



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 #: AS630397224
Investigation #: 2023A0991011
Lake Braemar Home

Dear Ms. Difazio:

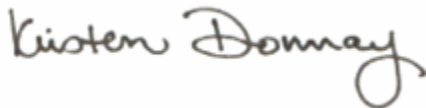
Attached is the Special Investigation Report for the above referenced facility. Due to the violations identified in the report, a written corrective action plan is required. The corrective action plan is due 15 days from the date of this letter and must include the following:

- 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".

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

License #:	AS630397224
Investigation #:	2023A0991011
Complaint Receipt Date:	01/23/2023
Investigation Initiation Date:	01/23/2023
Report Due Date:	03/24/2023
Licensee Name:	Spectrum Community Services
Licensee Address:	185 E. Main St Suite 700 Benton Harbor, MI 49022
Licensee Telephone #:	(734) 458-8729
Licensee Designee:	Janet Difazio
Name of Facility:	Lake Braemar Home
Facility Address:	1255 East Davisburg Road Holly, MI 48442
Facility Telephone #:	(248) 369-8663
Original Issuance Date:	06/06/2019
License Status:	REGULAR
Effective Date:	06/14/2022
Expiration Date:	06/13/2024
Capacity:	5
Program Type:	PHYSICALLY HANDICAPPED DEVELOPMENTALLY DISABLED MENTALLY ILL

II. ALLEGATION(S)

	Violation Established?
Unauthorized purchases were made by Spectrum’s quality coordinator, Tyeshia Hollins, using Resident M’s food assistance benefits. Resident funds were missing from the home.	Yes
Additional Findings	Yes

III. METHODOLOGY

01/23/2023	Special Investigation Intake 2023A0991011
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 Call to Adult Protective Services (APS) Centralized Intake
01/24/2023	Contact - Document Received Incident reports and food assistance documentation
01/25/2023	Contact - Document Received Email from APS- denied complaint for investigation- referred back to licensing and law enforcement
02/09/2023	Inspection Completed On-site Interviewed licensee designee, Janet DiFazio
02/09/2023	Contact - Document Received Funds Part II forms, statements, and food assistance documentation
03/02/2023	Contact - Telephone call made To ORR worker, Katie Garcia
03/02/2023	Contact - Telephone call made Interviewed former quality coordinator, Tyeshia Hollins

03/02/2023	Contact - Telephone call made Left message for assigned detective
03/07/2023	Contact - Telephone call received From assigned detective, Detective Sergeant Jeffrey Rodgers, with state police
03/07/2023	Contact - Telephone call made To licensee designee, Janet DiFazio
03/08/2023	Contact - Telephone call received From assigned ORR worker, Katie Garcia
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’s food assistance benefits. Resident funds were missing from the home.

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, was recently terminated from Spectrum. Upon looking through her work issued cell phone, they found Ms. Hollins had pictures of residents’ electronic benefit transfer cards (EBT/bridge cards) 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 Lake Braemar Home, Groveland Home, and Seven Lakes Home to make personal purchases. Personal funds belonging to the residents of Lake Braemar Home were also missing from the home. Resident C was missing \$41, Resident P was missing \$63, and Resident M was missing \$6. I created a special investigation intake, which was assigned to me for investigation. Ms. DiFazio stated that due to a staffing shortage, the residents at Lake Braemar Home were temporarily moved to other homes. 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 referred the complaint to 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, at Lake Braemar Home. Ms. DiFazio stated that Tyeshia Hollins was one of the

quality coordinators for Spectrum Community Services. She oversaw Lake Braemar Home, Groveland Home, and Seven Lakes 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 card belonging to Resident M, who resided at Lake Braemar Home. Ms. DiFazio stated that Ms. Hollins was primarily responsible for the grocery shopping at Lake Braemar Home. The expectation was that Ms. Hollins or staff would bring the residents to the store when they went grocery shopping as a community outing.

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.

Ms. DiFazio stated that after Tyeshia Hollins left Spectrum, she could not locate Resident C or Resident M's EBT cards at Lake Braemar Home. There were no receipts or monthly tracking forms for food assistance usage for Lake Braemar Home. Ms. DiFazio stated that Spectrum conducts audits quarterly regarding food stamp usage. An audit was completed at the end of August 2022 at Lake Braemar Home and there were receipts to support the purchases. From August 2022-January 2023 an audit was not completed, and no documentation could be located. Ms. DiFazio stated that each home manager has access to a petty cash card that they can use to purchase supplies and food for the home that is not covered by the residents' funds or food assistance. In October 2022, Spectrum reduced the amount on the petty cash cards from \$2500 per month to \$500 per month. There were a few occasions when staff contacted Ms. DiFazio because they were running low on food or supplies. She stated that she would spend a few hundred dollars to have food or supplies sent to the home. If staff spend money out of pocket on items for the home or residents, they can submit a reimbursement form to Spectrum for the purchases.

