



Post-Disaster Reunification of Children: A Nationwide Approach

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CHILDREN

Acknowledgements

Post-Disaster Reunification of Children: A Nationwide Approach illustrates the significance of whole community collaboration and inclusive emergency planning by providing a comprehensive overview of the coordination processes necessary to reunify children separated from their parents or legal guardians in the event of a large-scale disaster *and* reflects how the whole community—to include nongovernmental organizations such as Voluntary Organizations Active in Disaster, faith-based and community organizations, disability and pediatric organizations, Federal and private sector partners, and civic action committees—can work together to achieve one wide ranging mission.

Reunifying unaccompanied minors and separated or missing children with their parents or legal guardians in the aftermath of a disaster is a priority. Accomplishing this goal requires the efficient, coordinated use of resources and efforts from across the whole community and all levels of government. This document reflects our Nation’s first attempt to establish a holistic and fundamental baseline for reunifying children separated as a result of a disaster and aims to assist local, state, tribal, territorial, and insular area governments and those responsible for the temporary care of children, such as educational, child care, medical, juvenile justice, and recreational facilities, in enhancing the reunification elements of existent emergency preparedness plans and/or conducting new all-hazards reunification planning.

Any project of this scope entails the participation, assistance, and cooperation of many individuals. Whole community stakeholders from across the country were engaged in and supported the development of this document, including local, state, and Federal partners, nongovernmental organizations, emergency managers, pediatric and disability experts, the private sector, and other applicable stakeholders. A warm thank you goes out to them for their time, efforts, and pivotal support.

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Introduction

Amid the chaos of a natural, technological, or human-caused disaster, there is an increased possibility for children to become separated from their parents or legal guardians. This separation could occur during the evacuation or sheltering process, or because children who are located in a child care, educational, medical, juvenile justice, recreational, or other facility may be unable to reconnect with their parents or legal guardians.

Following Hurricanes Katrina and Rita in 2005, the National Center for Missing and Exploited Children's (NCMEC's)¹ hotline for those events received over 34,000 calls.² Children comprise approximately 25 percent of the Nation's population. On any given weekday, an estimated 67 million of them are in schools and child care, and may be particularly vulnerable because they are away from their families. Studies have shown that 63 percent of parents would disregard an evacuation order and go directly to their child's school in an attempt to collect their children, even if they have received instructions to do the opposite. When parents are familiar with the emergency plans of their children's temporary care providers, including the reunification components, they are more likely to follow evacuation and shelter-in-place orders, making everyone safer.³

Reunifying unaccompanied minors and separated or missing children with their parents or legal guardians in the aftermath of a disaster is a priority.⁴ Accomplishing this goal requires the efficient, coordinated use of resources and efforts from across the whole community at the local, state, regional, and national levels.⁵ By understanding approaches to reunification from across the whole community, jurisdictions will be able to further develop and enhance the reunification elements of their emergency preparedness plans.

Outreach and collaboration with a broad stakeholder group has shown that communities are looking for more information on available resources and promising practices to help them further develop the way their emergency preparedness plans address reunification.

This document is designed to support those efforts. It was created to support overall reunification processes and procedures by establishing a fundamental baseline, assisting in identifying the roles of lead and supporting agencies and organizations, and serving as a tool to enhance reunification elements of existent emergency preparedness plans and/or help guide the development of new all-hazards reunification plan elements and procedures. This document should assist in the development of reunification planning elements that are inclusive, considering those children who may be unable to verbalize who they are and/or relay any other

¹ Federal law authorizes NCMEC to provide free services to families as the Nation's clearinghouse for missing and sexually exploited children. Many of NCMEC's authorized services are listed in 42 U.S.C. § 5773.

² Sarita Chung and Michael Shannon, "Reuniting Children with Their Families During Disasters: A Proposed Plan for Greater Success," *American Journal of Disaster Medicine*, 2007.

³ Irwin Redlener, Roy Grant, David Abramson, and Dennis Johnson, "Why Parents May Not Heed Evacuation Orders and What Emergency Planners, Families and Schools Need to Know," 2008.
http://www.ncdp.mailman.columbia.edu/files/white_paper_9_08.pdf

⁴ A separated child is a child who is separated from both parents or from his/her previous legal or customary primary caregiver, but not necessarily from other relatives, while an unaccompanied child is a child who has been separated from both parents and other relatives and is not being cared for by an adult who, by law or custom, is responsible for doing so. See Annex E: Definitions for additional detail.

⁵ For the purposes of this document, "local and state" includes tribal, territorial, and insular area governments.

essential information, and should also recognize the needs of children with disabilities and other access and functional needs, including hearing and visual impairments. This document focuses solely on the reunification of children separated from their parents or legal guardians following a disaster. Planned next steps include developing other materials that comprehensively address the reunification of all disaster survivors.

Overall, this document, along with other national preparedness doctrine (e.g., the National Response Framework [NRF], and National Disaster Recovery Framework), provides another tool for achieving our National Preparedness Goal of a more secure and resilient Nation to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk.⁶

For the purposes of this document, **reunification is defined as the process of assisting displaced disaster survivors, including children, in voluntarily reestablishing contact with family and friends after a period of separation.** Throughout the document, web links are provided for reference and further information. All referenced web sites are active as of May 2012.

Background

In October 2006, the President signed into law the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA),⁷ modifying the organizational structure, authorities, and responsibilities of the Federal Emergency Management Agency (FEMA). PKEMRA and the Stafford Act⁸ mandated that the National Emergency Child Locator Center (NECLC) be established within the NCMEC and that procedures be put in place to facilitate the identification and reunification of displaced children with their families. NCMEC, established in 1984 as a private, nonprofit 501(c)(3) organization, serves as the Nation's resource center on the issues of missing and sexually exploited children and provides services nationwide for law enforcement, families, and professionals in the protection of abducted, endangered, and sexually exploited children.⁹

Pursuant to the Kids in Disaster Well-being, Safety, and Health Act of 2007,¹⁰ the National Commission on Children and Disasters (Commission) was established in December 2007 by the President and Congress. The Commission was charged with conducting an independent and comprehensive study to identify gaps in the Nation's disaster planning, preparedness, response, and recovery for children, and to submit a report providing recommendations for closing those gaps. The Commission delivered an interim report to the President and Congress in October 2009, and then a final report in October 2010.¹¹ In August 2009, FEMA, in collaboration with many other Federal partners and nongovernmental organizations (NGOs), began to work closely with the Commission to address their recommendations, where applicable, and ensure that the

⁶ Department of Homeland Security, *National Preparedness Goal*, September 2011.
<http://www.fema.gov/pdf/prepared/npg.pdf>.

⁷ Pub. L. No. 109-295

⁸ Section 689(b) of the Robert T. Stafford Disaster Relief and Assistance Act, Pub. L. No. 93-288, as amended.

⁹ NCMEC Web site. <http://www.missingkids.com>.

¹⁰ Pub. L. No. 110-161

¹¹ National Commission on Children and Disasters, *2010 Report to the President and Congress*, October 2010.
<http://www.acf.hhs.gov/ohsepr/nccreport/index.html>.

needs of children were considered and integrated into overall disaster planning, preparedness, response, and recovery efforts initiated at the Federal level.

Included in the Commission's report was a recommendation that efforts be made to strengthen the mechanisms for collecting data, expanding information sharing capabilities, and creating a central database where information pertaining to unaccompanied minors could be stored. This recommendation prompted the development of the Unaccompanied Minors Registry (UMR) which supports the ability to collect, store, report, and act on information related to children missing or lost as a result of a disaster. This newly created tool is administered by the NCMEC during disasters to gather and share information with, and provide technical assistance to, local law enforcement and assist in the reunification of displaced children with their parents or legal guardians.¹² Additionally, data within the tool can, through proper channels, be used by local and state emergency managers, as well as other reunification stakeholders to assist with reunification efforts, planning, and strategies. The UMR remains active at all times, even when not in use for a specific disaster.

Through the Commission, the U.S. Department of Homeland Security (DHS)/FEMA, U.S. Department of Health and Human Services (HHS), U.S. Department of Justice (DOJ), and U.S. Department of Education have collaborated closely to address the disaster related needs of children. They have strengthened existing relationships and have worked together to support local disaster operations by coordinating and connecting local, state, and Federal primary points of contact whenever and wherever necessary.

¹² Team Adam and Project ALERT—comprising retired law enforcement professionals with years of investigative experience at the Federal, state, and local levels—will provide rapid, onsite assistance to law enforcement agencies and families in reuniting unaccompanied minors with their families or legal guardians.

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Purpose, Applicability, and Scope

Most incidents begin and end locally and are managed at the local level. When the demands of the disaster exceed the capacity of local governments, they may seek or be offered assistance from the state to enhance and supplement their response capabilities. In home rule states, local governments maintain control of disaster response operations and the state will only respond once a formal request for assistance has been issued (see Annex E: Definitions). However, many states will take a proactive readiness posture rather than simply waiting for requests to be issued. The Federal Government will do the same, remaining ready to support local and/or state response efforts if and when help is officially requested.¹³ In the event that a disaster crosses state and/or international borders (cross-borders) there will likely be a need for additional coordination, support, and clarification of legal authorities. Roles, responsibilities, and procedures often vary from state to state and even among local jurisdictions within each state, so it is important that the lines of authority for displaced children within a given jurisdiction are clarified before a disaster strikes.¹⁴

This document is not legally binding and does not establish requirements for state, local, Federal or private sector entities. It aims to provide a comprehensive overview of the coordination processes necessary to reunify unaccompanied minors with their parents or legal guardians following a large-scale disaster. This document reflects how the *whole community*—to include NGOs such as Voluntary Organizations Active in Disaster, faith-based and community organizations, disability and pediatric organizations, private sector partners, and civic action committees—can support local, state, and Federal efforts of reunifying unaccompanied minors with their parents or legal guardians in the aftermath of a disaster.¹⁵

“Whole Community is a means by which residents, emergency management practitioners, organizational and community leaders, and government officials can collectively understand and assess the needs of their respective communities and determine the best ways to organize and strengthen their assets, capacities, and interests.”

—*A Whole Community Approach to Emergency Management: Principles, Themes, and Pathways for Action*

This document aspires to:

1. Assist local and state governments in determining processes, communication lines, and the identification of roles necessary to facilitate the expeditious reunification of children with their parents or legal guardians in the aftermath of a disaster.
2. Encourage stakeholders and community leaders to develop and build upon existent relationships in an effort to collaborate and communicate more efficiently and effectively in

¹³ The NRF Resource Center Web site is a useful source for additional information on this topic. <http://www.fema.gov/emergency/nrf/>.

¹⁴ National Law Center on Homelessness and Poverty, *Alone without a Home: A State-By-State Review of Laws Affecting Unaccompanied Youth*, September 2012. <http://www.nlchp.org/content/pubs/Alone%20Without%20a%20Home,%20FINAL1.pdf>.

¹⁵ FEMA, *A Whole Community Approach to Emergency Management: Principles, Themes, and Pathways for Action*, December 2011. <http://www.fema.gov/about/wholecommunity.shtm>.

the event of a large-scale disaster, specifically one occurring during normal business hours and/or the school day.

3. Establish an understanding of how all applicable parties (leading and supporting) can work together to support each other's missions, achieving the overall goal of expeditiously reunifying children displaced as a result of disaster with their parents or legal guardians.
4. Identify tools and resources that could assist localities and states in disaster-related reunification efforts, to include the use of technology and support from Federal agencies, NGOs, and other stakeholders.

The underlying goals of this document reflect the importance of making reunification a priority in any disaster-related event. Safety is of the utmost concern; children are often unable to defend themselves, and, in the chaos of a catastrophic event, can easily become the victims of maltreatment, abuse, kidnapping, and, in the most severe case, exploitation. This document seeks to heighten an awareness and support of the following key objectives relating to the reunification of unaccompanied minors with their parents or legal guardians:

- Swift and safe reunification of minors with parents or legal guardians.
- Safe and temporary care of unaccompanied minors to include accessible sheltering and/or housing.
- Supplies necessary to sustain infants and toddlers with and without disabilities and/or other access and functional needs (e.g., food, diapers, electrolytes, consumable medical supplies, and durable medical equipment).¹⁶
- Appropriate medical care of minors; additional support services such as personal assistance may be necessary to support children with disabilities and other access and functional needs.
- Appropriate mental and behavioral health care of minors, to be understood as the many interconnected psychological, emotional, cognitive, developmental, and social influences on behavior, mental health, and substance abuse, and the effect of these influences on the overall well-being of a child or adult. Behavioral factors directly and indirectly influence individual and community risks, health, resilience, and the success of public health strategies and directives.
- Sensitivity to the cultural differences and diverse populations of our Nation.
- Effective, efficient action through:
 - A shared understanding of local and national resources and capabilities.
 - Collaboration, coordination, effective communication for children with disabilities and other access and functional needs, and needs assessments during disasters.
 - Shared operational procedures and technologies.

¹⁶ For a complete list, see FEMA, *Commonly Used Sheltering Items and Service Listing Catalog*, August 2011. <https://nmcs.communityos.org/cms/files/os114/p384/Final%20CUI%20Catalog%20as%20of%20August%202011%20%28v2%29.pdf>.

- o An awareness of varying roles and responsibilities in multi-state disasters and/or host state events. For example, identifying the agency ultimately responsible for the temporary care of minors separated as the result of a disaster, such as law enforcement or social service agencies, and differing authorities and statutes.

Individual and community preparedness is fundamental to the success of reunification efforts. By providing equal access to acquire and use necessary knowledge and skills, this document is designed to enable the whole community to contribute to and benefit from national preparedness. This includes children; individuals with physical and cognitive disabilities and other access and functional needs; those from diverse religious, racial, and ethnic backgrounds; and people with limited English proficiency. Their contributions must be integrated into reunification efforts, and their needs must be incorporated into reunification planning and execution.

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Roles

When identifying roles associated with the reunification of unaccompanied minors, it is critical to have an understanding of those organizations within your local jurisdiction and/or respective state that are responsible for the temporary care of children separated from their parents or legal guardians as a result of a disaster, as roles often vary among jurisdictions and states.

Agencies and organizations responsible for the temporary care of unaccompanied minors and overseeing reunification efforts should have clearly identified roles and responsibilities, and may consider outlining processes and procedures addressing the safety of children, length of stay in shelters, transition to social services system, child custody requirements, medical consent requirements, and any other sheltering issues specific to this population identified in their emergency preparedness plans. Children with disabilities and other access and functional needs may require additional support services.

The following section briefly describes some of the government agencies and NGOs that lead and support reunification efforts before, during, and after a disaster. It is recommended that consideration be given to determining ways in which members of the whole community (e.g., governmental, nongovernmental, private, and nonprofit) can support overall reunification efforts.

Local Level

This section describes some of the potential reunification roles of local agencies. However, every jurisdiction will handle reunification in its own way.

1. Local Offices of Emergency Management and Emergency Operations Centers (EOCs)
 - a. Develop, maintain, coordinate, and execute all-hazards emergency preparedness plans that incorporate evacuation and reunification procedures and processes for children who have become separated from their parents or legal guardians as a result of disaster. Local and state governments may also incorporate evacuation tracking systems, which are used during mass evacuation procedures (see Annex B: Resource Directory). The execution of these reunification related plan elements may require additional coordination to meet the needs of children with disabilities and other access and functional needs, those who have chronic health or medical needs, are non-verbal, or have limited English proficiency. These needs may be met by coordinating with disability and/or pediatric organizations, law enforcement, social service agencies, medical facilities, schools, and other partners.
 - b. Comply with state laws that provide necessary guidance and procedures for missing persons to include children. Local plans should be coordinated with local and state law enforcement to ensure that EOC procedures do not conflict with established laws or reunification efforts (e.g., procedures, processes, roles).
 - c. Make adequate training available for first responders to facilitate the expeditious reunification of unaccompanied minors with parents or legal guardians.

