

Coronavirus pandemic in the EU – Fundamental Rights implications National vaccine deployment

Austria

5 May 2021

**Contractor: European Training and Research Centre for
Human Rights and Democracy (ETC Graz)**

DISCLAIMER: This document was commissioned under contract as background material for comparative analysis by the European Union Agency for Fundamental Rights (FRA) for the project 'Coronavirus pandemic in the EU – Fundamental Rights implications'. The information and views contained in the document do not necessarily reflect the views or the official position of the FRA. The document is made publicly available for transparency and information purposes only and does not constitute legal advice or legal opinion.

Table of contents

1. National vaccine deployment – planning and overview of priority groups.....	3
2 Vaccination rollout – communication, targeted outreach, registration, and administration of vaccinations	10
2.1. Channels, means and measures to inform about the national vaccination plan	10
2.2. What are the (pre-) registration channels for vaccination put in place?.....	11
2.3. How are the vaccinations administered?	13
3. Challenges and promising practices.....	15
3.1 Challenges	15
3.2. Promising practices.....	16

1. National vaccine deployment – planning and overview of priority groups

In Austria, vaccinations follow a de-centralized approach and are administered by the federal provinces (*Bundesländer*). There are two binding guidelines for vaccinating bodies: the general national vaccine deployment plan¹ and the corresponding and more elaborated COVID-19 prioritisation² (*Priorisierung*) of target groups by the National Vaccination Council (*Nationales Impfgremium*). The national vaccine deployment plan outlines three general vaccination phases defined according to vaccine availability and resulting focal points. The prioritisation elaborates the target groups within these phases. Within these plans, operationalization within the federal provinces is flexible.³ Each federal province has its own implementation and operationalization plan which specifies regional strategies in line with the guidelines set in the national vaccine deployment plan and the COVID-19 prioritisation.

Specific groups identified in the national vaccine deployment plan	Date of plan	Date of new/revised plans	Date of new/revised plans	Date of new/revised plans
	COVID-19 Vaccines: Prioritisation of the National Vaccine Council (COVID-19 Impfungen: Priorisierung des Nationalen Impfgremiums) Version 1: 14.12.2020 Link to COVID-19 prioritisation	COVID-19 Vaccines: Prioritisation of the National Vaccine Council (COVID-19 Impfungen: Priorisierung des Nationalen Impfgremium) Version 2.1: 26.12.2021	COVID-19 Vaccines: Prioritisation of the National Vaccine Council (COVID-19 Impfungen: Priorisierung des Nationalen Impfgremiums) Version 3:	COVID-19 Vaccines: Prioritisation of the National Vaccine Council (COVID-19 Impfungen: Priorisierung des Nationalen Impfgremiums) Version 4:

¹ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, COVID-19 vaccination plan ([COVID-19 Impfplan](#)), version from 12 March 2021.

² Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, COVID-19 vaccinations: prioritisation of the National Vaccination Council ([COVID-19 Impfungen: Priorisierung des Nationalen Impfgremiums](#)), Version 4.0, 31 March 2021.

³ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, Presentation to the Council of Ministers: Further implementation of the COVID-19 Vaccination Strategy ([Vortrag an den Ministerrat: Weitere Umsetzung der COVID-19 Impfstrategie](#)), 2021-0.060.730, 4 February 2021.

		1. Link to COVID-19 prioritisation	12.1.2021 Link to COVID-19 prioritisation	31.3.2021 2. Link to COVID-19 prioritisation Version 4.1: 28.4.2021 Link to COVID-19 prioritisation
<i>older persons; indicate age groups specified</i>	<p>(1) persons aged 80 and above as well as immediate contact persons (subject to availability of vaccine)</p> <p>(1) residents living in old people's and care homes (<i>Alten- und Pflegeheime</i>) as well as immediate contact persons (subject to availability of vaccine)</p> <p>(2) persons aged 75-79</p> <p>(3) persons aged 70-74 years</p> <p>(4) persons aged 65-69 and above</p> <p>(5) persons aged 60-64 years</p> <p>(7) persons between 16 and < 60 years</p>	No change	<p>One change in wording:</p> <p>(1) residents living in old people's, elderly and care homes (<i>Alten-, Pflege- und Seniorenheime</i>)</p> <p>One specification:</p> <p>(7) persons between 16 (for Pfizer/BioNtech) or 18 (Moderna) years and 60 years</p>	No change
<i>persons with underlying</i>	(2) persons with pre-existing conditions and	No change	Two	No change

