

# VIRGINIA DEPARTMENT OF HEALTH

## Office of Licensure and Certification

### Staff Analysis

April 15, 2020

#### **Pulaski Community Hospital, Inc. (4/10/2020)**

LewisGale Hospital Pulaski

Pulaski, Virginia

Temporarily add 15 Beds at LewisGale Hospital Pulaski

#### **Hospital**

Pulaski Community Hospital, Inc. d/b/a LewisGale Hospital Pulaski (LGHP) is located in Pulaski, Virginia in Planning District (PD) 4, Health Planning Region (HPR) III.

#### **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, LGHP operates an inventory of 147 beds (**Table 1**). LGHP 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**

LGHP 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, LGHP requests authorization to add temporarily 15 intensive care unit (ICU) licensed beds. The requested beds will be located in the post-anesthesia care unit (PACU) and in the pre-op and recovery areas of ambulatory surgery unit. The resulting bed configuration at LGHP is shown in **Table 1**.

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

<b>Bed Type</b>	<b>Beds</b>	<b>Requested Additional Beds</b>	<b>Resulting Available Beds</b>
ICU	10	15	25
Med/Surg	137	0	137
<b>Total</b>	<b>147</b>	<b>15</b>	<b>162</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:**

LGHP 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 elective procedures that, if delayed, are not anticipated to cause harm to the patient. Moreover, LGHP has developed plans to convert existing progressive care beds into ICU beds, which would increase the availability of ICU beds for COVID-19 patients without increasing the number of beds required by the hospital.

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

LGHP states that HCA Virginia hospitals can utilize team members, both locally and across the state, that have been flexed due to low utilization in other portions of the health care system and have developed appropriate education to swiftly repurpose team members into needed areas to help support patient care efforts.

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

LGHP has not made assurances that it has sufficient access to available medical supplies and personal protection equipment (PPE) in the facility. Given that the availability of PPE is a State and National concern, LGHP contends that their supply chain professionals are working around the clock, and will have access to PPE commensurate with that of other acute care hospitals. 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:**

LGHP intends to place the requested beds in the PACU and in the pre-op and recovery areas of ambulatory surgery unit. Four beds will be placed in the PACU and 11 beds will be placed in the pre-op and recovery areas of the ambulatory surgery unit. Both areas are located on the

ground floor of the hospital. At this time, the planned use of the beds is supplementation of normal operations based on existing and projected increase in occupancy by COVID-19 patients.

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

LGHP states that all beds will be equipped with oxygen, medical gases, and vacuum capabilities. Moreover, LGHP has provided assurances that the spaces will meet applicable 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 Virginia Health Information (VHI), there are 464 licensed inpatient beds in PD 4, of which 354 are medical surgical beds and 32 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 LGHP's, and the area's, capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 4. LGHP's proposal increases their overall bed capacity by 10.2% and is a 3.2% increase in overall bed capacity in the planning district.

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

As discussed, given that the hospital has already provided assurances that they have suspended all of elective procedures, and the efforts taken by the hospital to maximize the number of available ICU beds to treat COVID-19 patients, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 4, the addition of beds in existing space within the hospital represents the best option.

**8. The current state of COVID-19 in the community:**

As previously discussed, at the time of this writing, the Virginia Department of Health reports that Virginia has 6,500 cases of COVID-19, the illness caused by the virus, and 195 deaths.<sup>1</sup> To date, the Centers for Disease Control and Prevention has confirmed 579,005 cases in the United States, with 22,252 deaths.<sup>2</sup> The New River Health District currently reports 44 confirmed cases, with an additional 45 patients in the surrounding jurisdictions.

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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)

### **Findings and Conclusions**

LGHP proposes to temporarily add 15 ICU beds. The requested beds will be located in the PACU and in the pre-op and recovery areas of ambulatory surgery unit. Due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, LGHP has an immediate need to add temporarily 15 beds. LGHP 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 4, and limit the ability of health care providers adequately treat and limit the spread of the virus.

### **Staff Recommendations**

The staff recommends the **approval** of Pulaski Community Hospital, Inc. d/b/a LewisGale Hospital Pulaski request to add temporarily 15 beds at LewisGale Hospital Pulaski. The staff's recommendation is based on the following findings.

1. LGHP has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, LGHP has an immediate need to add temporarily 15 licensed inpatient beds.
2. LGHP's plan for training and shifting repurposed staff is a reasonable solution for staffing the additional beds.
3. LGHP's plan to expand bed capacity in existing hospital space assures patient safety is maintained from a fire and life safety code perspective.