



April 8, 2020

VIA ELECTRONIC MAIL

Mr. Erik Bodin, Director
Division of Certificate of Public Need
Virginia Department of Health
9960 Mayland Drive, Suite 401
Richmond, Virginia 23233
COPN@vdh.virginia.gov

RE: Request for authorization to add 246 beds at Virginia Hospital Center in Planning District 8 under the authority of Executive Order 52

Dear Mr. Bodin:

I write in response to the Governor's directive in Executive Order 52 ("EO 52") and the immediate need to increase bed capacity within the Commonwealth of Virginia to accommodate the anticipated shortage of acute care bed capacity in response to the COVID-19 pandemic. Specifically, per EO 52, Virginia Hospital Center Arlington Health System d/b/a Virginia Hospital Center ("VHC") seeks authorization from the State Health Commissioner to increase the licensed bed capacity at VHC from **350** to **596** beds, an increase of 246 beds.¹ Details regarding the proposed capacity increase, as requested in the Implementation Letter dated March 24, 2020, follow below.

- **The Name and Address of the Specific Facility Requesting the Additional Beds:**

Virginia Hospital Center
1701 North George Mason Drive
Arlington, Virginia 22205-3698

- **How many additional licensed beds are requested:**

VHC is requesting a total of **246** additional beds, including 231 Medical/Surgical and 15 adult Intensive Care Unit ("ICU") beds. Many of the beds will be adaptable to acuity based on

¹ On May 20, 2017, VHC obtained Certificate of Public Need ("COPN") approval to add 44 Medical/Surgical beds based on high occupancy and growing demand at the hospital. COPN No. VA-04563. The 44 additional beds were approved to be located in space historically occupied by outpatient services and which requires some reconfiguration and construction to accommodate inpatient services. Implementation of those beds is underway but will not be completed in time to address the COVID-19-related surge need. Once complete, the addition will increase VHC's COPN-authorized licensed Medical/Surgical bed count to 231 and its overall COPN-authorized licensed bed count to 394.

patient need; many Medical/Surgical beds can readily function as ICU beds. VHC plans to add the proposed beds in phases as demand increases, as further described below.

- **Beds Requested by Type:**

Bed Type	Current Number of Licensed Beds	Increase in Beds	Total Beds after Capacity Expansion
Medical/Surgical	187 ²	+231	418
Intensive Care	32	+15	47
TOTAL	219	+246	465

- **Where the additional licensed beds will be located and if the proposed space currently meets Life Safety Code requirements for the type of patients or residents expected to occupy the space; and if not, what will be done to meet the life safety code requirements for the space:**

VHC has identified space within the existing licensed hospital space for all of the requested 246 beds, to be located as follows:

1. The existing Neonatal Intensive Care Unit space on the second floor of the 57 Building will be reconfigured to accommodate ten (10) adult ICU beds.
2. The existing Post-Anesthesia Care Unit ("PACU") space located on the second floor of the main hospital tower will be converted to accommodate five (5) adult ICU beds.
3. An existing observation area located on the first floor of the 57 Building will be converted to accommodate twenty-four (24) Medical/Surgical beds.
4. An existing private bed unit located on the fourth floor in the east wing of the 63 Building, currently housing fourteen (14) private beds, will be converted to a semi-private unit to accommodate twenty-eight (28) Medical/Surgical beds.
5. The existing private Medical/Surgical units on the fourth, fifth, sixth, seventh, and eighth floors were built to accommodate semi-private units. The conversion of all Medical/Surgical rooms on these floors will allow for the addition of one hundred seventy-nine (179) additional Medical/Surgical beds.

These spaces have been carefully selected by VHC's clinical service and facilities teams as spaces that can safely support the additional beds and the additional staff needed to care for these patients, with limited adjustments, within the existing clinical footprint.

All of the identified spaces already meet the applicable requirements under the Life Safety Code.

- **The planned use of the additional licensed beds (e.g. to supplement normal operations due to the existing bed occupancy by COVID-19 patients, or specifically for the COVID-19 patients):**

² VHC is currently licensed for, and fully staffs, 187 Medical/Surgical beds. As noted in footnote 1 above, in 2017, the Commissioner approved the addition of 44 Medical/Surgical beds at VHC in space currently occupied by outpatient services.

Depending on the timing and nature of surging patient demand, VHC plans to implement the additional beds in phases and use the additional beds to (i) support normal hospital operations as COVID-19 patients are treated in existing hospital space; and (ii) treat COVID-19 patients. Phase I of the implementation of the proposed beds will involve the beds described in items #1 and #2 above, focusing on ICU beds for which VHC anticipates the most immediate surge need. Phase II will implement the beds described in items #3 and #4 above, and Phase III will implement the beds described in item #5. VHC will provide notice to the Virginia Department of Health as temporary beds are brought online.

- **The plan for staffing the beds:**

VHC will recruit additional personnel on demand and in phases that coincide with the three implementation phases for the additional beds, as described above. Existing staff who usually practice in service areas that are now experiencing low utilization (such as surgery) will be redeployed to assist in VHC's COVID-19 efforts. Physicians and other clinicians with outpatient-focused practices will be used for hospital care. Additional personnel will be recruited through customary channels, including the internet and print advertising, and the many schools with which the VHC enjoys an educational affiliation. VHC does not anticipate an issue with recruiting additional staff, particularly given VHC's affiliations with many training and educational facilities in Northern Virginia and the District of Columbia.³

- **Supplies and Equipment Plan for Additional Beds:**

VHC's contingency plans establish procedures and guidelines for non-routine use of space, equipment, supplies, and staff. The main focus of contingency planning is to reallocate available resources from areas of low priority to those of high priority. VHC has already suspended non-urgent procedures that use the same ventilator circuits that are used for critical care. Additionally, VHC has already implemented measures to manage and allocate personal protective equipment and supplies through the 24/7 operation of our internal Command Center.

We are confident that VHC's contingency plans well-position VHC to stay ahead of patient needs and to optimize the use of limited space, staff, equipment, and supplies during exigent circumstances.

- **Describe Efforts Implemented and Ongoing to Increase Availability of Existing Beds:**

VHC is a key provider of acute care services in the Northern Virginia area, serving communities that are at significant risk of spread of the COVID-19 virus. As such, VHC has aggressively undertaken a comprehensive effort to maintain the safety and quality of care for its current patients while simultaneously preparing for the projected increase of COVID-19 patients. Specifically, VHC has already implemented a range of efforts to maximize clinical operations, including (i) converting all of VHC's ICU beds to negative pressure rooms (a total of 28 beds); (ii) an engineering solution that allowed conversion of the entire B-side of the hospital bed tower to negative pressure rooms (a total of 88 beds); (iii) creating a COVID-19

³ VHC has affiliations with the following schools: Marymount University, Northern Virginia Community College, George Mason University, Georgetown University, George Washington University, James Madison University, Catholic University, Shenandoah University, Stratford University, and Chamberlain University. The affiliations include consistent clinical and senior/capstone placements for students.

drive-through collection site for coronavirus testing; (iv) creating a COVID-19 "tented" assessment area adjacent to VHC's Emergency Department; (v) eliminating elective procedures; and (vi) temporarily adapting other types of VHC's licensed beds (such as available obstetric and pediatric beds) for use as Medical/Surgical beds or adult ICU beds, as necessary.

Thank you for your consideration of this request. Please let me know if you need any further information or if you have any questions about our request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adrian Stanton", written over the printed name.

Adrian Stanton
Vice President, Business Development & Community Relations
Virginia Hospital Center

cc: Dean Montgomery, Executive Director, Health Systems Authority of Northern Virginia

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