



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN, DPA
ACTING DIRECTOR

August 29, 2023

Aniema Ubom
Care First Group Living & In-Home Services, Inc.
24111 Southfield Road
Southfield, MI 48075

RE: License #: AS630411027
Investigation #: 2023A0465028
The Winchester Residence

Dear Mr. Ubom:

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 "Stephanie Gonzalez".

Stephanie Gonzalez, LCSW
Adult Foster Care Licensing Consultant
Bureau of Community and Health Systems
Department of Licensing and Regulatory Affairs
Cadillac Place, Ste 9-100
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enclosure

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

I. IDENTIFYING INFORMATION

License #:	AS630411027
Investigation #:	2023A0465028
Complaint Receipt Date:	06/06/2023
Investigation Initiation Date:	06/12/2023
Report Due Date:	08/05/2023
Licensee Name:	Care First Group Living & In-Home Services, Inc.
Licensee Address:	24111 Southfield Road Southfield, MI 48075
Licensee Telephone #:	(248) 331-7444
Administrator:	Leslie Ubom
Licensee Designee:	Aniema Ubom
Name of Facility:	The Winchester Residence
Facility Address:	5522 Winchester Drive Troy, MI 48085
Facility Telephone #:	(248) 480-4162
Original Issuance Date:	08/10/2022
License Status:	REGULAR
Effective Date:	02/10/2023
Expiration Date:	02/09/2025
Capacity:	4
Program Type:	PHYSICALLY HANDICAPPED TRAUMATICALLY BRAIN INJURED

II.

ALLEGATION(S)

	Violation Established?
Licensee Designee, Aniema Ubom, and direct care staff, are not administering medical cannabis as prescribed.	No
Additional Findings	Yes

III. METHODOLOGY

06/06/2023	Special Investigation Intake 2023A0465028
06/12/2023	Special Investigation Initiated - On Site I conducted a walk-through of the facility, observed residents, reviewed resident files, and interviewed direct care staff, Merima Hadzialijagic
06/20/2023	Contact - Document Received Facility documents received via email
06/27/2023	Contact - Document Received Facility documents received via email
06/28/2023	Contact - Telephone call made I spoke to Guardian A1 and Guardian B1 via telephone
07/14/2023	Contact - Telephone call made I spoke to Guardian C1 via telephone
07/25/2023	Contact - Telephone call made I spoke to direct care staff, Bethany Wilkerson, via telephone
07/25/2023	Contact - Telephone call made I spoke to direct care staff, Christianna Livingston, via telephone
07/25/2023	Contact - Telephone call made I spoke to direct care staff, DeAngela Hayes, via telephone
07/31/2023	Contact - Telephone call made I spoke to direct care staff, Ayanna King, via telephone
07/31/2023	Contact - Telephone call made I spoke to direct care staff, Bridgette Brown, via telephone

07/31/2023	Exit Conference I conducted an Exit Conference with licensee designee, Aniema Ubom, via telephone
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ALLEGATION:

Licensee Designee, Aniema Ubom, and direct care staff, are not administering medical cannabis as prescribed.

INVESTIGATION:

On 6/6/2023, a complaint was received, alleging that licensee designee, Aniema Ubom and direct care staff, are not administering medical cannabis to residents as prescribed.

On 6/12/2023, I conducted an onsite investigation at the facility. At the time of my onsite investigation, there were four residents residing in the facility, all of which have traumatic brain injuries and cognitive deficits and were unable to be interviewed for this investigation. I conducted a walk-through of the facility, observed residents, reviewed resident files, and interviewed direct care staff, Merima Hadzialijagic.

Resident A's *Face Sheet* stated that he was admitted to the facility on 8/10/2022 and has a legal guardian, Guardian A1. The *Health Care Appraisal* lists Resident A's medical diagnosis as TBI and Cognitive Delay. The *Assessment Plan for AFC Residents* stated that Resident A requires supervision when in the community, has a history of aggressive and inappropriate sexual behavior, needs encouragement and prompting to complete self-care tasks and uses a walker for mobility assistance. The *Physician Order*, dated 1/3/2023, written by Dr. Saqib Nakadar, stated that Resident A is prescribed Cannabis Edible 5mg (Administer 1 package orally in am and at bedtime) and Vape Pen – THC (5 puffs via vape pen three times daily as needed. All ADL's must be completed.

