

April 6, 2010

## INSPECTION OF VA ALL-HAZARD EMERGENCY CACHES BY THE EMERGENCY MANAGEMENT STRATEGIC HEALTH CARE GROUP

**1. PURPOSE:** This Veterans Health Administration (VHA) Directive establishes policy for the ongoing annual inspection of Department of Veterans Affairs (VA) All-Hazards Emergency Caches by the Emergency Management Strategic Health Care Group (EMSHG).

### 2. BACKGROUND

a. The VA All-Hazards Emergency Cache Program was established as a means for VA to maintain its health care delivery capability in the event of a natural disaster or intentional attack. The program provides a readily available supply of pharmaceuticals and medical supplies to treat Veterans, VA staff, and others who may be present at a VA medical facility in a disaster situation. Caches allow for short-term preservation of the VA health care infrastructure in a disaster situation.

b. The cache program is fully implemented. To ensure the readiness of VHA Pharmacy Cache, periodic inspections are required. The three key parameters of the cache inspection program are:

(1) Does the facility have a station-level policy regarding the activation and utilization of the cache that is consistent with VHA policy concerning All-Hazards Emergency Caches?

(2) Is the cache stored and secured in a manner consistent with current VHA policy?

(3) Are the cache's controlled substance inventory narcotics integrated into the facility's monthly controlled substance inspection process?

c. Cache inspections are an added responsibility of the EMSHG Area Emergency Managers (AEMs). In some instances, cache inspections may be conducted by EMSHG Regional Emergency Managers (REM). EMSHG AEMs, located across the nation, are focused on emergency management and planning. They annually perform a physical inspection of the caches within their assigned geographic area using standardized criteria (see Attachment A). EMSHG AEMs perform this added duty in the context of the overall emergency management plan for the facility, Veterans Integrated Service Network (VISN), and VHA.

d. Pharmacy Benefits Management (PBM) Emergency Pharmacy Service (EPS) and VISN Pharmacist Executive consultants are readily available for expert advice.

**3. POLICY:** It is VHA policy that each VA All-Hazards Emergency Cache must be inspected annually by an EMSHG AEM. *NOTE: The checklist for inspection criteria is in Attachment A.*

**THIS VHA DIRECTIVE EXPIRES ON MARCH 31, 2015**

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### 4. ACTIONS

a. **Liaison AEM.** The liaison AEM for each VISN must develop a plan to ensure that each cache in their area of responsibility is inspected on an annual basis.

b. **Inspecting AEM.** The inspecting AEM must utilize the approved criteria in Attachment A as the foundation for the inspection.

(1) It is important that the inspecting AEM considers the general principles of emergency management and performs the inspection with the VHA, VISN and facility Emergency Management Plans in mind.

(2) Within 1 week of completion of a cache inspection, the inspecting AEM must send a draft inspection report to the local facility Director. This allows the local facility Director an opportunity to provide input towards the final report and to submit a report of any corrective action for the deficiencies that may have been discovered.

(3) The AEM must send the final inspection report to the respective EMSHG REM, VISN Director, the local facility Director, and PBM EPS no later than 2 weeks after the date of the inspection.

c. **REM.** The REM must submit an annual report of all cache inspections within their region to the Chief Consultant, EMSHG. The annual report is reviewed by the Chief Consultant, EMSHG then forwarded to the Chief Public Health and Environmental Hazards Officer (13). The Chief Public Health and Environmental Hazards Officer provides the results to the Associate Chief Consultant, Emergency Pharmacy Service, and the Deputy Under Secretary for Health for Operations and Management (10N), and to the Under Secretary for Health (10).

d. **PBM EPS.** PBM EPS serves as the subject matter experts for this inspection process and must collaborate with EMSHG to resolve any deficiencies that are identified. PBM EPS, at the request of EMSHG, a VISN office, or a local facility, provides follow-up site inspections to further evaluate the need for corrective action(s); provides guidance to remedy identified deficiencies; and documents that the necessary corrective actions have been taken.

### 5. REFERENCES:

a. VHA Emergency Management Program Guidebook, 2009  
<http://vaww1.va.gov/EMSHG/page.cfm?pg=154>. *NOTE: This is an internal VA web site not available to the public.*

b. VHA Handbook 1108.1  
[http://vaww1.va.gov/vhapublications/ViewPublication.asp?pub\\_ID=1171](http://vaww1.va.gov/vhapublications/ViewPublication.asp?pub_ID=1171). *NOTE: This is an internal VA web site not available to the public.*

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**6. FOLLOW-UP RESPONSIBILITY:** The Chief Consultant, EMSHG (13C) is responsible for the content of this Directive. Questions may be addressed to (304) 264-4825.

