



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

June 16, 2021

Jennifer Bhaskaran
Alternative Services Inc.
Suite 10
32625 W Seven Mile Rd
Livonia, MI 48152

RE: License #: AS630305248
Investigation #: 2021A0605028
Kingsley Trail

Dear Ms. Bhaskaran:

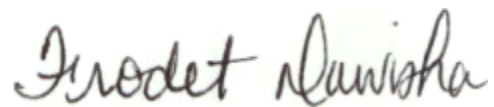
Attached is the Special Investigation Report for the above referenced facility. Due to the violations identified in the report, a written corrective action plan is required. The corrective action plan is due 15 days from the date of this letter and must include the following:

- 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 (248) 975-5053.

Sincerely,

A handwritten signature in black ink that reads "Frodet Dawisha". The signature is written in a cursive style with a light green highlight behind the name.

Frodet Dawisha, Licensing Consultant
Bureau of Community and Health Systems
4th Floor, Suite 4B
51111 Woodward Avenue
Pontiac, MI 48342
(248) 303-6348

enclosure

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

I. IDENTIFYING INFORMATION

| | |
|---------------------------------------|---|
| License #: | AS630305248 |
| Investigation #: | 2021A0605028 |
| Complaint Receipt Date: | 04/26/2021 |
| Investigation Initiation Date: | 04/27/2021 |
| Report Due Date: | 06/25/2021 |
| Licensee Name: | Alternative Services Inc. |
| Licensee Address: | Suite 10 32625 W Seven Mile Rd Livonia, MI 48152 |
| Licensee Telephone #: | (248) 471-4880 |
| Administrator: | Dwayne Price |
| Licensee Designee: | Jennifer Bhaskaran |
| Name of Facility: | Kingsley Trail |
| Facility Address: | 637 Kingsley Trail Bloomfield Hills, MI 48304 |
| Facility Telephone #: | (248) 593-9297 |
| Original Issuance Date: | 02/12/2010 |
| License Status: | REGULAR |
| Effective Date: | 08/14/2019 |
| Expiration Date: | 08/13/2021 |
| Capacity: | 6 |
| Program Type: | DEVELOPMENTALLY DISABLED MENTALLY ILL/TRAUMATICALLY BRAIN INJURED |

II. ALLEGATION(S)

| | Violation Established? |
|---|-----------------------------------|
| Resident A's personal allowance is not being tracked as requested. Receipts are not being kept. Facility indicates that Resident A handles his own money and therefore they refuse to log. However, Resident A cannot read or write. No deposits or withdrawals are being documented. | No |
| Additional Findings | Yes |

III. METHODOLOGY

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|------------|--|
| 04/26/2021 | Special Investigation Intake 2021A0605028 |
| 04/27/2021 | Special Investigation Initiated - Telephone I contacted Irene Schuck with St. Clair County Community Mental Health (CMH) regarding the allegations. |
| 04/28/2021 | Inspection Completed On-site I conducted an unannounced on-site investigation. I interviewed Residents A, B, C, D, E, and F, the home manager Carlette Smith and direct care staff (DCS) Trenton Slaughter. I also reviewed Resident A's resident care agreement, funds part II forms and individual plan of service (IPOS) completed by St. Clair County Community Mental Health (SCCCMH), |
| 05/10/2021 | Contact - Telephone call made I interviewed DCS Ciera Bevelle via telephone regarding the allegations. |
| 05/10/2021 | Contact - Telephone call made I left a voice mail message for SCCCMMH Mike Brown requesting a return call. |
| 05/26/2021 | Contact - Telephone call made I interviewed Resident B's guardian (1) and Resident D's guardian (2) via telephone. |
| 06/01/2021 | Contact - Telephone call made I left message with Lindsey Harrison for Resident A's legal guardian St. Clair County Public Guardian to call regarding the allegations. |

