

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

April 10, 2020

**Carilion Franklin Memorial Hospital (3/27/2020)**

Rocky Mount, Virginia

Temporarily add 8 Beds on the Carilion Franklin Memorial Hospital Campus

**Hospital**

Carilion Franklin Memorial Hospital (CFMH) is a not-for-profit 501(c)(3) corporation located in Rocky Mount, Virginia. CFMH is a wholly owned subsidiary of Carilion Clinic. Carilion Clinic is a not-for-profit 501(c)(3) corporation headquartered in Roanoke, Virginia. CFMH is located in Planning District (PD) 12, Health Planning region (HPR) III.

**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), CFMH operates an inventory of 37 licensed beds (**Table 1**). CFMH 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**

CFMH cites an emergent need to expand bed capacity due to an influx of patients and increased bed utilization resulting from COVID-19 infection. CFMH asserts that prior to the escalating pandemic, it was operating at more than 90% adult capacity, partially due to treatment of the seasonal flu. CFMH anticipates that it will have a bed shortage in the immediate future if the proposed bed addition is not approved. Therefore, CFMH requests authorization to temporarily add eight medical/surgical level of care beds. The requested beds would be added on the CFMH campus located at 390 South Main Street, Rocky Mount, Virginia by converting space in the

existing post-anesthesia care unit (PACU) to eight private inpatient rooms. The resulting bed configuration at CFMH is shown in **Table 1**.

**Table 1: CFMH Requested Temporary Bed Inventory**

<b>Bed Type</b>	<b>Existing Beds</b>	<b>Requested Additional Beds</b>	<b>Resulting Available Beds</b>
ICU	33	0	33
Medical/Surgical	4	8	12
<b>Total</b>	<b>37</b>	<b>8</b>	<b>45</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:**

CFMH 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, it has canceled all non-essential procedures and surgeries and published significant public notices and messaging regarding appropriate use of the emergency department.

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

CFMH asserts that it has in place a plan to make available the necessary professional staff to provide care in the additional beds. CFMH's staffing needs are coordinated through the onsite hospital incident command team and the Carilion Clinic staffing branch incident command team. The Carilion facilities that have low patient volumes have reported their available staffing resources to the teams overseeing staffing needs. Additionally, the Carilion Clinic staffing branch incident command team will provide educational competencies and orientation for staff assigned to the requested additional beds.

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

CFMH has made assurances that it has sufficient access to available medical supplies and personal protection equipment in the facility and that the Carilion incident command team is supporting supply requirements of CFMH. The VDMAC has suggested moving toward the adoption of crisis standards of care to, in part, preserve available supplies.

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

CFMH intends to add the beds on its campus located at 390 South Main Street, Rocky Mount, Virginia. To implement the proposed bed addition, CFMH will convert space in the existing PACU to eight private inpatient rooms.

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

CFMH will locate the requested beds in the PACU area and has confirmed that all eight rooms are equipped with vital sign monitors, wall oxygen and suction, patient call bells and Alaris IV pumps. Additionally, CFMH asserts that the proposed location of the beds meets the requirements of NFPA 101-2012 for a smoke compartment; the location does not exceed 22,500 square feet; and travel distance does not exceed 200 feet to an exit. Furthermore, CFMH is protected throughout by an approved electrically supervised sprinkler system. Finally, while the smoke compartment is considered non-sleeping, the proposed rooms are within a suite, which is separated by at least a smoke partition and under direct visual supervision of the nurses' station. To the extent that the proposed bed addition does not strictly comply with the architectural and design requirements in 12 VAC 5-410-650, CFMH requests a temporary variance in accordance with 12 VAC 5-410-30.

**6. The availability of beds at other community hospitals and nursing homes in the community:**

Per the 2018 data provided by VHI, there are 507 licensed inpatient beds in PD 12, including 39 intensive care unit beds and 386 medical/surgical 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 CFMH's and the area's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 12. CFMH's proposal increases its bed capacity by 22% and increases PD 12's bed capacity by 1.6%.

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

As discussed, given that CFMH has already provided assurances that it has suspended all of elective procedures, and the anticipated bed capacity shortages at other facilities in PD 12, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 12, there are no alternatives to the requested temporary addition of bed capacity.

**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> At the time of this writing, there are 18 COVID-19 positive

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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)

patients in the West Piedmont Health District, with another 49 cases in the surrounding jurisdictions.

### **Findings and Conclusions**

CFMH proposes to temporarily add eight beds in the existing PACU on the CFMH campus in Rocky Mount, Virginia. The Division of Certificate of Public Need (DCOPN) finds that, due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, that CFMH has an immediate need to temporarily add eight beds. CFMH 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 12, 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 Carilion Franklin Memorial Hospital's request to temporarily add eight beds on its campus. This staff recommendation is based on the following findings.

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