



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN, DPA
DIRECTOR

May 28, 2024

Kristi Fleischfresser
Pleasant Lake Lodge, Inc.
2085 S. 33 1/2 Mile Rd.
Cadillac, MI 49601

RE: License #: AL830300832
Investigation #: 2024A0009025
Pleasant Lake Lodge South

Dear Ms. Fleischfresser:

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 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 (616) 356-0100.

Sincerely,

A handwritten signature in cursive script that reads "Adam Robarge".

Adam Robarge, Licensing Consultant
Bureau of Community and Health Systems
Suite 11
701 S. Elmwood
Traverse City, MI 49684
(231) 350-0939

Enclosure

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

I. IDENTIFYING INFORMATION

License #:	AL830300832
Investigation #:	2024A0009025
Complaint Receipt Date:	05/02/2024
Investigation Initiation Date:	05/02/2024
Report Due Date:	06/01/2024
Licensee Name:	Pleasant Lake Lodge, Inc.
Licensee Address:	2085 S. 33 1/2 Mile Rd. Cadillac, MI 49601
Licensee Telephone #:	(231) 920-9993
Licensee Designee/Admin.:	Kristi Fleischfresser
Name of Facility:	Pleasant Lake Lodge South
Facility Address:	2085 S 33 1/2 Mile Road Cadillac, MI 49601
Facility Telephone #:	(231) 775-5847
Original Issuance Date:	11/06/2009
License Status:	REGULAR
Effective Date:	07/23/2023
Expiration Date:	07/22/2025
Capacity:	20
Program Type:	MENTALLY ILL & AGED

II. ALLEGATION(S)

	Violation Established?
Adam Harris was allowed to live on-site and work at the facility even though the licensee designee believed he would not pass a criminal history check. He was not suitable to be around the residents of the home due to his criminal history.	Yes
The licensee designee was aware of heroin use by direct care staff and did nothing to intervene.	No
Some direct care workers did not have a statement signed by a licensed physician or his or her designee attesting to the physician's knowledge of the physical health of direct care staff and other employees.	Yes
Additional Finding	Yes

III. METHODOLOGY

05/02/2024	Special Investigation Intake 2024A0009025
05/02/2024	Special Investigation Initiated – Telephone call made to former home manager Amber Harris
05/03/2024	Inspection Completed On-site Interview with direct care worker Christopher Larive, licensee designee Kristi Fleischfresser and husband Anthony Fleischfresser
05/07/2024	Contact - Face to Face interview and document retrieval from former home manager Amber Harris
05/15/2024	Contact – Telephone call made to Adam Harris
05/16/2024	Contact – Telephone call made to direct care worker Deanna Gillett
05/17/2024	Contact – Telephone call made to direct care worker Megan Reffitt
05/20/2024	Contact – Telephone call made to direct care worker Beverly Dusa
05/20/2024	Contact – Telephone call made to Katelyn VanAppel, Munson Urgent Care
05/20/2024	Contact – Telephone call made to direct care worker Megan Reffitt

05/20/2024	Contact – Telephone call made to Rebecca Gossman, nurse at Wexford County Health Department
05/20/2024	Contact – Telephone call made to Ellie, Cadillac Family Physicians
05/20/2024	Contact – Telephone call made to direct care worker Beverly Dusa
05/21/2024	Inspection Completed On-site Interviews with direct care workers Stacey DeBolt and Baylee McKinley
05/22/2024	Contact – Telephone call made to licensee designee Kristi Fleischfresser
05/22/2024	Contact – Document (email with attachments) received from licensee designee Kristi Fleischfresser
05/23/2024	Contact – Documents (emails with attachments) received from licensee designee Kristi Fleischfresser
05/28/2024	Contact – Document (email with attachments) received from licensee designee Kristi Fleischfresser
05/28/2024	Exit conference with licensee designee Kristi Freischfresser

ALLEGATION: Adam Harris was allowed to live on-site and work at the facility even though the licensee designee believed he would not pass a criminal history check. He was not suitable to be around the residents of the home due to his criminal history.

INVESTIGATION: I spoke with former home manager Amber Harris by telephone on May 2, 2024. She stated that when she was the home manager for the facility, she and her husband Adam Harris lived there as well. She said that she told licensee designee Kristi Fleischfresser that Mr. Harris would not pass a criminal history check due to a domestic violence conviction on his record. A criminal history check was never completed on him. Ms. Fleischfresser allowed him to live there as well as work at the facility. He often worked the night shift from 8:00 p.m. to 7:30 a.m. and was the only staff on-duty at that time. He worked just about every Friday night and sometimes Saturday night for about six months. Mr. Harris also transported residents and picked up resident medications during that time. She said that Mr. Harris would attest to that as well as other staff. Ms. Fleischfresser never had a criminal history check completed on him during the time he lived or worked at the facility. Ms. Fleischfresser reportedly knew that he shouldn't be working there and even paid the hours he worked to her, Amber Harris, to try to hide his employment. Ms. Harris stated that she took some of the past work schedules from

the facility, which Ms. Fleischfresser had prepared, to prove that Mr. Harris had worked at the facility. She wanted to be able to provide that and other documentation she had directly to me.

I conducted an unannounced site visit at the Pleasant Lake Lodge South adult foster care home on May 3, 2024. I spoke with direct care worker Christopher Larive at that time. He said he knew that former home manager Amber Harris had been fired from employment at the facility and evicted from living there. Ms. Larive said that he also knew that both Ms. Harris and her husband were facing criminal charges for vandalizing the facility. They are alleged to have caused several thousand dollars of damage there. He believed this complaint was related to the fact that law enforcement had recently “caught up” with Ms. Harris. I asked him about the report that Mr. Harris had lived and worked at the facility. He said that he knew Mr. Harris had lived there with Amber Harris when she had lived and worked there. He said that he did not know specifically about Mr. Harris working the midnight shift. He said that he did know Mr. Harris took out the garbage at the facility but couldn’t say that he covered work shifts there for sure.

