



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

ORLENE HAWKS  
DIRECTOR

March 16, 2023

Janet Difazio  
Spectrum Community Services  
185 E. Main St  
Suite 700  
Benton Harbor, MI 49022

RE: License #: AS630397223  
Investigation #: 2023A0991013  
Groveland Home

Dear Ms. Difazio:

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 cursive script that reads "Kristen Donnay". The signature is written in black ink and is positioned below the word "Sincerely,".

Kristen Donnay, Licensing Consultant  
Bureau of Community and Health Systems  
Cadillac Place  
3026 W. Grand Blvd., Ste. 9-100  
Detroit, MI 48202  
(248) 296-2783

enclosure

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

**I. IDENTIFYING INFORMATION**

<b>License #:</b>	AS630397223
<b>Investigation #:</b>	2023A0991013
<b>Complaint Receipt Date:</b>	01/23/2023
<b>Investigation Initiation Date:</b>	01/23/2023
<b>Report Due Date:</b>	03/24/2023
<b>Licensee Name:</b>	Spectrum Community Services
<b>Licensee Address:</b>	185 E. Main St Suite 700 Benton Harbor, MI 49022
<b>Licensee Telephone #:</b>	(734) 458-8729
<b>Licensee Designee:</b>	Janet Difazio
<b>Name of Facility:</b>	Groveland Home
<b>Facility Address:</b>	9921 Walnut Hill Drive Davisburg, MI 48350
<b>Facility Telephone #:</b>	(248) 634-1297
<b>Original Issuance Date:</b>	06/06/2019
<b>License Status:</b>	REGULAR
<b>Effective Date:</b>	12/06/2021
<b>Expiration Date:</b>	12/05/2023
<b>Capacity:</b>	6
<b>Program Type:</b>	PHYSICALLY HANDICAPPED DEVELOPMENTALLY DISABLED MENTALLY ILL AGED

## II. ALLEGATION(S)

	<b>Violation Established?</b>
Unauthorized purchases were made by Spectrum's quality coordinator, Tyeshia Hollins, using Resident M and Resident N's food assistance benefits.	Yes

## III. METHODOLOGY

01/23/2023	Special Investigation Intake 2023A0991013
01/23/2023	Special Investigation Initiated - Telephone Call to licensee designee, Janet DiFazio
01/23/2023	Referral - Recipient Rights Call to Office of Recipient Rights (ORR) worker, Katie Garcia
01/24/2023	APS Referral Referred to Adult Protective Services (APS) Centralized Intake
01/24/2023	Contact - Document Received Incident reports and printouts of food assistance transactions
01/25/2023	Contact - Document Received Email from APS- denied complaints for investigation referred back to licensing and law enforcement
02/09/2023	Contact - Face to Face Interviewed licensee designee, Janet DiFazio at Lake Braemar Home
02/09/2023	Contact - Document Received Supporting documentation re: food assistance transactions, disciplinary action, written statements
03/01/2023	Inspection Completed On-site Unannounced onsite inspection at Groveland Home, interviewed home manager and observed residents
03/02/2023	Contact - Telephone call made To ORR worker, Katie Garcia
03/02/2023	Contact - Telephone call made Interviewed Tyeshia Hollins via telephone

03/07/2023	Contact - Telephone call received From assigned detective, Jeffrey Rodgers
03/07/2023	Contact - Telephone call made To licensee designee, Janet DiFazio
03/07/2023	Contact - Document Received Food stamp monthly tracking forms
03/08/2023	Contact - Telephone call received From ORR worker, Katie Garcia
03/09/2023	Contact - Telephone call made To former staff, Belinda Lillard
03/14/2023	Exit Conference Via telephone with licensee designee, Janet DiFazio

**ALLEGATION:**

**Unauthorized purchases were made by Spectrum’s quality coordinator, Tyeshia Hollins, using Resident M and Resident N’s food assistance benefits.**

