

VIRGINIA DEPARTMENT OF HEALTH
Office of Licensure and Certification
Staff Analysis

April 16, 2020

**Northern Virginia Community Hospital, LLC d/b/a StoneSprings Hospital Center
(4/13/2020)**

Dulles, Virginia

Temporarily add 8 Beds at StoneSprings Hospital Center

Hospital

Northern Virginia Community Hospital, LLC d/b/a StoneSprings Hospital Center (SSHC) is located in Dulles (Loudoun County), Virginia in Health Planning Region (HPR) II and Planning District (PD) 8.

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), SSHC operates an inventory of 124 licensed beds (**Table 1**). SSHC 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

SSHC cites an emergent need to expand bed capacity due to an influx of patients and increased bed utilization resulting from COVID-19 infection. SSHC requests authorization to temporarily add eight intensive care unit (ICU) beds. The requested beds would be added on the SSHC campus located at 24440 Stone Springs Boulevard, Dulles, Virginia. The resulting bed configuration at SSHC is shown in **Table 1**.

Table 1: StoneSprings Hospital Center Requested Temporary Bed Inventory

Bed Type	Existing Beds	Requested Additional Beds	Resulting Available Beds
Medical/Surgical	100	0	100
ICU	10	8	18
Pediatric	4	0	4
Obstetric	10	0	10
Total	124	8	132

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:

SSHC 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 taken a number of steps to increase the availability of existing beds, including suspension of elective procedures and conversion of step down unit beds to ICU beds.

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

HCA Virginia hospitals will utilize team members (both locally and across the state) that have been flexed due to low utilization in other portions of the healthcare system and have developed appropriate education to swiftly repurpose team members in needed areas to help support patient care efforts.

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

SSHC 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, SSHC 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:

SSHC will add the requested beds on its campus in the Post-Anesthesia Care Unit (PACU). SSHC asserts that the additional beds will be used to supplement existing operations due to existing bed occupancy by patients with COVID-19.

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

As previously discussed, SSHC will locate the requested beds in the PACU on the SSHC campus. The new beds will be equipped with oxygen, medical gases and vacuum capabilities. SSHC asserts that the spaces satisfy 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 3,209 licensed inpatient beds in PD 8, of which 300 are adult intensive care unit beds, 26 are pediatric intensive care unit beds and 1,749 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 SSHC's, and the area's, capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 8. SSHC's proposal increases its bed capacity by 6.5% and increases PD 8's bed capacity by less than 1%.

7. Other alternatives to adding bed capacity:

As discussed, given that SSHC has already provided assurances that it has suspended all of elective procedures, and the anticipated bed capacity shortages at other facilities in PD 8, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 8, 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, the Virginia Department of Health reports that Virginia has 6,889 cases of COVID-19, the illness caused by the virus, and 208 deaths.¹ To date, the Centers for Disease Control and Prevention has confirmed 605,390 cases in the United States, with 24,582 deaths.² At the time of this writing, there were 378 cases of COVID-19 positive patients in Loudoun Health District, with an additional 1,995 patients in the surrounding jurisdictions.

Recommendation of the Health Systems Agency of Northern Virginia

The Health Systems Agency of Northern Virginia (HSANV) recommended approval of SSHC's request and noted that the request is responsive to the purpose and specifications of Executive Order 52. Among other considerations, the initiatives described:

1. Complies with the objectives and provisions of Executive Order 52. The request to add eight temporary intensive care beds is supported by the information and assurances submitted in accordance with the guidance provided in the Commissioner of Health's letter of March 24, 2020.

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

2. Outlines a practical way to add critical care beds and capability quickly and efficiently. This is consistent with the steps SSHC has taken to date outside the provisions of Executive Order 52 (e.g., converting step down beds and space to intensive care use) to respond to community concerns and medical needs.
3. Takes advantage of space and related service capabilities at SSHC that are inherent in its newness and modest inpatient service volumes. With the additional intensive care beds, and a substantial number of unused adult medical-surgical beds, SSHC will have significant standby capacity to respond to increased demand that may arise from an influx of COVID-19 patients.
4. Represents a complementary step in responding to local concerns and medical care needs likely to arise within the next month and beyond.

Findings and Conclusions

SSHC proposes to temporarily add eight licensed ICU 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, that SSHC has an immediate need to temporarily add eight ICU beds. SSHC 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 8, and limit the ability of health care providers adequately treat and limit the spread of the virus.

Staff Recommendations

The Division of Certificate of Public Need recommends the **approval** of StoneSprings Hospital Center's request to temporarily add eight licensed beds on its campus. This staff recommendation is based on the following findings.

1. StoneSprings Hospital Center has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, StoneSprings Hospital Center has an immediate need to temporarily add eight ICU beds.
2. StoneSprings Hospital Center's plan for training and shifting available staff is a reasonable solution for staffing the additional beds.
3. StoneSprings Hospital Center's plan to expand bed capacity in existing hospital space assures patient safety is maintained from a fire and life safety code perspective.
4. The Health Systems Agency of Northern Virginia recommends approval of the request.