

October 16, 2020

The Honorable Lisa Piercey, MD, MBA, FAAP  
Commissioner  
Tennessee Department of Health  
710 James Robertson Parkway  
Nashville, TN 37243

Re: Plan to Reinstitute Inpatient Services at Certain Ballad Health Hospitals

Dear Commissioner Piercey:

This is a response to your September 29, 2020 request for Ballad Health ("Ballad") to submit a plan for reinstatement of inpatient services at Hancock County Hospital, Unicoi County Hospital, and Hawkins County Memorial Hospital. Ballad originally requested, and the Tennessee Department of Health (the "Department") approved, a waiver of Section 4.03(a)(ii) of the Terms of Certification to allow the temporary suspension of inpatient services at these hospitals due to COVID-19. This temporary suspension allowed Ballad to redeploy the health system's staff and resources to meet the needs of the region during the outbreak. Given the persistence of the COVID pandemic, Ballad requested an extension of this waiver, which the state granted through October 31, 2020. The Department asked Ballad to provide our plan to reinstate inpatient services at Hancock County Hospital, Unicoi County Hospital and Hawkins County Memorial Hospital, including any plan of communication, at least 14 days prior to the termination of the extension.

Per the Department's request, our plans to reinstate inpatient services at Hancock County Hospital, Unicoi County Hospital, and Hawkins County Memorial Hospital are set forth below.

#### Hancock County Hospital

- Hancock County Hospital team members were notified on September 18<sup>th</sup> that they would be returning to their home-based facility.
- The week of October 12<sup>th</sup>, the Hancock County Hospital team members began reporting back to their home-based facility.
- On October 19, 2020, Hancock County Hospital will reopen for inpatient admissions.

#### Unicoi County Hospital

- Unicoi County Hospital team members were notified during the week of September 28<sup>th</sup> that they would be returning to their home-based facility.
- Beginning the week of October 19<sup>th</sup>, the Unicoi County Hospital team members will begin reporting back to their home-based facility.
- On November 1, 2020, Unicoi County Hospital will reopen for inpatient admissions.

### Hawkins County Memorial Hospital

During the temporary suspension of inpatient services, Ballad market leadership has had the opportunity to evaluate the model of care currently utilized at Hawkins County Memorial Hospital. Leadership looked at several factors including 1) the number of transfers out of Hawkins County Memorial Hospital to other facilities, 2) the average daily Emergency Department (ED) volume, 3) staffing and provider resources and 4) feedback from patients and community leaders.

After an in-depth evaluation and dialogue among stakeholders, Ballad has determined it is in the best interest of the community and patients to implement an integrated hospitalist model at Hawkins County Memorial Hospital. This model is currently utilized at four of Ballad's other hospitals - Hancock County Hospital, Dickenson Community Hospital, Unicoi County Hospital, and Johnson County Hospital.

Implementing this model at Hawkins County Memorial Hospital would allow our current ED provider, American Physician Partners, to serve as both ED provider and integrated hospitalist provider for an average daily inpatient/observation census of five to seven (5 – 7) patients. Prior to the temporary suspension of inpatient services, the hospital was averaging a daily census of six (6) during fiscal year 2020. The integrated hospitalist approach is a better utilization of provider resources and enhances the long-term viability of provider recruitment. The realized efficiencies will enhance the continuity of care with a more concentrated focus on primary care and outreach specialty clinic access to support the primary diagnoses admitted to the facility.

In order to implement this model at Hawkins County Memorial Hospital, we will need to relocate five (5) inpatient beds adjacent to the Emergency Department. This will require renovations to the existing space adjacent to the ED and allow for alignment of staffing between the ED and inpatient teams. The Department's Facilities Construction Director has determined that this project is within the scope of a "minor renovation" which requires architectural and engineering plans be submitted. Once the plans are submitted and final approval is granted, the estimated timeframe for construction completion is 6 – 8 weeks. This timeline would allow Ballad to reopen Hawkins County Memorial Hospital for inpatient admissions on January 1, 2021.

If volume demonstrates the need, Hawkins County Memorial Hospital will be able to add an additional seven (7) inpatient beds under this model with appropriate facility modifications. There would be no disruption to inpatient services if these "Phase II" modifications were pursued.

To accommodate this renovation schedule and minimize the impact on patients, Ballad is requesting an extension of the waiver for Hawkins County Memorial Hospital through January 1, 2021.

### Communication Plans

Internal communication to stakeholders has taken place for Hancock County Hospital and Unicoi County Hospital. An announcement of the formal re-entry plans for Hawkins County Memorial Hospital, if approved, would be communicated to team members in early November.

As for external communications, Ballad plans to communicate the reopening schedule for all three hospitals during Ballad's weekly COVID-19 press conferences which occur Wednesdays at 11am. These press conferences are covered by most of the region's press outlets and serve as an efficient and effective way of distributing updates to the community.

We appreciate your consideration of this request and thank you for your support as we work together to fight this pandemic. Please contact us if you have any questions regarding this matter.

Sincerely,



Alan Levine  
Chairman & CEO

cc: Herbert H. Slatery III  
Tennessee Attorney General and Reporter

Janet M. Kleinfelter  
Tennessee Deputy Attorney General

Judi Knecht, Interim COPA Director  
Tennessee Department of Health

Jeff Ockerman  
Tennessee Department of Health

The Honorable Norman Oliver, MD, MA, State Health Commissioner  
Virginia Department of Health

Erik Bodin, Director, Office of Licensure and Certification  
Virginia Department of Health

Allyson Tysinger  
Virginia Senior Assistant Attorney General

Larry Fitzgerald  
Tennessee COPA Monitor

Kevin Meyer, COPA Analyst  
Virginia Department of Health

Dennis Barry  
Southwest Virginia Health Authority

Tim Belisle, EVP & General Counsel  
Ballad Health

Karen Guske, SVP COPA Compliance Officer  
Ballad Health