health problems	<p>high risk, especially if in institutional care</p> <p>(3) persons with pre-existing conditions and increased risk, including close contact persons, support staff, personal caretakers etc.</p>		<p>amendments:</p> <p>(2) persons (regardless of age) with pre-existing conditions and high risk</p> <p>(3) persons (regardless of age) with pre-existing conditions and increased risk</p>	
persons with disabilities	<p>Included in (1) residents of old people's and care homes (<i>Alten-, Pflegewohnheime</i>),</p> <p>Included in "persons with underlying health problems" - (2) persons with pre-existing conditions and high risk</p>	No change	Specification to (2) persons (regardless of age) with pre-existing conditions and high risk	No change
key workers (on the basis of their job not their personal characteristics) – e.g. health workers; persons working in care homes; teachers	<p>(1) staff members of old people's and care homes (<i>Alten-/Pflege-/Seniorenwohnheime</i>) with and without contact to residents, as well as persons with regular stays in such homes</p> <p>(1) healthcare staff with particularly high risk of exposition to COVID-19 and/or with close contact to vulnerable groups (staff category 1)</p>	<p>Addition:</p> <p>(3) persons in prison as well as staff members</p> <p>Moved from (4) to (3):</p> <p>(3) complete staff in schools, kindergardens, childcare centres</p> <p>Rephrased:</p>	<p>New category encompassing three previous specifications on homeless shelters, prisons and asylum quarters:</p> <p>(3) workers and residents in shared accommodation or tight/precarious living or working conditions (eg.</p>	No change

	<p>(2) workers in institutions hosting persons with pre-existing conditions and high risk of infection</p> <p>(2) healthcare workers with high risk of exposition (staff category 2)</p> <p>(2) workers in mobile care and 24-h care</p> <p>(3) staff members (and residents) in asylum quarters</p> <p>(3) staff members (and residents) in homeless shelters</p> <p>(3) healthcare staff with moderate risk of exposition and/or in positions required for upholding hospital and healthcare infrastructure (staff category 3)</p> <p>(3) staff in social care, pastoral care (<i>Seelsorge</i>) and funeral services</p> <p>(4) complete staff in schools, kindergartens, childcare centres</p> <p>(4) healthcare staff with little risk of exposition (staff category 4)</p> <p>(4) Persons working in working conditions conducive to the virus, including working in</p>	<p>(4) workers in an environment conducive to virus transmittal (no minimum distance, cool areas, etc)</p>	<p>homeless shelters)</p>	
--	--	--	---------------------------	--

	<p>cramped or cool spaces</p> <p>(4) staff in key positions in provincial and federal governments, staff members in essential infrastructure, esp. with increased contact with others persons</p> <p>(5) salespersons</p> <p>(5) persons in gastronomy and tourism</p> <p>(5) persons whose job requires crossing borders (public transport, airplanes, etc)</p> <p>(5) workers with in-person contact and non-medical services</p> <p>(5) cultural workers with increased risk of infection (theatre, film, music, etc)</p> <p>(5) professional sports professionals and other jobs with ongoing, close contact</p> <p>(6) persons in educational facilities, including higher education with large masses of people</p>			
<i>persons belonging to ethnic/national minorities</i>	No	No change	No change	No change

<i>persons experiencing homelessness</i>	Only for those in homeless shelters, included in (3) staff members (and residents) in homeless shelters	No change	Rephrased and included in new umbrella category: (3) residents in shared accommodation or tight/precarious living or working conditions (eg. homeless shelters)	No change
<i>persons with drug addiction dependencies</i>	No	No change	No change	No change
<i>persons with low literacy levels</i>	No	No change	No change	No change
<i>persons deprived of their liberty</i>	No	Addition: (3) persons in prisons as well as staff members	Rephrased and included in new umbrella category: (3) residents in shared accommodation or tight/precarious living or working conditions (e.g. homeless shelters)	No change
<i>persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented)</i>	(3) asylum seekers in asylum quarters	No change	Rephrased and included in new umbrella category: (3) residents in shared accommodation or	No change

<i>migrants)</i>			tight/precarious living or working conditions (e.g. homeless shelters), if applicable	
<i>OTHER – not specified above; e.g. ‘Persons living in crowded accommodation’; etc.</i> <i>Please insert . . .</i>	(3) contact persons of pregnant persons due to the risk of a severe course of the disease (5) persons taking part in sports with ongoing and close personal contact (5) culture workers in private areas with increased risk of infection (amateurs, choirs, etc) (5) persons who have to travel across borders for private reasons	No change	No change	New additions: (5) women before receiving fertility treatment (6) women wishing to have children soon Small amendment in version 4.1 (28 April 2021): (3) Pregnant women in the 2 nd and 3 rd trimester

Reasons behind major changes with regard to priority groups– as announced by the government.

