benefits of *Legionella* PCR Testing



PCR testing can:

- Inform appropriate treatment.
- Identify cases and outbreaks that will be missed when using urine antigen tests.

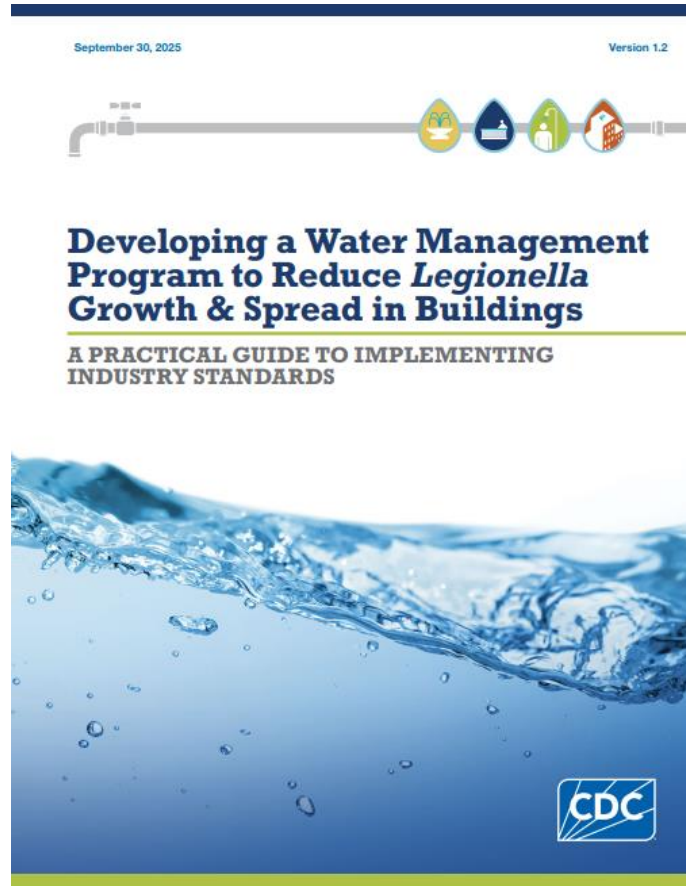
Water Management Programs

What is a WMP?



The risk management plan for the **prevention and control of legionellosis** associated with building water systems, including documentation of the plan's implementation and operation (ASHRAE 188-2021).

Free Resources for Developing WMPs

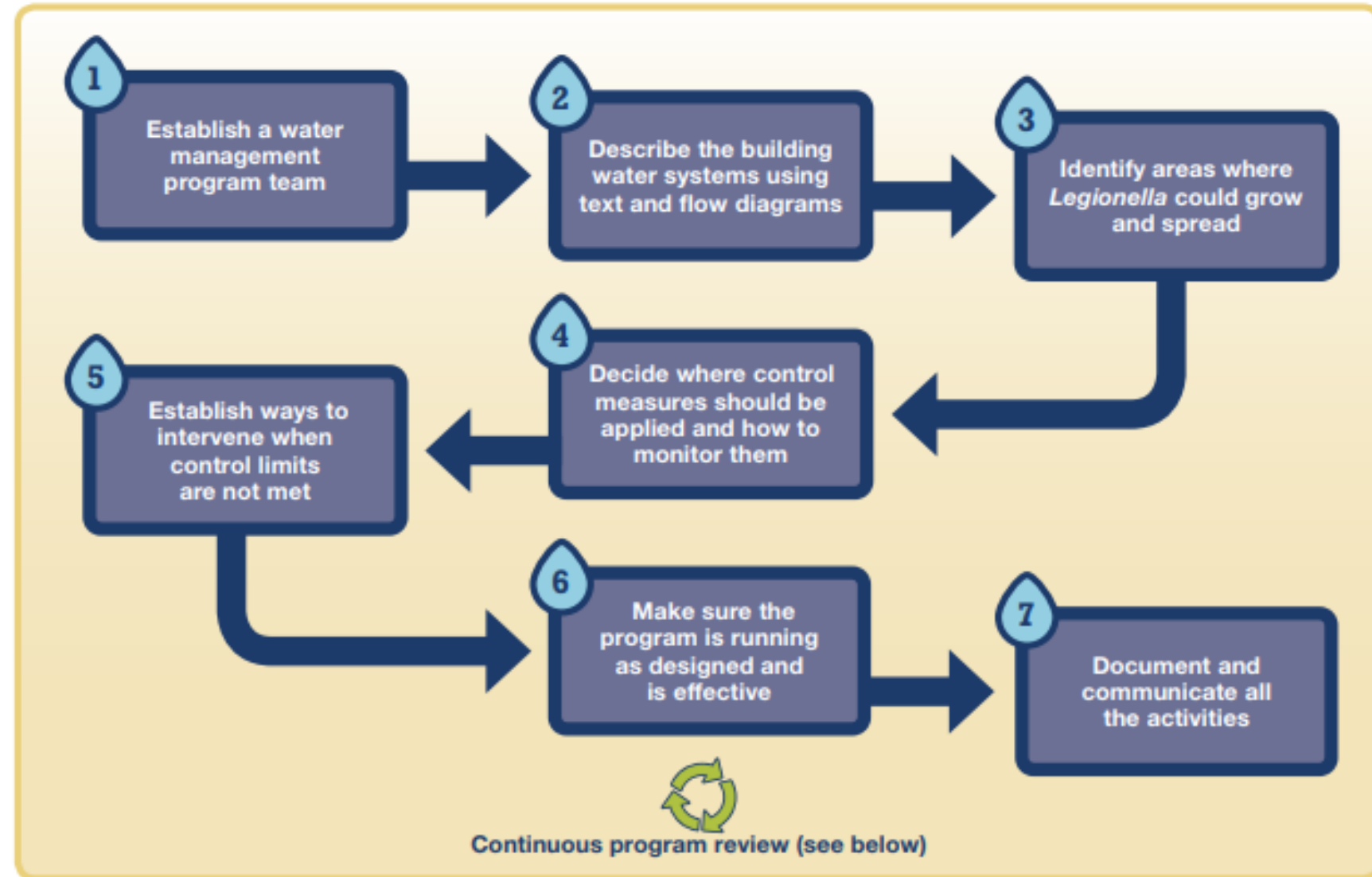


[Developing a Water Management Program to Reduce Legionella Growth & Spread In Buildings: A Practical Guide to Implementing Industry Standards](#)

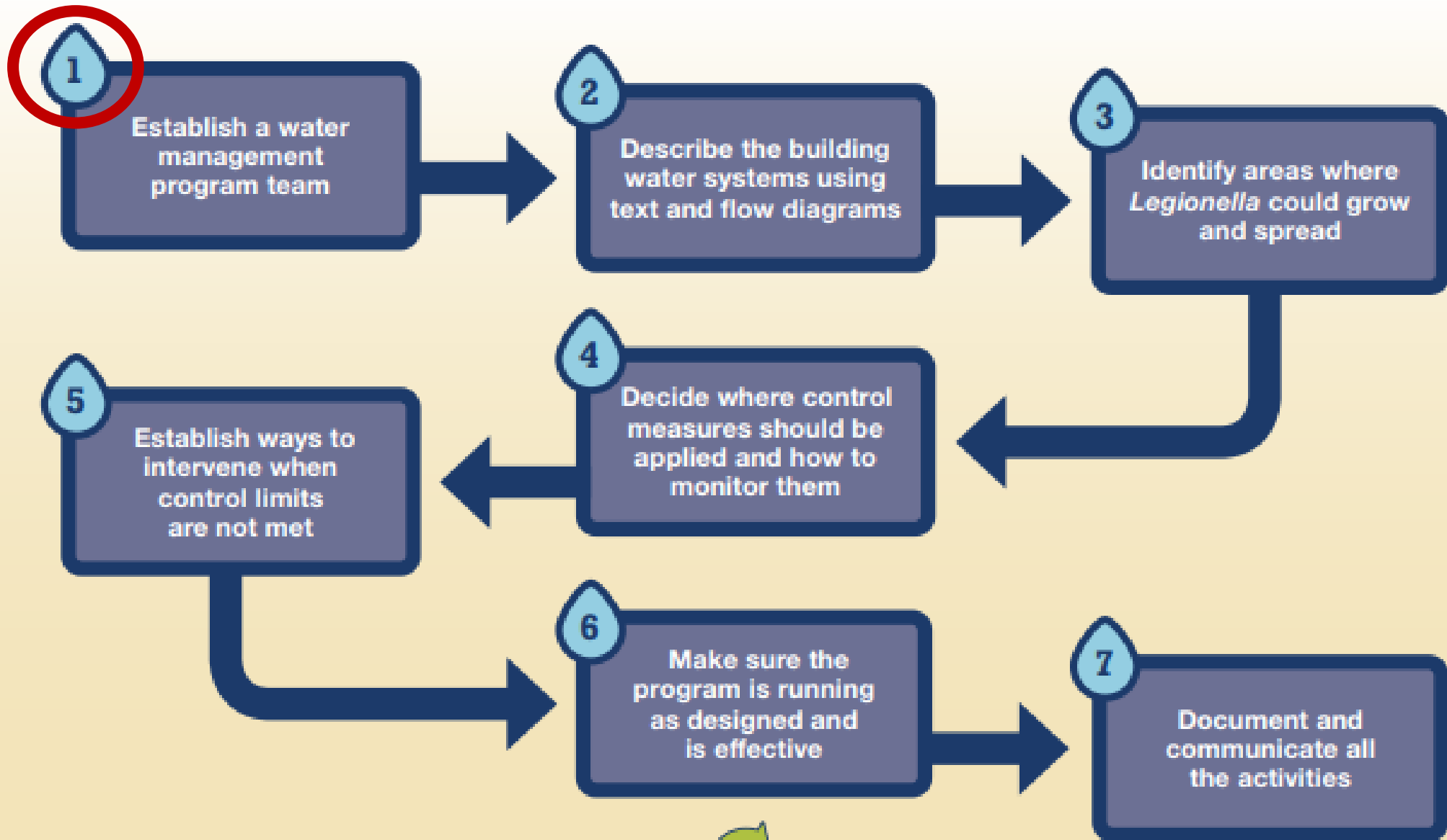


[Legionella WPM EvalTool FINA.pdf](#)

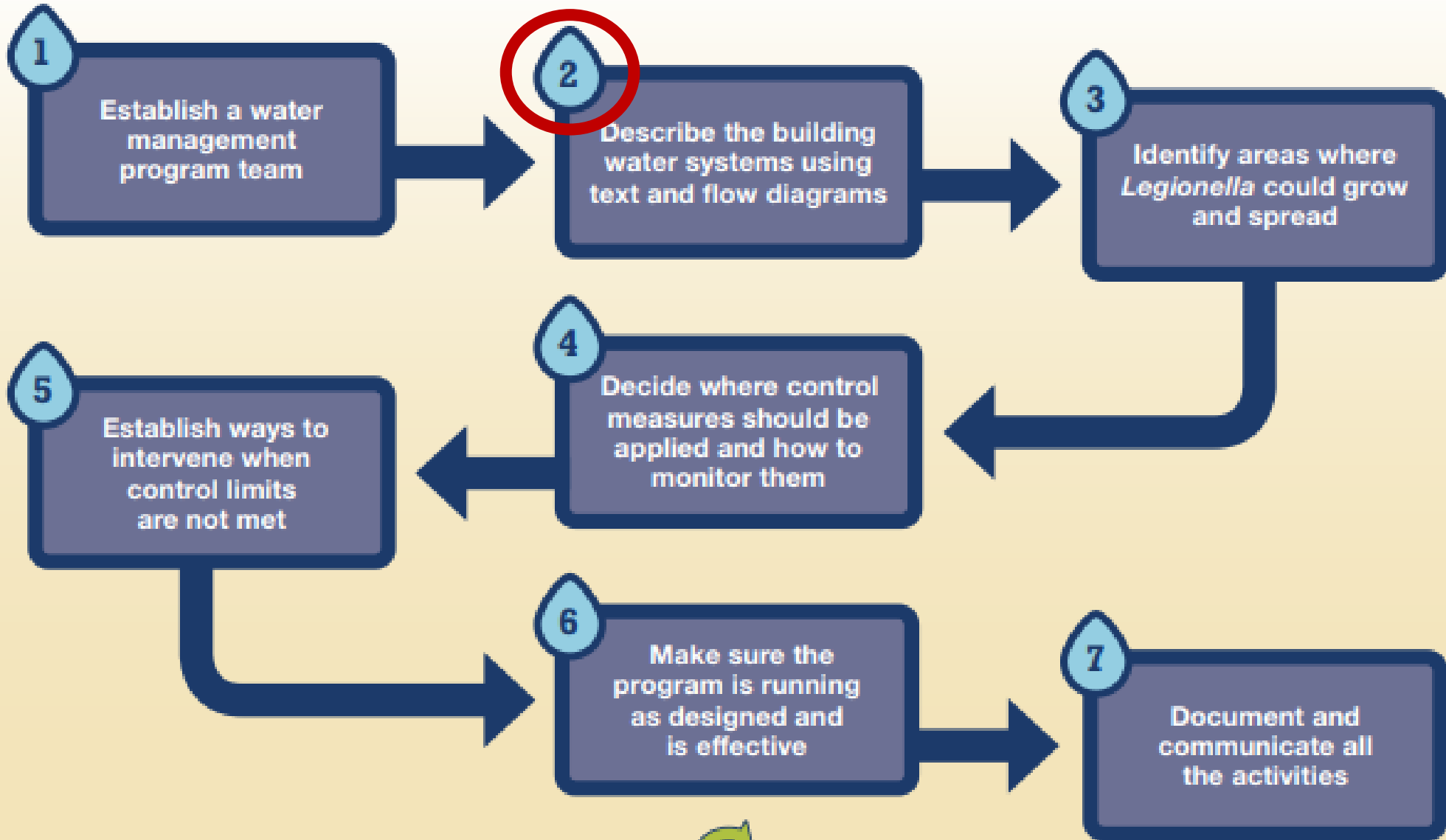
Elements of a WMP



[Developing a Water Management Program to Reduce Legionella Growth & Spread In Buildings: A Practical Guide to Implementing Industry Standards](#)



