

GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS LANSING

MARLON I. BROWN, DPA DIRECTOR

May 21, 2025

Shelly Keinath
Beacon Specialized Living Services, Inc.
Suite 110
890 N. 10th St.
Kalamazoo, MI 49009

RE: License #: AS380399315 Investigation #: 2025A0007017

Beacon Home at County Farm

Dear Shelly Keinath:

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

- How compliance with each rule will be achieved.
- Who is directly responsible for implementing the corrective action for each violation.
- Specific time frames for each violation as to when the correction will be completed or implemented.
- How continuing compliance will be maintained once compliance is achieved.
- The signature of the responsible party and a date.

If you desire technical assistance in addressing these issues, please feel free to contact me. In any event, the corrective action plan is due within 15 days. Failure to submit an acceptable corrective action plan will result in disciplinary action.

Please review the enclosed documentation for accuracy and contact me with any questions. In the event that I am not available, and you need to speak to someone immediately, please contact the local office at (517) 284-9720.

Sincerely,

Mahtina Rubritius, Licensing Consultant Bureau of Community and Health Systems 611 W. Ottawa

P.O. Box 30664 Lansing, MI 48909 (517) 262-8604

Enclosure

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

I. IDENTIFYING INFORMATION

License #:	AS380399315
Investigation #:	2025A0007017
Complaint Bessint Date	03/26/2025
Complaint Receipt Date:	03/20/2025
Investigation Initiation Date:	03/27/2025
	99/21/2020
Report Due Date:	05/25/2025
Licensee Name:	Beacon Specialized Living Services, Inc.
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Licensee Address:	Suite 110 890 N. 10th St.
	Kalamazoo, MI 49009
	raiamazee, iiii 1888
Licensee Telephone #:	(269) 427-8400
Administrator:	Shelly Keinath
Licensee Designee:	Shelly Keinath
Name of Facility:	Beacon Home at County Farm
rame or racinty.	Beacon Floric at County Farm
Facility Address:	4380 County Farm Road
	Jackson, MÍ 49201
Facility Telephone #:	(269) 427-8400
Original Issuance Date:	08/20/2019
Original Issuance Date:	08/20/2019
License Status:	REGULAR
Effective Date:	02/20/2024
	201101000
Expiration Date:	02/19/2026
Canacity	6
Capacity:	U
Program Type:	DEVELOPMENTALLY DISABLED
	MENTALLY ILL

II. ALLEGATION(S)

Violation Established?

There have been several large ATM withdrawals from Resident A's account, and his ATM card is missing from the facility.	Yes
Additional Findings	Yes

III. METHODOLOGY

03/26/2025	Special Investigation Intake - 2025A0007017
03/27/2025	Special Investigation Initiated - On Site - Unannounced Face to face contact with Guadelupe Lopez, Home Manager, Resident A, other direct care staff, and four residents.
03/27/2025	Contact - Document Sent - Email to Ashlee Griffes, ORR Officer. Information requested.
03/27/2025	Contact - Document Received - Email from Ashlee Griffes, ORR Officer. Requested information received.
04/30/2025	Contact - Telephone call made to Shelly Keinath, Licensee Designee. Discussion.
05/14/2025	APS Referral made.
05/14/2025	Exit Conference conducted with Shelly Keinath, Licensee Designee.
05/14/2025	Contact – Telephone call to Ashlee Griffes, ORR Officer. Follow-up questions and discussion.
05/14/2025	Contact – Telephone to Shelly Keinath, Licensee Designee. Follow-up.

ALLEGATION: There have been several large ATM withdrawals from Resident A's account, and his ATM card is missing from the facility.

INVESTIGATION:

As a part of this investigation, I reviewed the Office of Recipient Rights (ORR) report, and they documented the following information:

On or about March 5, 2025, Case Manager #1 visited Resident A at the facility, and assisted him with going through his mail because he lost his glasses and could not see well. It was noted that there were several large random ATM withdrawals, which totaled over \$1000. Resident A reported being unaware of the withdrawals, and

there were no large items purchased to explain the amounts withdrawn. There was \$3.00 in Resident A's wallet.

