



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

ORLENE HAWKS  
DIRECTOR

April 13, 2023

Subbu Subbiah  
Woodland Park Assisted Living LLC  
2585 Stanton St.  
Canton, MI 48188

RE: License #: AM250309137  
Investigation #: 2023A0580023  
Woodland Park Assisted Living

Dear Mr. Subbiah:

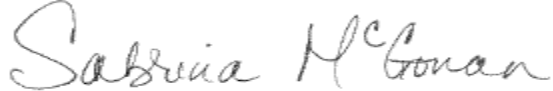
Attached is the Special Investigation Report for the above referenced facility. Due to the violations identified in the report, a written corrective action plan is required. The corrective action plan is due 15 days from the date of this letter and must include the following:

- 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 (517) 643-7960.

Sincerely,

A handwritten signature in cursive script that reads "Sabrina McGowan".

Sabrina McGowan, Licensing Consultant  
Bureau of Community and Health Systems  
611 W. Ottawa Street  
P.O. Box 30664  
Lansing, MI 48909  
(810) 835-1019

enclosure

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

**I. IDENTIFYING INFORMATION**

<b>License #:</b>	AM250309137
<b>Investigation #:</b>	2023A0580023
<b>Complaint Receipt Date:</b>	02/22/2023
<b>Investigation Initiation Date:</b>	02/23/2023
<b>Report Due Date:</b>	04/23/2023
<b>Licensee Name:</b>	Woodland Park Assisted Living LLC
<b>Licensee Address:</b>	2363 E. Coldwater Rd. Flint, MI 48505
<b>Licensee Telephone #:</b>	(812) 202-9149
<b>Administrator:</b>	Ponnommal Subbiah
<b>Licensee Designee:</b>	Subbu Subbiah
<b>Name of Facility:</b>	Woodland Park Assisted Living
<b>Facility Address:</b>	2363 E. Coldwater Road Flint, MI 48505
<b>Facility Telephone #:</b>	(812) 202-9149
<b>Original Issuance Date:</b>	09/22/2011
<b>License Status:</b>	REGULAR
<b>Effective Date:</b>	12/13/2021
<b>Expiration Date:</b>	12/12/2023
<b>Capacity:</b>	12
<b>Program Type:</b>	AGED ALZHEIMERS

## II. ALLEGATION(S)

	<b>Violation Established?</b>
Pam Rinoldo-Dikos is accessing resident records and confidential information. She is not an employee.	Yes
Pam Rinoldo-Dikos changed the residents health care provider without permission from the guardians.	No
Additional Findings	Yes

## III. METHODOLOGY

02/22/2023	Special Investigation Intake 2023A0580023
02/23/2023	Special Investigation Initiated - Telephone A call was made to the licensee designee, Mr. Subbiah.
03/01/2023	Contact - Telephone call made A call was made to Relative Guardian A.
03/17/2023	Contact - Telephone call made A call was made to Relative Guardian B.
03/20/2023	Inspection Completed On-site An unannounced onsite was conducted at Woodland Park.
03/20/2023	Contact - Face to Face Interview with Resident C.
03/20/2023	Contact - Face to Face Interview with Resident D.
03/20/2023	Contact - Face to Face Interview with direct staff, Ms. Kirsten Albring.

04/07/2023	Contact - Document Received Email of documents requested received.
04/10/2023	Contact - Telephone call made Spoke with Relative Guardian C.
04/10/2023	Contact - Telephone call made Spoke with Relative Guardian D.
04/11/2023	Contact - Telephone call made Follow-up call made to the licensee, Mr. Subbiah.
04/13/2023	Exit Conference An exit was held with the licensee designee.

**ALLEGATION:**

Ms. Pam Rinoldo-Dikos is accessing resident records and confidential information. She is not an employee.

**INVESTIGATION:**

On 02/22/2023, I received a complaint via BCAL Online complaints.

