



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 #: AS630397257
Investigation #: 2023A0991012
Seven Lakes 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 #:	AS630397257
Investigation #:	2023A0991012
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:	Seven Lakes Home
Facility Address:	2332 Grange Hall Road Fenton, MI 48439
Facility Telephone #:	(248) 634-3914
Original Issuance Date:	06/06/2019
License Status:	REGULAR
Effective Date:	12/06/2021
Expiration Date:	12/05/2023
Capacity:	6
Program Type:	PHYSICALLY HANDICAPPED DEVELOPMENTALLY DISABLED MENTALLY ILL TRAUMATICALLY BRAIN INJURED ALZHEIMERS AGED

II. ALLEGATION(S)

	Violation Established?
Unauthorized purchases were made by Spectrum’s quality coordinator, Tyeshia Hollins, using Resident N and Resident Q’s food assistance benefits.	Yes

III. METHODOLOGY

01/23/2023	Special Investigation Intake 2023A0991012
01/23/2023	Special Investigation Initiated - Telephone Call to licensee designee, Janet DiFazio
01/23/2023	Contact - Telephone call made To Office of Recipient Rights (ORR) worker, Katie Garcia
01/23/2023	Referral - Recipient Rights Referred allegations to recipient rights
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 for investigation, referred back to licensing and law enforcement
02/09/2023	Contact - Face to Face With licensee designee, Janet DiFazio at Lake Braemar
02/09/2023	Contact - Document Received Supporting documentation re: food assistance
03/01/2023	Inspection Completed On-site Unannounced onsite inspection at Seven Lakes Home
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 Interviewed team lead, Bobby Hysell
03/02/2023	Contact - Telephone call made Left message with assigned detective from state police
03/07/2023	Contact - Telephone call received From assigned detective
03/07/2023	Contact - Telephone call made To licensee designee, Janet DiFazio
03/08/2023	Contact - Telephone call received From 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 N and Resident Q’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, 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 Seven Lakes Home, Groveland 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 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 Seven Lakes Home, Groveland 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 Seven Lakes Home or Groveland 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 N and Resident Q, who reside at Seven Lakes Home.

Ms. DiFazio stated that Ms. Hollins was not responsible for any of the shopping at Seven Lakes Home. Bobby Hysell, the team lead at Seven Lakes Home, typically does the shopping for the home. Mr. Hysell went on vacation in July 2022. During that time, he gave the keys for the cabinet where resident funds and EBT cards were kept to the quality coordinator, Tyeshia Hollins. Ms. DiFazio stated that Ms. Hollins was also in possession of EBT cards for Resident N and Resident Q when new cards were delivered. When new EBT cards are issued, they come in the mail to Spectrum's main office. The cards are given to the quality coordinator, Ms. Hollins, to deliver to the home managers. Ms. DiFazio stated that Mr. Hysell reported there was a lengthy delay before he received the EBT cards from Ms. Hollins. He stated that he never received Resident N's EBT card. Ms. DiFazio stated that after finding the photographs of EBT cards on Ms. Hollins's phone, she asked Mr. Hysell to review the most recent purchases made using the residents' EBT cards. There is an EBT hotline that you can call, which provides the date and amount of the last ten transactions. No suspicious activity was noted on Resident B or Resident R's EBT cards. These two residents never received new EBT cards, and their cards were always locked in the home or in Mr. Hysell's possession.

Mr. Hysell identified the following transactions made with Resident N's EBT card, which were not made by him. Spectrum could not access Resident N's EBT account online, so the location of the purchases could not be determined.

Resident N's unauthorized EBT transactions:	
Date:	Amount:
10/29/22	\$72.14
10/29/22	\$34.57
10/29/22	\$30.07
11/23/22	\$135.09
11/26/22	\$92.84
12/02/22	\$17.03
12/11/22	\$41.33
12/22/22	\$65.59
12/31/22	\$118.92

01/07/23	\$105.54
Total:	\$713.12

Mr. Hysell and the Spectrum administrative team identified the following transactions made with Resident Q's EBT card, which were not made by Mr. Hysell.

Resident Q's unauthorized EBT transactions:		
Date:	Location:	Amount:
09/27/22	Cash Withdrawals (\$125 x 3 & \$50)	\$410
10/10/22	Joe Randazzo's Fruit	\$51.58
10/10/22	Sam's Club	\$82.17
10/10/22	Meijer, 1005 E. Thirteen Mile Rd.	\$37.64
10/11/22	Sam's Club	\$6.98
10/12/22	Sam's Club- 31720 Gratiot	\$2.48
10/14/22	Sam's Club	\$11.69
10/14/22	Dream Market- 40832 Ryan Rd.	\$5.85
10/23/22	Walmart, 28804 Gratiot Av.	\$141.38
10/23/22	Mr. C's Fresh Fish, 18203 McNichols	\$58.00
12/05/22	Fenkell Fuel Mart, 15180 Telegraph	\$14.00
12/10/22	Meijer, 21431 Grand River	\$153.55
12/11/22	Rivertown Market, 1475 E. Jefferson	\$53.13
12/21/22	Meijer, 29505 Mound Rd.	\$179.71
01/05/23	Aldi, 475 Brown Rd.	\$87.26
01/05/23	Kroger, 3097 Baldwin Rd.	\$38.51
Total:		\$1333.93

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. Ms. DiFazio stated that some of the residents were also receiving cash payments on their EBT cards during COVID, so there were also three cash withdrawals made from Resident Q's card. The home managers can call the EBT hotline to check the balance on the EBT card. The home managers are also 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 Seven Lakes Home from September 2022-January 2023, which were completed by the team lead, Mr. Hysell. Mr. Hysell tracked the purchases made with each resident's EBT card every month and attached the corresponding receipts. He was not consistently recording the previous month's balance or new funds added to each card. The majority of the purchases made by Mr. Hysell were from Holly Foods or Walmart in Fenton. No purchases were made by Mr. Hysell with Resident N's EBT card after 09/27/22.