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| 06/01/2021 | Contact - Telephone call made I left another message for SCCCMH Mike Brown requesting a return call regarding Resident A's IPOS. |
| 06/02/2021 | Contact - Telephone call made I contacted SCCCMH Irene Schuck in the accounting department requesting Mike Brown's supervisors contact information. |
| 06/02/2021 | Contact - Telephone call received I received a voice mail from SCCCMH Irene Schuck with contact information for Mike Brown's supervisor, Tracy Duncan 810-966-7825. |
| 06/08/2021 | Contact - Telephone call made I left a voice mail message for Tracy Duncan. |
| 06/09/2021 | Contact - Telephone call received Telephone call received from Tracy Duncan supervisor of Mike Brown with SCCCMH. |
| 06/10/2021 | Contact - Telephone call received Telephone call received from SCCCMH support's coordinator, Mike Brown regarding allegations. |
| 06/15/2021 | Exit Conference I left a voice mail message for licensee designee Jennifer Bhaskaran advising her to return call to discuss the findings. |

ALLEGATION:

Resident A's personal allowance is not being tracked as requested. Receipts are not being kept. Facility indicates that Resident A handles his own money and therefore they refuse to log. However, Resident A cannot read or write. No deposits or withdrawals are being documented.

INVESTIGATION:

On 04/26/2021, intake #179082 was assigned for investigation regarding Kingsley Trail is not tracking Resident A's personal allowance on their funds part II forms nor are they providing receipts from 09/2020-02/2021. St. Clair County Community Mental Health (SCCCMH) received Resident A's fund's part II forms from 09/2020-02/2021 and all the forms were blank.

On 04/27/2021, I contacted via telephone Irene Schuck with SCCCMH regarding Resident A's fund's part II forms. Ms. Schuck stated in 2019, these allegations were

investigated by licensing and it was determined that Kingsley Trail will track Resident A's personal allowance whenever Resident A makes a purchase. Resident A's purchases were being tracked; however, that stopped in 09/2020. She is not sure or why the tracking stopped but it did. Ms. Schuck stated that Resident A does not read or write; therefore, he requires assistance from staff regarding his money. Resident A receives \$300 a month and can spend this money how he pleases. However, Kingsley Trail needs to track his purchases to verify how his money is being spent. Ms. Schuck stated in 2019, Resident A's supports coordinator, Mike Brown with SCCCMH was supposed to update the individual plan of service (IPOS) to state that Kingsley Trail must track his purchases, but as of today, the plan has not been updated. Ms. Schuck will email all documents regarding Resident A's resident care agreement (RCA), fund's part II forms, IPOS and any other documents regarding these allegations.

On 04/28/2021, I conducted an unannounced on-site investigation. I interviewed Residents A, B, C, D, E, and F, the home manager Carlette Smith and direct care staff (DCS) Trenton Slaughter regarding these allegations.

Resident A was sitting on his bed in his bedroom during this interview. He reported that he keeps his money with him in his wallet, but when asked where his wallet is, he stated, "I know where it is." Resident A was unable to provide any details as to his purchases or if Kingsley Trail is supposed to track his spending.

Resident B was interviewed in his bedroom. Resident B stated his brother is his legal guardian and sends him about \$100 per month. Resident B stated he is responsible for his own money and makes purchases himself when staff take him to the store. Resident B stated he does not require any assistance and has no concerns about staff or anything at Kingsley Trail.

Resident C was interviewed in his bedroom. Resident C is his own guardian. He receives about \$158 in personal funds that he keeps with him. Resident C stated he too does not require any assistance from staff regarding his money and makes his own purchases. He stated he sometimes assists Resident D with his money because Resident D is blind. Resident C stated he too has no issues with staff at Kingsley Trail.

Resident D was interviewed in his bedroom. Resident D is blind, and his sister is his guardian. Resident D stated his sister gives him personal funds left from his social security disability (SSD) which is about \$30-\$50 depending on the month. He stated he spends the money himself and sometimes receives help from staff or Resident C. Resident D stated he has no concerns about staff and that he has always received his change back after making purchases as he either has staff count his change or Resident C.

Resident E was interviewed in his bedroom. Resident E stated his brother is his legal guardian. Resident E stated his brother keeps all his money and makes all purchases for him as Resident E needs things. Resident E stated his brother purchases him

cartons of cigarettes, clothes and other items when needed. He does not have any concerns with staff at Kingsley Trail.

Resident F was interviewed in his bedroom. Resident F stated his legal guardian is John Munger. He stated he receives about \$64 a month and is responsible for his own money. He stated, "I keep my own money and I spend it the way I want to." Resident F stated he has no concerns to report.