**INVESTIGATION:**

On 01/23/23, I received a phone call from the licensee designee, Janet DiFazio. Ms. DiFazio stated that the quality coordinator, Tyeshia Hollins, no longer works for Spectrum Community Services. Upon looking through her work issued cell phone, they found Ms. Hollins had pictures of electronic benefit transfer cards (EBT/bridge cards), which belonged to several Spectrum residents, on her phone. Spectrum administrators reviewed purchases made with the cards using the residents’ food assistance benefits. There was concern that Ms. Hollins had been using bridge cards from residents at Groveland Home, Seven Lakes Home, and Lake Braemar Home to make personal purchases. I created a special investigation intake, which was assigned to me for investigation. On 01/23/23, I contacted the assigned Office of Recipient Rights (ORR) worker, Katie Garcia. On 01/24/23, I made a referral to Adult Protective Services (APS) Centralized Intake. APS denied the complaint for investigation. Ms. DiFazio and APS also contacted law enforcement. The case was originally assigned to the Oakland County Sheriff’s Office, but it was subsequently transferred to the Michigan State Police.

On 02/09/23, I conducted an in-person interview with the licensee designee, Janet DiFazio. Ms. DiFazio stated that Tyeshia Hollins was one of the quality coordinators for Spectrum Community Services. She oversaw Groveland Home, Seven Lakes Home, and Lake Braemar Home. As of 11/21/2022, Ms. Hollins was demoted to be the home manager of Lake Braemar Home. She no longer provided oversight to Groveland Home or Seven Lakes Home. Ms. Hollins resigned from Spectrum Community Services and

stated her last day would be 12/31/22; however, she stayed on to work for a few more days due to a staff shortage. Ms. DiFazio stated that 01/05/23 was the last day Ms. Hollins worked for Spectrum Community Services. Ms. Hollins was instructed to turn in her work issued cell phone and laptop, petty cash card, gas card, and the residents' EBT cards. Around 01/10/23, Ms. DiFazio was looking through Ms. Hollins's phone and found she had pictures of some of the residents' EBT cards on her phone, including the cards belonging to Resident M and Resident N, who reside at Groveland Home. Ms. DiFazio stated that Ms. Hollins was not responsible for any of the shopping at Groveland Home. She was not aware of any time when Ms. Hollins purchased groceries or supplies for the home. The home manager, Sandy Bradley, shops for all food and supplies for the home. Ms. Bradley has worked at Groveland for over 25 years. She keeps the residents' EBT cards in a wallet in her purse. Ms. DiFazio stated that typically the EBT cards are kept locked up in the home with the petty cash, but Ms. Bradley keeps them on her person because she is "old school". Ms. DiFazio stated that after finding the photographs of EBT cards on Ms. Hollins's phone, she asked Ms. Bradley to review the most recent purchases made using Resident M and Resident N's EBT cards. There is an EBT hotline that you can call, which provides the date and amount of the last ten transactions.

Ms. Bradley identified that five of the last ten transactions on Resident M's EBT card were not made by her.

Resident M's unauthorized EBT transactions:		
Date:	Location:	Amount:
12/15/22	Meijer Instacart	\$193.21
12/17/22	Walmart (Internet)	\$54.44
12/29/22	Meijer Instacart	\$117.65
12/30/22	Aldi (Internet)	\$58.88
01/03/23	Aldi (Internet)	\$12.63
Total:		\$436.81

Ms. Bradley identified that six of the last ten transactions on Resident N's EBT card were not made by her.

Resident N's unauthorized EBT transactions:		
Date:	Location:	Amount:
12/01/22	GH Petro Mart, 9657 Gratiot	\$16.06
12/02/22	Sam's Club (Internet)	\$425.14
12/02/22	Kroger, 38051 Gratiot	\$84.12
12/02/22	Kroger, 38051 Gratiot	\$108.19
12/02/22	Mike's Fresh Market, 14383 Gratiot	\$55
12/24/22	Kroger, 20891 E. 13 Mile Rd.	\$249.76
Total:		\$938.27

Ms. DiFazio stated that Ms. Bradley changed the PIN for Resident M and Resident N's EBT cards on 01/15/23. Resident M and Resident N were the only residents from Groveland receiving food assistance benefits during this time. Ms. DiFazio stated that each resident who qualifies for assistance has a set amount that they receive for food assistance each month. During COVID, some of the residents were receiving a higher amount. The home managers can call the EBT hotline to check the balance on the EBT card. The home managers are expected to keep receipts and complete a "Food Stamps Monthly Report" form that they submit to the main office each month. The monthly report form is completed for the entire household and is not individual to each resident. It lists the residents' names, previous month's food assistance balance, new funds added, and the ending balance. The form also includes a table to record the receipt number, date of purchase, store name, the name of the resident whose benefits were used to make the purchase, and the amount of the purchase. I reviewed the monthly report forms for Groveland Home from September 2022-January 2023. The home manager was not consistently recording the previous month's balance or new funds added to each card. She did track each transaction made and attached the receipts. The majority of the purchases made by Ms. Bradley were from Kroger, Bueche's Food World, Big Lots, or Dollar General.

