



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

MARLON I. BROWN, DPA  
ACTING DIRECTOR

August 16, 2023

Ellen Byrne  
Commonwealth Senior Living at East Paris  
3956 Whispering Way, SE  
Grand Rapids, MI 49546

RE: Application #: AH410407276  
Commonwealth Senior Living at East Paris  
3956 Whispering Way, SE  
Grand Rapids, MI 49546

Dear Ms. Byrne:

Attached is the Original Licensing Study Report for the above referenced facility. The study has determined substantial compliance with applicable licensing statutes and administrative rules. Therefore, a temporary license with a maximum capacity of 90 is issued.

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 (877) 458-2757.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrea Krausmann".

Andrea Krausmann, Licensing Staff  
Bureau of Community and Health Systems  
611 W. Ottawa Street  
P.O. Box 30664  
Lansing, MI 48909  
(586) 256-1632

enclosure

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

**I. IDENTIFYING INFORMATION**

**License #:** AH410407276

**Applicant Name:** MCAP East Paris Opco, LLC

**Applicant Address:** Suite 115  
21800 Haggerty Rd.  
Northville, MI 48167

**Applicant Telephone #:** (434) 963-2421

**Authorized Representative:** Ellen Byrne

**Name of Facility:** Commonwealth Senior Living at East Paris

**Facility Address:** 3956 Whispering Way, SE  
Grand Rapids, MI 49546

**Facility Telephone #:** (616) 949-9500

**Application Date:** 02/16/2021

**Capacity:** 90

**Program Type:** AGED  
ALZHEIMERS

## II. METHODOLOGY

02/16/2021	Enrollment
02/16/2021	Application Incomplete Letter Sent 1326/HFA Fingerprint/RI 030 for applicant's authorized representative Marcia Curtiss
02/17/2021	Contact - Document Sent 1605 sent to applicant
07/20/2021	Construction Permit Received Permit 20210048-P1 dated 7/20/21 to expire 7/20/22 - conversion of 5-20 bed AFC licenses into an 82 bed HFA. One building to be renovated as part of this project. There will be 82 units each with one licensed bed. An emergency generator will service the facility per Pier-George Zanoni PE HFES. Austin Webster Engineer also provided letter to William at MCAP about the project.
07/20/2022	Application Incomplete Letter Sent Policies & procedures requested sent to AR Marcia Curtiss via email
05/15/2023	Contact - Document Received Attestation from MCAP East Paris Opco LLC president, Richard G. Corey, attesting that no resident funds and no refundable deposits will be held, therefore, no surety bond is required.
05/30/2023	Contact - Document Received BCAL1603 changing authorized representative from Marcia Curtiss to Ellen Byrne signed by Richard Corey, President of MCAP East Paris Opco LLC and dated 5/03/2023.
05/30/2023	Contact - Document Received BCAL1606 changing administrator from Tim Simmons to Mackenzie Ferguson, along with M. Ferguson's resume, signed by authorized representative Ellen Byrne and dated 05/24/2023.
05/30/2023	Contact - Document Received Revised application received changing name of facility from Addington Place of East Paris to Commonwealth Senior Living at East Paris, also changed address from 3980 Whispering Way SE to 3956 Whispering Way SE, and changed # of beds from 82 to 90. I notified HFES Austin Webster and BFS inspector Philip Scheer of the changes.
06/01/2023	Occupancy Approval (AH ONLY) HFES occupancy approval by Austin Webster for 90 beds.

07/12/2023 Contact - Document Sent  
Email to BFS inspector Philip Scheer asking status. Mr. Scheer called back and explained the kitchen hood documentation is still needed. BFS report will be forthcoming.

07/13/2023 Inspection Completed On-site  
Met with administrator Mackenzie Ferguson on-site.

07/13/2023 Contact - Document Received  
Ms. Ferguson submitted video demonstrating that the exhaust ventilation was now functioning in the janitor closet of building #8.

08/02/2023 Contact – Document Sent  
Emailed BFS inspector Philip Scheer cc: Rick Day supervisor. Please send or let me know when BFS approval is expected.

08/02/2023 Contact - Document Received  
BFS inspector Philip Scheer responded that the kitchen hood review is still in BFS plan review. BFS supervisor Rick Day provided BFS plan review manager Pat Riney's phone number.

08/03/2023 Contact – Document Sent  
Emailed BFS plan review manager Pat Riney. Also left a voice mail message.

