



April 6, 2021  
*Via electronic mail*

To the Whitehouse COVID-19 Response Team:

The undersigned members of the Consortium of Citizens with Disabilities (CCD) writes today to outline the transportation limitations and needs of persons with disabilities in order to access the imperative COVID-19 vaccine. We appreciate this opportunity to comment on this critical issue. CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society. Nearly one in four people in the United States has a disability.

This letter is co-authored by the Emergency Preparedness Task Force and the Transportation Task Forces, two separate task forces who care about and advocate strongly for access to the important services needed to fight the Coronavirus.

Despite increasing access to the COVID-19 vaccine, people with disabilities still face a significant hurdle in traveling to vaccine sites. Surveys carried-out by the National Organization on Disability (NOD) have found repeatedly that access to transportation remains a significant barrier for persons with disabilities. This problem has only been exacerbated by the complications of the Coronavirus. This letter will highlight several of the barriers that exist in transportation services that keep people with disabilities from accessing the vaccine.

Inaccessible Transportation Sources:

One popular transportation resource regularly used in 2020 and 2021, especially during the pandemic when public transportation sources have been cut back, are rideshare services such as Uber and Lyft. However, such services are often inaccessible to wheelchair users. A small number of rideshare services have begun to provide wheelchair accessible vehicles. However, the availability is insufficient. The services are only present in a small number of larger cities. And, if a user requests such a ride, they often have to wait a longer time to request and schedule a ride. If a person has a scheduled time to get to a vaccine appointment, it is essential that he or she has access to a ride in a timely manner. Thus, the use of programs like Uber and Lyft are not a sufficient source of transportation for many persons with disabilities.

### Financial Limitations:

Additionally, such rideshare services are often costly. During the pandemic, rideshare availability has declined due to demand changes and driver concerns about safety, and as a result, dynamic pricing has resulted in even higher costs per trip. Without the availability of local vaccination clinics, people may have to travel significant distances to secure an appointment at an accessible location to get the vaccine. The longer the distance, the larger the price of the ride. Persons with disabilities are statistically more likely to live below the poverty line; many live on fixed incomes. Therefore, the financial burden to transport themselves to vaccine locations is problematic.

### Paratransit Limitations:

Under the Americans with Disabilities Act (ADA), public transportation systems must provide a parallel system of transportation that transports people with disabilities from their homes to a requested destination. The requested trip however has to fall within the parameters of the set bus route of the bus system. During the pandemic, there has been much talk about shutting down many public transportation lines. For financial reasons, many systems are forced to do so. However, legally, if the public system pulls back on its services, the paratransit system can legally do the same. Therefore, persons who intend to use paratransit to get to a vaccine site may no longer have the ability to do so.

Furthermore, paratransit users are unfortunately known to be late for appointments. If a person has a scheduled vaccine appointment, missing the appointment is catastrophic. Scheduling an appointment is already difficult; dealing with unreliable paratransit services adds an extra layer of stress. Additionally, under the ADA regulations, once a person has been dropped off for an appointment, the paratransit service does not have to provide a return trip for ninety minutes. So, if a person promptly receives the vaccine, he or she will have to wait ninety minutes to be picked up. And in contrast, if the ride returns before the person receives the vaccine, the paratransit ride will not wait. Finally, many of the mega vaccine sites are drive through only. Typically, a paratransit service would not wait in a long line and allow a passenger to engage in the drive-through process.

### Lack of Access to Public Transportation Systems:

As briefly discussed earlier, for financial reasons, and because less people are using public transit during the pandemic, fewer public transit lines are running in some communities. As a result, a familiar route that a person with a disability uses that could get them to a vaccine site may suddenly be unavailable. The reduction of public transportation services limits options for people with disabilities who routinely use such services to travel independently throughout their communities.

Location of Vaccine Sites:

Statistics also demonstrate that over 500,000 people with disabilities never leave their homes because of transportation challenges. Many of these people may live in rural communities. Even people who do not have a disability are struggling to get to vaccine sites when those sites are located dozens or even hundreds of miles away. When the distance of the site is coupled with a person's disability, the trip becomes even more challenging.

People with disabilities face unique and frequent barriers to accessing transportation that is reliable, timely, convenient, and cost effective. They are often unable to travel everywhere in their communities, limited in when and how often they can travel, and are especially constrained in intercity travel. These barriers place unique challenges on seeking the vaccine as there is often limited choice of when and where to get the vaccine. While there are bright spots of success, we encourage more attention to providing vaccination opportunities in local communities at locations that are transit oriented and easy to access. We also encourage providing alternatives that bring the vaccine directly to individuals who cannot leave their homes or travel to a limited vaccination clinic. These concerns are also relevant to Coronavirus testing.

We would like to call your attention to some examples of actions taken by some transit agencies that have implemented creative projects to provide people with disabilities access to the vaccine: transit agencies have provided fare-free trips for vaccinations; some have modified existing routes to provide direct service to mass vaccination sites; a few have used their transit hub facilities as vaccination sites; and at least one has used its vehicles as a mobile vaccination site. A list of some examples is available at: <https://nationalcenterformobilitymanagement.org/covid-19-resource-center/>. We ask that the White House encourage more of these projects to help people with disabilities access the vaccine.

Thank you for this opportunity to discuss the important challenges faced by the disability community at this time. We look forward to future communications with your committee. Please reach out to Claire Stanley at [Claire.stanley@ndrn.org](mailto:Claire.stanley@ndrn.org) to coordinate further discussions.

Sincerely:

American Council of the Blind

American Foundation for the Blind

American Network of Community Options and Resources (ANCOR)

American Printing House for the Blind (APH)

Association of University Centers on Disabilities

Autistic Self Advocacy Network

Cure SMA

Disability Rights Education and Defense Fund

Easterseals

Epilepsy Foundation

National Association of Councils on Developmental Disabilities

National Disability Rights Network (NDRN)

National Down Syndrome Congress

National MS Society

Paralyzed Veterans of America

Partnership for Inclusive Disaster Strategies

Spina Bifida Association

The Arc

United Cerebral Palsy

United Spinal Association

U.S. International Council on Disabilities

World Institute on Disability