In reviewing a copy of Resident M's EBT transactions from August 2022 through January 2023 compared to the home's monthly report, I noted the following additional discrepancies regarding food assistance expenditures.

Resident M's unauthorized EBT transactions:		
Date:	Location:	Amount:
11/18/22	Meijer Instacart	\$288.26
11/18/22	Aldi (Internet)	\$207.66
12/15/22	Aldi (Internet)	\$148.29
Total:		\$644.21

In reviewing a copy of Resident N's EBT transactions from August 2022 through January 2023 compared to the home's monthly report, I noted the following additional discrepancies regarding food assistance expenditures.

Resident N's unauthorized EBT transactions:		
Date:	Location:	Amount:
11/04/22 2:12pm	Cash Purchase Detroit Motown	\$125
11/04/22 2:14pm	Cash Purchase Detroit Motown	\$125
11/23/22	Kroger, 9741 Dixie Hwy.	\$258
11/29/22	Kroger, 9741 Dixie Hwy.	\$90.57
11/30/22	BP, 17111 Harper	\$11.96
Total:		\$610.53

It should be noted that the Kroger located at 9741 Dixie Hwy. is the location where Ms. Bradley typically shops; however, the transactions from 11/23/22 and 11/29/22 were not listed on her November 2022 Food Stamps Monthly Report and there were no receipts from these transactions. Ms. DiFazio stated that some of the residents were also receiving cash payments on their EBT cards during COVID, so the transactions listed as “cash purchase” were likely cash withdrawals made from the card.

Ms. DiFazio stated that when Spectrum was looking into some of the suspicious activity on the residents’ EBT cards, they noticed that several of the purchases were made near the home of Tyeshia Hollins, and some were delivered to her mother’s home. Ms. DiFazio stated that on 01/18/23, she and Spectrum’s Chief Operating Officer, Sharon Blain, met with Ms. Hollins to discuss the misuse of resident funds, food stamps, and the agency gas card. They asked Ms. Hollins to provide receipts for any of the purchases that were unaccounted for, but she was unable to provide receipts. Ms. Hollins signed a payroll deduction form, authorizing Spectrum to withhold \$7882.23 from her next paychecks as reimbursement for unauthorized gas card and food stamp usage.

Ms. DiFazio stated that they turned over Ms. Hollins’s work cell phone to the police for their investigation. She provided screenshots of the pictures of Resident M and Resident N’s bridge cards which were on the phone. The PINs were written on the front of the cards with black markers. Ms. DiFazio also provided a statement from the Chief Operating Officer, Sharon Blain, which indicates that they met with Ms. Hollins along with Spectrum’s human resources director and the director of quality and compliance on 01/18/23 to discuss multiple issues of misuse of consumer funds, consumer food stamps, and the agency gas card. Ms. Hollins was told that she owed \$110 in personal funds, \$6724.06 from food stamps, and \$1048.17 from the agency gas card for a total of \$7882.23. She was asked if she had any receipts that she could produce for any of the purchases, and she did not. She was told she had 24 hours to come up with the money, but she stated that she would not be able to do so. She was provided with a payroll deduction sheet with the amount owed, which she signed.

I reviewed a copy of the written statement that Ms. Hollins provided to Spectrum on 01/18/23. It stated that she always bought groceries for the group homes and spent money out of her own pocket for the home. It notes that she shopped for all homes at one point. Then, when she was shopping only for Lake Braemar, she would order “off the app” and have it delivered or pick it up. The statement noted that she purchased numerous things for the home. The statement reads, “If we needed it, I bought it rather it was from my personal money or petty cash card. Sometimes I would just do one big order so things would last and I wasn’t constantly having to run to the store.” The statement notes that the day or two before, she bought groceries for the home and did a big Walmart order to stock the home. In December, she did a big order for the home and gifts for the residents and a small gift for staff.