Continuous program review (see below)



Continuous program review (see below)

Frequently Encountered Issues with Water System Descriptions



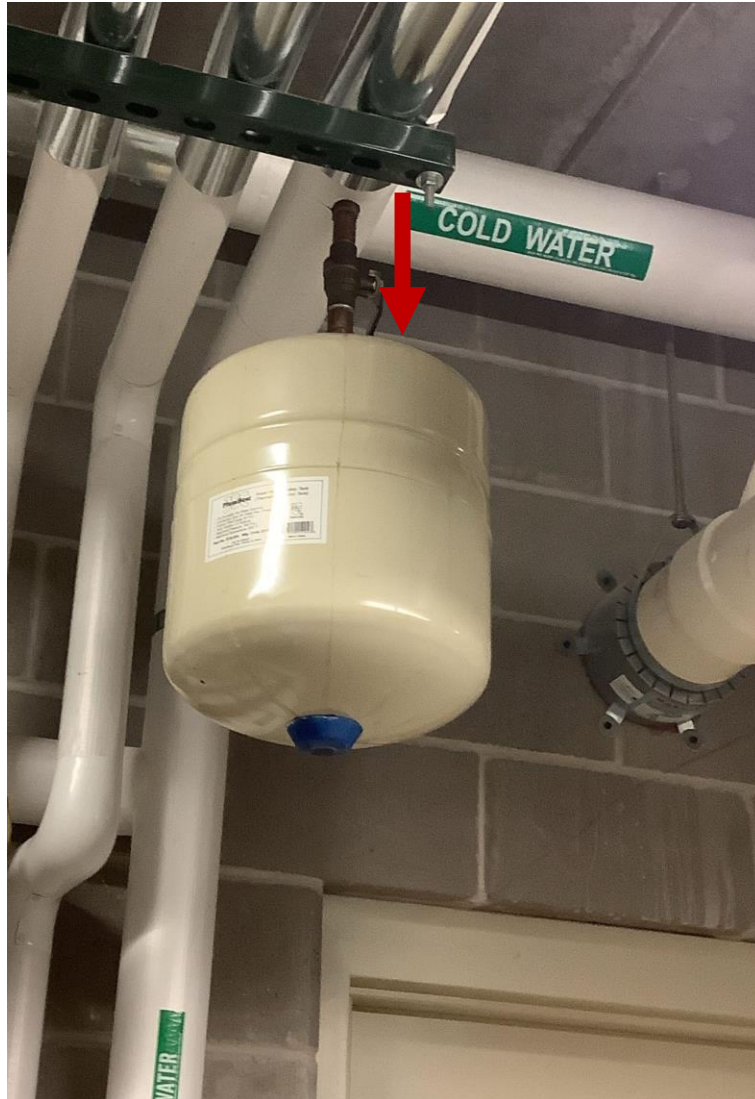
- The written or flow diagram are missing entirely.
- Important components of the building water system are missing.
- There are inaccurate details.

Frequently Encountered Issues with Water System Descriptions

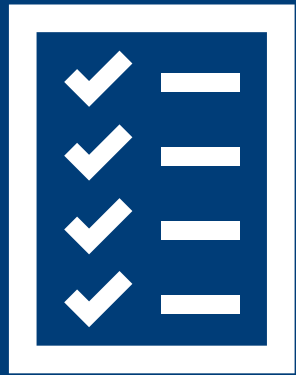


- The written or flow diagram are missing entirely.
- **Important components of the building water system are missing.**
- There are inaccurate details.

Example of Building Water System Component Often Missing in WMPs



Frequently Encountered Issues with Water System Descriptions



- The written or flow diagram are missing entirely.
- Important components of the building water system are missing.
- **There are inaccurate details.**