**7. RESCISSIONS:** VHA Directive 2004-046, dated August 24, 2004, is rescinded. This VHA Directive expires March 31, 2015.

Robert A. Petzel, M.D.  
Under Secretary for Health

Attachment

**DISTRIBUTION:** E-mailed to the VHA Publications Distribution List 4/9/2010

ATTACHMENT A

**Emergency Medical Strategic Healthcare Group (EMSHG) Pharmacy Cache Inspection Checklist**

<b>VA Medical Facility:</b>	<b>EMSHG Representative:</b>	<b>Month/Date/Year:</b>		
<p><b>Goal:</b> The VA Medical Center will have a written emergency plan that depicts procedures for the storage of a cache of pharmaceuticals, equipment and medical supplies reserved specifically for the treatment of casualties from a mass casualty event, also known as "VA All-Hazards Emergency Caches."</p>				
<b>Objective 1- Facility Plans/Policy/Procedures</b>		<b>Yes</b> Satisfactory	<b>No</b> Needs Improvement	<b>N/A</b> Not Applicable
Policy/Procedures address at a minimum the following elements:				
<p><b>1.1</b> Is the local Pharmacy Cache policy in compliance with VHA Directive 2008-001? The following should be included in the policy:</p> <p>A. Does the written local policy describe procedures for the storage, handling, and inspection of a cache of pharmaceuticals, equipment and medical supplies reserved specifically for the treatment of casualties from an "All Hazards Event"?</p> <p>B. Does the policy describe how the facility will function with on-hand stocks for at least 24 to 48 hours or longer?</p> <p>C. Does the policy describe how provisions are made to prepare and provide medication and supplies during a mass casualty event to a large influx of casualties?</p> <p>Local Policy #: _____ Date: _____</p> <p>■ Note: The operating procedures ensure that all caches are continuously maintained and ready for immediate utilization.</p>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>1.2</b> Does the policy address a designated liaison to assist the Pharmacy Benefits Manager Emergency Pharmacy Service (PBM EPS) with the stock rotation program, cache inventory requirements, and accountability of the caches?</p>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>1.3</b> Does the policy describe who can activate the cache?</p> <p>■ Note: VA facility Director is responsible for activating the cache</p>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>1.4</b> Does the policy incorporate the immediate notification of EPS and EMSHG when cache is activated?</p>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>1.5</b> Does the facility's Emergency Management Plan (EMP) incorporate the access, distribution, and use of the cache?</p>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>1.6</b> Does the policy establish stock rotation of cache supplies?</p>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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<p><b>1.7</b> Does local policy require an annual exercise be conducted that simulates activation and deployment of the cache in response to specific local hazards as identified in the Hazardous Vulnerability Assessment (HVA)? Included in the annual exercise will be a post drill review.</p> <p>Date of most recent exercise: _____</p> <p>Scenario: _____</p> <p>➤ Note: Examples include: annual emergency preparedness drills, table top reviews, or other exercises that will assist facilities in ensuring that issues such as cache storage, security, movement, location, training, and operability are considered.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>1.8</b> Does the policy describe inspections and inventory documentation requirements in accordance with criteria established by PBM EPS?</p> <p>➤ Note: Inspections of the cache include a weekly visual inspection of the cache space to ensure security and environmental requirements are still intact.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>1.9</b> Does the policy require training for emergency personnel on use of medical supplies and equipment contained in the cache?</p> <p>➤ Note: Providing all necessary training for emergency personnel, as appropriate, on use of medical supplies and equipment contained in the cache.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Objective 1- COMMENTS ON ANY ITEM NEEDING IMPROVEMENT:</b></p>			
<p><b>Objective 2- Physical Security</b></p> <p>Procedures address at a minimum the following processes:</p>	<b>Yes</b> Satisfactory	<b>No</b> Improvement Needs	<b>N/A</b> Not Applicable
<p><b>2.1</b> Is there an electronic security system covering the cache space?</p> <p>➤ Note: Electronic Access Control Security System. The ability to provide for periodic or on demand print out of names and time and/or dates of individual accessing.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>2.2</b> Is the cache space in a climate-controlled environment with room temperature between 59 to 86 degrees Fahrenheit (15 degrees and 30 degrees Celsius)?</p> <p>Temperature. Environmental controls must be in place to ensure that the temperature in the cache storage area is maintained.</p> <ol style="list-style-type: none"> <li>1) The cache space must contain a thermometer.</li> <li>2) A log of weekly temperature reading is maintained and stored in the cache space.</li> <li>3) All cache items that need refrigeration must be stored in the refrigerator provided and set at the proper temperature.</li> </ol> <p>A log of weekly refrigerator temperature reading is maintained/stored in cache space.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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<p><b>2.3</b> Is the pharmacy cache area in compliance with current fire and safety codes?