



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

ORLENE HAWKS  
DIRECTOR

March 29, 2019

Deborah Russell  
3250 N. Banner Rd.  
Sandusky, MI 48471

RE: License #: AS760393809  
Investigation #: **2019A0871015**  
**A Place Of Grace**

Dear Ms. Russell:

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 (989) 732-8062.

Sincerely,



Kathryn A. Huber, Licensing Consultant  
Bureau of Community and Health Systems  
411 Genesee  
P.O. Box 5070  
Saginaw, MI 48605  
(989) 293-3234

enclosure

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

**I. IDENTIFYING INFORMATION**

<b>License #:</b>	AS760393809
<b>Investigation #:</b>	2019A0871015
<b>Complaint Receipt Date:</b>	02/04/2019
<b>Investigation Initiation Date:</b>	02/07/2019
<b>Report Due Date:</b>	04/05/2019
<b>Licensee Name:</b>	Deborah Russell
<b>Licensee Address:</b>	110 N. Elk Street Sandusky, MI 48471
<b>Licensee Telephone #:</b>	(810) 710-7076
<b>Administrator:</b>	Deborah Russell
<b>Licensee Designee:</b>	N/A
<b>Name of Facility:</b>	A Place Of Grace
<b>Facility Address:</b>	110 N. Elk Street Sandusky, MI 48471
<b>Facility Telephone #:</b>	(810) 648-4846
<b>Original Issuance Date:</b>	06/08/2018
<b>License Status:</b>	REGULAR
<b>Effective Date:</b>	12/08/2018
<b>Expiration Date:</b>	12/07/2020
<b>Capacity:</b>	6
<b>Program Type:</b>	AGED ALZHEIMERS

## II. ALLEGATION(S)

	<b>Violation Established?</b>
Licensee Deborah Russell A does not let the residents have private conversations.	Yes
Resident A was not allowed to continue with her current physician and was made to doctor with the Nurse Practitioner that comes to the facility.	Yes
Licensee Deborah Russell called Resident A “a mischievous manipulative person.”	No
Additional findings	Yes

## III. METHODOLOGY

02/04/2019	Special Investigation Intake 2019A0871015
02/07/2019	APS Referral
02/07/2019	Special Investigation Initiated - On Site Interviewed Licensee Deborah Russell, Resident A-B
02/07/2019	Contact - Document Received Received information form Adult Protective Service Worker Lane Smith
03/05/2019	Inspection Completed On-site Along with Adult Protective Service Worker Lane Smith, interviewed Resident A and reviewed records
03/21/2019	Inspection Completed-BCAL Sub. Compliance
03/27/2019	Exit Conference Face to face with Licensee Deborah Russell

**ALLEGATION:**

Licensee Deborah Russell A does not let the residents have private conversations.

**INVESTIGATION:**

On February 7, 2019, Adult Protective Service Worker Lane Smith and I conducted an unannounced onsite investigation and interviewed Licensee Deborah Russell. Licensee Russell denied that she listens to residents' private conversations.

Mr. Smith and I then told Ms. Russell we needed to speak with Resident A. Licensee Russell wheeled Resident to the back room where we were sitting where we could interview her. Licensee Russell stood by the doorway and we advised her that we needed to speak with Resident A in private. We then interviewed Resident A. Resident A said, "there are no private conversations" and Licensee Russell listens to their conversations.

Mr. Smith and I then interviewed Resident B. Resident said, "Debbie doesn't listen in on conversations but comes in with me when I see the doctor."

<b>APPLICABLE RULE</b>	
<b>R 400.14304</b>	<b>Resident rights; licensee responsibilities.</b>
	<b>(1) Upon a resident's admission to the home, a licensee shall inform a resident or the resident's designated representative of, explain to the resident or the resident's designated representative, and provide to the resident or the resident's designated representative, a copy of all of the following resident rights: (g) The right to associate and have private communications and consultations with his or her physician, attorney, or any other person of his or her choice.</b>
<b>ANALYSIS:</b>	Resident A said she cannot have private conversations. Resident B said Licensee Deborah Russell comes into the examination room when she visits the doctor. I confirm violation of this rule.
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**ALLEGATION:**

Resident A was not allowed to continue with her current physician and was made to doctor with the Nurse Practitioner that comes to the facility.

