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April 23, 2012

W. Craig Fugate

Administrator

Federal Emergency Management Agency (Room 832)

500 C Street, SW

Washington, D.C. 20472-3100

Dear Mr. Fugate:

On behalf of the American Academy of Pediatrics (AAP), a professional organization of 62,000 primary care pediatricians, pediatric medical subspecialists, and pediatric surgical specialists dedicated to the health, safety, and well-being of infants, children, adolescents, and young adults, I write to commend you on FEMA's working draft of "Post-Disaster Reunification of Children: A Nationwide Approach" and thank you for the opportunity to comment.

Children represent approximately 25 percent of the nation's population and are uniquely vulnerable in the case of an emergency. As evidenced during past disasters, the separation of children from parents and guardians is a serious problem that must be addressed before, during, and after a disaster. We commend FEMA for creating a thoughtful and thorough guide on family reunification that envisions a role for nonprofit entities as well as governments at the local, state, and federal level. The working draft is an excellent first step in addressing reunification of children after a disaster. In particular, the recognition of the unique needs of children with disabilities or chronic illness is critical and should be maintained as the document undergoes any further revision.

The Academy also would welcome the inclusion of additional specific recommendations for pediatricians, other health care providers, and hospitals to prevent and mitigate the situations where children are separated from parents or caregivers. If children need emergency medical care after a disaster, they most likely will be taken to a hospital, and it is important that hospitals and health care providers know what information they legally can share and with whom. The importance of protecting children and their privacy must be balanced with efforts to reunify families. Further guidance to maximize the ability of hospitals and health care providers to assist in family reunification would be helpful. For instance, if hospitals and health care professionals are able to share information with federal, state, and local government officials as well as law enforcement, it might speed the reunification of children with parents and caregivers.

Pediatricians, who regularly see children and parents in their offices, are uniquely situated to discuss the importance of having an emergency plan with families. Additionally, pediatricians should be included in disaster planning at all levels of

government and should be involved in offering expertise and training to first responders who will be responsible for children in a disaster but may not have specific pediatric training or knowledge.

While we recognize that the working draft pertains to children who are separated from parents or guardians, it is important that the document also state clearly that every attempt should be made to keep children with their families. Children should not be separated from their families or caregivers to the maximum extent possible during evacuation, transport, sheltering, or the delivery of other services. During past disasters, children and families have been separated for treatment and shelter, but children typically receive more appropriate and more effective care when they remain accompanied by a parent or other caregiver. Preventing children from being separated from parents or other caregivers during a disaster must remain our shared priority.

Thank you for your continued commitment to meeting the needs of children. If the Academy can be of help to you, please do not hesitate to contact Betsy Dunford in AAP's Department of Federal Affairs at 202-347-8600.

Sincerely,

/s/

Robert W. Block, MD, FAAP
President

RWB/bd