



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

MARLON I. BROWN, DPA  
DIRECTOR

July 30, 2024

Karen LaFave  
Adult Learning Systems - UP, Inc  
Suite-4  
228 West Washington  
Marquette, MI 49855  
RE: License #: AS220405666  
Investigation #: 2024A0234012  
Riverview

Dear Ms. LaFave:

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.
- Indicate how continuing compliance will be maintained once compliance is achieved.
- Be signed and dated.

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 616-356-0100.

Sincerely,

Maria DeBacker, Licensing Consultant  
Bureau of Community and Health Systems CAMP Office  
223 Ridge Street  
Marquette, MI 49855  
(906) 280-8531

enclosure

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

**I. IDENTIFYING INFORMATION**

<b>License #:</b>	AS220405666
<b>Investigation #:</b>	2024A0234012
<b>Complaint Receipt Date:</b>	06/10/2024
<b>Investigation Initiation Date:</b>	06/10/2024
<b>Report Due Date:</b>	08/09/2024
<b>Licensee Name:</b>	Adult Learning Systems - UP, Inc
<b>Licensee Address:</b>	Suite-4 228 West Washington Marquette, MI 49855
<b>Licensee Telephone #:</b>	(906) 228-7370
<b>Licensee Designee:</b>	Karen LaFave
<b>Name of Facility:</b>	Riverview
<b>Facility Address:</b>	1336 Riverview Drive Kingsford, MI 49802
<b>Facility Telephone #:</b>	(906) 828-1518
<b>Original Issuance Date:</b>	01/11/2021
<b>License Status:</b>	REGULAR
<b>Effective Date:</b>	07/11/2023
<b>Expiration Date:</b>	07/10/2025
<b>Capacity:</b>	6
<b>Program Type:</b>	PHYSICALLY HANDICAPPED DEVELOPMENTALLY DISABLED MENTALLY ILL TRAUMATICALLY BRAIN INJURED

## II. ALLEGATION(S)

	Violation Established?
Facility was crushing medication and administered through peg tube when orders read to take by mouth.	Yes
Additional Findings	No

## III. METHODOLOGY

06/10/2024	Special Investigation Intake 2024A0234012
06/10/2024	Special Investigation Initiated - Telephone
06/10/2024	APS Referral
06/24/2024	Inspection Completed On-site
06/24/2024	Inspection Completed-BCAL Sub. Compliance
08/7/2024	Exit conference

### ALLEGATION:

**Facility was crushing medication and administered through peg tube when orders read to take by mouth.**

### INVESTIGATION:

On 6/24/24, I interviewed manager Angela Seibert during an unannounced investigation at the facility. Ms. Seibert stated that they had been administering medication via peg tube to Resident A because they thought the order-read they could. Ms. Seibert stated that the medication administration record (MAR) was written as "feed through peg tube." However, it was determined that the pharmacy and three employees at the home had the ability to update/change the MAR in the system, so it is unclear who entered the instructions. Ms. Seibert stated her assistant Amy Deagnar was updating orders and noticed that the order did not match the MAR. Ms. Deagnar reported the discrepancy to the prescribing physician and requested that the order be changed to administer through peg tube but the physician clarified to administer the medication orally. Ms. Seibert stated that since the physician's clarification the medication has been passed by mouth as prescribed.

On 6/24/24, I interviewed employee Amy Deagnar at the facility. Ms. Deagnar stated while updating orders and matching them to the MAR's she noticed that the order did not match the MAR's of previous months. Ms. Deagnar stated that she called the prescribing physician and requested that the order be changed to administer through peg tube. At that time, she reported that they had been administering incorrectly. Ms. Deagnar stated she was sure at one time they had an order saying to administer through peg tube but could not find the order. Ms. Deagnar stated that she would find the order and email it.

On 6/28/24, Amy Degenar emailed all orders for the previous year for Resident A. Although there was an order that read Resident A could have medications administered through the peg tube the letter was not written by the prescribing doctor but was written by Resident A's primary care physician. This physician ordered several of Resident A's prescriptions but stated in her orders that she does not oversee this prescription. The prescribing physician orders all stated, "take by mouth".

<b>APPLICABLE RULE</b>	
<b>R 400.14312</b>	<b>Resident medications.</b>
	<b>(1) Prescription medication, including dietary supplements, or individual special medical procedures shall be given, taken, or applied only as prescribed by a licensed physician or dentist. Prescription medication shall be kept in the original pharmacy-supplied container, which shall be labeled for the specified resident in accordance with the requirements of Act No. 368 of the Public Acts of 1978, as amended, being S333.1101 et seq. of the Michigan Compiled Laws, kept with the equipment to administer it in a locked cabinet or drawer, and refrigerated if required.</b>
<b>ANALYSIS:</b>	The facility admits they have been crushing medication and administering in the peg tube. Orders state take by mouth.
<b>CONCLUSION:</b>	<b>VIOLATION NOT ESTABLISHED</b>

On 8/7/24 an exit email was sent to licensee Karen Lafave. Ms. Lafave is aware of the findings of this report.

#### **IV. RECOMMENDATION**

Upon receipt of an adequate corrective action plan no changes are recommended to this license.

*Maria Debacker*

7/30/24

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Maria Debacker  
Licensing Consultant

Date

Approved By:

*Russell Misiak*

8/7/24

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Russell B. Misiak  
Area Manager

Date