Resident B's *Face Sheet* stated that he was admitted to the facility on 8/10/2022 and has a legal guardian, Guardian B1. The *Health Care Appraisal* listed Resident B's medical diagnosis as TBI and Cognitive Deficits. The *Assessment Plan for AFC Residents* stated that Resident A requires supervision in the community, has a history of aggressive behavior, independently completes self-care tasks with some prompting, and does not use assistive devices. The *Physician Order*, dated 1/3/2023, written by Dr. Saqib Nakadar, stated that Resident B is prescribed Cannabis Edible 5mg (1 packaged edible dose in am and at bedtime) and Vape Pen – THC (1-5 puffs up to three times daily). All ADL's must be completed.

Resident C's *Face Sheet* stated that he was admitted to the facility on 8/10/2022 and has a legal guardian, Guardian C1. The *Health Care Appraisal* listed Resident C's medical diagnosis as TBI and Chronic Pain. The *Assessment Plan for AFC Residents* stated that Resident A requires supervision in the community, has limited

communication skills, has a history of forgetfulness, agitation and self-harm behavior, needs assistance with all self-care tasks and uses a wheelchair and cane for mobility assistance. The *Physician Order*, dated 1/3/2023, written by Dr. Saqib Nakadar, stated that Resident C is prescribed Cannabis Edible 5mg (1 packaged edible dose in am and at bedtime) and Vape Pen – THC (1-5 puffs up to two times daily- Do not administer in evening). All ADL's must be completed.

Resident D's *Face Sheet* stated that he was admitted to the facility on 8/10/2022 and has a legal guardian, Guardian D1. The *Health Care Appraisal* listed Resident D's medical diagnosis as TBI and Schizophrenia. The *Assessment Plan for AFC Residents* stated that Resident A requires 1:1 supervision in the community, has limited communication skills, has a history of agitation and self-harm behavior, needs assistance with all self-care tasks and does use assistive devices. The *Physician Order*, dated 1/3/2023, written by Dr. Saqib Nakadar, stated that Resident D is prescribed Cannabis Edible 5mg (1 packaged edible dose in am and at bedtime) and Vape Pen – THC (1-5 puffs up to three times daily). All ADL's must be completed.

I reviewed the *Medication Administration Records* for April 2023, May 2023, and June 2023 and determined that Resident A, Resident B, Resident C, and Resident D are currently prescribed the following:

- Resident A: Medical Marijuana 5mg – Inhale 5 puffs via vape pen three times daily as needed; Medical Marijuana Edible 5mg – Administer 1 packaged edible dose orally in the AM and 1 edible at bedtimes as needed; Can be administered with PRN vape. All ADL's must be completed.
- Resident B: Medical Marijuana 5mg – Administer vape pen for 1 – 5 puffs, up to 3 times/day, 3 hours apart. All ADL's must be completed/confirmed before administration; Medical Marijuana Edible 5mg - Administer 1 packaged edible dose orally in the AM and 1 edible at bedtimes as needed; Can be administered with PRN vape.
- Resident C: Medical Marijuana 5mg – Administer vape pen for 1 – 5 puffs, up to 2 times/day-Do not administer in the evening). All ADL's must be completed/confirmed before administration; Medical Marijuana Edible 5mg - Administer 1 packaged edible dose orally in the AM and 1 edible at bedtimes as needed; Can be administered with PRN vape.
- Resident D: Medical Marijuana 5mg – Administer vape pen for 1 – 5 puffs, up to 3 times/day, 3 hours apart. All ADL's must be completed/confirmed before administration; Medical Marijuana Edible 5mg - Administer 1 packaged edible dose orally in the AM and 1 edible at bedtimes as needed; Can be administered with PRN vape.

