



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

ORLENE HAWKS  
DIRECTOR

June 22, 2023

Pamela Hurley  
Innovative Lifestyles, Inc.  
PO Box 1258  
Clarkston, MI 48347

RE: License #: AS630074810  
Investigation #: 2023A0612025  
Kurtz Home

Dear Mrs. Hurley:

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 "Johnna Cade".

Johnna Cade, Licensing Consultant  
Bureau of Community and Health Systems  
Cadillac Place  
3026 W. Grand Blvd. Ste 9-100  
Detroit, MI 48202  
Phone: 248-302-2409

enclosure

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

**I. IDENTIFYING INFORMATION**

<b>License #:</b>	AS630074810
<b>Investigation #:</b>	2023A0612025
<b>Complaint Receipt Date:</b>	05/30/2023
<b>Investigation Initiation Date:</b>	05/30/2023
<b>Report Due Date:</b>	07/29/2023
<b>Licensee Name:</b>	Innovative Lifestyles, Inc.
<b>Licensee Address:</b>	Suite 1 5490 Dixie Hwy Waterford, MI 48329
<b>Licensee Telephone #:</b>	(248) 623-8898
<b>Administrator:</b>	Pamela Hurley
<b>Licensee Designee:</b>	Pamela Hurley
<b>Name of Facility:</b>	Kurtz Home
<b>Facility Address:</b>	1499 Kurtz Road Holly, MI 48442
<b>Facility Telephone #:</b>	(810) 373-6123
<b>Original Issuance Date:</b>	01/15/1997
<b>License Status:</b>	REGULAR
<b>Effective Date:</b>	08/22/2021
<b>Expiration Date:</b>	08/21/2023
<b>Capacity:</b>	6
<b>Program Type:</b>	PHYSICALLY HANDICAPPED DEVELOPMENTALLY DISABLED

## II. ALLEGATION(S)

	<b>Violation Established?</b>
<ul style="list-style-type: none"> <li>Home manager, Brittany Rogers, and/or assistant home manager, Crystal Lewis, were involved in improper food stamp usage for Resident A who died in February 2022.</li> <li>Home manager, Brittany Rogers used Resident B's personal funds to buy charms for Croc shoes for herself.</li> </ul>	Yes
<ul style="list-style-type: none"> <li>On 06/01/23, direct care staff, Denise Larowe failed to administer Resident C's 8:00 pm medications.</li> </ul>	Yes

## II. METHODOLOGY

05/30/2023	Special Investigation Intake 2023A0612025
05/30/2023	Special Investigation Initiated - Letter I made a referral to the Office of Recipient Rights (ORR) via email.
05/31/2023	APS Referral Recipient Rights Specialist, Katie Garcia made a referral to Adult Protective Services (APS) via centralized intake.
06/02/2023	Contact – Document Received I received an Incident Report regarding Resident C's medications.
06/05/2023	Contact - Telephone call made Telephone interview completed with area manager, Michelle Bailey
06/05/2023	Contact - Telephone call made Telephone interview completed with home manager, Brittany Rogers, and assistant home manager, Crystal Lewis.
06/05/2023	Contact – Document Received I received two pictures via text message of Resident B's and home manager, Brittany Rogers Crocs shoes.
06/06/2023	Inspection Completed On-site I completed an unannounced onsite investigation. I interviewed direct care staff Lashanda Marve, area manager Debbie Mcorris, Resident B, Resident C, Resident D, and Resident E.

06/06/2023	Contact - Document Received I received and reviewed the following documentation: Resident A's DHHS notice of case action, Resident C's June 2023 Medication Administration Record, Crystal Lewis and Brittany Rogers separation forms, Resident B's Resident Funds Part II form and associated receipts.
06/12/2023	Contact – Telephone call made Telephone interview completed with direct care staff, Denise Larowe.
06/14/2023	Exit Conference Telephone call licensee designee Pam Hurley to conduct an exit conference.