- d. Include and coordinate with local schools and child care facilities (including home care facilities) when developing/enhancing local emergency management plans.¹⁷ It is recommended that evacuation and reunification procedures and processes be addressed in emergency preparedness plans and that plans be inclusive of all populations, to include children with and without disabilities and other access and functional needs. It is also suggested that these plans be shared with parents and legal guardians and reviewed and/or exercised regularly.
 - e. Survey existing capabilities among relevant agencies and the private sector to help facilitate emergency transport, including accessible transport, and the tracking (when and where applicable) and reunification of children with their parents or legal guardians.¹⁸
 - f. Coordinate with partners to determine whether essential age-appropriate shelter supplies for infants and children are incorporated into shelter planning, and identify the availability of child-specific infant/toddler supply caches readily available for immediate deployment to support shelter operations.¹⁹ Additional shelter supplies for children may include batteries for hearing aids and other necessary devices commonly used for communication access.
 - g. When conducting a mass evacuation and utilizing a tracking system, collect the appropriate data relevant to children with and without disabilities and other access and functional needs, and chronic health and medical needs, to better meet specific health care requirements and facilitate a more expeditious reunification should the child become separated from his or her parent or legal guardian.
 - h. Collaborate with nongovernmental, community, and faith-based organizations, as well as the private sector to promote individual and family disaster preparedness planning to include family reunification and continuity of operations planning.
 - i. Consider using pediatricians as liaisons to parents and families to disseminate emergency preparedness information encouraging the importance of preparing a disaster kit and family emergency plan, as well as guidance outlining how to reunite should family members be separated as a result of a disaster. Pediatricians have unique access to children and their parents or legal guardians, and are trusted on issues such as disasters, and can easily reach a large portion of a community's population.
2. Local Child Welfare Agencies (e.g., Department of Social Services, Department of Human Services, Department of Children and Family Services, Department of Public Health)
- a. Support the safety and needs of children separated from parents or legal guardians and parents or legal guardians seeking missing children during a disaster.

¹⁷ Save the Children, "NACCRRA and Save the Children Release Recommendations for Protecting Children in Child Care during Emergencies," February 2011.

<http://www.savethechildren.org/site/apps/nlnet/content2.aspx?c=8rKLIXMGIpI4E&b=6478615&ct=9139743>.

¹⁸ National Commission on Children and Disasters, *2010 Report to the President and Congress*, October 2010.

<http://www.acf.hhs.gov/ohsepr/nccdreport/index.html>.

¹⁹ FEMA, *Commonly Used Sheltering Items and Service Listing Catalog*, August 2011.

<https://nmcs.communityos.org/cms/files/os114/p384/Final%20CUI%20Catalog%20as%20of%20August%202011%20%28v2%29.pdf>.

- b. Coordinate with the appropriate agencies and organizations for the temporary care and shelter of unaccompanied children. Confirm that background checks have been conducted and fingerprints collected for all individuals with access to unaccompanied minors.
 - c. Coordinate with law enforcement and the judicial system to ascertain the legal responsibilities of various agencies to accomplish the following:
 - i. Provide temporary and, if necessary, long-term care of the minor.
 - ii. Implement standardized guidance to verify the identity and custody rights of adults seeking the release of the child.
 - iii. Safely release the child to a verified parent or legal guardian.
 - iv. Work within the judicial system to ensure that proper legal procedures are followed and keep the safety of the child in mind at all times.
 - d. Support human services roles and functions, including reunification, in disaster response and recovery operations in accordance with defined roles and emergency preparedness plans.
 - e. Provide guidance and assistance to child care centers with their emergency preparedness planning and reunification activities.
 - f. Provide guidance and assistance in developing emergency preparedness plans for foster parents and congregate facilities to address the likelihood that a no-notice or short-notice emergency or disaster could occur. Plans may address lockdown procedures, evacuations, sheltering-in-place, relocation, and reporting of foster children's safety and location to local social services, parents, and legal guardians.²⁰
 - g. In coordination with state child welfare agencies and the judicial system, address the potential need for temporary substitute care in a mass casualty event in which many children are left orphaned. States may consider several strategies to handle the potential surge in orphaned children requiring care:
 - i. Establish guidelines for rapid vetting of potential placement families.
 - ii. Identify placement families with the capacity to accept additional foster children.
 - iii. Identify existing youth placement programs (e.g., group foster care homes) that could rapidly accept orphaned children.
 - h. Facilitate the sharing of information across jurisdictional lines allowing children and families access to the services and support to which they are entitled.
3. Local Law Enforcement
- a. Work with local or state child welfare agencies to ensure children are safe and have temporary and supportive care.
 - b. Work with local child welfare agency to investigate the incident if a crime has potentially occurred.

²⁰ American Academy of Pediatrics, "Disaster Planning for Schools." *Pediatrics*, 2008.

- c. Complete appropriate paperwork required by local law enforcement agencies and/or local child welfare agencies.
 - d. Coordinate with state law enforcement and NCMEC on reunification issues.
 - e. Enter information on unaccompanied minors into the National Crime Information Center (NCIC) registry.
4. Local Education Systems
- a. Develop and maintain school emergency preparedness plans and processes that address lockdown procedures (to protect from imminent threats such as gunmen), shelter-in-place (to protect from the threat of contamination or weather events), evacuation, relocation, and reuniting students with their parents or legal guardians.
 - i. Details included may vary from school to school.
 - ii. Schools are strongly encouraged to establish relationships and consider sharing their emergency preparedness plans with first responders and/or local emergency managers in an effort to better coordinate overall reunification efforts in the event of a large-scale or catastrophic incident. It is also recommended that schools be included in local emergency planning drills.²¹
 - iii. School emergency preparedness plans are typically implemented to address the likelihood that a no-notice or short-notice event may strike while children are attending school.
 - iv. Depending on the situation, schools may deviate from plans and release children early or hold them later than planned to promote the safety of the students in their charge. In these instances, parents and legal guardians should be properly notified.
 - v. All plans should address the needs of children with disabilities and other access and functional needs.
 - vi. When developing emergency preparedness plans, community emergency management teams should include general and special education teachers, case managers or related personnel, local disability services and advocacy specialists and/or municipal Americans with Disabilities Act specialists.
 - vii. Plans should address the use of school facilities during non-school hours (e.g., afterschool programs, summer and recreational activities).
 - viii. Schools are the nexus of parent, child, and community life, and separated families or unaccompanied children may seek out schools for information, sheltering, or reunification during times of disaster.
 - b. Clearly communicate school emergency preparedness plans with parents, legal guardians, and caregivers and encourage them to develop a family plan identifying a local meeting

²¹ Chung S., Danielson J., Shannon M., "School-Based Emergency Preparedness: A National Analysis and Recommended Protocol." *Agency for Healthcare Research and Quality*, December 2008. <http://archive.ahrq.gov/prep/schoolprep/>.

point and an out-of-state relative or friend for each family member to contact in the event that all local communication lines are down.²²

5. Local Coroners/Medical Examiners

- a. Investigate fatalities that occur as a result of a disaster and provide assistance in the identification of deceased persons, including children.
- b. Direct the collection of antemortem data through extensive communication with families and other means. Data collection may include the following:
 - i. Physical description of the victim (e.g., approximate age, height, weight, gender, hair color);
 - ii. Description of clothing and jewelry;
 - iii. Description of unique characteristics (e.g., tattoos, scars, birthmarks);
 - iv. Dental records, medical records, implant or joint replacement serial numbers, and fingerprint records;
 - v. DNA reference samples from the family members.
- c. Establish death notification procedures in coordination with a team of mental health professionals and spiritual support providers.
- d. When a deceased child cannot be identified by name, enter information pertaining to the child (e.g., fingerprints, DNA, scars, marks, tattoos) into DOJ's National Missing and Unidentified Persons System (NamUs). NamUs is a national, centralized repository and resource center for missing persons and unidentified decedent records.

State Level

This section describes some of the potential reunification roles of state agencies. All state reunification actions are taken in support of local efforts. Although each state will have its own methods of handling reunification, this section provides some common examples.

1. State Offices of Emergency Management

- a. Develop, coordinate, and execute all-hazards emergency preparedness plans that incorporate evacuation and reunification procedures and processes for children who have become separated from their parents or legal guardians as a result of a disaster. The execution of these reunification-related plan elements may require additional coordination to meet the needs of children with disabilities and other access and functional needs, those who have chronic health or medical needs, are non-verbal, or have limited English proficiency. These needs may be met by coordinating with local emergency management and other agencies, disability and/or pediatric organizations, law enforcement, social service agencies, child welfare agencies, medical facilities, schools,

²² FEMA, "Make a Plan," Ready Web site. <http://www.ready.gov/make-a-plan>. Also see Annex C: Family Emergency Plan Template.

mass care shelters, and other partners with access to information regarding children separated from their families or caregivers.²³

- b. Look to state laws that provide necessary guidance and procedures for missing persons to include children. State plans should be coordinated with law enforcement to ensure that EOC procedures do not conflict with established laws or reunification efforts (e.g., procedures, roles, responsibilities).
- c. To improve the chances of success during an actual event, evacuation and reunification procedures should be practiced regularly through disaster preparedness exercises, which include agencies/organizations responsible for leading and supporting reunification efforts, facilities responsible for the temporary care of children (e.g., educational, child care, medical and recreational facilities, family care homes, summer programs and camps, before and after school programs), and parents or legal guardians. Exercises may also be used to identify lessons learned when addressing the needs of children with disabilities and others with access and functional needs.²⁴
- d. Conduct a review of existing capabilities among relevant agencies and the private sector to accommodate the need for emergency transport—including accessible transportation—and reunification of children and account for these in plans.
- e. Coordinate with agencies and partners responsible for integrating essential age-appropriate resources for infants and children into mass care/human services, supply, and equipment caches.²⁵
- f. If implemented by the state, use a mass evacuation tracking system to collect appropriate data for all children, particularly unaccompanied minors (see Annex B: Resource Directory). Inquire whether evacuation tracking systems include sufficient data fields to record descriptive details for children who are too young to know their name and address (e.g., approximate age; description of the child and his/her clothing; date, time, and site where the child was found).
- g. Promote family reunification planning as part of individual and family preparedness education and activities.
- h. In coordination with state Departments of Education and agencies that oversee child care and summer camp programs, support the development of emergency preparedness planning inclusive of children with disabilities and other access and functional needs to address lockdown procedures in schools and child care facilities, evacuation, sheltering-in-place, relocation, and reunification of children with their parents or legal guardians.
- i. As necessary, activate the state EOC to facilitate multi-agency coordination across Emergency Support Function (ESF) representatives, including a pre-designated

²³ U.S. DHS, *Fiscal Year 2012 Homeland Security Grant Program Supplemental Resource: Children in Disasters Guidance*. http://www.fema.gov/pdf/government/grant/2012/fy12_hsgp_children.pdf.

²⁴ National Commission on Children and Disasters, *2010 Report to the President and Congress*, October 2010. <http://www.acf.hhs.gov/ohsepr/nccdreport/index.html>.

²⁵ FEMA, *Commonly Used Sheltering Items and Service Listing Catalog*, August 2011. <https://nmcs.communityos.org/cms/files/os114/p384/Final%20CUI%20Catalog%20as%20of%20August%202011%20%28v2%29.pdf>.

reunification lead for child reunification, in accomplishing reunification processes in response to a disaster situation.²⁶

2. State Child Welfare Agencies (e.g., Department of Social Services, Department of Human Services, Department of Children and Family Services, Department of Public Health)
 - a. Support the safety and needs of children separated from parents or legal guardians and parents or legal guardians seeking missing children during a disaster.
 - b. Coordinate with the appropriate agencies and organizations for culturally and linguistically appropriate temporary care and shelter of unaccompanied children.
 - c. Coordinate with law enforcement and the judicial system to ascertain the legal responsibilities of various agencies to accomplish the following:
 - i. Provide temporary and, if necessary, long-term care of the minor.
 - ii. Verify the identity and custody rights of adults seeking the release of the child.
 - iii. Safely release the child to a verified parent or legal guardian.
 - d. Support human services roles and functions, including reunification, in disaster response and recovery operations in accordance with defined roles and emergency preparedness plans.
 - e. Develop consensus among agencies and organizations responsible for the management (e.g., processes, procedures, credentialing, training) of the needs of children and families, including those with disabilities and other access and functional needs.
 - f. Provide guidance and assistance to local child welfare agencies and child care centers with their emergency preparedness planning and reunification activities.²⁷
 - g. Plan for the potential need for emergency foster care in a mass casualty event in which many children are left orphaned.
 - h. Support the development of all-hazards emergency preparedness planning inclusive to children with disabilities and other access and functional needs to address lockdown procedures in daycares and summer camps, evacuation, sheltering-in-place, relocation, and reunification of children with their parents or legal guardians.
 - i. Reinforce the need for family contact information and authorization for emergency transportation and medical care before a disaster happens.

²⁶ See the NRF Resource Center Web site for additional information on ESFs: <http://www.fema.gov/emergency/nrf/>.

²⁷ An example of such guidance is the Louisiana Department of Children and Family Services' "Guidance on Reunification" for child care programs (http://www.dcfs.louisiana.gov/assets/docs/searchable/ChildDevEarlyLearning/ChildDevUpdates/2011/Emergency%20Rule/Guidance_on_Reunification.pdf), which is based on "Protecting Children in Child Care During Emergencies, Recommended State and National Regulatory and Accreditation Standards for Family Child Care Homes and Child Care Centers and Supporting Rationale" by the National Association of Child Care Resource and Referral Agencies and Save the Children (http://www.naccrra.org/sites/default/files/publications/naccrra_publications/2012/protectingchildreninchildcareemergencies.pdf).

3. State Law Enforcement

- a. Work with local or state child welfare agencies to ensure children are safe and have temporary care.
- b. Work with the local child welfare agency to investigate the incident if a crime has potentially occurred.
- c. Complete appropriate paperwork required by the local law enforcement agency and/or local child welfare agency.
- d. Check databases, fingerprints, and other resources to identify unaccompanied minors and persons seeking to reunite with them.
- e. Work with NCMEC personnel (Team Adam and/or Project ALERT) deployed to support state and/or local law enforcement efforts of reuniting displaced minors with parents/legal guardians.
- f. Assume responsibility for unaccompanied minors, as provided for by law.
- g. State law enforcement often houses the state clearinghouses, whose reunification roles are described in the following section.

4. State Clearinghouses²⁸

- a. Provide resources for missing children, their families, and the professionals who serve them. Provide first responders with adequate training to identify and reunite unaccompanied children with parents or legal guardians. State clearinghouses, most often found within the State Police, may likely have the legal responsibility for and play a key role in the reunification of missing children with their families. State clearinghouses work very closely with the NCMEC Clearinghouse when researching and investigating missing-child cases.
- b. The missing-child clearinghouses are diverse in their delivery of services because of state and territorial mandates and the variety of agencies in which they exist. The primary areas of focus for missing-child clearinghouses are networking, information dissemination, training development and delivery, data collection, and provision of technical assistance in cases of missing and sexually exploited children. In some states, they are the primary responsible agencies for unaccompanied minors and/or missing children during a Presidentially- or state-declared disaster.
- c. Maintain a liaison with NCMEC and the state clearinghouse to obtain resources and technical assistance. See Annex A: List of State Clearinghouses for additional information.
- d. Disseminate information on unaccompanied minors to all local shelter managers, shelter managers in other states, and other state clearinghouses. Where possible, coordinate with other state clearinghouses and other organizations before incidents arise to promote information sharing and dissemination.

²⁸ NCMEC, "Missing-Child Clearinghouse Program."
http://www.missingkids.com/missingkids/servlet/ServiceServlet?LanguageCountry=en_US&PageId=1421.

5. State Courts (Including Family Courts)

- a. Facilitate the entry of children into and out of the foster care system. Plans should include guidance addressing the expedited reunification of parents and legal guardians with children who have been placed in the child welfare system.
- b. Support the resolution of legal issues involving unaccompanied minors as they relate to reunification.