On 02/23/2023, I spoke with the licensee, Mr. Subbu Subbiah. Mr. Subbiah denied that Pam Rinoldo-Dikos is an employee. He stated that she is a representative of All American Home Health Care and Hospice. Due to her connection with the residents, he sought out her knowledge and expertise in assisting him with running things more smoothly at the AFC. Mr. Subbiah stated Ms. Rinoldo-Dikos has assisted with ordering resident medication and completing incident reports in the past. She has not assisted in any resident care, cooking or housekeeping tasks. Prior to hiring the new facility manager in January of 2023, she has had access to resident files. Mr. Subbiah admits that when he was out of the country in December of 2022, Ms. Rinoldo-Dikos was assisting at the facility and deemed as in charge in his absence, in case of an emergency. He denied that she has any current direct access to resident files. Mr. Subbiah stated that she is currently considered a volunteer at the facility. A volunteer employee file has been created.

On 03/20/2023, I conducted an unannounced onsite inspection while at Woodland Park AFC. Contact was made with Ms. Aisha Pettigrew. Ms. Pettigrew stated that she is currently serving in the role of floor manager. Ms. Pettigrew stated that to her knowledge, Ms. Rinoldo-Dikos assists with the paperwork when new residents enter the facility, she also helps to clean and organize the facility. She visits at least 3 x's a week.

On 03/20/2023, I interviewed direct staff, Ms. Kirsten Albring. She stated that Ms. Pam Rinoldo-Dikos typically serves as one of the bosses at the facility. She often instructs and assigns tasks to staff. She visits the facility several days a week.

On 03/20/2023, I spoke with Resident D, who identified Ms. Pam Rinoldo-Dikos as the assistant to the owner.

On 04/07/2023, I received a reviewed a copy of the volunteer file created for Ms. Pam Ms. Rinoldo-Dikos. An ICHAT was completed on 02/27/2023

On 04/10/2023 I spoke with Relative Guardian C, who stated that she has had contact with Ms. Rinoldo-Dikos on a few occasions while visiting the facility, however, she is unsure of what her role is. She recalls one occasion while onsite speaking with the licensee, Ms. Rinoldo-Dikos interrupted and introduced herself. Other staff in the home have indicated to her that Ms. Rinoldo-Dikos is part-owner and second in command if the licensee is unavailable.

On 04/11/2023, I conducted a follow-up interview with the licensee designee, Mr. Subbu Subbiah. He reported that Ms. Ms. Rinoldo-Dikos has been limited as a volunteer since hiring the new facility manager in January 2023. He confirmed that she had no set schedule when on duty and no specific assigned tasks.

<b>APPLICABLE RULE</b>	
<b>MCL 400.734</b>	<p><b>400.734b. This amended section is effective January 9, 2009 except Section 734b(1)(e)(iv) after the word "or" which will not be effective until October 31, 2010.</b></p> <p><b>Employing or contracting with certain employees providing direct services to residents; prohibitions; criminal history check; exemptions; written consent and identification; conditional employment; use of criminal history record information; disclosure; failure to conduct criminal history check; automated fingerprint identification system database; report to legislature; costs; definitions.</b></p>
<b>ANALYSIS:</b>	<p>It was alleged that non-employee, Ms. Pam Rinoldo-Dikos Pam is accessing resident records and confidential information</p> <p>Licensee designee, Mr. Subbu Subbiah stated that Rinoldo-Dikos has had access to resident files in the past.</p>

