

DECLARATION OF BRITTANY VANLANDINGHAM, ADMINISTRATOR
MONROE CITY MANOR CARE CENTER

I, BRITTANY VANLANDINGHAM, being first duly sworn upon my oath, do hereby state as follows:

1. I am the Administrator of the Monroe City Manor Care Center (MCMCC) location at 1010 highway 24/36 East, Monroe City, Missouri. I am also a resident of Missouri and over the age of majority. I have personal knowledge of the facts in this declaration, and those facts are true and correct to the best of my knowledge.

2. MCMCC is a 60 Bed, for-profit nursing home in Monroe City, Missouri and has been in operation since 1977. MCMCC provides a wide variety of services including skilled nursing, physical therapy, occupational therapy, speech therapy, and custodial nursing care.

3. MCMCC employs no less than 60 employees, including no less than 20 nurses, 20 certified nurse aides, 10 kitchen staff, and 10 other staff members.

4. Each year, MCMCC provides services to approximately 90 patients whose care is paid for by the federal government's Centers for Medicare and Medicaid Services agency (CMS). CMS provides reimbursement to MCMCC for treatment of these patients through the federal Medicare and Medicaid programs. In 2020, MCMCC treated and billed CMS for the treatment of approximately 75 patients. MCMCC received approximately \$2,000,000 in reimbursement from CMS in 2020.

5. Most if not all employees of MCMCC receive at least a portion of their

salaries from funds provided by the reimbursement of federal funds from CMS.

6. Due to media reports, I have become aware that CMS will require all employees of MCMCC to be fully vaccinated for COVID-19 no later than January 4, 2022. This information, which has been widely disseminated, indicates that providers who refuse to require vaccinations for all employees will no longer be eligible for CMS reimbursement or to participate in the CMS program.

7. There are a number of MCMCC employees who are refusing to be vaccinated for COVID-19. The vaccination rate of MCMCC employees is under 50%. When surveyed, a majority of these unvaccinated staff stated they would choose to leave healthcare completely over being forced to get the covid-19 vaccine. I believe that many additional employees will voluntarily quit working for MCMCC or I will be forced to terminate their employment at MCMCC on or before January 4, 2022 if the CMS mandate is ultimately imposed.

8. The loss of such additional employees will cause significant difficulty in the continued operation of MCMCC.

9. The recruitment of qualified employees is a significant consideration at MCMCC. I anticipate that the federal CMS vaccine mandate will limit the number of potential qualified applicants and as such will interfere with my ability to hire and maintain enough staff to effectively operate MCMCC. In addition, due to a shortage of qualified staff (particularly nursing staff), the market rates to hire new staff have skyrocketed. The approximate current hourly rate for a CNA at MCMCC is \$13, an LPN is \$21 and an RN is \$26. The rates for these same staff

positions in late 2020 was \$11, \$18 and \$22 respectively.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 10th day of November, 2021.

B. Vanlandingham RN LNHA

Brittany Vanlandingham, Administrator
Monroe City Manor Care Center