National Level

Reunification is a team effort involving many players from all levels of government. When requested, the Federal Government can provide resources to assist local and state governments in accomplishing this mission. This assistance can be coordinated in part through the emerging concept of Reunification Strike Teams. These teams aim to ensure that all of the involved agencies work together, rather than having a series of parallel and uncoordinated efforts.

1. Reunification Strike Teams

- a. Led by local and/or state representation. May also be led by Federal or NGO entities when designated by state or local agencies.
- b. Composed of individuals from local and/or state government, FEMA, HHS, NCMEC, the American Red Cross, and others as applicable.
- c. Deploy to disaster areas in the immediate aftermath of the disaster to support local and state governments. Work with local authorities to assess the scope of the reunification need, including the number of separated children, and determine the resources needed for this stage of the disaster.
- d. As the response matures, the strike teams return to the Joint Field Office and become part of the Reunification Task Force. This task force works with local and state officials to conduct reunification efforts.
- e. Communicate concise, accurate information consistent with the ground truth to Federal agency headquarters and identify one specific agency/organization responsible for reporting this information to internal/external stakeholders, the public, news media, and any others.

2. U.S. Department of Homeland Security

a. Federal Emergency Management Agency

FEMA's mission is to support the Nation's citizens and first responders to ensure that we work together as a Nation to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards.

i. Federal Voluntary Agency Liaisons (VALs)

- Federal VALs are employed by FEMA to work with members of voluntary and faith-based organizations and other stakeholders to help identify and coordinate the delivery of goods and services to meet the needs of disaster survivors. Federal VALs work closely with state and local VALs.

ii. Mass Care and Emergency Assistance

- At the request of the state, activates the National Emergency Family Registry and Locator System (NEFRLS) web link and call center. FEMA may also request that NCMEC activate the NECLC call center and deploy Project ALERT personnel to support the reunification of separated children and intake of information, and/or deploy Team Adam personnel to the field to provide technical assistance to local and/or state law enforcement in locating and reuniting displaced children with their legal guardians.
- When requested, works with law enforcement officials to facilitate the reunification of displaced disaster survivors with their families; inquiries specific to children are referred to NCMEC.
- Provides reports generated from NEFRLS to contribute to the national and common operating picture.
- Coordinates with national reunification partners, including NCMEC, HHS, and the American Red Cross to support a cohesive plan for the reunification of adults and children displaced in the aftermath of a Presidentially-declared disaster.

iii. Urban Search and Rescue

- Urban search and rescue involves the location, rescue (extrication), and initial medical stabilization of victims trapped in confined spaces. Structural collapse is most often the cause of victims being trapped, but victims may also be trapped in transportation accidents, mines, and collapsed trenches.

- b. U.S. Citizenship and Immigration Services: Coordinates procedures if parents, legal guardians, or relatives of an unaccompanied minor are not located and the minor seeks to stay in the United States.
- c. U.S. Customs and Border Protection: Streamlines the process for transporting goods across the border in support of an international disaster.
- d. U.S. Immigration and Customs Enforcement: Establishes protocols for foster care of undocumented immigrants.

3. U.S. Department of Education

- a. Coordinates with other Federal agencies to promote school-centered reunification as part of an all-hazards emergency management plan. If a disaster strikes during the school day, *generally* speaking, school districts and individual schools are responsible for students until they are reunited with their caregivers. In the event of a major disaster, first responders and emergency managers should identify and locate school staff (e.g., teachers, nurses, janitorial staff) to identify the party or parties within the respective school responsible for the safety and well-being of unaccompanied minors.
- b. Contingency plans may detail who is responsible for unsupervised students if teachers and administrators are incapacitated or are otherwise unable to provide support.

- c. Provides a host of extant and emerging school-centered reunification resources as part of a comprehensive, all-hazards emergency management plan to local and state educational agencies.²⁹
- 4. U.S. Department of Health and Human Services (ESF #6 [Mass Care, Emergency Assistance, Housing, and Human Services] and ESF #8 [Public Health and Medical Services])
 - a. Administration for Children and Families (ACF) (ESF #6)
 - i. The ACF is a Federal agency funding local and state organizations to provide Temporary Assistance for Needy Families, child support, child care, Head Start, child welfare, and other programs relating to children and families. Within ACF, the Office of Human Services Emergency Preparedness and Response (OHSEPR) provides leadership in human services preparedness, response, and recovery, promoting resilience of individuals, families, and communities prior to, during, and after nationally declared disasters and public health emergencies. ACF/OHSEPR, in partnership with the 10 ACF Regional Offices, supports operations and policy in the field of disaster human services, including efforts to meet the needs of children and youth.
 - ii. During a large-scale event requiring the reunification of unaccompanied minors with parents and legal guardians, ACF would work closely with FEMA's Individual Assistance Division's Mass Care and Emergency Assistance Branch through a mission assignment to better support local and state child welfare agencies.
 - iii. The ACF Office of Refugee Resettlement (ORR), Division of Unaccompanied Children's Services (DUCS) was created to provide care and placement for unaccompanied alien children (UAC), though not necessarily separated from parents or legal guardians as a result of a disaster.
 - ORR/DUCS makes and implements placement decisions in the best interests of the UAC to ensure placement in the least restrictive setting possible while in Federal custody.
 - The majority of UAC are cared for through a network of state-licensed, ORR-funded care providers that provide classroom education, mental and behavioral health services, medical services, case management, and socialization/recreation.
 - The majority of children are placed in the minimally restrictive setting of shelter care. ORR/DUCS funds programs to provide a continuum of care for children, including foster care, group homes, staff secure, secure, and residential treatment centers.
 - b. Assistant Secretary for Preparedness and Response
 - i. Lead agency for Federal ESF #8.
 - ii. National Disaster Medical System (NDMS) assets, upon request, provide Federal assistance in the form of medical, veterinary, and mortuary services. The NDMS also

²⁹ U.S. Department of Education, "Readiness and Emergency Management for Schools." <http://rems.ed.gov>.

coordinates patient movement and definitive care for individuals being transported away from a disaster site in order to receive medical care.

5. U.S. Department of Justice

- a. The Office of Juvenile Justice and Delinquency Prevention (OJJDP) provides national leadership, coordination, and resources to prevent and respond to juvenile delinquency and victimization. OJJDP supports states and communities in their efforts to develop and implement effective and coordinated prevention and intervention programs and to improve the juvenile justice system so that it protects public safety, holds offenders accountable, and provides treatment and rehabilitative services tailored to the needs of juveniles and their families.
- b. Currently, OJJDP is supporting this reunification initiative by coordinating with other offices, bureaus, and divisions within DOJ to discuss strategies for overcoming challenges that exist regarding the reunification of juveniles in the event of a disaster. Specifically, OJJDP is focusing its efforts on the reunification of juveniles held in secure confinement. It is anticipated that OJJDP's outreach efforts will yield opportunities for greater collaboration and enhanced processes for reunification.

6. U.S. Department of State

- a. May assist in the evacuation and reunification of unaccompanied minors who cross international boundaries following a disaster.
- b. Coordinates with embassies and foreign governments regarding unaccompanied minors who have been or need to be identified and reunified.
- c. Notifies the appropriate consulate for individuals from countries that require such notification.

Nongovernmental and Private Sector Organizations

Within the nonprofit sector, voluntary agencies are the cornerstone for the delivery of mass care services following disasters. When incidents displace or otherwise disrupt survivors' access to life-sustaining goods and services, government agencies and stakeholders from the nonprofit and private sector involved in the provision of human services activate to minimize pain and suffering caused by disasters. In addition to the provision of shelter (including for household pets and service animals), food, water, clothing, temporary respite care, and basic health, mental, and behavioral health support, NGOs and private sector organizations also assist with family reunification.³⁰

1. National Center for Missing and Exploited Children

- a. Serves as the Nation's resource center on the issues of missing and sexually exploited children. Provides information, training, technical assistance, and resources nationwide to law enforcement, parents, children (including child victims), and other professionals.

³⁰ Temporary respite care of children involves provision of a secure, supervised, and supportive play experience for children in a Disaster Recovery Center, assistance center, shelter, or other service delivery site. Parents, guardians, or caregivers should remain onsite and maintain responsibility for their child or children.

- b. Works in partnership with Federal, state, and local law enforcement agencies to assist in the reunification of displaced children with their parents or legal guardians.
- c. Deploys Team Adam (retired law enforcement officials) to the location of a declared disaster to gather information about displaced children and provide technical assistance and support.
- d. Activates the NECLC, a toll-free hotline, teletype service dedicated to receive reports of displaced children, at the request of a state that has been impacted by a disaster.
- e. Promotes the UMR, a nationwide data collection tool aimed at expediting the reunification of an unaccompanied minor with his/her legal guardian, following a disaster.
- f. Shares posters of displaced children with a network of nationwide partners and media outlets to assist in the reunification of those children with their families. Information shared with the public includes name, date of birth, date missing, last known location, and other identifying information such as height, hair color, and eye color.
- g. Works closely with state missing-child clearinghouses to help ensure a comprehensive approach to child protection.
- h. Provides missing-child clearinghouses with training, technical assistance, and vital information to assist in handling missing-child cases.

2. American Red Cross

- a. Attempts to reach out to the minor's parent or legal guardian (if the child is aware of contact information).
- b. If unsuccessful, contacts law enforcement and child welfare agencies and transfers the child to their care and supervision.
- c. Documents the minor's arrival, changes in circumstances, and other information using the American Red Cross Unaccompanied Minors Report Form.
- d. Makes every effort to designate two volunteers or paid staff members to supervise an unaccompanied minor until they are safely conveyed to the appropriate authorities.
- e. Refers an unaccompanied minor with urgent health needs to the appropriate medical facilities and documents the circumstances.

3. Save the Children³¹

- a. Provides temporary respite care for children in the shelter environment, including dedicated children's areas.
- b. Assists care providers, emergency planners, and communities in preparing to safeguard children during and after disasters.
- c. Delivers community and school-based programs to help children and their adult caregivers to recover emotionally after a disaster.

³¹ More information regarding Save the Children's support of disaster response may be found at http://www.savethechildren.org/site/c.8rKLIXMGIpI4E/b.7495333/k.761B/Domestic_Disaster_Support.htm.

4. Southern Baptist Disaster Relief (Southern Baptist Convention)
 - a. Provides temporary respite care for children affected by disasters.
 - b. Provides mobile units equipped with appropriate equipment and supplies to care for children.
 - c. Provides volunteers who are trained, background checked, and credentialed to care for children in a safe, secure area.
 - d. Provides a temporary resource for parents in need of a safe, secure environment for their children when the operation of established day care centers is interrupted due to disaster.
 - e. Establishes temporary child care in local facilities such as churches, shelters, multi-agency compassion centers, service centers, and/or other facilities where a safe, secure, and comfortable environment for children can be provided.
5. Children's Disaster Services (Church of the Brethren): Provides temporary respite care for children in the shelter environment.
6. Corporation for National and Community Service: Provides support to missing persons call centers.
7. Faith-based and community organizations (typically those smaller voluntary organizations unaffiliated with National Voluntary Organizations Active in Disaster)
 - a. Provide assistance in the development of family reunification plans.
 - b. Partner with local, state, and Federal agencies in the sheltering and feeding of disaster survivors.
 - c. Provide trained staff to assist in the care of minors.
8. Private sector partners
 - a. Encourage employees to develop family reunification plans as part of continuity of operations planning.³²
 - b. Support reunification efforts as part of the whole community concept.
 - c. Display bulletin boards with posters and identifying information of missing children.
 - d. May allow local, state, and Federal emergency managers and NGOs to use parking lots for reunification staging.
 - e. Display messages concerning missing children on electronic billboards along major roads and highways.
 - f. Social media and Web sites serve as powerful tools for individuals to communicate their post-disaster whereabouts and condition to friends and relatives. Individuals are encouraged to use social media, Web sites, text messaging, and other digital tools to communicate their whereabouts and condition with family, friends, relatives, and co-workers.

³² U.S. DHS, *Fiscal Year 2012 Homeland Security Grant Program Supplemental Resource: Children in Disasters Guidance*. http://www.fema.gov/pdf/government/grant/2012/fy12_hsgp_children.pdf.

- i. Google Person Finder is a web application available in over 40 languages that allows individuals to post and search for the status of relatives or friends affected by a disaster. It also allows press agencies, NGOs, and others to contribute to the database and receive updates. The Google Crisis Response team makes a determination to turn on Google Person Finder based on the scale of a disaster. Web sites can also choose to embed Google Person Finder as a gadget on their own pages.³³ (Note: FEMA does not endorse any nongovernmental Web sites, companies, or applications).
- ii. The American Red Cross operates a Digital Operations Center that uses social media to source additional information from affected areas during emergencies to better serve those who need help, spot trends, and better anticipate the public's needs, and connect people with the resources they need (e.g., food, water, shelter, mental and behavioral health support).
- g. Privately owned child care, recreational, and other facilities are strongly encouraged to have emergency preparedness plans specific to evacuation and reunification and communicate them to parents and legal guardians.
- h. Pediatricians have unique access to children and families and can serve as liaisons to communicate the importance of disaster preparedness, the need for a family plan and disaster kit, the importance of listening for public messaging during disasters, and what to do in the case that parents or legal guardians are separated from their children as a result of a disaster.

Tribes

Tribes are strongly encouraged to develop comprehensive emergency operations plans that include provisions for the reunification of children separated from their parents or legal guardians in the aftermath of a disaster. The Federal Government has a trust relationship with Federally-recognized tribes and recognizes their right to self-government. In addition, some states have a similar relationship with state-recognized tribes. Tribal governments, as sovereign nations, govern and manage the safety and security of their lands and citizens. To that end, tribal governments coordinate resources to address actual or potential incidents. When tribal response resources are inadequate, tribal leaders may seek assistance from local, private, state, and Federal partners.

For certain types of Federal assistance, tribal governments work with the state in which they are located. For other types of Federal assistance, as sovereign entities, tribal governments can elect to work directly with the Federal Government. Tribes are encouraged to build relationships with local, state, Federal and private sector partners as they may have additional resources available. The NRF's Tribal Coordination Support Annex³⁴ outlines processes and mechanisms that tribal governments may use to request direct Federal assistance during an incident regardless of whether there is a Stafford Act declaration. Tribes are also subject to the Indian Child Welfare Act (ICWA) (see the Authorities section for more information).

³³ Google, "Person Finder Help." <http://support.google.com/personfinder/?hl=en>.

³⁴ The NRF Resource Center Web site provides information on the Tribal Affairs Support Annex at <http://www.fema.gov/emergency/nrf/>.

Territories/Insular Areas

Territories and insular areas coordinate resources to address actual or potential incidents. Due to their remote geographic locations, territories and insular areas face unique challenges in quickly receiving assistance from outside the jurisdiction, and may often request assistance from other nearby countries or private resources. Assistance may also be available from the Federal Government through a request to the President through FEMA for a Stafford Act declaration, or through requests to the Department of the Interior or the Department of State for other types of assistance.³⁵

Tribal/Territorial/Insular Area Government Leader

The tribal/territorial/insular area government leader supports the public safety and welfare of the people of that territory, tribe, or insular area. As authorized by the territorial, tribal, or insular area government, the leader:

- Coordinates resources needed to respond to incidents of all types.
- May have powers to amend or suspend certain laws or ordinances associated with response.
- Communicates with the public in an accessible manner and helps people, businesses, and organizations cope with the consequences of any type of incident.
- Negotiates mutual aid and assistance agreements with other tribes, territories, insular areas, or state or local jurisdictions.

³⁵ See 48 U.S.C. Chapter 10 for more information. In addition, all transactions of territorial and local governments provided for in that chapter may be audited by the U.S. General Accountability Office per 48 U.S.C. 1469b.

