



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

ORLENE HAWKS  
DIRECTOR

May 18, 2022

Simbarashe Chiduma  
Open Arms Link  
Suite 130  
8161 Executive Court  
Lansing, MI 48917

RE: License #: AS330395823  
Investigation #: 2022A0790007  
Open Arms Greenhouse

Dear Mr. Chiduma:

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 (517) 284-9730.

Sincerely,

A handwritten signature in cursive script that reads "Rodney Gill".

Rodney Gill, Licensing Consultant  
Bureau of Community and Health Systems  
611 W. Ottawa Street  
P.O. Box 30664  
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>                     | AS330395823  |
| <b>Investigation #:</b>               | 2022A0790007   |
| <b>Complaint Receipt Date:</b>        | 03/28/2022   |
| <b>Investigation Initiation Date:</b> | 03/30/2022   |
| <b>Report Due Date:</b>               | 05/27/2022   |
| <b>Licensee Name:</b>                 | Open Arms Link   |
| <b>Licensee Address:</b>              | Suite 130<br>8161 Executive Court<br>Lansing, MI 48917 |
| <b>Licensee Telephone #:</b>          | (517) 483-2489   |
| <b>Administrator:</b>                 | Mascline Chiduma                                       |
| <b>Licensee Designee:</b>             | Simbarashe Chiduma                                     |
| <b>Name of Facility:</b>              | Open Arms Greenhouse                                   |
| <b>Facility Address:</b>              | 922 Green Street<br>Lansing, MI 48906                  |
| <b>Facility Telephone #:</b>          | (517) 455-8300   |
| <b>Original Issuance Date:</b>        | 10/30/2018   |
| <b>License Status:</b>                | REGULAR  |
| <b>Effective Date:</b>                | 04/30/2021   |
| <b>Expiration Date:</b>               | 04/29/2023   |
| <b>Capacity:</b>                      | 6  |

|                      |  |
|----------------------|--|
| <b>Program Type:</b> | DEVELOPMENTALLY DISABLED<br>MENTALLY ILL<br>AGED |
|----------------------|--|

## II. ALLEGATION(S)

|  | <b>Violation<br/>Established?</b> |
|--|-----------------------------------|
| The licensee designee Simbarashe Chiduma and administrator Mascline Chiduma are hiring illegal staff to work as live in direct care staff members and are producing and providing false documents to LARA. This includes current live in direct care staff member Caleb Nyoni and former direct care staff members Bonface Machewere and Barbara Mutandwa. | Yes                               |
| Live in direct care staff member Caleb Nyoni did not have proof that he was fingerprinted nor had a Michigan Workforce Background Check completed in his employee file.  | Yes                               |
| Administrator Mascline Chiduma forced two previous direct care staff members to falsify fire drill logs and medication administration records in March of 2021 before AFC Licensing completed the renewal inspection for Open Arms Greenhouse.   | No                                |

## III. METHODOLOGY

|            |  |
|------------|--|
| 03/28/2022 | Special Investigation Intake<br>2022A0790007   |
| 03/30/2022 | Special Investigation Initiated - Telephone<br>Spoke to complainant via phone to gather additional information regarding the allegations made. |
| 03/31/2022 | Contact - Document Received  |
| 04/07/2022 | Inspection Completed On-site   |
| 04/07/2022 | Contact - Face to Face- Interviewed live in direct care staff member Caleb Nyoni at Open Arms Greenhouse Adult Foster Care home.               |
| 04/08/2022 | Contact - Telephone call made to interview previous direct care staff member Lusubilo Mbohe.   |

