STATE OF MICHIGAN
DEPARTMENT OF
LIFELONG EDUCATION, ADVANCEMENT, AND POTENTIAL
LANSING

GRETCHEN WHITMER
GOVERNOR

BEVERLY WALKER-GRIFFEA
DIRECTOR

Barry Walters
Camp Trotter for Children
5566 86th St
Newaygo, MI 49337

October 31, 2024

RE: License #: CR620200860
Investigation #: 2024C0434017
Camp Trotter for Children

Dear Mr. Walters:

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 Grand Rapids licensing unit at 616-356-0100.

Sincerely,

James VandenHeuvel

James P. VandenHeuvel, Lead Licensing Consultant
Camp Licensing Unit
350 Ottawa, N.W. Unit #13, 7th Floor
Grand Rapids, MI 49503
(616) 901-3730
enclosure

MICHIGAN DEPARTMENT OF
LIFELONG EDUCATION, ADVANCEMENT, AND POTENTIAL
CAMP LICENSING UNIT
SPECIAL INVESTIGATION REPORT

I. IDENTIFYING INFORMATION

License #:	CR620200860
Investigation #:	2024C0434017
Complaint Receipt Date:	07/16/2024
Investigation Initiation Date:	07/22/2024
Report Due Date:	09/14/2024
Licensee Name:	VFW Department of Michigan
Licensee Address:	924 N Washington Ave Lansing, MI 48906
Licensee Telephone #:	(517) 485-9456
Administrator:	Vacant
Name of Facility:	Camp Trotter for Children
Facility Address:	5566 86th St Newaygo, MI 49337
Facility Telephone #:	(231) 652-7241
Original Issuance Date:	06/01/1943
License Status:	REGULAR
Effective Date:	08/19/2023
Expiration Date:	08/18/2025
Capacity:	88
Program Type:	CHILD CAMP - RESIDENTIAL

II. ALLEGATION(S)

	Violation Established?
The camp staff did not provide adequate supervision of campers.	**Yes**
Additional Findings	**Yes**

III. METHODOLOGY

07/16/2024	Special Investigation Intake 2024C0434017
07/22/2024	Special Investigation Initiated - On Site
07/29/2024	Contact - Document Received
07/29/2024	Contact - Document Received
07/31/2024	Contact - Telephone call made
08/01/2024	Contact-Face to Face
10/23/2024	Contact-Face to Face
10/23/2024	Inspection Complete- Sub Compliance
10/23/2024	Exit Conference with Barry Walters
10/23/2024	Corrective Action Plan requested and due by 11/18/2024

ALLEGATION:

The camp staff did not provide adequate supervision of campers.

INVESTIGATION:

Intakes Received

On 7/16/24, the department received an intake transferred from Michigan Department of Health and Human Services (MDHHS) Centralized Intake (CI). The intake was screened out by CI for assignment and sent to licensing for review. The intake alleged camper self-harm cutting during cabin free time. The camp reported the incident to CI.

On 7/29/24, the department received a second intake transferred from MDHHS CI. The intake alleged Camper B and other campers were left alone during the week of July 7-July 13 (week #1) in the cabin where the campers were playing doctor and allegedly touched each other's private areas. The intake was also transferred to law enforcement and the MDHHS Placement in Care Unit (PCU) for review. The intake #201834 was combined with the current investigation.

The department received a third report transferred from MDHHS CI alleging two campers touching themselves and peers inappropriately during the talent show on week #3. This intake was reported by camp administration. This report was combined with this current investigation.

Incident Investigations

Incident #1: Self-harm by Camper A

On 7/22/24, licensing consultant Wendy Borden conducted an initial onsite inspection on the allegation of self-harm incident with Camper A. Ms. Borden interviewed camp director Orville Beauchamp. Mr. Beauchamp stated the Camper A was found to be cutting herself with a shaving razor during cabin time on 7/11, while getting ready for swim-time. He provided a copy of the incident report for review. Mr. Beauchamp stated he contacted Camper A's parent on the day of the incident to alert her. He reported that Camper A was picked up from camp at normal check out 7/13. Mr. Beauchamp stated Camper A was never left alone by the staff and after the incident, staff were hypervigilant to ensure Camper A did not continue to self-harm. Mr. Beauchamp stated there were two assigned cabin counselors with 10 campers for cabin #5. However, there were no written staffing plan identifying the cabin counselors in the cabin.