Case Study: Water System Description



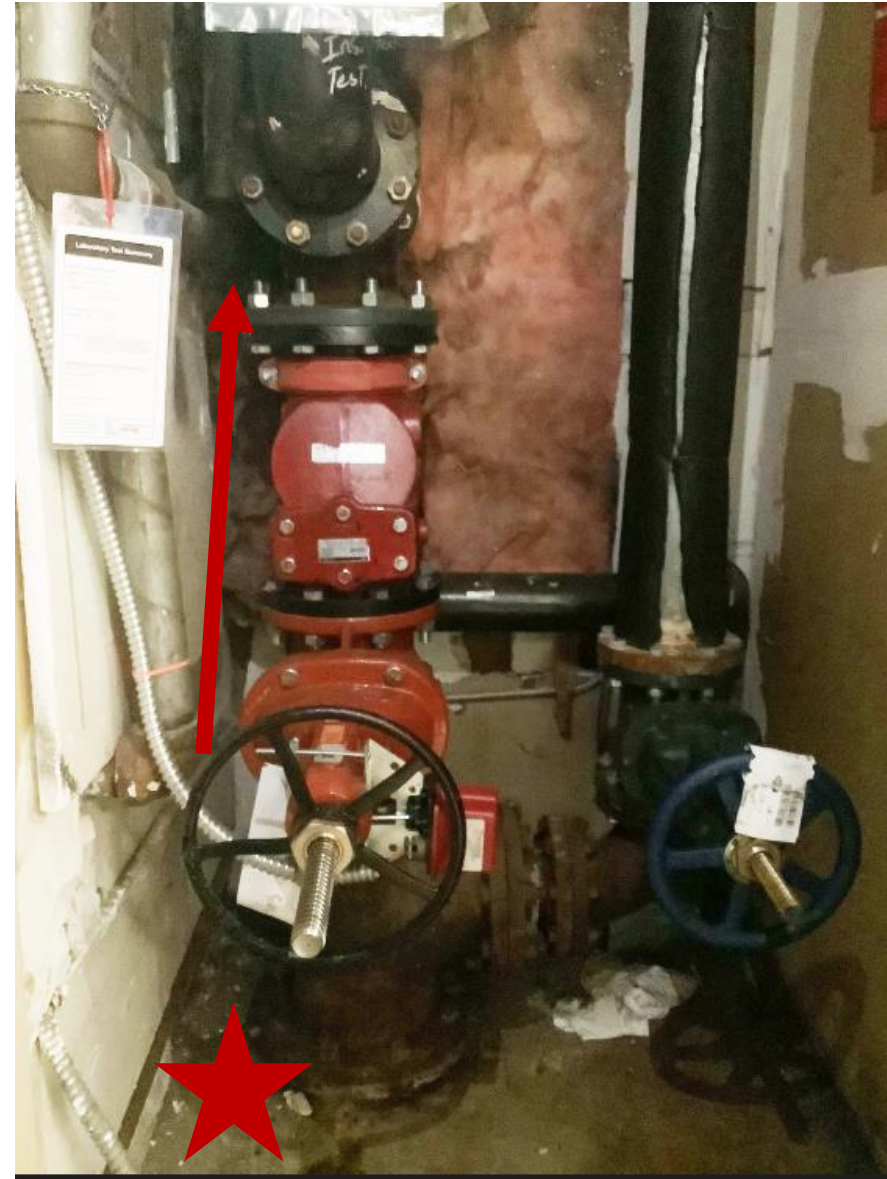
Case Study: Water System Description



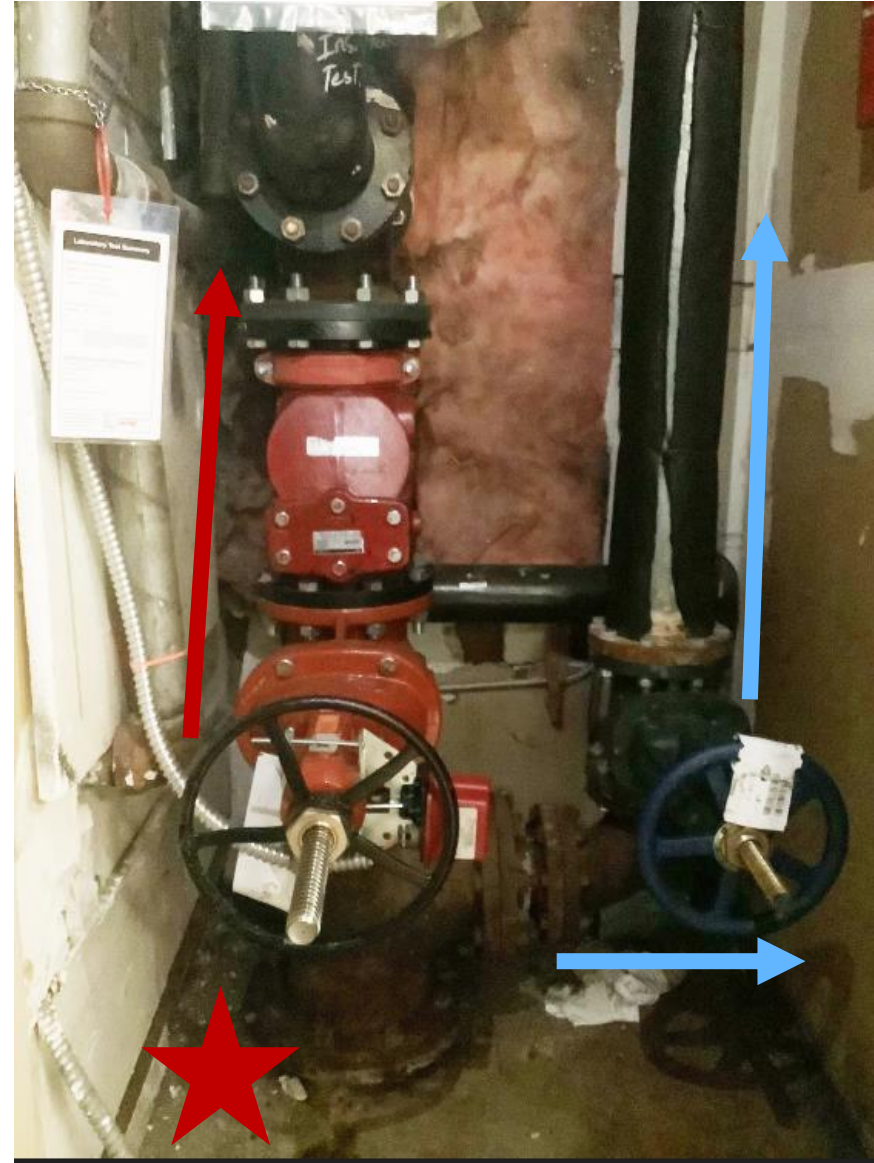
Case Study: Water System Description

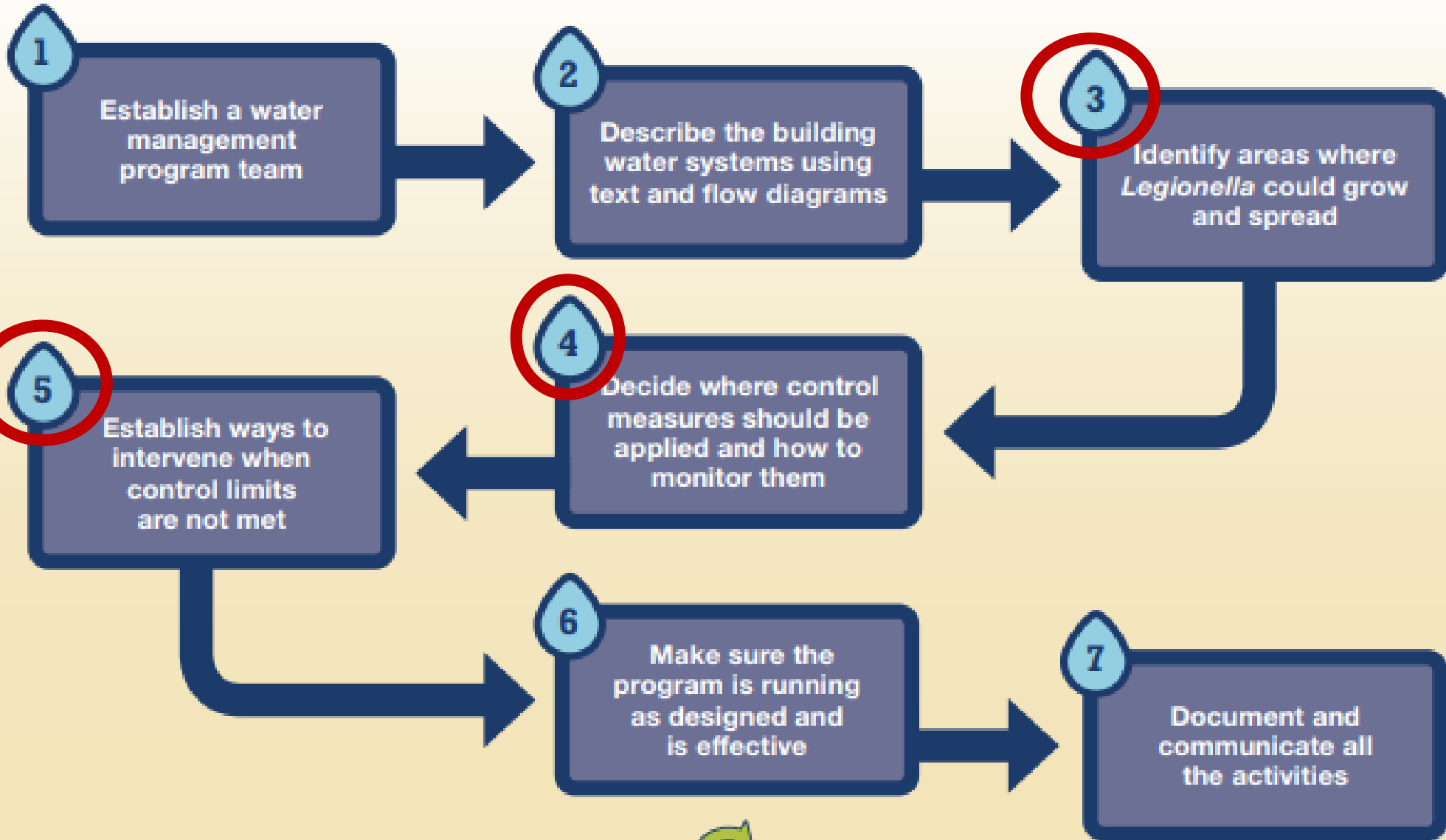


Case Study: Water System Description



Case Study: Water System Description





Continuous program review (see below)

Examples of Helpful Parameters to Monitor



Physical condition of components

Examples of Helpful Parameters to Monitor



Physical condition of components



Temperatures

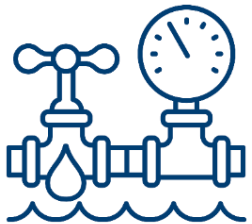
Examples of Helpful Parameters to Monitor



Physical condition of components

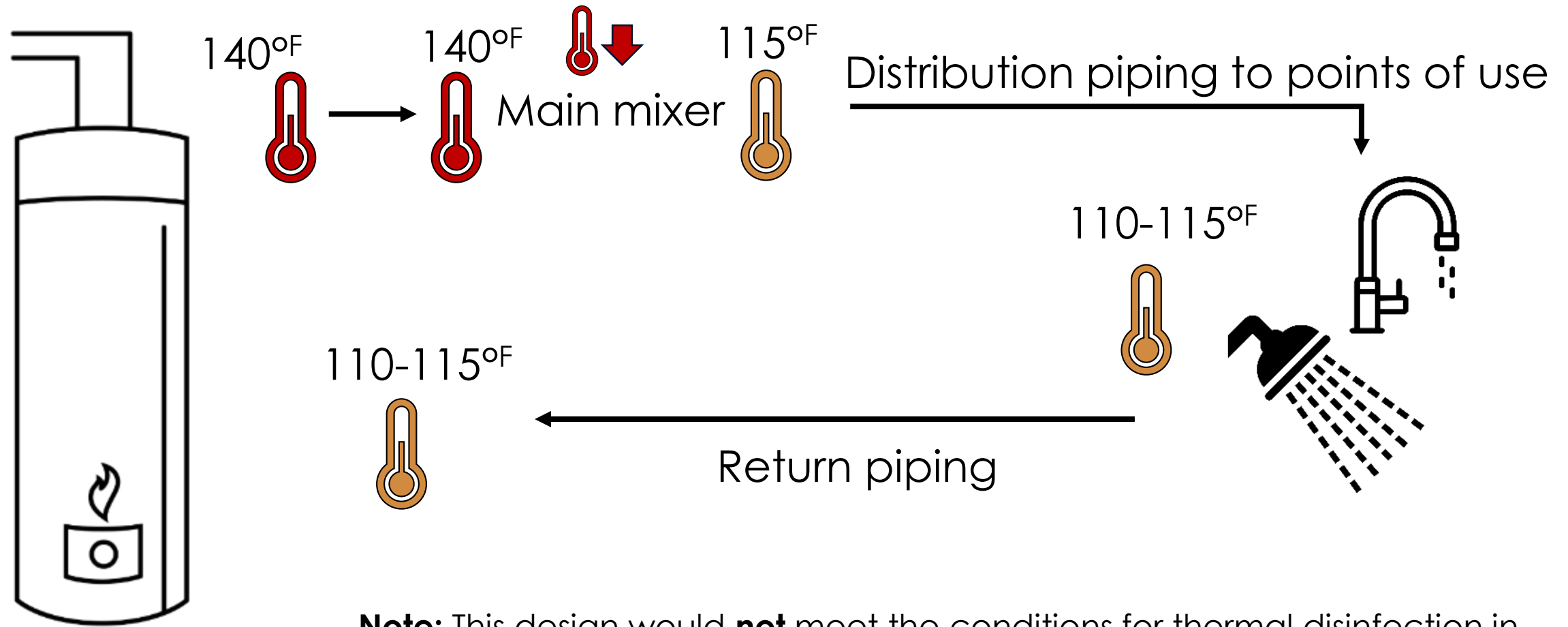


Temperatures



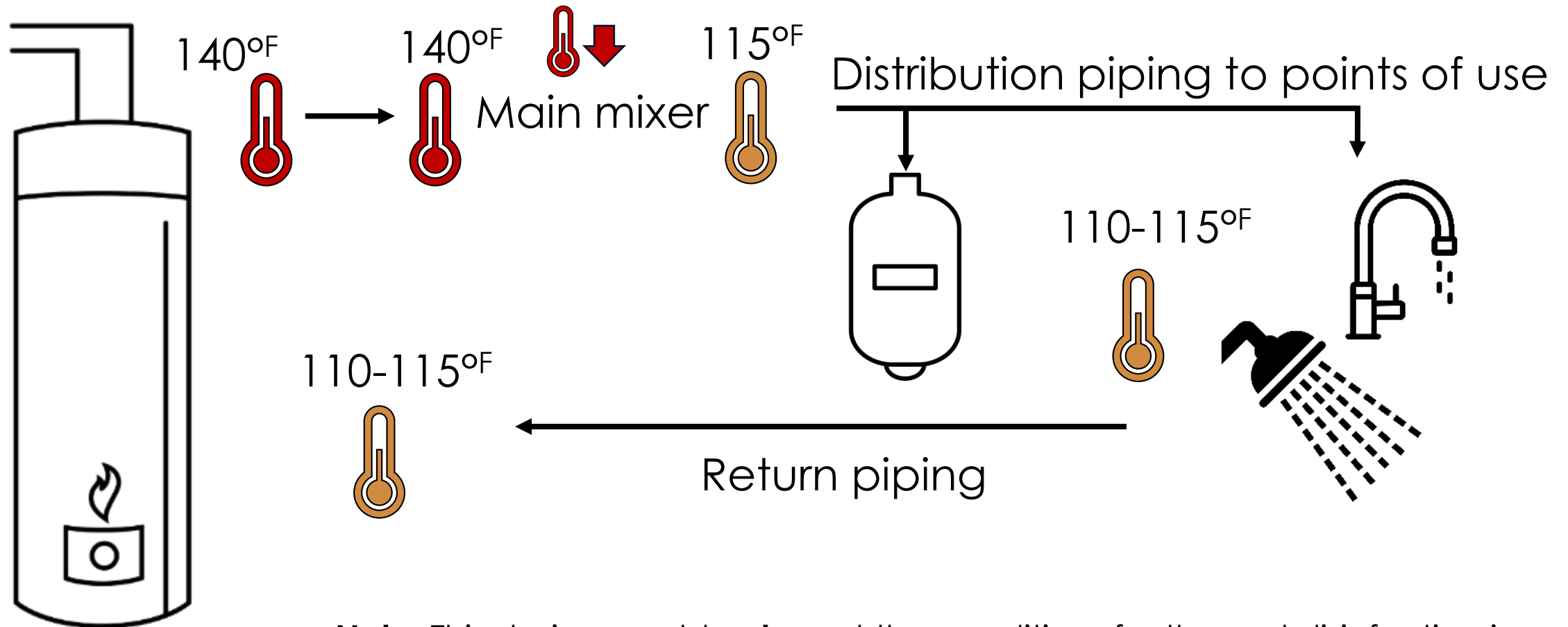
Disinfectant residuals and pH

Example of Common Hot Water System Configuration in Health Care Facilities



Note: This design would **not** meet the conditions for thermal disinfection in health care and related facilities (SPS 382.50(3)(b)6.) for buildings constructed after May 1st, 2003.

Example of Common Hot Water System Configuration in Health Care Facilities



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Case Study Break

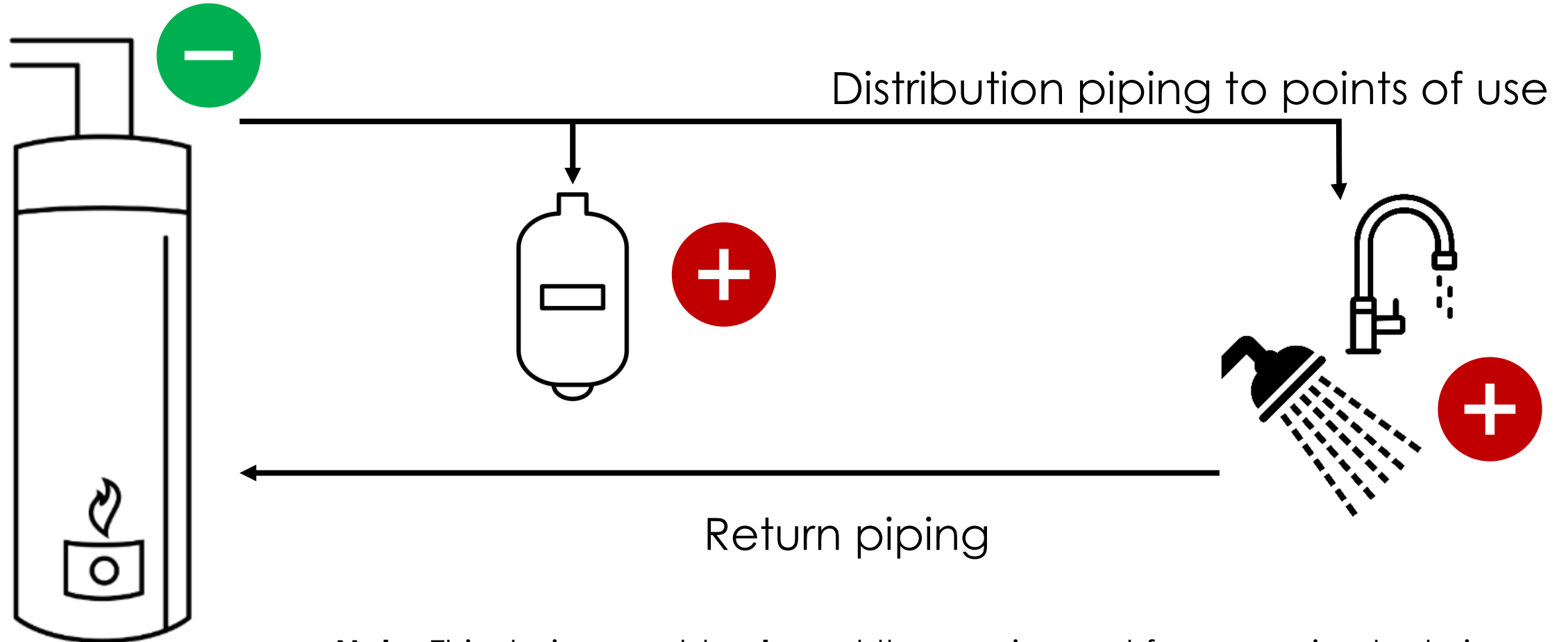
Case Study: Value in Monitoring Disinfectant Residuals