08/04/2023 Contact – Document Received  
BFS plan review manager Pat Riney wrote Norm Grant has completed the review on 7/25/23. It's been processed and an automated email should have been sent to the applicant with the required 12-A documentation for the completion of testing. Once testing has passed, the contractor will need to return the 12-A form to allow for a visit from the inspector for final.

08/09/2023 Inspection Completed – Fire Safety: A  
Report completed on 08/07/2023 by BFS inspector Philip Scheer and received from the applicant's authorized representative Ellen Byrne on 08/09/2023.

### III. DESCRIPTION OF FINDINGS & CONCLUSIONS

#### A. Physical Description of Facility

Commonwealth Senior Living at East Paris has been licensed and operating, as four separate twenty-bed adult foster care facilities, dating back to 07/07/1988. The most recent license numbers:

- AL410404573 Commonwealth Senior Living at East Paris #8
- AL410404574 Commonwealth Senior Living at East Paris #7
- AL410404575 Commonwealth Senior Living at East Paris #6
- AL410404576 Commonwealth Senior Living at East Paris #5

In February 2021, the owner applied for Chapter 33 type home for the aged licensure by converting the four adult foster care properties into one structure with construction of a main entrance and integration of all four facilities.

Given the construction materials of the initial structures, this license application is defined as a board and care facility under Chapter 33 of the National Fire Protection Association standard 101. According to Bureau of Fire Services requirements, a Chapter 33 type of a home for the aged building requires residents to evacuate the building in times of disaster. This will include evacuation during fire drills, as well.

Commonwealth Senior Living at East Paris is located on the south side Whispering Way, an extended two-way driveway-type passage zoned 15 mph that traverses various apartment-style residential buildings and offices. This residential facility is located in a rural wooded residential area at the center of Kent County. Parking is in front and on along the side of the building.

The facility's main entrance leads into the assisted living area of the facility. This area was designed for residents that require assistance with activities of daily living. The assisted living area includes the lobby, administrative offices, the main kitchen, staff offices/desk areas, various day/dining/activity spaces, a spa room, the hair salon, laundry rooms and medication room.

According to the Department's Health Facilities Engineering Section room sheets, there are 56 residential units in this assisted living area of this facility, including four units designated for double occupancy, for a total capacity of 60 assisted living beds. Specifically, the double-occupancy units are numbered as: 501, 513, 601, and 613.

At the end of the 500 hall, between rooms 501 and 502, there is an extended corridor with a locked door that connects the building to an unlicensed independent living facility. The adjacent unlicensed independent living facility is comprised of four interconnected buildings with 36 residential units, and it is also operated by MCAP East Paris Opco, LLC. There is no shared building space between the licensed facility and the unlicensed facility. Residents of the independent living facility have their own entrances and if

visiting, will enter this home for the aged through the main entrance, as all visitors are expected to do.

This facility's memory care area is located on the north side of the building. It is a secured unit designed for individuals who have been diagnosed with Alzheimer's disease or a related condition. There are 26 residential units in the memory care area with four units approved for double occupancy: Units 811, 812, 813, and 824, for a total capacity of 30 memory care beds. The memory care area is entered via the assisted living. For resident safety, main exit doors in the memory care area are secured with delayed egress bars that sound an alarm when opened. The windows in this area are equipped with stop devices so that they can only be opened a few inches, also for resident safety.

The memory care unit has its own day/dining/activity space, a meal service area, a staff office/desk area, two spa rooms, and laundry room. Meals are prepared in the main kitchen and then transported into the memory care unit for serving.

Most every residential unit has an attached bathroom with shower, the exception being 20 of the 26-memory care residential units that have attached water closets, each consisting of a sink and commode. There are two spas in the memory care unit, one has a shower, and one has a spa tub.

Each residential unit has its own individualized HVAC thermostat. Emergency pull cords are present in all resident bathrooms and bedrooms to summon assistance from staff. Personal emergency pendants are also available upon request to summon staff assistance. Staff are alerted to the pull cords and pendant summons via cell phone devices that inform them specifically which resident is requesting care. Staff also utilize walkie-talkies for communication.

A bed and bedside table along with towels, washcloths, and linens are available to all residents, although residents are encouraged to bring their own furniture and personal belongings for their own comfort.

The home is equipped with video monitoring cameras in the kitchen, medication rooms, staff break room, and communal areas.