	<p>Licensee designee, Mr. Subbu Subbiah stated that Rinoldo-Dikos has had access to resident files in the past.</p> <p>Licensee designee stated that while out of the country in December of 2022, Ms. Rinoldo-Dikos was assisting at the facility and deemed as in charge in his absence, in case of an emergency.</p> <p>Staff, Ms. Aisha Pettigrew stated that Ms. Rinoldo-Dikos assists with the paperwork when new residents enter the facility, she also helps to clean and organize the facility. She visits at least 3 x's a week.</p> <p>Staff, Ms. Kirsten Albring, stated that Ms. Pam Rinoldo-Dikos typically serves as one of the bosses at the facility. She often instructs and assigns tasks to staff. She visits the facility several days a week.</p> <p>Resident D, who identified Ms. Pam Rinoldo-Dikos as the assistant to the owner.</p> <p>Per the volunteer employee file on record for Ms. Rinoldo-Dikos, an ICHAT was completed on 02/27/2023.</p> <p>Based on interviews conducted and documents reviewed throughout the course of this investigation, there is enough evidence to support the rule violation, that non-employee-Ms. Pam Rinoldo-Dikos has been able to have direct access to residents and resident file information, prior to receiving a criminal history check.</p>
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**ALLEGATION:**

Ms. Pam Rinoldo-Dikos changed the residents health care provider without permission from the guardians.

**INVESTIGATION:**

On 02/23/2023, I spoke with the licensee, Mr. Subbu Subbiah. He denied that all the residents healthcare was changed by Ms. Rinoldo-Dikos. He stated that he wanted to consolidate to one medical group due to issues he was having with the former provider, Visiting Physicians Association (VPA). He was referred to Unified Medical Services by his volunteer, Ms. Pamela Rinoldo-Dikos. All guardians were made aware that the

change of the in-home health care provider would be changed to Unified Medical Services. He stated that while he did not send a formal letter, he did send a text message to the guardians regarding the potential change. The transfer to Unified Medical Services took place effective September 2022. Residents do not have to remain with Unified as their chosen provider and are able to opt out of the service.

On 03/01/2023, I spoke with Relative Guardian A. She shared that while speaking with the licensee, Mr. Subbiah, he casually stated, "Oh, by the way, I let VPA go based on Ms. Rinoldo-Dikos' recommendation". He identified Ms. Rinoldo-Dikos as his Medical Director of Services during his call. Relative Guardian A stated that she received no prior contact informing her of the change. Upon following up with VPA, she was informed that on 09/21/2022, Ms. Pam Rinoldo-Dikos contacted their office and indicated that their services would no longer be needed. Upon doing research of her own, she discovered that Ms. Laura Svinarich, Physician's Assistant, of Unified Medical Services is not a Medical Doctor (MD), she is a Physician's Assistant (PA). She stated that she is not satisfied with the services and will be switching Resident A back to VPA as his healthcare provider.

On 03/17/2023, I spoke with Relative Guardian B. She shared that Resident B was initially receiving services from VPA when placed in the home. She does recall receiving a text from the licensee stating that due to complaints with VPA he would be switching medical providers. She then stated that she was not sure that she would agree to who he would be choosing and would like to be contacted prior to any visits scheduled, to allow her to be present. Relative Guardian B complained that suddenly, on 12/7/2022 she received a text message from someone identifying themselves as an assistant to Ms. Laura, Svinarich, who she'd never heard of. It was then that she found out that Resident B had been seen by Unified Medical Services on 11/07/2022, without her knowledge. She also found out at that time that physical therapy had been ordered. Relative Guardian B stated that had they contacted her prior as she requested, she would have informed them that Resident B has unsuccessfully attempted physical therapy in the past.

Relative Guardian B adds that she was informed that Resident B was scheduled to have an appointment with Ms. Laura Svinarich, PA, on 03/03/2023 at the facility. Upon arriving at the facility, she was surprised to find that neither the licensee, Mr. Subbiah nor Ms. Nicole Spencer, Facility Manager, were present. Present was Ms. Pam Rinoldo-Dikos, who was overseeing each resident's medical appointment with Ms. Laura Svinarich, PA, ushering everyone into a room in the facility, with glass doors, where there was no privacy for an examination. When asked, Ms. Rinoldo-Dikos stated that she was assisting the doctor. Relative Guardian B adds that she was disturbed by the fact that Ms. Rinoldo-Dikos kept referring to Ms. Laura Svinarich, as a doctor, when she is only a Physician's Assistant.