Authorities

The following authorities govern various aspects of reunification, from authorities related to the rights of individuals with disabilities to emergency management authorities during times of disaster. This list is not intended to be comprehensive and various local and state statutes will also apply.

- Americans with Disabilities Act of 1990 as amended by the Americans with Disabilities Act Amendments Act of 2008, Public Law 110-325
- Code of Federal Regulations (CFR), Title 44, Chapter 1, FEMA, October 1, 2012
- Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99)

This Federal law protects the privacy of student education records and applies to all schools that receive funds under an applicable program of the U.S. Department of Education. Generally, schools must have written permission from the parent, legal guardian, or eligible student in order to release any information from a student's education record. However, FERPA allows schools to disclose those records without consent to comply with a judicial order or lawfully issued subpoena to appropriate officials in cases of health and safety emergencies, and to local and state authorities within a juvenile justice system pursuant to specific state law.

In some emergency situations, schools may only need to disclose properly designated "directory information" on students that provide general contact information. In other scenarios, school officials may believe that a health or safety emergency exists and more specific information on students should be disclosed to the appropriate parties. FERPA is not intended to be an obstacle in addressing emergencies and protecting the safety of students.³⁶

- Health Insurance Portability and Accountability Act (HIPAA) of 1996^{37, 38, 39}

The HIPAA privacy rule and Section 13402 of the Health Information Technology for Economic and Clinical Health Act, part of the American Recovery and Reinvestment Act of 2009, state the requirements for protected health information storage and what information may be released. In certain situations, limited disclosures of patient health information are allowed. "Providers and health plans covered by the HIPAA Privacy Rule can share patient information in all of the following ways:

³⁶ "U.S. Dept. of Ed Releases FERPA Guidance for Emergencies," *Campus Safety*, July 2010. <http://www.campussafetymagazine.com/Channel/School-Safety/News/2010/07/02/U-S-Dept-of-Ed-Releases-FERPA-Guidance.aspx>.

³⁷ U.S. HHS, "Can health care information be shared in a severe disaster?" March 2006. <http://www.hhs.gov/hipaafaq/permitted/emergency/960.html>.

³⁸ U.S. HHS, "Summary of the HIPAA Privacy Rule." <http://www.hhs.gov/ocr/privacy/hipaa/understanding/summary/index.html>.

³⁹ U.S. Department of Education, "Family Educational Rights and Privacy Act and the Disclosure of Student Information Related to Emergencies and Disasters," June 2010. <http://www2.ed.gov/policy/gen/guid/fpco/pdf/ferpa-disaster-guidance.pdf>.

- o Health care providers can share patient information as necessary to provide treatment. Treatment includes:
 - Sharing information with other providers (including hospitals and clinics).
 - Referring patients for treatment (including linking patients with available providers in areas where the patients have relocated).
 - Coordinating patient care with others (such as emergency relief workers or others that can help in finding patients appropriate health services).
- o Providers can also share patient information to the extent necessary to seek payment for these health care services.
- o Health care providers can share patient information as necessary to identify, locate, and notify family members, guardians, or anyone else responsible for the individual's care of the individual's location, general condition, or death. The health care provider should get verbal permission from individuals, when possible; but if the individual is incapacitated or not available, providers may share information for these purposes if, in their professional judgment, doing so is in the patient's best interest.
 - Thus, when necessary, the hospital may notify the police, the press, or the public at large to the extent necessary to help locate, identify, or otherwise notify family members and others as to the location and general condition of their loved ones.
 - In addition, when a health care provider is sharing information with disaster relief organizations that, like the American Red Cross, are authorized by law or by their charters to assist in disaster relief efforts, it is unnecessary to obtain a patient's permission to share the information if doing so would interfere with the organization's ability to respond to the emergency.
- o Providers can share patient information with anyone as necessary to prevent or lessen a serious and imminent threat to the health and safety of a person or the public – consistent with applicable law and the provider's standards of ethical conduct.
- o Health care facilities maintaining a directory of patients can tell people who call or ask about individuals whether the individual is at the facility, their location in the facility, and general condition.
- o The HIPAA Privacy Rule does not apply to disclosures if they are not made by entities covered by the Privacy Rule. Thus, for instance, the HIPAA Privacy Rule does not restrict the American Red Cross from sharing patient information.”⁴⁰
- Homeland Security Act of 2002, Public Law 107-296, as amended, 6 U.S.C. 101, et seq.
- Homeland Security Presidential Directive 5, *Management of Domestic Incidents*, February 28, 2003

⁴⁰ U.S. HHS, “Can health care information be shared in a severe disaster?” March 2006. <http://www.hhs.gov/hipaafaq/permitted/emergency/960.html>.

- Indian Child Welfare Act

ICWA was passed in 1978 to protect the best interests of Indian children and to promote the stability of Indian tribes and families. ICWA provides minimum Federal standards for the removal of Indian children from their families and placement of these children into foster care or adoptive homes that reflect Indian culture.

ICWA applies in all child custody proceedings involving foster care placements, termination of parental rights, and pre-adoptive and adoptive placements. ICWA does not apply in divorce proceedings involving custody disputes.⁴¹

- Individuals with Disabilities Education Act (IDEA)⁴²

The IDEA is a law ensuring services to children with disabilities throughout the Nation. IDEA governs how states and public agencies provide early intervention, special education, and related services to more than 6.5 million eligible infants, toddlers, children, and youth with disabilities.

Infants and toddlers with disabilities (birth–2) and their families receive early intervention services under IDEA Part C. Children and youth (ages 3–21) receive special education and related services under IDEA Part B.

- Interagency Coordinating Council on Emergency Preparedness and Individuals with Disabilities (ICC)

The ICC was established by Executive Order 13347 to ensure that the Federal Government appropriately supports safety and security for individuals with disabilities in disaster situations. The purpose of the council is to:

- o Consider, in their emergency preparedness planning, the unique needs of agency employees with disabilities and individuals with disabilities whom the agency serves.
- o Encourage, including through the provision of technical assistance, consideration of the unique needs of employees and individuals with disabilities served by state and local governments and private organizations and individuals in emergency preparedness planning.
- o Facilitate cooperation among Federal, state, and local governments and private organizations and individuals in the implementation of emergency preparedness plans as they relate to individuals with disabilities.⁴³

- Interstate Compact for the Placement of Children

This compact agreement was developed to “provide a process through which children, who are subject to this compact, are placed in safe and suitable homes in a timely manner.”⁴⁴

⁴¹ U.S. Department of Health and Human Services. *Indian Child Welfare Act*. <http://www.childwelfare.gov/systemwide/courts/icwa.cfm>

⁴² U.S. Department of Education, “Building the Legacy, IDEA 2004.” <http://idea.ed.gov>.

⁴³ U.S. Department of Homeland Security. *Interagency Coordinating Council on Emergency Preparedness and Individuals with Disabilities*. <http://www.dhs.gov/interagency-coordinating-council-emergency-preparedness-and-individuals-disabilities>.

The compact covers foster children being placed with a relative or another caregiver, children moving across state lines with foster parents, children placed for adoption by a public agency or private attorney, children placed in residential treatment facilities by parents, parents placing children with non-relatives, and pregnant women going across state lines to give birth.⁴⁵ It does not limit the receiving state's ability to take emergency jurisdiction for the protection of the child.

The compact also provides guidance for "uniform data collection and information sharing between member states."⁴⁶

Article V provides guidelines and processes for assessing whether or not the new placement would be a safe environment for the child. This compact does not apply to a situation where a child is leaving the United States to enter another country for the purpose of adoption.

- Pets Evacuation and Transportation Standards Act of 2006, Public Law 109-308⁴⁷

The Pets Evacuation and Transportation Standards (PETS) Act of 2006 was created to amend the Robert T. Stafford Disaster Relief and Emergency Assistance Act. The PETS Act ensures that state and local emergency preparedness plans address the needs of individuals with household pets and service animals prior to, during, and following a major disaster or emergency. Specifically, the act establishes that state and local plans address the rescue, care, shelter, and essential needs of individuals and their pets and service animals. The act also states that financial contributions can be made to state and local authorities for animal emergency preparedness purposes, including the procurement, construction, leasing, or renovating of emergency shelter facilities and materials that will accommodate people with pets and service animals.⁴⁸

- Post-Katrina Emergency Management Reform Act of 2006, Public Law 109-295

"The Post-Katrina Emergency Management Reform Act of 2006 stipulates major changes to the Federal Emergency Management Agency within the Department of Homeland Security to improve the agency's preparedness for and response to catastrophic disasters. For example, the act establishes a new mission for and new leadership positions within FEMA."⁴⁹

- Presidential Policy Directive 8, *National Preparedness*, March 30, 2011

⁴⁴ *Interstate Compact for the Placement of Children*. <http://www.aphsa.org/Home/Doc/Interstate-Compact-for-the-Placement-of-Children.pdf>.

⁴⁵ *Interstate Compact on the Placement of Children*, Adoption and Child Welfare Web site. http://www.adoptionchildwelfarelaw.org/faq_detail.php?id=89.

⁴⁶ *Interstate Compact for the Placement of Children*. <http://www.aphsa.org/Home/Doc/Interstate-Compact-for-the-Placement-of-Children.pdf>.

⁴⁷ U.S. Government Accountability Office, "Homeland Security: Preparing for and Responding to Disasters," March 2007. <http://www.govtrack.us/congress/bill.xpd?bill=h109-3858>.

⁴⁸ For more information regarding the eligible costs for the evacuation of persons and service animals after a Federally declared disaster, see FEMA Policy 9523.19: *Eligible Cost Related to Pet Evacuations and Sheltering*, and FEMA Policy 9523.15: *Eligible Costs Related to Evacuations and Sheltering*.

⁴⁹ U.S. Congress, "H.R. 3858 (109th): Pets Evacuation and Transportation Standards Act of 2006," October 2006. <http://www.gao.gov/products/GAO-07-395T>.

- Rehabilitation Act of 1973

Section 504⁵⁰ states that “no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under” any program or activity that either receives Federal financial assistance or is conducted by any Executive agency or the United States Postal Service.

Each Federal agency has its own set of section 504 regulations that apply to its own programs. Agencies that provide Federal financial assistance also have section 504 regulations covering entities that receive Federal aid. Requirements common to these regulations include reasonable accommodation for employees with disabilities; program accessibility; effective communication with people who have hearing or vision disabilities; and accessible new construction and alterations. Each agency is responsible for enforcing its own regulations. Section 504 may also be enforced through private lawsuits. It is not necessary to file a complaint with a Federal agency or to receive a “right-to-sue” letter before going to court.

Section 508 establishes requirements for electronic and information technology developed, maintained, procured, or used by the Federal Government. Section 508 requires Federal electronic and information technology to be accessible to people with disabilities, including employees and members of the public.

An accessible information technology system is one that can be operated in a variety of ways and does not rely on a single sense or ability of the user. For example, a system that provides output only in visual format may not be accessible to people with visual impairments, and a system that provides output only in audio format may not be accessible to people who are deaf or hard of hearing. Some individuals with disabilities may need accessibility-related software or peripheral devices in order to use systems that comply with Section 508.

- Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law No. 93-288, as amended, 42 U.S.C. 5121, et seq.
- Uniform Child Custody Jurisdiction and Enforcement Act⁵¹

This act, which has been adopted by 49 states, governs the process for handling child custody cases, including which entities have jurisdiction to determine custody.

⁵⁰ U.S. Department of Justice, *A Guide to Disability Rights Laws*. <http://www.ada.gov/cguide.htm>.

⁵¹ National Conference of Commissioners on Uniform State Laws, *Uniform Child Custody Jurisdiction and Enforcement Act*, 1997. <http://www.law.upenn.edu/bll/archives/ulc/uccjea/final1997act.pdf>.

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Planning Considerations

This section lists some of the planning considerations that may be taken into account when incorporating reunification concepts into emergency preparedness plans. This list is not intended to be all-encompassing and focuses on a few key areas.

- Promote the development of family disaster plans and/or child reunification cards that include pre-determined escape routes, methods to notify or contact family members, family meeting locations, pet accommodations, alternate transportation plans in the event that vehicles are non-operable, sufficient medical and personal supplies, and procedures for collecting children from school, child care, and post-disaster accommodations if the home is uninhabitable.⁵² Research shows that one-half of American families do not have a disaster preparedness plan.⁵³
- Child care and educational facilities are strongly encouraged to establish relationships, build and maintain emergency preparedness plans, and conduct drills and exercises with first responders and/or local emergency management officials, and to share emergency preparedness plans with parents and legal guardians to better link reunification efforts and improve resilience in the event of an emergency/disaster.⁵⁴
- Inquire whether health care facilities have emergency preparedness plans that specifically address the reunification of children with their parents or legal guardians and also address children's health care needs, to include children who need assistance with mobility and have medical, chronic health, or communication challenges. Reunification procedures should include pediatric patients as well as the children of employees who are required to work during the disaster.
- Inquire whether the emergency preparedness plans of health care facilities track the intake of newly injured and critically injured children into a medical facility, and whether the movement of pediatric patients is tracked when relocating to a new facility due to a no-notice event.
- Exceptions may be made to the privacy requirements contained within HIPAA to allow the sharing of information in certain emergency situations (see pages 23 and 24 of the Authorities section).
- Exceptions to FERPA privacy rules are also allowed under specific circumstances. FERPA allows schools to disclose those records without consent to comply with a judicial order or lawfully issued subpoena to appropriate officials in cases of health and

⁵² For a sample family disaster plan and child information card, see <http://www.ready.gov/make-a-plan>.

⁵³ Mailman School of Public Health, Columbia University, "Where the US Public Stands in 2011 on Terrorism, Security, and Disaster Preparedness." <http://www.ncdp.mailman.columbia.edu/files/2011maristsurvey.pdf>.

⁵⁴ See FEMA's independent study courses *IS-36: Multihazard Planning for Childcare* (<http://training.fema.gov/EMIWeb/IS/is36.asp>) and *IS-336: Planning for Children in Disasters* (<http://training.fema.gov/EMIWeb/IS/is366.asp>) for additional information.

safety emergencies, and to local and state authorities within a juvenile justice system pursuant to specific state laws.⁵⁵

- Inquire whether facilities responsible for the temporary care of children—especially child care, educational, and health care facilities—develop plans for the medical care of minors—particularly those who are non-verbal (infant/toddler) or have chronic health, medical, mobility, or communication challenges—during a disaster when a parent, legal guardian, or other responsible party is absent. Some states have medical consent laws that remove the need for parental consent in emergency situations. For non-emergency or ongoing care, court permission may be sought. Facilities may choose to request that parents sign waivers in advance of an incident. The following sample language may be of assistance:

“In the event of an emergency situation requiring medical treatment, I, [parent’s name], hereby grant permission for any and all medical and/or dental attention to be administered to my child/children, in the event of an accidental injury or illness, until such time as I can be contacted. This permission includes, but is not limited to, the administration of first aid, the use of an ambulance, and the administration of anesthesia and/or surgery, under the recommendation of qualified medical personnel.”⁵⁶

- To the extent possible, educate families on emergency preparedness and reunification prior to the occurrence of a disaster through public information and case workers in the field.
- As noted in the FEMA report *Crisis Response and Disaster Resilience 2030: Forging Strategic Action in an Age of Uncertainty*, NGOs, social media, and other members of the whole community play an increasingly critical role in messaging and reunification during disasters.⁵⁷

⁵⁵ “U.S. Dept. of Ed Releases FERPA Guidance for Emergencies,” *Campus Safety*, July 2010. <http://www.campusafety.com/Channel/School-Safety/News/2010/07/02/U-S-Dept-of-Ed-Releases-FERPA-Guidance.aspx>.

⁵⁶ Jennifer Wolf, “Printable Medical Release Form For Children,” <http://singleparents.about.com/od/healthinsurance/ss/medrelease.htm>.

⁵⁷ FEMA, *Crisis Response and Disaster Resilience 2030: Forging Strategic Action in an Age of Uncertainty*, January 2012. <http://www.fema.gov/library/viewRecord.do?id=4995>.