Ms. Borden interviewed camp counselor, Staff Member 1 (SM1) at the camp. SM1 stated Staff Member 2 (SM2) was in the cabin while SM1 had left the cabin momentarily. SM1 stated upon returning to the cabin campers notified her that Camper A was bleeding. SM1 assessed Camper A and saw she had made cuts on her thigh and calves. SM1 stated Camper A appeared to be shaving with a facial razor and SM1 had provided instruction on how to shave legs properly and use the correct type of razor. SM1 stated she provided first aid care to the cuts and described the cut as a "light cut on the top of the skin." SM1 stated it appeared to be a shaving accident and didn't require additional first aid from the health officer. SM1 stated later at the waterfront, Camper A had taken the bandages off and SM1 noticed the cuts were odd for a shaving type of cut. SM1 reported the concern to the assistant director, Staff Member 3 (SM3). SM1 stated that SM3 reported the concerns to Mr. Beauchamp saying, "we have a possible cutter." SM1 stated SM3 then went to the cabin and removed the razors from the cabin area.

Ms. Borden observed the cabin #5. The cabin inspection revealed a compartmentalized cabin with two bunkrooms with a counselor area in the middle.

The counselor section is nestled in an adjacent room within ear shot to the camper sleeping area. The two bunkrooms were connected by a short hallway with counselor sleeping room connected.

Ms. Borden interviewed health officer, SM3 at the camp. SM3 stated she learned of the cutting incident later on in the evening and took SM1 to the health center to assess the injury. SM3 stated she observed what amounted to “similar to nicks, scrapes you might get when you are running around in the woods. They were not long or deep cuts.” SM3 stated there were no reported behavior concerns identified in the camper registration form as evidenced by the parent marking “no” for the question about behavior issues. SM3 also stated there were no mental health issues on the camper registration materials nor mentioned during the check-in process.

Ms. Borden reviewed Camper A’s health form. The health form had no record of behavioral or mental health concern.

I reviewed the cabin #5 roster titled “Camper Information by Cabin.” The roster identified 10 campers for the cabin. The cabin list did not identify the supervising counselors for the cabin. The camp could not provide a written staffing plan that identified who the assigned cabin counselors are for the different cabin groupings.

Incident #2 “Simulated Doctor”

On 8/1/24, I interviewed Mr. Beauchamp along with Ms. Borden at the camp about the behavior incidents and concerns with supervision of campers reported to the department about complaint intake #20183.

Mr. Beauchamp stated on 7/19, the camp received a call from Camper B’s parent stating there was “inappropriate activities going on in his daughter’s cabin” during session #1 as reported by his daughter. Mr. Beauchamp stated the term “hospital” was used and the camper had informed the group to stop, or she would tell. The other campers said that if she did tell someone she would be beat up. Mr. Beauchamp stated he filled out an incident report.

I reviewed an incident report provided by Mr. Beauchamp. The incident report narrative corroborated Mr. Beauchamp’s interview statements. Mr. Beauchamp stated there were some behavior issues identified in the cabin #5 during week #1. I reviewed a document titled “*VFW Camp Trotter for Children Behavior Incident Reporting Form.*” The document included camper name, date, time, staff name, behavior of participant, action taking, what activity was occurring when the behavioral incident happened, what happened, and camp director signature with date. The behavior incident form identified Camper B had been involved in repeatedly not following instructions and disrespectful behavior. The action taken was discussion with Camper B, verbal redirection, and non-verbal/verbal warning. The behavior occurred during bathroom breaks, mess hall, color group activities, and cabin. The report included the staff had to separate Camper B from Camper C

because they would not listen and talking over staff. The report included a brief narrative reading “Camper B left the cabin without anyone knowing, she went with 2 girls that went to the bathroom. Another counselor had to check on them. [She] kept talking back when I was trying to give directions. [She] continued to talk when staff were talking. [I] kept having to tell her to sit on her butt at tables.” The report included a note that said “Camper C” was sent home due to violations of camper behavior bullying. Mr. Beauchamp did not have any other information about the “hospital” activity within the cabin. He stated SM1 and SM2 were the cabin counselors. Mr. Beauchamp stated SM2 had left after the first week of camp and was no longer a staff member.

I attempted to contact SM2 by telephone. SM2’s legal guardian (LG1) stated SM2 was a cabin leader at Camp Trotter during week #1. She stated SM2 determined to leave camp after session #1 because the camp leadership “did not talk kindly to her.” LG1 stated SM2 has a “developmental disability and cognitive impairment.” It was her first time at camp. LG1 stated it was communicated to the camp director during the phone interview that she would need support as a cabin leader. LG1 stated the camp director stated it would be fine and they would assist her. She stated there were no other interviews beyond the phone call. LG1 stated she thought SM2 could supervise children because she does appropriately with her own children. LG1 stated SM2 was provided a staff manual and attended staff training for cabin leaders. She stated the training occurred during the last week of June and the first week of July.

On 10/16/24, I reviewed the Newaygo County Sheriff’s Department for the police report of the alleged incident occurring between campers. The police report # NCP2401841 included interviews, law enforcement actions, and case status disposition. The report read in part that Camper B’s parent “canceled the CAC due to not wanting to re-traumatize his daughter Camper B since she was not a victim of anything inappropriate.” The status of the case was “closed.”

