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From: John Armeno <jarmeno@optonline.net>
Sent: Tuesday, January 26, 2021 9:52 AM
To: Anthony Basantis; Anthony Cureton ; Armando Fontoura (Armando Fontoura); Bob Nolan; Carmel Morina (Carmel Morina); Chuck Miller ; Darring Russo; Eric Scheffler; Frank Schillari; Fred Brown; Gilbert Wilson; James J. McDonald; James M. Gannon; John Kemler; Michael Mastronardy; Michael Strada; Mildred.scott@co.middlesex.nj.us'; Peter Corvelli; Richard Berdnik; Robert Austino; Shaun Golden
Subject: FW: May a Public Employer Require Vaccination Against COVID-19? For the most part, the answer is "yes."
Attachments: SOG Blog - Requiring COVID-19 Vaccination - January 4, 2021.pdf

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From: Eddie Caldwell <ecaldwell@ncsheriffs.net>
Sent: Monday, January 25, 2021 8:00 AM
To: NCSA List --- Sheriffs and Sheriffs' Personnel <sheriffs-and-sheriffs-personnel@list.ncsheriffs.net>
Subject: May a Public Employer Require Vaccination Against COVID-19? For the most part, the answer is "yes."

To: All Sheriffs

We have been asked whether a sheriff can require sheriff's office employees to take the vaccination against COVID-19.

That question is addressed thoroughly in the blog post attached to this email written by Diane M. Juffras. Ms. Juffras is the Albert and Gladys Hall Coates Distinguished Term Professor of Public Law and Government at the School of Government of The University of North Carolina at Chapel Hill. She may be reached at 919-843-4926 and at juffras@sog.unc.edu

If you have questions or need additional information on this topic, please contact Ms. Juffras directly.

Thanks.....Eddie C.



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Coates' Canons Blog: May a Public Employer Require Vaccination Against COVID-19?

By Diane Juffras

Article: <https://canons.sog.unc.edu/may-a-public-employer-require-vaccination-against-covid-19/>

This entry was posted on December 20, 2020 and is filed under Discipline & Discharge, Employment, Featured Posts Related To COVID-19, General Local Government (Miscellaneous), Medical Inquiries & Medical Testing, Miscellaneous

UPDATED JANUARY 4, 2021

Every year many employers choose to require employees to undergo vaccination against seasonal influenza (flu). This year, however, a different decision will confront employers: whether to require employees to undergo vaccination against COVID-19.

The flu vaccine has been around for a long time and its side effects and efficacy are well understood. The COVID-19 vaccines—two already in use, others on the way—are new. Several of them use new methods. Government employers and employees want to know: may a public employer require employees to be vaccinated against COVID-19?

For the most part, the answer is “yes.”

Background

The Development and Approval of COVID-19 Vaccines

In the United States, vaccines must be approved by the Food and Drug Administration (FDA) before they can be marketed and distributed. This is normally a lengthy process. In extraordinary circumstances, a vaccine that has not yet been formally approved by FDA can be granted emergency use authorization (EUA), allowing an otherwise unapproved product to be used and distributed during a public health or other emergency. The FDA decides whether to issue an EUA for a vaccine based on data about safety and effectiveness from completed or ongoing clinical trials in volunteers. It evaluates whether the known and potential benefits outweigh the known and potential risks of the vaccine. Manufacturers of vaccines are required to continue their clinical trials in volunteers and to monitor the vaccine for safety and effectiveness after an EUA is granted. For an explanation of how an EUA differs from a regular FDA approval, see [here](#), [here](#) and [here](#).

The Advisory Committee on Immunization Practices (ACIP) of the federal Centers for Disease Control and Prevention (CDC) also performs a separate analysis of vaccine candidates and makes recommendations for their use. Among other things, ACIP makes recommendations about who should receive a particular vaccination, and identifies any medical contraindications to the vaccine. .

At the time of this writing, two COVID-19 vaccines have received EUAs from the FDA and have been recommended for use by ACIP. Clinical trials of additional vaccines are underway and it appears likely that more authorizations will be issued in the coming months.

Public Employers May Require Vaccination Against COVID-19

Nothing prohibits a North Carolina public employer from requiring some or all of its employees to be vaccinated against particular illnesses, including COVID-19. So long as a vaccine has been authorized for use by the FDA, ***an employer may require all of its employees to be vaccinated as a condition of employment, subject only to medical exceptions required by the ADA and religious exceptions required by Title VII of the Civil Rights Act of 1964.***

Mandatory Vaccinations Do Not Violate the U.S. Constitution.

