

United States Senate

February 7, 2020

VIA ELECTRONIC DELIVERY

The Honorable Steve Dickson
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20591

Dear Administrator Dickson:

As you know, Section 307 of the FAA Reauthorization Act of 2018 (Public Law No. 115-254) requires the Federal Aviation Administration (FAA) to evaluate regulations regarding emergency medical equipment on passenger aircraft. We are writing to urge you to implement regulations to require all Part 121 certified aircraft to include epinephrine auto-injectors in the onboard emergency medical kits.

Last year, the Aerospace Medical Association (AsMA) recommended that the FAA require commercial aircraft to include epinephrine auto-injectors in their onboard medical kits. While existing regulations ensure onboard medical kits include epinephrine, there is no clear direction to airlines that aircraft should include auto-injectors in order to reduce opportunities for misuse or overdose. Epinephrine auto-injectors are designed for use by a layperson, with some brands including step-by-step directions. This is particularly important given that peanuts or food containing peanuts remains available for purchase on certain airlines.

Food allergies afflict a significant segment of the population. A 2019 study published in the *Journal of the American Medical Association (JAMA) Network Open* found a far higher prevalence of food allergies among American adults than previously revealed. About 10.8 percent – or 26 million – reported having a convincing food allergy and according to a 2018 study published in *Pediatrics*, another 5.6 million children also suffer from food allergies.


According to leading food allergy expert, Dr. Kari Nadeau, associate professor at Lucile Packard Children's Hospital and Stanford University School of Medicine, 40 to 45 percent of individuals with food allergies do not carry epinephrine auto-injectors. This can lead to life threatening situations, especially aboard aircraft. For example, a doctor aboard a Delta Airlines flight in 2019 helped save the life of a 26-year-old passenger experiencing anaphylactic shock. Thankfully, the doctor's training and experience allowed him to successfully administer epinephrine without incident; however, this outcome would have been far less likely in the hands of a layperson.

We are pleased to see that the FAA is sharing AsMA's recommendations with Part 121 air carriers in its recent Information for Operators but strongly encourage the FAA to take the next step and move forward with an official rulemaking process. With the prevalence of food allergies continuing to rise, and many airlines and airports serving common allergens, it is crucial to ensure that all passenger aircraft have the necessary tools to keep passengers safe. We appreciate your consideration of this request and look forward to working with you to protect Americans with these life-saving medical devices.

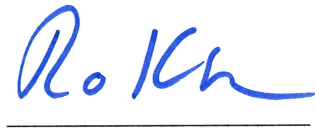
Sincerely,



Tammy Duckworth
United States Senator



Charles E. Schumer
United States Senator



Ro Khanna
Member of Congress