ORR reviewed the bank statements for Resident A for the time periods of April of 2023 – March of 2025 and the following transactions were noted:

Date:	Transaction:	Amount:
04/2023	ATM Withdrawal Airport Road	\$253.50
05/2023	ATM Withdrawal Airport Road	\$303.50
06/2023	ATM Withdrawal Airport Road	\$304.00
07/2023	ATM Withdrawal Airport Road	\$353.50
08/2023	ATM Withdrawal Rives Junction	\$364.00
09/2023	ATM Withdrawal Michigan Ave	\$262.00
10/2023	ATM Withdrawal Spring Arbor Rd.	\$366.00
11/2023	ATM Withdrawal Airport Road	\$104.00
12/2023	Bank unable to print December	
	statement due to technical error	
01/2024	ATM Withdrawal North Street	\$202.00
02/2024	No ATM Withdrawals	\$0
03/2024	ATM Withdrawal Airport Road	\$303.50
04/2024	ATM Withdrawal Airport Road	\$303.50
05/2024	ATM Withdrawal Airport Road	\$303.50
06/2024	ATM Withdrawal Airport Road	\$302.00
07/2024	ATM Withdrawal Airport Road	\$203.50
08/2024	ATM Withdrawal County Farm Road	\$102.00
09/2024	ATM Withdrawal Airport Road	\$103.50
10/2024	ATM Withdrawal West Ave	\$100
11/2024	2 ATM Withdrawals (separate days)	\$406.00
12/2024	3 ATM Withdrawals (two separate	\$610.50
	days)	
01/2025	3 ATM Withdrawals (three separate	\$610.04
	days, different counties)	
02/07/2025	ATM Withdrawal Airport Road	\$203.60
02/10/2025	ATM Withdrawal Eaton Street	\$203.75
02/13/2025	ATM Withdrawal Eaton Street	\$604.00
02/14/2025	ATM Withdrawal W. Michigan Ave	\$406.00
02/14/2025	ATM Withdrawal Eaton Street	\$203.75

03/06/2025	Deposit Receipt	\$1000
03/10/2025	Deposit Receipt	\$600

On March 27, 2025, I conducted an unannounced on-site investigation and made face to face contact with Guadelupe Lopez, Home Manager, Resident A, other direct care staff, and four residents.

I interviewed Guadelupe Lopez, who informed me that she had been a home manager since September of 2024. She further reported that although Resident A was his own guardian and payee, "I've been taking out money for [Resident A] when he needs it." When asked how much was taken out of the ATM, Guadelupe Lopez informed me that it would depend on what he needed. She recalled that sometime in November, Resident A needed new clothes. Guadelupe Lopez stated money was taken out of the ATM and given to Resident A with the intent of purchasing clothes. According to Guadelupe Lopez, she and other direct care staff members had not been documenting these transactions anywhere because the money went from the ATM directly to Resident A.

Guadelupe Lopez initially stated \$100.00 was the largest amount of money kept on hand in the home for Resident A but later admitted to the home holding two separate envelopes of money for Resident, one with \$1000 and the other with \$600. According to Guadelupe, this was because she believed if Resident A had too much money in his personal bank account, it would jeopardize his Social Security Income.

Guadelupe Lopez stated Resident A's money was kept at the facility and that she never took the money home. She was not sure of the largest amount of money she had ever withdrawn from Resident A's account, and she did not keep the ATM receipts. According to Guadelupe Lopez, Resident A was not always with her when she withdrew money from his account, and he did not always know when she was taking money out for him. Guadelupe Lopez stated that she was thinking about buying something for Resident A, but she wasn't sure what he needed, maybe a dresser. According to Guadelupe Lopez, regarding the withdrawals in January of 2025, she just took out what she could, nothing specific. Guadelupe Lopez informed me that all the money had been returned to Resident A.

