



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF COMMUNITY & HEALTH SYSTEMS

Shelly Edgerton
DIRECTOR

January 11, 2018

Narconon Freedom Center, SA0130110
Monica Biddle, Program Director
505 Keefer Drive
Albion, MI 49224

SUBJECT: Substance Use Disorder Post Licensure Survey Findings for Narconon Freedom Center

Dear Ms. Biddle

A state post licensure inspection was conducted on December 19, 2017 at Narconon Freedom Center pursuant to Michigan Public Health Code, Act 368 of 1978, Part 62, Section 333.6238, which obligates the department to make at least one visit to each licensed health facility or agency every three years for survey and evaluation for the purpose of licensure.

Participants in the follow-up survey inspection included:

- Ashley White, Treasury Secretary
- Jim Hoyt, Regulator Officer, LARA, State Licensing Section
- Kelly Moore, Regulatory Officer, LARA, State Licensing Section

Based on the state post licensure inspection findings, the Department has determined that Narconon Freedom Center is not in substantial compliance with the following requirements:

R325.14901(2) Counselor

The equivalent of one full-time counselor shall be available for every ten residents.

At the time of the provisional licensure survey on 10/16/2017, the program employed two part-time counselors to meet requirement for the equivalent of one full-time counselor for every ten residents. During the post licensure survey on 12/19/2017, it was noted that one of the part-time counselors had quit working for the program on 11/15/2017 and did not return to the program until 12/12/2017. The program advised that because the counselor had quit during that duration that is the reason that they were unable to remain compliant with the two patients enrolled in their program. Narconon Freedom Center is in substantial non-compliance with R325.14901(2) since

the program is unable to demonstrate how compliance is achieved for counselor staffing.

R325.14905 Treatment Plan

(3) The client shall participate in the development of the treatment plan and its objectives. The nature of this participation shall be described in the client's record.

(4) Review of, and changes in, the treatment plan shall be recorded in the client's case record. The date of the review or change, together with the names of the individuals involved in the review, shall also be recorded. The treatment plan shall be reviewed at least once every 90 days by the program director or his or her designee.

During the state post licensure survey conducted on 12/19/2017, it was noted that the treatment plans did not document the clients' participation in the development of the treatment plan and its objectives and did not document the nature of the participation. Narconon Freedom Center is in substantial non-compliance with R325.14905.

R325.14906 Patient Activities

Ten or more hours per week of scheduled activities shall be available to a client. Included in these activities shall be two or more hours of formalized individual, group, or family counseling for each client. The hours of counseling actually provided should vary according to the needs of the client. There shall be documentation of planned social, educational, and recreational activities consistent with the needs of the client. Activities shall include all clients and shall take place days, evenings, and weekends if clients are present during these times.

During the state post licensure survey conducted on 12/19/2017, it was noted that there was no documentation of patient activities. In addition, since time/duration was not captured for counseling session, it cannot be determined if at least two or more hours of formalized, group or family counseling were available to clients. Narconon Freedom Center is in substantial non-compliance with R325.14906

R325.14908 Support and rehabilitative services.

Rule 908. (1) All of the following support and rehabilitation services shall be available to all clients either internally or through the referral process: (a) Education (b) Vocational counseling and training (c) Job development and placement (d) Financial counseling (e) Legal counseling (f) Spiritual counseling (g) Nutritional education and counseling.

(2) A program shall maintain a current listing of services available on-site and by referral. This listing shall be reviewed with each client as part of the program's orientation procedure.

During the state post licensure survey conducted on 12/19/2017, it was noted that the program had not maintained a current listing of services available on-site and by referral and the program was unable to demonstrate that the service list was reviewed with

each client as part the program's orientation procedure. Narconon Freedom Center is in substantial non-compliance with R325.14908.

Based on the state follow-up licensure inspection findings, the Department has determined that Narconon Freedom Center (SA0130110) is in substantial non-compliance with the MCL 333.6201 through MCL 333.6251 and/or the Michigan Administrative Rules R325.14101 through R325.14928 as applicable. It is imperative that the program continues to work to correct all of the non-compliances. The Department will notify the program separately of any further action.



Kelly Moore, Regulation Officer
Licensing and Regulatory Affairs
State Licensing Section
moorek20@michigan.gov
(P): 517-281-2756
(F): 517-241-3354