



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
LANSING

ORLENE HAWKS  
DIRECTOR

June 29, 2022

Rachel Sykes  
Lutheran Adoption Service  
1545 Keystone  
Lansing, MI 48911

RE: License #: CB330361250  
Investigation #: 2022C0112015  
Lutheran Adoption Service

Dear Ms. Sykes:

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.

Please note that violations of any licensing rules are also violations of the MISEP and your contract.

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 area manager, Jessica VandenHeuvel at (616)204-6992.

Sincerely,

A handwritten signature in cursive script that reads "Holly K. Austin".

Holly Austin, Licensing Consultant  
MDHHS\Division of Child Welfare Licensing  
Suite 200  
121 Franklin Street SE  
Grand Rapids, MI 49507  
(269) 330-7082

enclosure

**MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES  
DIVISION OF CHILD WELFARE LICENSING  
SPECIAL INVESTIGATION REPORT**

**I. IDENTIFYING INFORMATION**

<b>License #:</b>	CB330361250
<b>Investigation #:</b>	2022C0112015
<b>Complaint Receipt Date:</b>	05/20/2022
<b>Investigation Initiation Date:</b>	05/20/2022
<b>Report Due Date:</b>	07/19/2022
<b>Licensee Name:</b>	Wellspring Lutheran Services
<b>Licensee Address:</b>	6019 West Side Saginaw Bay City, MI 49707
<b>Licensee Telephone #:</b>	Unknown
<b>Administrator:</b>	Rachel Sykes, Administrator
<b>Licensee Designee:</b>	Rachel Sykes, Designee
<b>Name of Facility:</b>	Lutheran Adoption Service
<b>Facility Address:</b>	1545 Keystone Lansing, MI 48911
<b>Facility Telephone #:</b>	(248) 663-0670
<b>Original Issuance Date:</b>	08/13/2014
<b>License Status:</b>	REGULAR
<b>Effective Date:</b>	12/10/2020
<b>Expiration Date:</b>	12/09/2022
<b>Capacity:</b>	Unknown
<b>Program Type:</b>	CHILD PLACING AGENCY, PRIVATE

## II. ALLEGATION(S)

	Violation Established?
Facility has not submitted records to MDHHS for permanent retention one year following the final order of adoption as required.	Yes

## III. METHODOLOGY

05/20/2022	Special Investigation Intake 2022C0112015
05/20/2022	Contact - Document Sent Email sent to complainant to clarify which office the complaint is against
05/20/2022	Special Investigation Initiated - Letter Email to complainant
05/27/2022	Contact - Document Received Email from complainant stating that she is unsure of which office/license the complaint is against
05/27/2022	Contact - Document Sent Email sent to agency staff to clarify which license the alleged files in violation belong to
06/01/2022	Contact - Document Received Email from agency staff stating that the files in questions belong to multiple office sites
06/02/2022	Inspection Completed On-site Reviewed closed adoption file storage and conducted interview
06/10/2022	Contact - Document Received Case information received from Program Manager
06/14/2022	Contact - Face to Face Interviews and Pre-Exit with Chief Administrator and Program Managers
06/14/2022	Inspection Completed-BCAL Sub. Compliance

### ALLEGATION:

Facility has not submitted records to MDHHS for permanent retention one year following the final order of adoption as required.

### INVESTIGATION:

On 5/20/2022 I was assigned to investigate allegations submitted by Complainant through the DCWL on-line compliant form. Complainant stated that 53 closed adoption files were identified for which the licensee has not submitted the finalized adoption files to MDHHS for permanent retention one year following the finalization order.

On 5/24/2022 I requested a list of the 53 case names from the complainant, which I received through email the same day. Additionally, I asked the complainant to verify if all 53 files were associated with the LAS-Lansing license, to which she responded that she did not know to which license each file was attached; therefore, all 53 files are addressed within this report.

## **INTERVIEWS**

On 6/2/2022 I conducted an on-site visit, viewed the storage of closed adoption files and interviewed Supervisor A.

Supervisor A reported each satellite office maintains their own closed adoption files and they are currently working on establishing a uniform method of documenting and disseminating closed adoption files as the method they were previously using was not effective. Supervisor A reported there were plans to bring several files to local offices prior to the statewide stay-at-home order in 2020 and now that they are back in the office, they are working to get the files to the local offices as required. She reported she is in the process of boxing up all closed adoption files and labelling each box with the year and month of the finalization as well as the month and year the files must be sent/brought to the applicable local office. She showed me the boxes which were labelled as indicated. She stated that, as she boxes up the files, she is making note of any files that are overdue for transport to local offices and I will be provided with that list once she is completed.

On 6/24/22 I held a virtual meeting with Chief Administrator, Program Manager 1, and Program Manager 2.

Chief Administrator 1 reported Lutheran Adoption Services is currently undergoing an effort statewide to develop a uniform procedure for tracking and distributing finalized adoption files in order to achieve and maintain compliance in each office. Chief Administrator 1 reported compliance has been a challenge due to Lutheran Adoption Services having offices throughout the state of Michigan and the tight timeframe of bringing files to local offices between the 12-13<sup>th</sup> month following finalization can present challenges if the office who provided the adoption service is located several hours from the county DHHS where the file must be brought.