I reviewed a copy of the Spectrum Community Services “Deduction from Payroll” form, which was signed by Tyeshia Hollins on 01/18/23. It states, “I, Tyeshia, hereby authorize Spectrum Community Services to deduct from my next paycheck the amount of \$7882.23 as my reimbursement for unauthorized gas card and food stamp usage. I would like the amount stated above to be equally spread over the next two payrolls.”

On 03/01/23, I conducted an unannounced onsite inspection at Groveland Home. I interviewed the quality coordinator, Constance Warren, and the home manager, Sandy Bradley. Ms. Warren stated that they have changed the food stamps monthly report to reflect one resident’s food assistance payments and expenditures. They are no longer tracking the entire home on one form. The home managers are also calling to check the balance on the EBT cards at least weekly. They have obtained a new lockbox for EBT cards, and all cards are kept locked up in the home. Ms. Bradley is the only one with access to the key.

Ms. Bradley stated that she is the primary person who purchases groceries and supplies for the home. Recently, she had one of her staff, Jaylen, shop for the home and he brought back receipts for the purchases. Ms. Bradley stated that she was out on sick leave last year for approximately six weeks during March and April 2022. During that time the home’s medication coordinator, Belinda Lillard, had the residents’ EBT cards. Ms. Lillard no longer works for Spectrum. Ms. Bradley stated that she was not aware of anyone else having access to the residents’ EBT cards. She kept them in her “work wallet” along with the petty cash card, gas card, and pizza gift cards, which she always kept with her. Ms. Bradley stated that each EBT card had the corresponding PIN written on the front of it, so that she would not have to memorize them. Ms. Bradley stated that the Spectrum administrators asked her to review the food assistance charges on Resident M and Resident N’s EBT cards due to suspicious activity. Ms. Bradley identified several purchases from December 2022 that she did not make. She stated that she could identify that the purchases were not made by her due to the dates of the purchases, amounts, and the receipts that she had to track her purchases. She stated that there were some large purchases of nearly \$500 which she did not make, as well as a purchase that was made on Christmas Eve when she would not have been shopping. Ms. Bradley stated that she typically only shops at Kroger, Big Lots, and occasionally Dollar Tree or Dollar General. She never makes purchases online or uses Instacart. Ms. Bradley stated that she had no idea what happened with the cards or how the unauthorized purchases were made. She stated that Resident M and Resident N never received new EBT cards. They had their cards when they moved into the home approximately four years ago. Ms. Bradley changed the PINs on both cards after the suspicious purchases were discovered. Ms. Bradley was not aware of a time when the quality coordinator, Tyeshia Hollins, shopped for the home.

On 03/02/23, the assigned ORR worker, Katie Garcia, and I interviewed the former quality coordinator/program manager, Tyeshia Hollins, via telephone. Ms. Hollins stated that when she quit working for Spectrum, she had a discussion with the licensee designee, Janet DiFazio, and Spectrum’s Chief Operating Office, Sharon Blain, regarding improper use of the residents’ EBT cards. She stated that they made her sign

a letter for them to take money out of her paycheck due to over usage of the agency gas card and residents' bridge cards. She stated that she signed the letter because she was frustrated and defeated with work and things going on in her personal life. She was "just ready to be done with it." Ms. Hollins stated that she was responsible for grocery shopping at Lake Braemar Home. She frequently paid for food and supplies out of her own pocket if the residents did not have enough cash or food assistance to cover their expenses. Once funds were added to their EBT cards, she would reimburse herself for the money she had spent by using their cards for personal items. She stated that she jotted this down a few times, but she did not really track it because "it became second nature." Ms. Hollins stated that she was not responsible for shopping for the residents at Groveland, but she had access to their EBT cards when the home manager, Sandy Bradley, was out sick. She stated the medication coordinator, Belinda, took pictures of the EBT cards and gave them to her so she could order food through Instacart for the home. Regarding purchases made outside of the timeframe when Ms. Bradley was on sick leave, Ms. Hollins stated that she might have made purchases in error using the wrong resident's EBT card, because Instacart saves the card information. She stated that she might have clicked on the wrong card when she was making a purchase.