Case Study: Value in Monitoring Disinfectant Residuals

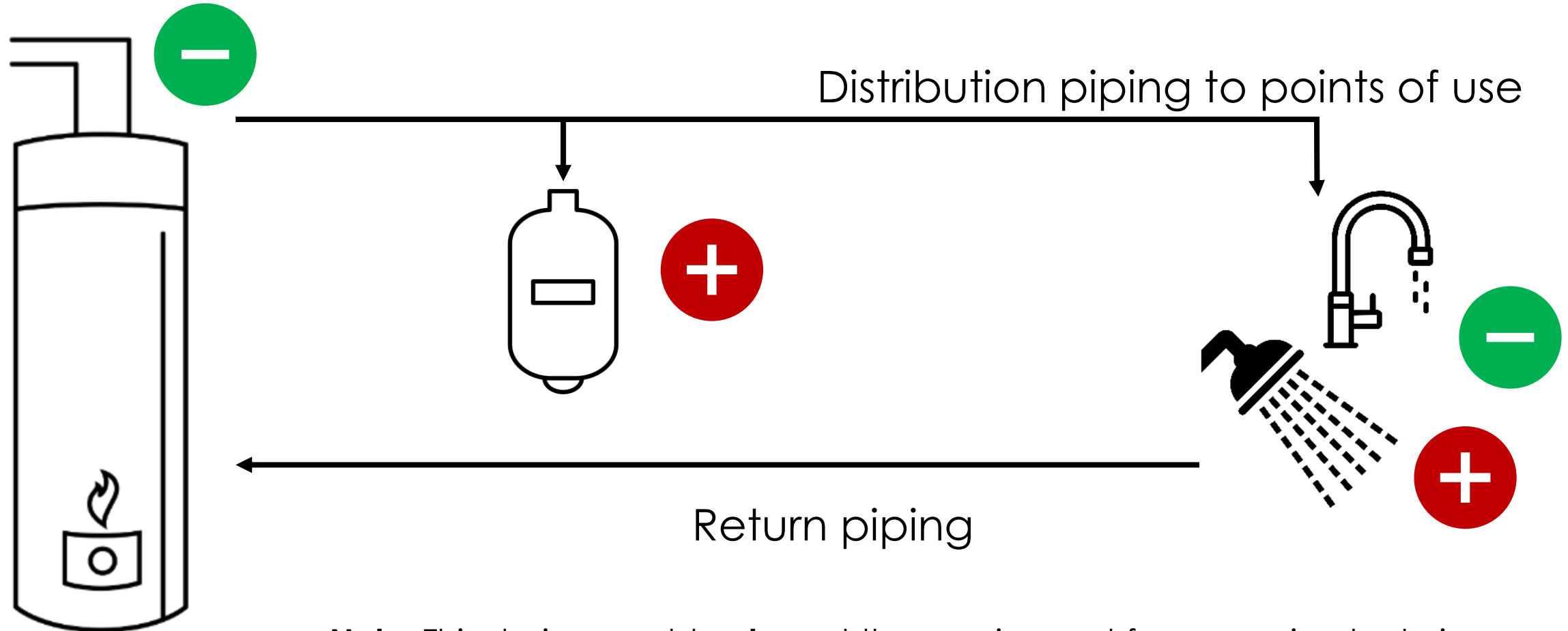


Case Study: Importance of Appropriate Corrective Actions



Note: This design would **not** meet the requirement for expansion tanks in health care and related facilities ([SPS 382.50\(3\)\(b\)14.](#)) for buildings constructed after October 2023.

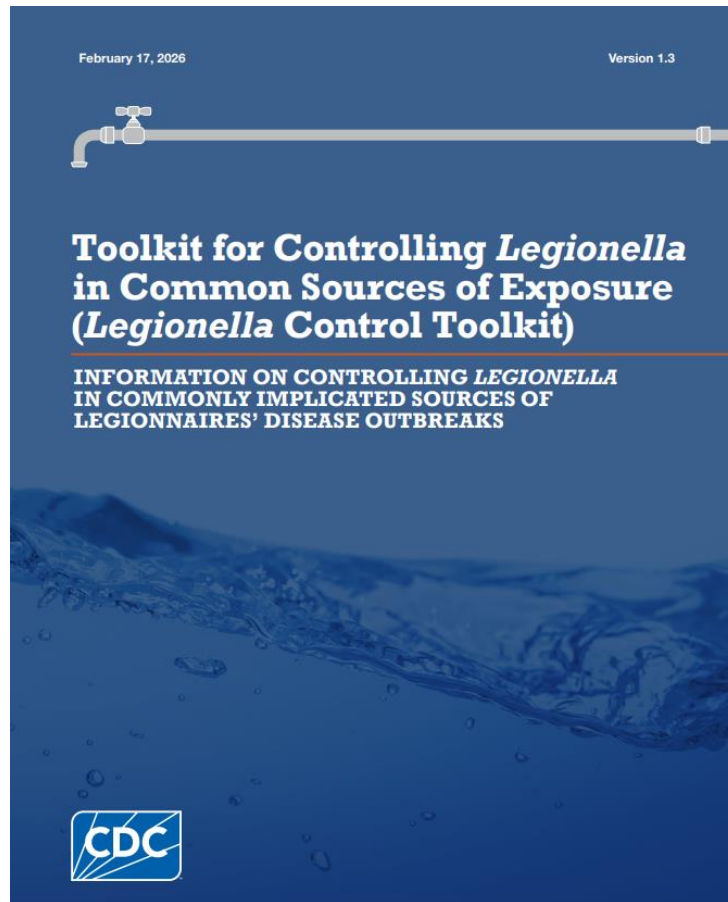
Case Study: After Hyperchlorination



Note: This design would **not** meet the requirement for expansion tanks in health care and related facilities (SPS 382.50(3)(b)14.) for buildings constructed after October 2023.

Free Resources for *Legionella* Risk Assessment and Remediation

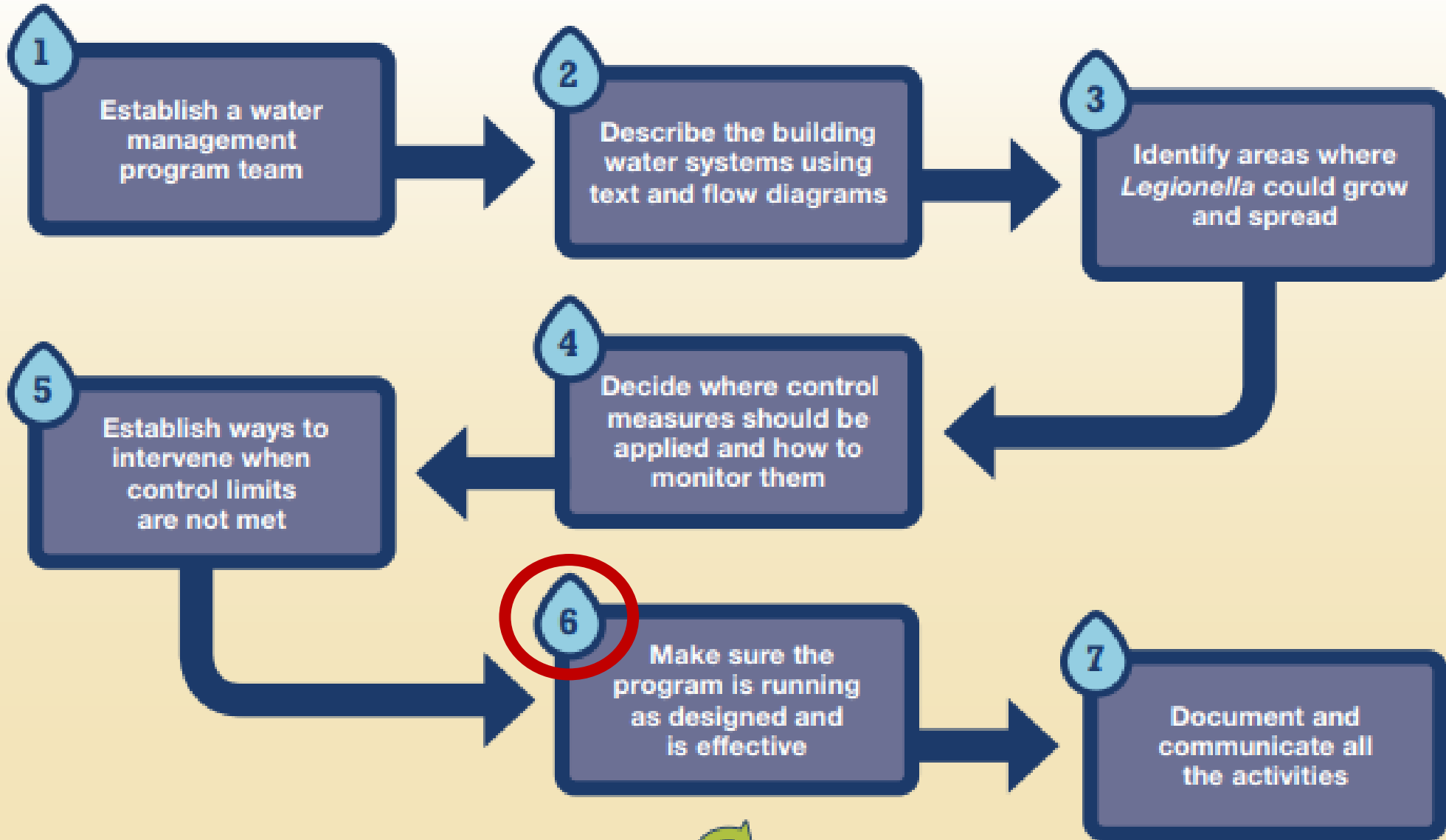
March 2026



[Toolkit for Controlling Legionella in Common Sources of Exposure \(Legionella Control Toolkit\)](#)



[CSTE Legionella Remediation .pdf](#)



Continuous program review (see below)

What's Involved?

Verification



What's Involved?

Verification



Validation



Frequently Encountered Issues with WMP Validation



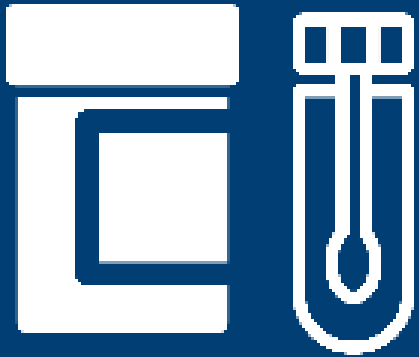
- There is no validation strategy in the absence of legionellosis cases.

Frequently Encountered Issues with WMP Validation



- There is no validation strategy in the absence of legionellosis cases.
- There is no strategy to identify legionellosis cases.

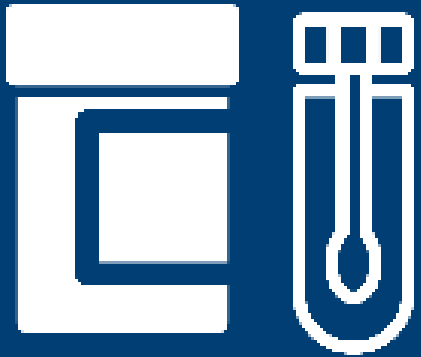
Legionella Environmental Testing



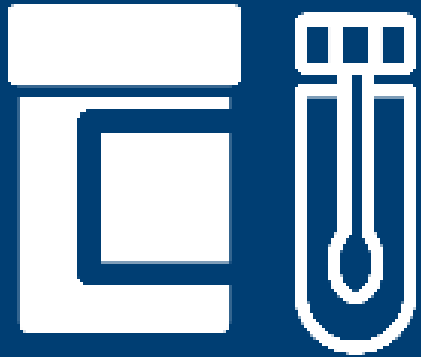
- Testing the building's water for *Legionella* can be an effective validation strategy.
- *Legionella* is technically challenging to isolate.
- [CDC ELITE member labs](#) validate their skills regularly.