On 03/20/2023, I conducted an interview with Resident C regarding his current doctor. He shared that previously saw Dr. Paez of VPA. He stated that to his knowledge, his



physician changed to the AFC's in-home health care provider United Medical Services. He thinks his guardian gave permission for the change.

On 03/20/2023, I conducted an interview with Resident D. He stated that he does not like the new doctor and wishes to return to his former physician. He believes that the decision to switch was made by his guardian, Relative Guardian D.

On 04/10/2023, I spoke with Relative Guardian C. She stated that while she does not recall the exact day, she does recall the licensee Mr. Subbiah indicating that he was thinking of changing the health care provider for the home and would send out paperwork once the decision was made. Relative Guardian C stated that she was never provided with any paperwork or given the option to choose. In addition, she just found out last week that Ms. Laura Svinarich is a Physician's Assistant, not a doctor, which she prefers.

On 04/10/2023, I spoke with Relative Guardian D. She stated that she agreed to the resident physician care being provided by the facility due to her inability to transport Resident D to and from his medical appointments. She adds that in addition, Resident D will be moving from the facility effective 4/12/2023 due to a 30-day notice issued to Resident D requesting that he be moved.

<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><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>It was alleged that Ms. Pam Rinoldo-Dikos changed the residents health care provider without permission from the guardians.</p> <p>Licensee, Mr. Subbu Subbiah denied the allegations. He stated that while he did not send a formal letter, he did send a text message to the guardians regarding the potential change. Residents do not have to remain with the chosen provider and are able to opt out of the service.</p>

	<p>Relative Guardian A stated that she received no prior contact informing her of the change. She is not satisfied with the services and will be switching Resident A back to his former healthcare provider.</p> <p>Relative Guardian B stated that she does recall receiving a text from the licensee stating that due to complaints with VPA he would be switching medical providers, however, she was not informed of whom prior to the change.</p> <p>Resident C stated that to his knowledge, his physician changed to the AFC's in-home health care provider United Medical Services with permission from his guardian.</p> <p>Resident D stated that he does not like the new doctor and wishes to return to his former physician. The decision to switch was made by his guardian, Relative Guardian D.</p> <p>Relative Guardian C stated that she does recall the licensee Mr. Subbiah indicating that he was thinking of changing the health care provider for the home and would send out paperwork once the decision was made. Relative Guardian C stated that she was never provided with any paperwork or given the option to choose.</p> <p>Relative Guardian D stated that she agreed to the resident physician care being provided by the facility due to her inability to transport Resident D to and from his medical appointments.</p> <p>Based on the interviews conducted with the licensee, residents and resident guardians, there is not enough evidence to support this licensing rule violation, as the residents do not have to remain with the chosen provider and are able to opt out of the service.</p>
<b>CONCLUSION:</b>	<b>VIOLATION NOT ESTABLISHED</b>

**ADDITIONAL FINDINGS:**

**INVESTIGATION:**

On 04/07/2023, I received a reviewed a copy of the volunteer employee file created for Ms. Rinoldo-Dikos. The statement signed by Ms. Rinoldo-Dikos and the licensee, Mr. Subbiah, indicating that Ms. Rinoldo-Dikos began volunteering on 01/01/2023.

The file does not contain any verification that Ms. Rinoldo-Dikos was given written policies and procedures at the time of her volunteer appointment.

