

# VIRGINIA DEPARTMENT OF HEALTH

## Office of Licensure and Certification

### Staff Analysis

April 11, 2020

#### **Novant Health UVA Health System Culpeper Medical Center (3/31/2020)**

Culpeper, Virginia

Temporarily add 28 Medical/Surgical Beds at Culpeper Medical Center

#### **Hospital**

Culpeper Memorial Hospital, Incorporated d/b/a Novant Health UVA Health System Culpeper Medical Center (CMC) is a wholly owned subsidiary of Novant Health UVA Health System. Novant Health UVA Health System is a regional partnership between Novant Health and the University of Virginia Health System. CMC is located in the Town of Culpeper, Planning District (PD) 9, Health Planning Region (HPR) I.

#### **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), CMC operates an inventory of 70 licensed beds (**Table 1**). CMC 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**

CMC cites an emergent need to expand bed capacity due to an influx of patients and increased bed utilization resulting from COVID-19 infection. CMC requests authorization to temporarily add 28 medical/surgical level of care beds. The requested beds would be added on the CMC campus located at 501 Sunset Lane, Culpeper, Virginia. The resulting bed configuration at CMC is shown in **Table 1**.

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

<b>Bed Type</b>	<b>Existing Beds</b>	<b>Requested Additional Beds</b>	<b>Resulting Available Beds</b>
Medical/Surgical	54	28	82
ICU	6	0	6
Obstetric	10	0	10
<b>Total</b>	<b>70</b>	<b>28</b>	<b>98</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:**

CMC 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 postponed or suspended elective procedures/surgeries and patient visits. Additionally, it has created barriers for infection control and transitioned as much ambulatory care as is appropriate to virtual/telephonic visits.

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

CMC asserts that staffing will be provided by redeploying teammates whose regular jobs have been impacted by reduction/cessation of elective procedures and other services at the hospital to the areas and departments that will be in high demand during the expected surge of COVID-19 patients. Additionally, CMC has developed a centralized staffing pool that calls in additional services from within and without CMC's health system. For example, CMC is working with local physicians' offices and outpatient surgical hospitals so that staff who have had hours reduced are available to assist with the expected patient surge. Additionally, CMC is adjusting its paid time off policy to ensure staffing flexibility and coordinating with local partners to ensure that staff childcare coverage needs are addressed.

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

CMC has modified its personal protection equipment (PPE) policies to conserve supplies. CMC is also working with Novant Health, the University of Virginia and local, state and federal bodies to access existing stock of PPE. Finally, CMC is accepting donations from the community to enhance its supply needs.

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

CMC will add the requested beds on its campus located at 501 Sunset Lane, Culpeper, Virginia. The beds will be located in existing spaces in the Post Anesthesia Care Unit (PACU), the Pre-Op Unit, the Cancer Center and the rehabilitation clinic. CMC asserts that the requested beds will be used to supplement normal operations due to the existing and projected increase in bed occupancy by COVID-19 patients.

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

As previously discussed, CMC will locate the requested beds in the PACU, pre-op unit, the Cancer Center and the Rehabilitation Clinic. CMC asserts that these spaces are currently used for patient care or have been used for patient care in the past. CMC plans to activate the beds in the higher-acuity clinical care spaces (PACU and Pre-Op unit) first, while activating the beds in the rehabilitation clinic and Cancer Center for lower-acuity cases based on patient needs and staffing supply. CMC has provided assurance that these areas are or will be provided with medical gas headwalls that meet the needs of the patients. Furthermore, CMC has 100% sprinkler coverage and smoke detection coverage as required by the Life Safety Code. The fire alarms and sprinkler system are monitored 24 hours per day, seven days per week. The proposed areas are located in the hospital's existing life safety compartments and suites, where life safety size limitations will not be exceeded.

**6. The availability of beds at other community hospitals and nursing homes in the community:**

Per the 2018 data provided by VHI, there are 167 licensed inpatient beds in PD 9, of which 16 are adult intensive care unit beds and 132 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 CMC's and the area's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 9. CMC's proposal increases its bed capacity by 40% and increases PD 9's bed capacity by 16.8%.

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

As previously 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 9, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 9, 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, Virginia Department of Health reports that Virginia has 5,077 cases of COVID-19, the illness caused by the virus, and 130 deaths.<sup>1</sup> To date, the Centers for

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

Disease Control and Prevention has confirmed 459,165 cases in the United States, with 16,570 deaths.<sup>2</sup> At the time of this writing there are 62 COVID-19 patients in the Rappahannock Rapidan Health District and another 658 patients in the surrounding jurisdictions.

### **DCOPN Findings and Conclusions**

CMC proposes to temporarily add 28 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, CMC has an immediate need to temporarily add 28 beds. CMC 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 9, and limit the ability of health care providers to adequately treat and limit the spread of the virus.

### **DCOPN Staff Recommendations**

The Division of Certificate of Public Need recommends the **approval** of Novant Health UVA Health System Culpeper Medical Center's request to temporarily add 28 beds on its campus. DCOPN's recommendation is based on the following findings.

1. CMC has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, CMC has an immediate need to temporarily add 28 medical/surgical beds.
2. CMC's plan for training and shifting available staff is a reasonable solution for staffing the additional beds.
3. CMC's plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis.
4. CMC's plan to expand bed capacity in existing hospital space assures patient safety is maintained from a fire and life safety code perspective.

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<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)