

# VIRGINIA DEPARTMENT OF HEALTH

## Office of Licensure and Certification

### Staff Analysis

April 23, 2020

#### **Bon Secours Memorial Regional Medical Center, LLC (4/22/2020)**

Bon Secours Memorial Regional Medical Center  
Mechanicsville, Virginia

Temporarily Add an Additional 35 Intensive Care Unit Beds and 50 Medical/Surgical Beds at Bon Secours Memorial Regional Medical Center

#### **Hospital**

Bon Secours Memorial Regional Medical Center, LLC, (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.

On April 13, 2020, the State Health Commissioner authorized Memorial Regional to temporarily add 26 additional beds to its inventory in response to the COVID-19 crisis.

#### **Request**

Memorial Regional cites an emergent need to expand bed capacity due to the anticipated sudden and overwhelming increase in acute care cases resulting from COVID-19 infection. Specifically, Memorial Regional requests authorization to temporarily add an additional 85 inpatient beds,

consisting of 35 intensive care unit (ICU) beds and 50 medical/surgical beds. The requested beds will be located in areas of the existing facility currently used for patient service. 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>Additional Beds Authorized 4/14/20</b>	<b>Requested Additional Beds</b>	<b>Resulting Available Beds</b>
ICU	24	20	35	79
Med/Surg	185	6	50	241
Obstetric	16	0	0	16
<b>Total</b>	<b>225</b>	<b>26</b>	<b>85</b>	<b>336</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.

**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 in the existing departments will be used for the additional ICU and medical/surgical beds. Memorial Regional and Bon Secours are also planning to use other clinical staff redeployed from outpatient departments of the hospital and other outpatient locations in the community which have temporarily closed or where operations have been severely curtailed. Cross training programs have been developed and staff is already being trained and oriented to potential new roles. Finally, Memorial Regional states that it will endeavor to work with members of the Virginia Medical Reserve Corps if ultimately necessary.

**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 another 85 inpatient beds; 35 ICU beds and 50 medical/surgical beds. To facilitate the expansion, twenty-five PACU and Pre-Op areas in the main surgical suite will be converted to ICU beds. Ten bays in the emergency department on the campus will convert into ten ICU beds. The cardiac catheterization lab holding area and the endoscopy area will be converted into fifteen step-down medical/surgical beds. Obstetrical services will be temporarily suspended at Memorial Regional and consolidated at Bon Secours St. Mary's Hospital—as a result, the labor and delivery and post-partum area will be converted into twenty-nine medical/surgical beds. Finally, another six rooms in the ambulatory surgery unit will be converted to medical/surgical beds.

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

Memorial Regional proposes to locate the requested beds in existing areas of the hospital currently used for patient service. Accordingly, all 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), there are 3,448 licensed inpatient beds in PD 15, of which 368 are ICU beds. An additional 610 additional beds have already been authorized in PD 15 under the authority of Executive Order 52. 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 supplemental proposal increases their normal bed capacity by 37.8%, and is a 2.5% increase in the standing bed capacity in the planning district. More importantly, Memorial Regional's proposal increases its standing ICU inventory by 145.8% and PD 15's ICU inventory by 9.5%.

**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, as well as 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 10,998 positive cases of COVID-19, the illness caused by the virus, and 372 deaths.<sup>1</sup> To date, the Centers for Disease Control and Prevention has confirmed 802,583 cases in the United States, with 44,575 deaths.<sup>2</sup> Chickahominy Health District currently has 194 confirmed cases, with an additional 1,388 confirmed cases in surrounding PD 15 jurisdictions.

### **Findings and Conclusions**

Memorial Regional requests authorization to temporarily add another 85 inpatient beds; 35 ICU beds and 50 medical/surgical beds. To facilitate the expansion, twenty-five PACU and Pre-Op areas will be converted to ICU beds, ten bays in the emergency department will convert into ICU beds, the cardiac catheterization lab holding area and the endoscopy area will be converted into fifteen step-town medical/surgical beds, the labor and delivery and post-partum area will be converted into twenty-nine medical/surgical beds, and six rooms in the ambulatory surgery unit will be converted to medical/surgical beds. Memorial Regional has demonstrated that the anticipated 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 35 intensive care unit beds and 50 medical/surgical beds at Bon Secours 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 35 intensive care unit beds and 50 medical/surgical 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.

---

<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)