**INVESTIGATION:**

On February 7, 2019, Licensee Deborah Russell indicated that Resident A signed documents that allowed the Physician Assistant that comes to the facility to provide her care. She also said Resident A would no longer be able to doctor with her previous physician. Licensee Russell said “[Resident A] signed all paperwork to get information from (her previous doctor).” Licensee Russell indicated that Resident A was addicted to Norco and her previous doctor would call in prescriptions for her without examining her.

Licensee Deborah Russell showed Mr. Smith and I a copy of an ‘Authorization To Release Medical Information’ that was signed and dated by Resident A on January 14, 2019. The document was created by ‘Northview Medical House Calls.’ The document indicates ‘You are affiliated with Northview Medical House Calls and its member organizations and so authorized to request medical information on behalf of the patient for further treatment. NOTE: Healthcare providers may request medical information from another provider for further treatment as codified at 45 CFR 164.506(b)(2) and (c)(2) of the HIPPA Privacy Rule.’

On February 7, 2019, Resident A indicated she is her own guardian. Resident A said she and her husband moved in on the same day. Resident A indicated she fell and broke her right elbow and came here. Resident A said she “was in a lot of pain.” Resident A was with her previous doctor four years. Resident A stated, “I didn’t realize what I had signed, and Debbie told me I was to have no correspondence with my previous doctor.” Resident A said the physician assistant that comes to the home took her off Norco. When the physician assistant came to examine Resident A, she told her that she was not in pain because “at that moment, I was not in pain.” Resident A said she ordered Tylenol and Hemp oil for pain.

On March 5, 2019, I conducted an unannounced onsite investigation and again interviewed Resident A. Resident A again said she did not realize what she was signing in regards to changing physicians. When Resident A signed that authorization, she “thought it was part of the process of moving in.” Resident A is working on going home and intends to move home on April 1. Resident A is “trying to get a new doctor.”

<b>APPLICABLE RULE</b>	
<b>R 400.14304</b>	<b>Resident rights; licensee responsibilities.</b>
	<b>(1) Upon a resident's admission to the home, a licensee shall inform a resident or the resident's designated representative of, explain to the resident or the resident's designated representative, and provide to the resident or</b>

	<p><b>the resident's designated representative, a copy of all of the following resident rights:</b></p> <p><b>(I) The right to employ the services of a physician, psychiatrist, or dentist of his or her choice for obtaining medical, psychiatric, or dental services.</b></p>
<b>ANALYSIS:</b>	<p>Ms. Russell stated that Resident A signed a statement changing her medical care provider and would no longer be able to employ her physician of choice. Resident A did not realize what she signed and wanted to keep her previous doctor. I confirm violation of this rule.</p>
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**ALLEGATION:**

Licensee Deborah Russell called Resident A “a mischievous manipulative person.”

**INVESTIGATION:**

On February 7, 2019, Licensee Deborah Russell denied calling Resident A a name and would not provide any further information.

When Mr. Smith and I interviewed Resident A, she said Licensee Russell said she was “manipulative and controlling.” Resident A said she called her that because she contacted her previous doctor. Resident A said, “she gets pissy, slams doors.”

Mr. Smith and I then interviewed Resident B. Resident B has not heard Licensee Russell call anyone a name and has never called her a name. Resident B did say “she gets kind of loud” and “she is kind of moody.” Resident B indicated she has never heard Licensee Russell say anything bad to anybody but “I stay in my room a lot” and does not hear much.

On March 27, 2019, I conducted an unannounced onsite investigation and again interviewed Resident A. Resident A was persistent that Licensee Russell “called me manipulative and controlling.” Resident A said things are getting better in the facility and Licensee Russell has been nicer lately.