Incident #3: “Inappropriate Touching

The department received a third report sent from Centralized Intake and assigned it within Intake #201832 and combined with this investigation. The complaint identified Camper D and Camper E were observed touching themselves inappropriately and tried to touch their peers inappropriately. The complaint was transferred to licensing for review.

I interviewed Mr. Beauchamp about the alleged incident with Camper D and Camper E. Mr. Beauchamp stated he reported the allegation to Centralized Intake on 7/25/24, according to his responsibilities under being a mandated reporter and child protection plan. Mr. Beauchamp stated the touching incident occurred during an all-camp talent show on 7/24. He stated the boys were observed by other campers touching each other. Mr. Beauchamp stated the behaviors were corrected and he reported to the camper parent(s) and contacted Centralized Intake. Mr. Beauchamp

stated campers, and staff, were all congregated within the pavilion for the talent show. Staff are required to be present and supervising the campers. He stated usually the staff sit around the campers in the pavilion during these types of all camp activities.

I reviewed the incident report provided by Mr. Beauchamp. The incident report supported Mr. Beauchamp's statements.

I toured the camp facility. I observed the pavilion area where the talent show took place. The large pavilion includes picnic tables and cement floor. I observed campers in the field playing games with staff members. The ratios were at least one adult to 10 campers.

Policy Review

I reviewed the policy manual. The policy manual included the behavior management policy, child protection policy, and staffing ratios. The staffing ratio plan was listed within the "Child Protection Policy for Camp Trotter," on page 15. The policy read "The campers become our responsibility when they enter Camp Trotter. In order to ensure their safety, we must be alert at all times and know what danger signs to watch for." The Staff-to-Camper ratio is outlined within this policy and lists for children below the age of 13, during their awake hours, there shall be one adult staff member for every 10 campers. For campers below the age of 13, during their sleeping hours, there shall be 1 adult staff member for every 14 campers. The supervision policy goes on to read "*Know where your campers are at all times. Do not allow campers to wander off alone*." The policy also reads "*Every staff member will be required to sign a copy of the above policies attesting that they have read and understand this policy. A copy of the signed statement will be retained as part of the counselor's employment folder*."

APPLICABLE RULE	
R 400.11111	**Number of staff.**
	(1) A camp shall develop and follow a written staffing ratio plan for the camper population served. A camp shall ensure that the ratio is not less than as specified in subrule (2) of this rule.
FOR REFERENCE	**(2) A camp shall ensure that the ratio of adult staff members to campers at any one time is as follows:** **(a) For campers below the age of 13, during their awake hours there shall be 1 adult staff member for every 10 campers or a fraction thereof beyond the first 10.**

	(b) For campers below the age of 13, during their sleeping hours there shall be 1 adult staff member for every 14 campers or a fraction thereof beyond the first 14. **(c) For campers 13 years of age or older, there shall be 1 adult staff member for every 14 campers or a fraction thereof beyond the first 14.**
ANALYSIS:	Interviews, records, and observations reveal the camp does not have a written staffing plan detailing assigned staff scheduling ensuring ratios are maintained. The policy provides generic language and is not specific to the various staffing assignments and with ratios at the camp especially at times such as transitions, programming, and free time. The camp did not comply with this rule.
CONCLUSION:	**VIOLATION ESTABLISHED**

ADDITIONAL FINDINGS

Mr. Beauchamp stated he was told by the VFW that he was the “camp director” in residence but would not be allowed to function as the camp director in practice. He stated there was a personnel matter in which the assistant camp director had filed a complaint with his supervisor, Kimberly Napolean. Mr. Beauchamp stated he could not leave the director’s cabin but had to remain onsite to be incompliance with the state of Michigan because he was listed on the license. Mr. Beauchamp stated the assistant director, Hope Justin, was made the acting director by Ms. Napolean.

Ms. Justin stated she was made acting director on 7/31 because of an interpersonal conflict at the camp between Mr. Beauchamp and herself. She stated Mr. Beauchamp attempted to fire her and Staff Member 4 (SM4) for alleged conflict with the head cook. Ms. Justin stated she notified Mr. Beauchamp’s supervisor of the concerns and Mr. Beauchamp was removed from his duties as the camp director as of 7/31 but that he must remain onsite because of the licensing requirements.

As of the writing of this report, the department has not received any updated change of administration notice nor has the department received licensing record clearance and livescan fingerprint as required for camp administrators for Ms. Justin.

On 10/14/24, I interviewed Veterans of Foreign Wars (VFW) Department of Michigan, State Adjutant Quartermaster, Barry Walters. Mr. Walters stated he is the secretary of the Board of Directors for Camp Trotter. Mr. Walters stated the camp board has relieved the previous director Mr. Beauchamp from responsibilities of

being the camp director and have no other person affiliated to the license at this time.

