

April 10, 2020

Via email: azzie.conley@dhhs.nc.gov

Azzie Conley, Section Chief
NC DSHR Acute Care and Home Care Licensure and Certification

RE: Request by Carolinas Medical Center, License H0071 for Waiver of 10A NCAC 13B.3111 to Temporarily Increase Acute Care Bed Capacity to Care for COVID-19 Patients to the **Carolinas College of Health Sciences Building** on the campus of Carolinas Medical Center

Dear Ms. Conley,

Pursuant to the Memo issued by the North Carolina Department of Health and Human Services dated March 12, 2020 Acute Care hospitals licensed in the State of North Carolina may request a waiver of the limitations found in 10A NCAC 13B.3111. In addition, the Center for Medicare and Medicaid Services recently issued Interim Final Rule CMS-1744-IFC: *Policy and Regulatory Revisions in Response to the COVID-19 Public Health Emergency*, and associated guidance, pursuant to which CMS is waiving certain requirements under the Medicare conditions of participation at 42 CFR §482.41 and §485.623, and providing maximum flexibility for hospitals to utilize non-hospital buildings/space for patient care and quarantine sites, provided that the location is approved by the state (ensuring that safety and comfort for patients and staff are sufficiently addressed).

As you know, we have already submitted a waiver to increase bed capacity by 777 beds within the walls of Carolinas Medical Center license. Atrium Health's data modeling indicates that Charlotte-area hospitals will see a surge of thousands of COVID-19 patients in the next 3-5 weeks. Due to the expected surge, we do not believe the number of beds inside the hospital will be sufficient to meet patient need. We must act now to prepare alternative locations for patient care.

Accordingly, we are requesting approval to temporarily expand beds to the **Carolinas College of Health Sciences Building** (the "CCHS Building") located at 1200 Loop Road on the campus of Carolinas Medical Center. The CCHS Building is a one-story building containing approximately 30,000 square feet. Construction is underway to convert educational, lab and administrative space to accommodate acute care patients. Upfit will include standard drywall assembly where needed to define spaces and allow for entry/exit of patient beds. Temporary plumbing will also be installed to add bathrooms and handwash sinks. The building contains an active fire alarm system without sprinklers, but we are working closely with Mecklenburg County and Charlotte authorities to ensure compliance with applicable regulations and requirements. The space is built out with adequate water (hot and cold), HVAC, and electrical with backup generators. The building is on the same Duke Energy power feeds as CMC. The building is not equipped with medical gases, so a bottle system will therefore be required. The CCHS Building's close proximity to Carolinas Medical Center will allow for utilization of the hospital's food and environmental services.

We recognize that this is an extraordinary request. The CCHS Building does not meet the standards of our traditional acute care facilities. Nonetheless, we believe NCDHSR approval of our request is essential to our ability to accommodate COVID-19 patients.

Accordingly, I hereby certify as follows:

- Number of Additional Beds Requested: 160 (see chart below)
- Description of the physical space to be utilized: see chart below
- Purpose for which the space will be utilized: Care of patients receiving treatment for COVID-19 and/or to relocate other patients to allow for the treatment of COVID-19 patients.

LOCATION	# OF BEDS	DESCRIPTION OF SPACE
Carolinas College of Health Sciences Building on the campus of Carolinas Medical Center	160	Bed spaces separated by curtains.

- Anticipated duration: requesting waiver for 120 days

I hereby certify the following:

- 1) The increase in bed capacity is necessary for public health and safety in the geographic area served.
- 2) The physical facilities to be used are adequate to safeguard the health and safety of patients and staff.
- 3) All hospital patients will receive appropriate care and their health and safety safeguarded.

If you have specific questions or need more information regarding the space, please contact __Michael Painter at 704-578-7736 (mobile) or Michael.Painter@atriumhealth.org (email).

Please contact me at 704-607-8262 (mobile) or Chan.Roush@atriumhealth.org (email, if you have questions or concerns).

Sincerely yours,



D. Chan Roush
Facility Executive
Carolinas Medical Center