Licensee designee Kristi Fleischfresser arrived with her husband at the facility while I was speaking with Mr. Larive. I spoke with Ms. Fleischfresser and her husband at that time. Mr. and Ms. Fleischfresser reported that there was a court hearing the next week regarding Ms. Harris vandalizing the living quarters attached to the Pleasant Lake Lodge South adult foster care home. Ms. Fleischfresser said that Ms. Harris had been a good worker for a long time but got involved with using illicit drugs herself at the end. I asked about Mr. Harris living at the apartment. Ms. Fleischfresser stated that Mr. Harris “couldn’t pass a background check”. She said that she did run a background check on Mr. Harris in 2014 and admitted he did not pass it. Ms. Fleischfresser denied that she has documentation of that because Ms. Harris “stole a bunch of files” before she left. She went on to say that Mr. Harris wasn’t supposed to be living there but Ms. Harris kept taking him back in to live with her. Ms. Fleischfresser admitted that Mr. Harris lived there “off and on” through the years since 2014. I asked her about the report that Mr. Harris also worked at the facility. She said that he did “cover a couple of night shifts”. Ms. Harris would sometimes have him do bed checks or other things at the facility. Mr. Fleischfresser said that they did “try to keep him out of there”. I asked Ms. Fleischfresser why Mr. Harris did not pass the criminal history background check. She said that she did not know why he did not pass it. Mr. Fleischfresser stated that his guess would be for larceny. He said that Mr. Harris is a well-known thief. Mr. and Ms. Fleischfresser also reported that Ms. and Mr. Harris were also fighting all the time at the apartment during the last couple of months. Law enforcement was called to the home on at least three different occasions in November and December of 2023 because of domestic violence between Mr. and Ms. Harris. Ms. Fleischfresser had already terminated Ms. Harris’ employment by that time but Ms. Harris refused to leave the apartment. They had to go through an eviction process and were finally able to get her out of the apartment on December 6, 2023. Ms. Fleischfresser said that she wanted me to be aware that none of the residents were ever harmed during the

episodes of domestic violence that occurred at the apartment. Ms. Fleischfresser said that she, herself, would leave the facility at around 4:00 p.m. and trusted Ms. Harris to manage the facility for her. She discussed Ms. Harris stealing paperwork from her office saying that when Ms. Harris realized she was in “legal jeopardy” she tried to “dig up dirt” on her, Ms. Fleischfresser.

I met with Ms. Harris in person on May 7, 2024, to receive documentation she had obtained which she said would help prove her assertions. These documents included what appeared to be work schedules which were inside plastic protectors like what one might see in a facility for staff use. Some of these work schedules were color-coded. Ms. Harris said that the color-coded documents were the original schedules that Ms. Fleischfresser had prepared and posted for staff. Ms. Fleischfresser was the only person who created these schedules. Ms. Harris indicated that “Adam” was listed as working several shifts on the schedules. She indicated that her husband is the only Adam that worked there.

I spoke with Adam Harris by telephone on May 15, 2024. He reported that he lived at the Pleasant Lake Lodge South facility off and on for several years. He said that he had lived there about five years ago but had moved out. Ms. Harris had then moved out to be with him. Ms. Fleischfresser asked her to come back but she told her that she would only do that if Mr. Harris was allowed to come with her. He said that Ms. Harris reminded Ms. Fleischfresser that he, Mr. Harris, had a criminal history. Ms. Fleischfresser told her that she was aware of that. Mr. Harris shared with me that he has been convicted of domestic violence six times, the last conviction being about six years ago. He said that he also had a drug conviction on his record. Mr. Harris denied that he ever went through the process of being fingerprinted or gone through the AFC (adult foster care) criminal background check at the Pleasant Lake Lodge. He told Ms. Fleischfresser right from the beginning that he had a criminal history. Mr. Harris stated that he lived at the Pleasant Lake Lodge South facility but worked at both the North and South location. He said he completed actual overnight shifts by himself at the North location. He added that there was a live-in staff there as well at the time who was sleeping during his shift. He also often did “bed checks” at the South location in which he would check in on the residents while they were sleeping to make sure they were okay. He said that he also transported residents from both the South and North locations. Mr. Harris said that he only transported male residents since Ms. Harris didn’t want to chance a female resident making an allegation against him. Mr. Harris said that he cooked for residents at both the North and South location on several occasions. He also took out the trash and did recycling at both facilities. He said that Ms. Fleischfresser was aware of him working. Mr. Harris said that Ms. Fleischfresser knew that he wasn’t supposed to be working there because of him not having a criminal history check. She paid him in cash in the beginning but then told him it was just too much cash to be handling and started exchanging his work for rent. She also would put some of his hours on Ms. Harris’ paycheck so that there was no record of him working.

I reviewed the work schedules provided by Ms. Harris which covered June 2023 through September 2023. I noted that “Adam” was on the schedule on Friday nights from 8 p.m to 12 a.m. and Saturday morning from 12 a.m. to 8 or 10 a.m. It also indicated on the line for “Adam” that he was to “bake/cln kitchen” on some days. Although they were not labeled as such, I was able to determine that these schedules were actually for the North location.

I spoke with direct care worker Deanna Gillett by telephone on May 16, 2024. I asked her about Adam Harris. She said that she knew that he lived at Pleasant Lake Lodge South with his wife. She said that she knew he worked the night shift on Fridays at the North location and transported residents from both the North and South location. Ms. Gillett knew that he worked the night shift there because she saw him come in after her own shift. Ms. Gillett said that she was the live-in staff at the North location at that time so knew who was working at all times. Ms. Gillett said that Mr. Harris also did bed checks at the South location while his wife was sleeping.

I spoke with direct care worker Megan Reffitt by telephone on May 17, 2024. She reported that she had worked at the Pleasant Lake Lodge South facility for over a year. I asked her about the report of Adam Harris living and working at the facility. Ms. Reffitt stated that she did not work the midnight shift and did not see him working at that time. She said that she also only works at the South location and wouldn’t know specifically when he worked at the North location. Ms. Reffitt did say that she knew that he cooked meals for the residents at the South location. She saw him cooking there during those times. She denied that she knew if he had transported residents or not.

I spoke with direct care worker Beverly Dusa by telephone on May 20, 2024. She reported that she had been working at the facility for quite some time. I asked her about Adam Harris. She said that he lived and sometimes worked at the facility. She said that he worked the Friday overnight shift at the North facility. He did yard work and she knew that he cooked for residents at both the North and South facilities. Ms. Dusa reported that she, herself, works at the North facility almost exclusively now but when she started she did work some shifts at the South facility.