The home manager (HM) Carlette Smith was interviewed regarding the allegations. Ms. Smith has been the HM since 2018. She works the day shift from 6AM-2PM. Ms. Smith reported that although Resident A is unable to read and write, Kingsley Trail is not responsible for tracking his personal allowance funds. Resident A was receiving \$75 per week, but it recently changed to \$50 per week totaling \$200 per month. Resident A's guardian, St. Clair County Public Guardians (SCCPG) sends the check in Resident A's name and once Resident A receives his check, staff take him directly to the bank. Resident A cashes the check and puts all his money into his wallet and keeps his wallet on him always. Ms. Smith stated the staff, nor she have contact with Resident A's money unless staff is helping Resident A during an outing in the community and Resident A makes a purchase. She stated the IPOS dated 04/03/2020 was never updated by SCCMH supports coordinator Mike Brown to reflect that Kingsley Trail was required to track Resident A's personal allowance. I reviewed Resident A's IPOS, and the HM was correct that Mr. Brown never updated the IPOS regarding tracking Resident A's personal funds. Ms. Smith stated she has made several attempts in reaching Mr. Brown for the current IPOS as the IPOS Kingsley Trail was in receipt of expired on 04/01/2021.

Ms. Smith stated in 2019, these same allegations were investigated by another licensing consultant and the case was closed and unsubstantiated due to the IPOS not indicating Kingsley Trail was required to track Resident A's personal funds. Ms. Smith stated during the investigation in 2019, this home began tracking Resident A's personal funds, but then stopped in 09/2020 due to the IPOS not stating they had to. In addition, Ms. Smith stated that although staff accompany Resident A to the store when making purchases, Resident A holds on to his receipts and does not give the receipts to staff. She stated that staff assist Resident A in paying for the purchases as well as give Resident A his change, but staff do not document the amounts. Also, Ms. Smith stated that Resident C helps Resident A with making purchases. There are times when Resident A will order pizza without staff's knowledge until the pizza is delivered at the home and Resident C helps Resident A pay for the pizza order. Ms. Smith stated the resident care agreement (RCA) box is not checked where it indicates that the licensee manages Resident A's funds. I reviewed the RCA dated 03/01/2021 and the HM is correct that the box is not checked by Resident A's guardian, SCCPG. I reviewed the fund's part II forms from 09/2020-02/2021 and the forms were blank. Ms. Smith stated there are no receipts being held for Resident A too. Ms. Smith stated Kingsley Trail is only responsible for holding emergency funds of \$20 for all the residents including Resident A each month.

I interviewed DCS Trenton Slaughter regarding the allegations. Mr. Slaughter has been with this corporation for 14 years and eight of those years at Kingsley Trail. He stated that staff have never had to track Resident A's personal funds for as long as Mr. Slaughter has worked here. When Mr. Slaughter takes Resident A to make a purchase, Resident A has his own wallet. At the register, the cashier will give Resident A the total, then Mr. Slaughter will tell Resident A the total and have Resident A open his wallet and then Ms. Slaughter assists Resident A in taking out the cash. Resident A will hand the cash to the cashier and then the change amount is told to Resident A who then receives his change and then Resident A will put his change back into his wallet along with his receipt. Mr. Slaughter stated Resident A holds on to all his receipts and does not give the receipts to staff. He stated that Resident A has never given Mr. Slaughter money directly to purchase Resident A items. Resident A is always with staff and responsible for his own purchases with staff's assistance. Mr. Slaughter stated that all staff follow the residents' IPOS'; therefore, if the IPOS does not indicate that Kingsley Trail is required to track personal funds, then they do not track them. He stated he reviewed Resident A's IPOS, and it does not indicate that staff are required to do so, therefore, they do not track any personal funds for Resident A. Mr. Slaughter stated he has never misused Resident A's funds.

The Program Director, Dwayne Price called the home while I was present. I interviewed Mr. Price via telephone regarding the allegations. Mr. Price stated Kingsley Trail has never been told to keep Resident A's receipts nor track Resident A's personal funds. He stated that all staff follow the residents' IPOS and if the IPOS does not state it, then the staff is not responsible to. Mr. Price stated that Kingsley Trail's staff cannot control what Resident A purchases and there are times when Resident A receives assistance from Resident C; therefore, staff are not aware of what the purchases are. Mr. Price suggested to Resident A's guardian, SCCPG to put all Resident A's personal funds on a debit card where purchases are tracked, but SCCPG has not done so.

