



April 15, 2020

M. Norman Oliver, MD, MA  
State Health Commissioner  
Virginia Department of Health  
109 Governor Street  
Richmond, VA 23219  
[norm.oliver@vdh.virginia.gov](mailto:norm.oliver@vdh.virginia.gov)

Erik Bodin, Director  
Division of Certificate of Public Need  
Virginia Department of Health  
9960 Mayland Drive, Suite 401  
Richmond, Virginia 23233  
[erik.bodin@vdh.virginia.gov](mailto:erik.bodin@vdh.virginia.gov)

Re: **Request pursuant to Executive Order 52 seeking authorization to add 83 beds at Bon Secours DePaul Medical Center, Norfolk, Virginia (Planning District 20)**

Dear Dr. Oliver and Mr. Bodin:

Pursuant to Executive Order 52 issued by Governor Ralph Northam on March 20, 2020 in response to the COVID-19 pandemic situation, Bon Secours DePaul Medical Center (“DePaul”) requests the Commissioner’s authorization to operate 83 temporary additional beds to supplement normal operations to serve the anticipated needs of patients expected during the COVID-19 pandemic emergency.

Here are the details for our request.

<u>Hospital Name:</u>	Bon Secours DePaul Medical Center, LLC 150 Kingsley Lane Norfolk, VA 23505
<u>Hospital License:</u>	H – 1829
<u>Current Approved Capacity:</u>	199 beds - 175 acute and 24 SNF beds
<u>Requested Additional Capacity:</u>	22 ICU beds and 61 medical/surgical beds Total of 282 beds operational – 258 acute and 24 SNF beds

In accordance with CDC and CMS guidance and Governor Northam’s request, DePaul curtailed all non-essential surgery effective March 23, 2020. All predictive analytics models used nationwide show that Virginia and the Hampton Roads area are expected to see a significant increase in hospitalizations related to COVID-19, longer lengths of stays and increased acuity of hospitalized patients for a sustained period of several weeks/months and thus DePaul is preparing for a higher level of need.

#### Additional Beds

At its peak, DePaul was licensed for 366 acute care beds. Over the years, licensed capacity changed through conversion to new services, surrender of beds concurrent with COPN approvals, relocation of beds off campus, etc. Today, DePaul is licensed for 199 beds – 175 acute care and 24 skilled nursing beds.

DePaul already has made plans to reclassify some of its medical/surgical licensed bed capacity to intensive care status. The inpatient beds were historically used to house many short-stay post-surgical patients who

are no longer being treated in those beds due to curtailing of non-emergent and elective inpatient surgical procedures. In addition, many of the current private rooms at DePaul were originally double occupancy, and DePaul is planning to resume double occupancy as necessary during this pandemic in many of these rooms.

Specifically, to meet all the needs anticipated by the COVID-19 patients, DePaul is requesting the addition of 83 acute beds, – 22 ICU and 61 med/surg beds, described below.

- 6 ICU beds in the endoscopy area
- 16 ICU beds in the PACU area
- 11 med/surg beds to be housed in the L&D area, which is currently vacant
- 7 med/surg beds to be housed in the former nursery area, which is currently vacant
- 6 med/surg beds (3 rooms, double occupancy) in the midwifery area, which is currently vacant
- 25 med/surg beds in PreOp/PostOp Phase II areas
- 12 med/surg beds by converting the wound care treatment and holding area

All beds are equipped with all necessary life safety code requirements such as oxygen, medical gases and vacuum capabilities, or portable oxygen, gases and suction can be provided..

#### Staffing

Staff temporarily displaced by the curtailing of non-essential and elective surgery that used to be performed at DePaul will be used to staff the additional intensive care beds and provide care in a safe and effective environment of care. In addition, DePaul is redeploying and cross training additional clinical staff from other elective and outpatient areas to provide patients safe and effective care in the temporary beds. Finally, DePaul and Bon Secours will endeavor to work with members of the Virginia Medical Reserve Corps, if ultimately necessary dependent on the response demanded by a potential surge of COVID-19 positive patients

#### Availability of Medical Supplies and Personal Protective Equipment (“PPE”)

As part of Bon Secours Mercy Health, DePaul works with sister facilities in Hampton Roads, Richmond, and nationwide for access to all necessary medical supplies and PPE. Currently, the hospital is adequately supplied with all necessary medical supplies and PPE. In addition, we have started the reprocessing of N95 masks to ensure we have adequate PPE throughout the duration of our COVID-19 response.

DePaul stands ready to begin to activate this conversion effective the week of April 20, 2020. Please let me know if you need any additional information to evaluate our request. I can also be reached by email at [amy\\_carrier@bshsi.org](mailto:amy_carrier@bshsi.org).

Sincerely,



Amy Ellen F. Carrier  
President , Bon Secours DePaul Medical Center  
President, Bon Secours Hampton Roads

CC: Amy Carrier – Market President, Bon Secours Hampton Roads  
Paul Justice – Assistant General Counsel, Bon Secours Mercy Health  
Elizabeth Breen – Counsel, Hunton Andrews Kurth LLP