

RICK SNYDER GOVERNOR

# DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS BUREAU OF COMMUNITY & HEALTH SYSTEMS

Shelly Edgerton DIRECTOR

May 15, 2017

Narconon Freedom Center, SA0130110 Josh Sowers, Program Director 505 Keefer Drive Albion, MI 49224

SUBJECT: Substance Use Disorder Licensure Survey Findings for Narconon Freedom Center – Follow-Up Survey

Dear Mr. Sowers:

A follow-up state licensure inspection was conducted on May 2, 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.

Based on the follow-up state licensure inspection findings, the Department has determined that Narconon Freedom Center is still 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.

#### R325.14905 Treatment Plan

- (1) A client's social and psychological needs shall be assessed. The areas of concern shall include a determination of all of the following: (a) Current emotional state, (b) Cultural background, (c) Vocational history, (d) Family relationships, (e) Educational background, (f) Socioeconomic status, (g) Any legal problems that may affect the treatment plan.
- (2) A written treatment plan based upon the assessment made of a client's needs shall be developed and recorded in the client's case record. A treatment plan shall be developed as soon after the client's admission as feasible, but before the client is engaged in extensive therapeutic activities. The written treatment plan shall comply with all of the following: (a) Be individualized based upon the assessment of the client's needs and, if applicable, the medical evaluation, (b) Specify those services planned for meeting the client's needs, (c) Include referrals for services that are not provided by

the residential program, (d) Contain clear and concise statements of the objectives the client will be attempting, to achieve, together with a realistic time schedule for their achievement, (e) Define the services to be provided to the client, the therapeutic activities in which the client is expected to participate, and the sequence in which services will be provided.

(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.

### 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.

## R325.14907 Residential Progress Notes

A client's progress and current status in meeting the objectives established in the treatment plan, together with a statement of the efforts by staff members to help the client achieve these stated objectives, shall be recorded in the client's case record for every formal client counseling session. A progress note shall be dated and signed by the individual who makes the entry.

- (2) All progress notes shall be dated and signed by the individual who makes the entry.
- (3) If a client is receiving services at an outside resource, the program shall attempt to secure a written case summary, case evaluation, and other client records from that resource. These records shall be added to the client's case record.
- (4) The ongoing assessment of the client's progress with respect to achieving treatment plan objectives shall be used to update the treatment plan.

Additionally, after speaking with the program director, the program advised that they are no longer administering outpatient services at their facility. Therefore, failure to no longer provide this service has resulted in removal of outpatient from their license as of May 2, 2017.

Based upon the fact that Narconon Freedom Center is still non-compliant at the time of the follow-up site visit, Narconon Freedom Center SA0130110, shall be required to submit written plan of correction. This plan must be submitted to the Regulation Officer, Kelly Moore at <a href="mailto:moorek20@michigan.gov">moorek20@michigan.gov</a> with State Licensing Section by no later than May 29, 2017 and an additional follow-up survey will be conducted.

Kelly Moore, Regulation Officer Licensing and Regulatory Affairs State Licensing Section moorek20@michigan.gov

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