On 05/10/2021, I interviewed DCS Ciera Bevelle regarding the allegations. Ms. Bevelle has been with this corporation since 01/2020. She works the afternoon shifts; 2PM-10PM. Ms. Bevelle stated that Kingsley Trails policy regarding residents' personal funds is that when staff accompany residents, staff is supposed to keep the receipts and then give the receipts to the HM. She stated she has always followed this procedure since working at this home. She was trained by the HM. Ms. Bevelle stated that Resident A has his own wallet and hands the wallet to Ms. Bevelle who then tells Resident A the amount of the purchase. She takes the cash out of the wallet and tells Resident A the amount she is taking out and then gives the cash to the cashier. She then receives the change, tells Resident A the amount he is getting back and then she puts the change into his wallet and hands Resident A his wallet back. She stated, "I keep the receipt." Ms. Bevelle stated that Resident A has never kept the receipt when she accompanies him to make a purchase. Resident A has never been her money directly to make purchases on her own him. Ms. Bevelle stated she has never misused Resident A's funds.

On 05/26/2021, I interviewed Resident B's guardian (2) via telephone. Guardian 2 stated he is Resident B's representative payee. Resident B receives \$100 per month and Resident B is responsible for his own personal funds. He stated that Kingsley Trail is not responsible for tracking Resident B's funds as that was not agreed upon at admission. Guardian 2 stated staff accompany Resident B to the bank to cash his check and then accompany Resident B to make purchases but are not responsible for tracking Resident B's spending. He stated, "Resident B is high functioning," therefore, Guardian 2 has no concerns about Resident B's funds or the staff at this home.

On 05/26/2021, I interviewed Resident D's guardian (3) via telephone regarding the allegations. Guardian 3 stated she gives Resident D about \$30-\$50 per month for personal spending when she visits him at Kingsley Trail. She stated that Kingsley Trail is not responsible for tracking Resident D's spending even though Resident D is blind. She stated, "this home is very good, and the HM is excellent as she took good care of Resident D." Guardian 3 reported no concerns with Resident D's personal funds or the staff.

On 06/01/2021, I interviewed Resident A's guardian, SCCPG regarding the allegations. The paralegal stated that Kingsley Trail was never responsible for tracking Resident A's personal funds as that is not what was agreed at admission. She stated she reviewed the RCA, and the box is unchecked where it states that the licensee is responsible for personal funds. The paralegal stated she will speak with Resident A's guardian and have the guardian call this licensing consultant.

On 06/02/2021, I contacted Irene Schuck regarding Resident A's personal funds and IPOS. Ms. Schuck stated she has not heard from Mike Brown regarding updating Resident A's IPOS to reflect that Kingsley Trail is required to track personal funds. Ms. Schuck was advised that several messages have been left for Mr. Brown, but no return calls were received. Ms. Schuck stated she will contact Mr. Brown's supervisor and have the supervisor contact this licensing consultant.

On 06/02/2021, I received a voice mail message from Irene Schuck with Mike Brown supervisor's contact information.

On 06/09/2021, I contacted Mike Brown's supervisor, Tracy Duncan with SCCCMH. Ms. Duncan apologized for Mr. Brown not returning calls and will have Mr. Brown call immediately regarding Resident A's IPOS. Ms. Duncan was advised that the HM had also tried calling Mr. Brown to update Resident A's IPOS but had been unsuccessful in reaching Mr. Brown or having Mr. Brown update the IPOS. Ms. Duncan acknowledged and will have Mr. Brown contact Kingsley Trail and work with staff to update the IPOS to reflect tracking of Resident A's personal funds.

On 06/10/2021, I received a telephone call from Mike Brown support's coordinator with SCCCMH. Mr. Brown stated his voice mail had not been working; therefore, he was not aware he had voice mails. He apologized for not returning the calls. Mr. Brown stated

he had spoken with the HM last year (date unknown) and advised the HM that staff must record Resident A's personal funds, but that he never updated Resident A's IPOS to reflect that information. I advised Mr. Brown that Kingsley Trail follow residents' IPOS; therefore, if Resident A's IPOS did not state that staff are required to record Resident A's personal funds, then Kingsley Trail is not held responsible for tracking personal funds unless Resident A's IPOS is updated. Mr. Brown stated he will be meeting with the HM at Kingsley Trail next week to amend the IPOS to state that Kingsley Trail is required to record Resident A's personal funds.

