



April 22, 2020

M. Norman Oliver, MD, MA
State Health Commissioner
Virginia Department of Health
109 Governor Street
Richmond, VA 23219
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

Re: Second Request pursuant to Executive Order 52 seeking authorization to add 100 more beds to the 19 already authorized at Bon Secours St. Mary's Hospital, Richmond, Virginia (Planning District 15)

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 St. Mary's Hospital ("St. Mary's") is thankful to the State Health Commissioner and DCOPN for the authorization, issued earlier this week on April 13, 2020, to operate 19 temporary additional beds.

However, in light of the fact that plans for an Alternate Care Facility ("ACF") to serve the needs of the greater Richmond population are unlikely to materialize within the timeframe predicted for peak patient volumes, St. Mary's had to go back and evaluate additional locations for beds that may be required to meet the surge needs of COVID-19 and non-COVID-19 patients at our facility. As a result, St. Mary's is again seeking authorization from State Health Commissioner to operate another 100 temporary additional beds to provide surge capacity and supplement operations to serve the anticipated needs of patients expected during the COVID-19 pandemic emergency.

<u>Hospital Name:</u>	Bon Secours St. Mary's Hospital of Richmond, LLC 5801 Bremo Rd Richmond, VA 23226
<u>Hospital License:</u>	H – 1833
<u>Current Approved Capacity:</u>	391 beds 19 additional temporary beds authorized on April 13, 2020
<u>Requested Additional Capacity:</u>	100 additional beds – 66 intensive care and 34 medical/surgical beds Total of 510 beds operational

In accordance with CDC and CMS guidance and Governor Northam's request, St. Mary's curtailed all non-essential surgery effective March 23, 2020. All predictive analytics models used nationwide show that Virginia and the Richmond area are expected to see a significant increase in hospitalizations related to COVID-19, longer lengths of stays and increased acuity of hospitalized patients and thus St. Mary's is preparing for a higher level of need that will now not be met through an ACF. St. Mary's has already made plans to temporarily reclassify its pediatric ICU and medical/surgical beds to accommodate adult patients. This is not impacting the overall licensed capacity at St. Mary's.

Intensive Care Beds

The 66 new intensive care beds would be located in the following locations and are equipped with necessary life safety code requirements such as oxygen, medical gases and vacuum capabilities for safe and effective patient care.

- the PACU and pre-op area of the main surgery area will be converted into 27 ICU beds
- the endoscopy area will be converted into 9 ICU beds
- the pediatric emergency department within the main St. Mary's Emergency Department would convert its bays into 15 adult ICU beds
- the Bon Secours Short Pump Emergency Center, located a few miles away in Henrico, would convert its bays into 15 ICU beds and would temporarily cease operating as a freestanding emergency department

Please note that the different options will be phased in, as needed. If any site of care should change its scope of service (e.g. a freestanding emergency department no longer accepting walk-in or ambulance-transported patients), St. Mary's would communicate this change directly and publicly with all impacted groups – EMS, first responders, patients, and community at large.

Medical/Surgical Beds

The 34 new medical/surgical beds would be located in the following locations:

- 3 rooms in the cardiovascular surgery area
- conversion of 9 rooms on 2N to double occupancy
- conversion of 6 rooms on 5E to double occupancy
- conversion of the 16 beds in the Bon Secours Community Hospice House, located at 1133 Old Bon Air Rd, in Richmond, VA 23325, into medical/surgical beds for palliative care patients.

Staff in the existing outpatient and emergency departments will be used to staff the additional beds and provide care in a safe and effective environment of care. St. Mary's 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 either 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, St. Mary's 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, St. Mary's works with sister facilities in Richmond, Hampton Roads, and nationwide for access to all necessary medical supplies and PPE. Currently, the hospital is adequately supplied with medical supplies and PPE and we have rolled out re-processing process for N-95 masks.

St. Mary's stands ready to begin to activate this conversion effective the week of April 27. Please let me know if you need any additional information to evaluate our request.

Sincerely,



Kevin Sheppard
Interim President

CC: Yousuf Faraaz – Market President, Bon Secours Richmond
Alexander Brown – Associate General Counsel, Bon Secours Mercy Health
Elizabeth Breen – Counsel, Hunton Andrews Kurth LLP