

Memorandum

To: CISA.CAT@CISA.DHS.GOV
Attn: Christopher C. Krebs, Director
Cybersecurity and Infrastructure Security Agency

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SUBJECT: MEMORANDUM ON IDENTIFICATION OF ESSENTIAL CRITICAL
INFRASTRUCTURE WORKERS DURING COVID-19 RESPONSE

On March 19, 2020, the Cybersecurity and Infrastructure Security Agency (CISA) issued a mandate which stated “in collaboration with other federal agencies and the private sector, CISA developed an initial list of ‘Essential Critical Infrastructure Workers’ to help State and local officials as they work to protect their communities, while ensuring continuity of functions critical to public health and safety, as well as economic and national security. The list of Essential Critical Infrastructure Workers was intended to “inform critical infrastructure community decision-making to determine the sectors, sub-sectors, segments, or critical functions that should continue normal operations, appropriately modified to account for Centers for Disease Control (CDC) workforce and customer protection guidance.”

The purpose of this memorandum is to provide stakeholder feedback on the list of Essential Critical Infrastructure Workers (both sectors/sub-sectors and identified essential workers), so that CISA can develop and evolve the list in response to such feedback.

According to CISA, the Transportation Systems Sector consists of the following key sub-sectors, or modes:

Aviation includes aircraft, air traffic control systems, and about 19,700 airports, heliports, and landing strips. Approximately 500 provide commercial aviation services at civil and joint-use military airports, heliports, and sea plane bases. In addition, the aviation mode includes commercial and **recreational aircraft** (manned and unmanned) and a wide-variety of support services, such as aircraft repair stations, fueling facilities, navigation aids, and **flight schools**.

See <https://www.cisa.gov/transportation-systems-sector> (emphasis added).

On March 19, 2020, CISA listed the following Essential Critical Infrastructure Workers from the Transportation and Logistics Sector:

- Employees who repair and maintain vehicles, aircraft, rail equipment, marine vessels, and the equipment and infrastructure that enables operations that encompass movement of cargo and passengers.
- Air transportation employees, including air traffic controllers, ramp personnel, aviation security, and aviation management.

Additionally, CISA listed Other Community-Based Government Operations And Essential Functions as follows:

- Workers who support necessary credentialing, vetting and licensing operations for transportation workers.

The aviation sub-sector stakeholders involved with operation of recreational aircraft and flight schools, who employ Essential Critical Infrastructure Workers from the Transportation Sector, support necessary credentialing, vetting and licensing operations for transportation workers seeking pilot certification by the Federal Aviation Administration. Since CISA intended to be overly inclusive to reflect the diversity of industries, the aviation mode stakeholders understand that essential employees involved with the operation of recreational aircraft and flight schools continue to be identified as Essential Critical Infrastructure Workers from the Transportation Sector.

Accordingly, the aviation sub-sector stakeholders who employ Essential Critical Infrastructure Workers from the Transportation Sector will continue to operate recreational aircraft and flight schools, appropriately modified to account for CDC workforce and customer protection guidance, based upon the CISA memorandum dated March 19, 2020.

If you have any questions or require additional information, please don't hesitate to contact me.

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