Governmental employers often face significant restrictions that private employers do not face, because governmental employers are directly subject to the requirements of the Constitution.



A decision from more than a century ago, however, indicates that mandatory vaccinations in a public health emergency do not violate the Constitution. That decision came in the 1905 case of *Jacobson v Massachusetts*, 197 U.S. 11. The U.S. Supreme Court upheld a Massachusetts law that permitted municipalities to order vaccination of all residents. That law, the Court held, did not violate the Fourteenth Amendment to the U.S. Constitution. The Court found that during a public health emergency, the government's police power allows it to restrain a citizen's rights in order to promote the common good, so long as the restraints are not imposed in an "arbitrary, unreasonable manner," and do not "go so far beyond what was reasonably required for the safety of the public." The *Jacobson* court did say that courts would be obliged to find an exception to a mandatory vaccination regulation for a person who had a condition that could result in serious injury to health or death from the vaccine—in modern words, a person with a medical contraindication. In the decades since, the courts have applied *Jacobson's* broad endorsement of the government's right to take measures to protect public health to a wide variety of situations. Recently, in the context of the COVID-19 pandemic, a few lower courts have found that *Jacobson's* rationale cannot be used to justify particular restraints on free speech and freedom of worship. But when it comes to vaccines, *Jacobson* is still good law.

Does It Matter That the COVID-19 Vaccines Have Only an EUA and Not a Regular Approval?

The vaccinations available at the time of this writing are being administered under an Emergency Use Authorization (EUA) from the federal Food and Drug Administration. There is nothing to suggest that this fact changes the analysis that a government and therefore, a government employer, may require vaccination against COVID-19. The section of the federal Food, Drug and Cosmetic Act that governs the issuance of an EUA [21 U.S.C. § 360bbb-3(e)(A)(ii)(III)] says that any person who is going to take the vaccine must be told that they have the option to accept or refuse the vaccine and the consequences, if any, of refusing. They must also be told of any alternatives to the vaccine that are available and of their benefits and risks.

In other words, no employer, health care provider or pharmacist can take another person by physical force and vaccinate them. The person must be willing to receive the vaccine. But that doesn't prohibit an employer from requiring vaccination against COVID-19 as a condition of employment. It doesn't prevent discipline or even discharge as a consequence of refusing to be vaccinated against COVID-19.

What Does the EEOC Say About Mandatory COVID-19 Vaccinations?

Most employers, public and private, are subject to the Americans With Disabilities Act and to Title VII of the Civil Rights Act of 1964. Those statutes, in their prohibitions against discrimination, may affect an employer's ability to require that a particular employee submit to a COVID-19 vaccination.

The federal Equal Employment Opportunity Commission (EEOC) administers the ADA and Title VII. It recently updated its online guidance *What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws* to add a new section (Section K) about vaccination. This is an excellent and comprehensive discussion of how employee vaccination requirements interact with anti-discrimination laws. It should be consulted by employers looking for a detailed discussion. In brief, here's what the EEOC has to say about mandatory employee vaccination against COVID-19:

- First, while the ADA and Title VII continue to apply during the COVID-19 pandemic, they do not interfere with or prevent employers from following the guidelines and suggestions made by the Centers for Disease Control and Prevention (CDC) and state and local public health authorities about steps employers should take regarding the spread of this disease. The EEOC has updated its comprehensive publication *Pandemic Preparedness in the Workplace and the Americans With Disabilities Act* to include discussion of COVID-19.
- A vaccination is not a medical examination. Thus, it is not subject to the ADA's regulation of medical examinations of employees.
- According to the CDC, health care providers should ask certain questions before administering a vaccine to ensure that there is no medical reason that would prevent the person from receiving the vaccination. *But pre-vaccination medical screening questions are likely to elicit information about a disability and therefore could fall under the ADA's regulation of medical examinations of employees.* As the next two bullet points show, how the vaccination is administered may determine how the ADA applies to the pre-vaccination screening.