Ms. DiFazio stated that Spectrum did an audit of Resident M's posted transactions for purchases made with his food assistance benefits. They flagged the following transactions as being suspicious:

Resident M's Unauthorized EBT Transactions		
Date:	Location:	Amount:
08/10/22	Bridge Lake Market, 9420 Dixie	\$8.35
08/12/22	Save A Lot, 4703 Conner	\$365.77
08/22/22	Save A Lot, 4703 Conner	\$114.53
08/25/22	Save A Lot, 4703 Conner	\$216.29
08/27/22	Save A Lot, 4703 Conner	\$171.85
08/27/22	Public Foods, 16226 E. Warren	\$48.19
09/03/22	Save A Lot, 4703 Conner	\$86.76
09/03/22	Save A Lot, 4703 Conner	\$61.45
09/25/22	Save A Lot, 4703 Conner	\$34.26
10/22/22	Kroger, 22801 Harper Ave.	\$246.40
10/24/22	Save A Lot, 4703 Conner	\$190.00
12/27/22	Meijer Instacart	\$214.23
12/28/22	Walmart (Internet)	\$7.46
Total:		\$1765.54

Ms. DiFazio stated that many of the purchases were made at locations near Ms. Hollins's home or the home of her relatives. Ms. DiFazio stated that she could not be sure if Ms. Hollins shopped near her home and later delivered the groceries to Lake Braemar, but there were no receipts for any of the transactions. During a review of the transactions with Ms. DiFazio during the onsite inspection, a few of the transactions that were originally flagged as suspicious by Spectrum were removed from the list as they were made at a location near Lake Braemar Home or because the charges were reversed or duplicated on the list.

Ms. DiFazio stated that after Ms. Hollins left Spectrum, they could not locate any of the residents' funds that they should have had in cash on hand. Tyeshia Hollins was the only person who had access to the resident funds. The cash was kept in a locked cabinet in the living room and Ms. Hollins was the only person who had a key to the cabinet. When Ms. DiFazio asked Ms. Hollins about the resident funds, Ms. Hollins stated that the cash was in the home; however, it was never located. Resident M was supposed to have \$6.06, but only had \$0.06. Ms. DiFazio reimbursed Resident M the \$6 and added an additional \$20 to his cash on hand, so he now has \$26.06. Resident C was supposed to have \$45.08 but had no cash. Resident P was supposed to have \$64.70 but had no cash. Ms. DiFazio reimbursed both Resident C and Resident P for the missing cash on hand. I reviewed their Funds Part II forms and cash on hand during the onsite inspection on 02/09/23 and there were no current discrepancies.

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's bridge card which was on the phone. 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. The statement notes that she left "a bunch of receipts" at the home and there should have been copies on the desk, as well as actual receipts.

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 03/02/23, 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 when she left Spectrum, all of the

resident funds were at Lake Braemar Home. She stated there was around \$100 in cash and all of the receipts were with the resident funds. She did not know why the funds could not be located after she left.

Ms. Hollins stated that she was responsible for grocery shopping at Lake Braemar Home. Everyone had access to the residents' bridge cards and the petty cash card, as they were kept in the medication cart at all of the Spectrum homes. Ms. Hollins stated that she ordered groceries through Instacart and had them delivered to where she was or to Lake Braemar. Sometimes she would grab a few things for herself and the other stuff she brought to the house. 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 Spectrum reduced the amount on the petty cash card to \$500 a month and it was not enough to cover groceries and additional supplies for the residents. There was also a period when Lake Braemar did not have a petty cash card, because they were changing the limits and reissuing the card. She told Ms. DiFazio that it was not enough for the home's expenses, and she was told, "just make it work." Management frequently told staff to pay for items and they would be reimbursed, but they never got reimbursed. Ms. Hollins stated that there were purchases made for herself using the residents' EBT cards, but she was just reimbursing herself. There were times when she would use her sister's EBT card to buy food for the home, because the residents did not have funds yet. Once their funds were added, she would reimburse herself. She always made sure the food was stocked and the residents had what they needed. She stated that she quit working for Spectrum because she was tired. She felt like she was constantly giving, and it was not being recognized. She was a salaried employee, so she was paid for 80 hours each pay period, but she was working over 100 hours a week and was not being compensated. She stated that she went above and beyond when she was working for Spectrum. She came out of pocket for groceries and clothes and was never reimbursed by Spectrum. She stated that she treated Resident M like he was her own child. Resident M's parents were supposed to drop off briefs and wipes for him, but often they did not. She would pay out of pocket for these supplies.

