



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN, DPA
ACTING DIRECTOR

September 7, 2023

Louis Andriotti, Jr.
IP Vista Springs Washington Place OpCo, LLC
2610 Horizon Drive SE., Ste 110
Grand Rapids, MI 49546

RE: License #: AL500393430
Investigation #: 2023A0604022
Vista Springs Washington Place - Spring Harbor

Dear Mr. Andriotti:

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 (248) 975-5053.

Sincerely,

A handwritten signature in cursive script that reads "Kristine Cilluffo".

Kristine Cilluffo, Licensing Consultant
Bureau of Community and Health Systems
Cadillac Place
3026 West Grand Blvd Ste 9-100
Detroit, MI 48202
(248) 285-1703

enclosure

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

I. IDENTIFYING INFORMATION

License #:	AL500393430
Investigation #:	2023A0604022
Complaint Receipt Date:	05/22/2023
Investigation Initiation Date:	05/23/2223
Report Due Date:	07/21/2023
Licensee Name:	IP Vista Springs Washington Place OpCo, LLC
Licensee Address:	Ste 110 2610 Horizon Drive SE. Grand Rapids, MI 49546
Licensee Telephone #:	(616) 710-2049
Administrator:	Kristina Djelevic
Licensee Designee:	Louis Andriotti, Jr.
Name of Facility:	Vista Springs Washington Place - Spring Harbor
Facility Address:	11900 Vista Springs Blvd. Washington Township, MI 48095
Facility Telephone #:	(586) 331-9400
Original Issuance Date:	09/27/2019
License Status:	REGULAR
Effective Date:	03/27/2022
Expiration Date:	03/26/2024
Capacity:	20
Program Type:	AGED ALZHEIMERS

II. ALLEGATION(S)

	Violation Established?
The night shift is having inappropriate relationships with one another on the premise.	No
Residents are allowed to use vape pens and smoke marijuana.	No
When the residents are discharged or pass away, the staff members, including management, are taking the leftover prescriptions home.	No
A staff member is homeless, so he resides at the facility.	No
Additional Findings	Yes

III. METHODOLOGY

05/22/2023	Special Investigation Intake 2023A0604022
05/23/2023	Special Investigation Initiated - Letter Email to and from Adult Protective Services (APS) Worker, Emily Poley. No open APS referral. No residents named in complaint.
05/24/2023	Inspection Completed On-site Completed unannounced onsite investigation. Interviewed Administrator, Kristina Djelevic and Staff, Brittney Adams, Andrea Kreger, Hannah Nowlin and Michelle Fremont.
05/24/2023	Contact - Document Received Email from Kristina Djelevic with medication records, employee record /clearance and smoking policy. Sent return emails.
07/12/2023	Exit Conference Completed exit conference with Administrator, Kristina Djelevic by phone.

ALLEGATION:

The night shift is having inappropriate relationships with one another on the premise.

INVESTIGATION:

On 05/22/2023, I received a licensing complaint regarding Vista Springs Washington Place- Spring Harbor. It was alleged that anonymous caller wants to report the

following: residents are allowed to use vape pens and smoke marijuana. A staff member is homeless, so he resides at the facility. The night shift is having inappropriate relationships with one another on the premise. Also, when the residents are discharged or pass away, the staff members, including management, are taking the leftover prescriptions home.

On 05/23/2023, I received email from APS Worker, Emily Poley. Ms. Poley stated that APS does not have an open investigation at Vista Springs. There are no residents named in complaint.

On 05/24/2023, I completed an unannounced onsite investigation at Vista Springs Washington Place- Spring Harbor. I interviewed Administrator, Kristina Djelevic and Staff, Brittney Adams, Andrea Kreger, Hannah Nowlin and Michelle Fremont.

On 05/24/2023, I interviewed Administrator, Kristina Djelevic at Vista Springs. She stated that there have been no complaints made regarding inappropriate relationships between staff on midnight shift. She has not seen anything inappropriate during that shift. Ms. Djelevic was not aware of any incidents that would cause an allegation to be made regarding relationships between staff.

On 05/24/2023, I interviewed Staff, Brittney Adams at Vista Springs. Ms. Adams stated that she has worked at Vista Springs since 2018 and is the Health and Wellness Coordinator. She stated that she has not heard of any relationships between staff since she first started years ago. She was not aware of any incidents regarding staff having inappropriate relationships onsite.

On 05/24/2023, I interviewed Staff, Andrea Kreger. She stated that she worked at Vista Springs as a caregiver for five years and a sous chef for one and a half years. She stated that she has not seen any inappropriate relationships between staff. She has not heard of any complaints regarding inappropriate relationships between staff.

On 05/24/2023, I interviewed Staff, Hannah Nowlin at Vista Springs. Ms. Nowlin stated that she has worked at Vista Springs for three years and is a sous chef. Ms. Nowlin stated that there are no inappropriate relationships between staff at the facility.