In Austria, the National Vaccination Council (*Nationales Impfgremium*) explained in November 2020 that the prioritization of target groups would continuously be adapted based on newly gained scientific knowledge, characteristics of vaccine candidates, availability of vaccines, indication and licencing of available vaccines,

as well as the epidemiological situation at the time of vaccination.⁴ As is shown in the table above, no major changes to the prioritisation were implemented. Correspondingly, no reports are available detailing the concrete reasoning behind the implemented amendments.

Overall approach behind the definition of priority groups: please identify the main ground for identifying groups as priority group (vulnerability to infection; social vulnerability; multiple criteria).

In Austria, the definition of priority groups is based on risk assessment relating to personal as well as systemic risk, in line with the recommendations of the World Health Organization.⁵ Priority groups are defined based on risk of a serious course of the disease, a heightened risk of dying, as well as high risk of infection due to activity within critical infrastructure (healthcare staff, etc).⁶

2 Vaccination rollout – communication, targeted outreach, registration, and administration of vaccinations

2.1. Channels, means and measures to inform about the national vaccination plan

In Austria, the Austrian Red Cross (*Österreichisches Rotes Kreuz*) conceptualized and has coordinated a national vaccination campaign in cooperation with the Federal Government since March 2021. According to a media report, the campaign “Austria vaccinates initiative” (*Initiative Österreich impft*) features a website⁷ as well as campaigns in traditional and social media.⁸ The language of the website and campaign is German. The campaign is realized together with several hundred partners from civil society, business, etc. The Federal

⁴ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, Presentation to the Council of Ministers: COVID-19 Vaccination strategy ([Vortrag an den Ministerrat: COVID-19 Impfstrategie](#)), 2020-0.776.318, 24 November 2020.

⁵ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, Presentation to the Council of Ministers: COVID-19 Vaccination strategy ([Vortrag an den Ministerrat: COVID-19 Impfstrategie](#)), 2020-0.776.318, 24 November 2020.

⁶ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, COVID-19 vaccinations: prioritisation of the National Vaccination Council ([COVID-19 Impfungen: Priorisierung des Nationalen Impfgremiums](#)), Version 4.0, 31 March 2021.

⁷ Österreichisches Rotes Kreuz, [website on vaccinations in Austria](#) (Österreich impft).

⁸ Oe1.orf.at (2021), [Corona Impfungen: Eine Kampagne auf Nadeln](#), 8 March 2021.

Government pays for ads and media spots, which are also disseminated by the Austrian Broadcasting Service (*Österreichischer Rundfunk, ORF*).⁹

In Austria, the Austrian Integration Fund (*Österreichischer Integrationsfonds, ÖIF*) provides updated information and an extensive FAQ section about COVID-19 safety measures as well as the vaccination in 17 languages besides German.¹⁰ Information is updated on a regular basis based on new developments. Pre-registration follows a decentralized approach within the nine federal provinces (*Bundesländer*). Some federal provinces have made available information on provincial vaccination strategies in different languages (Vorarlberg in 8 further languages¹¹, Burgenland in Hungarian, Croatian, Slovene¹², Salzburg in 11 further languages¹³).

In Austria, the Federal Minister of Social Affairs, Health, Care and Consumer Protection published an explanatory video on the vaccine deployment plan and logistics behind it in easy language.¹⁴

A simplified, illustrated version of the vaccination deployment plan is made available in six foreign languages: English, Turkish, Bosnian, Croatian, Serbian, Romanian.¹⁵ The graphic includes a depiction of the three vaccine deployment phases as well as information about which target groups belong to which priority group.

2.2. What are the (pre-) registration channels for vaccination put in place?

- a) What registration channels for vaccination are in place e.g. websites, apps, hotlines/call centres, letters, via family doctors, etc.?

In Austria, pre-registration follows a decentralized approach within the nine federal provinces (*Bundesländer*). The Austrian Red Cross (*Rotes Kreuz*) in

⁹ Oe1.orf.at (2021), [Corona Impfungen: Eine Kampagne auf Nadeln](#), 8 March 2021.