In reviewing Resident A's and Resident B's *MAR's*, *Physician Orders*, and medication onsite at the facility, I did not find any discrepancies or medication errors.

I reviewed the facility's *Medical Cannabis Program Policy*, which stated the facility allows residents to receive prescription medical marijuana as long as it is prescribed by

a licensed physician for medical purposes, and the necessity of successful completion of activities of daily living (ADL's), as specified by Dr. Nakadar.

I reviewed the *Activities of Daily Living Log Sheet* for Resident A, Resident B, Resident C and Resident D, which adequately documents the daily compliance and completion of ADL's for each resident. This log appears to be properly maintained and contains daily staff initials, confirming each resident's compliance prior to administration of cannabis.

I interviewed direct care staff, Merima Hadzialijagic, who stated that she has worked at the facility for five years. Ms. Hadzialijagic stated, "All residents receive medical cannabis, and we administer it according to the label instructions. We do not alter or modify any prescriptions. However, the administration of the cannabis is contingent upon the residents' completion of their ADL's every day. If a resident does not complete their ADL's, then we are unable to administer the cannabis to them because this is part of the prescription order. But this is the only reason we would withhold the cannabis. I have never intentionally withheld medication from a resident as a form of punishment or mistreatment. And I am not aware of any other staff doing something like this either." Ms. Hadzialijagic denied knowledge of this allegation being true.

On 6/28/2023, I spoke to Guardian A1 and Guardian B1 via telephone. Guardian A1 and Guardian B1 stated, "I am aware of the medical marijuana prescriptions for Resident A and Resident B, and I am in agreement with this medication and the ADL completion requirement. Resident A and Resident B are doing well at the facility and I feel the staff are doing a good job of providing care. I have no concerns related to medication management."

On 7/25/2023, I spoke to direct care staff, Bethany Wilkerson, via telephone. Ms. Wilkerson stated that she has worked at the facility for four months. Ms. Wilkerson stated, "We administer every resident's medication as prescribed. For the cannabis, we review the MAR and compare it to the medication on-site at the facility. For all residents, they have a large bag that contains individually packaged cannabis edibles for them to take as prescribed. And the vape is kept in a secured area as well, and we count the number of puffs to ensure compliance. We also ensure that the residents have completed their ADL's for the day, prior to administering the cannabis, and we log their ADL compliance on our log sheets." Ms. Wilkerson denied knowledge of withholding or modifying any resident's medication.

On 7/25/2023, I spoke to direct care staff, Christianna Livingston, via telephone. Ms. Livingston stated that she has worked at the facility for four months. Ms. Livingston stated, "I have no concerns with medication and have not had any medication errors. We have a Cannabis Policy in place, that requires all residents prescribed cannabis, to complete ADL's prior to receiving their medication. I always follow this requirement. If a resident does not complete their ADL's, then we cannot administer their cannabis, but I have never had that happen. All of the residents have been compliant and have always completed their ADL's when I am working. I have never had any issues." Ms. Livingston denied knowledge of this complaint being true.

On 7/25/2023, I spoke to direct care staff, DeAngela Hayes, via telephone. Ms. Hayes stated that she has worked at the facility for five months. Ms. Hayes stated, "I think we do a good job with managing resident medications. I have never altered or withheld medication from a resident. We have a cannabis policy that we follow to ensure that residents are compliant with their ADL's. We all follow that policy and the residents have been compliant with the policy as well. I haven't had a time when a resident did not complete their ADL's." Ms. Hayes denied knowledge of this complaint being true.

On 7/31/2023, I spoke to direct care staff, Ayanna King, via telephone. Ms. King stated that she has worked at the facility for seven months. Ms. King stated, "I administer medications to all residents consistently and I have never had any issues. I have never intentionally withheld medication or altered a medication dosage. The residents have to complete their ADL's in order to receive their cannabis, and the residents are compliant with that. I haven't had any issues and I don't know of any other staff having issues either." Ms. King denied knowledge of this complaint being true.