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 N and Resident Q's bridge cards which were 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.

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 Seven Lakes Home. I interviewed direct care worker, Linda Eisner. Ms. Eisner stated that the team lead, Bobby Hysell, is the only one who shops for the home. Occasionally, he sends staff out to shop, but it is usually for hygiene products which they use the petty cash card to purchase. Ms. Eisner stated that she was not aware of anyone using the residents' EBT

cards inappropriately. She stated that the quality coordinator, Tyeshia Hollins, never brought groceries or supplies to the home. She only did the grocery shopping for Lake Braemar Home. Ms. Eisner was not sure if Ms. Hollins had access to the residents' EBT cards. She stated that Mr. Hysell went on vacation, and gave the cards to someone else, but she was not sure who. Typically, Mr. Hysell keeps the cards locked in a cupboard in the office. He is the only one with a key.

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. 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. 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.

Ms. Hollins stated that she was not responsible for purchasing groceries for the Seven Lakes Home. She stated that she shopped for the home once or twice when Mr. Hysell was out. Staff called her and said they needed stuff. She stated that 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 did not recall whose EBT cards she used from Seven Lakes Home. Ms. Hollins also 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 03/02/23, the assigned ORR worker, Katie Garcia, and I interviewed Bobby Hysell via telephone. Mr. Hysell stated that the administrative team from Spectrum notified him

that there was suspected fraud on some of the residents' EBT cards and asked him to check the most recent transactions. Resident N and Resident Q had several transactions that were not made by Mr. Hysell. Resident B and Resident R did not have any suspicious activity on their cards, but Mr. Hysell stated that their cards were always in the home. Resident Q and Resident N received new EBT cards. The quality coordinator, Tyeshia Hollins, was supposed to deliver the cards to Mr. Hysell. The administrator, Kim Martin, called Mr. Hysell several times to see if he received the EBT cards, but he had not yet received them. Ms. Martin ended up cancelling the cards and having new ones issued. Mr. Hysell stated that after the new cards were issued, weeks went by before he received them. He stated that he was initially supposed to receive the cards in July, but he did not get them until November.

Mr. Hysell stated that he always keeps the EBT cards and the petty cash card locked in a cabinet in his office. Prior to the fraudulent activity, the PINs were written down and kept with the EBT cards. He now keeps the PINs in a separate location from the cards. Mr. Hysell is the only one with a key to the cabinet. Mr. Hysell stated that the EBT cards were never stored in the medication cart at Seven Lakes Home. Mr. Hysell stated that he is the only one who shops for the home. He typically shops at Holly Food or Walmart in Fenton with the residents' EBT cards. He shops at Dollar Tree or Family Dollar with the petty cash card. Mr. Hysell stated that he occasionally pays for a few items out of pocket, such as coffee filters, which cannot be purchased with an EBT card. He just takes it as a loss and has never asked for reimbursement or reimbursed himself using the residents' funds. He stated that he was never told to spend his own money for groceries or supplies, and Spectrum would reimburse him if he asked. He stated that he has enough to cover the home's expenses with the petty cash card and EBT cards. He watches his spending and makes it work.

Mr. Hysell stated that he went on vacation twice in 2022. In July, he gave the key to the cabinet where funds and EBT cards are stored to Ms. Hollins. He stated that in November, around Thanksgiving time, he was off, but he did not give the key to Ms. Hollins. She was at the house during that time, but he was not sure if she bought anything for the residents while he was on vacation. He stated that he tried to stock the house with food before he left. Mr. Hysell stated that there was never a time when Ms. Hollins was responsible for purchasing food for the Seven Lakes Home.

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 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.

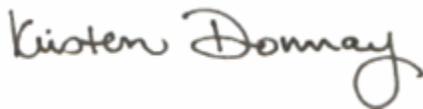
APPLICABLE RULE	
R 400.14305	Resident protection.
	(1) A resident shall be assured privacy and protection from moral, social, and financial exploitation.
ANALYSIS:	Based on the information gathered through my investigation, there is sufficient information to conclude that Resident N and Resident Q were not protected from financial exploitation. Pictures of Resident N and Resident Q's EBT cards were found on the cell phone of the quality coordinator, Tyeshia Hollins. Ms. Hollins was not responsible for purchasing food for Seven Lakes Home. The team lead, licensee designee, and staff had no knowledge of Ms. Hollins ever purchasing food for the home. There were several purchases on Resident N and Resident Q's EBT cards that were not made by the team lead, Bobby Hysell, who is responsible for shopping at Seven Lakes. 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 Seven Lakes Home once or twice when Mr. Hysell was on vacation, 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, but she did not have any receipts or documentation to support this claim.
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 Q and Resident N's EBT cards to make personal purchases. Pictures of their EBT

	<p>cards were found on Ms. Hollins's cell phone. Ms. Hollins was not responsible for purchasing food for the home. The team lead, licensee designee, and staff had no knowledge of Ms. Hollins ever purchasing food for the home. There were several purchases on the EBT cards that were not made by the team lead. 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 team lead was on vacation, 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>
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.

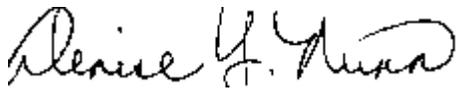


03/14/2023

Kristen Donnay
Licensing Consultant

Date

Approved By:



03/16/2023

Denise Y. Nunn
Area Manager

Date