

VIRGINIA DEPARTMENT OF HEALTH

Office of Licensure and Certification

Staff Analysis

April 9, 2020

Inova Loudoun Hospital (3/30/2020)

Inova Loudoun Hospital

Leesburg, Virginia

Temporarily add 112 Beds at Inova Loudoun Hospital

Hospital

Inova Loudoun Hospital (Inova Loudoun) is a 501(c) (3) Virginia nonstock corporation organized in 1988. Inova Loudoun is an incorporated division of Inova Health Care Services, Inc. (which does business as Inova Health System), 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. The Inova Health System's offices are located in Falls Church, Virginia. Inova Loudoun is located in Leesburg (Loudoun County), Virginia, which is in Planning District (PD) 8 of Health Planning Region (HPR) II.

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, Inova Loudoun operates an inventory of 183 licensed beds (**Table 1**). Inova Loudoun 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

Inova Loudoun cites an emergent need to expand bed capacity due to an influx of patients and increased bed utilization resulting from COVID-19 infection. Inova Loudoun requests

authorization to temporarily add 112 licensed medical/surgical level of care beds. The requested beds would be added on the Inova Loudoun campus located at 44045 Riverside Parkway, Leesburg, Virginia in the new bed tower. Construction of the bed tower is complete and it is ready for occupancy. The resulting bed configuration at Inova Loudoun is show in **Table 1**.

Table 1: Inova Loudoun Requested Temporary Bed Inventory

Bed Type	Existing Beds	Requested Additional Beds	Resulting Available Beds
Medical/Surgical	100	112	212
ICU	23	0	23
Pediatric	14	0	14
Obstetric	24	0	24
Psychiatric	22	0	22
Total	183	112	295

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 Loudoun 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, it has temporarily postponed all surgical cases to the extent possible.

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

Inova Loudoun asserts that staffing will be provided by cross-training and redeploying operating room and Post-anesthesia Care Unit (PACU) RNs to work in the critical care and floor units, cross-training and redeploying ambulatory RNs and APPs 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:

Inova Loudoun did not specifically address the availability of medical supplies and personal protection equipment at its facility. Inova Loudoun 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 Loudoun will add the requested beds on its campus located at 44045 Riverside Parkway, Leesburg, Virginia in the new bed tower. Construction of the bed tower is complete and it is ready for occupancy. Inova Loudoun asserts that the additional beds will be used to care for patients with COVID-19 directly or to supplement existing operations, depending on the nature and timing of patient demand.

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

As previously discussed, Inova Loudoun will locate the requested beds in the newly-constructed bed tower on the Inova Loudoun campus. Inova Loudoun provided assurances that the bed tower is ready for occupancy, though it has not yet been brought online. Inova Loudoun further asserts that the beds satisfy life safety code requirements.

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 300 are adult intensive care unit beds, 26 are pediatric intensive care unit beds and 1,749 are medical/surgical 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 Loudoun's and the area's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 8. Inova Loudoun's proposal increases its bed capacity by 62% and increases PD 8's bed capacity by 3.5%.

7. Other alternatives to adding bed capacity:

As discussed, given that the applicant has already provided assurances that it has suspended all of elective procedures, and the anticipated bed capacity shortages at other facilities in PD 8, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 8, there are no alternatives to the requested temporary addition of bed capacity. Inova Loudoun 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.¹ To date, the Centers for Disease Control and Prevention has confirmed 395,011 cases in the United States, with 12,754 deaths.² At the time of this writing there were 258 cases of COVID-19 positive patients in Loudoun Health District with another 1,012 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

The Health Systems Agency of Northern Virginia (HSANV) recommended approval of Inova's request and noted that the request appears thoughtful and prudent. 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.
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.

DCOPN agrees with the HSANV recommendation for approval, and concurs with, and adopts, the HSANV analysis.

DCOPN Findings and Conclusions

Inova Loudoun proposes to temporarily add 112 medical/surgical unit level of care beds. The Division of Certificate of Public Need (DCOPN) finds that, due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, that Inova Loudoun has an immediate need to temporarily add 112 beds. Inova Loudoun 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.

DCOPN Staff Recommendations

The Division of Certificate of Public Need recommends the **approval** of Inova Loudoun Hospital's request to temporarily add 112 licensed beds on its campus. DCOPN's recommendation is based on the following findings.

1. Inova Loudoun has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, Inova Loudoun has an immediate need to temporarily add 112 medical/surgical beds.

2. Inova Loudoun's plan for training and shifting available staff is a reasonable solution for staffing the additional beds.
3. Inova Loudoun's plan to expand bed capacity in existing hospital space assures patient safety is maintained from a fire and life safety code perspective.
4. The Health Systems Agency of Northern Virginia recommends approval of the request.