Elizabeth Richter, Acting Administrator  
U.S. Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, Maryland 21244  

January 22, 2021

SUBJECT: Mass vaccination center logistics — Access for vulnerable populations.

Dear Acting Administrator Richter,

President Biden’s plan to accelerate vaccination efforts will hinge on access to vaccination sites for millions of Americans. Many of the distribution events currently being planned make use of public event venues such as sports stadiums to conduct mass vaccination events using a drive-through model. **Without addressing transportation challenges for people who do not drive, drive-through only vaccination sites may not be accessible to many high-risk populations.** We are already seeing reports of seniors — unable to drive long distances over long periods of time — facing transportation issues as they attempt to get to mass vaccination sites¹. We expect this to continue as the vaccine is rolled out to the general population.

We estimate that more than 15 million Americans will face transportation barriers to accessing critical health services, including people with physical disabilities, seniors living alone, the uninsured, and low-income working parents. The experience of Transportation Network Companies (TNCs) like Lyft in moving large numbers of people efficiently and cost-effectively to and from large scale events is directly relevant to the logistical challenges public health officials face with vaccine distribution. Lyft is able to operate its rideshare and micro-mobility networks through a pick-up, drop-off model that provides dedicated zones and lanes for accessibility. **Lyft Healthcare is also one of the largest providers of non-emergency medical transportation (NEMT) services in the United States, providing access to transportation for up to 37 million eligible Medicaid beneficiaries across 14 states and the District of Columbia. There are three things planners can do to ensure mass vaccination sites are accessible to patients who do not drive or face mobility challenges:**

1. **Establish a pick-up and drop-off (PUDO) zone, which includes:**
   - Designated pick-up/drop-off (PUDO) area for patients using taxi, rideshare, or paratransit services
   - Designated areas for bikeshare and scooter parking and/or valet services
   - Accommodations for elderly patients and mobility-impaired patients with seating, wheelchair accessibility, heating and cooling
   - Waiting area to monitor for adverse reactions after the appointment

---

2. If drive-through only, create a separate lane for taxis, paratransit and rideshare vehicles
   - Typically, drive-through vaccination events are designed for car owners. For individuals who need transportation assistance to access the vaccine at a drive-through vaccination event, the cost to get vaccinated can be 5-10 times higher than for those with a car. For individuals dependent upon rideshare and other non-emergency medical transportation services — such as Medicaid beneficiaries — the travel time to the site, plus time spent in line, plus the waiting period required to monitor the patient following vaccination can add up to between $50-$100 per vaccination. If two shots are required, the total cost can be as high as $200 per patient. This is cost-prohibitive for most who do not have transportation costs covered through Medicare, Medicaid, or other programs. For those that do, it is not an efficient use of governmental funds.
   - Creating a separate lane for taxis, paratransit and rideshare vehicles would significantly reduce costs to patients and government insurance programs such as Medicaid —which is responsible for using the lowest cost transportation option — as well as Medicare Advantage.

3. Ensure all drive-through vaccine events allow for scheduled appointments to improve the patient experience, decrease costs and increase adherence to a second dose.
   - This would enable the use of pre-scheduled rides to the scheduled appointment, removing a key barrier to receiving care and appointment adherence.
   - Rideshare and other on-demand transportation platforms use sophisticated software that can be used to schedule rides to vaccination appointments, avoiding long wait times and vehicle congestion.
   - Many healthcare providers and health plans already use these software platforms to schedule rides for patients who need transportation assistance to medical appointments, improving the patient experience and reducing missed appointments by up to 73%.

Transportation access for communities of concern is often overlooked and was left unaddressed in the early stages of planning and preparation for distribution of the vaccine. The data is clear: Racial and ethnic minorities get sick and die of COVID-19 at significantly higher rates than the general population. Forty percent of Lyft rides in the US begin or end in low-income, underserved areas — indicating that these populations already rely on rideshare for critical transport needs\(^2\). It is essential that vaccination efforts are designed with the transportation needs of these populations in mind to ensure that the hardest-hit communities can begin to recover and the US can defeat the COVID-19 pandemic.

Lyft is working with most major health systems as well as state and local health officials on planning and logistics for vaccine distribution efforts. We stand ready to assist you and President Biden’s COVID Response Team in any way we can.

Sincerely,

Megan Callahan, MPH
Vice President, Lyft Healthcare