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

GRETCHEN WHITMER
GOVERNOR

BEVERLY WALKER-GRIFFEA
DIRECTOR

Big Laker Adventure Camp
Grand Valley State University
1 Campus Drive Allendale, MI 49401

October 10, 2025

RE: License #: CD700412134
Investigation #: 2025C0455003

Dear Daphnea Sutherland:

Attached is the Special Investigation Report for the above-mentioned 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:

- 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.
- Signed and dated corrective action plan.

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. If I am not available and you need to speak to someone immediately, please contact the licensing unit at 517-284-9730.

Sincerely,

Wendy Borden

Wendy Borden, Licensing Consultant
Camp Licensing Unit
105 W. Allegan St. 2nd Floor
Lansing, MI 48909

enclosure

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

I. IDENTIFYING INFORMATION

License #:	CD700412134
Investigation #:	2025C0455003
Complaint Receipt Date:	August 1, 2025
Investigation Initiation Date:	August 5, 2025
Report Due Date:	October 1, 2025
Licensee Name:	Grand Valley State University
Licensee Address:	1 Campus Drive Allendale, MI 49401
Licensee Telephone #:	(616) 331-5437
Administrator:	Daphnea Sutherland
Name of Camp:	Big Laker Adventure Camp
Camp Address:	10515 Laker Village DrAlle., Allendale, MI 49401
Camp Telephone #:	(616) 634-2065
License Status:	Active
Effective Date:	12/13/2024
Expiration Date:	12/12/2026
Capacity:	25
Camp License Type:	Day Camp

II. ALLEGATION(S)

	Violation Established?
Campers engaged in inappropriate contact over the clothing	Yes
Additional Findings: Camp did not provide adequate staff training	Yes
Additional Findings: Assistant Camp Director does not meet qualifications	Yes

III. METHODOLOGY

07/31/2005	Contact – Phone Call
08/01/2025	Special Investigation Intake 2025C0455003
8/5/2025	Special Investigation Initiated onsite
8/8/2025	Contact – Document Received
8/11/2025	Contact – Document Received
8/29/2025	Contact – Phone Call
8/30/2025	Contact – Phone Call
9/10/2025	Contact – Document Received
9/19/2025	Contact – Phone Call Made
10/09/2025	Exit Conference
10/10/2025	Corrective Action Plan Requested and Due by 10/25/2025

IV. INVESTIGATION AND FINDINGS

ALLEGATION:

Campers engaged in inappropriate contact over the clothing.

INVESTIGATION:

On 7/29/2025, Daphnea Sutherland, the licensee at Big Laker Adventure Camp contacted camp licensing with questions regarding reporting for a camper that touched another camper's vagina.

On 7/30/2025, I emailed Ms. Sutherland with information regarding the duties under PA 238 of 1975 and the requirement to follow their child protection policy (R400.11115). Mandated reporters are required to report suspicion of any abuse or neglect to Centralized Intake when they have reasonable cause to suspect child abuse or child neglect. When child on child sexual behavior occurs, there is reasonable cause given the allegations of sexual contact between campers.

On 8/1/2025, the department received an intake from Michigan Department of Health and Human Services (MDHHS) Centralized Intake. The intake report stated, "On 07-24-2025, Camper B touched Camper A's vagina over her clothes. No penetration occurred. Camper A and Camper B do not have any marks or bruises."

On 8/8/2025, I conducted an onsite inspection. I spoke with staff member 3 (SM3) and staff member 4 (SM4) regarding the incident. The staff working on the day of the incident, staff member 1 (SM1) and staff member 2 (SM2), were not onsite and were later contacted by phone for an interview. I reviewed the personnel files, staff and camper rosters, child and adult child protection policy, training documents, and the behavior management policy.

The incident happened at approximately 4:30 p.m. during camper free time. There were two staff members on duty, SM1 and SM2, and 12 campers. During the hours of 4:00 - 6:00 p.m., parents pick up campers who have free time or participate in group games. At the time of the incident, SM1 was helping set up a golf activity. SM2 was engaged with a separate group of campers. An unknown camper began yelling that Camper B touched Camper A's vagina which alerted the staff.

On 8/29/2025, I spoke with SM2. They explained that they did not see the incident. SM2 was playing golf outside with campers near the parent pick up area. SM2 heard SM1 yell at Camper B to get away from Camper A. SM1 showed SM2 a text about the situation to maintain privacy. SM1 asked SM2 to stay with Camper A because SM1 had to give an incident report to another parent regarding a separate issue. SM2 noted that Camper A was sad, upset, and sitting alone.

On 8/30/2025, I spoke with SM1 who did not witness the incident. SM1 stated that it happened after they turned around and SM1 had their eyes off the campers for less than 2 minutes while they were setting up a play golf set. SM1 separated the campers and asked Camper A about the incident. Camper A and Camper B were playing with each other's earrings. Then, Camper B touched her vagina over her clothes. SM2 stated Camper A seemed stressed, overwhelmed, and uncomfortable.

SM1 contacted SM3 by text to assist with the incident. SM3 is not on camp staff; however, works in the childcare center that offers the camp program. SM3 stayed inside with Camper A until they were picked up.

