

May 21, 2025

The Honorable Michael Benedetto
Committee on Education
LOB 835
Albany, NY

Dear Chair Benedetto,

On behalf of the Asthma and Allergy Foundation of America (AAFA), we write to express our support for the intent of A 2648. This bill would amend the Education and Public Health Law to designate all elementary and secondary schools as public access epinephrine auto-injector providers. Schools would be required to maintain and regularly test their epinephrine auto-injectors, notify their regional EMS council of the devices they carry, and clearly display signs indicating the storage location of the auto-injectors.

Approximately 5.8 percent of children and adolescents in the United States have food allergies—equivalent to at least one student in every New York classroom.¹ Exposure to a food allergen can lead to severe and potentially fatal reactions, including anaphylaxis. Because there is no cure for food allergies, prevention, awareness, and immediate access to emergency treatment are essential to saving lives. Epinephrine is the only first-line treatment for anaphylaxis.

While we strongly support the intent of this legislation, we recommend amending the bill's language to authorize the use of any FDA-approved epinephrine delivery method in schools—not just auto-injectors. Many existing stock epinephrine laws were drafted when injection was the only available option. There have been and will continue to be innovations in the delivery of epinephrine. In 2024, the FDA approved the first epinephrine nasal spray and is currently reviewing an epinephrine sublingual film. The FDA will play its role in determining the safety and efficacy of these systems, but once approved, New York schools should have the option of determining which delivery systems to use.

¹ Centers for Disease Control and Prevention. (2023, January 26). *More than a quarter of U.S. adults and children have at least one allergy* [Press release].



Asthma and Allergy
Foundation of America

The enactment of this bill is a vital step to ensure that children are administered epinephrine in a timely manner, thus saving lives in New York elementary and secondary schools. We also urge an amendment of the language to be more inclusive of all FDA-approved epinephrine delivery methods.

Sincerely,

Kenneth Mendez
President and Chief Executive Officer
Asthma and Allergy Foundation of America