

**VIRGINIA DEPARTMENT OF HEALTH**  
**Office of Licensure and Certification**  
**Staff Analysis**

April 8, 2020

**Inova Fairfax Hospital (3/31/2020)**

Inova Health Care Services d/b/a Inova Fairfax Hospital  
Falls Church, Virginia  
Temporarily add 115 Beds at Inova Fairfax Hospital

**Hospital**

Inova Fairfax Hospital (“Inova Fairfax”) is a division of Inova Health Care Services, Inc., a 501(c)(3) Virginia nonprofit, non-stock corporation. Inova Health Care Services, Inc. is the sole member of the Inova Health System Foundation, which is a 501(c)(3) Virginia nonprofit, non-stock corporation. Inova Fairfax Hospital are located in Falls Church (Fairfax County), Virginia, 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, Inova Fairfax operates an inventory of 612 beds.

**Request**

Inova Fairfax 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, Inova Fairfax requests authorization to add temporarily 115 beds. Inova Fairfax currently projects the need for an additional 57 medical/surgical beds and 58 intensive care unit (“ICU”) beds. The requested beds will be spread across the existing but currently inactive beds in Inova Fairfax’s Adult Tower and the Inova Vascular Institute on Inova Fairfax’s campus. The resulting bed configuration at Inova Fairfax is shown in Table 1.

**Table 1: Inova Fairfax Requested Temporary Bed Inventory**

<b>Bed Type</b>	<b>Existing Beds</b>	<b>Requested Additional Beds</b>	<b>Resulting Available Beds</b>
Adult ICU	102	58	160
Alcohol/Drug	25	0	25
Med/Surg	526	57	583
Obstetric	96	0	96
Pediatric	92	0	92
Pediatric ICU	26	0	26
Psych Bed - Other Adult	41	0	41
Psych Bed - Other Child	15	0	15
<b>Total</b>	<b>923</b>	<b>115</b>	<b>1,038</b>

**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:**

Inova Fairfax does not address any efforts to free up existing capacity in compliance with the March 25, 2020 Order of Public Health Emergency 2 by suspending all elective procedures that, if delayed, are not anticipated to cause harm to the patient. The applicant states in their request that efforts are being made to increase the use of telemedicine to lessen the number of patients that do not have COVID-19 that visit Inova Fairfax.

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

Inova Fairfax states that staffing will be provided by cross-training and redeploying operating room and PACU RNs to work in critical care and floor units. Additional staffing will be provided by cross-training and redeploying ambulatory RNs and APPs to work on inpatient floors. Finally, Inova Fairfax states that they will take additional steps to providing sufficient staffing by modifying staffing levels and providing centralized telemedicine support.

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

Inova Fairfax does not address the availability of medical supplies and PPE in the facility. Inova Fairfax is in the same condition as other hospitals regarding the availability of PPE. 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:**

Inova Fairfax intends to add the requested beds by activating existing but currently inactive beds in Inova Fairfax’s Adult Tower and the Inova Vascular Institute. The applicant does not

provide a more detailed breakdown of where the ICU beds and medical/surgical beds will be placed in their request.

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

As discussed in the previous section, Inova Fairfax intends to add the requested beds by activating existing but currently inactive beds in Inova Fairfax's Adult Tower and the Inova Vascular Institute. Inova Fairfax asserts that both areas comply with life safety requirements. The applicant does not further address this criteria.

**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 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 Inova Fairfax's and the area's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 8. Inova Fairfax's proposal increases their bed capacity by 12.5% and is a 3.6% increase in bed capacity in the planning district.

**7. Other alternatives to adding bed capacity:**

As discussed, given that the applicant has made efforts to limit non-COVID-19 patients at the hospital through the use of telemedicine, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 8, the addition of beds in existing space that has been freed up for this purpose within the hospital represents the best option. Inova Fairfax 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 4,042 cases of COVID-19, the illness caused by the virus, and 109 deaths.<sup>1</sup> To date, the Centers for Disease Control and Prevention has confirmed 395,011 cases in the United States, with 12,754 deaths.<sup>2</sup> Fairfax Health District currently has the highest number of COVID-19 patients in the Commonwealth with 690 confirmed cases, as of this writing. Combined with the surrounding Health Districts, Inova Fairfax's service area reports 1,706 COVID-19 positive patients.

The Health System of North Virginia ("HSANV") recommended approval of Inova Fairfax's request to add 115 beds. HSANV found Inova's request to be thought out and prudential. Among other considerations, the initiatives described:

1. Respond directly to the intent and provisions of Executive Order 52. The request is for expanded inpatient bed capacity, adult medical surgical beds and intensive care beds.

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

<sup>2</sup> [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](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)

2. Cover all Inova 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 post-anesthesia care units to temporary intensive care units, 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.

Based on these considerations, and on the recognition that the beds are likely to be needed soon, HSANV recommended Inova Fairfax's request be granted. DCOPN agrees with the HSANV recommendation for approval, concurs with, and adopts, the attached HSANV analysis.

#### **DCOPN Findings and Conclusions**

Inova Fairfax proposes to add temporarily 115 beds. Inova Fairfax intends to add the requested beds by activating existing but currently inactive beds in Inova Fairfax's Adult Tower and the Inova Vascular Institute. DCOPN finds that, due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, that Inova Fairfax has an immediate need to add temporarily 115 beds. Inova Fairfax 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 8, and limit the ability of health care providers adequately treat and limit the spread of the virus. This is especially important in the Fairfax health district, which has the highest number of COVID-19 patients in the Commonwealth, as of this writing.

#### **DCOPN Staff Recommendations**

The Division of Certificate of Public Need recommends the **approval** of Inova Health Care Services d/b/a Inova Fairfax Hospital's request to add temporarily 115 beds at Inova Fairfax Hospital. DCOPN's recommendation is based on the following findings.

1. Inova Fairfax has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, Inova Fairfax has an immediate need to temporarily add 115 licensed inpatient beds.
2. Inova Fairfax's plan for training and shifting staff is a reasonable solution for staffing the additional beds.

3. Inova Fairfax'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 Inova Fairfax's request.
5. Inova Fairfax is located in Fairfax health district, which has the highest number of COVID-19 patients in the Commonwealth, as of this writing.