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

GRETCHEN WHITMER
GOVERNOR

BEVERLY WALKER-GRIFFEA
DIRECTOR

William Keppen
Jack E. Kirksey Recreation Center
15100 Hubbard St.
Livonia, MI 48154

12/18/2025

RE: License #: SD820296594
Investigation #: 2025C0434024
Camp Swoosh/Jack E. Kirksey Recreation Center
15100 Hubbard St.
Livonia, MI 48154

Dear William Keppen:

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 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.
- 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 833-665-8116.

Sincerely,

James Vanden Heuvel

James Vanden Heuvel, Lead 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 #:	SD820296594
Investigation #:	2025C0434024
Complaint Receipt Date:	8/18/2025
Investigation Initiation Date:	8/18/2025
Report Due Date:	10/18/2025
Licensee Name:	Jack E. Kirksey Recreation Center
Licensee Address:	15100 Hubbard St. Livonia, MI 48154
Licensee Telephone #:	734-466-2900
Administrator:	Megan Duby
Name of Camp:	Camp Swoosh/Jack E. Kirksey Recreation Center
Camp Address:	15100 Hubbard St. Livonia, MI 48154
Camp Telephone #:	734-466-2900
License Status:	Regular
Effective Date:	8/3/2024
Expiration Date:	8/2/2026
Capacity:	80
Camp License Type:	Campsite-Day

II. ALLEGATION(S)

	Violation Established?
Camper A fell to the ground while on climbing tower.	Yes
Additional Findings	Yes

III. METHODOLOGY

08/18/2025	Special Investigation Intake
08/18/2025	Special Investigation Initiated-Telephone
08/18/2025	Inspection Completed-Onsite
08/20/2025	Contact-Document Received
08/26/2025	Contact-Telephone Call Made
10/28/2025	Contact-Telephone Call Made
12/02/2025	Contact-Telephone Call Made
12/10/2025	Inspection in Sub Compliance
12/18/2025	Corrective Action Plan requested and due by 1/05/26
12/18/2025	Exit Conference with licensee designee, William Keppen and camp administrator Megan Duby by telephone.

IV. INVESTIGATION AND FINDINGS

ALLEGATION:

Camper A fell to the ground while on climbing tower.

INVESTIGATION:

On 8/18/2025, the department received an online incident report submitted by the camp administration. The incident report read in part that on 08/14/2025, Staff Member 1 (SM1) was belaying Camper A on the rock wall when on the way down, Camper A became unclipped from the carabiner and Camper A fell to the ground. The report read that EMS was contacted, and Camper A was transported to the hospital.

On 8/18/2025, I conducted an onsite inspection at the facility. I interviewed licensee designee, Billy Keppen and camp director, Megan Duby; reviewed high adventure statement(s), maintenance and inspection records, training records; and observed the climbing wall and equipment.

Ms. Duby stated on 8/14/2025, Camper A was enrolled as a day camper and was involved in a climbing wall activity period. Ms. Duby described how she arrived at the climbing wall activity at the moment when the incident occurred. She observed Camper A holding onto a carabiner that was disconnected from the harness at approximately 18-20 feet off the ground at which time Camper A could no longer hold on and fell to the ground. Ms. Duby observed SM1 belaying Camper A and Staff Member 2 (SM2) positioned under Camper A to attempt to catch or break the fall to the ground. Ms. Duby saw Camper A fall through the arms of SM2 and land on the ground “on his stomach”. Ms. Duby stated immediately 911 was called and staff kept Camper A in the position until EMS arrived and took over care. Camper A was described as alert with no apparent injuries but complaints about stomach pain. Local EMS/Fire transported Camper A to the Corwell Farmington Hills Hospital. Ms. Duby stated Camper A’s parent was contacted and Parent A met Ms. Duby at the hospital at which time, Camper A supervision was turned over to Parent A. Ms. Duby was not sure if the camper was admitted to the hospital but thought the camper had been transported to another hospital.