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| 04/12/2022 | Contact - Telephone call made to interview direct care staff member Divine Uwamahoro.  |
| 04/12/2022 | Contact - Telephone call made to interview direct care staff member Michelle Wells.  |
| 04/26/2022 | Inspection Completed-BCAL Sub. Compliance  |
| 04/29/2022 | Contact – Face to Face with Human Resources Assistant Manager Kimberly Solgat to review additional employee records.                                 |
| 05/16/2022 | Exit Conference with licensee designee Simbarashe Chiduma and administrator Mascline Chiduma.  |
| 05/18/2022 | Corrective Action Plan Requested and Due on 06/02/2022   |
| 05/18/2022 | Special Investigation Report Sent to licensee designee Simbarashe Chiduma and administrator Macline Chiduma.   |
| 05/18/2022 | Contact – Documents Sent to complainant providing her with information concerning the written complaint she filed with our department on 03/28/2022. |
| 05/18/2022 | Corrective Action Plan Received  |
| 05/18/2022 | Corrective Action Plan Approved  |
| 05/18/2022 | Contact – Document Sent – CAP Approval Letter was sent to licensee designee Simbarashe Chiduma.  |
| 05/18/2022 | Special Investigation Closed   |

**ALLEGATION:**

**The licensee designee Simbarashe Chiduma and administrator Mascline Chiduma are hiring illegal staff to work as live in direct care staff members and are producing and providing false documents to LARA. This includes current live in direct care staff member named Caleb Nyoni and former direct care staff members Bonface Machewere and Barbara Motandwa.**

**INVESTIGATION:**

I spoke to Complainant on 03-30-2022 to gather additional information regarding this investigation involving the Open Arms Link Corporation. No additional allegations were made pertaining to the Open Arms Greenhouse Adult Foster Care home, but additional information was gathered to better understand Complainant's concerns.

Staff directories were received via email by Open Arms Link Corporation human resources assistant manager Kimberly Solgat and reviewed on 03-31-2022.

An unannounced on-site investigation was conducted at Open Arms Greenhouse Adult Foster Care home on 04-07-2022 by this consultant. Three residents were present and

watching television during the investigation. There were no concerns observed regarding the residents' personal care nor their safety. Direct care staff member Caleb Nyoni was interviewed. Mr. Nyoni stated that he is legal to work in the United States. He was asked to provide some form of identification, but he indicated that his driver's license was currently in the car used by Open Arms Link Corporation to transport residents to appointments and community activities. Mr. Nyoni provided me with his birthdate and correct spelling of his name. Mr. Nyoni said that another direct care staff member was currently using the vehicle to take a resident from another Open Arms Adult Foster Care home to a doctor's appointment. He said that the direct care staff member's name is Michelle Wells, and she also works at Open Arms Greenhouse.

Mr. Nyoni stated that he has been the live-in direct care staff member at Open Arms Greenhouse since November of 2021. He said that he was fingerprinted, had a TB test, and had completed all the required training including CPR/First Aid/Recipient Rights Orientation Training to be able to work independently as a direct care staff member.

Mr. Nyoni stated that the only two direct care staff members that work at Open Arms Greenhouse are Michelle Wells and himself. He said that Divine Uwamahoro is a hired housekeeper whose only responsibility is cleaning. He said that she does not provide any direct care to the residents. Mr. Nyoni stated that he works Monday through Saturday each week and that Ms. Wells and Ms. Uwamahoro work Monday through Friday.

Direct care staff member Divine Uwamahoro was interviewed on 04-12-2022. She said that she works at Open Arms Greenhouse. Ms. Uwamahoro stated that she has been working six months at this home. She said that she was hired in November of 2021. Ms. Uwamahoro said that she is legal to work in the United States. Ms. Uwamahoro stated she has completed CPR, First Aid, and Medication training. She was fingerprinted and had a background check. Ms. Uwamahoro also said that she had a physical examination and TB test.

Ms. Uwamahoro stated that she knows nothing about direct care staff members working for Open Arms Link Corporation that are not legal to work in the United States. She said that she has not heard anything about that. Ms. Uwamahoro stated that she has no issues with working for Open Arms Link Corporation.

Direct care staff member Michelle Wells was interviewed on 04-12-2022. She said that she works at multiple licensed AFC properties owned by the licensee including Open Arms Greenhouse. Ms. Wells explained that she is currently the activities coordinator for four homes, plans all the activities, and takes the residents on outings and to appointments. Ms. Wells indicated that she is a citizen of the United States. She stated that she was fingerprinted, had a background check, was physically examined by a licensed physician, and had a TB test when she began working for Open Arms Link Corporation to ensure that she could complete all the responsibilities and duties associated with direct care staff work. Ms. Wells stated that she was not aware of any direct care staff members working at any of the Open Arm's homes that were not legally

able to work in the United States. She said that she keeps to herself though and does not personally know many of the direct care staff members working in the homes.

