

**VIRGINIA DEPARTMENT OF HEALTH**  
**Office of Licensure and Certification**  
**Staff Analysis**

April 10, 2020

**Bon Secours Memorial Regional Medical Center, LLC (4/1/2020)**

Mechanicsville, Virginia

Temporarily add 26 Beds at Bon Secours Memorial Regional Medical Center

**Hospital**

Bon Secours Memorial Regional Medical Center, LLC, (Memorial Regional) is a nonprofit limited liability company. Memorial Regional is located in Planning District (PD) 15, Health Planning Region (HPR) IV.

**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.

According to the 2018 data provided by Virginia Health Information (VHI), Memorial Regional operates an inventory of 225 beds (**Table 1**). Memorial Regional is taking all reasonable efforts to reduce inpatient census to free beds to respond to the COVID-19 crisis, including complying with the March 25, 2020 Order of Public Health Emergency 2.

**Request**

Memorial Regional cites an emergent need to expand bed capacity due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection. Specifically, Memorial Regional requests authorization to temporarily add 26 beds; 6 medical/surgical and 20 ICU. The requested ICU beds will be located in the Memorial Regional ambulatory surgery unit (“ASU”) with all necessary support space used for pre- and post-operative services, as well as a post anesthesia care unit (“PACU”). The ASU is located in a separate part of the hospital from the main surgery suite. Since there is currently very limited surgical caseload being performed in the ASU, it

is available to convert to this temporary use. The PACU and pre/post operative bays in the ASU can be converted into 20 private inpatient intensive care beds. The remaining 6 medical/surgical beds will be located in rooms converted from the existing 6-bed dialysis suite. Patients needing dialysis will receive it in their room instead of being transported to the suite. The resulting bed configuration at Memorial Regional is shown in Table 1.

**Table 1: Memorial Regional Requested Temporary Bed Inventory**

<b>Bed Type</b>	<b>Beds</b>	<b>Requested Additional Beds</b>	<b>Resulting Available Beds</b>
ICU	24	20	44
Med/Surg	185	6	191
Obstetric	16	0	16
<b>Total</b>	<b>225</b>	<b>26</b>	<b>251</b>

**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:**

Memorial Regional has made assurances that, in an effort to free up existing capacity, and in compliance with the March 25, 2020 Order of Public Health Emergency 2, they have suspended all elective procedures that, if delayed, are not anticipated to cause harm to the patient with exceptions and as provided below.

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

Memorial Regional has made assurances that it has the necessary professional staff to provide care in the additional beds. Staff temporarily displaced by the curtailing of non-essential and elective surgery that used to be performed at Memorial Regional will be used to staff the additional intensive care beds and provide care in a safe and effective environment of care.

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

Memorial Regional has made assurances that it has sufficient access to available medical supplies and personal protection equipment in the facility. As part of Bon Secours Mercy Health, Memorial Regional works with sister facilities in Richmond, Hampton Roads, and nationwide for access to all necessary medical supplies and PPE.

**4. The specific plan for increasing bed capacity:**

Memorial Regional requests authorization to temporarily add 26 beds; 6 medical/surgical and 20 ICU. The requested ICU beds will be located in the Memorial Regional ambulatory surgery unit with all necessary support space for pre- and post-operative services as well as a post anesthesia care unit. The ASU is located in a distinct part of the hospital from the main surgery suite. Since there is currently very limited surgical caseload being performed in the ASU, it is available to convert to this temporary use. The PACU and pre/post operative bays in the ASU can be converted into 20 private inpatient intensive care beds. The remaining 6 medical/surgical beds will be located in inpatient rooms converted from the existing 6-bed dialysis suite. Patients needing dialysis will receive it in their room instead of being transported to the suite.

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

Memorial Regional intends to locate the requested ICU beds in the Memorial Regional ambulatory surgery unit. The ASU is located in a distinct part of the hospital from the main surgery suite. The remaining 6 medical/surgical beds will be located in inpatient rooms converted from the existing 6-bed dialysis suite. Patients needing dialysis will receive it in their room instead of being transported to the suite.

**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), there are 3,448 licensed inpatient beds in PD 15. There are 2,449 acute care beds available, of which, 368 are intensive care unit beds. The overall bed capacity data 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 Memorial Regional's and the area's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 15. Memorial Regional's proposal increases their bed capacity by 10.4%, and is a 0.75% increase in bed capacity in the planning district.

**7. Other alternatives to adding bed capacity:**

As discussed, given that Memorial Regional has already provided assurances that they have suspended all of elective procedures, and given the difficulty in anticipating how many cases of COVID-19 may arise in PD 15, the addition of beds in an existing medical care facility space represents the best option.

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

At the time of this writing, the Virginia Department of Health reports that Virginia has 4,509 positive cases of COVID-19, the illness caused by the virus, and 121 deaths.<sup>1</sup> To date, the Centers for Disease Control and Prevention has confirmed 427,460 cases in the United States, with 14,696 deaths.<sup>2</sup> Chickahominy Health District currently has 77 COVID-19 positive patients, with an additional 674 patients in the surrounding jurisdictions.

**Findings and Conclusions**

Memorial Regional requests authorization to temporarily add 26 beds; 6 medical/surgical and 20 ICU. The requested ICU beds will be located in the Memorial Regional ambulatory surgery unit. The ASU is located in a distinct part of the hospital from the main surgery suite. The remaining 6 medical/surgical beds will be located in inpatient rooms converted from the existing 6-bed dialysis suite. Patients needing dialysis will receive it in their room instead of being transported to the suite. Memorial Regional 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 the hospital's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 15, and limit the ability of health care providers adequately treat and limit the spread of the virus.

**Staff Recommendations**

The Division of Certificate of Public Need recommends the **approval** of Bon Secours Memorial Regional Medical Center, LLC's request to temporarily add 26 beds at Bon Secours Memorial Regional Medical Center. This staff recommendation is based on the following findings.

1. Memorial Regional has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, Memorial Regional has an immediate need to temporarily add 26 licensed inpatient beds.
2. Memorial Regional's plan for training and shifting ambulatory staff is a reasonable solution for staffing the additional beds.
3. Memorial Regional's plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis.
4. Memorial Regional's plan to expand bed capacity in existing hospital space throughout the campus assures patient safety is maintained from a fire and life safety code perspective.

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

<sup>2</sup> [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](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)