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November 23, 2020

Lee A. Norman, M.D., Secretary
lee.norman@ks.gov
Kansas Department of Health and Environment
1000 SW Jackson, Suite 540
Topeka, Kansas 66612-0461

Dear Dr. Norman:

On behalf of the member agencies of the Kansas Public Transit Association I have reviewed the department's COVID-19 Vaccination Plan KANSAS, Version 1.2 found at <https://www.coronavirus.kdheks.gov/DocumentCenter/View/1533/COVID-19-Vaccination-Plan-for-Kansas-Version12-1142020?bidId=>

That plan at page 4 states:

“Critical populations and infrastructure will be identified and estimated through use of the most recent Behavioral Risk Factor Surveillance System (BRFSS) data, American Community Survey (ACS) data, and ESRI Community Analyst data. Critical populations to be gathered through these data sets include: racial and ethnic minority groups; individuals 65 years and older; individuals with disabilities; individuals that are underinsured or uninsured; individuals living in congregate settings; and individuals attending colleges or universities. *Kansas has defined critical infrastructure workforce personnel to include healthcare personnel and other essential workers as included in the Cybersecurity and Infrastructure Security Agency (CISA) 4.0 guidance.*” (emphasis added)

I have consulted the CISA guidance¹. It identifies as essential workers, in part among others:

“Workers needed to support transportation to and from healthcare facility and provider appointments. (p.8)

...

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https://www.cisa.gov/sites/default/files/publications/Version_4.0_CISA_Guidance_on_Essential_Critical_Infrastructure_Workers_FINAL%20AUG%2018v3.pdf

Mass transit workers providing critical transit services and performing critical or routine maintenance to mass transit infrastructure or equipment. (p.15). “

As part of the plan, the following communication activities are to be executed as part of the plan for Kansas across the planning phases:

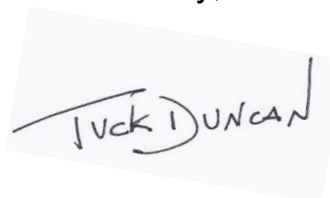
- State and local government; Employers; healthcare providers (including federally funded safety net and in-home care providers); health insurance issuers and plans; Educators; Unions and professional organizations; Organizations serving minority populations and people with disabilities; and community and faith-based groups (p.37) ... *[and]* ...
- KDHE will work closely with partner agencies, representatives of local communities with critical populations, to provide regular updates and seek input. (p.38)

The Kansas Public Transit Association on behalf of all transit workers in Kansas² requests affirmation that the plan envisions that the workers identified above by CISA will be included in the initial priority groups to receive vaccinations once they are approved by FDA and shipped to Kansas.

Further, we request that the association be included as one of those organizations to receive on-going communication about the vaccination process.

It is critical that Kansas' transit workers have access to COVID-19 vaccine in a systematic, rapid, and deliberate manner, preferably in 2020 if possible. *Thank you for your kind attention to and consideration of these matter.*

Sincerely,

A handwritten signature in black ink on a light-colored rectangular piece of paper. The signature reads "TUCK DUNCAN" in a stylized, cursive font. The word "TUCK" is written in a larger, more prominent script, and "DUNCAN" is written in a smaller, more compact script to its right.

R.E. “Tuck” Duncan
Executive Director

² Transit agencies in Kansas include: Urban Fixed Route Systems •Wichita, Topeka, KCATA, Lawrence, Manhattan, Johnson County, Unified Government WyCo/KCK; Rural Public Transit • Nearly 100 Providers •Providers vary in size and coverage area (Cities, Counties, Non-profits, Tribal governments). Elderly and Disabled . Nearly 75 Elderly and Disabled Transit Providers.