**ALLEGATION:**

- **Home manager, Britany Rogers, and/or assistant home manager, Crystal Lewis, were involved in improper food stamp usage for Resident A who died in February 2022.**
- **Home manager, Brittany Rogers used Resident B's personal funds to buy charms for Croc shoes for herself.**

**INVESTIGATION:**

On 05/30/23, I received an intake that was created following the receipt of an Incident report regarding the allegation. The intake indicated home manager, Brittany Rogers, and assistant home manager, Crystal Lewis, were involved in improper food stamp usage for Resident A who died in February 2022. On 05/30/23, I initiated my investigation by making a referral to the Office of Recipient Rights (ORR) via email. Recipient Rights Specialist, Katie Garcia stated recipient rights will not be investigating this allegation. On 05/31/23, Ms. Garcia made a referral to Adult Protective Services (APS). I received written notification from APS that indicated the referral was denied. On 06/01/23, I received an additional intake that indicated assistant home manager, Crystal Lewis reported that home manager, Brittany Rogers used Resident B's personal funds to buy charms for Croc shoes for herself. The intake further indicated it was confirmed that Resident B only has 15 of the 27 charms that were purchased. On 06/02/23, I received an Incident report that indicated on 06/01/23, direct care staff Denise Larowe failed to administer Resident C's 8:00 pm medications. Following the receipt of the Incident report the allegation was added to this investigation.

On 05/30/23, I reviewed an Incident report (IR) that indicated Innovative Lifestyles, Inc received an anonymous letter via US Mail that indicated one of their staff has a welfare fraud case against them involving Resident A who passed away in February 2022. The handwritten anonymous letter was attached to the IR. The letter also Included a printed

picture of a welfare dept payment/ receipt addressed to Brittany Rogers. The IR indicated that, Ms. Rogers admitted that she and assistant home manager, Crystal Lewis used the deceased residents (Resident A's) food stamp card to purchase groceries for the Kurtz home after the resident died. Ms. Rogers further admitted that she used the food stamp card for her own gain as well. Two private investigators showed up to the Kurtz home and informed her that she was caught on camera using the food stamp card. Ms. Rogers was instructed that she had to repay the funds or serve jail time. I reviewed the Department of Health and Human Services (DHHS) welfare dept payment/receipt addressed to Brittany Rogers. Ms. Rogers made a payment of \$100.00 on 10/06/2022. The balance amount is \$1,982.58. Another payment of \$150.00 was made on 02/28/23. The balance amount is \$1,732.58.

On 06/05/23, I interviewed area manager, Michelle Bailey via telephone. Ms. Bailey stated Innovative Lifestyles, Inc received an anonymous letter via US mail that indicated one of their staff has a welfare fraud case against them involving Resident A who passed away in February 2022. Innovative Lifestyles investigated this allegation. Ms. Rogers reported that Ms. Lewis "talked her into" using Resident A's food stamp card to stock up food at the Kurtz house. Ms. Rogers said she was caught on video surveillance using the card and investigators showed up and informed Ms. Rogers that the funds needed to be repaid or she would serve jail time. Ms. Rogers was the home manager. The home manager is responsible for the resident's food stamp cards as they typically do the grocery shopping for the home. The home manager can assign a staff member to do the shopping if needed. The food stamp cards are kept in the home.

Regarding Resident B's Croc charms, Ms. Bailey stated Resident B's relative is his representative payee. The representative payee sent money to Ms. Rogers to spend on Resident B. Ms. Rogers used Resident B's personal funds to buy charms for Croc shoes for herself. Ms. Bailey stated Resident B only has 15 of the 27 charms that were purchased. Ms. Bailey stated she and office manager, Marcy completed an audit of all resident funds in the home. There are no concerns that any other resident's funds have been misused.

On 06/05/23, I interviewed assistant home manager, Crystal Lewis via telephone. Ms. Lewis began her employment with the company on January 5, 2022. She was terminated May 30, 2023. Ms. Lewis stated home manager, Brittany Rogers committed welfare fraud and she had been looking for a way to prove it to her employer. Initially, she wanted to remain anonymous however, Ms. Lewis stated she mailed a letter to Innovative Lifestyles, Inc to make them aware of the issue. Ms. Lewis explained, on an unknown dated in August 2022 while she was working on shift at the Kurtz home two "bounty hunters" came to the door and spoke to Ms. Rogers outside. At the time, she did not know why they were at the home or what they spoke to Ms. Rogers about. A few days later, Ms. Rogers told her that they came to the home with pictures of her using Resident A's food stamp card after Resident A died and she had to pay back the money. Ms. Lewis stated while she was working at the home, she had gone grocery shopping with Ms. Rogers several times. When the home manager or the assigned staff went shopping for groceries, they used the resident's food stamp cards to pay at check

out. Ms. Lewis was not aware of which resident's food stamp card Ms. Rogers used for payment when they went shopping. The food stamp cards were kept locked in a cabinet drawer. Ms. Lewis stated there were occasions when she went shopping for the home using the resident's food stamp cards however, Resident A's card was never in the pouch with all the other resident's food stamp cards. Therefore, Ms. Lewis denied that she has ever used Resident A's food stamp card at any time.