The facilities director, Mr. Keppen, stated the climbing wall, ropes, and other equipment is regularly inspected and maintained in accordance with standards. He could not provide the standards referenced beyond the organization’s internal standards. The incident was captured in part by a surveillance video which was available for review. Mr. Keppen stated the video showed much of the incident but because of the angle it did not capture how Camper A became disconnected from the safety system.

I observed the climbing wall surveillance video on Mr. Keppen’s computer. The camera view was a broad view from across the lobby to the climbing wall. The video included footage of Camper A approaching the climbing wall with a harness on, SM1 verifying harness was placed with double check of the buckles, SM1 sending Camper A to SM2 to verify harness fit, Camper A returning to SM1 for safety rope to be attached, Camper A climbing the wall approximately 20-25 feet on belay (safety rope) by SM1 using a waterfall belay technique, at which time, video of Camper A climbing was obstructed due to structure of the wall. Camper A’s feet were observed not making contact with the wall with Camper A’s upper body and head not visible. Camper A then comes into view of the video footage with hands holding belay rope/carabiner above their head and with feet dangling. SM1 appeared to get SM2’s attention. SM2 approached the wall looking up at Camper A. SM1 slowly lowered Camper A toward the ground as SM2 moved closer to the wall with attention on Camper A. Camper A held onto the carabiner/belay rope with both hands with no contact with the wall. Camper A was approximately 25 feet off the ground. Camper A let go as SM2 moved to a position below Camper A as an apparent attempt to catch

or break the fall to the ground. Camper A hit the ground with upper anterior abdomen through the arms of SM2. SM2 provided care while Camper A lay on the ground, SM1 can be seen making phone calls and Ms. Duby leaving the area for help. Additional staff arrived including lifeguard staff members with first aid supplies. The video includes the arrival of Livonia Fire Department with Camper A care assumed by Fire/EMS. Mr. Keppen provided a copy of the video footage on a thumb drive.

Ms. Duby stated she conducts the camp staff training on the operation of the climbing wall. She stated she does not have any special trainer certification or qualification. The climbing and camp staff obtain training verification through the use a skills verification “checklist”. The summer camp staff were trained on 5/30/2025 between 9am-12pm. The training was approximately 2 hours long even though it was scheduled for three hours. Ms. Duby stated during the rock wall training period, the facility lost power resulting in the dismissal of the training.

I conducted a systematic observation of video footage leading up to and throughout the reported incident. The times and description are outlined in the table below.

Time	**Video Description**
9:22:40	Camper A approaches SM1 to prepare for climbing. SM1 looks at harness right leg (RL) loop and checks for tension by pulling on RL harness tail.
9:22:53	SM1 looks at harness left leg (LL) loop and checks for tension by pulling on LL harness tail.
9:23:04	SM1 checks belay loop on harness by pulling tension on harness loop.
9:23:26	SM1 double checks RL harness buckle and tail.
9:23:45	SM1 has Camper A walk over to SM2 to double check harness. SM2 checks RL and LL buckles and tail for tension.
9:24:07	SM1 appears to attach carabiner from the top-down position connecting belay rope to Camper A’s harness belay loop. SM1 attaches but does not test the gate of the carabiner to ensure gate locks.
9:24:10	Camper A walks towards wall while SM1 gets into position for belaying. SM1 had harness on and appeared connected to belay rope and belay device.
9:24:13	SM1 removes slack from belay rope two times by using two handed waterfall technique. There appears to be a brief conversation between SM1, and Camper A as evidenced by facing each other before climbing. Note: The video does not have audio.
9:24:20	Camper A starts climbing on the wall and SM1 takes slack from belay rope using two handed waterfall techniques. With Camper A on the wall making small steps of movement, SM1 continued to take slack out of the rope at an accelerated rate.
9:24:20 through 9:27:01	SM1 continued belaying with waterfall technique. SM1 had 44 observed belay arm movements and Camper A had 22 observed climbing movements. SM1 was observed to have eyes off climber 34 times during the 160 seconds of Camper A’s climb. SM1 was observed looking side to side and behind herself. There were other campers (11 campers) observed sitting or playing outside of the belay area with SM2 assisting with harnessing.