<b>APPLICABLE RULE</b>	
<b>R 400.14207</b>	<b>Required personnel policies.</b>
	<b>(2) The written policies and procedures identified in subrule (1) of this rule shall be given to employees and volunteers at the time of appointment. A verification of receipt of the policies and procedures shall be maintained in the personnel records.</b>
<b>ANALYSIS:</b>	<p>The volunteer employee file reviewed for Ms. Rinoldo-Dikos contained a statement signed by Ms. Rinoldo-Dikos and the licensee, Mr. Subbiah, indicating that Ms. Rinoldo-Dikos began volunteering on 01/01/2023.</p> <p>The file does not contain any verification that Ms. Rinoldo-Dikos was provided with written copies of the policies and procedures identified in subrule (1), at the time of appointment.</p> <p>Due to the lack of information in the file, there is substantial evidence to support this rule violation.</p>
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**INVESTIGATION:**

On 04/07/2023, I received a reviewed a copy of the volunteer employee file created for Ms. Rinoldo-Dikos. There statement signed by Ms. Rinoldo-Dikos and the licensee, Mr. Subbiah, indicating that Ms. Rinoldo-Dikos began volunteering on 01/01/2023.

The file does not contain any verification that Ms. Rinoldo-Dikos was given a written job description for volunteer employees.

<b>APPLICABLE RULE</b>	
<b>R 400.14207</b>	<b>Required personnel policies.</b>
	<b>(3) A licensee shall have a written job description for each position. The job description shall define the tasks, duties, and responsibilities of the position. Each employee and volunteer who is under the direction of the licensee shall receive a copy of his or her job description. Verification of receipt of a job description shall be maintained in the individuals personnel record.</b>

<b>ANALYSIS:</b>	The volunteer employee file reviewed for Ms. Rinoldo-Dikos contained a signed statement that Ms. Rinoldo-Dikos began volunteering effective 01/01/2023. The file does not contain any verification that Ms. Rinoldo-Dikos was given a written job description for volunteer employees.  Due to the lack of information in the file, there is substantial evidence to support violation of this rule.
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**INVESTIGATION:**

On 03/20/2023, staff, Ms. Pettigrew stated that Ms. Rinoldo-Dikos visits the facility at least 3 x's a week.

On 03/20/2023, staff, Ms. Kirsten Albring, stated that Ms. Pam Rinoldo-Dikos visits the facility several days a week.

On 04/11/2023, licensee designee, Mr. Subbu Subbiah reported that Ms. Rinoldo-Dikos has been limited as a volunteer since hiring the new facility manager in January 2023. He confirmed that she had no set schedule when on duty and no specific assigned tasks.

<b>APPLICABLE RULE</b>	
<b>R 400.14208</b>	<b>Direct care staff and employee records.</b>
	<b>(3) A licensee shall maintain a daily schedule of advance work assignments, which shall be kept for 90 days. The schedule shall include all of the following information: (a) Names of all staff on duty and those volunteers who are under the direction of the licensee.</b>
<b>ANALYSIS:</b>	The volunteer employee file reviewed for Ms. Rinoldo-Dikos contained a signed statement that Ms. Rinoldo-Dikos began volunteering effective 01/01/2023.  Staff, Ms. Pettigrew stated that Ms. Rinoldo-Dikos visits the facility at least 3 x's a week.  Staff, Ms. Kirsten Albring, stated that Ms. Pam Rinoldo-Dikos visits the facility several days a week.

	<p>Licensee designee, Mr. Subbu Subbiah, stated that Ms. Ms. Rinoldo-Dikos has been limited as a volunteering January 2023. He confirmed that she had no set schedule when on duty and no specific assigned tasks.</p> <p>Based on the licensee's failure to maintain a schedule of volunteers under the direction of the licensee, there is substantial evidence to support this rule violation.</p>
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

On 04/13/2023, I conducted an exit conference with the licensee sharing the findings of this investigation. A corrective action plan was requested for the established violations.

#### IV. RECOMMENDATION

Upon the receipt of an approved corrective action plan, no changes to the status of the license is recommended.

 April 13, 2023

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Sabrina McGowan Date  
Licensing Consultant

Approved By:

 April 13, 2023

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Mary E. Holton Date  
Area Manager