

February 26, 2021

Karen Timberlake, Secretary  
Department of Health Services  
1 W. Wilson St.  
Madison, Wisconsin 53707

Via email

Re: COVID Vaccine Distribution System

Dear Secretary Timberlake,

DRW strongly objects to DHS's surprise decision this week to create a rigid priority system for phase 1b of the COVID vaccine distribution program. Until the implementation plan for phase 1b was issued this past Tuesday, there was nothing on the main DHS COVID vaccine page which indicated that: 1) no one in phase 1b would get vaccinated until all previously eligible groups had been completed; and 2) once phase 1b started, educators would be the only group actually able to receive it.

We note that the website has only recently been changed to reflect the new system.<sup>1</sup> When we checked it on Tuesday evening, February 23<sup>rd</sup>, it still said that all phase 1b groups would be eligible to begin receiving vaccine on March 1<sup>st</sup>. The only caveat related to vaccine supply. There was nothing about a priority system for phase 1b or the new requirement that all members of already eligible groups get vaccinated before phase 1b could even begin. Based on the information that had been on the website, DRW and many other advocacy and service agencies had been telling our constituents who are in Family Care, IRIS, CLTS or Katie Beckett that they could begin looking to receive vaccine on March 1. As we now know that date was a fiction.

The SDMAC Vaccine Distribution Subcommittee did not prioritize within phase 1b and there was no opportunity for the public to comment on the priority system that the SDMAC apparently adopted. The lack of transparency on the part of DHS on what is an issue of critical public interest during this pandemic is not acceptable.

There is no "phase" system at all. There are, in fact, 6 sequential eligibility groups, each of which must be fully vaccinated before the next group becomes eligible. Those groups are:

Group 1: Health care workers, people in long term care facilities, police, fire and correctional staff, people age 65 and older

Group 2: Educators and childcare workers

---

<sup>1</sup> [COVID-19: Am I Eligible for the Vaccine? | Wisconsin Department of Health Services](#)

Group 3: Family Care members, IRIS participants, older CLTS and Katie Beckett recipients

Group 4: Some public facing essential workers (911 operators, food supply chain workers, public transit workers, utility workers)

Group 5: Nonessential health care personnel

Group 6: people living in congregate living situations (incarcerates)

Given that we are not yet even halfway through the age 65+ group, and that there are between 225,000 and 275,000 people in the educator group, DHS now estimates that people enrolled in long term care programs will not receive a dose of vaccine until “April or May.” Incarcerates, another group of people DRW is deeply concerned about, will be even further out. And we have not even begun to think about the group of people with disabling comorbidities (immuno-compromised conditions, diabetes, respiratory conditions, intellectual disability, etc.) who are under age 65 and who do not happen to be in Family Care or IRIS.

The failure of DHS to be forthright about its plan to rigidly prioritize groups and use a strict gating system greatly undermines the confidence people with disabilities have in DHS’s vaccine effort. It also calls into question DHS’s commitment to ensure the health and safety of populations that are at high risk for bad outcomes from COVID.

We strongly urge the Department to return to the system it had been using until this past Tuesday. That system gave equal access to all groups in each phase and allowed the phases to overlap (i.e., we did not wait until all the health care workers were vaccinated before we began vaccinating people 65 and older). The system DHS has developed is cumbersome, confusing, and leading to the feeling that it is also just unfair. The last thing this state needs right now is more distrust of its administrative agencies.

Please contact me if you have any questions,

Sincerely,



Lea Kitz

Executive Director