



April 3, 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: **Request pursuant to Executive Order 52 seeking authorization to add 19 beds
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") requests the Commissioner's authorization to operate 19 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 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
<u>Requested Additional Capacity:</u>	19 intensive care beds Total of 410 beds operational

In accordance with CDC and CMS guidance and Governor Northam's request, St. Mary's curtailed all non-essential inpatient and outpatient surgery effective March 23, 2020. As a result, hospital space is available for immediate use in response to the novel coronavirus threat.

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, and especially the utilization of intensive care beds and the significantly longer lengths of stay associated with those episodes of care. As a result, St. Mary's is preparing for this eventuality and redeploying its capacity.

Specifically, described below are the details of our request and the space in which the new beds would operate.

Intensive Care Beds

St. Mary's already has made plans to reclassify some of its medical/surgical beds to intensive care status. The beds are located throughout the hospital, in a variety of current inpatient medical/surgical units. The inpatient beds were historically used to house many short-stay post-surgical patients such as joint replacement patients, pediatrics surgery, general surgery patients, etc. who are no longer being treated in those beds due to curtailing of non-emergent and elective inpatient surgical procedures. As existing inpatient medical/surgical patient rooms, the "new" ICU beds are equipped with all necessary life safety code requirements such as oxygen, medical gases and vacuum capabilities. St. Mary's is also prepared to reclassify 5 of its telemetry beds to intensive care use

This temporary reclassification of beds from medical/surgical to intensive care does not add to the licensed inventory at St. Mary's. However, we do anticipate the average length of stay of patients in those ICU beds to be significantly longer than the historical length of stay of patients in those beds, St. Mary's is preparing for this eventuality by shifting the intensity of care. As a result, St. Mary's would also like to request the addition of 19 intensive care beds to the license.

St. Mary's operates an ambulatory surgery unit ("ASU") on the 7th floor of the hospital with all necessary support space for pre- and post-operative services as well as a post anesthesia care unit ("PACU"). The ASU is located in a distinct part of the hospital from the main surgery suite which is on the first floor. Since there is currently no 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 19 inpatient intensive care beds, some in double occupancy suites. These temporary beds are all equipped with oxygen, medical gases and vacuum capabilities, and are monitored.

Staff temporarily displaced by the curtailing of non-essential and elective surgery that used to be performed at St. Mary's and used to spend their inpatient stay in the now vacant inpatient beds, will be used to staff the additional intensive care beds and provide care in a safe and effective environment of care.

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 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.

St. Mary's stands ready to activate this conversion effective the week of April 5, 2020. 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