Health Systems Agency of Northern Virginia

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April 1, 2020

Erik Bodin, Director, DCOPN

Office of Licensure and Certification

Virginia Department of Health

9960 Mayland Drive, Suite 401

Richmond, VA 23233-1463

Dear Mr. Bodin:

Health Systems Agency of Northern Virginia (HSANV) staff has reviewed the March 31, 2020 requests from Novant Health UVA Health System (Novant) to expand temporarily the licensed hospital bed capacity of Novant Health UVA Health System Prince William Medical Center (NHUVA PWMC), Novant Health UVA Haymarket Medical Center (NHUVA HMC), and Novant Health UVA Culpeper Medical Center (NHUVA CMC) as contemplated and permitted by Executive Order 52.[[1]](#footnote-1)

Novant Health UVA Health System operates three acute care community hospitals in Virginia, two in Northern Virginia (PD 8) and one in Northwest Virginia (PD 9). Two of these facilities, Novant Health UVA Health System Prince William Medical Center and Novant Health UVA Haymarket Medical Center, are located in western Prince William County. The primary service areas of NHUVA PWMC and NHUVA HMC overlap substantially. Novant Health UVA Culpeper Medical Center is in Culpeper, Virginia, about 40 miles southwest of Novant’s Prince William County facilities.

Novant Health UVA Health System hospitals were licensed to operate 260 acute care beds in 2018, 153 of which were adult medical-surgical beds and 25 were intensive care (ICU) beds.[[2]](#footnote-2) Novant proposes to add a total of 106 beds, 22 intensive care beds and 84 adult medical-surgical beds, under the provisions of Executive Order 52. The proposed aggregate (three hospitals) increase in Novant hospital bed capacity is about 41%.

Novant’s requests are responsive to the intent and purpose of Executive Order 52. Among other considerations, the capacity changes proposed at Novant hospitals:

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* Relate directly to the objectives and provisions of Executive Order 52. The requests submitted are for temporary increases in adult medical-surgical beds and intensive care beds. The individual hospital requests provide the information specified in the Commissioner of Health’s March 24, 2020 letter providing guidance to Virginia hospital and nursing home administrators in applying for temporary bed increases.
* Collectively, the three requests cover all Novant hospitals in Virginia. They take advantage of space and capabilities in each facility that with relatively modest adjustments will permit more effective and efficient use of existing clinical space under exigent circumstances.[[3]](#footnote-3)
* Call for what appear to be economically rational changes, e.g., recapturing medical-surgical bed space vacated or reserved as part of campus renovation and modernization projects, and consolidating inpatient obstetrics capacity at NHUVA PWMC to permit the addition of a substantial number of medical-surgical beds at NHUVA HMC.
* Represent a critical first step in responding to community concerns and local medical care needs likely to arise during the unfolding COVID-19 epidemic.
* The proposed expansions of NHUVA PWMC and NHUVA HMC would supplement similar temporary expansions of capacity requested for the five Inova Health System hospitals in PD 8.

Based on these considerations, and on the recognition that the beds requested are likely to be needed soon, HSANV recommends that the Novant requests for the capacity and licensing changes proposed be granted.

If we can provide additional information, please let me know.

Sincerely,

Dean Montgomery

Executive Director

cc: Jamie Martin, Counsel, Novant Health UVA Health System

 Piero Mannino, Supervisor, DCOPN, VDH

 Robert Pugh, Chairperson, HSANV

1. Governor Northam issued Executive Order 52 on March 20, 2020. [↑](#footnote-ref-1)
2. These hospitals also operated 50 obstetrics beds and 32 psychiatric beds; 2018 is the most recent year for which official licensure data is publicly available for Virginia medical care facilities. There is no indication that there has been a change in the number of licensed acute care beds at a Novant hospital since the 2018 licensing reports were submitted. [↑](#footnote-ref-2)
3. HSANV notes and acknowledges that only two of the Novant hospitals seeking temporary bed increases are located in PD 8, that NHUVA CMC is located in PD 9 (Health Service Area I). We have reviewed, and reference all three requests in the belief that, considered collectively, they represent an interrelated system wide Novant effort to respond as quickly as possible to community concerns and medical needs. [↑](#footnote-ref-3)