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March 27, 2020

**VIA EMAIL:** ([COPN@VDH.Virginia.gov](mailto:COPN@VDH.Virginia.gov))

Erik Bodin, Director  
 Division of Certificate of Public Need  
 9960 Mayland Drive, Suite 401  
 Henrico, Virginia 23233

**RE: Carilion Roanoke Memorial Hospital - Hospital Licensure Number: H 1840**

**Carilion Roanoke Community Hospital - Hospital License Number: H 1839**

**Request for Authorized Bed Capacity Increase in Response to COVID-19  
 Architecture and Design Temporary Variance Request for Bed Addition**

Dear Mr. Bodin:

Pursuant to Executive Order Fifty-Two (2020) issued on March 20, 2020, Carilion Medical Center (“CMC”) requests the Commissioner’s authorization for a licensed bed capacity increase to serve additional patients during the COVID-19 pandemic emergency. CMC is composed of two licensed general hospitals – Carilion Roanoke Memorial Hospital (“CRMH”) and Carilion Roanoke Community Hospital (“CRCH”). This letter restates the March 23, 2020 letters submitted on behalf of CRMH and CRCH, and supplements for recent VDH guidance on bed capacity increase requests.

Currently authorized to operate a total of 752 beds<sup>1</sup>, CMC requests authorization to operate a total of 872 licensed beds as outlined in greater detail the following table:

Facility Name	Facility Address	Current Authorized Beds	Number of Additional Licensed Beds Requested by Type	Total Licensed Beds After Bed Addition
CRMH Campus	1906 Belleview Ave. SE Roanoke, VA 24014	718	54 med/surg 20 ICU	792
CRCH Campus	101 Elm Ave Roanoke, VA 24013	34	46 med/surg	80
<b>CMC TOTAL</b>		<b>752</b>	<b>120</b>	<b>872</b>

<sup>1</sup> This bed count includes 15 inpatient psychiatric beds at CRMH recently authorized through the Virginia Certificate of Public Need process. While the beds have been COPN-approved, they have not yet been added to the CRMH license.

## **I. Description of Facility**

CMC is part of the Carilion Clinic, serving patients in Southwest Virginia. CMC's main campus location is Carilion Roanoke Memorial Hospital ("CMC -CRMH Campus"), located at 1906 Belleview Avenue, Roanoke, Virginia 24014. Additionally, CMC operates a remote location at Carilion Roanoke Community Hospital ("CMC-CRCH Campus"), located at 101 Elm Avenue, Roanoke, Virginia 24013. CMC is the only Level I Trauma Center within 100 miles of other similarly situated hospitals. CMC has 752 beds and is currently operating at surge capacity with a daily-increasing adult census.

## **II. Licensed Bed Expansion Plan**

### **A. The proposed bed expansion is necessary to respond to an anticipated shortage in bed capacity at CMC due to COVID -19.**

Due to the influx of patients and increased bed utilization resulting from the COVID-19 pandemic, CMC is now confronting unprecedented operational challenges, including ongoing efforts to maintain proper infection control standards and protocol, in order to care for COVID-19 patients. On Thursday, March 13, 2020, due to the influx of patients, for a period of four hours, CMC activated its Disaster Management System in order to maintain infection control standards. Following this episode, CMC has continued to operate under incident command management.

*CMC has already made efforts to increase availability of existing beds on its two campuses.* Prior to the increase in patients attributed to the escalating pandemic, CMC was operating at more than 95% adult capacity, partially due to treatment of seasonal flu. In advance of the anticipated additional influx of patients, CMC cancelled elective surgeries. At the same time, CMC published significant public notices and messaging regarding appropriate use of the Emergency Department ("ED"). Further, regional Emergency Medical Services revised protocols for non-transport of suspected COVID-19 patients. Despite all these efforts, CMC continues to operate at high capacity.

*Current State of COVID-19 in the facility's community.* As of March 26, 2020, six patients in Southwest Region tested positive for COVID-19. Many more patients have been screened for COVID-19 and are waiting for test results. To date, one COVID-19 case has been admitted as an inpatient at CMC. As the number of COVID-19 cases increases, the current surge capacity situation at CMC will be further exacerbated. CMC anticipates it will have a bed capacity shortage in the immediate future if the proposed bed addition is not approved.

*There are no reasonable alternatives to approval of CMC's proposed bed expansion to address the need for greater hospital bed capacity in the community.* Nursing homes in Carilion's primary referral regions report limited available bed capacity. Other hospitals in the area are also anticipating bed capacity shortages in the immediate future. Other types of community housing are limited. Several buildings have been suggested; however, at this time, those sites present significant logistical and care issues. These locations have been discussed with local municipal emergency management officials.

