



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

ORLENE HAWKS  
DIRECTOR

July 29, 2021

Michele Locricchio  
Anthology of Northville  
44600 Five Mile Rd  
Northville, MI 48168

RE: License #: AH820399661  
Investigation #: 2021A0784038  
Anthology of Northville

Dear Ms. Locricchio:

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 (810) 787-7031.

Sincerely,

A handwritten signature in cursive script that reads "Aaron L. Clum".

Aaron Clum, Licensing Staff  
Bureau of Community and Health Systems  
4809 Clio Road  
Flint, MI 48504  
(517) 230-2778

enclosure

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

**I. IDENTIFYING INFORMATION**

<b>License #:</b>	AH820399661
<b>Investigation #:</b>	2021A0784038
<b>Complaint Receipt Date:</b>	07/22/2021
<b>Investigation Initiation Date:</b>	07/23/2021
<b>Report Due Date:</b>	09/20/2021
<b>Licensee Name:</b>	CA Senior Northville Operator, LLC
<b>Licensee Address:</b>	44600 Five Mile Rd Northville, MI 48168
<b>Licensee Telephone #:</b>	(312) 994-1880
<b>Administrator:</b>	Jeffrey Madak
<b>Authorized Representative:</b>	Michele Locricchio
<b>Name of Facility:</b>	Anthology of Northville
<b>Facility Address:</b>	44600 Five Mile Rd Northville, MI 48168
<b>Facility Telephone #:</b>	(248) 697-2900
<b>Original Issuance Date:</b>	08/12/2020
<b>License Status:</b>	TEMPORARY
<b>Effective Date:</b>	08/12/2020
<b>Expiration Date:</b>	02/11/2021
<b>Capacity:</b>	103
<b>Program Type:</b>	AGED ALZHEIMERS

**II. ALLEGATION(S)**

	<b>Violation Established?</b>
Improper storing of medications	Yes
Improper disposal of medications	Yes
Additional Findings	No

**III. METHODOLOGY**

07/22/2021	Special Investigation Intake 2021A0784038
07/23/2021	Special Investigation Initiated - Telephone Attempted contact with complainant. Message left requesting a return call
07/23/2021	Contact - Telephone call received Interview conducted with complainant
07/26/2021	Inspection Completed On-site-BCAL Sub. Compliance
07/27/2021	Contact - Document Received Investigative documents received by email from administrator Jeff Madak
07/27/2021	Contact - Telephone call received Interview conducted with Northville Township officer MacArthur
07/29/2021	Exit Conference – Telephone Conducted with authorized representative Michele Locricchio

**ALLEGATION:**

**Improper storing of medications**

**INVESTIGATION:**

According to the complaint, several resident medications were found in a copy room of the facility.

On 7/23/21, I interviewed complainant by telephone. Complainant stated several resident narcotic medications were found, within the original bubble packs and unopened, in a cabinet of the copy room in the facility.

On 7/26/21, I interviewed administrator Jeffrey Madak at the facility.

Mr. Madak stated that he was made aware of the medications, as indicated in the complaint, which were found in the copy room of the facility. Mr. Madak stated the Northville police officer Dan MacArthur had been to the facility over this past weekend after being contacted about the medications. Mr. Madak stated he had been to the police station and spoke with officer MacArthur regarding the found medications, had provided a statement and was provided with a copy of the police report. Mr. Madak provided me with a copy of the police report and a printout of several pictures of various resident medications included with the report, most of medications in bubble packs with at least two medications in general medication vial containers. Due to the nature of the pictures, the information provided on the bubble packs and containers was not readable, however the police report provided the information from the medications in the pictures. Mr. Madak stated that according to the report, the medications were found by care associate Darnell, "Donny", Dickerson, in the copy room of the facility and turned over to the police.

Mr. Madak stated that several of the medications noted to have been found were narcotics. Mr. Madak stated he has no knowledge of who put the medications in the copy room or who should have destroyed them. Mr. Madak stated that according to officer MacArthur several of the medications were expired. Mr. Madak stated non-narcotic medications which are not fully used and discontinued for any reason are given back to the pharmacy. Mr. Madak stated that narcotic medications which are discontinued, and not fully used, are supposed to be counted by the nurse of the facility as well as a witness, which would be an administrative supervising staff or a med tech, with the amount noted on a "drug disposal" log and confirming signatures from both parties. Mr. Madak stated that once this is completed the medications are supposed to be placed inside of a liquid called "drug buster" which dissolves the medications. During the onsite, I observed a plastic jug of the drug buster liquid used for this process. Mr. Madak stated nurse Laura Kujawski is currently on "suspension" due to issues unrelated to this complaint and that it is the intention that she be terminated.

I reviewed the *MEDICATION DISPOSAL* policy provided by Mr. Madak which read consistently with statements he provided regarding the facilities methods for addressing unused and discontinued medications.