A second onsite investigation took place at the Open Arms Link corporate office on 04-21-2022 to review daily schedules and employee files for Open Arms Greenhouse. Office manager Jason Zilka was working at the time of the unannounced investigation.

Mr. Zilka indicated that Caleb Nyoni is no longer working for the Open Arms Link Corporation. Upon review of the monthly direct care staff member schedule for the month of April 2022, Caleb Nyoni was scheduled to work as recently as 04-22-2022.

- Upon my review of direct care staff member Caleb Nyoni's employee record, Mr. Nyoni's hire date was listed as 10-31-2021. I found an *Employment Agreement* form with Caleb Nyoni listed as the direct care staff member agreeing to employment with Open Arms Link Corporation. However, I also found the following documentation in Caleb Nyoni's employee records with the name Joshua Chidewa listed as the direct care staff member: a W-4 tax form, Open Arms Direct Deposit Form, OAL & RCL Onboarding Info Needed form. On the OAL & RCL Onboarding Info Needed form, Joshua Chidewa's name is listed but Caleb Nyoni's email address is listed on this same form. The date of birth listed for Mr. Chidewa was different than the date of birth that Mr. Nyoni provided as his date of birth during a face-to-face interview on 04-07-2022. There were no other documents nor forms of identification found in the employee record for Caleb Nyoni. There was no driver's license, social security card, job application, list of references, work history, education, duties of direct care staff members, job description, onboarding documentation, Michigan Workforce Background letter indicating that Caleb Nyoni was eligible to work in an Adult Foster Care home, medical examination, TB test, nor a health appraisal form found in Mr. Nyoni's employee record. There were also no training records in Mr. Nyoni's employee record.
- Direct care staff member Michelle Wells' employee record was reviewed. It was found that Ms. Wells had all the required documentation to work independently as a direct care staff member in her employee record. She had a driver's license, social security card, employment agreement, job application with at least two references that had been contacted and had responded in writing, work history, education, duties of direct care staff members, job description, onboarding documentation, Michigan Workforce Background letter indicating that Ms. Wells is eligible to work in an Adult Foster Care home, a medical examination, an up to date negative TB test, employer health appraisal form, and all necessary training including CPR/First Aid/Medication/Recipient Rights were all found in Ms. Wells' employee record.
- Direct care staff member Divine Uwamahora's employee record was reviewed. It was found that Ms. Uwamahora had all the required documentation to work independently as a direct care staff member in her employee record. She had a

driver's license, social security card, employment agreement, job application with at least two references that had been contacted and had responded in writing, work history, education, duties of direct care staff members, job description, onboarding documentation, Michigan Workforce Background letter indicating that Ms. Uwamahora is eligible to work in an Adult Foster Care home, a medical examination, an up to date negative TB test, employer health appraisal form, and all necessary training including CPR/First Aid/Medication/Recipient Rights were all found in Ms. Uwamahora's employee record.

I also requested former direct care staff members Bonface Machewere and Barbara Mutandwa employee records but was not provided with any employee records at the time I was initially at the corporate office. I was provided with the employees' information during a second onsite investigation that took place on 04-29-2022.

- There was also little employee information for former direct care staff member Barbara Mutandwa. The only documents located in Ms. Mutandwa's employee record were a Michigan Identification Card, a social security card, and a United States of America Employment Authorization card.
- Previous direct care staff member Bonface Amon Machewere's employee record was reviewed. It was found that Mr. Machewere had all the required documentation to work independently as a direct care staff member in his employee record. He had a driver's license, social security card, employment agreement, job application with at least two references that had been contacted and had responded in writing, work history, education, duties of direct care staff members, job description, onboarding documentation, Michigan Workforce Background letter indicating that Mr. Machewere was eligible to work in an Adult Foster Care home, a medical examination, an up to date negative TB test, employer health appraisal form, and all necessary training including CPR/First Aid/Medication/Recipient Rights were all found in Mr. Machewere's employee record.