Concept of Operations Guidance

This section describes the concept of operations for the reunification of unaccompanied minors with their parents or legal guardians, including processes, procedures, lines of communication, and how various leading and supporting agencies and organizations may work together to facilitate the reunification of unaccompanied minors. It addresses integrating and coordinating factors across levels of government and between various agencies and discusses how reunification planning efforts could engage the whole community.

The manner in which support is provided to a population requiring the reunification of unaccompanied minors may vary based upon applicable local, state, and Federal laws, as well as the specific circumstances of each disaster incident or event. As such, this section is intended to provide a general suggestion for reunification processes and procedures. The processes and procedures set out in this document are suggestions only, and do not establish binding requirements. In addition, actual reunification processes and procedures will need to be adjusted based upon specific circumstances and requirements of the event.

This document addresses three potential reunification situations that may occur during a disaster:

1. A minor is separated from his or her parent or legal guardian.
2. The parent or legal guardian of a child reports the child missing.
3. A minor reported missing is found to be deceased.

Minor Separated from Parent or Legal Guardian

If a child is discovered as having been separated from his or her parents, legal guardians, or other relatives and is not being cared for by an adult who is legally responsible for doing so, that child is considered to be an unaccompanied minor. Upon discovery of an unaccompanied minor, agencies responsible for the temporary care of displaced minors may begin to work through the following steps to support the child while he or she is separated from his or her parent or legal guardian and to reunite the child with his or her parent or legal guardian.



Figure 1: Minor Separated from Parent or Legal Guardian

1. Identify the minor and gather information.
 - a. Determine whether the minor can *accurately* self-identify and provide information; there is a chance that the child may be a runaway and/or exploited and unwilling to identify himself or herself correctly.
 - b. Gather all information possible on the minor (e.g., name, age, pre-disaster address, names of parents/legal guardians, last known whereabouts of parents/legal guardians, relatives' contact information, and, when possible, any disabilities, access and functional needs, or medical needs). If available, each child should be issued a wristband with a unique identifying number.
 - c. If the child is unable to provide information, then proceed with processes and procedures identified within the jurisdiction or state for identification (e.g., checking fingerprints).
 - d. The UMR <http://umr.missingkids.com> is hosted by NCMEC and can be used by local and state emergency managers and other reunification stakeholders to assist with reunification efforts, planning, and strategies.
2. Alert a responsible agency/organization and, when applicable, other applicable parties (e.g., law enforcement, school district and/or individual schools, child welfare/child protective services authorities).
 - a. Use existing interagency coordination mechanisms to the extent possible and consider reaching out for Federal support.
 - b. Confirm that sufficient numbers of personnel (with background checks/fingerprints) are assigned to provide assistance and facilitate the safety, identification, and reunification of unaccompanied minors in an expeditious manner. Additional support services may be necessary (e.g., American Sign Language interpreters).
 - c. Coordination between ESFs may take place within the appropriate EOC.
3. Arrange for secure sheltering and care.
 - a. Provide assessment and treatment of medical, mental, and behavioral health needs at shelters and other service delivery sites. ESF #8 assets perform this function when requested or required.
 - b. State or local government entities may choose to open a dedicated unaccompanied minor shelter or support local jurisdictions in their sheltering efforts.
 - c. Place sleeping and recreational areas for unaccompanied minors in separated and access-controlled areas. Children with autism, intellectual and developmental disabilities, and others for whom noise and other elements are disruptive may also need quiet areas. If a structural area is unavailable, create an area with as much access control as possible (e.g., curtain draping, air walls, other barriers) and ensure that security personnel are located within this vicinity. Pre-designate staff to work in these areas.
 - d. Provide essential age-appropriate resources such as supplies necessary to sustain infants and toddlers, including those with disabilities and other access and functional needs (e.g., food, diapers, electrolytes, consumable medical supplies, and durable medical equipment).

- e. Implement security procedures in emergency sheltering and congregate facilities.
 - i. Place security personnel supporting unaccompanied minors continuously at entrances to and inside all areas (e.g., shelter sleeping area, play area, reception sites) and ensure that unaccompanied minors are escorted to restrooms by authorized, credentialed personnel. Safety should be of the utmost concern.
 - ii. Provide persons authorized for entry into these areas with noticeable and marked identification (e.g., area-specific badge, identifier such as a colored strip on shelter staff badge).
 - iii. Check and approve all identifications prior to allowing access to this population.
 - iv. Implement sign-in and sign-out procedures for parents, legal guardians, and caregivers as appropriate.
 - v. Ensure that background checks have been conducted and fingerprints collected for all individuals with access to unaccompanied minors.
 - vi. Confirm that all personnel are properly trained on the duties and limitations of their position as they relate to unaccompanied minors.
 - vii. Call out investigative resources as needed to assist if a crime has been committed.
- f. Activate personal assistance providers.
 - i. Personal assistance providers may be needed to support children who have been separated as a result of disaster and have a disability or other access and functional need.
 - Services may include basic personal care, such as grooming, eating, bathing, toileting, dressing and undressing, walking, transferring, and maintaining health and safety.
 - Higher levels of care may include changing dressings on wounds (e.g., pressure point sores), administering medications/injections (e.g., insulin), catheterization, and respiratory care.
 - ii. Consider incorporating shelter-in-place procedures into emergency preparedness plans. Such plans should address supplies necessary to sustain infants and toddlers, including those with disabilities and other access and functional needs, as well as those with medical, mental and behavioral, and chronic health needs.
 - iii. Confirm visual notification systems are available, as well as American Sign Language interpreters and captioning providers.
- 4. Assess legal authorities, requirements, and a timeline for child welfare/child protective services.
 - a. A legal authority is designated to act in place of the child's unavailable parent or legal guardian. This may be the court system, a state or local agency, designated institution or children's organization, or foster family provided through the state or locally.
 - b. Designated credentialed personal assistance providers may provide oversight of unaccompanied minors at shelters under the direction of the designated child welfare agency and/or law enforcement personnel as appropriate.

- c. The social services agency, developmental disabilities agency, or law enforcement personnel may take custody of a child for a limited period of time, especially in cases where children require specialized care and standard foster care may not be appropriate.
 - d. The timeline for transferring unaccompanied minors to foster care or specialized care, when applicable, differs depending on specific state criteria and the particulars of the disaster and could range from immediate transfer to foster care to transfer after a period of 3–5 days or only as a last resort following an extended period of time. Waivers to extend existing requirements may be put in place based on specifics of the incident and as authorized in accordance with state laws.
 - e. To expedite the process of returning children placed into foster care to their parents, courts may choose to issue an order stating that children may be immediately released from foster care and back to their parents or legal guardians once they are located and identification is confirmed.
5. Implement a process for tracking a child’s location (e.g., radio frequency identification [RFID] system, identification bracelet, badge, bar-coded system, UMR) until reunification occurs and they are no longer within the sheltering system.
- a. Tracking systems in use by local, state, Federal Government, or others should be coordinated for compatibility to share gathered data and to share data with the UMR.
 - b. Systems should be interoperable, to the extent possible, to avoid the dissemination of duplicative or inaccurate information and to streamline communications.
6. Coordinate with the NCMEC’s NECLC and/or enter information about the unaccompanied minor(s) into the NCMEC’s UMR.
- a. If possible, take a photo of the unaccompanied minor and provide it to NCMEC’s UMR along with other identifying information such as location description for further assistance.
 - b. Attempt to match the child with known missing children through NCMEC. If needed, NCMEC can develop a poster with the child’s image.
 - c. Consult with the NCMEC’s NECLC to determine whether the child has been entered into the UMR.
 - d. NCMEC will provide missing-child clearinghouses with training, technical assistance, and vital information to assist in handling missing-child cases. NCMEC will work closely with state clearinghouses and local and/or state law enforcement to provide technical assistance and assist in retrieving and processing vital information to assist in reuniting displaced children with their parents or legal guardians.
7. Conduct a local search for the parent or legal guardian in the immediate area.
- a. Coordinate a search within the sheltering operation to determine if the parent or legal guardian is currently being or has been housed in a local shelter different from that housing the child.
 - b. Coordinate with Family Assistance Centers; hospitals; child care, educational, and recreational facilities; and coroner/medical examiner’s offices to determine if the parent or legal guardian has been identified and/or located.

- c. Child welfare agencies, health departments, NCMEC, local and state law enforcement, coroner/medical examiner's office, and the Family Assistance Center may coordinate the sharing of information to facilitate the reunification of unaccompanied minors with their parents or legal guardians.
- 8. Conduct an expanded search for the parent or legal guardian over a larger geographic area.
 - a. Where applicable, state disaster tracking and identification systems that support mass evacuations with RFID and/or bar-coded identification bracelets or badges.
 - b. State agency systems, such as social service databases and law enforcement missing person's procedures.
 - c. Consult with the NCMEC's UMR.
 - d. In emergency situations, the American Red Cross, through their Safe and Well program, will work with law enforcement or child services agencies to support the best interests of the child.
 - e. DOJ NamUs, a searchable database to assist in solving cases that involve unidentified human remains.
 - f. The Federal Bureau of Investigation NCIC, which assists criminal justice professionals in locating missing persons.
 - g. U.S. National Library of Medicine's Reunite iPhone app, which can be used to report a missing or found person.
 - h. Communications with other states.⁵⁸
 - i. The ability to share information across multiple states may be limited under current laws. Coordinate among state legal systems and work with NCMEC's NECLC.
 - ii. State clearinghouses may allow for the sharing and transfer of information across state lines (see Annex A: List of State Clearinghouses).
 - i. Hospital or medical records.
 - i. May provide information identifying the location of children or parents/legal guardians.
 - ii. Hospital or medical facility emergency plans may address how the facility will handle information releases for unaccompanied minors in accordance with HIPAA privacy regulations (see the Authorities section).
 - j. Other reunification systems (see Annex B: Resource Directory for additional systems and system descriptions).
- 9. Verify the identity of a located parent or legal guardian before releasing the child to them. If identification is not readily available or if a pre-disaster custodial parent or legal guardian cannot be located or is deceased, additional steps may be required. The safety and best

⁵⁸ U.S. Congress, "Section 689b. Reunification," *Post-Katrina Emergency Management Reform Act*, October 2006. <http://www.gpo.gov/fdsys/pkg/plaw-109publ295/pdf/plaw-109publ295.pdf>.

interests of the child should always be kept in mind, and a child should not be released until records can be verified.

- a. Resources for verifying the identity of children and parents/legal guardians:
 - i. Interviews with the child if the child can and will communicate.
 - ii. School records and personnel.
 - iii. Court documents and records: birth records, custody (physical and legal) agreements, child support records, legal guardianship documents, wills, and other legal records establishing custodianship or legal guardianship.
 - iv. Social services records.
 - v. Fingerprinting and DNA testing. Consider establishing pre-incident voluntary registries and/or databases to better match fingerprints and DNA in the event of a major disaster.
 - vi. Interviews with family members or others acquainted with the child conducted by a designated authority with the sole purpose of establishing family links and identifying custodial or potential custodial relationships.
 - vii. The U.S. Department of State and/or authorities from the country of origin to help verify the identity of foreign individuals.
 - viii. Registration documents from the state containing identifying information about the child and his/her parents or legal guardians completed pre-incident at schools or child care facilities.
- b. Once the identity of the child and the parent or legal guardian has been ascertained, the next step is to determine whether they have the right to legal custody of the child before the child is released to them. Investigation and determination of custody and release of unaccompanied minors to parents or legal guardians should be a collaborative effort between child welfare agencies, law enforcement, and the judicial system.
 - i. If a parent or legal guardian is verified as having pre-disaster legal custody of an identified child (i.e., sole or joint), the child should be released to that person.
 - ii. If a parent, legal guardian, or person designated as a legal guardian by the parent (e.g., through a will) is not located, release of a child to another relative or legal guardian may be necessary and should be processed through standard judicial system protocols and processes.
 - iii. If a legal reason is found during verification of identity as to why a child cannot be returned to a parent or legal guardian (e.g., parent is taken into custody due to an outstanding warrant), standard law enforcement and social service protocols should be implemented.
 - iv. If there are any issues regarding the situation of the verified parent or legal guardian (e.g., homeless, disaster-related, or mental and behavioral health issues), these concerns should be passed onto existing social services, law enforcement, or applicable agencies for follow-up within regular legal or recovery operational structures. Disasters often increase stress levels and can compromise a child's well-

- being; consideration should be given as to whether the parent/legal guardian has the sufficient means to care for the child. This is also relevant to children with disabilities, children with special health care needs, youth involved in juvenile justice systems, and to families otherwise in distress due to domestic violence or the presence of other risk factors within or external to the family unit.⁵⁹
- v. If a child has been placed into temporary foster care, social services should coordinate to release the child to the identified parent or legal guardian. If the child is in foster care in a host state, the home state should coordinate with the host state regarding differing laws and authorities of that state for the return and reunification of the child.
- c. Disputes among adults seeking custody of a child may occur.
 - i. If independent adults (e.g., divorced, separated, individual legal guardians) with verified joint legal custody of the child each seek custody, the child should be released to the person verified to have the right to primary physical custody. If this cannot be determined, it should be resolved through standard judicial system protocols and processes.
 - ii. If a parent is identified, but custody of the child is documented to be solely with a different parent or legal guardian, release of the child to that person should not occur. If this is disputed, the parent may follow up using standard judicial system protocols and processes.
 - iii. Disputes among family members over physical custody of a child should be resolved through standard judicial system protocols and processes in accordance with pre-existing child custody laws.
10. Provide interim housing for unaccompanied minors while they await reunification.
- a. During the short term, minors may be placed into temporary substitute or foster care as they await reunification.
 - b. During the reunification process, permanent care arrangements such as adoption, long-term foster care, or the institutionalization of children with disabilities should be avoided. If reunification is not possible within an appropriate time frame, other solutions may need to be considered.
 - c. The unaccompanied minor should be kept informed, in an age appropriate manner, of plans being made for him/her, and his/her opinions should be taken into consideration.
 - d. The privacy, safety, and physical, mental, and behavioral health needs of the child should be taken into account when determining sheltering and housing options.
 - e. Every effort should be taken to promote siblings being kept together as they await reunification.
 - f. Housing options should be accessible to children with disabilities and other access and functional needs.

⁵⁹ U.S. Department of Justice, Office of Justice Programs, Office of Juvenile Justice and Delinquency Prevention. October 2011. *Emergency Planning for Juvenile Justice Facilities*. <https://www.ncjrs.gov/pdffiles1/ojjdp/234936.pdf>.

11. Arrange transportation for the physical reunification of minors with parents or legal guardians.
 - a. Once appropriate identification has been made to reunite unaccompanied minors with parents/legal guardians, arrange transportation modes to carry parents/legal guardians to unaccompanied minors or minors to parents/legal guardians.
 - b. Determine the mode of transport to be used (e.g., law enforcement or other government vehicle; ground, air, or rail transport; private or public mode; accessible transportation).
 - c. Coordinate with transportation providers, local and state governments, law enforcement, public child welfare agencies, sheltering organizations, international agencies (e.g., U.S. Department of State, foreign embassies, U.S. Customs and Border Protection), and other services to coordinate timing and movement plans.
 - d. Consider all local, state, national, and international laws and requirements for transporting minors across borders, including the Interstate Compact on the Placement of Children (see the Authorities section for additional information).⁶⁰
 - e. Implement appropriate plans including but not limited to:
 - i. Moving the adult to the minor rather than moving the minor.
 - ii. Using law enforcement, social services, or other authorized personnel to accompany the minor.
 - iii. Implementing reunification transportation procedures used by NCMEC.
 - iv. Following airline practices and procedures for the transport of unaccompanied minors.
 - v. Considering the inclusion of counselors or other mental and behavioral health providers when reuniting children with their parents and/or legal guardian.
 - f. In cases involving runaway children and/or where parents or legal guardians are responsible for the separation, local agencies or NGOs may consider implementing a monitoring mechanism for three to six months to confirm that the child is safe and is provided with an appropriate environment for growth and development.
12. Secure care for the child if the parent or legal guardian is not located, is deceased or incapacitated, or if the child was without care prior to the incident. The following options may be considered:
 - a. Identification and reunification with available and suitable alternative relative legal guardians should be explored and, if possible, implemented. All relatives should be positively identified and pass a background check.
 - b. Placement into the child welfare system (i.e., foster care).
 - c. Involvement of the court system within the appropriate legal jurisdiction and/or state.