I interviewed Resident A, who informed me that he had resided in the home for about three years, and confirmed he was his own guardian and payee. Resident A informed me that every once in a while, he would go to the ATM with a staff member. Resident A stated he liked to get money for the weekend, as they went out to eat or went through a drive through for food. Resident A informed me that staff used to pull money out of the ATM for him. However, he did not know why. According to Resident A, \$40.00 was the largest amount of money he had taken out of an ATM but usually they only took out \$20.00. I inquired if he had ever taken out \$300 and he stated, "That would be an exception to the rule, as it's usually only \$20.00 at a time." Resident A reported that he had currently had \$700.00 in the bank, however he did not have bank statements to confirm this. Resident A stated he did not have any concerns regarding individuals in the home taking money from his wallet. He then replied, "But maybe someone is taking money from my bank account." Resident A also wondered if his identity had been stolen.

While at the facility, I reviewed Resident A's file. It was noted on the *Resident Funds Part I* form that the person responsible for Resident A's funds was Resident A, as the Legal Guardian and Representative Payee, Beacon Specialized Living, as the AFC

Licensee Designee, and Guadelupe Lopez. It was documented on the form (box unchecked) that Beacon Specialized Living did not agree to manage Resident A's cash.

On the Assessment Plan for AFC Residents, it was noted that Resident A did not manage his money as he had a payee; however, that information was crossed off with an error note, documenting that he was responsible for his own money. Copies of the documents, as relevant, were obtained for the facility file.

In relevant part, the following additional information was noted in the ORR Investigation: On March 5, 2025, ORR conducted a telephone interview with Shelly Keinath, Licensee Designee, who reported that after Case Manager #1 left, Guadelupe Lopez called. Guadelupe Lopez "stated that she believed that [Resident A] could not have more than \$1000 in his bank account, or his Social Security would be reduced. [Guadelupe] Lopez reported that she had the money in an envelope with her." Shelly Keinath reported to ORR that on March 3, 2025, Guadelupe Lopez had been sent home with the flu and would be returning on March 6, 2025. Guadelupe Lopez told Shelly Keinath that she was going to help Resident A get a new dresser and other items that he needed. Guadelupe Lopez was informed that staff never manage residents' money or hold on to their money. Shelly Keinath reported to ORR that Guadelupe Lopez would bring in the money to be deposited into Resident A's account and a deposit receipt would be provided.

ORR noted that there was a discrepancy between the amount deposited and the total of ATM withdrawals documented on the bank statements. Shelly Keinath reported that she asked for all the receipts from Guadelupe Lopez. In addition, Guadelupe Lopez reported that she would replace the remaining amount.

During the interview with ORR, Guadelupe Lopez reported that the previous home manager had been withdrawing cash for Resident A. Only the home manager had access to the resident funds and Resident A's ATM card. Prior to storing Resident A's ATM card with the funds, Resident A had been ordering off television, causing his account to be overdrawn. Resident A agreed to have the card and funds locked up, so he was not able to order items impulsively. Guadelupe Lopez reported to ORR that when she took over as home manager in September of 2024, she continued to withdraw funds for Resident A. Guadelupe Lopez would give Resident A the funds as needed. Guadelupe Lopez informed ORR that Resident A often had to replace his reading glasses, and he liked to go out to eat and to go shopping. At one-point, Resident A's roommate was stealing money from Resident A's wallet. Guadelupe Lopez reported that Resident A had been saving for a dresser, and she was helping him save by holding on to his cash for him.

It was also documented in the ORR report that when Shelly Keinath asked Guadelupe Lopez to replace the money she brought in the money (\$1000) he had saved. Guadelupe Lopez reported to feel responsible for the rest of the missing funds and replaced the \$600 that had been brought to Shelly Keinath's attention.

Guadelupe Lopez reported to ORR that she had accidentally held Resident A's ATM card and put it back in the resident funds drawer as soon as she returned from her illness.