- In the first situation, the pre-vaccination questions are simply not subject to the ADA's regulation of medical inquiries. When an employee is vaccinated by an independent entity that is not acting on the employer's behalf, such as the employee's personal physician, an independent medical clinic, a retail pharmacist, or a local health department that is not sharing information with the employer, pre-vaccination screening questions are *not* disability-related inquiries restricted by the ADA. *This would be true even where the employer has required the employee to receive a COVID-19 vaccine.*
 - In the other situation, however, pre-vaccination medical questions *are* subject to the ADA's medical-inquiry regulations, but are unlikely to violate them. When the pre-vaccination questions are asked by the employer or by a third-party contractor brought in to administer vaccinations on the employer's behalf, they do fall under the ADA. For such questions to be lawful, the employer must show that these inquiries are "job-related and consistent with business necessity." In the case of vaccination against COVID-19, to show that the pre-vaccination screening is job-related and consistent with business necessity, an employer would have to have a reasonable belief that employees who did not answer the questions and, therefore, did not receive a vaccination, would pose a direct threat to the health or safety of themselves or others. **The EEOC has expressly recognized that COVID-19 satisfies the direct threat standard.** See *Pandemic Preparedness in the Workplace*, under Part II (Relevant ADA Requirements and Standards), Section B (Direct Threat). So, even when the employer is administering the vaccination itself (or directing its administration) and asking pre-vaccination questions, there is no violation of the ADA.
- **An employer may require proof that an employee has received a COVID-19 vaccination.** This is not a disability-related inquiry because there are many reasons why an employee may not have been vaccinated, which may or may not be disability-related.
 - The ADA requires employers to keep any employee medical information obtained in the course of the vaccination program confidential.
 - Under the ADA, an employer must accommodate an employee who has a medical condition that makes it inadvisable for that employee to receive a COVID-19 vaccine unless accommodating the employees poses an undue hardship on the employer.
 - Under Title VII, an employer must accommodate an employee whose sincerely held religious beliefs are incompatible with COVID-19 vaccination.

Medical Exemptions from a Mandatory Vaccination Requirement

An employee may have a disability that prevents him or her from taking a vaccine generally, or a particular vaccine such as a COVID-19 vaccine (because, for example, they are allergic to an ingredient used in the making of the vaccine). The employer must make a reasonable accommodation for that employee. This is an ADA requirement, but it is also a constitutional requirement under *Jacobson v. Massachusetts*, discussed above. Such an accommodation may result in the employee being exempt from the vaccination requirement and it may not.

As with all requests for accommodation because of a disability, an employer is entitled to documentation from the employee's health care provider about the nature of the medical condition and how the condition makes it unsafe for the employee to receive any or all of the COVID-19 vaccines.



Employers must, as with all situations of reasonable accommodation, engage in an interactive process with employees whose medical condition makes them unable to take the vaccine to try to find a suitable accommodation. The EEOC has said that it generally considers exemption from a vaccine requirement to be a reasonable accommodation in such cases. But as with all ADA accommodations, an employer is not required to accommodate an employee's disability where to do so would cause an undue hardship. What is an undue hardship in the COVID-19 context? As with all matters involving the ADA, every situation must be evaluated on its own merits, even in the context of COVID-19. Here, one of the most important considerations will be whether the individual employee will pose a direct threat if they remain in the workplace without being vaccinated. In other words, will this employee expose co-workers or the public to the COVID-19 virus? Given the nature of local government employment, the answer to this question will often be "yes."

In some cases, however, an employer will be able to accommodate an employee who cannot be vaccinated by allowing the employee to work remotely for the duration of the pandemic emergency. But not all work can be done remotely. Some jobs involve working out in the community. Others involve providing direct, in-person service to the public from the local government employer's offices. Some jobs require in-person collaboration with others. See 29 CFR § 1630.2(p).

For employees whose work cannot be performed remotely and whose presence at work could expose others to the virus, *an employer may prohibit that employee from continuing to work*. As noted above, the EEOC has said that COVID-19 may be considered a direct threat to others in the workplace or to members of the public who interact with the employer's workforce. In such a situation, an employer may exclude that person from the workplace. The employer might put the employee on an indefinite, unpaid leave (or allow the employee to use any accrued paid leave or accrued comp time). But it is possible that the employer will find that the only alternative is termination of employment.

Religious Exemptions from a Mandatory Vaccination Requirement

An employee may have a sincerely held religious belief, practice, or observance that forbids taking a COVID-19 vaccination. Once an employer gets notice of this situation, the employer must, as under the ADA, provide a reasonable accommodation unless it would pose an undue hardship. But it is easier for an employer to meet the test for undue hardship under Title VII than under the ADA. Nonetheless, an employer will likely want to apply the same analysis to an employee's request for a religious accommodation from a COVID-19 vaccination requirement as it does for requests for an ADA accommodation.

