



Adult Protective Services and Financial Exploitation Prevention Act

MCL 487.2081 et seq

What is meant by Covered Financial Exploitation of a Vulnerable Adult?

- ▶ **"Covered financial exploitation"** means financial exploitation of an individual through deception, manipulation, coercion, intimidation, or improper leveraging of a caregiver relationship.
- ▶ Definitions taken from FEPA Statute 487.2081-2091 / Public Act 344

Vulnerable Adult Definition

Means a condition in which an adult is unable to protect himself or herself from abuse, neglect, or exploitation because of a mental or physical impairment or because of advanced age

The Social Welfare Act
400.11a

Also known as the APS
Statute

Bank and Credit Union Responsibilities

Call Centralized Intake at 855-444-3911 and make an adult protective services (APS) complaint or call Law Enforcement

Create a training program for employees Mandated to report suspected or detected covered financial exploitation

Freeze assets if warranted in reported cases of covered financial exploitation

Communicate with and assist APS and law enforcement in investigations of reported covered financial exploitation

Centralized Intake (CI) Responsibilities



RECEIVE AND DOCUMENT
ALLEGATIONS OF SUSPECTED
COVERED FINANCIAL EXPLOITATION
OBTAIN EMAIL ADDRESS FOR ALL
MANDATORY REPORTERS

OBTAIN EMAIL ADDRESS AND
CONTACT PERSON TO FORWARD TO
APS WORKER

SEND AN EMAIL UPON DENIAL
DECISION INDICATING THE
ALLEGATION WAS DENIED FOR
INVESTIGATION REFERENCING THE
LOG ID #

New or Updated Adult Protective Services (APS) Responsibilities

Investigate allegations of
Covered Financial Exploitation

APS Supervisor will email
financial institution upon
receipt indicating the referral
has been assigned for
investigation referencing the
Log ID # and assigned APS
worker

APS worker will Contact the
financial institution with an
update as soon as is
practicable during the
investigation

Adult Protective Services(APS) Responsibilities Continued

Provide written notice to the county Prosecutor's office Within ten business days of an assigned covered financial exploitation investigation reported by a bank or credit union

APS worker may contact bank or credit union to inquire about any account holds, request evidentiary financial records, ask personnel about interactions with the client

APS will contact the bank or credit union at the end of the investigation to provide the outcome-whether covered financial Exploitation occurred or not

What will CI ask me about the Client?

Basic demographic information including Native American Heritage and Veteran status

Specifics about finances and what the concerns are: unusual purchases or withdrawals, evidence of fraud, new person accompanying client to do banking, anything out of the ordinary

Specifics about how the client is behaving at the bank or credit union: do they seem distracted or forgetful, pressured by person they are with or the individual speaks for them, fearful, secretive, is their appearance different than normal

Why does Centralized Intake and APS need this information?

CI needs as much demographic information to properly identify the client

CI needs your firsthand observation of the client to determine if the client is a Vulnerable Adult and whether to assign or deny the referral

CI asks Native American Heritage as APS does not have jurisdiction over tribal members on reservation or trust land

CI asks veteran status as there are some extra resources available to assist a veteran if the case is assigned

APS needs as much information as possible about the financial concerns, including records, to fully investigate the allegations and to coordinate with law enforcement if warranted

APS needs the visual observations of those who directly interact with the client to determine client can make informed decisions

APS needs information about positive supports in the client's life to connect with

Questions?





Kris Lamblin
APS Policy Specialist
Supportive Adult Services Section
lamblink@michigan.gov

Cynthia Farrell
State Administrative Manager
Supportive Adult Services Section
farrellc2@michigan.gov