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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

December 14, 2022

Vonda Willey
Blue Water Developmental Housing, Inc.
1600 Gratiot, Ste 1
Marysville, MI 48040

RE: License #: AS500401828
Investigation #: 2023A0604001
Pound Road

Dear Ms. Willey:

Attached is the Special Investigation Report for the above referenced facility. Due to the violations identified in the report, a written corrective action plan is required. The corrective action plan is due 15 days from the date of this letter and must include the following:

- How compliance with each rule will be achieved.
- Who is directly responsible for implementing the corrective action for each violation.
- Specific time frames for each violation as to when the correction will be completed or implemented.
- How continuing compliance will be maintained once compliance is achieved.
- The signature of the responsible party and a date.

If you desire technical assistance in addressing these issues, please feel free to contact me. In any event, the corrective action plan is due within 15 days. Failure to submit an acceptable corrective action plan will result in disciplinary action.

Please review the enclosed documentation for accuracy and contact me with any questions. In the event that I am not available and you need to speak to someone immediately, please contact the local office at (248) 975-5053.

Sincerely,

A handwritten signature in cursive script that reads "Kristine Cilluffo".

Kristine Cilluffo, Licensing Consultant
Bureau of Community and Health Systems
4th Floor, Suite 4B
51111 Woodward Avenue
Pontiac, MI 48342
(248) 285-1703

enclosure

**MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF COMMUNITY AND HEALTH SYSTEMS
SPECIAL INVESTIGATION REPORT**

I. IDENTIFYING INFORMATION

License #:	AS500401828
Investigation #:	2023A0604001
Complaint Receipt Date:	10/03/2022
Investigation Initiation Date:	10/04/2022
Report Due Date:	12/02/2022
Licensee Name:	Blue Water Developmental Housing, Inc.
Licensee Address:	Ste 1 1600 Gratiot Marysville, MI 48040
Licensee Telephone #:	(810) 388-1200
Administrator:	Vonda Willey
Licensee Designee:	Vonda Willey
Name of Facility:	Pound Road
Facility Address:	36442 Pound Road Richmond, MI 48062
Facility Telephone #:	(586) 727-4737
Original Issuance Date:	01/27/2021
License Status:	REGULAR
Effective Date:	07/27/2021
Expiration Date:	07/26/2023
Capacity:	6
Program Type:	DEVELOPMENTALLY DISABLED

II. ALLEGATION(S)

	Violation Established?
<ul style="list-style-type: none"> • Untrained staff are working alone. • The facility is understaffed. Some staff are staying over 20 hours due to lack of coverage. 	Yes

III. METHODOLOGY

10/03/2022	Special Investigation Intake 2023A0604001
10/03/2022	APS Referral Complaint indicates that Adult Protective Services (APS) referral was denied.
10/04/2022	Special Investigation Initiated - On Site Completed unannounced onsite investigation. Interviewed Assistant Manager, Taylor Rapley. Received copy of staff schedule and staff list.
10/05/2022	Contact - Document Received Email from Complainant with documents/emails detailing concerns. Sent return email.
10/07/2022	Contact - Document Received Email from Complainant. Sent return email.
10/07/2022	Contact - Telephone call made TC to Complainant
10/07/2022	Contact - Document Sent Email to Vonda Willey requesting staff training records
10/07/2022	Contact - Telephone call received Received message from Vonda Willey
10/10/2022	Contact - Telephone call made Left message for Vonda Willey.
10/10/2022	Contact - Document Received Received staff training records by email from Vonda Willey

10/11/2022	Contact- Document Sent Email to and from Andrea Bubel
10/11/2022	Contact- Telephone call made TC to Vonda Willey
10/11/2022	Contact- Document Sent Email to Rebecca Walny, Macomb County Recipient Rights Specialist. Received return email.
10/25/2022	Contact- Document Received Email from Complainant. Sent return email.
11/03/2022	Contact - Telephone call received TC from Marissa Lee, Blue Water Developmental Housing Human Resorces
12/06/2022	Contact- Document Sent Email to Rebecca Walny, Recipient Rights Specialist. Received return email. Recipient Rights investigation is still pending.
12/08/2022	Contact- Document Sent Email to Vonda Willey requesting any additional training records obtained
12/09/2022	Contact- Document Received Received additional training records from Andrea Bubel by email.
12/09/2022	Exit Conference TC to Licensee Designee, Vonda Willey. Left message with findings.
12/12/2022	Contact- Document Sent Email to and from Andrea Bubel re: date of hire

ALLEGATION:

- **Untrained staff are working alone.**
- **The facility is understaffed. Some staff are staying over 20 hours due to lack of coverage.**

On 10/03/2022, I received a complaint regarding the Pound Road home. The complaint alleged that there are five adults that live at Pound Group Home. There are residents that are medically fragile, and they all have court appointed guardians. The facility is understaffed had some staff are staying over 20 hours due to lack of coverage. It is

unknown if there are any unmet needs. The residential supervisor and executive director have been notified and are aware of staff shortages. One of the staff worked over night and was given a plan by the residential supervisor to stay at the facility and sleep. The executive director was informed of the plan and was onboard with it. One of the resident's suffered a seizure and is now at the hospital at Port Huron McLaren. On 10/04/2022, an incident report was provided to licensing indicating Resident A had a seizure and was admitted to hospital. Resident was admitted to hospital due to low sodium.