Tips for Success with Environmental *Legionella* Testing

- Collect enough samples.

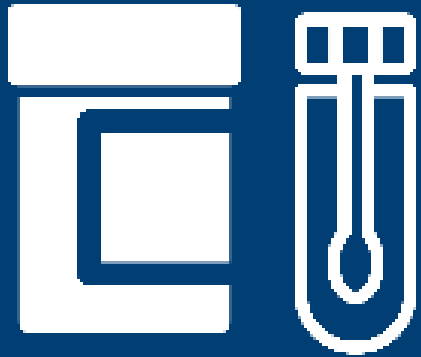


Tips for Success with Environmental *Legionella* Testing



- Collect enough samples.
- Complete a thorough risk assessment.

Tips for Success with Environmental *Legionella* Testing



- Collect enough samples.
- Complete a thorough risk assessment.
- Have a plan for interpreting results.

Example Outcomes of *Legionella* Testing

Scenario 1



Example Outcomes of *Legionella* Testing

Scenario 1



Scenario 2



Example Outcomes of *Legionella* Testing

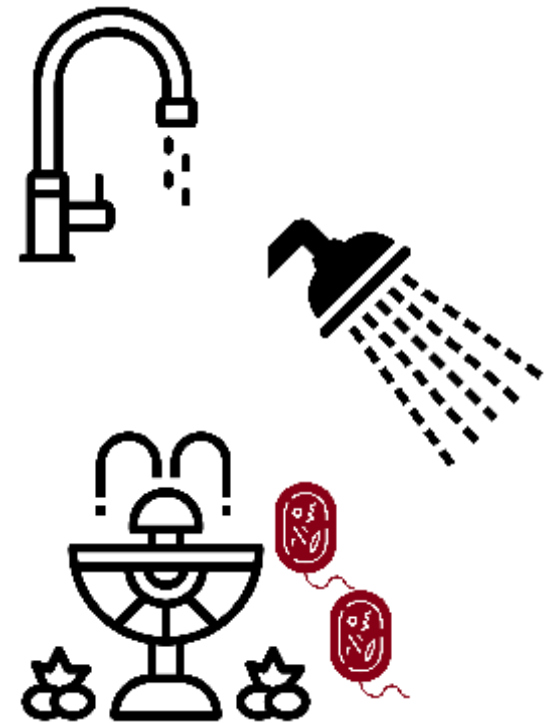
Scenario 1



Scenario 2



Scenario 3



Common Sampling Locations for *Legionella* During Public Health Investigations



Incoming water



Each plumbing fixture in case-patient apartments



Each water heater



Distally-located plumbing fixtures on each floor



Hot water return line



High-risk plumbing fixtures in shared spaces

Common Sampling Locations for *Legionella* During Public Health Investigations



Incoming water



Each water heater



Hot water return line



High-risk plumbing fixtures in shared spaces



Each plumbing fixture in case-patient apartments



Distally-located plumbing fixtures on each floor

Tailor sampling locations to the environmental assessment and case investigation findings.

Example Routine Testing Strategy

Figure 1. Routine *Legionella* testing: A multifactorial approach to performance indicator interpretation*^o^Δ

Concentration indicates that *Legionella* growth appears:

| Uncontrolled | Poorly Controlled | Well Controlled | | | |
|--|-----------------------------------|---|--|---|--|
| ≥10 CFU/mL [†] in potable water | 1.0–9.9 CFU/mL in potable water | Detectable to 0.9 CFU/mL in potable water | No <i>Legionella</i> detected in a single round of testing | No <i>Legionella</i> detected in multiple rounds of testing | No <i>Legionella</i> detected in multiple rounds of testing with methods that detect viable and non-viable bacteria of any <i>Legionella</i> species |
| OR ≥100 CFU/mL in cooling towers | OR 10–99 CFU/mL in cooling towers | OR Detectable to 9 CFU/mL in cooling towers | | | |

Change in concentration over time indicates that *Legionella* growth appears:

| Uncontrolled | Poorly Controlled | Well Controlled | | | |
|--|--|---|--|---|--|
| 100-fold or greater increase in concentration (e.g., 0.05 to 5 CFU/mL) | 10-fold increase in concentration (e.g., 0.05 to 0.5 CFU/mL) | <i>Legionella</i> concentration steady (e.g., 0.5 CFU/mL for two consecutive sampling rounds) | No <i>Legionella</i> detected in a single round of testing | No <i>Legionella</i> detected in multiple rounds of testing | No <i>Legionella</i> detected in multiple rounds of testing with methods that detect viable and non-viable bacteria of any <i>Legionella</i> species |

Extent indicates that *Legionella* growth appears:

| Uncontrolled | Poorly Controlled | Well Controlled | | | |
|---|--|---|--|---|--|
| Detection in multiple locations AND a common source location [‡] | Detection in a common source location that serves multiple areas | Detection in a few of many tested locations within a water system | No <i>Legionella</i> detected in a single round of testing | No <i>Legionella</i> detected in multiple rounds of testing | No <i>Legionella</i> detected in multiple rounds of testing with methods that detect viable and non-viable bacteria of any <i>Legionella</i> species |
| OR Detection across many locations within a water system | OR Detection in more than one location within a water system | | | | |

Type[§] of *Legionella* (species and serogroup) associated with Legionnaires' disease:

| Highly Associated | Less Associated |
|---|--|
| <i>L. pneumophila</i> serogroup 1; Non-Lp1 <i>L. pneumophila</i> ; Presence of multiple different <i>Legionella</i> species or serogroups | Any non- <i>pneumophila</i> <i>Legionella</i> species including "blue-white" fluorescent <i>Legionella</i> |

* This figure is intended for use during routine testing of potable water and cooling towers only. Due to their ability to rapidly grow and spread *Legionella*, any detection of viable *Legionella* in a hot tub or decorative fountain should prompt a response, including a review of the water management program and corrective actions. Test results are performance indicators and are not a measure of risk of human illness. This figure is not intended for use if a building or device is associated with Legionnaires' disease (LD) cases or an outbreak.

^o See "Routine testing for *Legionella*" for guidance regarding suggested response activities. Comparable results may lead to different suggested response activities when other factors are considered (e.g., if there is evidence of poorly controlled growth at a healthcare facility).

^Δ Considering the type of *Legionella* identified along with other *Legionella* testing performance indicators provides a clearer picture of water system control than the results of any single indicator. For example, facility owners and operators may consider implementing immediate interventions for a healthcare facility with: A. detectable but <10 colony-forming units per milliliter (CFU/mL), B. non-Lp1 *Legionella pneumophila*, C. observed at steady concentrations, but D. detected at multiple distal locations including a central water heater.

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[‡] Common source location examples include water heaters, hot water returns, storage tanks, and cooling tower basins.

[§] If a facility has a history of associated LD cases, then sequencing isolates obtained during routine testing may provide performance indicators regarding outbreak strain persistence (if that strain is detected).



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Additional Activities for Multimodal Validation



Active clinical surveillance

Additional Activities for Multimodal Validation



Active clinical surveillance



Physical and chemical parameter measurements

Additional Activities for Multimodal Validation



Active clinical surveillance



Physical and chemical parameter measurements

Clinical surveillance activities do not replace environmental risk assessment or environmental *Legionella* testing and should not be the sole method of validation.



Case Study Break

Case Study: Cooling Tower Testing



- A facility is beginning to implement a routine testing program that includes one cooling tower.
- One bulk water sample is collected from the water collection basin for a *Legionella* culture.

Case Study: Cooling Tower Testing



- Eleven days later, the lab reports *Legionella pneumophila* is detected at 2.7 CFU/mL.
- **What should the facility team do, based on these results?**

Case Study: Cooling Tower Testing



- a) Implement immediate corrective action
- b) Collect another sample and retest for *Legionella*
- c) No action needed; continue to implement the program
- d) More information is needed

Case Study: Cooling Tower Testing



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Case Study: Cooling Tower Testing

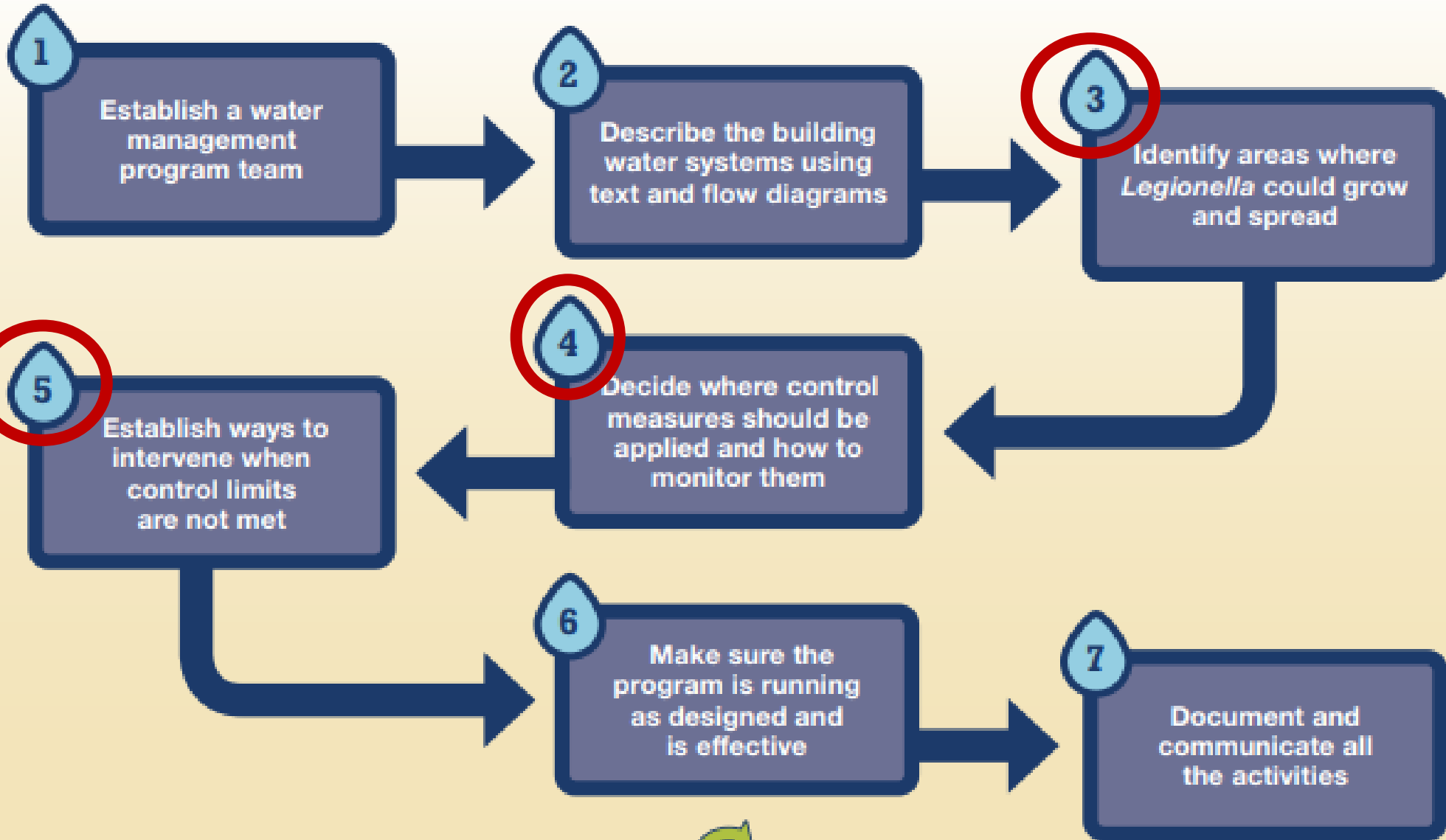


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Case Study: Cooling Tower Testing



