

VIRGINIA DEPARTMENT OF HEALTH

Office of Licensure and Certification

Staff Analysis

April 6, 2020

Birdmont Healthcare, LLC d/b/a Carrington Place at Wytheville (4/1/2020)

Wytheville, Virginia

Temporarily add 20 skilled nursing home beds at Carrington Place at Wytheville in response to the COVID-19 crisis

Facility

Birdmont Healthcare, LLC, doing business as Carrington Place at Wytheville (CPW), is located in Wytheville, Virginia in Planning District (“PD”) 3, Health Planning Region (“HPR”) III.

Background

On March 12, 2020, Governor Ralph Northam declared a state of emergency throughout Virginia in response to the coronavirus pandemic. Subsequent to this declared state of emergency, on March 20, 2020, Governor Northam signed Executive Order 52 (EO 52) providing that notwithstanding the provisions of Article 1.1 of Chapter 4 of Title 32.1 of the Code of Virginia the State Health Commissioner (Commissioner), at his discretion, may authorize any general hospital or nursing home to increase licensed bed capacity as determined necessary by the Commissioner to respond to increased demand for beds resulting from COVID-19. Such beds authorized by the Commissioner under EO 52 would, notwithstanding Virginia Code § 32.1-132, constitute licensed beds that do not require further approval or the issuance of a new license. At the time of this writing, the Virginia Department of Health reports that Virginia has 2,878 cases of COVID-19, the illness caused by the virus, and 54 deaths.¹ To date, the Centers for Disease Control and Prevention has confirmed 330,891 cases in the United States, with 8,910 deaths.²

Per the 2018 data provided by Virginia Health Information and DCOPN records, CPW operates an inventory of 137 licensed skilled nursing beds.

In 2018, the last year for available Virginia Health Information data, DCOPN calculated CPW’s average occupancy to be 79.7%, meaning that during average operations there were 27 vacant beds.

¹ <http://www.vdh.virginia.gov/coronavirus/>

² https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fcases-in-us.html

Request

CPW states that due to the existing COVID-19 crisis, there is a need for additional beds in PD 3 for the treatment of COVID positive patients. CPW further states that a facility with a common management company, Carrington Place at Rural Retreat, has been asked by a hospital to take a resident with a suspected positive COVID-19 diagnosis, however the facility lacks the ability to isolate this patient. CPW states that it is able to immediately receive and properly isolate up to 20 COVID-19 patients and accordingly requests to temporarily add 20 skilled nursing beds to its existing inventory. The beds will be located in space formerly used for skilled care on the second floor that was intended to be used for Assisted Living Memory Care, but has remained empty. The area consists solely of private rooms within an isolated unit totally separate from other areas of the facility. The unit also has its own elevator and entrance. The resulting bed configuration at CPW is shown in **Table 1**.

Table 1: CPW Requested Temporary Bed Inventory

Bed Type	Beds	Requested Additional Beds	Resulting Available Beds
Skilled Nursing	137	20	157

Considerations

In determining whether a need exists for the requested additional bed capacity, the State Health Commissioner established the following factors for consideration, when applicable.

1. Ongoing efforts to increase the availability of existing beds, such as suspension of elective procedures:

As a skilled nursing facility, CPW does not necessarily have the ability to increase the availability of existing beds by, for example, postponing elective procedures. However, as already discussed, the facility does have the ability to immediately accommodate 20 additional beds in a renovated and separate portion of the facility that previously had been used, approved, and licensed for skilled nursing home beds. More importantly, this unit allows for CPW to isolate the patients placed in this ward as it is completely separate from the other parts of the facility and has its own elevator and entrance.

2. The availability of professional and ancillary staff to provide care in the additional beds:

CPW has provided assurances that it currently has the staff necessary to properly staff the additional 20 beds.

3. The availability of medical supplies and personal protection equipment in the facility:

CPW has provided assurances that it currently has access to an adequate supply of personal protection equipment to provide a safe working environment to the staff.