¹⁰ Austrian Integration Fund, [Website on Corona virus safety measures and vaccines](#). The website is available in Albanian, Arabic, Bosnian/Croatian/Serbian, Mandarin, English, Farsi, French, Hungarian, Korean, Kurdish, Pashto, Polish, Romanian, Russian, Somali, Turkish, and Ukrainian.

¹¹ Federal Province Vorarlberg, [Guide on Corona vaccination pre-registration system](#). Besides German, information is available in Arabic, Bosnian/Croatian/Serbian, English, Farsi, Romanian, Russian, Turkish and Hungarian.

¹² Federal Province Burgenland, [Information on Corona vaccination strategy in Burgenland](#).

¹³ Federal Province Salzburg, [Information on Corona vaccination strategy in Salzburg](#).

¹⁴ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, [website on questions about Corona vaccination for persons with disabilities](#).

¹⁵ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, [website on Corona vaccination: implementation and organisation](#).

cooperation with the Federal Government has made available a centralized information website. The website features links to the nine pre-vaccination registration portals of the federal provinces.¹⁶ The websites of the individual federal provinces are in German, some provinces have made available registration in other languages (Turkish in Vienna¹⁷, English in Lower Austria¹⁸ and Salzburg¹⁹, Slovene and Italian in Carinthia²⁰). All federal provinces have implemented online registration forms, some offer additional channels: via telephone (Vienna, Salzburg), at the Municipal Government without further specification (Lower Austria, Carinthia), or at resident physicians without further specification (Vienna, Salzburg).²¹ No information on barrier-free access to individual vaccination centres is provided.

- b) Are any alternatives to digital access to vaccine registration in place e.g. appropriate support for those who need it (such as the elderly; those without access to the internet); physical locations for registration etc?

In Austria, each federal province has different pre-registration measures in place. Most federal provinces offer online registration only, stating to ask family or friends for assistance in case it is not possible to register by oneself.²² Additional pre-registration measures are in place in selected federal provinces, including Vienna and Salzburg (registration via hotline), Carinthia and Lower Austria (registration via the Municipal Government without further specification) and Salzburg (at resident physicians). Vorarlberg offers telephone assistance for using the website as well as a user handbook on how to use the registration platform.²³ Burgenland²⁴ and Carinthia²⁵ have made available short German language videos explaining the respective pre-registration portals.

¹⁶ Österreichisches Rotes Kreuz, [website on vaccination pre-registrations in Austria](#) (Österreich impft).

¹⁷ Impfservice Wien, Registration [website for Corona vaccination in Vienna](#).

¹⁸ Federal Province Niederösterreich, Registration [website for Corona vaccination in Lower Austria](#).

¹⁹ Federal Province Salzburg, [Registration website for Corona vaccination in Salzburg](#).

²⁰ Federal Province Kärnten, [Registration website for Corona vaccination in Carinthia](#).

²¹ Österreichisches Rotes Kreuz, [website on vaccination pre-registrations in Austria](#) (Österreich impft).

²² Österreichisches Rotes Kreuz, [website on vaccination pre-registrations in Austria](#) (Österreich impft).

²³ Österreichisches Rotes Kreuz, [website on vaccination pre-registrations in Austria](#) (Österreich impft).

²⁴ Federal Province Burgenland, [Video guides on the Corona vaccination pre-registration system in Burgenland](#).

²⁵ Kärnten Impft Vormerkplattform, [Video guide on the Corona vaccination pre-registration system in Carinthia](#), 3 February 2021.

2.3. How are the vaccinations administered?

- a) Where are the vaccinations administered e.g. vaccination centres, via mobile units, via family doctors, etc.?

In Austria, administering vaccinations follows a de-centralized approach within the different federal provinces. According to the presentation of the vaccination deployment plan to the Federal Council of Ministers (*Ministerrat*), so-called „vaccine coordinators“ are defined in (public) institutions and offices as well as (larger) companies, who are entrusted with organizing the administration of vaccines together with responsible people from the federal provinces and the Austrian military service.²⁶ The strategies implemented vary by province and depend on institutional set-up: for example, some federal provinces (Tirol²⁷, Vienna²⁸, Carinthia²⁹) cooperate with the Austrian Health Insurance (*Österreichische Gesundheitskasse, ÖGK*) and opened test centres and “vaccination avenues” (*Impfstraßen*). Other federal provinces make use of mobile vaccination teams, for example via the Austrian Red Cross (*Österreichisches Rotes Kreuz*), who visit old people’s and care homes (Vienna³⁰, Styria³¹, Salzburg³²). Others have allowed for the high-risk group and over 80-year-olds to be vaccinated by resident doctors (*Lower Austria and Burgenland*³³). In phase two of the Austrian vaccination deployment plan, it is envisioned that resident doctors begin administering vaccinations across the federal provinces.³⁴