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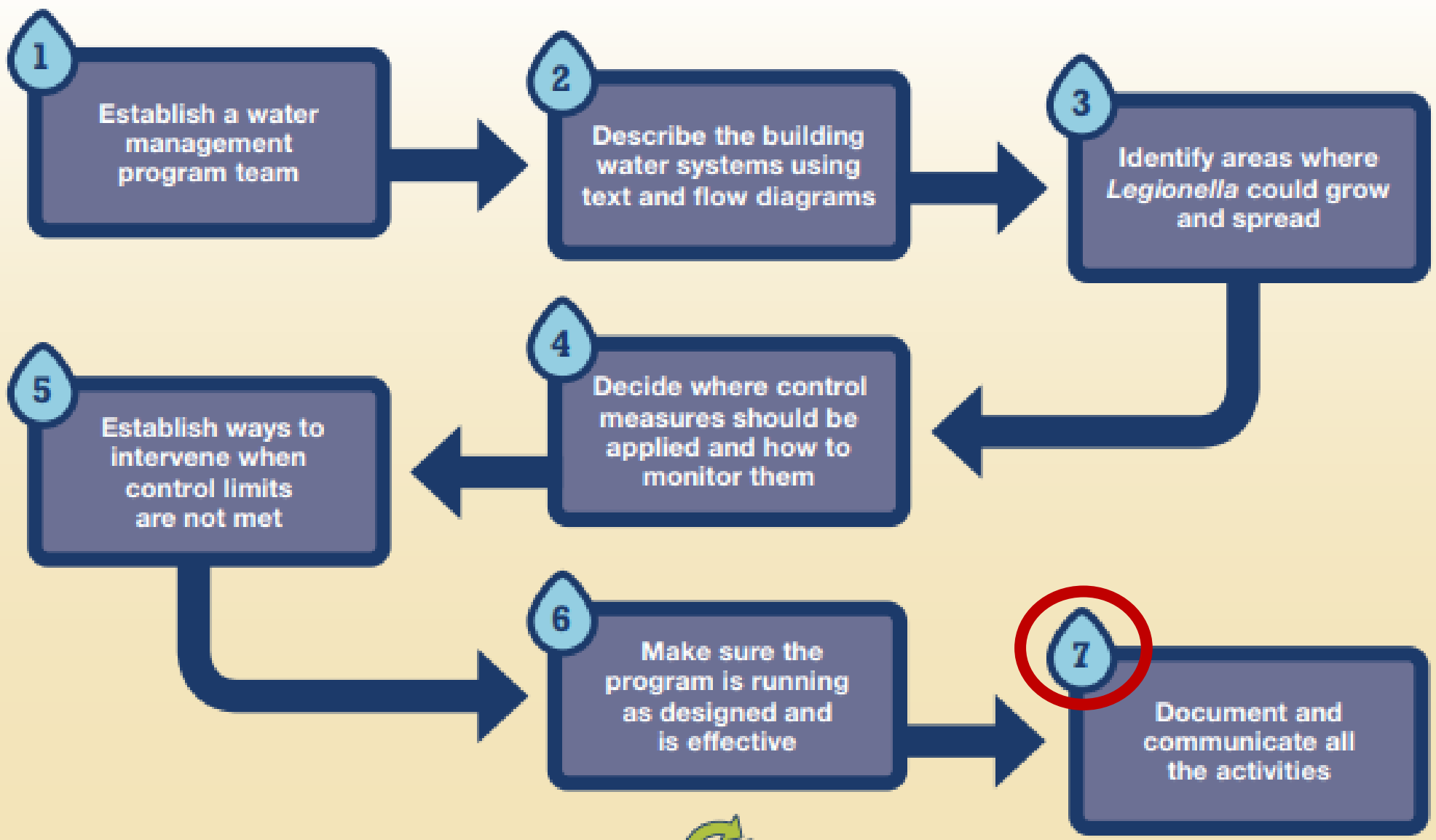


Continuous program review (see below)

Case Study: Cooling Tower Testing



Outcome: Acute corrective actions included initial online disinfection of the water collection basin followed by offline disinfection and cleaning as well as repairing the hole in the collection basin.



Continuous program review (see below)

Investigation Case Study: A Water System Disruption

Case Study: Facility A



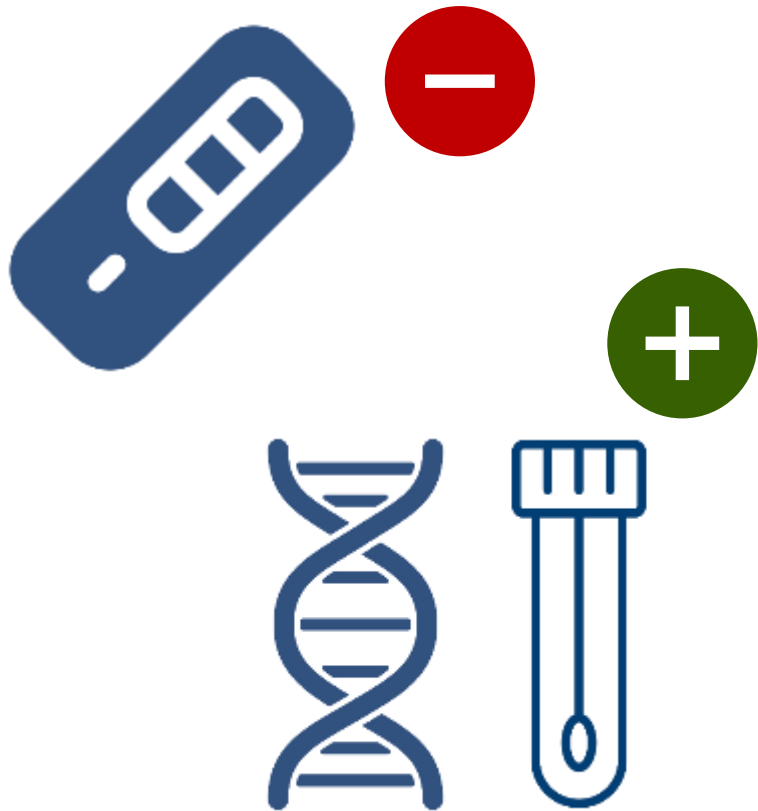
- Small assisted living facility with memory care unit
- Corporate owned
- No known previous history of legionellosis

Case Presentation

- Symptoms appear which include a high fever, dyspnea, altered mental status, and arrhythmia (day 0).

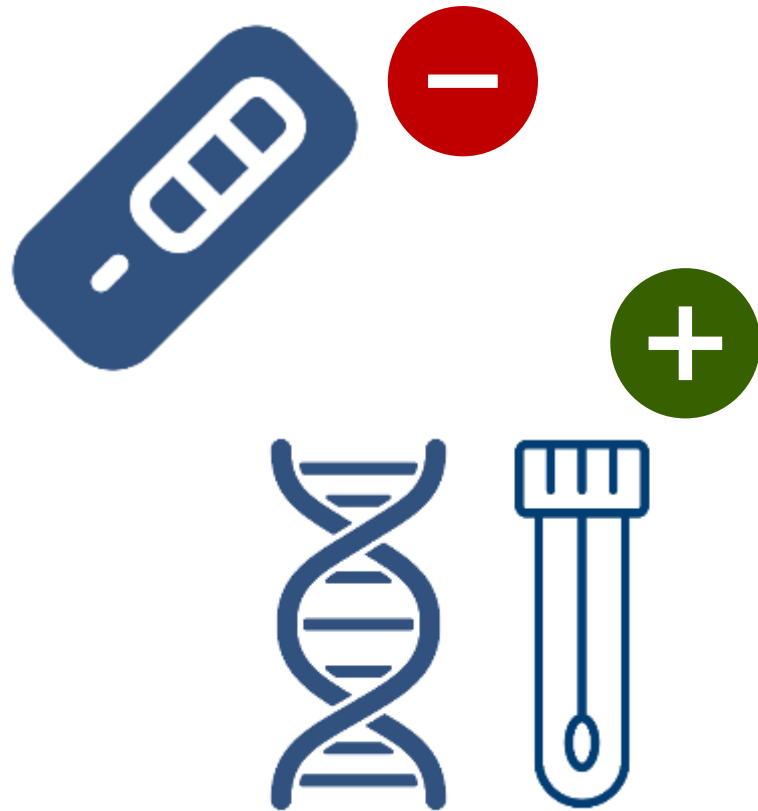


Case Presentation



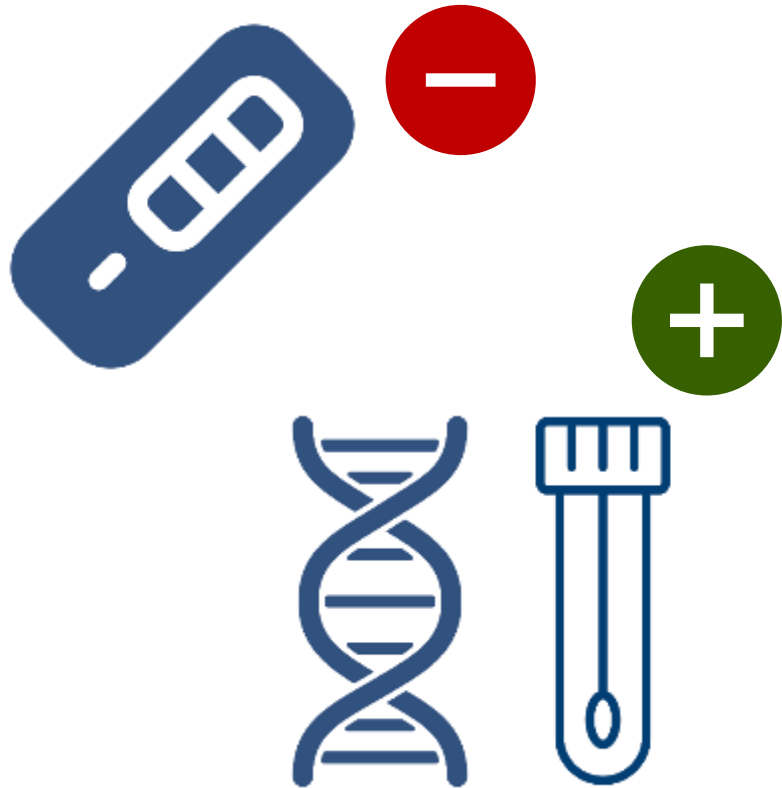
- Symptoms appear which include a high fever, dyspnea, altered mental status, and arrhythmia (day 0).
- The urine antigen is negative and the nasopharyngeal (NP) is **PCR positive** (day 2; day of admission).

Case Presentation



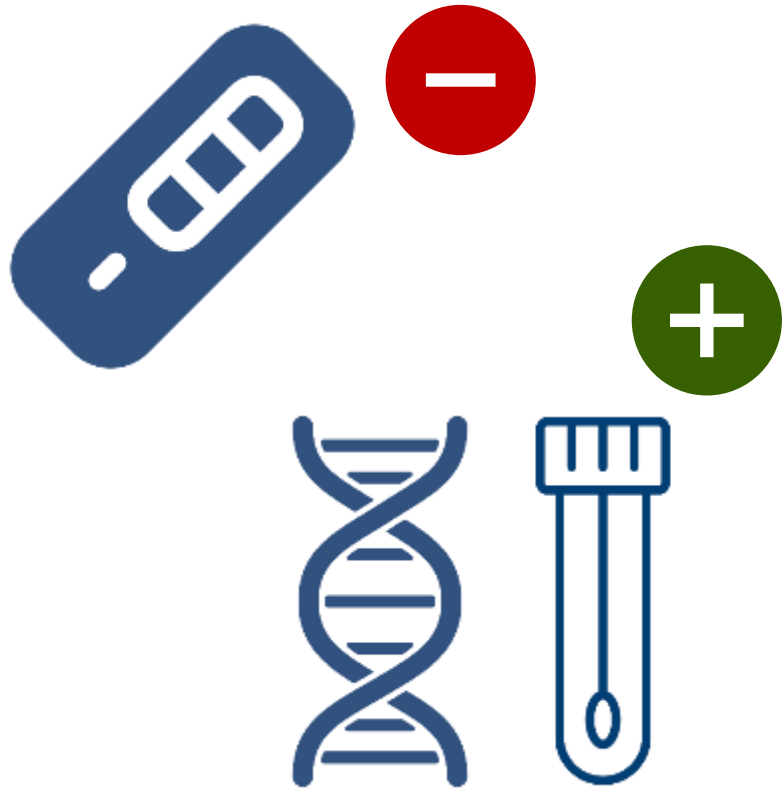
- Symptoms appear which include a high fever, dyspnea, altered mental status, and arrhythmia (day 0).
- The urine antigen is negative and the nasopharyngeal (NP) is **PCR positive** (day 2; day of admission).
- Sputum is collected for routine respiratory culture (day 3; day after admission).