I spoke again with licensee designee Kristi Fleischfresser by telephone on May 22, 2024 for some further clarification. I asked her again about her statement that she had completed a criminal history check on Adam Harris. She said that she did but that it was so long ago that she had no record of it. Ms. Fleischfresser stated that she searched her facility Workforce Background Check on-line program but could find no record for Adam Harris or her check on him. She said that she recalled that he was “Not Eligible” at the time she did the check on him but that the system gave her a date in which he could “reapply”. Ms. Fleischfresser admitted he should not have been living or working at the facility. She said that if they were short-staffed Ms. Harris would put him on the work schedule. She said that some of the work he did was at the Pleasant Lake Lodge South facility because Ms. Harris “wasn’t doing anything” as home manager there.

APPLICABLE RULE	
MCL 400.734b	Employing or contracting with certain individuals providing direct services to residents; prohibitions; criminal history check; failure to conduct criminal history check.
	(2) Except as otherwise provided in this subsection or subsection (6), an adult foster care facility shall not employ or independently contract with an individual who has direct access to residents until the adult foster care facility or staffing agency has conducted a criminal history check in compliance with this section or has received criminal history record information in compliance with subsections (3) and (11).
ANALYSIS:	<p>Adam Harris either did not have a criminal history check completed or did have one completed in which indicated he was "Not Eligible" to work in a licensed adult foster care facility. Ms. Fleischfresser could not provide evidence that she completed a criminal history check on Mr. Harris. She was aware of him either not having a criminal history check or not being eligible to work in that setting. Mr. Harris reportedly cooked for residents at the facility, did bed checks on sleeping residents, transported residents and did work around the residents including taking out the trash and yard work.</p> <p>It was confirmed through this investigation that Ms. Fleischfresser did employ Mr. Harris without having completed a criminal history check or that she allowed him to work there while being ineligible to work in that setting.</p>
CONCLUSION:	VIOLATION ESTABLISHED

APPLICABLE RULE	
R 400.15201	Qualifications of administrator, direct care staff, licensee, and members of household; provision of names of employee, volunteer, or member of household on parole or probation or convicted of felony; food service staff.
	(10) All members of the household, employees, and those volunteers who are under the direction of the licensee shall be suitable to assure the welfare of residents.

ANALYSIS:	<p>Adam Harris either did not have a criminal history check completed or did have one completed in which indicated he was “Not Eligible” to work in a licensed adult foster care facility. Ms. Fleischfresser could not provide evidence that she completed a criminal history check on Mr. Harris. She was aware of him either not having a criminal history check or not being eligible to work in that setting. Mr. Harris had reportedly cooked for residents at the facility, did bed checks on sleeping residents, transported residents and did work around the residents including taking out the trash and yard work. He also lived in the attached apartment as a member of the household.</p> <p>It was confirmed through this investigation that Ms. Fleischfresser did employ and allowed Mr. Harris to live at the facility. She did this without having completed a criminal history check on him or knowing him to be ineligible to live and work in the home.</p>
CONCLUSION:	VIOLATION ESTABLISHED

ALLEGATION: The licensee designee was aware of heroin use by direct care staff and did nothing to intervene.

INVESTIGATION: I spoke with former home manager Amber Harris on May 2, 2024. She reported that a former direct care worker, Jeffrey Friess, had used heroine while working at the facility. She had known this because a hospice nurse who had been at the facility had told her that she found Mr. Friess asleep in his car while on-duty and was unable to wake him up. Ms. Harris did not recall the name of the nurse since so many come and go from the facility. She also reported that another staff found a cap to a syringe needle in a staff bathroom around the same time. Ms. Harris believed that it belonged to Mr. Friess and stated that once, Mr. Friess took the facility van to obtain illicit drugs from downstate. When Ms. Fleischfresser found out he had taken the van without permission, she called law enforcement on him. Ms. Harris said that she, herself, observed Mr. Friess in his car at the facility with drug paraphernalia for using heroine in October of 2023. She said that she told licensee designee Kristi Fleischfresser about seeing this a week later. She said that Ms. Fleischfresser did later terminate Mr. Friess’ employment, but it was for a different reason. Ms. Harris stated that another staff, Angela Adams, died from an accidental overdose of heroine although this did not happen at the facility. It was alleged that Mr. Friess had supplied Ms. Adams with the heroine which killed her. Ms. Harris denied that she knew of any theft of resident narcotics from the facility. She said that Mr. Friess was obtaining the heroine from elsewhere and bringing and using it at the facility. Ms. Harris also said that she only knew of Ms. Adams and Mr. Friess being under the influence of illicit drugs while working at the facility.

I spoke with direct care worker Christopher Larive during my unannounced site visit to the facility on May 3, 2024. I asked him about the report of former direct care worker Jeffrey Friess using illicit drugs while working at the facility. Mr. Larive stated that he did work with Mr. Friess quite a bit when they were both employed there. He said that Mr. Friess “did his job”. Mr. Larive denied that he ever knew Mr. Friess to use drugs while on the job. He also denied seeing any signs of illicit drug use at the facility by Mr. Friess or anyone else. Mr. Friess did not appear to be under the influence when he was working. He remembered that Mr. Friess would just be “on his phone” during his breaks. There was no concerning behavior on the part of Mr. Friess and never any indication that resident medications were missing.

During my site visit on May 3, 2024, I asked licensee designee Kristi Fleischfresser about her knowledge of drug use by employees at the facility. She said that there was illicit drug use by a few employees at the facility. There was never any indication that any medication was taken from residents and the illicit drugs were brought from outside the facility. Ms. Fleischfresser had no indication of employee drug use before direct care worker Angela Adams’ overdose death during the summer of 2023. She found out later that Mr. Friess was also involved in illicit drug use. She had some of the employees who worked for her do a drug test including Ms. Harris. She found out later that Ms. Harris had used her own child’s urine to beat the drug test. She also found out later that Ms. Harris was involved and allowed direct care worker Jeffrey Friess to take the company van to Grand Rapids to pick up drugs. She did not have proof of Mr. Friess’ drug use until Ms. Harris told her about Mr. Friess “overdosing” in the parking lot of the facility while on-duty. Ms. Harris did not inform her of this happening until two weeks after it occurred. Ms. Fleischfresser said that she did terminate Mr. Friess’ employment as soon as she was notified of that information.