R 400.11109	**Staff.**
	(1) A camp shall have a camp director who is on duty or in residence at the campsite and who is responsible for the day-to-day administration of the camp and for assuring the care, safety, and protection of campers.
FOR REFERENCE:	**(2) A camp director shall meet all of the following requirements:** **(a) Be not less than 21 years of age.** **(b) Have a minimum of 8 weeks of cumulative full-time experience working with a population similar to that which the camp serves.** **(c) Have a minimum of 4 weeks of full-time administrative experience in an organized camp or similar program.** **(d) A camp director shall be familiar with these administrative rules.** **(3) A camp shall notify the department within 30 days of employing a new camp director.** **(4) If the camp director is away from the operation for more than 12 hours, the person who is left in charge shall meet all of the requirements specified in subrule (2) of this rule.**
FOR REFERENCE	**MCL 722.115(c)**
	(1) Except as provided in subsection (6), when a person or partnership, or licensee designee if the applicant is a limited liability corporation, firm, corporation, association, nongovernmental organization, or governmental organization applies for a license for a child care organization under section 5, the department shall request the department of state police to perform a criminal history check on the person, licensee designee, chief administrator, and program director of a child care organization.
ANAYLSIS:	Interviews and records reveal the camp director was not responsible for the day-to-day supervision of the campers. A substitute director was functionally acting as the camp director without knowledge of the administrative rules and without

	having completed the required livescan fingerprinting and comprehensive background checks required under MCL 722.115(c).
CONCLUSION:	**VIOLATION ESTABLISHED**

On 10/23/24, I reviewed SM2's staff file. The staff record included an application with three personal references listed. However, the personal references did not have any verification that the reference checks were completed nor were all the references from persons unrelated to the applicant. The file had no evidence of background checks including ICHAT or central registry check completed. The staff record did not contain any disciplinary records. The file contained a staff health record. There was no record of interview notes.

R 400.11109(6)	**Staff.**
	(6) Before assignment, a camp shall evaluate all of the following characteristics for each staff member in relation to the duties to be assigned: **(a) Character.** **(b) Emotional stability.** **(c) Health.** **(d) Ability.** **(e) Experience.** **(f) Education.**
ANALYSIS	Interviews and records review the camp did not have an adequate process for evaluating the characteristics for SM2 prior to initial assignment of working with campers. The camp utilized a phone interview with incomplete reference process. The camp did not comply with this rule.
CONCLUSION	**VIOLATION ESTABLISHED**

I reviewed the training records. The camp had a training document titled "Tentative 2024 Training Schedule." The training schedule included dates from 6/24-6/28/24. The daily schedule included sessions titled "Camp Life: Policies, Procedures, Expectations, etc." from 11:00am to 12:00pm on 6/24. In addition, there was a section titled "Camp tour, discuss general policies of each area (if specified)" from 1:00pm-3:00pm on 6/24. However, there was no specificity for the topics covered. In addition, there was no mention of "behavior management," "ages and stages," "supervision," or "child protection" within the training schedule. The training schedule included topics such as program area training: nature center, arts and crafts, adventure course, and waterfront to name a few. The camp could not provide evidence of individual staff attendance in any of the training sessions.

R 400.11109(9)	**Staff.**
	(9) A camp shall establish and provide a pre-camp training program for staff members. A camp shall ensure that the overall training time, including pre-camp training, shall be not less than 3 hours for each week a person works for the first 10 weeks of the camp's operation.
FOR REFERENCE	
	10) A camp shall ensure that the program content for the pre-camp training is in writing and includes all of the following information: **(a) The camp's philosophy, objectives, policies, and operating procedures.** **(b) Procedures and requirements of these rules related to each staff member's duties.** **(c) Camper behavior management.** **(d) Developmental needs of the population that is served.** **(e) Acceptable techniques of camper supervision.**
ANALYSIS	Interviews and records reveal the camp had a general training outline but could not verify each staff member attended training. In addition, the training plan did not cover the required pre-camp training topics. The camp did not comply with this rule.
CONCLUSION	**VIOLATION ESTABLISHED**

On 10/23/2024, I conducted an exit conference in person with Mr. Walters. I reviewed the findings of this report. Mr. Walters stated he understood the report and will be providing an acceptable corrective action plan. In addition, Mr. Walters stated with the turn-over of director(s) and staff challenges from 2024, the organization is considering options for operating a summer camp moving forward. He is working with the board of the camp to develop an acceptable corrective action plan moving forward.

IV. RECOMMENDATION

Upon submission of an acceptable corrective action plan, I recommend no change in license status.

James VandenHeuvel 10/24/2024

James P. VandenHeuvel, Lead Licensing Consultant Date

Approved By:

Richard Lower 10/30/2024

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Richard Lower, Director Date
Out-of-School Time Learning and Camp Licensing