⁶⁰ *Interstate Compact for the Placement of Children*. <http://www.aphsa.org/Home/Doc/Interstate-Compact-for-the-Placement-of-Children.pdf>.

- d. Institutionalization of children with disabilities in local and state facilities should be avoided at all costs, and nontraditional solutions may need to be considered.

Child Reported Missing by Parent or Legal Guardian

Upon report of a missing minor, agencies may begin to work through the following steps to locate and reunite the child with his or her family. As many of the steps described in this section are similar to those described above, only the differences are highlighted. Keep in mind that some undocumented parents or legal guardians may be concerned that reporting a missing child to authorities may result in deportation.

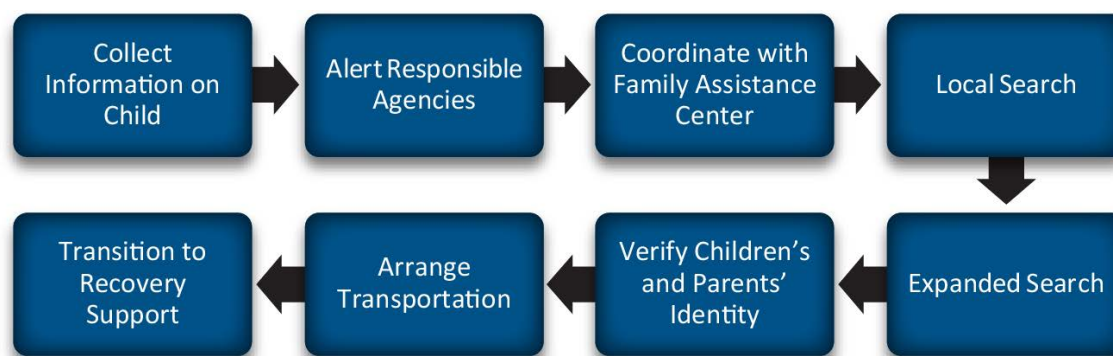


Figure 2: Child Reported Missing by Parent or Legal Guardian

1. Collect information on the missing child.
 - a. Conduct an interview with the family to gather information (e.g., name; nickname; pre-disaster address; landmarks near home; last known whereabouts of the child; events leading to missing child; profile of the child; identifying marks such as scars; and any disabilities, medical needs, and access and functional needs).
 - b. Request photos of the child, if available. If parents do not have access to photos of their children in the aftermath of a disaster, other sources of information—such as schools, child care, pediatricians, government agencies, private sector partners, or pre-disaster registries—should be explored.
2. Alert applicable agencies (e.g., law enforcement, school district and/or individual schools, NCMEC/NECLC, child welfare/child protective services authorities) through the ESF representatives or Reunification Strike Team in the appropriate EOC, if activated, or through other established alerting mechanisms.
3. Coordinate with a Family Assistance Center, if applicable.
4. Conduct an immediate local search for the child.
 - a. Determine whether the child is currently being or has been housed in another local shelter apart from his or her family. If he or she can be located using this method, arrange for reunification.
 - b. Coordinate with Family Assistance Centers, hospitals, or coroner/medical examiner's offices to determine if the child has been identified and/or located.
 - c. Use social media and other technology to engage community involvement.

5. Conduct an expanded search for the child over a larger geographic area.
 - a. See the *Conduct an expanded search for the family or legal guardian* in the previous section for more information.
6. Verify the identity of the child and parent or legal guardian.
 - a. See the *Verify the identity of located parents or legal guardians* in the previous section for more information.
7. Arrange appropriate transportation for physical reunification.
 - a. See the *Arrange transportation for physical reunification* in the previous section for more information.
8. Transition to recovery support at the appropriate time.
 - a. Arrange for the continued support of the family using ongoing missing-child systems.

Unaccompanied Minor Identified as Deceased

1. If a child is found to be deceased in the aftermath of a disaster, scientific or positive identification should be made by a coroner or medical examiner prior to the notification of next of kin or before the body is released to a person authorized to direct the disposition of remains. Protocols should be in place to address the processes and procedures for notifying authorities, agencies, and families.
2. In cases involving the death of a child, every effort should be made to include grief counselors and mental health support services for the primary caregivers and siblings of the deceased. The notification team may additionally include a representative of the medical examiner or coroner, a member of the clergy, and possibly a medical professional. If the family's pastor or other clergy member is present, the team clergy should play only a supportive role. Law enforcement may also assist.
3. If the family cannot be located, the responsible agency should follow its standard procedures for notifying the next of kin of deceased individuals.
4. A Family Assistance Center may also be used to help match deceased individuals with their relatives.
5. HHS Disaster Mortuary Operational Response Teams may provide additional assistance with victim identification.

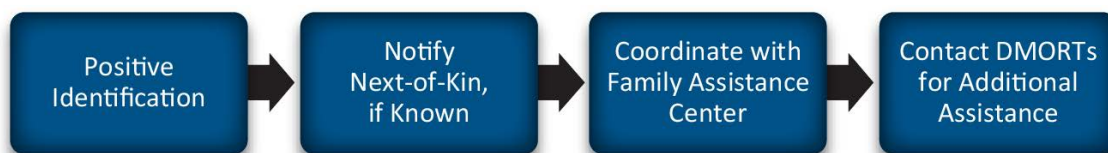


Figure 3: Unaccompanied Minor Identified as Deceased

Supplemental Checklist

This supplemental checklist contains planning considerations to guide the integration of reunification of children separated from their parents or legal guardians following a disaster into existent emergency operations plans. This checklist is meant to be used concurrently with the planning process defined in Comprehensive Preparedness Guidance 101 Version 2.0 to determine which components may be lacking in a jurisdiction's current planning efforts and those that are already included in their plan or supporting procedures (standard operating procedures or standard operating guidelines).

Preparedness

- Have you included in the planning group individuals and stakeholders with expertise in pediatric and disabilities issues, as well as relevant community leaders, service providers, and other subject matter experts?
- Have you provided demographic data and information on the number of children and where they tend to be during normal business hours or the school day (e.g., educational, child care, medical, juvenile justice, recreational, and other facilities)?
- Have you identified the agency with the lead role for coordinating evacuation and reunification planning efforts and ensuring children with and without disabilities and other access and functional needs are incorporated into all emergency preparedness plans?
- Have you identified support agencies to assist the lead agency in coordinating evacuation and reunification planning efforts and ensuring that children are incorporated into all emergency preparedness plans?
- If feasible, have you identified a Child Coordinator (e.g. State Emergency Medical Services for Children Coordinator) to provide expertise for the emergency planning process and to support the Incident Commander, the Planning Section, and/or the Operations Section during an emergency?
- Have you included mechanisms or processes to effectively identify children and families who will need additional assistance with specific mobility, access and functional, communications, or health-related needs in advance of, during, and following an emergency?
- Have you addressed procedures to secure medical records to enable children with disabilities and/or other special health care needs to receive health care and sustained rehabilitation in advance of, during, and following an emergency, or to assist with reunification efforts?
- Have you outlined roles and responsibilities for supporting children with and without disabilities and other access and functional needs, and children with special health care needs?
- Have you identified governmental and nongovernmental resources to meet critical needs such as reunification, accessible sheltering, housing, educational and child care needs, rental assistance, and emergency repairs for families of children with special health care needs?

- Have you identified training and exercise opportunities for first responders, emergency managers, and pediatric stakeholders to learn how to fully incorporate children and children with disabilities and other special health care needs into emergency preparedness plans and operations?
- Have you defined procedures for the training and use of spontaneous volunteers with background checks and fingerprints who may offer their services to families with children and children requiring additional support?

Evacuation Support

- Have you ensured that children with and without disabilities and other access and functional needs are incorporated into all evacuation considerations and planning?
- Have you included affirmative recognition of the need to keep children with disabilities and their caregivers, mobility devices, other durable medical equipment, and/or service animals together during mass evacuations?
- Have you outlined procedures to provide the availability of sufficient and timely accessible transportation to evacuate children with disabilities and other access and functional needs whose families do not have their own transportation resources?
- Have you collaborated with educational, child care, medical and juvenile justice facilities, and others responsible for the temporary care of children, specifically those with disabilities and other access and functional needs, to ensure that their emergency preparedness plans address reunification of children with their parents or legal guardians?
- Have you identified the means by which incoming transportation requests will be tracked, recorded, and monitored as they are fulfilled?
- Have you identified a process for tracking a child's location should they become separated from parents or legal guardians during a public mass evacuation (e.g., RFID system, identification bracelet or badge, bar-coded system) until reunification occurs?

Shelter Operations

- Have you outlined procedures for ensuring there will be adequate and accessible shelters capable of sheltering unaccompanied minors in the event of a large scale event occurring during normal business hours and resulting in mass quantities of children separated from their parents or legal guardians?
- Have you confirmed that adequate shelter space allocation is provided for children with disabilities and other access and functional needs who may need additional space for assistive devices (e.g., wheelchairs and walkers) and/or other life sustaining equipment such as oxygen?
- Have you addressed necessary developmentally appropriate supplies (e.g., diapers, formula, baby food, age appropriate items), staff, medicines, durable medical equipment, and supplies that would be needed during an emergency for children with disabilities and other special health care needs?
- Have you identified personnel who can provide assistance to unaccompanied minors at shelters, to include personal care providers and security personnel?

Reunification Mechanisms

- Have you identified a communication mechanism or pre-designated a primary point of contact to coordinate with shelters, Family Assistance Centers, hospitals, childcare and educational facilities, and coroner/medical examiner's offices in the immediate area to begin searches for unidentified minors and their families?
- Have you coordinated with child welfare agencies, health departments, the NCMEC's NECLC, and law enforcement to request assistance with reunification efforts?
- Have you established communications or pre-designated a primary point of contact to coordinate with state and national agencies and organizations and/or Reunification Strike Teams to enlist their assistance with reunification efforts?
- Have you explored state and national reunification systems such as the NECLC's UMR or American Red Cross Safe and Well Web site to determine whether they can assist with your reunification efforts?
- Have you established a process for verifying the identity of located parents or legal guardians before unaccompanied minors will be released to them?
- Have you identified accessible and credentialed transportation resources (including Para-transit service vehicles, school buses, municipal surface transit vehicles, drivers, and/or trained attendants) that can provide needed services during physical reunification?

Public Information and Outreach

- Have you identified ways to promote personal preparedness among children, their families, and temporary caregivers (including educational, child care, medical, juvenile justice and recreational personnel)?
- Have you identified mechanisms for disseminating timely and accessible emergency public information using multiple methods (e.g., television, radio, Internet, sirens) to reach families of children with sensory and cognitive disabilities, as well as families with limited English proficiency?
- Have you engaged NGOs, social media, and other members of the whole community, who play an increasingly critical role in messaging and reunification during disasters?

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Conclusion

The approach proposed in this document regarding the reunification of children with their families or legal guardians following a disaster is the first attempt at defining how this process works on a nationwide scale. It acknowledges that separation may occur during the evacuation, rescue, or sheltering processes and that assistance with reunification may be required. It encompasses coordination across the whole community, and serves as a resource for agencies and organizations at all levels of government, children's facilities, and other external stakeholders and aims to assist in the enhancement of existent emergency preparedness plans or development plans specific to evacuation and reunification processes and procedures. The planning assumptions, roles, concepts of operations, relevant authorities, and other resources included in this document may help to facilitate the coordination and integration of efforts across the whole community in reunifying unaccompanied minors with their parents, legal guardians, and families in the aftermath of a disaster.

Local and state jurisdictions are encouraged to use this document to inform reunification planning, customizing the assumptions and processes outlined here as appropriate for their situations and needs. They should take into account the roles, processes, likely support actions, and available resources of other jurisdictions, levels of government, and NGOs, including the private sector, as described in this document. The combined efforts of all applicable parties can help to ensure that the essential task of reuniting families in the aftermath of a disaster is accomplished efficiently. This document should also be shared with educational, child care, medical, juvenile justice, recreational and other applicable facilities to support the enhancement and/or development of emergency preparedness planning.

Although this document is focused solely on the reunification of children separated from their parents or legal guardians following a disaster, post-disaster reunification is a concern for people of all ages and demographics. Future planning efforts will be devoted to addressing this need, as well as expanding to include the overall population, to include service animals and household pets. All future efforts will be developed with the approach contained within this document in mind, encouraging all members of the response team to work together to achieve the ultimate goal of reuniting all members of the community with their loved ones following a disaster.

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Annex A: List of State Clearinghouses

Each state and territory provides resources for missing children, their families, and the professionals who serve them. These resources are referred to as missing-child clearinghouses. The National Center for Missing and Exploited Children (NCMEC) maintains a liaison with each missing-child clearinghouse and helps to ensure that they are familiar with the many resources available. The NCMEC provides missing-child clearinghouses with training, technical assistance, and vital information to better assist them in handling missing-child cases. The state clearinghouse should be involved in any reunification planning at the state level. A list of agencies representing each state can be found in the following table.⁶¹

While the clearinghouse managers are involved in all reunification planning, the clearinghouses are not necessarily the primary lead organizations for reuniting children separated from their parents or legal guardians as a result of disaster. Throughout the development of this document, several states provided information on the agencies with the overall responsibility for unaccompanied minors in the state. These agencies are listed in the “Lead Agency” column.

State/Territory Name	State/Territory Clearinghouse	Lead Agency
Alabama	Alabama Bureau of Investigation/Missing Children P.O. Box 1511 Montgomery, AL 36102-1511 (800) 228-7688 Fax: (334) 353-2563 http://www.dps.state.al.us/abi	
Alaska	Alaska State Troopers Missing Persons Clearinghouse 3925 Tudor Centre Road Anchorage, AK 99508 (907) 269-5058/(800) 478-9333 (in-state only) Fax: (907) 269-0732	
American Samoa		
Arizona	Arizona Department of Public Safety Criminal Investigations Research Unit P.O. Box 6638 Phoenix, AZ 85005 (602) 644-5868 Fax: (602) 644-8709	Arizona Department of Economic Security; Division of Children, Youth, and Families
Arkansas	Office of Attorney General Missing Children Services Program 323 Center Street, Ste. 200 Little Rock, AR 72201 (501) 682-1020/(800) 448-3014 (in-state only) Fax: (501) 682-6704 http://www.ag.state.ar.us	

⁶¹ NCMEC, “Missing-Child Clearinghouse Program.” <http://www.missingkids.com/Clearinghouses>.