Ms. Lewis stated the Kurtz home never had an adequate food supply and therefore she believes Ms. Rogers was using Resident A's food stamp card for personal gain and not to buy groceries for the home. Ms. Lewis stated there have been time that she has gone to the food bank to get food for the Kurtz home because there was not enough. Ms. Lewis stated she informed area manager, Michelle Bailey of this concern and was told by Ms. Bailey that getting food from the food bank was fine, but Ms. Rogers needs to learn to budget better when doing the shopping for the home, so this was not an ongoing issue.

Ms. Lewis stated approximately 30 days ago, Ms. Rogers also misused Resident B's personal funds. Resident B's sister sent him \$500 - \$600 dollars via check as he needed to spend down some of his personal funds. Ms. Rogers went to the store and bought Resident B a pair of Croc shoes and charms to put on the shoes. When she returned to the Kurtz home with these items Ms. Lewis stated she could tell that some of the Croc charms were missing from the package. She then observed the charms that were missing from the package in Ms. Roger's Croc shoes. Ms. Lewis stated she took pictures of both Resident B's and Ms. Roger's Croc shoes. Ms. Lewis stated that she made several attempts to contact area manager, Michelle Bailey to inform her of this issue however, Ms. Bailey did not respond to her calls.

On 06/05/23, I interviewed home manager, Brittany Rogers. Ms. Rogers began her employment with the company in 2018. She was terminated on May 30, 2023. Ms. Rogers stated a year ago she and assistant home manager, Crystal Lewis used Resident A's food stamp card after Resident A died. Resident A died in February 2022. Ms. Rogers stated she used the food stamp card in April 2022 and May 2022. Ms. Rogers stated initially, she used Resident A's food stamp card to purchase groceries for the Kurtz home. Then, she "got greedy" and used the food stamp card for her personal use. Two men from the Department of Health and Human Services (DHHS) showed up to the Kurtz home and interviewed her. She was informed that she was caught on camera using Resident A's food stamp card and she could either pay the money back or they would take her to jail. Ms. Rogers explained although she did not use all the funds that were on the food stamp card, she has to pay them all back in the amount of \$2,200. Ms. Rogers started making payments in October 2022. The total amount owed is now \$1,732. Ms. Rogers estimated that she used the card approximately seven times. Spending approximately \$800 on groceries for the Kurtz home. However, she does not have any receipts for any of the purchases that she made. Ms. Rogers stated DHHS told her that her employer would not be notified of what had occurred. Ms. Rogers stated that she did not inform her employer about what had occurred. Ms. Rogers explained that she used Resident A's Food stamp card at Sams Club and

Walmart. During check out, Ms. Lewis swiped the food stamp card for payment while shopping at Sams Club. However, Ms. Lewis was not caught and is not in trouble with DHHS.

Regarding Resident B, Ms. Rogers stated Resident B had to spend down his funds. She and direct care staff, Kaylee Osborn went to the store and purchased Resident B Croc shoes and charms to go on the shoes. The store had a deal that if you buy a certain number of charms, you get some free. Ms. Rogers stated she spent between \$80 – \$140. The charms were in a bag in Resident B's bedroom. Ms. Rogers denied taking any of the charms that were purchased for her personal use. Ms. Rogers denied seeing Ms. Osborn take any of the charms for her personal use. Ms. Rogers denied that she or Ms. Osborn made any personal purchases while in the Croc store.

On 06/06/23, I completed an unannounced onsite investigation. I interviewed direct care staff Lashanda Marve, area manager Debbie Mcorris, Resident B, Resident C, Resident D, and Resident E. While onsite I reviewed Resident A's DHHS notice of case action, home manager Crystal Lewis and assistant home manager Brittany Rogers separation forms, Resident B's Resident Funds Part II form and associated receipts, and I observed that the home had an adequate food supply including refrigerated and dry goods.

On 06/06/23, I interviewed direct care staff Lashanda Marve. Ms. Marve started her employment on October 25, 2023. She works on the midnight and day shift. Ms. Marve stated she never met Resident A and she was not aware that her food stamp card was being used improperly. Ms. Marve stated the food stamp cards are kept in a locked drawer in the office. Ms. Marve stated the home is appropriately stocked with food.