9:27:01	Camper A is obstructed on the wall from video view. SM1 has noticeable alertness to a problem as evidenced by attention focused on Camper A, body movement focused and not moving.
9:27:19	SM1 gets attention from SM2 who is nearby helping harness other campers. SM2 looks up at the wall.
9:27:32	SM2 moves rapidly towards the wall. SM1 appears to be slowly giving slack to lower Camper A who is holding onto the disconnected belay rope.
9:27:42	SM1 continues to give slow slack to lower camper A to the ground. Camper A is unable to hold onto the belay rope any longer and falls 20-25 feet to the ground. Camper A held onto the rope for approximately 10 seconds as SM1 lowered Camper A approximately 4-5 feet of a 25-foot distance before Camper A fell to the ground.

On 8/26/2025, I contacted Parent A by telephone to interview Camper A and/or Parent A. Parent A did not want to talk with me prior to talking with her attorney. Parent A took my contact information. To the writing of this report, the parent has not granted approval to interview Camper A.

On 10/28/2025, I sent a FOIA request to the city of Livonia police department requesting police report record. A FOIA response was received indicating there were no police records of the incident.

On 10/28/2025, I interviewed SM1 by telephone. SM1 stated they were a 1st year counselor and 1st year belayer at the camp. SM1 was the belayer for Camper A. SM1 stated she was trained for belaying by the camp director, Ms. Duby, during staff training at the beginning of the summer and may have received written operation procedures but couldn't remember. SM1 explained the training involved a few days of practice at the climbing wall spending time with knots and "clips". I asked SM1 to name the types of knots used at the climbing wall and the equipment names for "clips" and the harness "loops". SM1 could not use the specific names for the knots, "clips", belay device, and harness "loops". SM1 did not receive a certification for the belaying training that was completed. SM1 was asked if there was any double check completed after Camper A put on the harness. SM1 explained Camper A was the 2nd climber that used the climbing wall during the morning activity block. The first camper had no problems with equipment or climbing the wall. SM1 described checking Camper A's harness and then sending Camper A over to SM2 who was helping other campers with harnessing to double check the harness. Camper A returned to SM1 after the double check and SM1 attached Camper A to the belay rope by "clipping" the "clip" onto the harness loop on the front of Camper A's harness. SM1 reported conducting a squeeze test to the "clip" (carabiner). SM1 then directed Camper A towards the climbing wall surface to start the climb. I asked if SM1 and Camper A used any commands such as "belay on", "on belay", "climbing", "climb on". SM1 stated no commands were used with the climbers. SM1 recalled Camper A climbing "pretty slow" on the wall. During the climb, SM1 recalled hearing Camper A on the wall "screaming" and holding onto the belay rope above his head. SM2 came over towards the wall to position under Camper A and SM1 attempted to lower Camper A "slowly and carefully" down. SM1 stated Camper A released his grip

on the rope and fell to the ground. SM1 stated Camper A's harness was still attached without apparent damage and the belay rope and carabiner were still dangling from the wall. SM1 reported the separation in the safety system was between the harness loop and the carabiner. SM1 stated Camper A fell landing on the stomach and was moving shortly upon landing. SM2 stayed with Camper A while SM1 called 911. SM1 was unsure of Camper A's injuries.

On 12/2/2025, I interviewed SM2 by telephone. SM2 was a 3rd year counselor at the camp. On the day of the incident, SM2 was assigned as a rock wall activity leader along with SM1. SM2 described the role as harnessing campers while also watching campers that were observers at the wall. SM2 recalled harnessing Camper A and then conducted a double check of Camper A's harness after Camper A went to SM1 to go climbing. While SM2 was harnessing another camper, SM2 heard Camper A screaming and then observed Camper A disconnected from the carabiner and hanging on to the carabiner above Camper A's head. SM2 went towards the wall to attempt to catch or support Camper A if a fall occurred. SM2 recalled Camper A falling to the ground from a height through SM2's arms. SM2 stated Camper A initially appeared unresponsive with no obvious signs of injury or blood. Camper A then began to moan and SM2 observed that Camper A could move arms and feet. SM2 reported that lifeguards came over to support the situation and SM2 moved with the other campers to a separate area so not to be near the scene. SM2 did not know how the rope and clip disconnected from Camper A's harness. SM2 observed the harness as being intact on camper A and the rope with carabiner was elevated on the wall. SM2 described the carabiner as a twist and open carabiner. SM2 stated staff were trained in the operation of the climbing wall during the pre-camp training. SM2 believed the policies and procedures were written and provided to all the staff on how to safely operate the climbing wall.