On 09/29/2022, I received an incident report by email from Division Director, Andrea Bubel. The incident report was signed on 09/29/2022 and date of the incident was 08/27/2022. The report indicated, "Heidi Macchi scheduled Jaida Dorris (untrained) and Neveah Jurn (untrained) to work together on 08/27/2022 from 3 pm-11 pm. Jaida was a no-call no-show, Neveah was left alone on shift from 5 pm until 11 pm. Taylor Rapley passed medications at 5 pm prior to leaving and passed 8 pm meds at 11 pm when she returned. Neveah reported to another employee of another home that she was left alone. The other employee reported it to their supervisor who reported it to Administration. HR opened an administrative review". The corrective measures indicated that employee performance records were given following their company's disciplinary guidelines. On 09/29/2022, I sent an email to Andrea Bubel regarding incident. Ms. Bubel stated that Ms. Macchi was receiving a three-day suspension in a disciplinary meeting scheduled for the following day.

I completed an unannounced onsite investigation at the home on 10/04/2022. I interviewed Assistant Manager, Taylor Rapley. Ms. Rapley stated that they typically have two staff per shift. There are five residents and six staff who work at the home. Ms. Rapley stated that they do not have enough staff. Ms. Rapley stated that the Home Manager, Heidi Macchi, was recently suspended because an untrained staff was scheduled alone. Ms. Rapley stated that she passed medications for the staff during their shift. Ms. Rapley stated that this was a common practice and had been approved by management. Untrained staff would work alone and have trained staff come in to pass medications. Ms. Rapley stated that Ms. Macchi is the only supervisor who has been suspended for this practice. Ms. Rapley also indicated that staff have had to work extremely long shifts due to lack of coverage.

On 10/07/2022, I interviewed the Complainant by phone. The Complainant stated that staff that are not fully trained, are being put on shifts. Management has allowed for untrained staff to work alone and trained staff to come in and pass medications during the shift. Complainant stated that staff have had to work up to 24-hour shifts. A staff was recently left on shift for approximately 22 hours and then told to sleep at the home once another staff got there. Complainant believes that staff at Pound Road are being unfairly targeted by management. It is believed that Division Director, Andrea Bubel, is treating staff unfairly due to personal issues. On 10/05/2022, the Complainant provided emails detailing personal issues and reporting of incidents. I informed Complainant during interview that some of their concerns regarding staffing and treatment of employees

would need to be referred to Wage and Hour and/or Human Resources as they were not related to licensing rules.

On 10/11/2022, I interviewed Licensee Designee, Vonda Willey, by phone. Ms. Willey stated that Home Manager, Heidi Macchi, was suspended for scheduling a staff that was not fully trained. Ms. Willey believed that medications were passed 3-4 hours late once a trained staff came in to pass medications. Ms. Macchi received a 3-day suspension. Ms. Willey stated that they have critical staffing levels and was aware that a staff had to work a 20 plus hour shift. Recipient Rights is also investigating the concerns regarding Pound Road. Ms. Willey stated that management did not approve for untrained staff to work alone and have trained staff come in to pass medications.

On 10/07/2022, I sent email to Licensee Designee, Vonda Willey, requesting training records for the following Pound Road staff: Gayle Treat, Jeweliyah Ternes and Nevaeh Jurn. On 10/10/2022, I received training records by email from Vonda Willey. On 12/09/2022, I received additional training records by email from Andrea Bubel. Training records indicated that all three staff are now fully trained.

Ms. Jurn began her employment at Pound Road on 07/12/2022. Training records indicate that Neveah Jurn completed Specialized Residential Service Provider Training on 08/24/2022 which included medication and medication administration training. However, the certificate from Macomb County Community Mental Health indicates that the certificate is not validation of completing in-person health and medication demonstration. Incident report provided indicates that Ms. Jurn was untrained and scheduled to work alone on 08/27/2022. Ms. Jurn was considered untrained because she had not yet completed her medication demonstration training which was not completed until 10/19/2022. In addition, Ms. Jurn did not complete CPR/First Aid training until 09/08/2022 and Resident Rights training until 10/18/2022.