Case Presentation



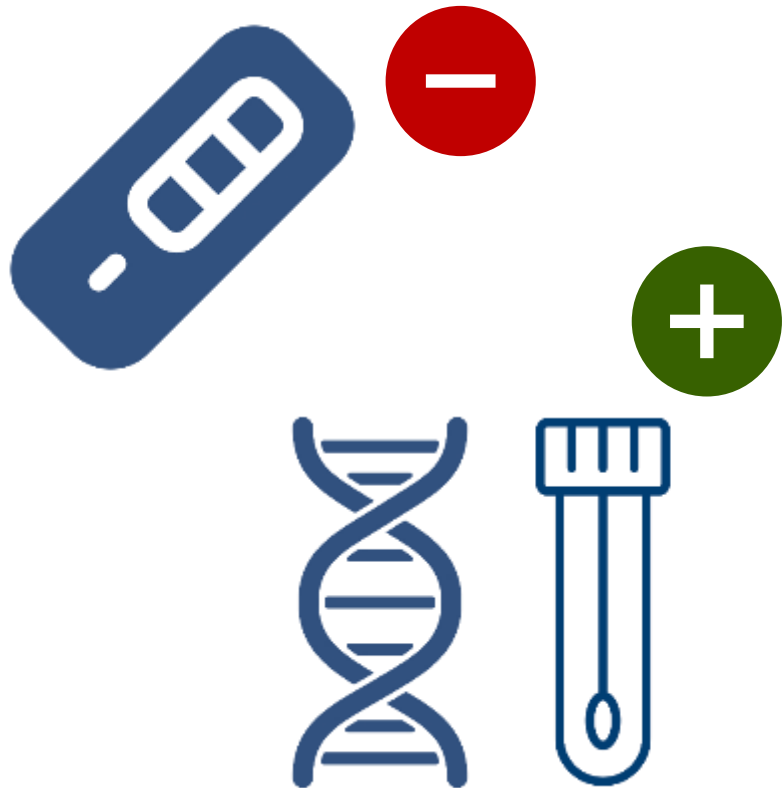
- Positive NP PCR is reported to public health (day 4, night).

Case Presentation



- Positive NP PCR is reported to public health (day 4, night).
- Public health requests that the sputum be sent to WSLH for fee-exempt *Legionella* culture and PCR (day 5, morning).

Case Presentation



- Positive NP PCR is reported to public health (day 4, night).
- Public health requests that the sputum be sent to WSLH for fee-exempt *Legionella* culture and PCR (day 5, morning).

Surveillance criteria is not met at this time.

Case Presentation



- A radiographic and clinical diagnosis of **pneumonia** is made.

Case Presentation



- A radiographic and clinical diagnosis of **pneumonia** is made.
- No alternative etiology is identified.

Case Presentation



- A radiographic and clinical diagnosis of **pneumonia** is made.
- No alternative etiology is identified.
- The patient remains in the **long-term care facility**.

Case Presentation



- Radiographic and clinical diagnosis of **pneumonia** is made.
- No alternative etiology is identified.
- The patient remained in a **long-term care facility**.
- The patient keeps plants in their room with greenhouse conditions.

Water Management Program



- The facility team is unsure if they have a written WMP.

Water Management Program



- The facility team did not know they had a written WMP.
- The WMP lacked a water system description but did identify risk factors and contingency responses.

Immediate Control Measures



- A consultant is contacted and point of use (POU) filters are placed on community plumbing fixtures in patient's unit (day 5).

Immediate Control Measures



- A consultant is contacted and point of use (POU) filters are placed on community plumbing fixtures in patient's unit (day 5).
- Environmental **samples are collected** (day 5).

Immediate Control Measures



- A consultant is contacted and point of use (POU) filters are placed on community plumbing fixtures in patient's unit (day 5).
- Environmental **samples are collected** (day 5).
- Surveillance for additional residents with pneumonia begins.

Immediate Control Measures: Sampling



Environmental samples are collected (day 5) from:

- The patient's sink in their room.
- Both community showering areas (first draw).
- Both community showering areas (long draw).
- The community ice machine.

Immediate Control Measures: Surveillance



- Public health is notified that **three additional residents were diagnosed** with pneumonia (day 10).
- All three were urine antigen negative.

Immediate Control Measures: Surveillance



- Public health is notified that **three additional residents were diagnosed** with pneumonia (day 10).
- All three were urine antigen negative.

Public health investigation is initiated.

Immediate Control Measures: Sampling



Environmental samples are collected (day 5) from:

- The patient's sink in their room. +
- Both community showering areas (first draw). +
- Both community showering areas (long draw). +
- The community ice machine. -

Immediate Control Measures: Sampling



Environmental samples are collected (day 5) from:

- The patient's sink in their room. **+
<1 CFU/mL**
- Both community showering areas (first draw). **+**
- Both community showering areas (long draw). **+**
- The community ice machine. **-**

Immediate Control Measures: Sampling



Environmental samples are collected (day 5) from:

- The patient's sink in their room. **+**
<1 CFU/mL
- Both community showering areas (first draw). **+** **~5-20 CFU/mL**
- Both community showering areas (long draw). **+**
- The community ice machine. **-**

Immediate Control Measures: Sampling



Environmental samples are collected (day 5) from:

- The patient's sink in their room. **+**
<1 CFU/mL
- Both community showering areas (first draw). **+** **~5-20 CFU/mL**
- Both community showering areas (long draw). **+** **~20-100 CFU/mL**
- The community ice machine. **-**

Immediate Control Measures: Sampling



All environmental isolates were *Legionella pneumophila*, but **not** serogroup 1.

Corrective Action: Acute Remediation



The facility completed potable water system hyperchlorination upon receiving results.

Corrective Action: Acute Remediation



The facility completed potable water system hyperchlorination upon receiving results.

There are no confirmed cases of Legionnaires' disease yet.

Public Health Environmental Assessment

- An onsite assessment is completed (day 17).
- The facility has a **combined water service** for fire suppression and domestic water.
- Water service was shut down for fire suppression system maintenance.



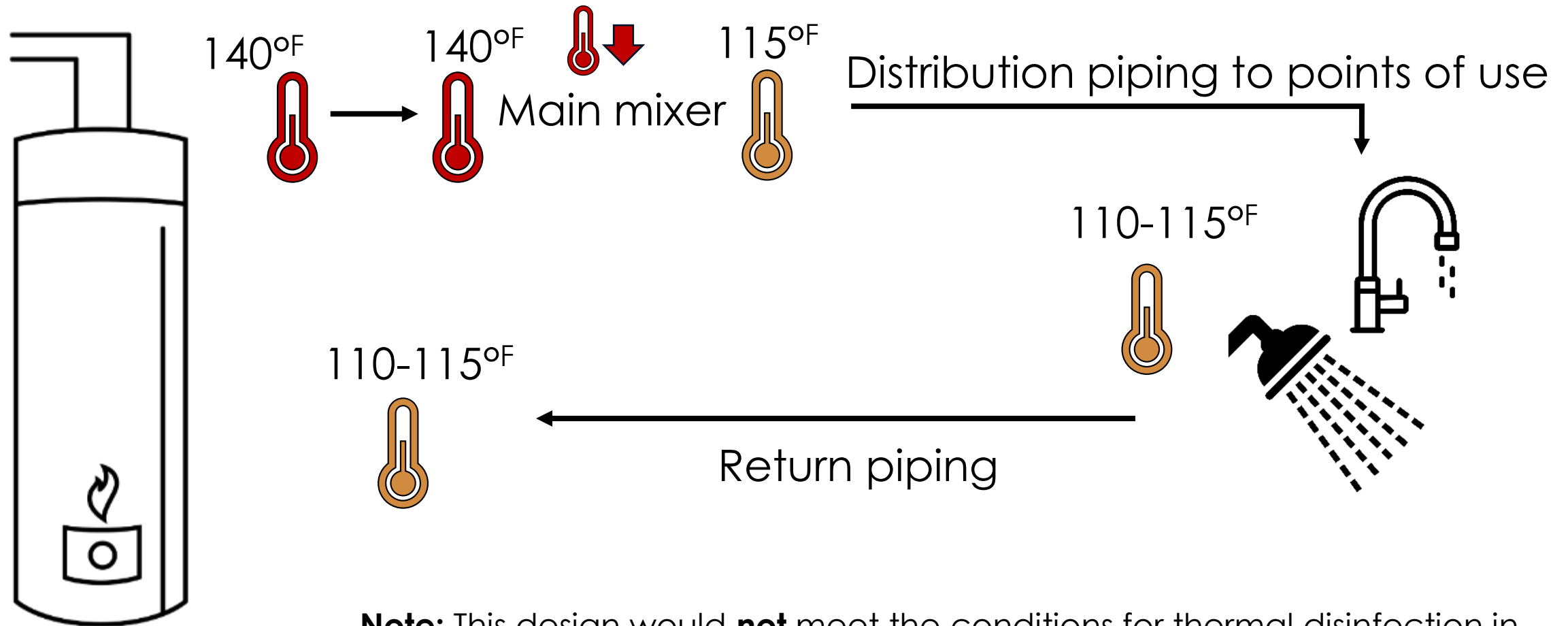
Public Health Environmental Assessment

- The hot water was initiated at 125°F.
- The water management program indicated that hot water should initiate at 140°F.

A central thermostatic mixing valve failure was suspected.

