



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

MARLON I. BROWN, DPA  
DIRECTOR

January 30, 2026

Ellen Davis  
Trilogy Health Care of Clinton, LLC  
303 N. Hurstbourne Pkwy  
Louisville, KY 40222-5185

RE: License #: AH190336309  
Investigation #: 2026A1021014  
The Willows at East Lansing

Dear Ellie Davis:

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 authorized representative and a date.

If you desire technical assistance in addressing these issues, please feel free to contact me. In any event, the corrective action plan is due within 15 days. Failure to submit an acceptable corrective action plan will result in disciplinary action. Please review the enclosed documentation for accuracy and contact me with any questions. In the event that I am not available and you need to speak to someone immediately, please contact the local office at (517) 335-5985.

Sincerely,

*Kimberly Horst*  
Kimberly Horst, Licensing Staff  
Bureau of Community and Health Systems  
611 W. Ottawa Street  
Lansing, MI 48909

enclosure

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

**I. IDENTIFYING INFORMATION**

<b>License #:</b>	AH190336309
<b>Investigation #:</b>	2026A1021014
<b>Complaint Receipt Date:</b>	12/22/2025
<b>Investigation Initiation Date:</b>	12/22/2025
<b>Report Due Date:</b>	02/21/2026
<b>Licensee Name:</b>	Trilogy Health Care of Clinton, LLC
<b>Licensee Address:</b>	#2 303 N. Hurstbourne Pkwy Louisville, KY 40222-5185
<b>Licensee Telephone #:</b>	(517) 203-4042
<b>Administrator/ Authorized Representative:</b>	Ellen Davis
<b>Name of Facility:</b>	The Willows at East Lansing
<b>Facility Address:</b>	3500 Coolidge Road East Lansing, MI 48823
<b>Facility Telephone #:</b>	(517) 203-4042
<b>Original Issuance Date:</b>	02/13/2014
<b>License Status:</b>	REGULAR
<b>Effective Date:</b>	08/01/2025
<b>Expiration Date:</b>	07/31/2026
<b>Capacity:</b>	36
<b>Program Type:</b>	AGED

## II. ALLEGATION(S)

	<b>Violation Established?</b>
Employees are not trained.	Yes
Additional Findings	No

## III. METHODOLOGY

12/22/2025	Special Investigation Intake 2026A1021014
12/22/2025	Special Investigation Initiated - Telephone interviewed complainant
01/05/2026	Inspection Completed On-site
01/08/2026	Contact-Document Received Received additional training documents
01/30/2026	Exit Conference

### **ALLEGATION:**

**Employees are not trained.**

### **INVESTIGATION:**

On 12/22/2025, the licensing department received a complaint with allegations medication technicians are not trained.

On 01/05/2026, I interviewed the administrator Ellie Davis at the facility. The administrator reported that employees always begin as a resident care associate (RCA) and then transition to the medication technician role. The administrator reported that the training for a medication technician involves a medication course, and then 1:1 training with a seasoned medication technician. The administrator reported that the medication technician must complete a checklist prior to independently administering medications. The administrator reported that if there are any concerns with the medication technician, additional training and education can be provided. The administrator reported that the facility has nurses that complete nurse training. The administrator reported that their orientation is a little different than the other employees. The administrator reported that the facility has

approximately six medication technicians. The administrator reported that all medication technicians are appropriately trained.

I reviewed medication technician training for two medication technicians. The documentation revealed both technicians successfully completed the training and competency was verified by the facility.

I reviewed SP3's training which was titled *Director of Assisted Living Orientation Checklist*. The training revealed SP3 was trained in Falls, Restraints/Bed Rails, Weights, Wounds, Vitals, Level of Care Documentation.

I reviewed SP3's medication aid procedure checklist. The checklist revealed SP3 was trained in handwashing, glove removal, instillation medication, oral medication, blood pressure. The document revealed SP3 was not trained in sublingual or buccal medication, topical medication, or PRN medication.

<b>APPLICABLE RULE</b>	
<b>R 325.1931</b>	<b>Employees; general provisions.</b>
	<p><b>(6) The home shall establish and implement a staff training program based on the home's program statement, the residents service plans, and the needs of employees, such as any of the following:</b></p> <ul style="list-style-type: none"> <li><b>(a) Reporting requirements and documentation.</b></li> <li><b>(b) First aid and/or medication, if any.</b></li> <li><b>(c) Personal care.</b></li> <li><b>(d) Resident rights and responsibilities.</b></li> <li><b>(e) Safety and fire prevention.</b></li> <li><b>(f) Containment of infectious disease and standard precautions.</b></li> <li><b>(g) Medication administration, if applicable.</b></li> </ul>
<b>ANALYSIS:</b>	Review of SP3's employee training revealed SP3 was not trained on the required topics.
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**IV. RECOMMENDATION**

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

*Kimberly Horst*

01/14/2026

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Kimberly Horst  
Licensing Staff

Date

Approved By:

*Andrea L. Moore*

01/29/2026

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

Date