

VIRGINIA DEPARTMENT OF HEALTH
Office of Licensure and Certification
Staff Analysis

April 17, 2020

Botetourt Health Care, LLC d/b/a Carrington Place at Botetourt (4/8/2020)

Daleville, Virginia

Temporarily add 22 skilled nursing beds at Carrington Place at Botetourt

Nursing Home

Botetourt Health Care, LLC, doing business as Carrington Place at Botetourt (CPB), is located in Daleville, Virginia 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.

According to the 2018 data provided by Virginia Health Information (VHI) and DCOPN records, CPB operates an inventory of 90 licensed skilled nursing beds (**Table 1**).

Request

CPB proposes to temporarily add 22 skilled nursing beds to its existing inventory. The requested beds would be added on in a newly built (2017) assisted living facility (Carrington Cottage) located directly next door to the skilled nursing facility located at 290 Commons Parkway, Daleville, Virginia. The space is currently vacant and ready for immediate occupancy. The resulting bed configuration at CPB is shown in **Table 1**.

Table 1: CPB Requested Temporary Bed Inventory

Bed Type	Beds	Requested Additional Beds	Resulting Available Beds
Skilled Nursing	90	22	112

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:

As a skilled nursing facility, CPB does not necessarily have the ability to increase the availability of existing beds by, for example, postponing elective procedures. However, as already discussed, the facility does have the ability to immediately accommodate 22 additional skilled nursing beds by moving lower acuity patients next door to its assisted living facility, thereby relieving some of the strain currently experienced by area facilities treating higher acuity and COVID-19-positive patients. This plan is consistent with the advice provided by the American Health Care Association and the National Center for Assisted Living, who recommended that, “ALs should consider accepting less acute, non-COVID-19 patients from other medical facilities (skilled nursing centers, LTACHs, etc.) in order to create more room at higher acuity facilities currently equipped to assist COVID-19 positive individuals.”¹

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

CPB has provided assurances that it currently has the staff necessary to properly staff the additional 22 beds.

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

CPB has provided assurances that it currently has access to an adequate supply of personal protection equipment to provide a safe working environment for its staff. Additionally, 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:

As discussed, the additional beds will be located in a recently built assisted living facility located directly next door to the skilled nursing facility. In order to accommodate the expansion, CPB will move lower acuity residents from the nursing home into empty and appropriate beds located at the assisted living facility. This will open more skilled nursing home beds by accepting lower acuity, non-COVID-19 residents into unused assisted living beds.

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

As discussed, the requested beds will be located in a space currently licensed as an assisted living facility. As such, the area currently meets, and will continue to meet, all fire and life safety code requirements for skilled nursing home residents.

¹ https://www.ahcancal.org/facility_operations/disaster_planning/Documents/Cohorting.pdf

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

Per the 2018 data provided by VHI, there are 2,455 licensed skilled nursing care beds in PD 5, of which 2,313 are Medicaid-certified. The overall bed capacity 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 the area's capacity to treat patients and residents, thereby jeopardizing the quality of care for residents of PD 5. CPB's proposal increases its bed capacity by 24%. More importantly, CPB's proposal allows it to immediately accommodate 22 additional lower acuity residents, thereby helping to alleviate some of the strain currently experienced by area facilities treating higher acuity and COVID-19-positive residents.

7. Other alternatives to adding bed capacity:

Given the anticipated bed capacity shortages at other facilities in PD 5, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 5, 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 7,491 cases of COVID-19, the illness caused by the virus, and 231 deaths.² To date, the Centers for Disease Control and Prevention has confirmed 632,548 cases in the United States, with 31,071 deaths.³ At the time of this writing, there were 56 cases of COVID-19 positive patients in Alleghany Health District, with another 105 patients in the surrounding jurisdictions.

Additional Information

Dr. Laurie Forlano, Deputy Commissioner for Population Health and head of the Long Term Care Task Force responding to the pandemic, reviewed the request and determined the request to be consistent with the goal to expand bed capacity in long term care settings in order to create and increase appropriate spaces for the care of higher acuity individuals. Dr. Forlano recommends that CPB follow the nursing homes preparedness checklist, available at https://www.cdc.gov/coronavirus/2019-ncov/downloads/novel-coronavirus-2019-Nursing-Homes-Preparedness-Checklist_3_13.pdf. The checklist identifies key areas that long-term care facilities should consider in their COVID-19 planning. Long-term care facilities can use this tool to self-assess the strengths and weaknesses of current preparedness efforts. Additional information is provided via links to websites throughout the document. However, it will be necessary to actively obtain information from state, local, tribal, and territorial resources to ensure that the facility's plan complements other community and regional planning efforts. This checklist does not describe mandatory requirements or standards;

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

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

rather, it highlights important areas to review to prepare for the possibility of residents with COVID-19.

Findings and Conclusions

Carrington Place at Botetourt proposes to temporarily add 22 skilled nursing beds to its existing inventory. The additional beds will be located in a newly built assisted living facility located directly next door to the skilled nursing facility. In order to accommodate the expansion, CPB will move lower acuity residents from the nursing home into empty and appropriate beds located at the assisted living facility. This will open more skilled nursing beds by accepting lower acuity, non-COVID-19 residents into unused assisted living beds, thereby helping to alleviate the strain currently experienced by area facilities providing care to higher acuity and COVID-19-positive patients. DCOPN finds that, due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, Carrington Place at Botetourt has an immediate need to temporarily add 22 additional beds. 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 area's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 5, and limit the ability of health care providers to adequately treat and limit the spread of the virus.

Staff Recommendation

This staff report recommends the **approval** of Carrington Place at Botetourt's request to temporarily add 22 skilled nursing beds to its existing inventory. The staff recommendation is based on the following findings:

1. CPB has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, CPB and PD 5 have an immediate need to temporarily add 22 licensed skilled nursing beds.
2. CPB has provided assurances that it currently has the staff necessary to properly staff the additional 22 beds.
3. CPB's plan to expand bed capacity in existing space throughout the facility assures patient safety is maintained from a fire and life safety code perspective.
4. CPB has provided assurances that it currently has an adequate supply of personal protective equipment to provide a safe working environment for its staff.
5. The bed capacity expansion, as proposed by CPB, would allow CPB to immediately accommodate an additional 22 lower acuity patients, thereby helping to alleviate the strain currently experienced by area facilities providing care to higher acuity and COVID-19-positive patients.
6. The request is consistent with the Long Term Care Task Force's goal to expand bed capacity in long term care settings.