

# VIRGINIA DEPARTMENT OF HEALTH

## Office of Licensure and Certification

### Staff Analysis

April 10, 2020

#### **Inova Mount Vernon Hospital (3/30/2020)**

Alexandria (Fairfax County), Virginia

Temporarily add 12 Beds at Inova Mount Vernon Hospital

#### **Hospital**

Inova Health Care Services is a 501 (c)(3) Virginia not-for-profit, non-stock corporation located in Alexandria (Fairfax County), Virginia. The sole member of Inova Health Care Services is the Inova Health System Foundation, Inc. The foundation is also a 501 (c)(3) Virginia not-for-profit, non-stock corporation, doing business as Inova Health System. Inova Mount Vernon Hospital (IMVH) is one of five Northern Virginia hospitals owned and operated by Inova Health System: Inova Fairfax Hospital, Inova Alexandria Hospital, Inova Fair Oaks hospital, and Inova Loudoun Hospital. IMVH is located in Planning District (PD) 8, 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), IMVH operates an inventory of 237 licensed beds (**Table 1**). IMVH 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**

IMVH cites an emergent need to expand bed capacity due to an influx of patients and increased bed utilization resulting from COVID-19 infection. IMVH requests authorization to temporarily add 12 Intensive Care Unit (ICU) level of care beds. The requested beds would be added on the IMVH campus located at 2501 Parkers Lane, Arlington Virginia by converting existing space in

the Post-anesthesia Care Unit (PACU). The resulting bed configuration at IMVH is shown in Table 1.

**Table 1: IMVH Requested Temporary Bed Inventory**

<b>Bed Type</b>	<b>Existing Beds</b>	<b>Requested Additional Beds</b>	<b>Resulting Available Beds</b>
Medical/Surgical	120	0	120
ICU	20	12	32
Medical Rehabilitation	67	0	67
Psychiatric	30	0	30
<b>Total</b>	<b>237</b>	<b>12</b>	<b>249</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:**

IMVH 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:**

IMVH asserts that staffing will be provided by cross-training and redeploying operating room and 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:**

IMVH did not specifically address the availability of medical supplies and personal protection equipment at its facility. IMVH, as a hospital within the Inova Health System, has reasonable access to supplies given the current shortages.

**4. The specific plan for increasing bed capacity:**

IMVH will add the requested beds on its campus located at 2501 Parkers Lane, Arlington, Virginia by converting existing space in the PACU. IMVH asserts that the additional beds will be used to supplement normal operations, permitting existing ICU beds to be used for patients with COVID-19.

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

As previously discussed, IMVH will locate the requested beds in the existing PACU. The PACU headwalls and support systems are consistent with the needs of ICU patients. The location meets the requirements of NFPA 101 for a smoke compartment; the location does not exceed 22,500 square feet; and travel distance does not exceed 200 square feet to an exit. Additionally, IMVH is protected throughout by a sprinkler system and have 24/7 monitored central fire alarm systems.

**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 IMVH's, and the area's, capacity to treat patients, thereby jeopardizing the quality of care for the residents of PD 8. IMVH's proposal increases its bed capacity by 5% and increases PD 8's bed capacity by less than 1%.

**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.

**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 cases of COVID-19, the illness caused by the virus, and 121 deaths.<sup>1</sup> To date, the Centers for Disease Control and Prevention has confirmed 427,460 cases in the United States, with 14,696 deaths.<sup>2</sup> Alexandria Health District currently reports 174 COVID-19 patients, with another 1,089 cases in the surrounding jurisdictions.

**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 thought out and prudent. Among other considerations, the initiatives described:

---

<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)

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 Findings and Conclusions**

IMVH proposes to temporarily add 12 intensive care unit 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, IMVH has an immediate need to temporarily add 12 beds. IMVH 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 Mount Vernon Hospital's request to temporarily add 12 beds on its campus. DCOPN's recommendation is based on the following findings.

1. IMVH has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, IMVH has an immediate need to temporarily add 12 intensive care unit level of care beds.
2. IMVH's plan for training and shifting available staff is a reasonable solution for staffing the additional beds.
3. IMVH'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.