On 10/04/2022, I received a copy of the September 2022 and October 2022 staff schedules. The schedules indicate that staff were scheduled to work a variety of shifts including 7am- 3pm, 1 pm-11pm, 3 pm-7am, 9 am-2 pm, 3 pm-11 pm, 3 pm-7 am and 11 am- 7 pm. The initial shifts on schedule were no more than 16 hours and sufficient trained staff were scheduled. Untrained staff, Nevaeh Jurn, was scheduled along with another trained staff on the September 2022 schedule. There are notations on the schedule which show changes to hours and staff names crossed off which resulted in longer shifts for remaining staff. On 10/04/2022, Assistant Manager, Taylor Rapley, stated that staff, Gayle Treat, had to work several hours when Home Manager, Heidi Macchi, was suspended. The schedule indicates that on 09/30/2022 Gayle worked two shifts from 3 pm-11pm and then 11 pm-7 am. The schedule indicates she was then put on the schedule the next morning on 10/01/2022 to cover Heidi Machi's shift from 7 am- 3 pm for a total of 24 hours.

On 10/20/2022, I interviewed Division Director, Andrea Bubel at the Seneca Home during renewal inspection. Ms. Bubel stated that they have never allowed untrained staff to work alone and have trained staff come in to pass medications. Ms. Bubel confirmed

that residents at Pound Road are prescribed as needed medication and have standing medical orders for medications that may not be given on a set schedule. Home Managers, Patty McDonald and Rebecca Chartier were also present. Ms. McDonald and Ms. Chartier stated that they were not aware of an approved practice of untrained staff to work alone and have trained staff come in to pass medications.

On 11/03/2022, I received telephone call from Marissa Lee, Blue Water Developmental Housing, Human Resource Manager. Ms. Lee stated that she was investigating a concern that was brought to her attention regarding Division Director discussing staff in front of other employees at renewal inspection. Ms. Lee stated that she is new to Human Resources, and she believes that it may have been practice for untrained staff to work alone and have trained staff come in to pass medications. However, she stated that she is taking steps to correct issue and will write up staff if she is aware of it happening in the future.

I completed an exit conference with Licensee Designee, Vonda Willey on 12/09/2022. I left Ms. Willey a message and informed her of the violations found. I also informed her that a copy of the special investigation report would be mailed once approved and to contact me with any questions.

APPLICABLE RULE	
R 400.14204	Direct care staff; qualifications and training.
	(3) A licensee or administrator shall provide in-service training or make training available through other sources to direct care staff. Direct care staff shall be competent before performing assigned tasks, which shall include being competent in all of the following areas: (b) First aid. (c) Cardiopulmonary resuscitation. (e) Resident rights.
ANALYSIS:	An incident report was received indicating Nevaeh Jurn was not fully trained and worked alone at Pound Road on 8/27/2022. Ms. Jurn began working at the home on 07/12/2022. Manager, Heidi Machi, was suspended for three days due to the incident. Ms. Jurn did not complete First Aid/CPR training until 09/08/2022 and did not complete Resident Rights training until 10/18/2022.
CONCLUSION:	VIOLATION ESTABLISHED

APPLICABLE RULE	
R 400.14206	Staffing requirements.
	(2) A licensee shall have sufficient direct care staff on duty at all times for the supervision, personal care, and protection of residents and to provide the services specified in the resident's resident care agreement and assessment plan.
ANALYSIS:	<p>The home did not have sufficient direct care staff on duty for the supervision, personal care and protection of residents on 08/27/2022. An incident report was received indicating Nevaeh Jurn was not fully trained and worked alone at Pound Road on 08/27/2022. A trained staff came to pass medications during Ms. Jurn's shift, however, there was not a medication passer scheduled for the entire shift. Licensee Designee, Vonda Wiley stated that the home currently has critical staffing levels.</p> <p>The September 2022 and October 2022 schedules indicate that sufficient trained staff were scheduled to work. There are notations on the schedule which show changes to hours and staff names crossed off which resulted in longer shifts for remaining staff. The September 2022 schedule indicates that staff, Gayle Treat, worked for 24 hours straight between 09/30/2022-10/01/2022.</p> <p>The Complainant and Assistant Manager, Taylor Rapley indicated that management has allowed untrained staff to work alone and trained staff to come in and pass medications during the shift. Management, including Vonda Willey and Andrea Bubel, disagree that this was an approved practice. Human Resources Manager, Marissa Lee, stated that it may have been practice for untrained staff to work alone and have trained staff come in to pass medications. However, she stated that she is taking steps to correct issue and will write up staff if she is aware of it happening in the future.</p>
CONCLUSION:	VIOLATION ESTABLISHED

IV. RECOMMENDATION

Contingent upon receipt of an acceptable corrective action plan, I recommend no change in license status.

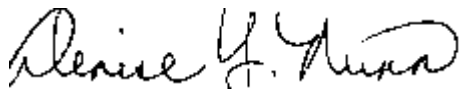


12/13/2022

Kristine Cilluffo
Licensing Consultant

Date

Approved By:



12/14/2022

Denise Y. Nunn
Area Manager

Date