Program Manager 1, who works under the LAS-Lansing license, reported that she compiled information about the 53 cases named by the complainant. She stated that some of the files were not located in the agency database, so it is believed these were identified as being Lutheran Adoption Services cases in error. Program Manager 1 stated she was able to identify to which office each of the applicable files belonged and where those files were in the process of being returned to the local offices. Program Manager 1 reported that the staff member who was responsible for the tracking of finalized adoption files went on leave after which she passed away. Since that time, they have continued to struggle with low staffing. Additionally, some county local offices have not always been receptive to receiving the finalized

adoption files as they have reported either not having the staff or space to take the files.

## **DOCUMENT REVIEW**

On 6/10/2022 I received and reviewed a spreadsheet from Program Manager 1 identifying the following information about each of the 53 cases named in the complaint:

1. Youth A – Finalized 10/7/2020, Delivered 4/22/22
2. Youth B – Troy License
3. Youth C – Finalized 10/1/2020, Delivered 4/22/22
4. Youth D – Not located in the LAS database
5. Youth E – Troy License
6. Youth F – Troy License
7. Youth G – Finalized 10/7/2020, Delivered 7/27/2021
8. Youth H – Finalized 10/12/2020, Delivered 4/22/22
9. Youth I – Finalized 10/13/2020, Delivered 5/17/2022
10. Youth J – Finalized 10/13/2020, Delivered 6/1/2022
11. Youth K – Finalized 10/16/2020, Delivered 7/30/2021
12. Youth L – Troy License
13. Youth M – Troy License
14. Youth N – Finalized 10/21/2020, Delivered 6/1/2022
15. Youth O – Finalized 10/21/2020, Delivered 6/1/2022
16. Youth P – Finalized 10/21/2020, Delivered 6/1/2022
17. Youth Q – Troy License
18. Youth R – Troy License
19. Youth S – Troy License
20. Youth T – Finalized 10/26/2020, Delivered 5/26/2022
21. Youth U – Troy License
22. Youth V – Finalized 10/27/2020, Delivered 4/22/2022
23. Youth W – Finalized 10/27/2020, Delivered 6/3/2022
24. Youth X – Finalized 10/27/2020, Delivered 6/3/2022
25. Youth Y – Finalized 10/28/2020, Delivered 4/22/22
26. Youth Z – Finalized 10/28/2020, Delivered 8/3/2021
27. Youth AA – Troy License
28. Youth BB – Troy License
29. Youth CC – Troy License
30. Youth DD – Troy License
31. Youth EE – Troy License
32. Youth FF – Troy License
33. Youth GG – Finalized 11/2/2020, Delivered 5/26/2022
34. Youth HH – Finalized 11/3/2020, Delivered 6/3/2022
35. Youth II – Troy License

- 36. Youth JJ – Troy License
- 37. Youth KK – Finalized 11/6/2020, Delivered 8/3/2021
- 38. Youth LL – Finalized 11/6/2020, Delivered 6/1/2021
- 39. Youth MM – Finalized 11/9/2020
- 40. Youth NN - Finalized 11/9/2020
- 41. Youth OO – Troy License
- 42. Youth PP – Troy License
- 43. Youth QQ – Troy License
- 44. Youth RR – Troy License
- 45. Youth SS – Finalized 11/9/2020, Delivered 4/22/2022
- 46. Youth TT – Duplicate entry, Same Youth as Youth SS
- 47. Youth UU- Finalized 11/12/2020
- 48. Youth VV – Troy License
- 49. Youth WW – Finalized 11/20/2020, Delivered 5/26/2022
- 50. Youth XX – Troy License
- 51. Youth YY – Troy License
- 52. Youth ZZ – Finalized 11/23/2020, Delivered 5/26/2022
- 53. Youth AAA – Not located in LAS database

Of the 53 cases named by the complainant, 24 were case managed under the LAS-Troy license, 2 were not located within the LAS database, and 27 were case managed under the LAS-Lansing License. Of those 27, 22 were not delivered to the applicable local office within the required timeframe.

On 6/21/2022 I completed a review of the files of Youth's D and AAA in MiSACWIS and determined that neither case was managed by either of the Lutheran Adoption Services licenses.

<b>APPLICABLE RULE</b>	
<b>ADM 1030</b>	<b>Disposition of Records for MDHHS Supervised Children</b>
	For both MDHHS and contracted adoption agency cases, the local MDHHS office or contracted agency must retain all adoption case records for one year after finalization of the adoption. One year (between 12-13 months) past the adoption finalization date, a contracted adoption agency must send the original record to the local MDHHS office; copies must not be maintained by the contracted adoption agency; see licensing rule R400.12713-Adoption Placement Record.
<b>ANALYSIS:</b>	The licensee is in violation as 22 files were not sent to the local MDHHS office between 12-13 months of finalization.
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

#### IV. RECOMMENDATION

Upon receipt of an acceptable CAP, I recommend no change in the license status.



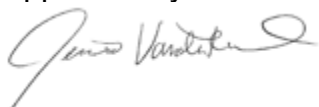
June 27, 2022

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Holly Austin  
Licensing Consultant

Date

Approved By:



June 29, 2022

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Jessica VandenHeuvel  
Area Manager

Date