

VIRGINIA DEPARTMENT OF HEALTH
Office of Licensure and Certification
Staff Analysis

April 8, 2020

Carilion Medical Center d/b/a Carilion Roanoke Memorial Hospital

Roanoke, Virginia

Temporarily add 54 medical/surgical beds and 20 intensive care unit beds in response to COVID-19 at Carilion Roanoke Memorial Hospital

Hospital

Carilion Medical Center (CMC) is a wholly-owned subsidiary of Carilion Clinic. Carilion Clinic is a not-for-profit 501(c)(3) corporation headquartered in Roanoke, Virginia. Carilion Medical Center is a legal entity that includes two acute care hospitals, Carilion Roanoke Memorial Hospital (Roanoke Memorial) and Carilion Roanoke Community Hospital. Roanoke Memorial is located in Planning District (PD) 5, 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.

Per the 2018 data provided by Virginia Health Information and the Office of Licensure and Certification, Roanoke Memorial operates an inventory of 703 licensed inpatient beds.

Request

Roanoke Memorial cites an emergent need to expand licensed bed capacity due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection. Specifically, Roanoke Memorial requests authorization to temporarily add 54 medical/surgical beds and 20 intensive care unit (ICU) beds. To expand bed capacity, Roanoke Memorial proposes to add 10 ICU beds on the fifth floor of the East Pavilion, 27 medical/surgical beds in the outpatient surgery area on the fourth floor of the West Pavilion, 10 ICU beds on the sixth floor of the Mountain Pavilion, 27 medical/surgical beds in the former patient care areas on the sixth, eighth, and ninth floors of the East Pavilion, and 27 medical/surgical beds added in former patient care areas in the East Pavilion. The resulting bed configuration at Roanoke Memorial is shown in Table 1.

Table 1. Roanoke Memorial Requested Temporary Bed Inventory

Bed Type	Existing Beds	Requested Additional Beds	Resulting Available Beds
Adult ICU	91	20	111
Medical/Surgical	470	54	524
Obstetric	59	0	59
Pediatric	24	0	24
Pediatric ICU	8	0	8
Adult Psychiatric	35	0	35
Child Psychiatric	16	0	16
TOTAL	703	74	777

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:

Roanoke Memorial has made assurances that in advance of the anticipated additional influx of patients, 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. At the same time, Roanoke Memorial published significant public notices and messaging regarding appropriate use of the Emergency Department. Further, regional Emergency Medical Services revised protocols for non-transport of suspected COVID-19 patients.

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

Roanoke Memorial has made assurances that it has the necessary professional staff to provide care in the additional beds. Specifically, staffing for the additional licensed beds will be coordinated and directed by an onsite CMC incident command team and the Carilion System Staffing Branch incident command team, led by the Chief Nursing Officer. CMC and Carilion Departments that have experienced low or no patient volumes have reported their staffing resources to the staffing branch. Educational competencies and orientations to staff in the new licensed bed area will be addressed by this staffing branch and CMC incident command. These areas will also have access to the code blue staff and assistance team. Finally, CMC Incident Command and the Operations Branch of the Carilion Clinic incident command team have been tasked with ensuring that operational and care management needs are fully addressed. DCOPN again notes that Roanoke Community has suspended all elective procedures in compliance with the Order of Public Health Emergency 2.

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

Roanoke Memorial states that all personal protection equipment and supply logistics are being carefully 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 CMC. 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:

To expand bed capacity, Roanoke Memorial proposes to add 10 ICU beds on the fifth floor of the East Pavilion, 27 medical/surgical beds in the outpatient surgery area on the fourth floor of the West Pavilion, 10 ICU beds on the sixth floor of the Mountain Pavilion, 27 medical/surgical beds in the former patient care areas on the sixth, eighth, and ninth floors of the East Pavilion, and 27 medical/surgical beds added in former patient care areas in the East Pavilion.

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

The proposed additional beds will be located on the fifth, sixth, eighth, and ninth floors of the East Pavilion, the fourth floor of the West Pavilion, and the sixth floor of the Mountain Pavilion. Certain, but not all areas that will include the additional beds lack a nurse call system, private restroom, oxygen supply, vacuum, or medical air. To the extent the proposed bed addition does not strictly comply with the architectural and design requirements set forth at 12VAC5-410-650, Roanoke Memorial will seek a temporary variance in accordance with 12VAC5-410-30. The licensure variance will be addressed separately.

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

Per the 2018 data provided by Virginia Health Information, there are 1,448 licensed inpatient acute care beds in PD 5, of which 924 are medical/surgical beds and 153 are intensive care unit (ICU) 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 Roanoke Memorial's and the area's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 5. Roanoke Memorial's proposal increases their bed capacity by approximately 10% and is an approximate 5% increase in bed capacity in the planning district. More importantly, because Roanoke Memorial proposes to add ICU beds, the request represents an approximate 13% increase in available intensive care beds in PD 5, from 153 to 173 ICU beds.

7. Other alternatives to adding bed capacity:

As discussed, given that the applicant has already provided assurances that they have suspended all elective procedures, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 5, the addition of beds in already existing space is the best option. Roanoke Memorial is part of a hospital system and their addition of licensed bed capacity is a part of the system's overall response to the need for additional 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 3,645 cases of COVID-19, the illness caused by the virus, and 75 deaths.¹ To date, the Centers for

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

Disease Control and Prevention has confirmed 374,329 cases in the United States, with 12,064 deaths.² With respect to the area to be served, there have been 48 COVID-19 cases in the Roanoke, Salem and Alleghany Health Districts.

DCOPN Findings and Conclusions

Roanoke Memorial proposes to temporarily add 54 medical/surgical beds and 20 ICU beds to its existing inventory in response to the COVID-19 pandemic. These beds will be added in various wings of the existing facility, with some beds being located in rooms previously, but no longer used for patient care. DCOPN finds that, due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, that Roanoke Memorial has an immediate need to temporarily add the 74 requested beds. Roanoke Memorial 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 5. This would undoubtedly result in health care providers' inability to adequately treat and limit the spread of the virus.

DCOPN Staff Recommendations

The Division of Certificate of Public Need recommends the **approval** of Carilion Roanoke Memorial Hospital's request to temporarily add 54 medical/surgical and 20 intensive care beds to its existing inventory. DCOPN's recommendation is based on the following findings.

1. Roanoke Memorial has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, Roanoke Memorial has an immediate need to temporarily add 54 medical/surgical beds and 20 ICU beds.
2. Roanoke Memorial's plan for training and shifting existing staff is a reasonable solution for staffing the additional beds.
3. Roanoke Memorial's plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis.
4. Roanoke Memorial's plan to expand bed capacity in existing hospital space throughout the facility, while seeking a variance in accordance with 12 VAC5-410-30 where necessary, assures patient safety is maintained from a fire and life safety code perspective.

² 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