I spoke with direct care worker Deanna Gillett by telephone on May 16, 2024. I asked her about her knowledge of illicit drug use by other employees at the facility. She said that she did not know of Angela Adams’ drug use until she died of the overdose. She did not know of Jeffrey Friess’ drug use until she heard about him being found in the parking lot of the facility with drug paraphernalia. She had worked with Mr. Friess on several occasion and did know him to often arrive late for his shift. She said that she did suspect him of possibly being under the influence of something one or two times. Ms. Gillett stated that she did not tell Ms. Fleischfresser of her suspicion.

I spoke with direct care worker Megan Reffitt by telephone on May 17, 2024. I asked her about the report that some staff were using illicit substances while working at the facility. Ms. Reffitt stated that she found out about this “after the fact”. She said that she had her own suspicions about some of the staff being under the influence before it came out, but it was not enough to share with anyone. Ms. Reffitt said that this all came out when Ms. Fleischfresser was trying to get Mr. and Ms. Harris out of the living quarters there. She said that she didn’t think that Ms. Fleischfresser knew anything about the drug use before it all came out. Ms. Reffitt

said that she did not know why it all came out when it did but that it all centered around former direct care worker Jeffrey Friess. Mr. Friess didn't show up a lot to work and would often leave work during his shift. Ms. Reffitt knew that Ms. Fleischfresser did have some of the staff drug tested at one point.

I spoke with direct care worker Beverly Dusa by telephone on May 20, 2024. I asked her about the report of illicit drug use by staff at the facility. She said that she had heard about hard drug use by some of the staff. She said that it was only hearsay. She said that she did work with Mr. Friess. She said that he would leave in the middle of his shift sometimes saying that he had to go take care of his mother. One time, he never came back and told her that he fell asleep in a chair. Ms. Dusa said that she couldn't tell that he was using drugs other than his poor work habits. She denied that she had information that Ms. Fleischfresser allowed Mr. Friess to continue working after knowing of him using illicit drugs on the job.

I spoke again with Ms. Fleischfresser by telephone on May 22, 2023. I asked her specifically how long Mr. Friess had continued to work at the facility after Ms. Harris had told her about finding him in the parking lot with drug paraphernalia. She said that she did not remember the exact date but would get that for me. She said that she knew that she asked Mr. Friess, Ms. Harris and some other employees to get drug tested immediately after being told that information. The tests all came back negative although she later found out that Ms. Harris had used someone else's urine for her own test. She also suspected that Ms. Harris tipped Mr. Friess off about the test. She clarified that the van incident had occurred before that, but she did not know it was used to get drugs until after this later information came out. She said that Mr. Friess and Ms. Harris used the facility van to get drugs in Grand Rapids but "blew it up" down there. They were able to get it towed back but left it in the facility parking lot as if they knew nothing about it. She did not know it had been taken to Grand Rapids or why at the time.

On May 22, I received an email from licensee designee Kristi Fleischfresser. The first attachment in the email appeared to be a drug test result for former direct care worker Jeffrey Friess. The second attachment appeared to be a text exchange between her and Mr. Friess. In the text it appears that Ms. Fleischfresser terminated Mr. Friess' employment on October 9, 2023. She references just finding out about "what happened" on Wednesday (October 4, 2023). This is likely in reference to him being found in the parking lot with drug paraphernalia.

APPLICABLE RULE	
R 400.15201	Qualifications of administrator, direct care staff, licensee, and members of household; provision of names of employee, volunteer, or member of household on parole or probation or convicted of felony; food service staff.

	(10) All members of the household, employees, and those volunteers who are under the direction of the licensee shall be suitable to assure the welfare of residents.
ANALYSIS:	<p>Former direct care worker Jeffrey Friess was reportedly found in the parking lot of the facility in October of 2023 with drug paraphernalia during his work shift. Former home manager Amber Harris reported finding him there and telling licensee designee Kristi Fleischfresser about it a week later. Ms. Fleischfresser acknowledged that she was told this information after the fact but said that she addressed it immediately. She said that she asked Mr. Friess and other staff she suspected of possible drug use to take a drug test. Ms. Fleischfresser also provided me what appeared to be a text exchange in which she terminated Mr. Friess' employment less than a week after he was found in the parking lot with drug paraphernalia. This is consistent with Ms. Harris' account that she found Mr. Friess in the parking lot with the drug paraphernalia in October of 2023 and told Ms. Fleischfresser about a week later.</p> <p>It was confirmed through this investigation that Ms. Fleischfresser acted soon after she found out about suspected drug use by an employee. She asked for that employee and some other employees to take drug tests. She also terminated Mr. Friess' employment soon after finding out about it as evidenced by her text messages with him at that time.</p>
CONCLUSION:	VIOLATION NOT ESTABLISHED

ALLEGATION: Some direct care workers did not have a statement signed by a licensed physician or his or her designee attesting to the physician's knowledge of the physical health of direct care staff and other employees.

INVESTIGATION: I spoke with former home manager Amber Harris on May 2, 2024. She reported that licensee designee Kristi Fleischfresser would forge doctor's signatures on Medical Clearance Request (BCAL-3704) forms and also direct her, Ms. Harris, to forge them. Ms. Harris had observed her just signing the form where the physician or his/her designee is supposed to sign attesting to the physician's knowledge of that employee's physical health. She said that Ms. Fleischfresser had also directed her, Ms. Harris, to sign some of these statements. Ms. Harris said that she would just "make some loops and squiggles" similar to how a doctor's signature might appear. Ms. Harris said that she signed her own medical clearance request form as well as a form for direct care workers Jeff Friess and Megan Reffitt. In each of these instances, Ms. Fleischfresser directed her to sign the form.

I spoke with direct care worker Christopher Larive during my unannounced site visit to the facility on May 3, 2024. I spoke about the requirement that every employee have a medical clearance request form signed by a doctor. I asked him if he had gone to a physician when his employment there began. Mr. Larive said that he had in 2020 or 2021. He had seen his physician, Dr. Soomin Han, who had signed his medical clearance form saying that he could work at the facility.