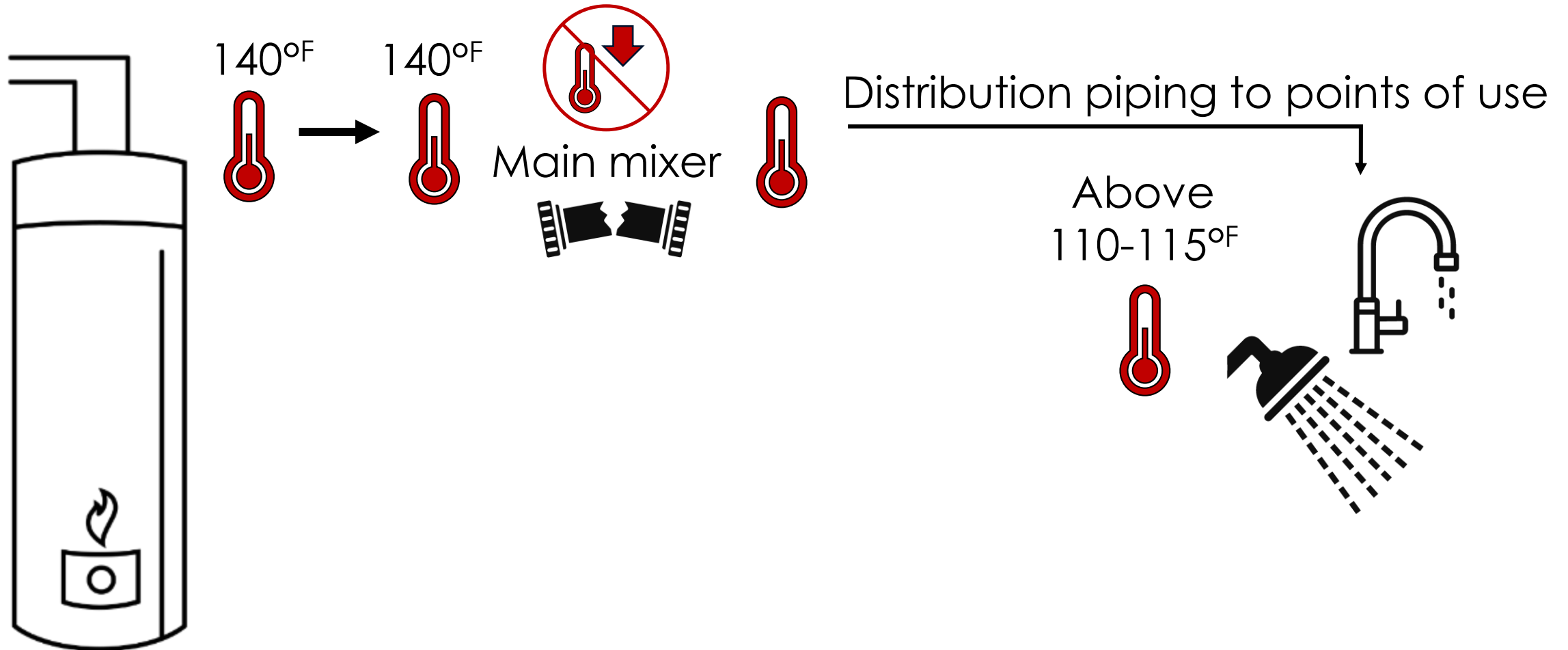


Example of Common Hot Water System Configuration in Health Care Facilities

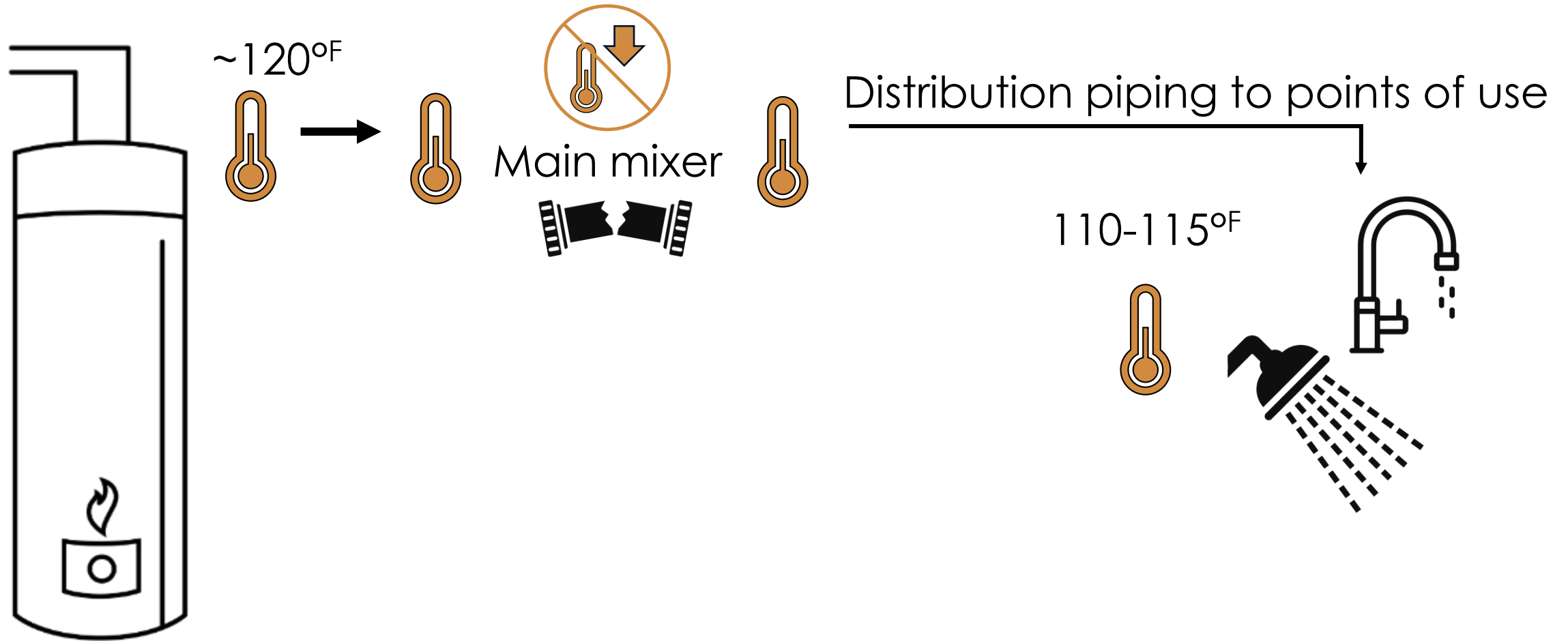


Note: This design would **not** meet the conditions for thermal disinfection in health care and related facilities (SPS 382.50(3)(b)6.) for buildings constructed after May 1st, 2003.

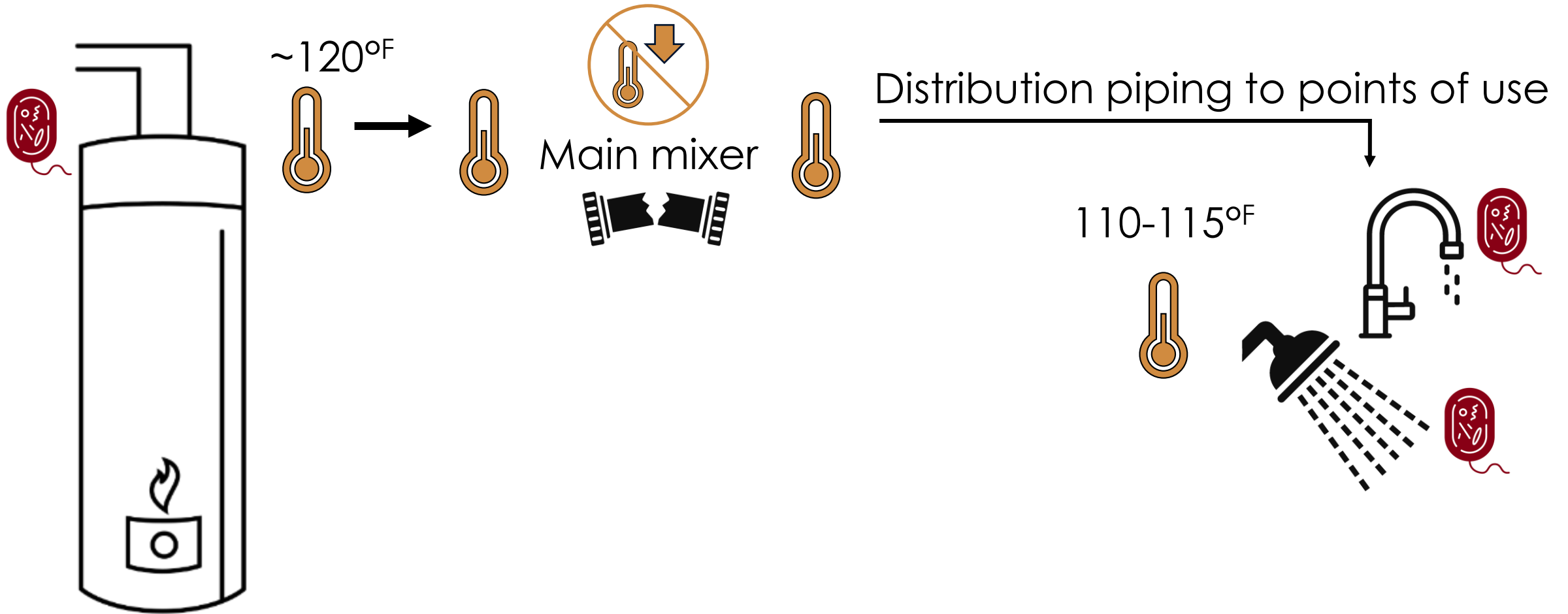
Flow Diagram of Possible Consequences of Main Mixer Failure



Flow Diagram of Possible Consequences of Main Mixer Failure



Flow Diagram of Possible Consequences of Main Mixer Failure



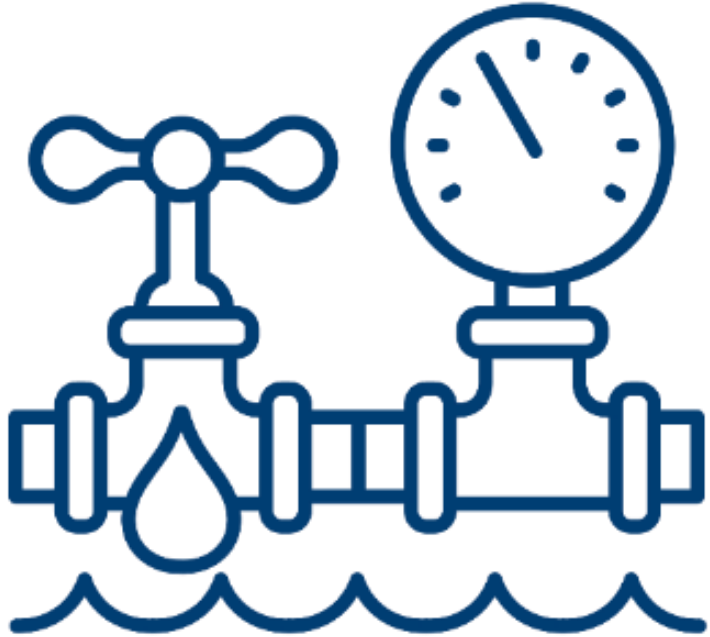
Public Health Environmental Assessment

- An unused shower was identified.
- Facility staff **could not recall flushing** this device.
- There was no detectable free chlorine.

**Additional samples
were collected at this location.**



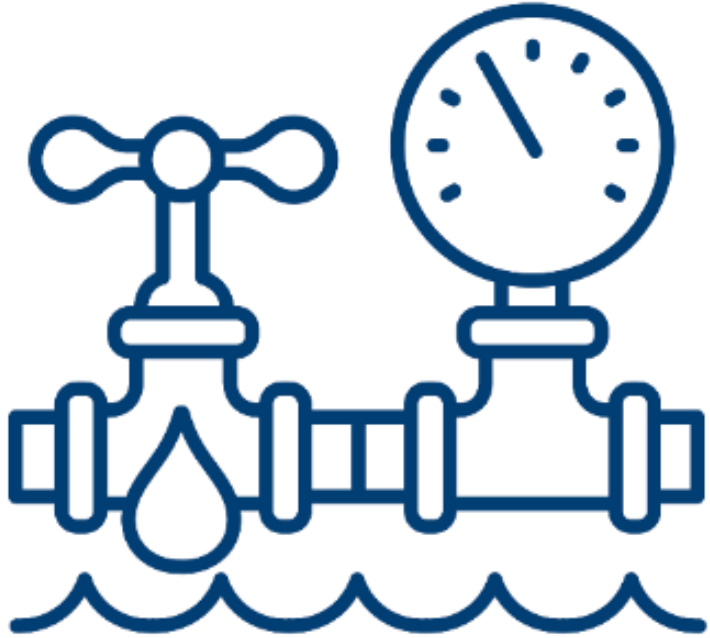
Investigation Next Steps



1 confirmed case
3 probable cases

- Initial case-patient sputum was PCR positive (day 18) and the culture was negative.
- Facility hyperchlorination validation testing was negative...

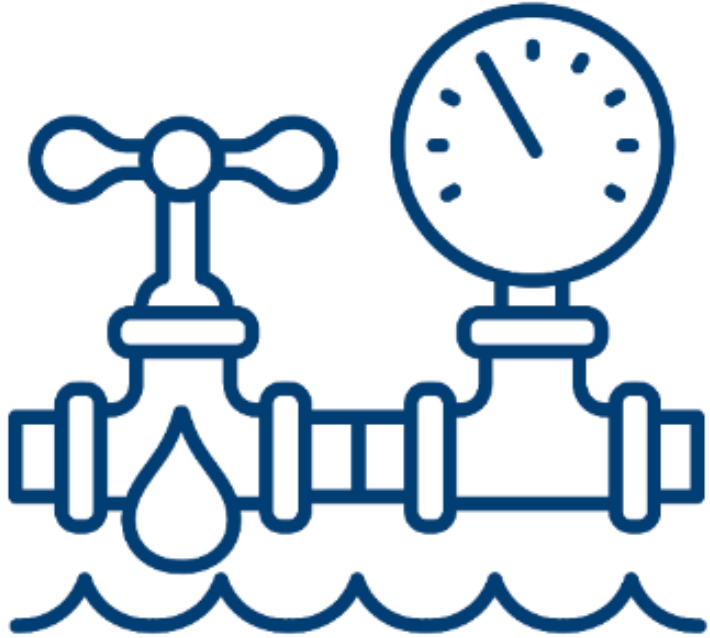
Investigation Next Steps



1 confirmed case
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- Initial case-patient sputum was PCR positive (day 18) and the culture was negative.
- Facility hyperchlorination validation testing was negative **except for unused shower.**

Investigation Next Steps



1 confirmed case
3 probable cases

- Initial case-patient sputum was PCR positive (day 18) and the culture was negative.
- Facility hyperchlorination validation testing was negative **except for unused shower.**
- Unused shower was flushed, and further validation testing was negative.

Take Homes From Facility A

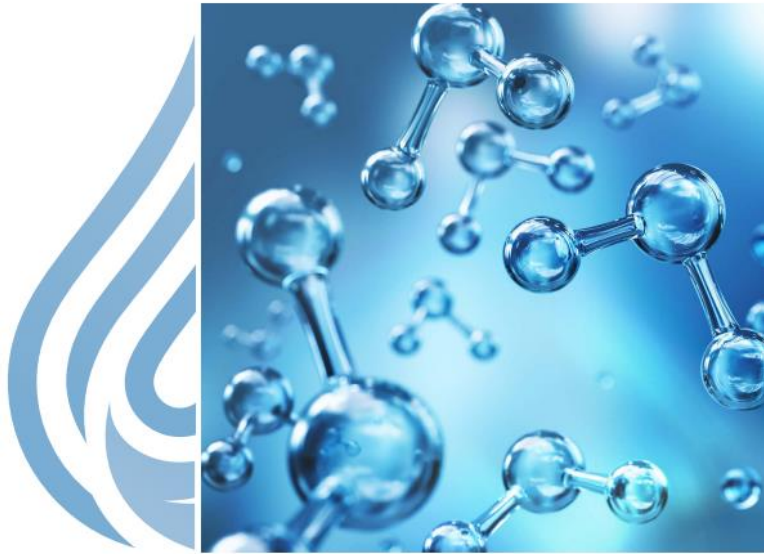


- Passive clinical surveillance may not be enough to detect a problem.
- WMPs are a process, not just a written document.
- *Legionella* problems can occur with acute and chronic system changes.

Suggested Homework



Water Management
Program (WMP)
Evaluation Tool



[Resources](#) are available to help you determine if your facility's Water Management Program is ASHRAE-188 compliant.



Questions?

Thank you!

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