Regarding Resident B, Ms. Marve stated on an unknown date while she was on shift, home manager, Ms. Rogers used Resident B's money to purchase Resident B Croc shoes and charms to go on the shoes. When Ms. Rogers returned to the home with the purchases, assistant home manager, Ms. Lewis looked over the receipt, and noticed that not all the charms that were purchased were on Resident B's shoes. The charms that were not on Resident B's Crocs were in Ms. Rogers Crocs. Ms. Marve stated she observed the receipt and Ms. Rogers Crocs. She witnessed multiple charms that were on the receipt in Ms. Rogers black Croc shoes that she had worn to work. Ms. Marve stated Ms. Lewis took a picture of Resident B's and Ms. Rogers Croc shoes.

On 06/06/23, I interviewed area manager Debbie Mcorris. Ms. Mcorris stated Ms. Lewis and Ms. Rogers have been terminated. She has no additional information regarding these allegations.

On 06/06/23, I interviewed Resident B. Resident B was minimally verbal. Resident B was observed laying in his bed. Resident B was not aware that he had Croc shoes and was further unable to identify what charms were on his shoes. I observed one black pair of Croc shoes in Resident B's bedroom closet. There were 15 charms on the shoes.



On 06/06/23, I observed Resident C and Resident D in their home. Both residents are nonverbal and were therefore, unable to be interviewed for this investigation. On 06/06/23, I observed Resident E at his home. Resident E was engaging in an individual planning meeting with his supports coordinator and was therefore, unable to be interviewed.

On 06/05/23, I observed a photo of Resident B’s Crocs. The shoes are black and have a total of 15 charms. The charms are as followed: Letters C, H, U, C, K, bowling ball, golf clubs, pink donut, candy bear, football, mom heart tattoo, coffee cup, rubber duck, beer can, and beer mug.

On 06/05/23, I observed a photo of direct care staff, Brittany Roger’s Crocs. The shoes are black and have a total of 18 charms. The charms Include the following: Micky Mouse, dice, shark, seashell, purple lava lamp, emerald circle gem, sea turtle, green candy bear, dog, cow print heart, mermaid tail, hang lose, diamond circle gem, blue bow, skeleton, girl skeleton, peace sign, silver spike ball, and a sea turtle.

On 06/06/23, I reviewed Resident B’s Resident Funds Part II form and associated receipts. On 05/11/23, Resident B spent \$131.17 at the Croc store. 26 charms and one pair of Croc shoes were purchased. 15 of the 26 charms on the receipt are in Resident B’s shoes. 11 of the 26 charms that are on the receipt are in Ms. Rogers shoes. The 11 charms on Ms. Rogers shoes Include the following: seashell, purple lava lamp, emerald circle gem, green candy bear, cow print heart, mermaid tail, hang lose, blue bow, girl skeleton, silver spike ball, and a sea turtle. 7 of the 18 charms that are on Ms. Rogers shoes were not on the receipt. These charms Include Micky Mouse, dice, shark, sea turtle, dog, diamond circle gem, skeleton, and a peace sign.

<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 A and Resident B were not protected from financial exploitation. Home manager, Brittany Rogers admitted that she used Resident A’s food stamp card after Resident A died to purchase groceries for the Kurtz home and for her personal use. Ms. Rogers was reprimanded by the Department of Health and Human Services (DHHS). She is in the process of repaying her debt in the amount of \$2,200.  Additionally, Ms. Rogers admitted that on 05/11/23, she used Resident B’s funds to purchase Resident B a pair of Croc shoes

	<p>and Croc charms. Per the receipt from the Croc store 26 charms were purchased. Resident B is in possession of 15 of the 26 charms. Assistant home manager, Crystal Lewis provided a photo of Croc shoes and stated that they belong to Ms. Rogers. Direct care staff Lashanda Marve corroborated this statement. The shoes belonging to Ms. Rogers had 11 of the 26 charms that were purchased from the Croc store on 05/11/23, by Resident B. Ms. Rogers denied that she took any of the charms that were purchased using Resident B's funds on 05/11/23.</p>
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**ALLEGATION:**

- **On 06/01/23, direct care staff, Denise Larowe failed to administer Resident C's 8:00 pm medications.**

**INVESTIGATION:**

On 06/05/23, I interviewed area manager, Michelle Bailey. Ms. Bailey stated Resident C's medications were not administered to him on 06/01/23, at 8:00 pm. The staff on shift, Denise Larowe was a fill in staff from a different home and she failed to administer all Resident C's medications to him during the 8:00 pm med pass. Resident C did not experience any symptoms or side effects as a result of not receiving his medication.

On 06/06/23, I completed an unannounced onsite investigation. I interviewed direct care staff Lashanda Marve, area manager Debbie Mcorris, Resident B, Resident C, Resident D, and Resident E. While onsite I reviewed Resident C's June 2023 Medication Administration Record (MAR) and the physical medications on hand.