I spoke with licensee designee Ms. Fleischfresser on May 3, 2024 at the Pleasant Lake Lodge adult foster care home. I asked her about the report that she forged doctor's signatures on the medical clearance request forms or directed Ms. Harris to sign them. Ms. Fleischfresser denied that was true. I asked for Ms. Harris' medical clearance request in which she had reported she had forged the signature at Ms. Fleischfresser's direction. Ms. Fleischfresser provided a Medical Clearance Request (BCAL-3704) form dated November 14, 2019. I noted that the original facility name at the top had been scribbled out and "Pleasant Lake Lodge" written in. The license number and address were of a different facility, not associated with the Pleasant Lake Lodge facilities. Ms. Fleischfresser explained that it was a medical clearance request form that Ms. Harris brought with her from a previous adult foster care home. We discussed that it looked as if the 9 in 2019 had been changed from a 7 to a 9. Mr. and Ms. Fleischfresser agreed that it appeared that way. I noted an illegible signature in the "Licensed Physician or his/her designee Signature" field. Ms. Fleischfresser continued to look through Ms. Harris' file and stated that if another medical clearance request had been completed for her, Ms. Harris had taken it with her. I asked about the report that Ms. Harris had also forged the doctor's signature on Jeffrey Friess' medical clearance request form at the direction of Ms. Fleischfresser. Ms. Fleischfresser looked through Mr. Friess' file and stated that there was no medical clearance request form for him. She said that Ms. Harris must have taken that form with her as well. I asked about direct care worker Megan Reffitt's medical clearance request form which was the third form which Ms. Harris said she had forged at Ms. Fleischfresser's direction. I noted another illegible signature in the "Physician's Signature" field. I also noted that the date also looked as if it had been changed, in this case from "1/19/23" to "1/19/24" or vice versa. Ms. Fleischfresser agreed that this date also looked as if it had been changed. She reported that Ms. Reffitt's hire date was January 2, 2023.

On May 7, 2024, former home manager Amber Harris provided me with several Medical Clearance Request forms which she had taken from the facility while she was still employed there. She reported that these were some of the forms which had been forged. I noted that the two of these forms were for former direct care worker Jeffrey Fries. The first was dated April 13, 2019. There was a stamp on the form for the Wexford County Health Department, 521 Cobbs St., Cadillac. Ms. Harris pointed out that the stamp was for the TB section of the form, not the physical exam portion. None of the boxes were checked including "No physical/mental condition or health problem exists that would limit the ability to work with or around dependent adults". The signature in the Physician's Signature field was illegible but the address below the signature was written in as 521 Cobb Street, Cadillac. The second Medical

Clearance Request form for Mr. Friess did have the “No physical/mental condition or health problem exists...” box checked but no signature at all in the “Physician’s Signature” field. The address on this second form was also 521 Cobb St., Cadillac. Ms. Harris also provided me with two Medical Clearance Request forms for two current employees of the facility. The first was for direct care worker Deanna Gillett dated March 15, 2023. I noted that the box was checked for “No physical/mental condition or health problem exists...” In the “Physician’s Signature” field was written “Health Dept. Nurse” with no signature. The address was 521 Cobb St., Cadillac. The second Medical Clearance Request form for a current employee was for Beverly Dusa an “Examination Date” of November 6, 2022 and “Signature Date” of November 8, 2022. None of the boxes were checked that would indicate whether the employee has a physical/mental or health condition or not. I noted an illegible signature with no street address. The phone number on the form is for Cadillac Family Physicians. Ms. Harris stated that this last form is the one which Ms. Fleischfresser signed herself. She said that she witnessed her sign it.

I spoke with direct care worker Deanna Gillett by telephone on May 16, 2024. I asked her about her being seen by a physician for a physical exam within 30 days of her initial employment. Ms. Gillett said that she did not remember that specifically but that her primary physician is with Amanda’s Family Medicine. I told her that the Medical Clearance Request form provided to me had “Health Dept. Nurse” written in where the physician is supposed to sign. Ms. Gillett stated that she knew for sure that she did not receive a physical exam by the Health Department. She said that she would have only gotten her TB test done there.

I spoke with direct care worker Megan Reffitt by telephone on May 17, 2024. I asked her about the requirement that each new employee have a physician sign that they have no physical/mental or health problems that would limit their ability to work with or around dependent adults. Ms. Reffitt denied that she remembered going to a doctor for a physical. She said that she did remember going to the Health Department for a TB test. Ms. Reffitt said that if she had gone for a physical it would have been at the Urgent Care located by the hospital. Ms. Reffitt said that is the only place she goes for medical care. She did not remember going there as a requirement for this job, though.

I spoke with direct care worker Beverly Dusa by telephone on May 20, 2024. I asked her about the requirement that new employees have a properly completed Medical Clearance Request form with includes a physician attesting to their physical and mental health. She said that she recalled going to the Health Department for a TB test but could not remember ever having a medical exam or anything like that for the job. She said that if she did have a medical exam, it would have been at the Cadillac Family Physicians where she has a primary doctor.

I spoke with Katelyn VanAppel with Munson Urgent Care, which is the urgent care facility located near the Cadillac Hospital. I asked Ms. VanAppel about a direct care worker possibly having a physical exam performed there. Ms. VanAppel reported

that they do not perform physical exams there because patients do not have primary doctors there. She reported that she was certain that a physical exam would not have been performed there and no one would have signed a Medical Clearance Request form from their office.

I contacted direct care worker Megan Reffitt by telephone on May 20, 2024. I told her what I had been told by Munson Urgent Care. Ms. Reffitt said that Munson Urgent Care is the only place she goes for medical care and that she does not have a primary physician. She said that that is the only place she would have gone if she had gotten a physical exam for work. She said that she also knew that she had only gone to the Health Department for her TB test and did not have a physical exam there.

I spoke with Rebecca Gossman who is a nurse at the Wexford County Health Department by telephone on May 20, 2024. I explained the AFC Licensing requirement that each new employee have a health statement signed by a physician within 30 days of their employment. Ms. Gossman stated that she is familiar with the Medical Clearance Request form and the requirement. Ms. Gossman reported that a signed Medical Clearance Request form would have never come from them. She said that they do not perform any kind of physical exam there. She said that they only perform TB tests there. Ms. Gossman said that she knew that because she is the one who does the TB tests and fills out the section of the Medical Clearance Request form which includes TB test information. She knew that there is nowhere for a signature in the TB section of the form and would not have signed below where the physician is to sign. She would not have filled out the other section of the form which is for the physician or their representative to fill out. Ms. Gossman stated that she knew for sure that no one else at the Health Department would have filled that out either. Ms. Gossman said that she has been asked several times by new employees if she would fill out that additional section and has told them that they do not do that there. She has referred them to their primary physician for that on each occasion. Ms. Gossman said that she could confirm that no physicals would have been performed by Health Department in the last year and a half or even before that.