State/Territory Name	State/Territory Clearinghouse	Lead Agency
California	California Department of Justice Missing/Unidentified Persons Unit P. O. Box 903387 Sacramento, CA 94203-3870 (916) 227-3290/(800) 222-3463 Fax: (916) 227-3270 http://ag.ca.gov/missing	
Colorado	Colorado Bureau of Investigation Missing Person/Children Unit 710 Kipling Street, Suite 200 Denver, CO 80215 (303) 239-4251 Fax: (303) 239-5788	
Connecticut	Connecticut State Police Missing Persons P.O. Box 2794 Middletown, CT 06457-9294 (860) 685-8190/(800) 367-5678 (in-state only) Emergency Messaging: (860) 685-8190 Fax: (860) 685-8346	Department of Emergency Services and Public Protection
Delaware	Delaware State Police State Bureau of Identification 1407 N. DuPont Hwy. Dover, DE 19903 (302) 739-5883 Fax: (302) 739-5888	
District of Columbia	D.C. Metropolitan Police Dept. Missing Persons/Youth Division 1700 Rhode Island Avenue, N.E. Washington, DC 20018 (202) 576-6768 Fax: (202) 576-6561	
Florida	Florida Department of Law Enforcement Missing Children Information Clearinghouse P.O. Box 1489 Tallahassee, FL 32302 (850) 410-8585/(888) 356-4774 (nationwide) Fax: (850) 410-8599 http://www.fdle.state.fl.us	Florida Department of Law Enforcement
Georgia	Georgia Bureau of Investigation Georgia Information Sharing and Analysis Center P.O. Box 29649 Atlanta, GA 30359 (404) 486-6420/(800) 282-6564 (nationwide) Fax: (404) 486-6446	
Guam		

State/Territory Name	State/Territory Clearinghouse	Lead Agency
Hawaii	Missing Child Center—Hawaii Department of the Attorney General 235 S. Beretania Street, Suite 401 425 Queen Street Honolulu, HI 96813 (808) 586-1449 Hotline: (808) 753-9797 Fax: (808) 586-1097 http://www.missingchildcenterhawaii.com	
Idaho	Idaho Bureau of Criminal Identification Missing Persons Clearinghouse P.O. Box 700 Meridian, ID 83680-0700 (208) 884-7154/(888) 777-3922 (nationwide) Fax: (208) 884-7193 http://www.isp.state.id.us	
Illinois	Illinois State Police Clearinghouse for Missing Persons 2200 S. Dirksen Parkway, Suite 238 Springfield, IL 62703-4528 (217) 785-4341/1-800-843-5763 (nationwide) FAX 217-557-0565	
Indiana	Indiana State Police Indiana Missing Children Clearinghouse 100 North Senate Avenue Third Floor Indianapolis, IN 46204-2259 (317) 232-8310/(800) 831-8953 (nationwide) Fax: (317) 233-3057 http://www.state.in.us/isp	
Iowa	Missing Person Information Clearinghouse Division of Criminal Investigation 215 E. 7th Street Des Moines, IA 50319 (515) 725-6036/(800) 346-5507 (nationwide) Fax: (515) 725-6035 http://www.iowaonline.state.ia.us/mpic/	
Kansas	Kansas Bureau of Investigation Missing/Unidentified Person Clearinghouse 1620 S.W. Tyler Street Topeka, KS 66604 (785) 296-8200 Fax: (785) 296-6781 http://www.accesskansas.org/kbi/	
Kentucky	Kentucky Intelligence and Information Fusion Center 200 Mero Street, Suite 127 Frankfort, KY 40601 (502) 564-1020/(800) KIDS-SAF (543-7723, nationwide) Fax: (502) 564-5315	

State/Territory Name	State/Territory Clearinghouse	Lead Agency
Louisiana	Louisiana State Police Louisiana Clearinghouse for Missing and Exploited Children 7919 Independence Blvd. A-2 Baton Rouge, LA 70806 (800) 434-8007 Fax: (225) 925-4766 http://lsp.org/cid.html	
Maine	Maine State Police—Missing Children Clearinghouse CID 1 1 Game Farm Road Gray, ME 04039 (207) 657-5710 Fax: (207) 657-5748	
Maryland	Maryland Center for Missing Children Maryland State Police 1201 Reisterstown Road Baltimore, MD 21208 (410) 290-1620/(800) 637-5437 (nationwide) Fax: (410) 290-1831	
Massachusetts	Massachusetts State Police Commonwealth Fusion Center 124 Acton Street Maynard, MA 01754 (978) 451-3700 Fax: (978) 451-3707	
Michigan	Michigan State Police Michigan Intelligence Operations Center Michigan State Police 714 South Harrison Road East Lansing, MI 48823 (517) 241-7183 Fax: (517) 241-6815	
Minnesota	Minnesota State Clearinghouse MN Bureau of Criminal Apprehension 1430 Maryland Avenue E. St. Paul, MN 55106 (651) 793-7000 (24/7) Fax: (651) 793-7015	
Mississippi	Mississippi Highway Patrol Criminal Information Center 3891 Highway 468 West Pearl, MS 39208 (601) 933-2656 Fax: (601) 933-2677	
Missouri	Missouri State Highway Patrol Missing Persons Unit P. O. Box 568 Jefferson City, MO 65102 (573) 526-6178/(800) 877-3452 (nationwide) Fax: (573) 526-5577	

State/Territory Name	State/Territory Clearinghouse	Lead Agency
Montana	Montana Department of Justice Missing/Unidentified Persons P.O. Box 201402 303 N. Roberts Street, Room 471 Helena, MT 59620-1402 (406) 444-2800 Fax: (406) 444-4453	
Nebraska	Nebraska State Patrol CID/Missing Persons Clearinghouse P. O. Box 94907 Lincoln, NE 68509-4907 (402) 479-4986/1-877-441-5678 (toll free) Fax: (402) 479-4054	
Nevada	Nevada State Advocate for Missing and Exploited Children Office of the Attorney General 555 E. Washington Ave., Suite 3900 Las Vegas, NV 89101-6208 (702) 486-3539/(800) 992-0900 (in-state only) Fax: (702) 486-2377	County child welfare agencies and Nevada Department of Health and Human Services, Division of Child and Family Services
New Hampshire	New Hampshire State Police Investigative Services Bureau Major Crime Unit 91 Airport Rd Concord, NH 03301 (603) 271-2663/(800) 852-3411 (in-state only) 24-hour referral number (603) 271-3636 Fax: (603) 271-2520	N.H. Dept. of Health and Human Services, Division of Children, Youth and Families 800-853-3345 800-894-5533 603-271-6562 (in state only) 129 Pleasant St. Concord, NH 03301
New Jersey	New Jersey State Police Missing Persons Unit P. O. Box 7068 W. Trenton, NJ 08628 (609) 882-2000/(800) 709-7090 (nationwide) Fax: (609) 882-2719 http://www.njsp.org/divorg/invest/mpce-unit.html	New Jersey Department of Children and Families
New Mexico	New Mexico Department of Public Safety ATTN: Law Enforcement Records P. O. Box 1628 Santa Fe, NM 87504-1628 (800) 457-3463 Fax: (505) 827-3399	

State/Territory Name	State/Territory Clearinghouse	Lead Agency
New York	New York Division of Criminal Justice Services Missing Persons Clearinghouse 4 Tower Place Albany, NY 12203 (800) 346-3543 (nationwide) Fax: (518) 457-6965 http://criminaljustice.state.ny.us	
North Carolina	North Carolina Center for Missing Persons 4706 Mail Service Center Raleigh, NC 27699-4706 (800) 522-5437 (nationwide) Fax: (919) 715-1682	
North Dakota	North Dakota Clearinghouse for Missing Children North Dakota Bureau of Criminal Investigation 4205 N. State Street Bismarck, ND 58503 (701) 328-8171 Fax: (701) 328-5510	Department of Human Services
Northern Mariana Islands		Department of Community and Cultural Affairs
Ohio	Missing Persons Unit Ohio Attorney General's Office Criminal Justice Initiatives 150 Gay Street, 25th Floor Columbus, OH 43215-4231 (614) 466-5610/(800) 325-5604 (nationwide) http://www.mcc.ag.state.oh.us/	
Oklahoma	Missing Person Clearinghouse Oklahoma State Bureau of Investigation Criminal Intelligence Office 6600 N. Harvey Oklahoma City, OK 73116 (405) 879-2645/(800) 522-8017 Fax: (405) 879-2967	
Oregon	Oregon State Police Missing Children Clearinghouse 255 Capital Street, NE, 4th Floor Salem, OR 97310 (503) 934-0188/(800) 282-7155 (in-state only) Fax: (503) 363-5475 http://www.osp.state.or.us	
Pennsylvania	Pennsylvania State Police Missing Persons Unit Bureau of Criminal Investigation 1800 Elmerton Avenue Harrisburg, PA 17110 (717) 346-3378 Fax: (717) 705-2306	

State/Territory Name	State/Territory Clearinghouse	Lead Agency
Puerto Rico	Missing Children Program Centro Estatal Para Niños Desparecidos y Victimas de Abuso P.O. Box 9023899 Old San Juan, Puerto Rico 00902-3899 (787) 729-2068/2457/(800) 995-NINO (limited calling area) Fax: (787) 722-0809	
Rhode Island	Rhode Island State Police Missing and Exploited Children Unit 311 Danielson Pike North Scituate, RI 02857 (401) 444-1125 Fax: (401) 444-1149	
South Carolina	South Carolina Law Enforcement Division Missing Person Information Center P. O. Box 21398 Columbia, SC 29221-1398 (803) 737-9000/(800) 322-4453 (nationwide) Fax: (803) 896-7595	South Carolina Department of Social Services, Office of Constituent Service and Public Information, Disaster Response Services
South Dakota	South Dakota Attorney General's Office Division of Criminal Investigation 1302 East Highway 14, Suite 5 Pierre, SD 57501-8505 (605) 773-3331 Fax: (605) 773-4629	
Tennessee	Tennessee Bureau of Investigation Criminal Intelligence Unit 901 R.S. Gass Blvd. Nashville, TN 37206 (615) 744-4000 Fax: (615) 744-4655	
Texas	Texas Department of Public Safety Criminal Intelligence Service Missing Persons Clearinghouse P.O. Box 4087 Austin, TX 78773-0422 (512) 424-5074/(800) 346-3243 (in-state only) Fax: (512) 424-2885 http://www.txdps.state.tx.us/mpch	
United States Virgin Islands	U.S. Virgin Islands Police Department Patrick Sweeney Police Headquarters RR02 Kingshill St. Croix, VI 00850 (340) 772-2211 Fax: (340) 772-2626	

State/Territory Name	State/Territory Clearinghouse	Lead Agency
Utah	Utah Department of Public Safety Bureau of Criminal Identification Utah Missing Persons Clearinghouse 3888 West 5400 South P.O. Box 148280 Salt Lake City, UT 84114-8280 (801) 965-4686/(888) 770-6477 (nationwide) Fax: (801) 965-4749	
Vermont	Vermont State Police 103 South Main Street Waterbury, VT 05671 (802) 244-8727 Fax: (802) 241-5552	
Virginia	Virginia State Police Department Missing Children's Clearinghouse P. O. Box 27472 Richmond, VA 23261 (804) 674-2026/(800) 822-4453 (800 VACHILD) Fax: (804) 674-2105	
Washington	Washington State Patrol Missing Persons Unit P. O. Box 2347 Olympia, WA 98507-2347 (800) 543-5678 (nationwide) Fax: (360) 704-2971	
West Virginia	West Virginia State Police Missing Children Clearinghouse 725 Jefferson Road South Charleston, WV 25309-1698 (304) 558-1467/(800) 352-0927 (nationwide) Fax: (304) 558-1470	
Wisconsin	Wisconsin Missing and Exploited Children Wisconsin AMBER Alert Coordinator P. O. Box 7857 Madison, WI 53701-2718 (608) 266-1671/(800) THE-HOPE (in-state only) Fax: (608) 267-2777	
Wyoming	Wyoming Office of the Attorney General Division of Criminal Investigation 316 West 22nd Street Cheyenne, WY 82002 (307) 777-7537 Control Terminal: (307) 777-7545 Fax: (307) 777-8900	

Annex B: Resource Directory

This annex identifies existing state and national systems that function as part of the reunification resource network. Local and state jurisdictions should consider using this directory as a guideline when developing their own plans for disaster recovery centers, sheltering, and other types of reception and servicing centers, integrating any applicable resources listed here, as well as any others regularly used by the jurisdiction to assist with reunification. These directories should include the agencies and entities capable of providing assistance with each system.

1. National Center for Missing and Exploited Children (NCMEC) National Emergency Child Locator Center (NECLC)

The NECLC's overall mandate is to establish procedures to facilitate the expeditious identification and reunification of displaced children with their parents or legal guardians. Primary responsibilities of the NECLC include:

- a. Establishing a toll-free hotline and teletype and video relay service lines to receive reports of displaced children.
- b. Creating a 508-compliant Web site to provide information about displaced children.
- c. Deploying personnel to the location of a Presidentially declared disaster event to gather information about displaced children.
- d. Providing information to the public about additional resources.
- e. Partnering with Federal, state, and local law enforcement agencies.
- f. Referring reports of displaced **adults** to the Attorney General's designated authority and the National Emergency Family Registry and Locator System (NEFRS).⁶²

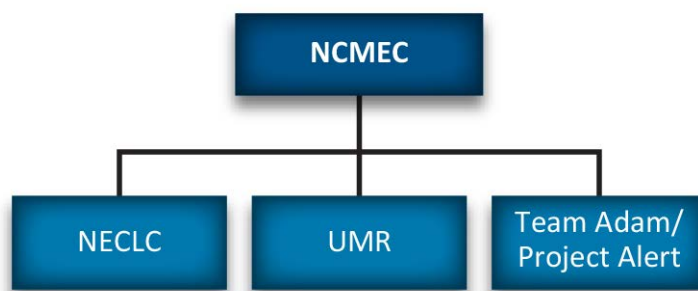


Figure 4: NCMEC Resources

2. Unaccompanied Minors Registry

The Unaccompanied Minors Registry (UMR) supports the ability to collect, store, report, and act on information related to children missing or lost as a result of a disaster. This tool is administered by NCMEC and used by NECLC to gather and share information with and provide technical assistance to local law enforcement and assist in the reunification of

⁶² NCMEC, "Congress Creates National Emergency Child Locator Center within National Center for Missing and Exploited Children," October 2006. <http://www.missingkids.com/DisasterResponse>.

displaced children with their parents or legal guardians.⁶³ Additionally, data within the tool can, through proper channels, be used by local and state emergency managers, as well as other reunification stakeholders to assist with reunification efforts, planning, and strategies.

The UMR serves as a centralized and protected database where information pertaining to unaccompanied minors can be stored. It uses a Web-based portal to allow for one-way communication between external tracking and reunification tools and the NECLC, and will remain active during all disasters (i.e., not restricted to Presidentially declared disasters).

3. American Red Cross Safe and Well Web site

The American Red Cross Safe and Well Web site provides families with a tool to exchange welfare information with loved ones and friends in the immediate aftermath of a disaster. The site allows a disaster survivor to select and post standard messages for friends and family that indicate the survivor is safe and well and will make contact when he or she is able. Those worried about the safety of a survivor can access the site, enter either the name and telephone number or name and complete address of the person in question, and view his/her “safe and well” messages.

The American Red Cross will establish agreements with phone/communications vendors to set up a bank of computers, including teletype lines, for public use post-event. The home page for these computers will be set to the Safe and Well Web site. Safe and Well will also be set as the home page on computers at congregate centers and shelters in host and evacuation areas.

The privacy of the survivor is maintained by not disclosing his/her specific location. In addition, names of minors in American Red Cross shelters are not posted to Safe and Well without the consent of a parent or legal guardian. However, the American Red Cross will provide information to law enforcement or child welfare agencies in emergency situations if it is in the best interests of the child.

Safe and Well is accessible to the public from the American Red Cross Web site:
<http://www.redcross.org/safeandwell>.

4. U.S. Department of Health and Human Services (HHS) Joint Patient Assessment and Tracking System (JPATS)

JPATS is the Federal system used to track patients that are moved by the Federal Government at the request of another agency, state, or local authority. This Web-based application tracks patient movement through their continuum of care, noting the time of each movement and the location of the individual at all times. JPATS allows its users to see enough personal information about the patients so they can be properly identified. It also captures the patient’s health status to assist in transport and to allow receiving facilities to know what is coming their way. All information is protected by the Privacy Act. This tool is provided by HHS at no cost to the states.

⁶³ Team Adam and Project ALERT—comprising retired law-enforcement professionals with years of investigative experience at the Federal, state, and local levels—will provide rapid, onsite assistance to law enforcement agencies and families in reuniting unaccompanied minors with their parents or legal guardians.