On April 30, 2025, I spoke with Shelly Keinath, who stated that they contacted Blackman Township Police Department, but they would not take a report because Resident A wasn't saying that anyone was stealing from him. The police also wanted to speak with Ashlee Griffes with ORR. Shelly Keinath stated that she explained to Guadelupe Lopez that when residents are their own guardian, staff do not touch their money, even if requested by the resident. She stated that staff were not to touch their bank cards or know their pin numbers. Guadelupe Lopez reported to her that if SSI completed an audit there would be an issue if he had over a certain amount in his account. Shelly Keinath informed Guadelupe Lopez that they didn't do that. Shelly Keinath informed me that she retrained Guadelupe Lopez on the facility's rules and policies. She also told staff that if Resident A tried to give them cash to purchase things from the store, to encourage him to go to the store. I requested that she send me a copy of the Resident Funds Part II forms for Resident A's cash. beginning in January of 2025. Shelly Keinath also informed me that ORR substantiated the allegations, and that she submitted a written corrective action plan addressing the allegations.

A review of the *Resident Funds Part II* forms reflected that staff accepted \$100 on January 1, 2025, for Resident A. There were several transactions and Resident A signed when the money was disbursed.

It was also noted in the ORR investigation that on April 4, 2025, ORR spoke with an officer from Blackman Township Police Department, and it was noted that there is an investigation, in the beginning stages, and the incident number is #4138-25. The ORR complaint was supported by a preponderance of the evidence for a violation of 72225 – Abuse Class II – Exploitation.

On May 14, 2025, I conducted an exit conference with Shelly Keinath, Licensee Designee. We discussed the investigation, the findings, and my recommendations. We also discussed the *Resident Funds Part II* forms, and it was noted that the money documented on the form did not match the ATM withdrawals. Shelly Keinath explained that Resident A would ask staff to get a certain amount of money out of the ATM, and sometimes he would keep a portion of the money and hand the remaining amount back to the staff for safekeeping. The money on the form was when Resident A handed the cash to staff and asked them to safeguard the money. Shelly Keinath stated that staff handled Resident A's funds incorrectly and Guadelupe Lopez received a Progressive Action and was retrained. According to Shelly Keinath, all staff were retrained that when a resident is not legally guarded staff do not handle their money. Shelly Keinath stated that Resident A has a locker with a lock for his wallet and valuables. She concurred with the findings and agreed to submit a written corrective action plan to address the established violations.

APPLICABLE RULE	
R 400.14305	Resident protection.
	(1) A resident shall be assured privacy and protection from moral, social, and financial exploitation.
ANALYSIS:	Based upon my investigation, which consisted of an onsite investigation, interviews and discussions with facility staff members and Resident A, as well as a review of the Office of Recipient Rights report, it is concluded that staff member Guadelupe Lopez had Resident A's ATM card in her possession and made multiple withdrawals from his account without his knowledge or consent. It has also been established Guadelupe Lopez took Resident A's ATM card with her out of the home from March 3, 2025, to March 6, 2025. Subsequently, it has been established that Resident A was not assured protection from financial exploitation when it was discovered there were several large ATM withdrawals from his account, and his ATM card was missing from the facility.
CONCLUSION:	VIOLATION ESTABLISHED

ADDITIONAL FINDINGS:

INVESTIGATION:

During my interview with Guadelupe Lopez, she initially stated \$100.00 was the largest amount of money kept on hand in the home for Resident A but later admitted to the home holding two separate envelopes, one with \$1000, and the other with \$600.00, for Resident A. Guadelupe Lopez stated Resident A's money was kept at the facility and that she never took the money home.

On May 14, 2025, I conducted the exit conference with Shelly Keinath, Licensee Designee. She concurred with the findings and agreed to submit a written corrective action plan.

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.

CONCLUSION:	VIOLATION ESTABLISHED
ANALYSIS:	Based on the information gathered during this investigation and provided above, it's concluded that the licensee accepted more than \$200.00 for safekeeping for Resident A.

IV. RECOMMENDATION

Contingent upon receipt of an acceptable written corrective action plan, it's recommended that the status of the license remains unchanged.

Mahtina Rubertius	
	05/14/2025
Mahtina Rubritius Licensing Consultant	Date
Approved By:	
michele Struter	5/21/2025
Michele Streeter Section Manager	Date