On 05/24/2023, I interviewed Staff, Michelle Fremont at Vista Springs. She stated that she has worked at Vista Springs for five and a half years and is a med tech. She stated there were rumors a long time about staff dating, however, she believed this occurred in 2017. Ms. Fremont was not aware of any inappropriate relationships between staff.

APPLICABLE RULE	
R 400.15206	Staffing requirements.
	(2) A licensee shall have sufficient direct care staff on duty at all times for the supervision, personal care, and protection of residents and to provide the services

	specified in the resident's resident care agreement and assessment plan.
ANALYSIS:	There is not enough information to determine that staff are having inappropriate relationships on premises. No staff were named in complaint. Administrator, Kristina Djelevic and staff interviewed were not aware of any inappropriate relationships between staff.
CONCLUSION:	VIOLATION NOT ESTABLISHED

ALLEGATION:

Residents are allowed to use vape pens and smoke marijuana.

INVESTIGATION:

On 05/24/2023, I interviewed Kristina Djelevic at Vista Springs. She stated that Vista Springs is a smoke free facility. No one is allowed to smoke in the facility, and they have a written policy. Ms. Djelevic stated that they do not have any residents that use vape pens. She stated that they had one resident for respite care whose son would pick him up and she believed they would use marijuana on their visits, however, she is not sure what they do when out.

On 05/24/2023, I received copy of Vista Spring's Smoking Policy by email from Kristina Djelevic. The smoking policy references Act 188- Smoking Ban in Public Places and House Bill 4377 which amended the Public Health Code to prohibit smoking in public places. The policy indicates that if licensee accepts a resident that smokes, the administrator must assure resident is aware and is able to comply with the smoking ban that prohibits smoking.

On 05/24/2023, I interviewed Staff, Brittney Adams at Vista Springs. Ms. Adams stated that there are no residents using vape pens or marijuana at facility. She stated that the smoke alarms would probably go off if a resident tried to smoke in building. She has not observed any vape pens in building. Ms. Adams stated that she could not think of any incidents involving smoking at facility.

On 05/24/2023, I interviewed Staff, Andrea Kreger. Ms. Kreger believed she heard that there was one resident who had smoked marijuana in the courtyard, however, not inside the building. She stated that it was recommended by a nurse to increase his appetite.

On 05/24/2023, I interviewed Staff, Hannah Nowlin. She has not observed anyone smoking marijuana or using a vape pen at the facility.

On 05/24/2023, I interviewed Staff, Michelle Fremont at Vista Springs. She stated that no residents use marijuana or vape pens at facility. She has never seen residents smoking or using vape pens at Vista Springs.

APPLICABLE RULE	
R 400.15305	Resident protection.
	(3) A resident shall be treated with dignity and his or her personal needs, including protection and safety, shall be attended to at all times in accordance with the provisions of the act.
ANALYSIS:	There is not enough information to determine that residents are smoking marijuana or using vape pens at Vista Springs. On 05/24/2023, I received copy of Vista Spring's smoking policy which bans smoking on property. No staff have observed residents using marijuana or vape pens.
CONCLUSION:	VIOLATION NOT ESTABLISHED

ALLEGATION:

When the residents are discharged or pass away, the staff members, including management, are taking the leftover prescriptions home.

INVESTIGATION:

On 05/24/2023, I interviewed Kristina Djelevic at Vista Springs. She stated that there have been no complaints regarding missing medications or staff taking medications that are no longer needed. She stated that all medications go home with family at time of discharge or medications are sent back to pharmacy if no longer needed. Narcotic medications are destroyed in a solution onsite, and they always have two people witness medication being destroyed. One Care Pharmacy picks up medications that are being returned daily at 8:00 pm. Ms. Djelevic had plastic bin in her office with packs of medications that were being held in order to return to pharmacy. Medications are packaged to return with a One Care Resident Medication Return slip that lists resident name, prescription information, quantity and reason for return. On 05/24/2023, Ms. Djelevic emailed copy of Controlled Substance Proof of Use Record which staff sign to confirm count of narcotics.

On 05/24/2023, I interviewed Staff, Brittney Adams at Vista Springs. She stated that she was not aware of any incidents of leftover medications being taken by staff. She stated that medications are disposed of immediately. Two staff must sign off when narcotics are destroyed such as hospice nurse and one of their staff. Ms. Adams did not report any concerns regarding facility.

On 05/24/2023, I interviewed Staff, Andrea Kreger. She stated that management does weekly audit of medications. Narcotic medications that are no longer needed are destroyed onsite with a solution or medications are sent back to pharmacy. She has not heard any rumors regarding staff taking medications or missing medications. Ms. Kreger did not have any concerns regarding facility.