The facility has one exterior courtyard for use by the memory care area residents. The courtyard is surrounded by the building on three sides and the fourth side has an approximate seven-foot-tall decorative metal fence with a keypad type locked gate. The gate lock disengages with staff entering a code number and/or by initiation of the fire alarm system.

This facility has municipal water and sewer. The facility is equipped with a whole home fire suppression system. According to the Bureau of Fire Services, the residents of this home for the aged, which is to be licensed under Chapter 33 board and care facility standards, are expected to evacuate the building in case of fire and fire drills.

## **B. Program Description**

Commonwealth Senior Living at East Paris is owned and operated by MCAP East Paris Opco, LLC. A business entity search of the State of Michigan Department of Licensing and Regulatory Affairs Corporations Online Filing System revealed MCAP East Paris Opco, LLC is a foreign limited liability company, organized 02/24/2020 in the state of Delaware, with a Michigan qualification date of 3/09/2020. MCAP East Paris Opco, LLC has registered assumed names of Commonwealth Senior Living at East Paris and Lakeside Senior Living at East Paris.

As a licensed home for the aged, MCAP East Paris Opco, LLC proposes to provide room, board, and supervised personal care to individuals aged 55 and older in the facility known as Commonwealth Senior Living at East Paris. The facility also represents to the public the provision of services to individuals with Alzheimer's disease or related conditions. Initial and ongoing training will be provided to all staff including specialized training for those working in the memory care area.

Commonwealth Senior Living at East Paris is a smoke-free facility.

On 05/15/2023, MCAP East Paris Opco, LLC's president Richard Corey submitted a letter attesting Commonwealth Senior Living at East Paris will not hold resident funds nor refundable deposits. Therefore, no surety bond is necessary.

In addition, Mr. Corey's 05/15/2023 letter attests that Commonwealth Senior Living at East Paris will not serve food to any non-residents, such as residents' family members, employees, vendors, and visitors. Therefore, no food service establishment license is required.

## **C. Rule/Statutory Violations**

On 06/01/2023, the Dept. of LARA Health Facilities Engineering Section (HFES) engineer Austin Webster issued an Opening Survey with Occupancy Approval, Room Sheets, and Floor Plan approving 82 residential units and identifying eight units having double occupancy for a total capacity of 90 beds.

Mr. Webster relayed that the facility is serviced by two emergency generators (100 kW and 150 kW respectively) that meet compliance with MCL333.21335, such that during an interruption of the normal electrical supply, the two generators will provide no less than four hours of service and generate enough power to provide lighting at all entrances and exits and to operate equipment to maintain fire detection, alarm, and extinguishing systems, telephone switchboards, heating plant controls, and other critical mechanical equipment essential to the safety and welfare of the residents, personnel, and visitors.

On 07/13/2023, I conducted an on-site inspection of the building and met with administrator Mackenzie Ferguson. One exhaust vent in a janitor closet was not functioning, but later that day, Ms. Ferguson sent a video demonstrating that the exhaust vent had been addressed and was functioning as required.

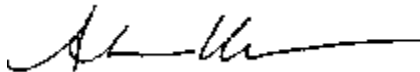
According to Mr. Webster's Occupancy Approval Transmittal, the Dept. of LARA Bureau of Fire Services (BFS) state fire inspector Phillip Scheer issued fire safety certification approval on 05/31/2023, but no BFS report was submitted to licensing. On 6/12/2023, in a telephone conversation, Mr. Scheer said he verbally informed Mr. Webster of the fire safety approval for most of the home and explained there was an issue with documentation on a kitchen hood. Once that documentation is received, Mr. Scheer will document fire safety approval.

On 08/09/2023, the applicant's authorized representative, Ellen Byrne, submitted a BFS approval report dated 08/07/2023, that was completed by Mr. Scheer.

Therefore, the study has now determined substantial compliance with Public Health Code Act 368 of 1978, as amended, and the administrative rule requirements related to a licensed home for the aged.

#### IV. RECOMMENDATION

It is recommended that a temporary 6-month home for the aged license/permit for this facility be issued. The terms of the license will enable the licensee to operate a home for the aged with a total capacity of 90 licensed beds [60 AL and 30 MC] with programs for aged individuals and individuals with Alzheimer's disease or related condition care.



08/09/2023

---

Andrea Krausmann  
Licensing Staff

Date

Approved By:



08/16/2023

---

Andrea L. Moore, Manager  
Long-Term-Care State Licensing Section

Date