Licensee designee Simbarashe Chiduma and administrator Mascline Chiduma were interviewed, and an exit conference was conducted on 05-16-2022. Mr. Chiduma stated that he has no idea why a W-4 tax form was found in Caleb Nyoni's employee record in the name of Joshua Chidewa. He confirmed that Caleb Nyoni does not go by any other name other than Caleb Nyoni. Mr. Chiduma admitted that it is true that Mr. Nyoni did not have the proper documentation and training completed and in his employee record necessary to work independently as a direct care staff member. He said that was the reason he was no longer employed by Open Arms Link corporation.

Simbarashe and Mascline Chiduma stated that Barbara Mutandwa's employee record went missing and that is why there were so few documents in her employee record. Ms. Chiduma stated that they had additional documentation and training for Ms. Mutandwa before her employee record went missing. Mr. and Mrs. Chiduma



indicated that they do not know where Ms. Mutandwa's additional documentation and training went.

Simbarashe and Masline Chiduma agreed that they did not maintain a complete employee record for Caleb Nyoni and that he should not have been working independently as a direct care staff member at Open Arms Greenhouse.

| <b>APPLICABLE RULE</b> |  |
|------------------------|--|
| <b>R 400.14208</b>     | <b>Direct care staff and employee records.</b>   |
|                        | <p><b>(1) A licensee shall maintain a record for each employee. The record shall contain all of the following employee information:</b></p> <ul style="list-style-type: none"><li><b>(a) Name, address, telephone number, and social security number.</b></li><li><b>(b) The professional or vocational license, certification, or registration number, if applicable.</b></li><li><b>(c) A copy of the employee's driver license if a direct care staff member or employee provides transportation to residents.</b></li><li><b>(d) Verification of the age requirement.</b></li><li><b>(e) Verification of experience, education, and training.</b></li><li><b>(f) Verification of reference checks.</b></li><li><b>(g) Beginning and ending dates of employment.</b></li><li><b>(h) Medical information, as required.</b></li><li><b>(i) Required verification of the receipt of personnel policies and job descriptions.</b></li></ul> |

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| <b>ANALYSIS:</b>   | <p>Based on the evidence gathered during this investigation through interviews with current direct care staff members, other employees working for Open Arms Link Corporation, and review of direct care staff member's <i>monthly schedule logs</i> and employee records it was found that licensee designee Simbarashe Chiduma and administrator Mascline Chiduma did not maintain a complete employee record for Caleb Nyoni as multiple required records were missing. There is also concern about the legitimacy of some documents within the files as names and vital statistics did not match. The direct care staff member named Caleb Nyoni had a W-4 tax form, Open Arms Direct Deposit Form, and OAL &amp; RCL Onboarding Info Needed form in his employee record with the name Joshua Chidewa listed as the direct care staff member and with a different date of birth than provided by Mr. Nyoni when interviewed face to face. The OAL &amp; RCL Onboarding Info Needed form, lists Joshua Chidewa's as the direct care staff member but Caleb Nyoni's email address is listed on this same form.</p> <p>There was also no employee record for former direct care staff member Barbara Mutandwa. There were no copies of a job application, list of references, Michigan Workforce Background letter indicating that Barbara Mutandwa was eligible to work in an Adult Foster Care home, medical examination, TB test, or a health appraisal form found in her employee record.</p> |
| <b>CONCLUSION:</b> | <b>VIOLATION ESTABLISHED</b>   |

**ALLEGATION:**

**Live-in direct care staff member Caleb Nyoni did not have proof that he was fingerprinted nor had a Michigan Workforce Background Check completed in his employee file.**

**INVESTIGATION:**

An unannounced on-site investigation was conducted at Open Arms Greenhouse Adult Foster Care home on 04-07-2022. Three residents were present and watching television during the investigation. There were no concerns observed regarding the residents' personal care nor their safety. Direct care staff member Caleb Nyoni was interviewed. Mr. Nyoni stated that he is legal to work in the United States however at the time of this unannounced onsite investigation Mr. Nyoni was unable to produce any type of identification.