Mr. Keppen provided written high adventure statement documents including the "Climbing Wall Staff Handbook", "R400.11401 High Adventure Activities", "camp staff training verification 2025", and "Climbing Wall Orientation". The following sections are a review of the High Adventure Statement Sections of R400.11401(2) and the camp's documents that are relevant to the noted section.

Activity Leader Training and Experience Qualifications: **[R400.11401(2)(a)]**

I reviewed the document titled "*R400.11401 High Adventure Activities*". The document reads, "*Camp Swoosh participates in Aquatics and Climbing or Rappelling. Below is the supporting documentation for adherence to the rules."* Section (a) included information about activity leader training and experience qualifications. The section reads "

> "Activity leaders are trained in proper equipment use at the rock wall, which includes harnesses, carabiners, and belay devices. Activity leaders are also trained in proper knot tying, belay technique, and voice commands prior to conducting climbing activities."

The written high adventure statement reads, “Recreation Supervisor Megan Duby” as responsible for training the camp activity leaders and ensuring they have a firm grasp on the concepts and techniques. The statement provides Ms. Duby has more than four years of experience at the rock wall including her time as a “climbing wall attendant and instructor.” Ms. Duby was trained by rock wall coordinator Staff Member 3 (SM3) “who has a wealth of climbing experience and has been the Rock Wall Coordinator with Livonia Parks and Recreation since 2017”. The statement does not include any details about length of training, certification requirements, verification of skills, qualifications of trainers, or frequency of training for the activity leaders or trainers. The statement does not include information about the training, experience, qualification of the “Rock Wall Coordinator” or the rock wall staff who are certifying belayers. Within the section titled “Safety Precautions” the paragraph reads “*All belayers MUST be certified by a member of the rock wall staff in order to belay*” and “*all activity leaders (camp staff) participating in climbing or belaying are trained to conduct the activity safely*.” SM1 and SM2 did not have any documents of certification in the rock wall.

I reviewed a document titled “Climbing Wall Staff Handbook 2024”. The document includes an opening paragraph that reads “This handbook outlines all the responsibilities, safety procedures, and technical knowledge necessary for our climbing wall staff.” The document includes sections titled: *general policies, pre-climbing procedures, belay techniques and knot-tying instructions, climbing commands and safety protocols, staff duties and responsibilities, equipment inspection and maintenance, emergency procedures, and opening and closing procedures.* The Climbing Wall Staff Handbook does not provide details for the roles of climbing wall attendance, belayer, or leader for certification of belayers and lead climber certifications or verification of self-belay. Though the handbook does include information that individuals can receive “certification” for belaying and lead climber certification. It does not provide any details about who approves the certification and what qualification the approved candidate must certify participants in belaying or lead climbing. In addition, in the section titled “Belay Certification Test for Climbers” the document includes the statement, “*Climbers who wish to belay others must pass a belay certification test to demonstrate mastery of proper techniques, commands, and safety protocols. The following skills must be demonstrated successfully under staff supervision*”. The document identifies “equipment set up”, “knot tying”, “voice commands”, “belay technique”, “Catching a Falling Climber”, “Lowering a Climber”, “Situational Awareness and Safety Practices”, “Emergency Stop Knowledge”, “Certification Criteria”, and “Recertification and Spot Checks”. There was no evidence that SM1 or SM2 had received this certification prior to belaying campers.

