



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

July 9, 2020

Ira Combs, Jr.
Christ Centered Homes, Inc.
327 West Monroe Street
Jackson, MI 49202

RE: License #: AS380016315
Investigation #: 2020A0007023
Brown Street Home

Dear Mr. Combs, Jr.:

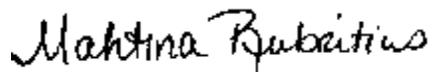
Attached is the Special Investigation Report for the above referenced facility. Due to the violations identified in the report, a written corrective action plan is required. The corrective action plan is due 15 days from the date of this letter and must include the following:

- 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 (313) 456-0380.

Sincerely,



Mahtina Rubritius, Licensing Consultant
Bureau of Community and Health Systems
301 E. Louis Glick Hwy
Jackson, MI 49201
(517) 262-8604

Enclosure

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

I. IDENTIFYING INFORMATION

License #:	AS380016315
Investigation #:	2020A0007023
Complaint Receipt Date:	05/14/2020
Investigation Initiation Date:	05/15/2020
Report Due Date:	07/13/2020
Licensee Name:	Christ Centered Homes, Inc.
Licensee Address:	327 West Monroe Street Jackson, MI 49202
Licensee Telephone #:	(517) 499-6404
Administrator:	Ira Combs, Jr.
Licensee Designee:	Ira Combs, Jr.
Name of Facility:	Brown Street Home
Facility Address:	1203 Brown Street Jackson, MI 49203-2732
Facility Telephone #:	(517) 990-9058
Original Issuance Date:	03/24/1995
License Status:	REGULAR
Effective Date:	11/15/2018
Expiration Date:	11/14/2020
Capacity:	6
Program Type:	PHYSICALLY HANDICAPPED DEVELOPMENTALLY DISABLED MENTALLY ILL

II. ALLEGATION(S)

	Violation Established?
Allegations that Employee #1, Direct Care Staff, used Resident A's name to communicate with prisoners about drug dealing.	Yes

III. METHODOLOGY

05/14/2020	Special Investigation Intake - 2020A0007023
05/14/2020	Contact - Telephone call received- Case discussion with Administrative Staff Member #1.
05/14/2020	Contact - Document Received- Copies of the envelopes, letter, and other documents.
05/15/2020	Special Investigation Initiated – Telephone - Interview with Guardian A.
07/08/2020	Contact - Document Sent- Copy of Police Report Requested.
07/09/2020	Contact - Document Sent- Email to Mr. Combs, Licensee Designee, regarding the exit conference.
07/09/2020	APS Referral

ALLEGATIONS:

Allegations that Employee #1, Direct Care Staff, used Resident A's name to communicate with prisoners about drug dealing.

INVESTIGATION:

Note: Due to the COVID -19 Pandemic, an on-site investigation was not conducted.

As a part of this investigation, I reviewed an incident report authored by Home Manager #1 (HM #1) and the following was noted: On May 14, 2020, shortly after lunch, Resident A went and checked the mail as she normally does. Resident A brought the mail to HM #1 and informed her (HM #1) that she (Resident A) had a big

orange envelope that was sent from Prison #1. HM #1 documented that she and Resident A opened the envelope together and there was a letter addressed to a staff member [Employee #1]. HM #1 informed Resident A that she would need to turn the letter in to the Administrative Staff. The Michigan State Police were contacted, they took a statement, and all of the letters. The Trooper asked Resident A if she knew any of the prisoners listed and she did not. HM#1 was instructed to contact MSP if any more letters were received from the prison.

In the second incident report, Administrative Staff Member #1 (ASM #1) documented that HM #1 brought a letter to the office (in a manilla envelope) which was addressed to Resident A. The letter inside the envelope was addressed to Employee #1, along with some legal papers from a prisoner at Prison #1. Copies of the documents were made, and the appropriate officials were contacted. Employee #1 was terminated.

I also reviewed the documents and noted that the letter was addressed to Employee #1. There were also police reports included in the documents. The letter to Employee #1 instructed her on how to mark the paperwork, and to trust him (the writer from prison) that “they will never catch on.” It was also noted in the letter “lets keep getting money, its easy!!!” There was also a copy of the envelope which was addressed to Resident A from Prisoner #2 at Prison #1. In addition, there was a copy of an envelope, documenting that it was legal mail, with Prisoner #3’s contact information at Prison #1.

On May 14, 2020, I spoke with ASM #1 and we discussed the complaint. The information we discussed was consistent with what ASM #1 documented in the incident report. ASM #1 informed me that she spoke with Employee #1 and told her that she violated HIPPA. According to ASM #1, Employee #1 was terminated.

On May 15, 2020, I spoke with Resident A’s guardian, Jackson County Guardian A. She informed me that Home Manager #1 contacted her regarding the first letter that Resident A received on or about April 21, 2020; a copy of the letter was faxed to her. Jackson County Guardian A inquired and asked Resident A if she knew anyone by the name of Prisoner #1, who was incarcerated at Prison #1, and Resident A informed her that she (Resident A) did not recognize the name. Yesterday (05/14/2020), another envelope was received at the facility, addressed to Resident A. After the envelope was opened and the concerning information was discovered an investigation was initiated. Employee #1 has been terminated.

During the course of this investigation, I reviewed the training records for Employee #1. It was documented that Employee #1 was trained as required. She also received training regarding The Privacy Rule of the HIPPA Act. Additionally, she received and acknowledged receipt of the CMH Recipient Rights’ Polices.

On July 8, 2020, I spoke with ASM #1. She stated that she and Administrative Staff Member #2 (ASM #2) spoke with Employee #1 and terminated her. ASM #1 did not

have any additional information regarding the criminal investigation. It is her understanding that Employee #1 was on the run from law enforcement. The Trooper told them that everyone involved would be in trouble and the prisoners would receive additional charges. I asked if any additional letters had been received and ASM #1 informed there were not. In addition, that she suspected that Employee #1 contacted the prisoners and told them to stop sending the letters. I inquired if she was aware of the specific contraband that they were concerned about and ASM #1 stated she was not; however, it had something to do with “watering down” or putting drugs on stamps.

APPLICABLE RULE	
R 400.14305	Resident protection.
	(3) A resident shall be treated with dignity and his or her personal needs, including protection and safety, shall be attended to at all times in accordance with the provisions of the act.
ANALYSIS:	<p>On May 14, 2020, an envelope from Prison #1 was sent to the facility and addressed to Resident A. Inside the envelope was a letter addressed to Employee #1, with concerning information, along with other legal documents. Michigan State Police was contacted and conducted an investigation. According to ASM #1, the MSP Trooper told them that everyone involved would be in trouble and the prisoners would receive additional charges.</p> <p>According to the AFC incident report, Resident A reported to the police that she did not know the individuals from prison.</p> <p>According to ASM #1, once this information was discovered, Employee #1 was terminated.</p> <p>Based on the information gathered during this investigation and provided above, it's concluded that there is a preponderance of the evidence to support the allegations that Resident A was not treated with dignity and her personal needs, including protection and safety, were not attended to at all times in accordance with the provisions of the act.</p>
CONCLUSION:	VIOLATION ESTABLISHED

IV. RECOMMENDATION

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

Mahtina Rubritius

7/09/2020

Mahtina Rubritius
Licensing Consultant

Date

Approved By:

A. Hunter

7/09/2020

Ardra Hunter
Area Manager

Date