In Austria, a decree³⁵ was published on 3 December 2020, stating that all doctors, irrespective of their specializations, including general practitioners may administer the COVID-19 vaccine. This includes occupational physicians and school physicians. Also, rotation doctors, foreign doctors, retired doctors and medical students may administer COVID-19 vaccines as long as their activity

²⁶ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, Presentation to the Council of Ministers: COVID-19 Vaccination strategy ([Vortrag an den Ministerrat: COVID-19 Impfstrategie](#)), 2020-0.776.318, 24 November 2020.

²⁷ Austrian Health Insurance (2021), [ÖGK unterstützt Land Tirol bei Impfung gegen Covid-19](#).

²⁸ Austrian Health Insurance (2021), [Wir impfen!](#), 25 March 2021.

²⁹ Austrian Health Insurance (2021), [COVID-19 Impfungen 80plus – Durchführung von mehr als 5.100 Impfungen](#).

³⁰ Austrian Red Cross, [website on COVID-19 vaccination in Vienna](#).

³¹ ORF Steiermark (2021), [‘Wer sich wann impfen lassen kann’](#), 29 March 2021.

³² ORF Salzburg (2021), [‘Impfung zu Hause: Mobile Teams für Gehbehinderte’](#), 12 April 2021.

³³ Wiener Zeitung (2021), [‘Massenimpfungen überfordern Hausärzte’](#), 19 January 2021.

³⁴ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, COVID-19 vaccination plan ([COVID-19 Impfplan](#)), version from 12 March 2021.

³⁵ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, Professional legal requirements for the implementation of COVID-19 vaccinations ([Berufsrechtliche Voraussetzungen zur Durchführung von COVID-19 Impfungen](#)), 2020-0.777.509, 3 December 2020.

takes place in a structured setting and under the supervision of a practicing doctor.

- b) For those being vaccinated - how is information about the actual vaccination process, the vaccine and any potential side effects provided?

In Austria, administering vaccinations follows a de-centralized approach within the different federal provinces. Each federal province implements its own operationalization strategy. Pre-registered persons are contacted – depending on priority group and vaccination plan of the federal province – when it is possible to make a concrete vaccination appointment. The National Vaccine Council (*Nationales Impfgremium*) published a document with recommendations on implementation of the vaccination strategy directed at those administering vaccines, stating persons should be informed about possible reactions, side effects and thromboses.³⁶ Basic information on these subjects is contained in the document.³⁷ The Federal Ministry of Social Affairs, Health, Care and Consumer Protection further made available a general information and documentation form to be used by venues offering the vaccine across the federal provinces.³⁸ The form includes a paragraph on side effects as well as a link and QR Code referring to the Federal Office for Safety in Healthcare³⁹ (*Bundesamt für Sicherheit im Gesundheitswesen, BASG*), which features detailed information on each of the vaccines available. The information and documentation form is available in six foreign languages: English, Turkish, Bosnian, Serbian, Croatian and Romanian.⁴⁰

In Austria, the Federal Ministry of Social Affairs, Health, Care and Consumer Protection made available an information document to be used by old people's and care homes offering the vaccine to their residents.⁴¹

³⁶ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, COVID-19 vaccinations: implementation recommendations of the National Vaccine Council ([COVID-19-Impfungen: Anwendungsempfehlungen des Nationalen Impfgremiums](#)), Version 3.2, 28 April 2021.

³⁷ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, COVID-19 vaccinations: implementation recommendations of the National Vaccine Council ([COVID-19-Impfungen: Anwendungsempfehlungen des Nationalen Impfgremiums](#)), Version 3.2, 28 April 2021.

³⁸ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, [website on Corona vaccination: implementation and organisation](#).

³⁹ Austria, Federal Office for Safety in Healthcare, [website on COVID-19 vaccinations](#).

⁴⁰ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, [website on Corona vaccination: implementation and organisation](#).

⁴¹ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, [website on Corona vaccination: implementation and organisation](#).

- c) Are there any circumstances where fees are applicable for receiving the vaccine – e.g. for third country nationals?

