

VIRGINIA DEPARTMENT OF HEALTH
Office of Licensure and Certification
Staff Analysis

April 28, 2020

Bon Secours St. Francis Medical Center, LLC (4/22/2020)

Midlothian, Virginia

Temporarily add 33 Intensive Care Unit Beds at St. Francis Medical Center

Hospital

Bon Secours St. Francis Medical Center, LLC. (St. Francis) is located in Planning District (PD) 15, Health Planning Region (HPR) IV.

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), St. Francis operates an inventory of 130 beds (**Table 1**). St. Francis 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.

On April 13, 2020, the State Health Commissioner authorized St. Francis to temporarily add 39 beds (12 medical/surgical and 27 ICU) to its inventory in response to the COVID-19 crisis.

Request

St. Francis 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, St. Francis requests authorization to temporarily add an additional 33 ICU beds. The requested ICU beds will be located in the main emergency department on the St. Francis campus and at the Westchester Emergency Center in existing emergency room bays. The resulting bed configuration at St. Francis is shown in Table 1.

Table 1: St. Francis Requested Temporary Bed Inventory

Bed Type	Beds	Additional Beds Authorized 4/13/20	Requested Additional Beds	Resulting Available Beds
ICU	16	27	33	76
Medical/Surgical	93	12	0	105
Obstetric	21	0	0	21
Total	130	39	33	202

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:

St. Francis 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 suspended all elective procedures that, if delayed, are not anticipated to cause harm to the patient with exceptions and as provided below.

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

St. Francis has made assurances that it has the necessary professional staff to provide care in the additional beds. Staff in the emergency departments and 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. In addition, St. Francis has developed cross training programs and staff are being trained and oriented to potential new roles. Finally, St. Francis and Bon Secours will endeavor to work with members of the Virginia Medical Reserve Corps, if necessary.

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

St. Francis has made assurances that it has sufficient access to available medical supplies and personal protection equipment in the facility. As part of Bon Secours Mercy Health, St. Francis works with sister facilities in Richmond, Hampton Roads, and nationwide for access to all necessary medical supplies and PPE.

4. The specific plan for increasing bed capacity:

St. Francis requests authorization to temporarily add another 33 ICU beds. The requested ICU beds will be located in the main emergency department on the St. Francis campus and at the Westchester Emergency Center in existing emergency room bays. The additional licensed beds will either be used to care for COVID-19 patients directly or to supplement existing

operations so that existing beds can be used for COVID-19 patients, depending on the nature and timing of patient demand.

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

St. Francis intends to locate the requested ICU beds in the main emergency department on the St. Francis campus and at the Westchester Emergency Center in existing emergency room bays. The ICU beds will be located in spaces that are already in use for patient care. Accordingly, the spaces meet 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 Virginia Health Information (VHI), there are 3,448 licensed inpatient beds in PD 15, of which 368 are ICU beds. An additional 682 additional beds have already been authorized in PD 15 under the authority of Executive Order 52. 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 St. Francis,' and the area's, capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 15. St. Francis' supplemental proposal increases its normal bed capacity by 25%, and is a less than 1% increase in bed capacity in the planning district. More importantly, St. Francis' proposal increases its standing ICU inventory by 206% and PD 15's ICU inventory by 9%.

7. Other alternatives to adding bed capacity:

As discussed, given that St. Francis has already provided assurances that it has suspended all elective procedures, and the high bed occupancy rate, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 15, 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 14,339 positive cases of COVID-19, the illness caused by the virus, and 492 deaths¹. To date, the Centers for Disease Control and Prevention has confirmed 957,875 cases in the United States, with 53,922 deaths². Chesterfield Health District currently has 546 cases of patients with COVID-19, with an additional 961 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

St. Francis requests authorization to temporarily add another 33 ICU beds. The requested ICU beds will be located in the main emergency department on the St. Francis campus and at the Westchester Emergency Center in existing emergency room bays. The ICU beds will be located in spaces that are already in use for patient care. St. Francis 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 Division of Certificate of Public Need recommends the **approval** of Bon Secours St. Francis Medical Center, LLC's request to temporarily add another 33 bed at Bon Secours St. Francis Medical Center. This staff recommendation is based on the following findings.

1. St. Francis has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, St. Francis has an immediate need to temporarily add another 33 licensed inpatient beds.
2. St. Francis' plan for training and shifting ambulatory staff is a reasonable solution for staffing the additional beds.
3. St. Francis' plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis.
4. St. Francis' 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.