I reviewed the Northville Township Police Department (NTPD) provided by Mr. Madak which indicated medications for Residents A, B, C and D were turned over to officer MacArthur on 7/25/21 by Mr. Dickerson who reportedly found the medications in the copy room of the facility

<b>APPLICABLE RULE</b>	
<b>R 325.1932</b>	<b>Resident medications.</b>
	<b>(5) A home shall take reasonable precautions to ensure or assure that prescription medication is not used by a person other than the resident for whom the medication is prescribed.</b>
<b>ANALYSIS:</b>	The complaint alleged several resident medications were found improperly stored. The investigation confirmed that at least four resident medications were found within the copy room of the facility. Based on the findings the allegation is substantiated.
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**ALLEGATION:**

**Improper disposal of medications**

**INVESTIGATION:**

When interviewed, Complainant stated the resident medications found were supposed to be disposed of and were not. Complainant stated resident narcotic medications are disposed of when a resident moves out or discontinues use of the medications. Complainant stated the policy dictates that two people count the medications, sign a “med disposal sheet” and put the unused medications in a substance called “drug buster” which he state dissolves the medications. Complainant stated the facility nurse and a witness, who is supposed to be a medication technician (med tech) are responsible for conducting the medication disposal. Complainant reported not knowing who left the medications. Complainant stated the Northville Police Department has been notified and that the found narcotics will be turned into them.

When interviewed, Mr. Madak stated that several of the medications noted to have been found were narcotics. Mr. Madak stated he has no knowledge of who put the medications in the copy room or who should have destroyed them. Mr. Madak stated that according to officer MacArthur several of the medications were expired. Mr. Madak stated non-narcotic medications which are not fully used and discontinued for any reason are given back to the pharmacy. Mr. Madak stated that narcotic medications which are discontinued, and not fully used, are supposed to be counted by the nurse of the facility as well as a witness, which would be an administrative supervising staff or a med tech, with the amount noted on a “drug disposal” log and confirming signatures from both parties. Mr. Madak stated that once this is completed the medications are supposed to be placed inside of a

liquid called “drug buster” which dissolves the medications. Mr. Madak stated he did not see the actual packages of medications but was told by officer MacArthur that most of the medications were expired. During the onsite, I observed a plastic jug of the drug buster liquid used for this process. Mr. Madak stated nurse Laura Kujawski is currently on “suspension” due to issues unrelated to this complaint and that it is the intention that she be terminated.

According to the report, the medications provided to NTPD included Gabapentin for Resident A, Lorazepam, two prescriptions, for Resident B, Pregabalin for Resident C and Diphenoxylate atropine and Tramadol for Resident D.

I reviewed the DRUG DISPOSAL/RELEASE LOG provided by Mr. Madak. The log listed only three medications as having been disposed with one on 1/5/21, Lorazepam, and two on 1/21/21, Lorazepam and Morphine.

I reviewed documents titled *ORDER CHANGE REPORT* for Residents A, B, C and D provided by Mr. Madak which he indicated provides information related the discontinuation of medications for residents. A report for Resident A indicated the Gabapentin was discontinued on 4/12/21. A report for Resident B indicated her Lorazepam was discontinued on 6/25/20. A report for Resident C indicated her Pregabalin was discontinued on 11/19/20. Reports for Resident C indicated her Tramadol was discontinued on 1/13/21 and her Diphenoxylate Atrophine was discontinued on 2/11/21.

On 7/27/21, I interviewed officer MacArthur by telephone. Officer MacArthur stated that while at least some of the medications found were narcotics, based on the context of the situation it did not appear anyone was attempting to steal them. Officer MacArthur stated that he and Mr. Madak agreed that it appeared as if staff had not followed the appropriate protocol for disposing of medications. Officer MacArthur stated he would not be pursuing the issue as a criminal matter.

<b>APPLICABLE RULE</b>	
<b>R 325.1932</b>	<b>Resident medications.</b>
	<b>(6) Prescription medication that is no longer required by a resident shall be properly disposed of after consultation with a licensed health care professional or a pharmacist.</b>
<b>ANALYSIS:</b>	According to the complaint, several of the medications found improperly stored, were also not properly disposed of. The investigation revealed that several of the medications turned over the police on 7/23/21 had been discontinued for at least a month to several months ago and never disposed of. Based on the findings the allegation is substantiated.

<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>
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On 7/29/21, I discussed the findings of the investigation with authorized representative Michele Locricchio.

#### IV. RECOMMENDATION

It is recommended that the licensee work cooperatively with the CNO contracted consultant in developing an acceptable corrective action plan. Contingent upon receipt of an acceptable corrective action plan, I recommend the status of the license and CNO remain unchanged.

*Aaron L. Clum*

7/27/21

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Aaron Clum  
Licensing Staff

Date

Approved By:

*Russell Misiak*

7/28/21

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Russell B. Misiak  
Area Manager

Date