In Austria, the website of the Federal Chancellery states the COVID-19 vaccination is free for “all persons living in Austria” (*alle in Österreich lebenden Menschen*).⁴² According to the national vaccine deployment plan, those “living or working in shared accommodation, in tight/precarious living conditions and/or working conditions”, i.e. also asylum seekers living in asylum quarters⁴³, are in priority group three of seven.⁴⁴

3. Challenges and promising practices

3.1 Challenges

In Austria, several media outlets have reported about problems arising with the decentralized approach to vaccination management. Both the Austrian Broadcasting Service⁴⁵ (*Österreichischer Rundfunk, ORF*) and the *Der Standard*⁴⁶ newspaper highlight that vaccines have been administered unevenly in the federal provinces, both in terms of number and target group: this is due to uneven vaccine allotments, different regional prioritisations within the national vaccination deployment plan, and varying infrastructural settings. Reports from 3 May 2021 show that 78% of persons aged 65+ have been vaccinated in the federal province of Burgenland, whereas it is only 62% in Vienna.⁴⁷ The magazine *Profil* pointed to lacking sanctions for deviations from the national vaccination deployment plan, citing examples of doctors vaccinating their immediate family members, or pastors who were vaccinated despite not being in the defined target group foreseen in the vaccination phase.⁴⁸ The NGO *Bizeps*, which represents persons with disabilities, criticized this decentralized approach which leads to some provinces lagging behind and leaving vulnerable groups

⁴² Austria, Federal Chancellery, [website on frequently asked questions about the COVID-19 vaccination](#).

⁴³ ORF Lower Austria (2021), '[FPÖ-Kritik an Impfung für Asylwerber](#)', 2 April 2021.

⁴⁴ Austria, Federal Ministry of Social Affairs, Health, Care and Consumer Protection, COVID-19 vaccinations: prioritisation of the National Vaccination Council ([COVID-19 Impfungen: Priorisierung des Nationalen Impfgremiums](#)), Version 4.0, 31 March 2021.

⁴⁵ ORF News (2021), '[Deutliche Unterschiede zwischen Ländern](#)', 3 February 2021.

⁴⁶ Der Standard (2021), '[Wie die COVID-19-Impfanmeldung in den Bundesländern funktioniert](#)', 21 January 2021.

⁴⁷ ORF News (2021), '[Impfung der Senioren noch nicht am Ziel](#)', 3 May 2021.

⁴⁸ Profil (2021), '[Impfen: Neun-Klassen-Medizin](#)', 14 April 2021.

unprotected.⁴⁹ The NGO *Hilfswerk* stated the same with regards to their mobile care teams.⁵⁰

In Austria, the de-centralized online pre-registration for the COVID-19 vaccine is not barrier free. The Council for Persons with Disabilities (*Behindertenrat*) criticized that persons with disabilities are being excluded from the online pre-registration system, particularly blind persons or those with visual impairments.⁵¹ The registration portals offered are negative examples realized without the inclusion of experts.⁵² A parliamentary enquiry was submitted on 4 February 2021, asking about the lack of barrier free measures.⁵³ The Federal Minister of Social Affairs, Health, Care and Consumer Protection responded, stating that ensuring barrier free access to the registration portals is within the competency of the federal provinces.⁵⁴

3.2. Promising practices

Nothing to report.

⁴⁹ Bizeps (2021), [SLIÖ kritisiert unterschiedliche Impfstrategien der Bundesländer](#), press statement, 25 March 2021.

⁵⁰ Hilfswerk (2021), [Tausende Pflegekräfte warten bisher vergeblich auf COVID-19 Schutzimpfung: Gerade jetzt fatal, meint das Hilfswerk](#), 23 January 2021.

⁵¹ Österreichischer Behindertenrat (2021), [Online-Impfanmeldung für Alle? Nein!](#), press statement, 25 January 2021.

⁵² Österreichischer Behindertenrat (2021), [Online-Impfanmeldung für Alle? Nein!](#), press statement, 25 January 2021.

⁵³ Verena Nussbaum and colleagues, [parliamentary enquiry on missing barrier free access at online vaccine registration](#), 5222/J XXVII.GP, 4 February 2021.

⁵⁴ Rudolf Anschöber, Federal Minister of Social Affairs, Health, Care and Consumer Protection, [response to parliamentary enquiry on missing barrier free access at online vaccine registration](#), 2021.-0.164.803, 24 March 2021.