4. The specific plan for increasing bed capacity:

The requested 20 beds will be located in a second floor space that had previously been used, approved, and licensed for skilled nursing home beds. Recently, CPW renovated the space in order to accommodate an Assisted Living Memory Care unit, however the space remains empty. The area consists solely of private rooms within an isolated unit totally separate from other areas of the facility. The space has its own elevator and entrance. This allows CPW to immediately and properly isolate 20 COVID-19 patients.

5. Where the beds will be located and the life safety code considerations of the location:

Because the beds will be located in a portion of the facility that had previously been used, approved, and licensed for skilled nursing home beds, all fire and life safety code requirements will continue to be met.

6. The availability of beds at other community hospitals and nursing homes in the community:

Per the 2018 data provided by Virginia Health Information (VHI) and DCOPN records, there are 255 licensed skilled nursing care beds in PD 3, of which 174 are Medicaid-certified. The overall bed capacity does not inherently take into account the extent to which, due to the rapid rate of infection of COVID-19, how many new cases may arise, and thereby overwhelm the area's capacity to treat patients. A large surge of cases, coupled with inadequate bed capacity, would undoubtedly jeopardize the quality of care for residents of PD 8. CPW's proposal increases their bed capacity by an approximate 15%. More importantly, the location of the proposed additional beds provides CPW with the ability to immediately and properly isolate up to 20 COVID-19 residents, thereby relieving some of the strain sure to be experienced by area hospitals and other nursing homes.

7. Other alternatives to adding bed capacity:

As discussed, given that the applicant has the ability to immediately accommodate up to 20 COVID-19 residents in an isolated ward, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 3, the addition of beds in existing available space is the best option.

8. The current state of COVID-19 in the community:

As previously discussed, at the time of this writing, the Virginia Department of Health reports that Virginia has 2,878 cases of COVID-19, the illness caused by the virus, and 54 deaths.³ To date, the Centers for Disease Control and Prevention has confirmed 330,891 cases in the United States, with 8,910 deaths.⁴ At the time of this writing, there have been 14 reported cases of COVID-19 in the Mount Rodgers Health District and surrounding counties.

DCOPN Findings and Conclusions

CPW proposes to temporarily add 20 skilled nursing beds to its existing inventory. The requested beds would be located in a recently renovated second floor space that was originally intended for Assisted Living Memory Care, but has remained empty. The space was previously used,

³ <http://www.vdh.virginia.gov/coronavirus/>

⁴ https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fcases-in-us.html

approved, and licensed for skilled nursing home beds, and accordingly meets all life safety code requirements. It is important to note that because the space is in a totally separate portion of the facility and has its own entrance and elevator, the requested beds can be used to immediately and properly isolate up to 20 COVID-19 patients. DCOPN finds that, due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, PD 3 has an immediate need to temporarily add additional skilled care nursing facility beds. CPW has demonstrated that the rapid rise in COVID-19 cases has created an emergent need for a temporary increase in bed capacity. In the absence of a temporary increase to bed capacity in the planning district, it is conceivable that the continued rise of COVID-19 cases could overwhelm CPW's and the area's capacity to treat patients and care for residents, thereby jeopardizing the quality of care for residents of PD 3, and limit the ability of health care providers to adequately treat and limit the spread of the virus.

DCOPN Staff Recommendations

The Division of Certificate of Public Need recommends the **approval** of Carrington Place at Wytheville's request to temporarily add 20 skilled nursing beds to its existing inventory. DCOPN's recommendation is based on the following findings:

1. CPW has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, CPW and PD 3 have an immediate need to temporarily add 20 licensed skilled nursing beds.
2. CPW has provided assurances that it currently has the staff necessary to properly staff the additional 20 beds.
3. CPW's plan to expand bed capacity in existing space throughout the facility assures patient safety is maintained from a fire and life safety code perspective.
4. CPW has provided assurances that it currently has an adequate supply of personal protective equipment to provide a safe working environment for its staff.
5. The bed capacity expansion, as proposed by CPW, would allow CPW to immediately and effectively isolate up to 20 COVID-19 patients.