

VIRGINIA DEPARTMENT OF HEALTH

Office of Licensure and Certification

Staff Analysis

April 13, 2020

Carilion Giles Community Hospital (3/30/2020)

Pearisburg, Virginia

Temporarily add 14 Beds at Carilion Giles Community Hospital

Hospital

Carilion Giles Community Hospital (“CGCH”) is a Virginia nonstock corporation that operates a critical access hospital located in Pearisburg, Virginia. CGCH is a wholly owned subsidiary of Carilion Clinic, which is a 501(c)(3) Virginia nonstock corporation located in Roanoke, Virginia. CGCH is located in Health Planning Region (“HPR”) III, Planning District (“PD”) 4.

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. At the time of this writing, the Virginia Department of Health reports that Virginia has 1,020 cases of COVID-19, the illness caused by the virus, and 25 deaths.¹

Per the 2018 data provided by Virginia Health Information (“VHI”), CGCH operates an inventory of 25 licensed beds (**Table 1**). CGCH 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

CGCH 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, CGCH requests authorization to add temporarily 14 beds. CGCH currently projects the need for an additional 14 medical/surgical beds that will operate as progressive care unit (“PCU”) beds. The requested beds

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

will be added to the outpatient area and the post-anesthesia care unit area. The resulting bed configuration is at CGCH is shown in **Table 1**. In conjunction with this request, CGCH has notified CMS that it intends to operate under a blanket Section 1135 Waiver, which allows critical access hospitals to operate more than 25 licensed beds and exceed a 96-hour average length of stay during the coronavirus pandemic.

Table 1: CGCH Requested Temporary Bed Inventory

Bed Type	Beds	Requested Additional Beds	Resulting Available Beds
Medical/Surgical	21	14	35
ICU	4	0	4
Total/Average	25	14	39

Source: VHI

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:

CGCH 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 cancelled all non-essential procedures and surgeries. Moreover, the hospital has published significant public notices and messaging regarding the appropriate use of the Emergency Department during the coronavirus pandemic.

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

CGCH states that staffing is being coordinated and directed by onsite Hospital incident command team and the Carilion System Staffing Branch incident command team, which is led by the Chief Nursing Officer. Hospital and Carilion Health System departments that have experienced low or no patient volumes have reported their staffing resources to the staffing branch. Educational competencies and orientations to staff the proposed beds will be addressed by the Staffing branch and Hospital incident command. This redeployment of staff will be made possible, in part, by the decision by CGCH to cancel all non-essential procedures and surgeries

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

All PPE and supply needs are being monitored and routinely communicated with the incident command team from the logistics branch of the Carilion incident command team. This branch is supporting supply requirements of CGCH.

4. The specific plan for increasing bed capacity:

CGCH intends to add an additional 14 medical/surgical beds that will operate as progressive care unit beds. Nine beds will be placed within the outpatient area and five beds will be placed in the PACU area. In both cases, the space in the areas will be converted into private rooms for the new beds, which will receive PCU level care.

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

The requested beds will be added to the outpatient and PACU areas of the hospital. CGCH will convert space in the areas into private rooms. CGCH asserts that the beds satisfy the life safety code requirements.

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

Per the 2018 data provided by VHI, there are 464 licensed inpatient beds in PD 4, of which 354 are medical surgical beds and 36 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 CGCH's and the area's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 4. CGCH's proposal increases their bed capacity by 56% and is a 3% increase in bed capacity in the planning district.

7. Other alternatives to adding bed capacity:

As discussed, given that the hospital 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 4, this use of existing space within the hospital to create private rooms for isolation, monitoring, and treatment of COVID-19 patients 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 5,747 cases of COVID-19, the illness caused by the virus and 149 deaths.² To date, the Centers for Disease Control and Prevention has confirmed 525,704 cases in the United States, with

² <http://www.vdh.virginia.gov/coronavirus/>

20,486 deaths.³ The New River Health District currently reports 42 COVID-19 patients with 41 cases in the surrounding jurisdictions.

Findings and Conclusions

CGCH proposes to add temporarily 14 beds. These beds will be added to the outpatient and PACU areas of the hospital. 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 CGCH has an immediate need to temporarily add 14 beds. Furthermore, DCOPN finds that CGCH's plan for training and shifting staff is a reasonable solution for staffing the requested beds. Additionally, DCOPN concludes that CGCH's plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis. Moreover, DCOPN finds that CGCH's plan to expand bed capacity in existing hospital space assures patient safety is maintained from a fire and life safety code perspective. Finally, DCOPN finds that 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 4, and limit the ability of health care providers adequately treat and limit the spread of the virus.

Staff Recommendations

The staff recommends the **approval** of Carilion Giles Community Hospital's request to temporarily add 14 beds at Carilion Giles Community Hospital. The staff recommendation is based on the following findings.

1. CGCH has demonstrated that, due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection, CGHC has an immediate need to temporarily add 14 beds.
2. CGCH's plan for training and shifting staff is a reasonable solution for staffing the requested beds.
3. CGCH's plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis.
4. CGCH's plan to expand bed capacity in existing hospital space assures patient safety is maintained from a fire and life safety code perspective.

³ 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