On 7/31/2023, I interviewed direct care staff, Bridgette Brown, via telephone. Ms. Brown stated that she has worked at the facility for eight months. Ms. Brown stated, "I have not withheld or altered medications for any resident. I've never seen this happen during the time that I have worked at the facility. With our cannabis program, if residents complete their ADL's each day, they get their cannabis. And I haven't had any issues with this. We administer medications as prescribed. I don't have any concerns." Ms. Brown denied knowledge of this complaint being true.

On 7/31/2023, I spoke to Guardian C1 via telephone. Guardian C1 stated that she does not have any concerns related to the administration of medication to Resident C. Guardian C1 stated, "I think the staff are wonderful with Resident C and provide good care to him. I do not have any concerns about medication or anything else."

APPLICABLE RULE	
R 400.14312	Resident medications.
	(2) Medication shall be given, taken, or applied pursuant to label instructions.
ANALYSIS:	On 6/12/2023, I conducted an onsite investigation and reviewed the <i>Medication Administration Records, Physician Orders, Medical Cannabis Policy, and Daily Activities of Daily Living Log Sheet</i> . I did not observe any medication errors or discrepancies. According to Ms. Hadzialijagic, Ms. Wikerson, Ms. Livingston, Ms. Hayes, Ms. King, and Ms. Brown, they have never withheld or altered a residents prescription medication. Ms. Hadzialijagic, Ms. Wikerson, Ms. Livingston, Ms. Hayes, Ms. King, and Ms. Brown denied knowledge of this complaint being true.

	Based on the information above, there is not sufficient information to confirm that this allegation is true.
CONCLUSION:	VIOLATION NOT ESTABLISHED

ADDITIONAL FINDINGS:

INVESTIGATION:

On 6/12/2023, during my onsite investigation at the facility, I observed Resident A and Resident B's medical marijuana gummies were being stored in Ziplock baggies. The Ziplock baggies only contained Resident A, Resident B, Resident C and Resident D's first names and the number of edibles contained inside the bags. Within each bag were individually stapled smaller baggies, each containing one edible. The smaller stapled bags did not contain label information. I was unable to find any label information for the cannabis gummies that documented the type of Cannabis, or the dosage of the cannabis contained within each bag.

On 7/31/2023, I spoke to licensee designee, Aniema Ubom, via telephone. Mr. Ubom acknowledged that the cannabis gummies do not contain label information. Mr. Ubom stated that the cannabis gummies are delivered to the corporate office, divided into monthly supply amounts, packaged in bags/containers, and then distributed to the facility. Mr. Ubom stated that when he receives the cannabis edibles, they do not contain label information. Mr. Ubom stated that he did not know that the cannabis medication requires label information. Mr. Ubom stated that he would ensure all cannabis medication is properly labeled moving forward.

On 7/31/2023, I conducted an exit conference with Mr. Ubom, via telephone. Mr. Ubom is in agreement with the findings of this report.

APPLICABLE RULE	
R 400.14312	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:	<p>On 6/12/2023, during my onsite investigation at the facility, I observed Resident A and Resident B's medical marijuana gummies were being stored in Ziplock baggies and Tupperware containers. The Ziplock bags and Tupperware containers did not contain label information specifying whom the medication was prescribed to, nor the type and dosage of medication within the containers.</p> <p>According to Mr. Ubom, he was unaware that the cannabis medication needed to be labeled because it comes from a cannabis dispensary. Mr. Ubom stated that he would ensure all cannabis medication is properly labeled moving forward.</p> <p>Based on the information above, there is sufficient information to confirm that the facility is not ensuring that Resident A's and Resident B's prescribed cannabis medication contains label information.</p>
CONCLUSION:	VIOLATION ESTABLISHED

IV. RECOMMENDATION

I recommend the status of the license remains unchanged upon receipt of an acceptable corrective action plan.

Stephanie Gonzalez

8/3/2023

Stephanie Gonzalez
Licensing Consultant

Date

Approved By:

Denise Y. Nunn

08/29/2023

Denise Y. Nunn
Area Manager

Date