Ms. Hollins stated that she reimbursed herself from the residents' cash on hand once or twice. She stated that she bought Resident C pajamas and a Roku stick to stream television/movies. She paid out of pocket for these items, so she reimbursed herself from Resident C's funds. There was also a time when she paid out of pocket for a pizza party for the residents, so she reimbursed herself from the residents' cash.

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 charges as there was clear evidence of fraud.

APPLICABLE RULE	
R 400.14305	Resident protection.
	(1) A resident shall be assured privacy and protection from moral, social, and financial exploitation.
ANALYSIS:	Based on the information gathered through my investigation, there is sufficient information to conclude that Resident M was not protected from financial exploitation. A picture of Resident M's EBT card was found on the cell phone of the quality coordinator, Tyeshia Hollins. Ms. Hollins was responsible for grocery shopping for Lake Braemar Home and had access to Resident M's EBT card for that purpose. However, she did not have any receipts for purchases made with the EBT card from August 2022-January 2023. Spectrum's "Food Stamps Monthly Report" was not completed, or could not be located, for the residents at Lake Braemar Home. There were numerous purchases on Resident M's EBT card that were flagged as suspicious by the administrative team at Spectrum Community Services. Ms. Hollins admitted to using the EBT cards belonging to residents at Lake Braemar Home to make personal purchases, because she was reimbursing herself for purchases made out of pocket for the home. She did not keep track of these purchases and stated that it "became second nature." Ms. Hollins also admitted to "reimbursing" herself once or twice from resident funds.
CONCLUSION:	VIOLATION ESTABLISHED

APPLICABLE RULE	
R 400.14315	Handling of resident funds and valuables.
	(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.
ANALYSIS:	Based on the information gathered through my investigation, there is sufficient information to conclude that the former quality coordinator, Tyeshia Hollins, used Resident M's EBT card to make personal purchases. A picture of Resident M's EBT card was found on Ms. Hollins's cell phone. There were numerous purchases on Resident M's EBT card that were flagged as suspicious by the administrative team at Spectrum Community

	Services. The licensee designee stated that several purchases were made near the personal residence of Ms. Hollins. Ms. Hollins admitted to using the EBT cards belonging to residents at Lake Braemar Home to reimburse herself for purchases made out of pocket. In addition, resident funds for Resident C, Resident M, and Resident P could not be located at Lake Braemar after Ms. Hollins quit. Ms. Hollins admitted to “reimbursing” herself from resident funds on one or two occasions. She did not track any of the purchases that she made out of pocket for which she reimbursed herself, and no receipts could be located at Lake Braemar Home.
CONCLUSION:	VIOLATION ESTABLISHED

ADDITIONAL FINDINGS:

INVESTIGATION:

During the onsite inspection at Lake Braemar Home, I reviewed the Funds Part II forms for Resident C, Resident M, and Resident P. Resident P’s Funds Part II form showed that he had \$257.64 in cash on hand from 11/02/22 until 12/01/22. He received an additional \$88 and had \$345.64 in cash on hand until his funds were spent throughout December.

Resident M’s Funds Part II form showed that as of 10/17/22, he had \$6.06 in cash on hand until 02/01/23 when the licensee designee, Janet DiFazio, provided an additional \$20 for his funds.

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.

APPLICABLE RULE	
R 400.14315	Handling of resident funds and valuables.
	(6) Except for bank accounts, a licensee shall not accept resident funds of more than \$200.00 for any resident of the home after receiving payment of charges owed.
ANALYSIS:	Based on the information gathered through my investigation, there is sufficient information to conclude that Resident P had more than \$200 in cash on hand from November until December 2022. Resident P’s Funds Part II form showed that he had \$257.64 in cash on hand from 11/02/22 until 12/01/22. He

	received an additional \$88 and had \$345.64 in cash on hand until his funds were spent throughout December.
CONCLUSION:	VIOLATION ESTABLISHED

APPLICABLE RULE	
R 400.14315	Handling of resident funds and valuables.
	(7) A resident shall have access to and use of personal funds that belong to him or her in reasonable amounts, including immediate access to not less than \$20.00 of his or her personal funds. A resident shall receive up to his or her full amount of personal funds at a time designated by the resident, but not more than 5 days after the request for the funds. Exceptions to this requirement shall be subject to the provisions of the resident's assessment plan and the plan of services.
ANALYSIS:	Based on the information gathered through my investigation, there is sufficient information to conclude that Resident M did not have access to \$20 of personal funds. Resident M's Funds Part II form showed that as of 10/17/22, he had \$6.06 in cash on hand until 02/01/23 when the licensee designee, Janet DiFazio, provided an additional \$20 for his funds.
CONCLUSION:	VIOLATION ESTABLISHED

IV. RECOMMENDATION

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

Kristen Donnay

03/14/2023

Kristen Donnay
Licensing Consultant

Date

Approved By:

Denise Y. Nunn

03/16/2023

Denise Y. Nunn
Area Manager

Date