For a more detailed discussion of exemption from vaccination as a reasonable accommodation of a religious belief under Title VII, see my publication, *Are You Prepared? Legal Issues Facing North Carolina Public Employers in Disasters and Other Emergencies*.

What Does OSHA Say About Mandatory COVID-19 Vaccinations?

To date, neither the federal Occupational Safety and Health Administration (OSHA) nor the Occupational Safety and Health Division of the North Carolina Department of Labor (NC OSH) have issued any formal or informal guidance or opinions that specifically address COVID-19 vaccination (NC OSH has an enforcement agreement with OSHA and generally adopts OSHA's standards and guidance). OSHA has addressed the question of whether an employer may require vaccination against seasonal flu, however. In a 2009 opinion letter posted on the OSHA website, the acting assistant secretary of labor said,

... {A}lthough OSHA does not specifically require employees to take the vaccines, an employer may do so. In that case, an employee who refuses vaccination because of a reasonable belief that he or she has a medical condition that creates a real danger of serious illness or death (such as serious reaction to the vaccine) may be protected under Section 11(c) of the Occupational Safety and Health Act of 1970 pertaining to whistle blower rights.

So it seems reasonable to conclude that OSHA, like the EEOC, will allow employers to require COVID-19 vaccination provided that it makes an exception in the case of those employees for whom this vaccine is contraindicated for medical reasons.

What If an Employee Refuses But Has No Medical or Religious Excuse?



Employees who refuse to take a mandatory vaccination without medical documentation and without pointing to a sincerely held religious belief may be disciplined or terminated from employment. Perhaps the employee simply does not wish to be vaccinated, or thinks vaccinations bring on other illnesses, or does not trust the federal government or the CDC. In these circumstances, the employee does not have a legal basis for refusing. Refusal to be vaccinated is a form of failure to abide by the terms and conditions of employment and of insubordination. Employers must, of course, follow any procedures set forth in their personnel policies in administering any discipline or in terminating employment.

Another Consideration in Deciding Whether to Require COVID-19 Vaccination: Distribution of the Vaccine

COVID-19 vaccinations will not be immediately available to all takers. The North Carolina Department of Health and Human Services (NC DHHS) has considered the recommendations of the CDC's Advisory Committee on Immunization Practices and the North Carolina Vaccine Advisory Committee and has devised a vaccine distribution plan (the "NC Plan"). The NC Plan calls for the vaccine to be distributed in phases based on a combination of high risk of exposure to the virus and high risk of severe illness from the virus. This means that employers who require their employees to receive the COVID-19 vaccination will not be able to have all their employees vaccinated at the same time. You can see a representation of the NC Plan on the second page of NC DHHS's vaccine flyer [here](#).

The NC Plan aligns closely with the CDC's recommendations about the priority different groups should be given. It calls for approximately 140,000 – 161,000 people to be vaccinated during the first phase, known as Phase 1A. Persons vaccinated during Phase 1A will be limited to health care workers and COVID responders at high risk for exposure based on work duties or who are vital to the initial COVID vaccine response. As of the date of publication, this includes those who care for COVID-19 patients, as well as those providing cleaning services in areas where COVID-19 patients are treated; EMTs and paramedics; health care workers performing intubations or CPR; those administering intranasal COVID-tests; and those administering the COVID-19 vaccine. See the NC DHHS Fact Sheet, *Deeper Dive: Phase 1A*. This list clearly includes a number of local government positions both in public safety departments and in local health departments, including those providing janitorial services in a health department clinical areas.

Some, but not all of the NC Plan's phases are further divided into priority groups. Phase 1B, for example, is further divided into three groups. Phase 1B Group 1, therefore, will be eligible for vaccination before those in Phase 1B Groups 2 and 3. Here are the Phase 1B Groups as set forth in the NC DHHS Fact Sheet, *Deeper Dive: Phase 1B*:

Phase 1B, Group 1: Anyone 75 years of age and older. There is no requirement that a person have conditions that make them more at risk for complications from COVID-19.

Phase 1B, Group 2: Any health care workers not vaccinated in Phase 1A who provide direct patient care or who work in areas where in-person patient care occurs, as well as essential front line workers and over age 50. There is no requirement that a person have conditions that make them more at risk for complications from COVID-19.

