



**AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES  
NATIONAL VETERANS AFFAIRS COUNCIL #53  
Affiliated with the AFL - CIO  
Mid-Term Bargaining Committee**

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June 8, 2005

Ronald E. Cowles, Associate Deputy Assistant Secretary  
Department of Veterans Affairs, Suite 215 (LMR)  
810 Vermont Avenue, N.W.  
Washington, D.C. 20420

Subject: Demand to Bargain – VA Pharmacies Implementation of Compounding Sterile Preparations (CSP) Standards USP Chapter 797

Dear Mr. Cowles:

In accordance with Article 44, Section 2 C, of the Master Agreement, the National VA Council #53 formally demanding to bargain over the cited subject above in the Department. The NVAC has been provided with vague information on what VA policy is on this subject. There is no VA Directive, VA Handbook or clear policy stating what VA would like to implement. No VA Management Official has signed off approving any recommendation or implementation dates of the CSP Work Group. If such documents, do exist they need be provided to NVAC. The Department has not provided the NVAC with the necessary information and /or data to fulfill our representational responsibility.

The ASHP Discussion Guide for Compounding Sterile Preparations has the following statement "However, any reader of this information is advised that the writer, reviewers, editors, ASHP, or Baxter are not responsible for the continued currency of the information, for any errors or omissions, and/or for any consequences arising from the use of the information in the document in any and all practice settings. Any reader of this document is cautioned that ASHP and Baxter make no representation, guarantee, or warranty, express or implied as to the accuracy and appropriateness of the information contained in this document, and will bear no responsibility or liability for the results or consequences of its use." It appears that VA is implementing USP/NF Chapter 797 standards based upon JACHO.

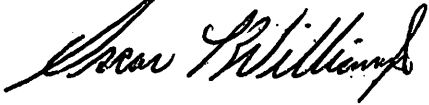
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Please provide NVAC with responses to the following questions.

- What is USP?
- Please provide a copy of the Federal law, or Government-wide regulation that gives USP Chapter 797 the weight of federal regulations as stated in the Compliance Information Paper.
- What process was VA Pharmacy using to meet JACHO expectations prior to USP Chapter 797?
- What changes are going to affect the working conditions of bargaining unit employees?
- What VA official has made to compliance mandatory?

Please cease and desist any implementation until the bargaining obligation has been met. If you have any questions please contact me at (217) 554-4866.

Sincerely,



Oscar L. Williams, Jr.  
Chairperson, Mid-Term Bargaining Committee  
2<sup>nd</sup> Executive Vice President  
National VA Council #53

cc: Alma L. Lee, President National VA Council #53  
Executive Committee, NVAC  
Bonnie M. Kerber, VHA HRM Consultant Group