**B. Locations of Bed Addition and Life Safety Code Consideration**

Location	Proposed Beds Added	Life Safety Code Considerations
CRMH 5 North (TCU)	10 ICU beds will be added in the TCU area on the East Pavilion, 5 <sup>th</sup> Floor.	This smoke compartment and suite are maintained as existing healthcare occupancy as shown by the life safety plans. See CRMH F-105, Smoke Compartment 5D, Suite S3. This location meets the requirements of NFPA 101-2012 for a patient care, sleeping suite. The suite area does not exceed 5000 ft <sup>2</sup> , travel distance does not exceed 100 ft to an exit access or 200 ft to an exit, and CRMH is protected throughout by an approved electrically supervised sprinkler system.
CRMH 4 West	27 medical/surgical beds will be added in the outpatient surgery area on the West Pavilion, 4 <sup>th</sup> Floor	This smoke compartment is maintained as existing healthcare occupancy as shown by the life safety plans and the occupancy use is sleeping. See CRMH F-104, Smoke Compartment 4A. This location meets the requirements of NFPA 101-2012 for a smoke compartment containing patient sleeping rooms. The total area does not exceed 22,500 ft <sup>2</sup> , travel distance does not exceed 200 ft to an exit, and CRMH is protected throughout by an approved electrically supervised sprinkler system.
CRMH 6 <sup>th</sup> Floor Mountain Pavilion	6 Beds (PACU) 4 Beds (PAPA)  10 total ICU beds will be added on the Mountain Pavilion, 6 <sup>th</sup> Floor	<p>PACU: This smoke compartment is maintained as existing healthcare occupancy as shown by the life safety plans and the occupancy use is treatment. See CRMH F-106, Smoke Compartment 6E. This location meets the requirements of NFPA 101-2012 for a smoke compartment. The total area does not exceed 22,500 ft<sup>2</sup>, travel distance does not exceed 200 ft to an exit, and CRMH is protected throughout by an approved electrically supervised sprinkler system. The proposed beds are located in a single room with direct visual supervision from the nurse's station and the room is separated from the corridor by at least a smoke partition.</p> <p>PAPA: This smoke compartment is maintained as existing healthcare occupancy as shown by the life safety plans and the occupancy use is sleeping. See CRMH F-106, Smoke Compartment 6F. This location meets the requirements of NFPA 101-2012 for a smoke compartment. The total area does not exceed 22,500 ft<sup>2</sup>, travel distance does not exceed 200 ft to an exit, and CRMH is</p>

		protected throughout by an approved electrically supervised sprinkler system. The proposed beds are located in a single room with direct visual supervision from the nurse's station and the room is separated from the corridor by at least a smoke partition.
CRMH Floors 6, 8, 9 – East Pavilion	27 medical/surgical beds will be added in former patient care areas turned into offices in the East Pavilion on the 6 <sup>th</sup> , 8 <sup>th</sup> and 9 <sup>th</sup> floors.	These smoke compartments are maintained as existing healthcare occupancy as shown by the life safety plans and the occupancy use is treatment. See CRMH F-106, Smoke Compartment 6G; CRMH F-108, Smoke Compartment 8F; and CRMH F-109, Smoke Compartment 9F. These locations meet the requirements of NFPA 101-2012 for a smoke compartment. The total area does not exceed 22,500 ft <sup>2</sup> , travel distance does not exceed 200 ft to an exit, and CRMH is protected throughout by an approved electrically supervised sprinkler system. A deficiency was noted for the East Pavilion, seventh floor regarding the fire protection ratings between floors, and Carilion agreed to not use these floors for inpatient services. Improvements were made to the barriers and automatic suppression system. Interim Life Safety Measures will be to perform a fire watch or to install local smoke detection in patient rooms while using the seventh and adjacent floors as patient sleeping rooms.
CRCH Floors 9 and 10	46 medical/surgical beds will be added in former patient care areas turned into offices on the 9 <sup>th</sup> and 10 <sup>th</sup> floors.	Certain but not all areas that will include the additional beds lack a nurse call system or private restroom. Some rooms have carpet.

**C. Planned Use/Management of Additional Licensed Beds**

- Infection Prevention: The additional licensed beds are necessary to further isolation precaution processes at CMC and to accommodate any growing census.
- Managing PCU and MS level of care capacity and creating ICU, PCU, Medical Surgical capacity: CMC will operationalize priorities for patient care. CMC has implemented isolation precautions for patients under investigation (PUI). The requested additional licensed beds will allow CMC to continue to optimize throughput and avoid capacity constraints caused by lack of PCU MS acuity bed space. The requested additional licensed beds will allow for continuance of infection prevention and isolation protocols.
- Managing overall bed capacity: CMC uses real-time capacity management processes and tools to monitor capacity and throughput. Tele-tracking software technology is tracking our capacity (COVID-19 and non-COVID-19). The Carilion Transfer and Communications Center (CTAC) is a state-of-the-art Operations Center and has situational

awareness of hospital-wide bed capacity, as well as system-wide bed capacity. Internationally recognized for operational management of hospitals/system. CTaC is a Certified Command Operations Center.

**D. Availability of Professional and Ancillary Staff to provide care in the Additional Beds**

Staffing for the additional licensed beds is being coordinated and directed by onsite CMC incident command team and the Carilion System Staffing Branch incident command team (ICT), led by the Chief Nursing Officer. CMC and Carilion Departments that have experienced low or no patient volumes have reported their staffing resources to the staffing branch. Educational competencies and orientations to staff in the new licensed bed area will be addressed by this staffing branch and CMC incident command. These areas will also have access to the code blue and staff assistance team.

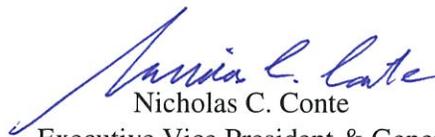
Finally, CMC incident command and Operations Branch of the Carilion Clinic incident command team, led by Michael Abbott, SVP of CMC, is tasked with ensuring that operational and care management needs are fully addressed.

**E. Availability of Medical Supplies and Personal Protective Equipment (“PPE”) in the Facility**

All PPE and supply logistics are being monitored and routinely communicated with ICT from the logistics branch of Carilion ICT, led by Tom Hill, SVP support services. This branch is supporting supply requirements of CMC.

If you require additional information or have any questions regarding this notice, please contact Paul Davenport, VP, Hospital Operations at 540-981-9448 or [pbdavenport@carilionclinic.org](mailto:pbdavenport@carilionclinic.org), or me.

Very Truly Yours,



Nicholas C. Conte

Executive Vice President & General Counsel

cc: Ruthanne Risser, Director, Acute Care Division, Virginia Department of Health  
(Via email: [Ruthanne.Risser@vdh.virginia.gov](mailto:Ruthanne.Risser@vdh.virginia.gov))