A second onsite investigation took place at the Open Arms Link corporate office on 04-21-2022 to review daily schedules and employee files for Open Arms Greenhouse.

Office manager Jason Zilka was working at the time of the unannounced investigation. Mr. Zilka indicated that Caleb Nyoni is no longer working for the Open Arms Link Corporation. Upon review of the monthly direct care staff member schedule for the month of April 2022, Caleb Nyoni was scheduled to work as recently as 04-22-2022.

- Upon my review of direct care staff member Caleb Nyoni’s employee record, I found an *Employment Agreement* form with Caleb Nyoni listed as the direct care staff member agreeing to employment with Open Arms Link Corporation. There was no Michigan Workforce Background letter indicating that Caleb Nyoni was eligible to work in an Adult Foster Care home.
- Upon my review of former direct care staff member Barbara Mutandwa’s employee record, there was no evidence of a completed Michigan Workforce Background letter indicating Barbara Mutandwa was eligible to work in an Adult Foster Care home.

Licensee designee Simbarashe Chiduma and administrator Mascline Chiduma were interviewed, and an exit conference was conducted on 05-16-2022. Mr. Chiduma admitted that it is true that Mr. Nyoni did not have the proper documentation and training completed and in his employee record necessary to work independently as a direct care staff member. There was no documentation in Mr. Nyoni’s employee record that he had completed the fingerprinting process prior to having access to residents or providing care to residents.

Simbarashe and Mascline Chiduma stated that Barbara Mutandwa’s file went missing and that is why there were so few documents in her employee record. Ms. Chiduma stated that they had additional documentation and training for Ms. Mutandwa before her employee record went missing. Mr. and Mrs. Chiduma indicated that they do not know where Ms. Mutandwa’s additional documentation and training went, but admitted that the additional documentation, training, and fingerprint results should have been in Ms. Mutandwa’s employee record for her to work independently as a direct care staff member.

| <b>APPLICABLE RULE</b> |  |
|------------------------|--|
| <b>MCL 400.734b</b>    | <b>Employing or contracting with certain employees providing direct services to residents; prohibitions; criminal history check; exemptions; written consent and identification; conditional employment; use of criminal history record information; disclosure; failure to conduct criminal history check; automated fingerprint identification system database; report to legislature; costs; definitions.</b> |
|                        | <b>(2) Except as otherwise provided in this subsection or subsection (6), an adult foster care facility shall not employ or independently contract with an individual who has direct</b>   |

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|                         | <p>access to residents until the adult foster care facility or staffing agency has conducted a criminal history check in compliance with this section or has received criminal history record information in compliance with subsections (3) and (11). This subsection and subsection (1) do not apply to an individual who is employed by or under contract to an adult foster care facility before April 1, 2006. On or before April 1, 2011, an individual who is exempt under this subsection and who has not been the subject of a criminal history check conducted in compliance with this section shall provide the department of state police a set of fingerprints and the department of state police shall input those fingerprints into the automated fingerprint identification system database established under subsection (14). An individual who is exempt under this subsection is not limited to working within the adult foster care facility with which he or she is employed by or under independent contract with on April 1, 2006 but may transfer to another adult foster care facility, mental health facility, or covered health facility. If an individual who is exempt under this subsection is subsequently convicted of a crime or offense described under subsection (1)(a) to (g) or found to be the subject of a substantiated finding described under subsection (1)(i) or an order or disposition described under subsection (1)(h), or is found to have been convicted of a relevant crime described under 42 USC 1320a-7(a), he or she is no longer exempt and shall be terminated from employment or denied employment.</p> |
| <p><b>ANALYSIS:</b></p> | <p>Based on the evidence gathered during this investigation through interviews with current direct care staff members, other employees working for Open Arms Link Corporation, and review of direct care staff member's <i>monthly schedule logs</i> and employee records it was found the licensee did not have proof that either direct care staff member Caleb Nyoni or Barbara Mutandwa were fingerprinted or had a Michigan Workforce Background Check completed in their employee record prior to having direct access to residents or to work independently with residents. Licensee designee Simbarashe Chiduma and administrator Mascline Chiduma allowed Mr. Nyoni to work independently as a live in direct care staff member without first fingerprinting or conducting a criminal history check on Mr. Nyoni. Licensee designee Simbarashe Chiduma and administrator Mascline Chiduma allowed Ms. Mutandwa to work independently as a live in direct care staff member without first fingerprinting or conducting a criminal history check on Ms. Mutandwa.</p>   |

