



The U.S. Breastfeeding Committee (USBC) submits the following comments in response to the request for information (RFI) regarding proposed revisions to the Federal Emergency Management Agency (FEMA) Public Assistance Program and Policy Guide (PAPPG) Version 5 under Docket ID FEMA-2024-0010.

The USBC is a coalition bringing together ~140 organizations from coast to coast representing the grassroots to the treetops – including federal agencies, national, state, tribal, and territorial organizations, as well as for-profit businesses – that support the USBC mission to create a landscape of breastfeeding support across the United States. We are committed to ensuring that all families in the U.S. have the support, resources, and accommodations to achieve their breastfeeding goals in the communities where they live, learn, work, and play, including during emergencies and disasters.

The USBC-affiliated Infant & Young Child Feeding in Emergencies Constellation brings together organizations to work through an equity lens to focus on disaster preparedness systems, relief, and emergency response plans to equitably protect, promote, and support infant and young child food safety and security. This group recognizes that active support and coordination between federal, state, and local governments, the commercial milk formula industry, lactation support providers, and all other relevant actors involved in response to emergencies is critical to ensuring safe infant and young child feeding practices and equitable access to support.

This intentional coordination is essential, as infants and young children are among the most vulnerable in an emergency, and breastfeeding saves lives. Human milk contains antibodies that fight infection, including diarrhea and respiratory infections common among infants in emergency situations. Human milk is always clean, and in most cases requires no fuel, water, or electricity, and is available, even in the direst circumstances. For additional information, please see the [Joint Statement on Infant and Young Child Feeding in the Context of the Infant Formula Crisis and Ongoing COVID-19 Pandemic](#).

With this in mind, the USBC requests the following changes to the version 5 revisions to the Public Assistance Program and Policy Guide (FP 104-009-2):

- Line 3043: Add “activities of daily living and/or” before “the treatment,” so it reads “Durable medical equipment is reusable medical equipment necessary for activities of daily living and/or the treatment of an illness or injury, or to prevent a patient’s further deterioration.”
- Line 3050: Add “utilized” before “ingested” so it reads “Consumable medical supplies are medical supplies that are utilized, ingested, injected, or applied or are for one-time use only, including, but not limited to:”
- Line 3186: Add “breastfeeding/lactation supplies” before “infant formula,” so it reads “Breastfeeding/lactation supplies, infant formula, baby food, and diapers”

- Line 3208: Add “all” before “survivors” and “including those” before “disabilities” so it reads “Care for all survivors, including those with disabilities or access and functional needs, including the provision of the following personal assistance services:”
- Line 3210: Add “/feeding” after “eating” so it reads “Grooming, eating/feeding, walking, bathing, toileting, dressing, and undressing;”
- Line 3213, add “human milk/breast milk and” before “medications” so it reads “Assisting with self-administering human milk/breast milk and medications; and”

Protecting and supporting breastfeeding before, during, and after emergencies holds enormous potential to save lives and improve public health. The USBC and our network stand ready to provide additional feedback and context. Thank you for providing an opportunity to submit feedback. Please direct any questions to office@usbreastfeeding.org.

Sincerely,



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