I reviewed the staff training schedule agenda described by Ms. Duby as the rock wall training schedule that occurred on 5/30/2025. The schedule included a section titled “Rockwall Training” and included the following bulleted items: “show where to get the key; show how to get ladder down; grab harnesses; how to put harness on; how to tie ropes; how to belay; practice”. I reviewed the sign-in sheet for the training. The

sign-in sheet included SM1 and SM2's signatures as present. The training schedule agenda did not include specific information about reviewing written operation documents like the climbing wall staff handbook or high adventure statements, rock wall emergency procedures, information about inspection and maintenance of equipment and area, or verification process of belay skills, testing of belay skills, or certification of belay skills.

I reviewed the document titled "Camp Training Verification 2025" for both SM1 and SM2. The document included a paragraph describing the required minimum training for camp swoosh staff of being a minimum of 30 hours. The document included the training schedule for 2025 with in person dates with times and additional online training requirements. The documents were signed and dated by SM1 and SM2 attesting to completion of the camp's required training. The training schedule included times/dates but did not provide content of the training on the particular days nor any noted regarding belay certifications for either SM1 or SM2.

Arrangement, Maintenance, and Inspection of the Activity Area. **[R400.11401(2)(d)]**

The "*High Adventure Activities"* statement included a section (d) that read, "*Activity area is inspected daily by Camp Swoosh staff, and regular equipment checks are performed by evening rock wall staff as well. All climbing equipment and ropes are inspected on a weekly schedule, and retired when found to be unsafe, worn out, or suspicion of any issues.*" The statement does not include specific detail about the of the "activity area" that is inspected daily by staff. The statement does not address arrangement, maintenance, and what is inspected in the activity area or documentation of inspection. The statement does not describe the number of climbs, which climbing areas are rated for beginners, moderate, or advanced climbers, which areas are used for campers and areas used for public guests, how the climbing areas are separate or arranged to limit camper/public interaction. The inspection statement does not include inspection details about the rock wall, handholds, top belay point on a weekly, monthly, annual basis.

I reviewed the document titled "Rock Wall Staff Nightly Report". This report has been completed and submitted to the facilities manager. The report includes dates, staff person submitting, and performed tasks with check marks as completed. The document section titled "I performed the following tasks (check those that apply)" included the check mark for such as: 'rope inspection (Walls 1-6), rope inspection (Walls 8-13), belay device & carabiner inspection, party harness inspection." The report for 8/13/2025 was completed by Staff Member 4 (SM4). The document section titled "I performed the following tasks (check those that apply)" included the check mark for the item "belay device & carabiner inspection" and a comment reading "all good" and a line through the items "climber/Belayer Report"; "Staff/Team Member Report"; and "Other Items to Report". There were no check marks indicating "Rope inspection (Walls 1-6)"; "Rope Inspection (Walls 8-13)"; or "Party harness inspection". The "Rock Wall Staff Nightly Report" does not include information about the arrangement, inspection, or maintenance of the rock wall area.

Appropriate equipment and the inspection and maintenance of the equipment. [R400.11401(2)(e)]

The "*High Adventure Activities"* statement included a section (e) that read "*Activity area is inspected daily by Camp Swoosh staff, and evening rock wall attendants. All climbing equipment and ropes are inspected on a weekly schedule, and retired when found to be unsafe, worn out, or suspicion of any issues.*" The policy statement does not include details about documentation of daily, weekly, monthly, or annual inspection of the harnesses, carabiners, ropes, top belay point, handholds, or wall surface. The statement also did not include a description of the types of equipment that are appropriate for climbing, including brands, types, and descriptions.

The section titled, "Belay Techniques and Knot-Tying Instructions" includes bullet section about "figure-8 Knot", "Follow-Through Knot", and "Safety Knots". The "follow-through knot" section reads "thread the rope through the harness before completing the knot, tie the figure-8 knot close to the orange loop but not through it, use the "2-4-6-8-10 check" (check that the knot is clean, with no twists)."

The video footage reveals the camp was not using a "follow-through knot" for Camper A but rather a carabiner to attach the figure eight knot to the harness loop (9:24:07). The section titled "Belay Device Usage" reads "carabiner setup: small side faces the wall or climber's harness. Screw gate: must be locked before climbing begins." The video footage (9:24:07) reveals SM1 did not verify the gate as being locked by double checking the gate after attaching the carabiner to Camper A's harness.