5. National Emergency Family Registry and Locator System (NEFRLS)

Established in the aftermath of Hurricanes Katrina and Rita, NEFRLS is a nationally-accessible, Web-based system that facilitates the reunification of families separated or displaced by a disaster. It allows adults who have been displaced from their homes or pre-incident locations to voluntarily register and share specific information on their post-disaster well-being or location with designated family members. Family members and friends may search the database for a record created by a displaced individual.

NEFRLS is activated when requested by a state following a Presidentially-declared disaster or mass evacuation event and operates on a 24/7 basis. It is accessible via a toll-free telephone number or the Internet.⁶⁴

6. National Mass Evacuation Tracking System (NMETS)

NMETS, developed by the Federal Emergency Management Agency, is composed of both manual and computer-based systems that are designed to assist states in tracking the movement of transportation-assisted evacuees, their household pets, luggage, medical equipment, and other personal items during evacuations.

NMETS includes three distinct evacuation support tools that can operate independently or be used in combination to support multi-state, state-managed, or local-level evacuation operations:

- Paper Based Evacuation Support Tool.
- Low Tech.
- Advanced Technology.

Major Functionality (Advanced Technology): During enrollment, radio frequency identification (RFID)/barcode wristbands are given to evacuees and their possessions. The wristband numbers are used to link all household members and their possessions electronically in the system. The wristbands, which contain a unique identifying number that is associated to an evacuee's information, are scanned at each site to record the evacuee's location and departure/arrival times. This information may be used to create transportation manifests, determine sheltering requirements, and inform operational decision making regarding the allocation of emergency resources. The following are examples of information collected:

- Evacuee name.
- Date of birth.
- Pre-evacuation address.
- Medical needs.
- Service animals.
- Household pets.

⁶⁴ Benefits.Gov, "The National Emergency Family Registry and Locator System."
<http://www.benefits.gov/benefits/benefit-details/4635>.

- Luggage.
- Medical supplies/equipment.
- Additional family members.

7. Local and State Tracking Systems

Some local and state jurisdictions have incorporated tracking systems into their disaster evacuation plans. These systems are designed to register and track persons who use government-provided transportation to evacuate from and return to an area that has been or is anticipated to be impacted by a disaster.

The purpose of these systems is fourfold, and includes the following:

- a. Support the reunification of separated families using information gathered at evacuation.
- b. Identify persons with medical needs, disabilities, and other access and functional needs who may require additional assistance.
- c. Associate government-assisted evacuees with their family members, personal items (e.g., luggage), durable medical equipment, and household pets.
- d. Support Federal reimbursement documentation requirements for states that provide government-assisted evacuation.

Several examples of local and state tracking systems are included below. Any system that may be used across state or jurisdictional lines should be coordinated with that host area for compatibility.

a. Phoenix Tracking System

Louisiana's Phoenix tracking system uses coded arm bands to track people during disaster evacuations. People arriving at public pickup points and evacuation centers are given armbands and their information is input into an Internet-connected computer system. As evacuees are loaded onto buses or other accessible transportation and evacuated, their locations are tracked and updated as they are relocated and moved. The system also tracks pets and durable medical equipment that evacuees bring with them. Phoenix can be used to support reunification by allowing the state to search for information on individuals and heads of household and link them with family members.

b. Radiant Radio Frequency Identification

The Texas Department of Public Safety has an agreement with Radiant RFID (also known as Evacuation Tracking Network) to use their system to track evacuees during a disaster. Evacuees meet at locations known as embarkation centers. Upon arrival, each adult and child is issued a wristband, and pets have tags attached to their collars. Both the pet and child bands are linked to their legal guardians in the database. Buses are equipped with global positioning system locators to track the whereabouts of the vehicles and the individuals inside them. As the evacuees disembark the buses, their needs are assessed

and a final location destination is determined. Each individual's information is retrieved using a handheld scanner used to scan the wristbands of each individual.⁶⁵

c. **Unidentified Victim Identification System**

New York City's Unidentified Victim Identification System (UVIS) is a comprehensive disaster management system that manages and coordinates all of the activities related to missing persons reporting and victim identification. In concert with New York City's 3-1-1 Call Center, the City of New York Office of Chief Medical Examiner, the New York Police Department, and other agencies throughout the city, UVIS enables a centralized communications and data collection system to support these processes. This coordinated system is essential to developing an accurate manifest of potential victims following a disaster—a critical first step in victim identification.

8. Reunite

Reunite is an application for the iPhone and iPod Touch that assists aid workers and relief workers working in family reunification after disasters. It can also be used by the general public to report a missing or found person. This application can be downloaded from the Web site <http://www.nlm.nih.gov/mobile/index.html>.

Reunite was developed by the U.S. National Library of Medicine (NLM) at the National Institutes of Health. Information gathered through this app is downloaded onto the People Locator interactive notification wall provided by the NLM at <http://pl.nlm.nih.gov>.⁶⁶

9. Reconnect Families Database

The National Resource Center's Reconnect Families Database is a Web-based system designed to assist local jurisdictions with the reunification of foster children who have been displaced and/or separated from their families in the wake of hurricanes or other disasters. Reconnect Families allows child welfare agencies to track the whereabouts and well-being of foster children and identify those who have not yet been reunited. The system tracks children, adult family members, placement providers, and agency workers.

Agencies can also use the application in preparation for a disaster by preloading extra contact information on individuals to be used in contacting them if they are dispersed. Additional information can be found at <http://www.nrccwdt.org/2011/10/reconnect-families-database>.

10. Lost Person Finder

The Lost Person Finder enables family, friends, and neighbors to locate missing people during a disaster event. The NLM initially created this Web-based people finder software for finding people who were in hospitals after a disaster. After the Haiti earthquake, it was modified to allow public access. It was created by the Communications Engineering Branch of the NLM.

⁶⁵ "RFID-based System Tracked Victims of Hurricanes Gustav, Ike," *RFID Journal*.
<http://www.rfidjournal.com/article/view/4443/2>.

⁶⁶ U.S. National Library of Medicine, National Institutes of Health, "Gallery of Mobile Apps and Sites."
<http://www.nlm.nih.gov/mobile/index.html>.

Information comes from participating hospitals, as well as cell phones and social networks. In a disaster, this system can help provide reassurance, facilitate family reunification, enhance coordination with disaster-responding nongovernmental organizations, and alleviate some of the workload on public health personnel and other responders who interact with the public.⁶⁷

11. Rescue Disaster Portal

The Rescue Disaster Portal is an easily customized web portal for bidirectional communication between response organizations and the public during disaster and emergency situations. Current features include situation overviews with maps, tools for family reunification, announcements and press information, and donations management. This tool was created by Project Rescue “to transform the ability of responding organizations to gather, manage, use, and disseminate information within emergency response networks.”⁶⁸

12. Rapid Family Tracing and Reunification (RapidFTR)

RapidFTR is an open source mobile phone app and data storage system that helps humanitarian workers expedite the process of collecting, sorting, and sharing information about unaccompanied minors and separated children in disaster situations. Registered children can receive child care services and, hopefully, will be reunited with their families through this data system. It was first developed by the Child Protection in Emergencies Team at the United Nations Children’s Fund (UNICEF). This was the primary system used after the Haiti earthquake.⁶⁹

13. Salvation Army Team Emergency Radio Network

Hosted by the Salvation Army, the Team Emergency Radio Network is a network of Salvation Army volunteers and other amateur radio operator groups that help provide emergency communication when more traditional networks, such as telephones, are not operating. The Salvation Army Team Emergency Radio Network relays critical information regarding the disaster, as well as welfare inquiries. Families can submit an inquiry about a survivor at <http://www.satarn.org>.

14. U.S. Department of Justice National Missing and Unidentified Persons System (NamUs)

NamUs is a national, centralized repository and resources center for missing persons and unidentified decedent records. NamUs is a free online resource that can be searched by coroners, medical examiners, law enforcement officials, and the general public from all over the country in hopes of resolving these cases.

This system consists of three components: the Missing Persons Database, the Unidentified Persons Database, and the Unclaimed Persons Database.

The Missing Persons Database contains information about missing persons that can be entered by anyone; however, the information is verified before it appears as a case on NamUs.

⁶⁷ U.S. National Library of Medicine, Communications Engineering Branch, “Lost Person Finder.” <http://archive.nlm.nih.gov/proj/lpf.php>.

⁶⁸ Rescue Web site. <http://www.itr-rescue.org/>.

⁶⁹ RapidFTR Web site. <http://rapidftr.com>.

The Unidentified Persons Database contains information entered by coroners and medical examiners. Unidentified persons are people who have died and whose bodies have not been identified.

The Unclaimed Persons Database contains information about deceased persons who have been identified by name but for whom no next of kin or family member has been identified or located to claim the body for burial or other disposition.⁷⁰

15. Federal Bureau of Investigation National Crime Information Center (NCIC)

The NCIC system is an electronic clearinghouse of crime data that can be tapped into from virtually every criminal justice agency nationwide. In operation since 1967, NCIC helps criminal justice professionals apprehend fugitives, locate missing persons, recover stolen property, and identify terrorists.⁷¹ This system is divided into 19 files, including a file for missing persons, a national sex offenders registry, and an unidentified persons file.

Criminal justice agencies across the country can enter records into the system. NCIC requires inquiring agencies to contact the entering agency to verify the information found is accurate and current. The Federal Bureau of Investigation provides a host computer and telecommunication lines to a single point of contact in each of the 50 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, and Canada, as well as Federal criminal justice agencies.

⁷⁰ U.S. Department of Justice, Office of Justice Programs: National Missing and Unidentified Persons System Web site. <http://www.namus.gov/>.

⁷¹ Federal Bureau of Investigation, National Crime Information Center Web site. <http://www.fbi.gov/about-us/cjis/ncic>.

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Annex C: Family Emergency Plan Template



Prepare. Plan. Stay Informed. ®

Family Emergency Plan



Make sure your family has a plan in case of an emergency. Before an emergency happens, sit down together and decide how you will get in contact with each other, where you will go and what you will do in an emergency. Keep a copy of this plan in your emergency supply kit or another safe place where you can access it in the event of a disaster.

Out-of-Town Contact Name: _____ Telephone Number: _____
 Email: _____
 Neighborhood Meeting Place: _____ Telephone Number: _____
 Regional Meeting Place: _____ Telephone Number: _____
 Evacuation Location: _____ Telephone Number: _____

Fill out the following information for each family member and keep it up to date.

Name: _____	Social Security Number: _____
Date of Birth: _____	Important Medical Information: _____
Name: _____	Social Security Number: _____
Date of Birth: _____	Important Medical Information: _____
Name: _____	Social Security Number: _____
Date of Birth: _____	Important Medical Information: _____
Name: _____	Social Security Number: _____
Date of Birth: _____	Important Medical Information: _____
Name: _____	Social Security Number: _____
Date of Birth: _____	Important Medical Information: _____
Name: _____	Social Security Number: _____
Date of Birth: _____	Important Medical Information: _____

Write down where your family spends the most time: work, school and other places you frequent. Schools, daycare providers, workplaces and apartment buildings should all have site-specific emergency plans that you and your family need to know about.

Work Location One	School Location One
Address: _____	Address: _____
Phone Number: _____	Phone Number: _____
Evacuation Location: _____	Evacuation Location: _____
Work Location Two	School Location Two
Address: _____	Address: _____
Phone Number: _____	Phone Number: _____
Evacuation Location: _____	Evacuation Location: _____
Work Location Three	School Location Three
Address: _____	Address: _____
Phone Number: _____	Phone Number: _____
Evacuation Location: _____	Evacuation Location: _____
Other place you frequent	Other place you frequent
Address: _____	Address: _____
Phone Number: _____	Phone Number: _____
Evacuation Location: _____	Evacuation Location: _____

Important Information	Name	Telephone Number	Policy Number
Doctor(s):			
Other:			
Pharmacist:			
Medical Insurance:			
Homeowners/Rental Insurance:			
Veterinarian/Kennel (for pets):			

Dial 911 for Emergencies



FEMA

[illegible]



ADDITIONAL IMPORTANT PHONE NUMBERS & INFORMATION:

Family Emergency Plan



EMERGENCY CONTACT NAME: _____

TELEPHONE: _____

OUT-OF-TOWN CONTACT NAME: _____

TELEPHONE: _____

NEIGHBORHOOD MEETING PLACE: _____

TELEPHONE: _____

OTHER IMPORTANT INFORMATION: _____

DIAL 911 FOR EMERGENCIES







ADDITIONAL IMPORTANT PHONE NUMBERS & INFORMATION:

Family Emergency Plan



EMERGENCY CONTACT NAME: _____
TELEPHONE: _____

OUT-OF-TOWN CONTACT NAME: _____
TELEPHONE: _____

NEIGHBORHOOD MEETING PLACE: _____
TELEPHONE: _____

OTHER IMPORTANT INFORMATION: _____

DIAL 911 FOR EMERGENCIES

Ready. 

Annex D: Abbreviations

ACF	Administration for Children and Families
CFR	Code of Federal Regulations
Commission	The National Commission on Children and Disasters
DHS	U.S. Department of Homeland Security
DOJ	U.S. Department of Justice
DUCS	Division of Unaccompanied Children's Services
EOC	Emergency Operations Center
ESF	Emergency Support Function
FEMA	Federal Emergency Management Agency
FERPA	Family Educational Rights and Privacy Act
HHS	U.S. Department of Health and Human Services
HIPAA	Health Insurance Portability and Accountability Act
ICC	Interagency Coordinating Council on Emergency Preparedness and Individuals with Disabilities
ICWA	Indian Child Welfare Act
IDEA	Individuals with Disabilities Education Act
JPATS	Joint Patient Assessment and Tracking System
NamUs	National Missing and Unidentified Persons System
NCIC	National Crime Information Center
NCMEC	National Center for Missing and Exploited Children
NDMS	National Disaster Medical System)
NECLC	National Emergency Child Locator Center
NEFRLS	National Emergency Family Registry and Locator System
NGO	Nongovernmental organizations
NLM	National Library of Medicine
NMETS	National Mass Evacuation Tracking System
NRF	National Response Framework
OHSEPR	Office of Human Services Emergency Preparedness and Response
OJJDP	Office of Juvenile Delinquency and Prevention
ORR	Office of Refugee Resettlement
PKEMRA	Post-Katrina Emergency Management Reform Act of 2006
RapidFTR	Rapid Family Tracing and Reunification
RFID	Radio frequency identification
U.S.C.	United States Code
UAC	Unaccompanied Alien Children
UMR	Unaccompanied Minors Registry
UNICEF	United Nations Children's Fund
UVIS	Unidentified Victim Identification System
VAL	Voluntary Agency Liaison

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Annex E: Definitions

Children: For the purposes of this document, children are dependents under the age of 18. This definition may vary by state. Children with disabilities may remain in school until they are 22, and may also be covered under this definition.

Family Assistance Center: A secure facility established to serve as a centralized location for providing information and assistance about missing or unaccounted for persons and the deceased, and to support the reunification of the missing or deceased with their loved ones.

Family Member: A person related to another person by blood, adoption, or marriage.

Home Rule: Home rule provisions prescribed by state constitutions and statutes specify the extent of the authority of a local government to exercise autonomous control of its operations.

Legal Guardian: An adult with a legal right to physical custody of a minor bestowed by court order or state law.

Missing Children: Children who have become separated from their families and cannot be located.

Orphans: Children deprived of both parents by death.

Parent: The birth parent or adoptive parent of a minor.

Reunification: The process of assisting displaced disaster survivors, including children, to voluntarily re-establish contact with family and friends after a period of separation. The primary focus of this document is on the reunification of children with their parents or legal guardians.

Separated Children: Children who have separated from both parents or from their previous legal or customary primary caregiver, but not necessarily from other relatives. These may, therefore, include children accompanied by other adult family members.

Unaccompanied Minors: Children who have been separated from both parents, legal guardians, and other relatives and are not being cared for by an adult who, by law or custom, is responsible for doing so.

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