Camper A was picked up by a family member and was informed of the incident. Camper B was not picked up by a parent and the parent was contacted the next morning by Ms. Sutherland. SM1 reported to SM3 that Camper B was also trying to hit other camper students in the groin area and SM1 instructed Camper B to keep his hands to himself. Both campers returned the following day without incident.

On 9/10/2025, I reviewed the camp's "Behavior Management Policy" which states that "All campers must be in sight and sound…and a camp counselor may never deprive any child of food, place a child alone without supervision and observation, or subject a child to hazing, ridicule, threat, corporal punishment, excessive exercise or excessive restraint."

The camper roster for July 24, 2025, was reviewed and confirmed that the camp was within ratio. SM1 and SM2 were the only staff on duty, and neither witnessed the incident due to being engaged with other campers and activity setup. Campers were spread out on the lawn during free time and not in one area. While the camp staff maintained proper ratios, the campers were dispersed during free time and not under direct supervision.

APPLICABLE RULE	
R 400.11113	**Behavior management**
	(1) A camp shall have and follow a written camper behavior management policy.
ANALYSIS:	Interviews and records reveal the camp has a behavior management policy. Camp staff promptly notified leadership, conducted an investigation, separated campers, and parents were notified. Campers lacked direct supervision due to camp staff being busy with activity set up and being engaged with parents during check-out.
CONCLUSION:	**VIOLATION ESTABLISHED**

ALLEGATION:

Additional Finding: Camp did not provide adequate staff training.

INVESTIGATION:

On 9/10/2025, I reviewed the staff training documents. The camp operated for 10 weeks, from June 9, 2025, to August 15, 2025. The training schedule shows six

hours of training from June 2–4, 2025. An additional six hours were scheduled on July 5, 2025; however, that time was dedicated to setting up day camp rather than training. After camp started, there was a 2-hour training session on June 17, 2025. The camp also held seven 1-hour weekly staff meetings to “check-in and discuss any challenges that have arisen and plan for the week.” A total of 27 hours qualified as staff training and the requirement is 33 hours.

The program content for the pre-camp training was not provided to camp staff at the start of camp and lacked several required components. During interviews, staff (SM1, SM2, and SM4) were asked if the training prepared them to perform their duties. Responses included: “I wish we had a better breakdown on how to handle situations,” “a clear and consistent behavior plan would be helpful,” “hard to know and find the right discipline,” “training could have been a lot better,” and “would like more involvement and training from the directors.”

APPLICABLE RULE	
R 400.11109 (9, 10, 11)	**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. **(10) A camp shall ensure that the program content for the pre-camp training is in writing and includes all 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.** **(11) A camp shall establish and provide an in-service training program for staff members. A camp shall maintain a written record of the training content, dates, and times.**
ANALYSIS:	The camp has a pre-camp training program; however, it lacked the required hours and content. The training content for in-staff training was not defined nor in writing.
CONCLUSION:	**VIOLATION ESTABLISHED**

ALLEGATION:

Additional Finding: Assistant Camp Director did not meet the requirements.

INVESTIGATION:

The Camp Director was not on-site on the day of the incident. The Assistant Camp Director, SM4, was on-site but not present during the incident. During staff interview with SM1 and SM2, it was revealed that staff member 5 (SM5), the Camp Director, had been absent for a week during the camp season.

On 9/19/2025, an interview with SM4 revealed that she had not been provided with the *State of Michigan Licensing Rules for Children's Camps and Adult Foster Care Camps*. If the camp director is away from the operation for more than 12 hours, the person left in charge shall meet all of the requirements specified in subrule (2) of this rule (R 400.11109). SM4 was not knowledgeable of the rules.

An applicant, licensee designee, camp director, or assistant camp director has oversight of day-to-day general camp management and must ensure compliance with statute and administrative rules. Camps must identify their camp leaders and determine who assists in the management of the day-to-day operations of the program. MCL 722.115d mandates that staff in these positions complete a Criminal History Check (livescan fingerprint) and Licensing Record Clearance to be affiliated with a children's camp or campsite license. This process requires completion and submission of the "Licensing Record Clearance Request" (BCAL 1326-Camp) and "Livescan Fingerprint Request" (RI-030) forms. SM4 was not fingerprinted.

APPLICABLE RULE	
R 400.11109 (4)	**Staff**
	(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. **(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:	Camp directors and other camp administrators must complete a Livescan fingerprint check and licensing record clearance to meet Michigan statutory requirements.
ANALYSIS:	The assistant camp director assists in the management of the day-to-day operations for the camp program and is required to be fingerprinted. The assistant camp director was the acting camp director for one week and was provided or knowledgeable with the State of Michigan camp licensing rules.
CONCLUSION:	**VIOLATION ESTABLISHED**

On 10/9/2025, I conducted an exit conference over Microsoft Teams with Daphnea Sutherland, Erin Korte and Jennifer Evert. I reviewed the findings of this report and Ms. Sutherland did not question the results and accepted the outcome of the investigation.

V. RECOMMENDATION

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

Wendy Borden 9/19/2025

Wendy Borden Date
Licensing Consultant

Approved By:

D S. Ramsey 10/02/2025

Deondra Ramsey, Manager Date
Out-of-School Time Learning and Camp Licensing