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| <b>CONCLUSION:</b> | <b>VIOLATION ESTABLISHED</b> |

**ALLEGATION:**

**Administrator Mascline Chiduma forced two previous direct care staff members to falsify fire drill logs and medication administration records in March of 2021 before AFC Licensing completed the renewal inspection for Open Arms Greenhouse.**

**INVESTIGATION:**

An unannounced on-site investigation was conducted at Open Arms Greenhouse Adult Foster Care home on 04-07-2022. Three residents were present and watching television during the investigation. There were no concerns observed regarding the residents' personal care nor their safety. Direct care staff member Caleb Nyoni was interviewed.

Mr. Nyoni was asked to show me the fire drill logs for March of 2021. There was no evidence found indicating that the fire drill logs had been falsified. The dates on the fire drill logs matched the dates on the fire drill record and the logs were extremely detailed in their description of what happened during the drills. They described how individual residents performed and how quickly they were able to get out of the home. All the drills were signed by direct care staff member Bonface Machewere.

I called previous direct care staff member Lusubilo Mbobe to discuss the allegation that she was asked to falsify information back in March of 2021 while working at Open Arms Greenhouse. Ms. Mbobe indicated that she did previously work as a direct care staff member at Open Arms Greenhouse and had the title of activities coordinator while employed there. She said that no one had completed the fire drills for March of 2021, and she was asked to do so before the renewal inspection was to be completed.

I informed Ms. Mbobe that I had reviewed the fire drill logs for March 2021 during an on-site investigation at Open Arms Greenhouse on 04-07-2022, and that the fire drill logs for March 2021 had been allegedly filled out and signed by Bonface Machewere. She was also told that the fire drill logs were extremely detailed and well written. Ms. Mbobe denied that she had filled out the fire logs for March 2021 and filled in Mr. Machewere's name. She said that she must have been mistaken and that she did not fill out the fire drill logs given that they were signed by Mr. Machewere. Ms. Mbobe stated that she might have been mistaken and cannot remember if she was working at Open Arms Greenhouse in March of 2021. Ms. Mbobe indicated that if the fire drill logs have Mr. Machewere's name on them, then he filled them out. Ms. Mbobe could not provide any details regarding her participation in the falsification of medication administration records.

Licensee designee Simbarashe Chiduma and administrator Masline Chiduma were interviewed, and an exit conference was conducted on 05-16-2022. They were informed that a violation was not established for the allegation indicating that Administrator Masline Chiduma forced two previous direct care staff members to falsify fire drill logs and medication administration records in March of 2021 before AFC Licensing completed the renewal inspection for Open Arms Greenhouse.

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| <b>APPLICABLE RULE</b> |  |
| <b>R 400.14318</b>     | <b>Emergency preparedness; evacuation plan; emergency transportation.</b>  |
|                        | <b>(5) A licensee shall practice emergency and evacuation procedures during daytime, evening, and sleeping hours at least once per quarter. A record of the practices shall be maintained and be available for department review.</b>  |
| <b>ANALYSIS:</b>       | Based on the evidence found during this investigation through interviews with current and previous direct care staff members and review of documentation kept at Open Arms Greenhouse there is no violation that any fire drill records were falsified to assist the facility to be in compliance. |
| <b>CONCLUSION:</b>     | <b>VIOLATION NOT ESTABLISHED</b>   |

#### IV. RECOMMENDATION

Upon the receipt of an acceptable corrective action plan, it is recommended that the status of the license remains unchanged.



04-28-2022

Rodney Gill  
Licensing Consultant

Date

Approved By:



05/18/2022

Dawn N. Timm

Date

Area Manager