

VIRGINIA DEPARTMENT OF HEALTH
Office of Licensure and Certification
Staff Analysis

April 17, 2020

HCA Health Services of Virginia, Inc. (4/10/2020)

Parham Doctors' Hospital

Richmond, Virginia

Temporarily add 38 Beds at Parham Doctors' Hospital

Hospital

HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital is a for-profit, Virginia stock corporation. Parham Doctors' Hospital (PDH) is a campus of Henrico Doctors' Hospital located in Henrico County, Virginia, Health Planning Region (HPR) IV, Planning District (PD) 15.

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 (VHI), PDH operates an inventory of 200 beds (**Table 1**). PDH 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

PDH 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, PDH requests authorization to add temporarily 38 intensive care unit (ICU) beds. The requested beds will be located in the main post-anesthesia care unit (PACU) and pre-op areas on the ground floor of the hospital and the OR East PACU and pre-op areas in the ground floor of the former Parham Surgery Center that became part of the hospital in 2015. The resulting bed configuration at PDH is shown in **Table 1**.

Table 1: PDH Requested Temporary Bed Inventory

Bed Type	Beds	Requested Additional Beds	Resulting Available Beds
ICU	12	38	50
Med/Surg	36	0	36
Obstetric	128	0	128
Psych Bed - Other Adult	24	0	24
Total	200	38	238

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:

PDH 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, PDH 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:

PDH 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:

PDH 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, PDH 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:

PDH intends to place the requested beds in the main PACU and pre-op areas on the ground floor of the hospital and the OR East PACU and pre-op areas in the ground floor of the former

Parham Surgery Center that became part of the hospital in 2015. Of the 38 requested ICU beds, 21 will be placed in the main PACU and pre-op areas on the ground floor of the hospital and 17 will be placed in the OR East PACU and pre-op areas.

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

PDH states that all bed will be equipped with oxygen, medical gases, and vacuum capabilities. Moreover, PDH 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 VHI, there are 3,448 licensed inpatient beds in PD 15, of which 2,081 are medical surgical beds and 368 are ICU 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 PDH's, and the area's, capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 15. PDH's proposal increases their overall bed capacity by 19% and is a 1% 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 15, the addition of beds in existing space within the hospital 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 7,491 confirmed cases of COVID-19, the illness caused by the virus, and 231 deaths.¹ To date, the Centers for Disease Control and Prevention has confirmed 632,548 cases in the United States, with 31,071 deaths.² The Henrico Health District currently reports 532 cases of COVID-19 patients, with an additional 641 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

PDH proposes to temporarily add 38 ICU beds. The requested beds will be located in the main PACU and pre-op areas on the ground floor of the hospital and the OR East PACU and pre-op areas in the ground floor of the former Parham Surgery Center that became part of the hospital in 2015. Due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, PDH has an immediate need to add temporarily 38 beds. PDH 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 15, 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 HCA Health Services of Virginia, Inc. d/b/a Henrico Doctors' Hospital request to temporarily add 38 licensed beds at Parham Doctors' Hospital. The staff's recommendation is based on the following findings.

1. PDH has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, PDH has an immediate need to add temporarily 38 licensed inpatient beds.
2. PDH's plan for training and shifting repurposed staff is a reasonable solution for staffing the additional beds.
3. PDH's plan to expand bed capacity in existing hospital space assures patient safety is maintained from a fire and life safety code perspective.