Phase 1B, Group 3: All other health care workers providing direct patient care who were not vaccinated in Phase 1A and front line essential workers of any age. Again, there is no requirement that a person have conditions that make them more at risk for complications from COVID-19.

Of the groups eligible for vaccination during **Phase 1B**, those most relevant to public employers include those providing behavioral health services, community health workers, dentists and dental hygienists in public health clinics, environmental services staff, home health workers, laboratory and phlebotomy staff, pharmacists, respiratory techs, front-office administrative staff of health clinics, and emergency management employees, as well as doctors, nurses, nursing aides and assistants and EMTs and paramedics who have not been vaccinated in Phase 1A.

Public employee essential workers who are eligible to be vaccinated in **Phase 1B, Groups 2 and 3** include firefighters and law enforcement officers, educators and support staff, day care employees, jail and corrections staff and public transit employees.

Phase 2 will expand the pool of those eligible for vaccination to include all adults at high risk of exposure and at increased risk of severe illness from COVID-19. Phase 2 includes 4 sub-groups. They are, in order of priority,:



Phase 2, Group 1: Anyone 65-74 years old, regardless of health status.

Phase 2, Group 2: Anyone 16-64 years old with high-risk medical conditions such as cancer, chronic kidney disease, COPD, being immunosuppressed from an organ transplant, obesity, serious heart condition, sickle cell disease and type 2 diabetes, among others.

Phase 2, Group 3: Anyone who is incarcerated or living in other close group living settings who is not already vaccinated due to age, medical condition or job function.

Phase 2, Group 4: Other essential workers not yet vaccinated. This group includes employees in water and wastewater systems, information technology, public works and traffic engineers and public health workers not vaccinated earlier.

As of yet, NC DHHS has yet to issue Deeper Dive Fact Sheets for Phase 2.

In **Phase 3**, college and university students and K-12 students over the age of 16 will be eligible for vaccination.

Phase 4 covers everyone else.

This is *not* a complete and exhaustive list of those eligible for priority vaccination, but only highlights those categories most relevant for public employers and employees.

As NC DHHS issues more guidance, it should become relatively easy for public employers to identify those employees whose job duties qualify for vaccination during Phases 1A, 1B and 2. Only those in Phase 2, Group 2 have their eligibility for vaccination conditioned on the existence of a chronic medical condition – Phase 2, Group 2 is anyone ages 16-64 with medical conditions that put them at high risk for severe COVID-19 disease. *Asking employees who have those chronic conditions identified by the CDC as qualifying them for priority vaccination to identify themselves is allowed under the ADA because the EEOC has identified COVID-19 as pandemic and COVID-19 in the workplace as a direct threat, as discussed above.*

Conclusion

Recent surveys indicate that perhaps 40% of the population is unlikely to take a COVID-19 vaccine. Employers may, therefore, face significant resistance to a COVID-19 vaccine requirement. Nonetheless, mandatory vaccination is lawful, with the limitations discussed above.

Public employers should ask their local health departments for material and assistance in educating their workforces about the safety and efficacy of the different COVID vaccines to overcome any hesitation that may be based on misinformation. The North Carolina Department of Health and Human Services has prepared material that health departments and employers may use to encourage people to get vaccinated. Here are some of them:

- Fact Sheet – COVID-19 Vaccine Update (December 14, 2020)
- Flyer – COVID-19 Vaccines: Your best shot against COVID-19
- Infographic – Vaccine Development Process
- Infographic – Vaccination Rollout Plan
- Link – Frequently Asked Questions
- Presentation – COVID-19 Vaccination Overview
- Videos on Vaccine Rollout
 - NCDHHS Secretary Mandy Cohen shares information on the COVID-19 vaccine rollout plan (45-second, 30-second)
 - NCDHHS Deputy Secretary Ben Money shares information on the COVID-19 vaccine rollout plan (link)

DHHS will continue to update its vaccines page – <https://covid19.ncdhhs.gov/vaccines> — with new material. So check back there frequently.



Links

- www.fda.gov/vaccines-blood-biologics/vaccines/emergency-use-authorization-vaccines-explained
- www.fda.gov/consumers/consumer-updates/understanding-regulatory-terminology-potential-preventions-and-treatments-covid-19
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- supreme.justia.com/cases/federal/us/197/11/#tab-opinion-1921099
- www.law.cornell.edu/uscode/text/21/360bbb-3
- www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=
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