

VIRGINIA DEPARTMENT OF HEALTH

Office of Licensure and Certification

Staff Analysis

April 10, 2020

Inova Health Care Services, Inc. (3/30/2020)

Alexandria, Virginia

Temporarily add 10 intensive care unit beds at Inova Alexandria Hospital

Hospital

Inova Alexandria Hospital (“IAH”) is a 501(c)(3) Virginia nonstock corporation. IAH is an incorporated division of Inova Health Care Services, Inc. d/b/a Inova Health System (“Inova”), which is also a 501(c)(3) Virginia nonprofit, nonstock corporation. The sole member of Inova Health System is the Inova Health System Foundation, Inc. Inova Health System’s offices are located in Falls Church, Virginia. IAH is located in Alexandria, Virginia, in Health Planning Region (“HPR”) II, Planning District (“PD”) 8.

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 (“VHI”), IAH operates an inventory of 318 licensed beds (**Table 1**). IAH 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

IAH 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, IAH requests authorization to temporarily add 10 intensive care unit (“ICU”) beds. The requested ICU beds would be added on the IAH campus in converted space within the existing post-anesthesia care unit (“PACU”).

The additional beds will be used to supplement normal operations, permitting existing ICU beds to be used for COVID-19 patients. The resulting bed configuration at IAH is shown in **Table 1**.

Table 1: IAH Requested Temporary Bed Inventory

Bed Type	Existing Beds	Requested Additional Beds	Resulting Available Beds
Adult ICU	50	10	60
Med/Surg	210	0	210
Obstetric	58	0	58
Total	318	10	328

Source: VHI (2018)

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:

IAH 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 suspended all non-essential procedures and surgeries.

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

IAH has made assurances that staffing will be provided by cross-training and redeploying operating room and PACU registered nurses (“RNs”) to work in the critical care and floor units, cross-training and redeploying ambulatory RNs and advanced practice providers to work on inpatient floors, modifying staffing levels and providing centralized telemedicine support.

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

IAH did not specifically address the availability of medical supplies and personal protection equipment (“PPE”) at its facility. IAH is in the same condition as other hospitals regarding the availability of PPE. The Virginia Disaster Medical Advisory Committee (“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:

IAH requests authorization to temporarily add 10 ICU beds. The requested beds will be located in converted space in the PACU of the hospital. The additional beds will be used to supplement normal operations, permitting existing ICU beds to be used solely for COVID-19 patients.

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

IAH intends to locate the requested ICU beds in the PACU within the existing hospital. The ICU beds will be located in an existing part of IAH that is already in use for patient care, therefore the space meets life safety code requirements for the type of patients or residents expected to occupy the space.

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

Per the 2018 data provided by VHI, there are 3,209 licensed inpatient beds in PD 8, of which 1,749 are medical surgical beds and 326 are 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 IAH's and the area's, capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 8. IAH's proposal increases its bed capacity by 3% and is a 0.3% increase in bed capacity in the PD.

7. Other alternatives to adding bed capacity:

As discussed, given that IAH has already provided assurances that it has suspended all elective procedures, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 8, the addition of bed capacity in space that has been freed up as a result of the cancelation of all non-essential procedures and surgeries in an existing medical care facility 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 4,509 positive cases of COVID-19, the illness caused by the virus, and 121 deaths.¹ To date, the Centers for Disease Control and Prevention has confirmed 427,460 cases in the United States, with 14,696 deaths.² Alexandria Health District currently reports 174 COVID-19 patients, with another 1,089 cases in the surrounding jurisdictions.

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

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

Recommendation of the Health Systems Agency of Northern Virginia Information

The Health Systems Agency of Northern Virginia (“HSANV”) recommended approval of this request and noted that the request appears thought out and prudent. Among other considerations, the initiatives described:

1. Respond directly to the intent and provisions of Executive Order 52, as it is expanding inpatient bed capacity, specifically ICU beds.
2. Cover all of Inova’s community hospitals, taking advantage of space and capabilities in each facility that can be returned to service or converted to special use quickly.
3. Contemplate economically rational changes, converting PACUs to temporary ICUs, recapturing medical surgical bed space recently vacated during campus renovation and modernization projects, and accelerating the deployment of inpatient capacity under development as part of authorized capital expenditures.
4. Represent a critical inpatient element of the broader, more comprehensive Inova response to community concerns and local medical care needs arising from the unfolding COVID-19 epidemic.

Findings and Conclusions

IAH requests authorization to temporarily add 10 licensed ICU beds. The requested ICU beds will be located in converted space in the existing PACU unit and will be used to supplement normal operations, permitting existing ICU beds to be used for COVID-19 patients. DCOPN finds that, due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, IAH has an immediate need to temporarily add 10 ICU beds. Furthermore, DCOPN finds that IAH’s plan for training and shifting staff is a reasonable solution for staffing the requested beds. Additionally, DCOPN concludes that IAH’s plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis. Moreover, DCOPN finds that IAH’s plan to expand bed capacity in existing hospital space assures patient safety is maintained from a fire and life safety code perspective. DCOPN finds that in the absence of a temporary increase to bed capacity in the PD, 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 15, and limit the ability of health care providers adequately treat and limit the spread of the virus.

Staff Recommendation

This staff report recommends the **approval** of Inova Healthcare Services Inc.’s request to temporarily add 10 ICU beds at Inova Alexandria Hospital. The staff recommendation is based on the following findings:

1. IAH has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, IAH has an immediate need to temporarily add 10 licensed ICU beds.
2. IAH's plan for cross-training and redeploying operating room, PACU, and ambulatory staff is a reasonable solution for staffing the additional beds.
3. IAH's plan to expand bed capacity in existing hospital space throughout the campus assures patient safety is maintained from a fire and life safety code perspective.
4. HSANV recommended approval of IAH's request.