I contacted Ellie with Cadillac Family Physicians by telephone on May 20, 2023. She reported that she could only provide medical information to the patient themselves and would be happy to do that if they contacted her.

I spoke again with direct care worker Beverly Dusa on May 20, 2024. We spoke about her Medical Clearance Request form having November 6, 2022 in the "Examination Date" field. I told her that none of the boxes had been checked where the physician is supposed to address the employee's health. Ms. Dusa contacted Ellie with Cadillac Family Physicians and then contacted me back. She said that she had not been seen by her doctor on November 6, 2022 or even anytime around that date. Ms. Dusa said that she had only been seen by her doctor in February and August of 2022. There was no record of them having filled out the Medical Clearance Request form.

I conducted an unannounced site visit at the Pleasant Lake Lodge South adult foster care home on May 21, 2024. I spoke with direct care worker Stacey DeBolt at that time. She said that she had been working at the facility since January of 2024. I asked her about having a physical exam when she was a new employee or knowing about her physician signing the Medical Clearance Request form regarding her health status during her initial 30 days of employment. Ms. DeBolt replied that she knew that she had gone to the Health Department for a TB test when she was new but that was all she recalled. She said that she did have her annual physical exam by her primary physician in April of 2024 but did not go to her doctor in January or February of that year.

I also spoke with direct care worker Baylee McKinley during the time of my site visit on May 21, 2024. She said that she had worked at the facility since November or December of 2023. I asked her about having a physical exam or having a doctor fill out a Medical Clearance Request form for her during her initial 30 days of employment. Ms. McKinley replied that she only got a TB test and had her fingerprints (criminal history check) done. She never went to a doctor or a nurse practitioner for a physical. Ms. McKinley said she was sure of that. She said that she just recently got a new doctor at Family Physicians so she knows that she did not have a physical exam completed when she was a new employee. There was no one who would have signed the Medical Clearance Request form attesting to her health when she was a new employee.

I spoke again with licensee designee Kristi Fleischfresser by telephone on May 22, 2023. I told her that Medical Clearance Request forms she had supplied to me and the ones that Ms. Harris had supplied to me all had the address, and sometimes phone number, for the Wexford County Health Department. I told her that I confirmed that the Health Department does not perform physical exams and would not have checked any of the boxes regarding the employee's health condition. She said that she did know that her employees went to the Health Department for TB tests. She said that she has sent some of her employees to the Cadillac Hospital "Occupational Health" department for some physical exams. I asked if she could provide documentation of that. She said she did not know if she could because Ms. Harris had taken all the files. We discussed that Ms. Harris taking some of the records was an unusual circumstance but that it occurred several months ago. There was an expectation that she would be in the process of trying to replace the records that were taken if they are required documents. Ms. Fleischfresser pointed out that she could do that for current employees but would not be able to do that for past employees.

APPLICABLE RULE	
R 400.15205	Health of a licensee, direct care staff, administrator, other employees, those volunteers under the direction of the licensee, and members of the household.

	<p>(3) A licensee shall maintain, in the home, and make available for department review, a statement that is signed by a licensed physician or his or her designee attesting to the physician's knowledge of the physical health of direct care staff, other employees, and members of the household. The statement shall be obtained within 30 days of an individual's employment, assumption of duties, or occupancy in the home.</p>
<p>ANALYSIS:</p>	<p>I received copies of Medical Clearance Request (BCAL-3704) forms for some former and several current direct care workers. None of them seemed to document an actual physical examination except one for former employee Amber Harris which was brought from a previous AFC home she worked at. All the others had an address for the Wexford County Health Department underneath the Physician's Signature field.</p> <p>The Health Department confirmed that they do not perform physical exams and would not in any circumstance have signed that area of the form. Two of the forms had none of the boxes checked for the employee's health. Two other forms had no signatures whatsoever with one having "Health Dept. Nurse" written in.</p> <p>I confirmed with a local urgent care that they do not perform physical exams and another that the direct care worker in question did not have a medical appointment at or around the time of the "Examination Date" indicated on the form.</p> <p>None of the employees interviewed remembered getting a physical exam for the job or having a doctor sign the Medical Clearance Request form for them. One new employee adamantly denied that she had had a physical exam for the job or had a Medical Clearance Request form signed for her.</p> <p>It was confirmed through this investigation that several employees including former home manager Amber Harris, former direct care worker Jeffrey Friess and current direct care workers Deanna Gillett, Megan Reffitt and Beverly Dusa did not have properly documented Medical Clearance Request forms. These forms had no proper physician information documenting that an actual physical exam had been conducted to determine the employee's health. Other employees did not remember having physical exams conducted when they were new or having a medical clearance request form filled out for them.</p>

CONCLUSION:	VIOLATION ESTABLISHED
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ADDITIONAL FINDING: On May 2, 2024, former home manager Amber Harris told me that Ms. Fleischfresser had falsified several employees' training records to make it appear they had completed required training when they had not. I met with Ms. Harris on May 7, 2024. She provided me with documents titled "Training Record" for several employees who work at the Pleasant Lake Lodge Sout adult foster care home. She had observed Ms. Fleischfresser sign these forms as the "Signature of Trainer" and that her signature was "Verifying that the Trainee Met Passing Criterion". Ms. Harris knew that Ms. Fleischfresser had not trained these employees in most or all of these elements or verified any training criteria for them.