I also interviewed Licensee Deborah Russell. Licensee Russell said, “I don’t recall saying anything like that to [Resident A].” Licensee Russell indicated Resident A’s family is no longer coming to visit Resident A.

<b>APPLICABLE RULE</b>	
<b>R 400.14304</b>	<b>Resident rights; licensee responsibilities.</b>
	<p><b>(1) Upon a resident's admission to the home, a licensee shall inform a resident or the resident's designated representative of, explain to the resident or the resident's designated representative, and provide to the resident or the resident's designated representative, a copy of all of the following resident rights:</b></p> <p style="padding-left: 40px;"><b>(o) The right to be treated with consideration and respect, with due recognition of personal dignity, individuality, and the need for privacy.</b></p>
<b>ANALYSIS:</b>	<p>Resident A said Licensee Deborah Russell labeled her because she tried to contact her previous doctor. Resident A was interviewed a second time and confirmed her previous statement that Ms. Russell called her “manipulative and controlling.” Licensee Deborah Russell denies making inappropriate statements.</p> <p>Based on the information obtained during this investigation, there is not substantial evidence to confirm violation of this rule.</p>
<b>CONCLUSION:</b>	<b>VIOLATION NOT ESTABLISHED</b>

**ADDITIONAL FINDINGS:**

**INVESTIGATION:**

On February 7, 2019, I asked to observe Resident A’s *Health Care Appraisal*. A *Health Care Appraisal* was not available, and Licensee Russell said, “they refused to send it over.”

On February 26, 2019, I conducted an unannounced onsite investigation and asked to observe Resident B’s file. There was not a *Health Care Appraisal* available in her file.

On March 27, 2019, I asked Licensee Russell to provide me a copy with Resident A and Resident B’s *Health Care Appraisals*. Licensee Russell indicated they are at her home. I advised Licensee Russell to fax them to me but at the time of writing this report, I have not received them.

On December 7, 2018, I conducted an onsite renewal inspection and requested to observe Resident B’s *Health Care Appraisal*. Licensee Russell could not produce it. Renewal LSR dated 12/13/18, cited violation to Rule 400.14301(10), due to Resident



B's Health Care Appraisal not completed. On December 27, 2018, I received a corrective action plan that indicated the *Health Care Appraisals* would be completed in 30 days,

<b>APPLICABLE RULE</b>	
<b>R 400.14301</b>	<b>Resident admission criteria; resident assessment plan; emergency admission; resident care agreement; physician's instructions; health care appraisal.</b>
	(10) At the time of the resident's admission to the home, a licensee shall require that the resident or the resident's designated representative provide a written health care appraisal that is completed within the 90-day period before the resident's admission to the home. A written health care appraisal shall be completed at least annually. If a written health care appraisal is not available at the time of an emergency admission, a licensee shall require that the appraisal be obtained not later than 30 days after admission. A department health care appraisal form shall be used unless prior authorization for a substitute form has been granted, in writing, by the department.
<b>ANALYSIS:</b>	<i>A Health Care Appraisal</i> was not available for Resident A and Resident B. I confirm violation of this rule.
<b>CONCLUSION:</b>	<b>REPEAT VIOLATION ESTABLISHED RENEWAL LSR DATED 12/13/2018.</b>

On March 27, 2019, I conducted a face-to-face exit conference with Licensee Deborah Russell. Ms. Russell was informed of the findings of this investigation. Licensee Russell stated that she does not like the State coming into her home and feels like I am harassing the residents.

**IV. RECOMMENDATION**

Upon receipt of an acceptable correction plan, I recommend the status of this adult foster care group home remain unchanged (capacity 1-6).

*Kathryn Huber*

03/29/2019

Kathryn A. Huber  
Licensing Consultant

Date

Approved By:

*Mary Holton*

03/29/2019

Mary E Holton  
Area Manager

Date