I reviewed the inspection log titled "Rope Condition Inspection". The report included columns titled "Wall #", "Condition", "Comments", and "Date & Signature". The log identified Wall # 3 rope being installed new on 5/27/2025. The condition was listed as "new". The log included dates of inspection with regular weekly checks of the rope and the comments starting on 6/30/2025 as "tiny fuzz on right side" or "small fuzz all over" and continued through 8/18/2025 check. In August the weekly checks were noted on 8/4/2025, 8/11/2025, and 8/18/2025 with a noted condition of "great" with the comments "small fuzz all over".

I observed the carabiner used in the incident. The carabiner was a double action automatic locking steel carabiner. The double-action is a twist and open gate carabiner. The carabiner had observable wear but functioned correctly when it twisted and opened. The carabiner snapped back into locking position when the gate was released. There were no obvious signs of malfunction. I observed document titled "Carabiner Inspection" log which includes columns titled "Carabiner #", "Carabiner style", "Gate opens & closes smoothly", "Auto-lock fully engages", "Gate screws smoothly", "Major wear? Y/N", and "Date & Signature". The log did not include specific identification numbers for carabiners but listed "11 Screws", "2 ladder", 3-Autolock". For the weekly inspection of 8/6/25 completed by initials "AP", the log included lines through the rows for each column for "auto-lock". Ms. Duby

provided that the carabiners do not get labeled individually and if found to not be working correctly, they are removed immediately.

I contacted an Association for Challenge Course Technology (ACCT) inspector vendor organization representative to discuss carabiners used on climbing walls. The ACCT inspector advised that standards don't prevent the use of double action automatic locking carabiners but there have been reported cases of the carabiner gate being opened on climbing walls due to friction and forces applied to the twist gate causing falls. ACCT vendors typically instruct climbing wall operators to use triple action carabiners.

I reviewed a document titled "Rental Harness Inspection". Mr. Keppen described the log as a document verifying the condition of the harnesses that are used at the rock wall. The log includes "Harness #", "Belay Loop Condition", "Leg Loops Condition", "Waist Loop Condition", "Buckles Condition", "Fraying? Y/N", and "Date & Signature". I reviewed the log for 8/14/2025. Camper A was reported as wearing Harness #3 at the time of the incident. The log identified that Harness #3 having the "belay loop" in good condition, the "leg loops" in new condition, the "waist loop" in new condition, the "buckles" in "great" condition, "fraying" as "yes", and dated 8/14/2025 and initialed. In addition, the harness log included dates of inspection on 7/24/2025 and then again on 8/14/2025. The log did not have records for inspection on week of August 4, 2025. Ms. Duby provided that the inspection of the harnesses is weekly. However, there was a gap in documentation from 7/24/2025 and 8/14/2026 of more than two weeks.

Safety precautions **[R400.11401(2)(f)]**

Within the *Climbing Wall Staff Handbook*, Section 5 titled "Staff Duties and Responsibilities" reads "*during operational hours: actively monitor both climbers and belayers for proper technique. Ensure all rules are followed safety is the priority."* The video footage (9:24:20 through 9:27:01) reveals the SM1 (belayer) has multiple instances of eyes not on-climber as evidenced by SM1 head scanning around to the other campers and apparent distraction. SM1 stated during the interview SM1 heard "screaming" and looked up to see Camper A disconnected from the belay system and holding onto the carabiner above Camper A's head. SM1 could not provide an explanation for the disconnected safety system.

Within Section 4: "Climbing Commands and Safety Protocols", the climbing wall handbook advises the use of the commands: "On belay? (Climber asks if belayer is ready.), Belay on! (Belayer confirms readiness), Climbing! (Climber indicates they are starting), Climb on! (Belayer confirms.)." Within the section titled "Belay and Equipment Rules", the policy manual reads "Belay Checks: Staff must conduct belay checks before each climb: ensure belay devices are correctly installed with screw gates locked, confirm voice commands are properly exchanged between climber and belayer." The video footage (9:24:13) as Camper A approaches the wall to climb, there appears to be a brief conversation but not audible. SM1 admitted during

their interview, they did not use the command system prior to Camper A climbing the wall. SM1 stated they told Camper A to “not start climbing”.