On 05/24/2023, I interviewed Staff, Hannah Nowlin at Vista Springs. She stated that she has never heard of staff taking medications from facility. Ms. Nowlin stated that she is not involved in passing medications or the disposal of medications at Vista Springs. She did not have any concerns regarding facility.

On 05/24/2023, I interviewed Staff, Michelle Fremont at Vista Springs. She stated that staff are not taking leftover medications. Narcotic medications must be destroyed. She stated that that narcotic pills are disposed of in jugs and empty packages are placed in trash. Two people sign off to confirm the medication was destroyed. Ms. Fremont stated that sometimes medications are sent back to pharmacy and families can get credit for leftover medication. She stated that the pharmacy comes to pick up leftover medications every night except Sundays. Ms. Fremont had no concerns regarding facility.

APPLICABLE RULE	
R 400.15312	Resident medications.
	(7) Prescription medication that is no longer required by a resident shall be properly disposed of after consultation with a physician or a pharmacist.
ANALYSIS:	There is not enough information to confirm that staff are taking leftover medications. On 05/24/2023, I observed medications in office packaged to be returned to pharmacy. In addition, Administrator Kristina Djelevic and staff indicated that narcotic medications are destroyed onsite when no longer needed.
CONCLUSION:	VIOLATION NOT ESTABLISHED

ALLEGATION:

A staff member is homeless, so he resides at the facility.

INVESTIGATION:

On 05/24/2023, I interviewed Kristina Djelevic at Vista Springs. Ms. Djelevic stated that Staff 1 was homeless for a period of time but has never resided at facility. They do not

have any staff residing at Vista Springs. Ms. Djelevic stated that Staff 1 has worked at Vista Springs for 7-8 years and is one of their oldest and best employees. She stated that when he was homeless, she believes he would sleep in his car at Walmart. She indicated that he has since found an apartment. Ms. Djelevic stated that she has employee file with all required information for Staff 1. On 05/24/2023, I received email from Ms. Djelevic with Staff 1's application with identifying information and fingerprinting clearance eligibility letter.

On 05/24/2023, I interviewed Staff, Brittney Adams at Vista Springs. She stated that there are no staff living at facility. Ms. Adams stated that Staff 1 had said he was homeless, however, she believes he was staying at a hotel.

On 05/24/2023, I interviewed Staff, Hannah Nowlin at Vista Springs. Ms. Nowlin stated that there are no staff living at facility.

On 05/24/2023, I interviewed Staff, Andrea Kreger. She stated that there are no staff living at Vista Springs. She has never known of any staff living at the facility.

On 05/24/2023, I interviewed Staff, Michelle Fremont at Vista Springs. She stated that Staff 1 was staying in his car. She believes he is staying somewhere else now. There are no staff sleeping in building.

APPLICABLE RULE	
R 400.15408	Bedrooms generally.
	(2) A living room, dining room, hallway, or other room that is not ordinarily used for sleeping or a room that contains a required means of egress shall not be used for sleeping purposes by anyone.
ANALYSIS:	There is not enough information to determine that there is a staff member who is homeless residing at Vista Springs. Administrator, Kristina Djelevic and staff interviewed stated that there are no staff living at Vista Springs. Staff 1 was reported to be homeless in the past, however, has not lived at the facility. I informed facility that licensing rules do not prohibit staff from living at facility if they are cleared as a member of household. Also, staff must not sleep in a room not ordinarily used for sleeping.
CONCLUSION:	VIOLATION NOT ESTABLISHED

ADDITIONAL FINDINGS:

INVESTIGATION:

On 05/24/2023, I completed an unannounced onsite investigation at Vista Springs. I interviewed Administrator, Kristina Djelevic, in her shared office. During the onsite investigation, I observed a plastic tub of medications in the office that were being held to return to pharmacy. The medications were not locked in the office at the time of investigation.

I completed an exit conference by phone with Administrator, Kristina Djelevic, on 07/12/2023. I informed her of the violation found and that a copy of the special investigation report would be mailed once approved. I also informed her that a corrective action plan would be requested. Ms. Djelevic stated that medications to be returned have since been locked up in medication room.

APPLICABLE RULE	
R 400.15312	Resident medications.
	(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 {333.1101 et seq. of the Michigan Compiled Laws, kept with the equipment to administer it in a locked cabinet or drawer, and refrigerated if required.
ANALYSIS:	On 05/24/2023, during the onsite investigation, I observed a plastic tub of medications in an unlocked office. The medications were being returned to the pharmacy.
CONCLUSION:	VIOLATION ESTABLISHED

IV. RECOMMENDATION

Contingent upon an acceptable corrective action plan, I recommend no change in license status.

Kristine Cilluffo

07/12/2023

Kristine Cilluffo
Licensing Consultant

Date

Approved By:

Jay Calwerts

For

09/07/2023

Denise Y. Nunn
Area Manager

Date