On 06/06/23, I reviewed Resident C's June 2023 MAR and the physical medications in the home. Resident C's medications are packaged by the pharmacy in pouches that are labeled with the date and time of day. Resident C has two pouches of 8:00 pm medications. On 06/01/23, at 8:00 pm, the MAR was signed by direct care staff, Denise Larowe indicating that the following medications had been administered to Resident C (Melatonin 10mg, Olanzapine 2.5 mg, Phenytoin Sodium Extended 100 mg, Sudogest 30 mg, and Trazadone 100 mg.) However, I observed the physical medications in the sealed pharmacy container in the medication cabinet in the home.

On 06/06/23, I interviewed Resident B. Resident B was minimally verbal. Resident B was unable to answer questions related to this allegation. I observed Resident C and Resident D. Both residents are nonverbal and were therefore, unable to be interviewed for this investigation. During the time of the onsite investigation, Resident E was engaging in an individual planning meeting with his supports coordinator and was therefore, unable to be interviewed at that time.

On 06/06/23, I interviewed direct care staff Lashanda Marve. Ms. Marve stated that she is not trained to administer medication, Ms. Marve does not have access to any of the resident's medication or affiliated documentation and therefore has no information regarding this allegation.

On 06/06/23, I interviewed area manager Debbie Mccorris. Ms. Mccorris stated on 06/01/23, at 8:00 pm direct care staff, Denise Larowe did not administer all Resident C's 8:00 pm medications to him. Ms. Larowe is a fill in staff and was picking up a shift at the Kurts home. Resident C did not experience any symptoms or side effects as a result of not receiving his medications as prescribed.

On 06/12/23, I interviewed direct care staff Denise Larowe via telephone. Ms. Larowe stated she works full time at another home within the providers network, she picks up shifts at the Kurtz home. Ms. Larowe is trained to administer medications. 06/01/23, was the first time Ms. Larowe administered medications at the Kurtz home. Ms. Larowe explained Resident C's medications are packaged by the pharmacy in pouches that are labeled with the date and time of day. Resident C has two pouches of 8:00 pm medications. Ms. Larowe stated on 06/01/23, at 8:00 pm she administered all Resident C's medications to him. Ms. Larowe explained, she was unable to locate one of the two packages of 8:00 pm medications. Because she was unable to locate the package, she chose to administer Resident C the 8:00 pm medications dated, 06/02/23. Ms. Larowe stated that she later found the medications dated 06/01/23, it was stuck in the bottom of the box. Ms. Larowe reported to the area manager, Debbie Mccorris what happened. Ms. Larowe received a write up and was retrained by Ms. Mccorris on how to administer medications.

On 06/14/23, I called licensee designee Pam Hurley to conduct an exit conference. There was no answer. I left a detailed voicemail regarding my findings and informed her that a corrective action plan will be required.

<b>APPLICABLE RULE</b>	
<b>R 400.14312</b>	<b>Resident medications.</b>
	(2) Medication shall be given, taken, or applied pursuant to label instructions.
<b>ANALYSIS:</b>	Based on the information gathered through my investigation, there is sufficient information to conclude that Resident C's medications were not given pursuant to label instructions. Resident C's medications are packaged by the pharmacy in pouches that are labeled with the date and time of day. Resident C has two pouches of 8:00 pm medications. Resident C is prescribed Melatonin 10mg, Olanzapine 2.5 mg, Phenytoin Sodium Extended 100 mg, Sudogest 30 mg, and Trazadone 100 mg. On 06/01/23, direct care staff, Denise Larowe signed

	<p>the medication administration record indicating that these medications had been administered to Resident C at 8:00 pm. However, on 06/06/23, I observed the physical medications in the sealed pharmacy container in the medication cabinet at the Kurtz home. Ms. Larowe denied that she failed to administer the medications to Resident C. Ms. Larowe stated she was unable to locate the package of medications dated 06/01/23, as it was stuck in the bottom of the box. Therefore, she administered Resident C the medications labeled for the following day, 06/02/23, at 8:00 pm. Resident C is nonverbal and was unable to be interviewed for this investigation.</p>
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**III. RECOMMENDATION**

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



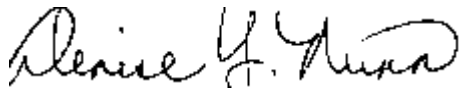
06/14/2023

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Johnna Cade  
Licensing Consultant

Date

Approved By:



06/22/2023

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Denise Y. Nunn  
Area Manager

Date