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>2.4</b> Is the area equipped with Motion Intrusion Detectors?</p> <p>1) Features. Intrusion detectors must have the following essential features:</p> <ul style="list-style-type: none"> <li>a. An internal, automatic charging DC standby power supply and a primary AC power operations.</li> <li>b. A remote, key-operated activation and deactivation switch installed outside the adjacent to the room entrance door frame and/or a central alarm ON-OFF control in the office.</li> <li>c. An automatic reset capability following intrusion detection.</li> <li>d. A local alarm level of 80 decibels (dB) (minimum) to 90 dB (maximum) within configuration of the protected area.</li> <li>e. An integral capability for the attachment of wiring for remote alarm and intrusion indicator equipment (visual or audio).</li> <li>f. A low nuisance alarm susceptibility</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>2.5</b> Is the cache located within a physically secure environment?</p> <p>1) Other Room Access Means</p> <ul style="list-style-type: none"> <li>a. Interstitial overhead areas which enable entry into a secure room from an unsecured room must be barricaded by the installation of a suitable partition in the interstitial space which prevents "up and over" access.</li> <li>b. Ventilation grills on doors and air circulation ducts which exceed 0.06 m2 (100 square inches) in areas must be reinforced to prevent their removal from outside the room. Other access means such as dumbwaiter shafts, roof or wall ventilator housings, trapdoors, etc. must be secured by appropriate means.</li> </ul> <p>2) Doors and Door Locks.</p> <ul style="list-style-type: none"> <li>a. Doors are of 45 mm (1 and 3/4 in.) hardwood or hollow steel construction.</li> <li>b. Dutch or half doors are unacceptable.</li> <li>c. Removable hinge pins on door exteriors must be retained with set pins or spot-welded, preventing their removal.</li> <li>d. All doors must be fitted with two lock sets.</li> <li>e. Glass doors or doors with glass panes must have one lock set, key operated from the interior of the protected area.</li> <li>f. If a door is not set in a steel frame, one of the two locks must be a jimmy proof rim dead lock.</li> <li>g. Doors set in steel frames must be fitted with a mortise lock with a deadlock pin feature. One lock (the day lock) must be automatically locking on the door closure, requiring re-entry to the room with key or lock combination and allowing egress from the room by use of an inside thumb latch.</li> <li>h. The day lock on the main door must be automatically locking, with a minimum 19 mm (3/4 in.) dead bolt and inside thumb latch. Combinations or keys to day locks must be restricted to service employees and combinations changed immediately on the termination or reassignment of an employee.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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<p><b>2.6</b> Is there a process in place to document completion of weekly visual inspections and inventories?                  A. Inspections of the cache include a weekly visual inspection of the cache space to ensure security and environmental requirements are still intact.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Objective 2- COMMENTS ON ANY ITEM NEEDING IMPROVEMENT:</b></p>			
<p><b>Objective 3 – Controlled Substances Accountability &amp; Shelf Life Extension Program (SLEP) Labels</b>                  Procedures that address at a minimum the following processes:</p>	Satisfactory <b>Yes</b>	Improvement Needs <b>No</b>	Not Applicable <b>N/A</b>
<p><b>3.1</b> Is the cache Morphine – (C-II narcotic), stored in pharmacy vault or safe?                  ■ Note: Any cache C-II or C-II items must be stored in a vault or safe in compliance with title 21, Code of Federal Regulations (CFR) Part 1300</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>3.2</b> Is the cache morphine inspected as per inspection and inventory requirements;                  1) Morphine- DEA schedule II, is the same as C-II.                  2) Inspect every 72 hours. If contained in green totes, seals do not have to be broken and can be visually verified.                  3) Inspect every week, <u>only if a Controlled Substance Waiver has been obtained</u>, visually verify seals. Inspect every month, during the unannounced controlled substance inspection, visually verify seals. Inventory every quarter, a <b>physical count</b> (seals broken) must be conducted (1<sup>st</sup> month).</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>3.3</b> Is the cache Diazepam and Lorazepam stored and inspected as per inspection and inventory requirements?                  1) Inspect every week; perform a visual inspection of the cart seal.                  2) Inspect every month, during the unannounced controlled substance inspection, visually verify seals.                  3) Inventory every quarter, a <b>physical count</b> (seals broken) must be conducted (1<sup>st</sup> month).</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>3.4</b> Are all controlled substances in the cache included in the Drug Enforcement Agency's (DEA's) required biennial inventory?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>3.5</b> Are all shelf life extended pharmaceuticals labeled according to directions and are SLEP labels stored in the appropriate EPS cart/location?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Objective 3- COMMENTS ON ANY ITEM NEEDING IMPROVEMENT:</b></p>			