

**VIRGINIA DEPARTMENT OF HEALTH**  
**Office of Licensure and Certification**  
**Staff Analysis**

April 10, 2020

**Bon Secours Mercy Health Petersburg, LLC d/b/a Southside Regional Medical Center  
(4/3/2020)**

Southside Regional Medical Center

Petersburg, Virginia

Temporarily add 22 ICU Beds at Southside Regional Medical Center

**Hospital**

Bon Secours Mercy Health Petersburg, LLC d/b/a Southside Regional Medical Center (“SRMC”) is a nonprofit limited liability company. SRMC is located in Health Planning Region (“HPR”) IV, Planning District (“PD”) 19.

**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”), SRMC operates an inventory of 300 beds (**Table 1**). SRMC 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**

SRMC 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, SRMC requests authorization to temporarily add 22 intensive care unit (“ICU”) beds. The requested ICU beds will be located in existing inpatient rooms that were historically used to house short-stay post-surgical patients who are no longer being treated in those beds due to the curtailing of non-emergent and elective inpatient surgical procedures. The resulting bed configuration at SRMC is shown in Table 1.

**Table 1: SRMC’s Requested Temporary Bed Inventory**

<b>Bed Type</b>	<b>Licensed Beds</b>	<b>Requested Additional Beds</b>	<b>Resulting Available Beds</b>
Adult ICU	28	22	50
Med/Surg	213	0	213
Obstetric	29	0	29
Psychiatric Bed - Other Adult	30	0	30
<b>Total</b>	<b>300</b>	<b>22</b>	<b>322</b>

Source: VHI (2018)

**Considerations**

In determining whether a need exists for the requested additional bed capacity, the 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:**

SRMC 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 non-essential procedures and surgeries.

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

SRMC has made assurances that it has the necessary professional staff to provide care in the additional beds. Staff temporarily displaced by the curtailing of non-essential surgery will be used to staff the additional intensive care beds and provide care in a safe and effective environment of care.

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

SRMC has made assurances that it has sufficient access to available medical supplies and personal protection equipment (“PPE”) in the facility. As part of Bon Secours Mercy Health, SRMC works with sister facilities in Richmond, Hampton Roads, and nationwide for access to all necessary medical supplies and PPE. In addition, SRMC has initiated the reprocessing of N95 masks to ensure adequate supply. 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:**

SRMC requests authorization to temporarily add 22 ICU beds. Since there is a very limited surgical caseload being performed, SRMC intends to convert the post-anesthesia care unit

(“PACU”) for temporary use for the additional 22 ICU beds. These temporary beds are all equipped with oxygen, medical gases and vacuum capabilities, and are monitored.

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

SRMC intends to convert the PACU for temporary use for the additional 22 ICU beds. These temporary beds are all equipped with oxygen, medical gases and vacuum capabilities, and are monitored. The ICU beds will be located in an existing part of SRMC 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 VHI, there are 799 licensed inpatient beds in PD 19, of which 366 are medical surgical beds and 52 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 SRMC and the area’s capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 19. SRMC’s proposal increases their bed capacity by 6.8%, and is a 2.8% increase in bed capacity in the PD.

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

As discussed, given that SRMC has already provided assurances that they have suspended all of elective procedures, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 19, the addition of beds in space that has been freed up as a result of the cancelation of all non-essential procedures and surgeries 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 4,509 positive 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> Crater Health District currently reports 79 COVID-19 patients, with another 236 COVID-19 patients in the surrounding jurisdictions.

**Findings and Conclusions**

SRMC requests authorization to temporarily add 22 ICU beds. The requested beds will be located in the PACU. DCOPN finds that, due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, SRMC has an

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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)

immediate need to temporarily add 22 ICU beds. Furthermore, DCOPN finds that SRMC's plan for training and shifting staff is a reasonable solution for staffing the requested beds. Additionally, DCOPN concludes that SRMC's plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis. Moreover, DCOPN finds that SRMC's plan to expand bed capacity in existing hospital space assures patient safety is maintained from a fire and life safety code perspective. DCOPN finds that in the absence of a temporary increase to bed capacity in the PD, 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 19, 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 Bon Secours Mercy Health Petersburg, LLC d/b/a Southside Regional Medical Center's request to temporarily add 22 ICU beds at Southside Regional Medical Center. This staff recommendation is based on the following findings.

1. SRMC has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, SRMC has an immediate need to temporarily add 22 licensed inpatient beds.
2. SRMC's plan for training and shifting ambulatory staff is a reasonable solution for staffing the additional beds.
3. SRMC's plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis.
4. SRMC'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.