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| APPLICABLE RULE | |
| R 400.14315 | Handling of resident funds and valuables. |
| | (3) A licensee shall have a resident's funds and valuables transaction form completed and on file for each resident. A department form shall be used unless prior authorization for a substitute form has been granted, in writing, by the department. |
| ANALYSIS: | Based on my investigation and information gathered, Kingsley Trail was not responsible for completing Resident A's fund's part II forms from 09/2020-02/2021. Although Resident A cannot read or write, Kingsley Trail follows Resident A's IPOS. Resident A's IPOS was never updated to reflect that Resident A's personal funds should be recorded. In 2019, during a special investigation it was determined that Resident A's IPOS would be updated to reflect that Resident A's personal funds must be recorded by Kingsley Trail; however, the support's coordinator Mike Brown never updated the IPOS. In addition, Resident A's RCA's box indicating that the licensee designee would be responsible for Resident A's personal funds was also unchecked. Therefore, Kingsley Trail cannot be held responsible for recording Resident A's personal funds if the IPOS was never amended, and Resident A's guardian never agreed for Kingsley Trail to record Resident A's personal funds. |
| CONCLUSION: | VIOLATION NOT ESTABLISHED |

ADDITIONAL FINDINGS:

INVESTIGATION:

On 04/27/2021, I reviewed Resident A's RCA dated 03/01/2021 and the RCA was not signed by the licensee designee Jennifer Bhaskaran or Mike Brown, SCCCMH support's coordinator. I reviewed Resident A's IPOS dated 04/03/2020 and the IPOS was not signed by Resident A's guardian, SCCPG or licensee designee Jennifer Bhaskaran. In addition, Resident A's IPOS expired on 04/01/2021.

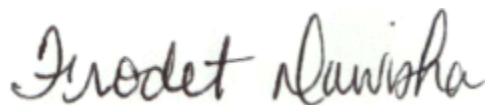
On 06/15/2021, for the exit conference, I left a voice mail message for licensee designee Jennifer Bhaskaran requesting a return call to discuss my findings.

| APPLICABLE RULE | |
|------------------------|---|
| R 400.14301 | Resident admission criteria; resident assessment plan; emergency admission; resident care agreement; physician's instructions; health care appraisal. |
| | (4) At the time of admission, and at least annually, a written assessment plan shall be completed with the resident or the resident's designated representative, the responsible agency, if applicable, and the licensee. A licensee shall maintain a copy of the resident's written assessment plan on file in the home. |
| ANALYSIS: | Based on my review of Resident A's IPOS dated 04/03/2020, the IPOS was not signed by Resident A's guardian, St. Clair County Public Guardian, or the licensee designee Jennifer Bhaskaran. Also, the IPOS expired on 04/01/2021. |
| CONCLUSION: | VIOLATION ESTABLISHED |

| APPLICABLE RULE | |
|------------------------|--|
| R 400.14301 | Resident admission criteria; resident assessment plan; emergency admission; resident care agreement; physician's instructions; health care appraisal. |
| | (8) A copy of the signed resident care agreement shall be provided to the resident or the resident's designated representative. A copy of the resident care agreement shall be maintained in the resident's record. |
| ANALYSIS: | Based on my review of Resident A's resident care agreement dated 03/01/2021, the licensee designee Jennifer Bhaskaran and the support's coordinator Mike Brown with St. Clair County Community Mental Health did not sign the resident care agreement. |
| CONCLUSION: | VIOLATION ESTABLISHED |

IV. RECOMMENDATION

Contingent upon receiving an acceptable corrective action plan, I recommend that this special investigation be closed and no change to the status of the license.

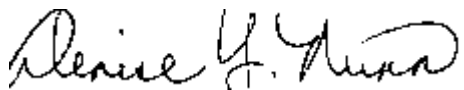


06/15/2021

Frodet Dawisha
Licensing Consultant

Date

Approved By:



06/16/2021

Denise Y. Nunn
Area Manager

Date