

# **VIRGINIA DEPARTMENT OF HEALTH**

## **Office of Licensure and Certification**

### **Staff Analysis**

April 13, 2020

#### **Spotsylvania Medical Center, Inc. d/b/a Spotsylvania Regional Medical Center (4/10/2020)**

Spotsylvania Regional Medical Center  
Fredericksburg, Virginia

Temporarily add 22 ICU Beds at Spotsylvania Regional Medical Center

#### **Hospital**

Spotsylvania Medical Center, Inc. d/b/a Spotsylvania Regional Medical Center (SRMC) is located in the city of Fredericksburg, Virginia, in Planning District (PD) 16, 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), SRMC operates an inventory of 133 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 ICU beds. The requested beds will be located within the existing hospital's Post Anesthesia Care Unit (PACU) and Pre-Op area on the ground floor. The resulting bed configuration at SRMC is shown in Table 1.

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

<b>Bed Classification</b>	<b>Licensed Beds</b>	<b>Requested Additional Beds</b>	<b>Resulting Available Beds</b>
Adult ICU	12	22	34
Med/Surg	83	0	83
Obstetric	10	0	10
Psychiatric Bed - Other Adult	28	0	28
<b>Total</b>	<b>133</b>	<b>22</b>	<b>155</b>

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:**

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 elective procedures that, if delayed, are not anticipated to cause harm to the patient. SRMC 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:**

SRMC 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, SRMC 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:**

SRMC 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, SRMC 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:**

SRMC requests authorization to temporarily add 22 ICU beds. The requested beds will be located within the existing hospital's PACU and Pre-Op area on the ground floor. SRMC

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:**

SRMC intends to locate the requested beds within the existing hospital's PACU and Pre-Op area on the ground floor. 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 742 licensed inpatient beds in PD 16. There are currently 56 licensed ICU beds and 466 medical/surgical beds in PD 16. 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's and the area's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 16. SRMC's proposal increases their bed capacity by 16%, and is a 3% increase in bed capacity in the planning district.

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

As discussed, given that SRMC 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 16, 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.<sup>1</sup> To date, the Centers for Disease Control and Prevention has confirmed 525,704 cases in the United States, with 20,486 deaths.<sup>2</sup> The Rappahannock Health District currently has 171 COVID-19 patients, with another 564 patients in the surrounding jurisdictions.

**Findings and Conclusions**

SRMC requests authorization to temporarily add 22 licensed ICU beds. The requested beds will be located within the existing hospital's PACU and Pre-Op area on the ground floor. SRMC anticipates that the beds would be used to supplement normal operations due to existing bed occupancy by COVID-19 patients. SRMC 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

<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)

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 16, 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 Spotsylvania Medical Center, Inc. d/b/a Spotsylvania Regional Medical Center's request to temporarily add 22 licensed beds at Spotsylvania 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.