

VIRGINIA DEPARTMENT OF HEALTH

Office of Licensure and Certification

Staff Analysis

April 13, 2020

Lewis-Gale Medical Center, LLC d/b/a LewisGale Medical Center (4/10/2020)

Salem, Virginia

Temporarily add 26 ICU Beds at LewisGale Medical Center

Hospital

Lewis-Gale Medical Center, LLC d/b/a LewisGale Medical Center (LGMC) is located in the city of Salem, Virginia, in Planning District (PD) 5, 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.

According to the 2018 data provided by Virginia Health Information (VHI), LGMC operates an inventory of 506 beds (**Table 1**). LGMC 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

LGMC 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, LGMC requests authorization to temporarily add 26 ICU beds. Twenty of the requested beds will be located within the existing hospital's Post Anesthesia Care Unit (PACU) on the second floor, with the remaining six to be located in the cardiac catheterization recovery area on the second floor. The resulting bed configuration at LGMC is shown in Table 1.

Table 1: LGMC's Requested Temporary Bed Inventory

Bed Classification	Licensed Beds	Requested Additional Beds	Resulting Available Beds
Adult ICU	36	26	62
Med Rehab	35	0	35
Med/Surg	282	0	282
Obstetric	23	0	23
Psychiatric Bed - Other Adult	106	0	106
Psychiatric Bed - Other Child	24	0	24
Total	506	26	532

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:

LGMC 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. LGMC has also developed plans to convert progressive care beds to ICU beds.

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

LGMC has made assurances that it has the necessary professional staff to provide care in the additional beds. As a part of the HCA Health System, LGMC anticipates being able to utilize team members, both locally and across the state, that have been flexed due to low utilization in other portions of the health 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:

LGMC 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, LGMC 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:

LGMC requests authorization to temporarily add 26 ICU beds. Twenty of the requested beds will be located within the existing hospital's PACU on the second floor, with the remaining six to be located in the cardiac catheterization recovery area on the second floor. LGMC anticipates that the beds would be used to supplement normal operations due to existing bed occupancy by COVID-19 patients.

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

LGMC intends to locate the requested beds within the existing hospital PACU and the cardiac catheterization recovery area on the second floor. The ICU beds will be located in an existing part of LGMC 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 Virginia Health Information, there are 1,448 licensed inpatient beds in PD 5. There are currently 153 licensed ICU beds in PD 5 and 924 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 LGMC's, and the area's, capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 5. LGMC's proposal increases their bed capacity by 5%, and is a 2% increase in bed capacity in the planning district.

7. Other alternatives to adding bed capacity:

As discussed, given that LGMC has already provided assurances that they have suspended all elective procedures, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 5, the addition of beds in an existing medical care facility space 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 5,747 cases of COVID-19, the illness caused by the virus, and 149 deaths.¹ To date, the Centers for Disease Control and Prevention has confirmed 525,704 cases in the United States, with 20,486 deaths.² Alleghany Health District currently has 50 COVID-19 patients, with another 70 patients 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

Findings and Conclusions

LGMC requests authorization to temporarily add 26 ICU beds. The requested beds will be located within the existing hospital Post Anesthesia Care Unit and the cardiac catheterization recovery area on the second floor. LGMC anticipates that the beds would be used to supplement normal operations due to existing bed occupancy by COVID-19 patients. LGMC 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 5, and limit the ability of health care providers to adequately treat and limit the spread of the virus.

Staff Recommendations

The Division of Certificate of Public Need recommends the **approval** of Lewis-Gale Medical Center, LLC d/b/a LewisGale Medical Center's request to temporarily add 26 beds at LewisGale Medical Center. This staff recommendation is based on the following findings.

1. LGMC has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, LGMC has an immediate need to temporarily add 26 licensed inpatient beds.
2. LGMC's plan for training and shifting ambulatory staff is a reasonable solution for staffing the additional beds.
3. LGMC's plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis.
4. LGMC'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.