I reviewed the three page "Training Record" and noted that the training components include but are not limited to: *'Personal Profiles: Meet the People, Must Know Information: The Basics of Your Job, Documentation, Recipients Rights, Incident Reports, Communication, Recreation and Leisure Time Activities, Cultural Diversity, The Rights of People Living in AFC Homes, The Rights of People Receiving Mental Health Services, Protected Health Information: The Privacy Rule of the HIPAA Act, Fire Safety "Must Know" Information, Smoking Policies and Procedures, Alarm System Features and Operation, Fire Safety Protection Plan, Fire Drills, Evacuation Issues and Actions for Specific People, Fire Safe Practices in the Kitchen and Laundry, Fire Prevention, Maintaining a Fire Safe Home, Vehicle Orientation and Safe Driving Techniques, Safe Driving During Winter Weather, Environmental Emergencies, Body Mechanics and Safe Lifting, Mental Illness and Developmental Disabilities, Working with Older Adults, Alzheimer's Disease and Other Dementias, Depression, Suicide Prevention, Autism Spectrum Disorder, Bloodborne Pathogens and Exposure Control, Taking Vital Signs, Personal Care and Hygiene, Medical and Health Conditions for Specific People, Signs of Illness and What to Do About Them, Eating and Feeding Techniques, Infection Control, Safety Lifting, Moving and Transferring People, Doctor's Appointments and Emergency Room Visits, Diabetes, Seizures, Preventing Pressure Sores, The Basics of Breathing Disorders, Prevention of Challenging Behavior, Reacting to Challenging Behavior, Procedure for Reacting to Extreme Behavior, Introduction to Medications, Medication Administration and Documentation.'*

I spoke with direct care worker Deanna Gillett by telephone on May 16, 2024. I asked her about the report that new employees were not being trained properly in required areas. Ms. Gillett reported that she did not feel that new staff were necessarily being trained properly. She said that when she was new, Ms. Harris told her she could set up medication for residents in cups a half an hour to two hours early. She said that it was only later that a coworker told her she could not do that. I went over the three-page Training Record provided to me indicating that Ms. Gillett had received training on February 16, February 17 and February 18, 2023. I read to her the training she reportedly received on February 16, 2023. She replied, "I was never trained on any of that." I read to her the training she reportedly received on

February 17, 2023. She replied, "I was never trained on any of that." I read to her the training she reportedly received on February 18, 2023. She replied, "I was never trained on any of that on that day or any other day." Ms. Gillett did say that the reason she might not have been trained on the fire safety items was because Ms. Fleischfresser is aware that Ms. Gillett is a firefighter.

I spoke with direct care worker Megan Reffitt by telephone on May 17, 2024. I asked her about the report that at least some staff had not received the training that Ms. Fleischfresser had indicated by signature they had. Ms. Reffitt said that she is the trainer for new staff now so she would remember what training she did and did not receive when she, herself, was new. I told her that I had a copy of the Training Record for her dated January 9, 2023 and January 10, 2023 and signed by Ms. Fleischfresser. I read the training items that she had reportedly received on January 9, 2023. Ms. Reffitt replied, "I don't think that I received any of that training. I learned on the go." I then read the training items that she had reportedly received on January 10, 2023. Ms. Reffitt replied that she did not receive any of the training I had just read off. Ms. Reffitt stated that when she was a new staff person, other staff would just take her along and train her as they went. She said that this worked mostly but that she remembered being left alone in the facility early on and didn't really know the residents or any of their individual needs. Ms. Reffitt said that she really learned what to do there by just asking questions to staff who had been there longer than she had. She said that she tried to use this early experience to train staff now. She said that she will tell them not to tell her "yes" that they understand something if they really don't. I asked Ms. Reffitt specifically what form of training is given to new employees. She replied, "They come on the floor with me". She did say that another staff person provides training specific to medication administration. Ms. Reffitt said that she did not know of any "formal" training like the items I had read off to her being done when she was new or even more recently.

I spoke with direct care worker Beverly Dusa by telephone on May 20, 2024. I told her that I had a copy of her Training Record signed by Ms. Fleischfresser which indicated that she had received training on October 28, October 29, October 30 and November 1, 2022. I read off the training items that she had reportedly received on October 28, 2022. Ms. Dusa replied that she knew of the HIPAA Act from a previous job. She said that she knew that she did not have any training on documentation. She denied that she had received any training on a computer or anything like that. Ms. Dusa said that she learned about medication administration on the job from coworkers. She said that she did not remember ever receiving any of the other training. I then read the training items that she reportedly received on October 29, 2022. Ms. Dusa stated that she did do the blood-borne pathogens training but not any of the fire safety training. She said that she learned where everyone goes during a fire at the time of her first fire drill. I read the training item she reportedly received on October 30, 2022 "Medical and Health Conditions for Specific People". She said that she did not recall receiving that training. I read the training items that she reportedly received on November 1, 2022. She denied remembering ever

receiving any of those trainings. She said that she did know about medication administration from the job but that she did not administer medication herself.

I spoke with direct care worker Stacey DeBolt in person on May 21, 2024. I asked her about the training she received as a new worker. She said that she had two or three weeks of training which included her getting to know the residents and being trained on medication administration. Ms. DeBolt said that she was already familiar with the Medication Administration Record (MAR) system from her previous employment at an AFC home. She denied that she ever received any training on reporting requirements at the Pleasant Lake Lodge but it was possible that Ms. Fleischfresser assumed she knew about that from her previous employment at an AFC home and with Community Mental Health (CMH). She did not recall any training on resident rights but Ms. Fleischfresser might have assumed she knew about that because of her previous employment with CMH. I pointed out that the AFC Licensing resident rights are different than the recipient rights which protect CMH consumers. I then read the training items contained on the first page of the Training Record I had previously been given to Ms. DeBolt. She replied that she did not receive that training. I then read the training items on the second page of the Training Record. She said that the only thing on that page she had been trained on was the fire drills and that was from a coworker during a fire drill. I then read the training items on the third page of the Training Record. Ms. DeBolt said that she had known about medication administration from her previous jobs. She did learn it there again from other staff. She said that she knew some of the training items I had read from her previous jobs but had not really received “training” at the Pleasant Lake Lodge.

I also spoke with direct care worker Baylee McKinley during the time of my site visit on May 21, 2024. She said that she had worked at the facility since November or December of 2023. She denied that she had ever worked at an adult foster care home before. I asked her about her training when she was a new employee. Ms. McKinley replied on her first day she was told to go clean the toilets and follow the “task list”. She said that she would just follow the task list and ask another employee what something meant if she didn’t know. She said that she learned by “getting in trouble” when she didn’t do something right. Ms. McKinley explained that some things are supposed to be done a certain way but she was never told that. I then read the training items on the first page of the Training Record to her. She denied that she was trained on any of those items except the Smoking Policy. I then read the training items on the second page of the Training Record. Ms. McKinley denied that she had been trained on any of those items. She said that she learned how to shower residents from other staff. She said that Ms. Fleischfresser was really busy with a lot of people when she was first hired. She said that Ms. Fleischfresser just asked her questions and then walked her around the facility when she interviewed. Ms. McKinley stated there was no formal training just what she learned from other staff. I then read the training items on the third page of the Training Record. Ms. McKinley replied that she did get trained on any of that. She stated that she does

not administer medication so was likely not trained on that since she does not perform that duty.