On 03/09/23, I interviewed the former medication coordinator, Belinda Lillard, via telephone. Ms. Lillard stated that she worked at Groveland Home for eight years and left in September 2022. She stated that when the home manager, Sandy Bradley, was out on sick leave in March 2022, she was primarily responsible for purchasing food for the home. Sometimes they were short staffed, so another staff person, Gail Dake, would assist with shopping. Ms. Lillard stated that she physically kept the residents' EBT cards on her during that time, because Ms. Bradley usually kept them on her, and she did not want to leave them in the house. If Ms. Dake or another staff person was helping to shop, Ms. Lillard gave them the physical EBT cards, and they brought back receipts for the purchases. They never used Instacart or had groceries delivered to the home. She stated that she never took pictures of the EBT cards or texted them to anybody. She did not recall the quality coordinator, Tyeshia Hollins, dropping off groceries or having anything delivered to the home via Instacart during that time. She stated that Ms. Hollins and Ms. DiFazio visited the home a few times while Ms. Bradley was off to help get things organized. Ms. Lillard stated that there was always enough food in the home. She was not aware of and never heard anything about any staff person using residents' EBT cards to make personal purchases.

On 03/07/23, I spoke with the assigned detective from the Michigan State Police Department, Detective Sergeant Jeffrey Rodgers. He stated that he was still working on his investigation, but they would be moving forward with submitting for charges against Tyeshia Hollins, as there was clear evidence of fraud.

On 03/14/23, I conducted an exit conference via telephone with the licensee designee, Janet DiFazio. Ms. DiFazio stated that she would submit a corrective action plan to address the violations. Tyeshia Hollins is no longer employed with Spectrum, and they are implementing new procedures to ensure this does not happen again.

<b>APPLICABLE RULE</b>	
<b>R 400.14305</b>	<b>Resident protection.</b>
	(1) A resident shall be assured privacy and protection from moral, social, and financial exploitation.
<b>ANALYSIS:</b>	Based on the information gathered through my investigation, there is sufficient information to conclude that Resident M and Resident N were not protected from financial exploitation. Pictures of their EBT cards, with the PINs written on the front of the cards, were found on the cell phone of the quality coordinator, Tyeshia Hollins. Ms. Hollins was not responsible for purchasing food for the home. The home manager, licensee designee, and staff had no knowledge of Ms. Hollins ever purchasing food for the home. There were several purchases on Resident M and Resident N's EBT cards that were not made by the home manager. Spectrum's "Food Stamps Monthly Report" form was not being filled out properly or effectively, so the unauthorized transactions were not identified until the pictures of EBT cards were found on Ms. Hollins's phone and a more thorough audit was conducted. Ms. Hollins stated that she shopped for Groveland Home when the home manager was out sick, and she might have accidentally used the cards at a later date due to the information being stored online. She admitted to using the EBT cards belonging to residents at Lake Braemar Home to reimburse herself for purchases made out of pocket.
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

<b>APPLICABLE RULE</b>	
<b>R 400.14315</b>	<b>Handling of resident funds and valuables.</b>
	(10) A licensee, administrator, direct care staff, other employees, volunteers under the direction of the licensee, and members of their families shall not accept, take, or borrow money or valuables from a resident, even with the consent of the resident.
<b>ANALYSIS:</b>	Based on the information gathered through my investigation, there is sufficient information to conclude that the former quality coordinator, Tyeshia Hollins, used Resident M and Resident N's EBT cards to make personal purchases. Pictures of their EBT cards were found on Ms. Hollins's cell phone. Ms. Hollins was not responsible for purchasing food for the home. The home manager, licensee designee, and staff had no knowledge of Ms.

	<p>Hollins ever purchasing food for the home. There were several purchases on the EBT cards that were not made by the home manager. The licensee designee stated that several purchases were made near the personal residence of Ms. Hollins. Ms. Hollins stated that she shopped for the home when the home manager was out sick, and she might have accidentally used the cards at a later date due to the information being stored online. She admitted to using the EBT cards belonging to residents at Lake Braemar Home to reimburse herself for purchases made out of pocket.</p>
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**IV. RECOMMENDATION**

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



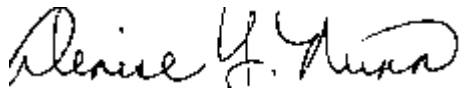
03/14/2023

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Kristen Donnay  
Licensing Consultant

Date

Approved By:



03/16/2023

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Denise Y. Nunn  
Area Manager

Date