The “*High Adventure Activities”* statement read within the “safety precautions” section “all belayers MUST be certified by a member of the rock wall staff in order to belay.” Mr. Keppen could not produce records of certification of the rock wall staff beyond the training signature sheet showing attendance. The other safety precautions identified did not include specific information about rock wall rules of use or other specific information to operating the activity safely such as command systems, belay techniques, avoiding standing on belay ropes or dropping equipment, where to sit for observation and expectations of conduct while at the climbing activity, safety concerns that need to be brought to the attention of activity leaders, etc.

APPLICABLE RULE	
400.11401	**High adventure activities; definition; written statement; adult activity leader.**
	(2) For high adventure activities identified in subrule (1) of this rule, and for any activity identified by the licensee as a high adventure activity, the licensee shall develop and assure adherence to a written program statement that covers all the following: **(a) Activity leader training and experience qualifications.** **(b) Specific staff-to-camper ratio appropriate to the activity.** **(c) Classifications and limitations for camper participation.** **(d) Arrangement, maintenance, and inspection of the activity area.** **(e) Appropriate equipment and the inspection and maintenance of the equipment.** **(f) Safety precautions.**
FOR REFERENCE	
R400.11401	**High adventure activities; definition; written statement; adult activity leader.**
	(1) As used in this rule, “high adventure activity” means a camp program that requires specially trained staff or special safety precautions to reduce the possibility of an

	accident. Programs in this category include, but are not limited to, the following: **(e) Climbing and/or rappelling.**
ANALYSIS:	Interviews and records reveal the camp has a high adventure statement and written documents for the operation of climbing wall. The high adventure statement lacks details about staff training and qualifications including certification of belaying, details about arrangement, maintenance and inspection of the activity area, details about appropriate equipment and the inspection and maintenance of the equipment, and safety precautions. There was not sufficient evidence that training and certification occurred for SM1 and SM2 in the operation of the climbing wall. In addition, SM1 did not use the belay command system, squeeze test the carabiner, and appeared distracted from the duties of belaying as evidenced by the frequency of eyes off the climber Camper A's climb and disconnection from the carabiner. SM1 was observed to be slow in belay action to remove slack from Climber A's safety line. The investigation could not determine the cause of the climbing safety system failure. The video was obstructed at the point where Camper A was disconnected, SM1 did not observe the disconnect but only heard the screaming and then observed Camper A hanging onto the rope/carabiner, and Parent A did not allow Camper A to be interviewed for the investigation.
CONCLUSION:	**VIOLATION ESTABLISHED**

Additional Findings

The department received an online incident report submission on 8/18/2025 at 12:15pm. The incident report identified Camper A as climbing on the climbing tower when on the way down he "became unclipped" from the carabiner and falling to the ground. The report identified that 911 was contacted and the camper was transported to a local hospital for care. The report indicated first aid was given onsite. The report identified the incident as occurring on 8/14/2025 at 9:30am.

APPLICABLE RULE	
R400.11127	**Camper health requirements**

	(9) A camp shall submit a written report, on forms furnished by the department, to the department if a camper dies or if a camper has an accident or illness that results in an overnight stay in a hospital or clinic or being sent home. A camp shall submit the report within 48 hours of the death, injury, or illness.
ANALYSIS:	Records reveal the camp operated and did not submit the incident report within the required 48 hours. Camper A was involved in an accident that resulted in a stay at a hospital or being sent home.
CONCLUSION:	**VIOLATION ESTABLISHED**

On 12/18/25, I conducted an exit conference with Ms. Duby and Mr. Keppen . I reviewed the findings of this report. Mr. Keppen stated they will review the report and provide a written corrective action plan within the timelines established.

V. RECOMMENDATION

Upon submission of an acceptable written corrective action plan, I recommend this special investigation be closed.

12/18/2025

James Vanden Heuvel Date
Lead Camp Licensing Consultant

Approved By:

12/18/2025

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