I spoke again with licensee designee Kristi Fleischfresser by telephone on May 22, 2023. I told her that several employees told me that they had never been trained on items documented in her own Training Record. She said that she would only skip training someone if they received that particular training elsewhere. Otherwise, they “do the book”. She explained that this was a book they would read that contained the training. Ms. Fleischfresser said that direct care worker Beverly Dusa was mostly kitchen staff so might not have received all the training because of that. She said that she didn’t recall her “doing all of” the training. Ms. Fleischfresser said that she also had previously worked for the school so received some training there before coming to work at Pleasant Lake Lodge. Ms. Fleischfresser said that direct care worker Megan Reffitt previously worked at an AFC home so “had all the training”. She recollected that Ms. Reffitt only had the medication administration training at Pleasant Lake Lodge. Ms. Fleischfresser said that direct care worker Stacey DeBolt came with CMH training although she said she knew she couldn’t count all of their training. I pointed out that she, Ms. Fleischfresser had signed that each “trainee met passing criterion”. She signed this for each employee on each training item. I told her that would lead one to believe that she somehow tested them in some measurable way to “verify passing criterion”. I told her that the AFC Licensing rule does not require an actual written test per se but she must have a method to assure competency. She is also required to maintain written verification of the training. I asked her if she had new employees sign anything saying they received training in required areas. She said no. Ms. Fleischfresser said that she has had employees do a “Tool Box Training” which did include some testing but that Ms. Harris took those files. I told her if she had any evidence of that, she could forward it to me. She also wanted me to know that new staff have “hands-on” training by other staff but she did not have any signatures or documentation of that.

I noted in the work schedules that I received that Beverly Dusa appeared to have been scheduled as a direct care worker on many occasions as well as having some shifts in the “kitchen”.

I received two emails with attachments from licensee designee Kristi Fleischfresser on May 23, 2024. The first email had what appeared to be training tests for “Deanna G.” The first page included a test for how to prepare a resident for a medical appointment and what to bring along with them. The second page was a “Basic Medication Administration Test”. The second email had several pages of what appeared to be training that direct care worker Stacey DeBolt had previously received through Northern Lakes Community Mental Health Authority. It appeared that these trainings had taken place in 2022 and early 2023. Ms. Fleischfresser indicated in the email, “Here is a transcript of trainings for Stacy as well. Because she completed those trainings, I signed off on the other for us.” Several trainings Ms. DeBolt had reportedly completed for CMH had been starred, apparently by Ms. Fleischfresser. These included, *‘Natural Disasters and Workplace Emergencies: An*

Overview, Person-Centered Planning, Recipient Rights Refresher for DCP, Sexual Harassment: What Employees Need to Know, Understanding Workplace Violence, Cultural Competence, Culture of Gentleness, Customer Service Grievance and Appeal, Ethics and Corporate Compliance, Managing Trips, Slips and Falls, About Advance Directives, Accessibility and Accommodations and LEP, Application of HIPAA in Behavioral Health and Bloodborne Pathogens and Infection Control.

I received an email with attachment from licensee designee Kristi Fleischfresser on May 28, 2024. She provided an image of a one-page Medication Administration and Documentation Written Test date January 1, 2020 for former direct care worker Jeffrey Friess. Mr. Friess had apparently answered questions regarding medication administration including ensuring the “Right person, right medication, right dose, right time, right route and right documentation”. He had also answered a question regarding medication administration time-frames at the time of the written test.

APPLICABLE RULE	
R 400.15204	Direct care staff; qualifications and training
	<p>(3) A licensee or administrator shall provide in-service training or make training available through other sources to direct care staff. Direct care staff shall be competent before performing assigned tasks, which shall include being competent in the following areas:</p> <ul style="list-style-type: none"> (a) Reporting requirements. (b) First aid. (c) Cardiopulmonary resuscitation. (d) Personal care, supervision, and protection. (e) Resident rights. (f) Safety and fire prevention. (g) Prevention and containment of communicable diseases.
ANALYSIS:	<p>I was supplied with Training Records for three current direct care workers who work at the facility. Many of the training items were required training or related to required training. These were signed by Ms. Fleischfresser as “Signature of Trainer (Verifying Trainee Met Passing Criterion)”. Current direct care workers Deanna Gillett, Megan Reffitt and Beverly Dusa denied remembering being trained in almost any of those areas on those dates. I spoke with two newer direct care workers. The first, Stacey DeBolt, denied that she had received almost any of that training but stated that she believed Ms. Fleischfresser might have accepted her past training at other AFC homes with training given to her by CMH. The other new employee, Baylee McKinley, said that she did not have any formal training and only learned on the job from other workers when she did something wrong.</p>

	<p>Ms. Fleischfresser did supply me with a past training record for the employee who had worked at CMH. Ms. Fleischfresser admitted that since the employee completed those trainings (through CMH) she “signed off” on the other trainings that she would have otherwise provided. I reviewed those trainings which were specific to CMH and did not necessarily translate to an AFC setting.</p> <p>It was confirmed through this investigation that required training of new employees or proper documentation of this is not being kept. All the employees I interviewed denied having almost any knowledge of having been trained in the areas they were reported to have been trained in. Some reported that they assumed Ms. Fleischfresser might have accepted some of their past training or experience during other employment. There is little to no evidence that the licensee measured competence in the required areas prior to the employees performing assigned tasks.</p>
CONCLUSION:	VIOLATION ESTABLISHED

I conducted an exit conference with licensee designee Kristi Fleischfresser by telephone on May 28, 2023. I told her of the findings of my investigation and gave her the opportunity to ask questions.

IV. RECOMMENDATION

Upon receipt of an acceptable corrective action plan, I recommend no change in the license status.

Adam Robarge

05/28/2024

Adam Robarge
Licensing Consultant

Date

Approved By:

Jerry Hendrick

05/28/2024

Jerry Hendrick
Area Manager

Date