

April 14, 2020

Ben Steffen, Executive Director  
Maryland Health Care Commission  
4160 Patterson Avenue  
Baltimore, MD 21215

Renee Webster, Deputy Director  
Office of Health Care Quality  
7120 Samuel Morse Drive, Second Floor  
Columbia, MD 21046-3422

**RE: Anne Arundel Medical Center- Emergency Certificate of Need Application**

Dear Mr. Steffen and Ms. Webster:

On behalf of Anne Arundel Medical Center (AAMC), Inc. and pursuant to COMAR 10.24.01.20, I write to seek an Emergency Certificate of Need (CON) to expand our bed capacity by 162 beds by temporarily converting ambulatory offices, an unused cafeteria, and conference rooms on the campus of AAMC, located at 2001 Medical Parkway into acute inpatient beds.

As you are aware, in response to the novel coronavirus COVID-19 pandemic, the President of the United States declared a national state of emergency, the Secretary of Health and Human Services declared a public health emergency and on March 5, 2020 Maryland Governor Hogan issued a Declaration of State of Emergency and Existence of Catastrophic Health Emergency-COVID-19. On March 16, 2020, Governor Hogan issued an Executive Order calling on health care providers and facilities to respond to the health emergency and immediately increase statewide hospital capacity.

Project Description

AAMC is applying for an Emergency CON to expand bed capacity for the expected surge in hospital admissions related to COVID-19 infection and treatment. AAMC proposes to temporarily convert non-clinical areas and ambulatory clinical areas into 162 low-acuity, MSGA beds<sup>1</sup>. Our proposal is to open the beds identified herein in phases to meet the immediate future need, in order to optimize the efficiency of our care processes and costs. All beds described herein can be available within 28 days of receiving a CON, and are expected to be phased into use as shown, in accordance with patient census projections.

Clatanoff Pavilion

The Clatanoff Pavilion is part of our inpatient hospital located at 2001 Medical Parkway. The first floor of the Clatanoff Pavilion has a large, enclosed cafeteria space that is not in service at this time. AAMC plans to repurpose this area through minor interior construction, such as resurfacing floors, and mobilization of portable equipment and beds into up to 15 patient bays.

1. In addition to the beds requested within this CON, AAMC is planning to activate up to 224 inpatient MSGA beds located within the hospital through the conversion of space including several Operating Rooms, post anesthesia care units (PACUs), and an endoscopy unit. These changes can be made without a CON by seeking a temporary adjustment of bed licensure through the OHCQ.

#### Belcher Pavilion

The Belcher Pavilion is located on the AAMC campus at 2000 Medical Parkway, across the street from the inpatient hospital. The building contains ambulatory clinics, both operated by Anne Arundel Medical Group (AAMG) and independent medical practices, administrative offices, and a conference facility on the 7<sup>th</sup> floor. AAMC proposes to convert two of the AAMG ambulatory offices (on the 1<sup>st</sup> and 5<sup>th</sup> floors) as well as portions of the conference center into low acuity MSGA beds. The maximum capacity that can be achieved per floor and estimated cost for the projects is presented, below.

Proposed Unit	Maximum Number of Beds	Estimated Cost	Time from CON to Completion
Clatanoff 1 <sup>st</sup> Floor	15	\$200,000	By April 30, 2020
Belcher 1 <sup>st</sup>	50	\$250,000	By May 10, 2020
Belcher 5 <sup>th</sup>	30	\$150,000	By May 10, 2020
Belcher 7 <sup>th</sup>	67	\$900,000	By May 10, 2020
<b>Total AAMC Additional Beds</b>	<b>162</b>	<b>\$1,500,000</b>	

#### Field Hospitals

AAMC is in receipt of a CON for up to 6 temporary inpatient units in areas on hospital grounds. The units will be set up adjacent to the hospital (2001 Medical Parkway) or the Annapolis Exchange Pavilion (1997 Annapolis Exchange Parkway) once planning is complete. One of these units is able to function as early as April 17, 2020, and the remainder can be used within 7 days of delivery to the AAMC campus. AAMC has requested additional field hospital units, including one large-capacity, 80-bed unit. Should this unit become available, AAMC will request a CON or capacity approval through the Office of Health Care Quality, pursuant to guidance issued by the MHCC.

#### Inpatient Capacity and Surge

AAMC currently has 349 licensed beds and 396 physical inpatient beds. AAMC is planning to operationalize all our physical beds as well as other hospital space in order to meet the expected patient volumes associated with urgent and emergent medical care during this emergency. AAMC is requesting inpatient surge capacity through the OHCQ in addition to the aforementioned Field Hospitals and the 162 beds requested in this CON Application. All surge beds will be available for patient care by May 10, 2020.

#### Cost

The estimate of capital costs indicated above for each portion of our bed expansion includes any required facility work as well as the acquisition and deployment of all necessary equipment and should total no more than \$1,500,000. AAMC intends to use existing cash and available line of credit in the short term, as well as reimbursement from State/Federal/other sources as it becomes available.

AAMC seeks a waiver from the Executive Director or designee pursuant to COMAR 10.24.01.10A(2) such that: (1) the requirement under COMAR 10.24.01.20C for the Emergency CON applicant to file a formal CON application be suspended until at least thirty (30) days after the declared state of emergency of March 5, 2020 is terminated; and (2) that any Emergency CON granted pursuant to this Emergency



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CON application do not expire until thirty (30) days after the declared state of emergency of March 5, 2020 is terminated or 165 days after its issuance, whichever is later.

We respectfully ask you to act on this request as soon as possible so that we can begin work on this critically important project. Please let us know if you need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sherry B. Perkins', with a stylized flourish at the end.

Sherry B. Perkins, PhD, RN, FAAN  
President