



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

SHELLY EDGERTON  
DIRECTOR

August 24, 2018

Michael Holets  
Harvest Bible Chapel  
800 Rohlwing Rd.  
Rolling Meadows, IL 60008

RE: License #: CR620249476  
Investigation #: **2018C0434004**  
**Harvest Camp**

Dear Mr. Holets:

Attached is the Special Investigation Report for the above referenced facility. Due to the violations identified in the report, a written corrective action plan was required. On August 24, 2018, you submitted an acceptable written corrective action plan, which I approved.

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 local office at (616) 356-0183.

Sincerely,

A handwritten signature in black ink that reads "James P. VandenHeuvel".

James P. VandenHeuvel, Licensing Consultant  
Bureau of Community and Health Systems  
Unit 13, 7th Floor  
350 Ottawa, N.W.  
Grand Rapids, MI 49503  
(616) 901-3730

enclosure

**MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
BUREAU OF COMMUNITY AND HEALTH SYSTEMS  
SPECIAL INVESTIGATION REPORT**

**I. IDENTIFYING INFORMATION**

<b>License License #:</b>	CR620249476
<b>Investigation #:</b>	2018C0434004
<b>Complaint Receipt Date:</b>	08/14/2018
<b>Investigation Initiation Date:</b>	08/14/2018
<b>Report Due Date:</b>	10/13/2018
<b>Licensee Name:</b>	Harvest Bible Chapel
<b>Licensee Address:</b>	800 Rohlwing Rd. Rolling Meadows, IL 60008
<b>Licensee Telephone #:</b>	(847) 398-7005
<b>Licensee Designee:</b>	Michael Holets, Licensee Designee
<b>Name of Facility:</b>	Harvest Camp
<b>Facility Address:</b>	6829 E. 72nd St. Newaygo, MI 49337
<b>Facility Telephone #:</b>	(231) 652-8020
<b>Original Issuance Date:</b>	07/26/2002
<b>License License Status:</b>	REGULAR
<b>Effective Date:</b>	08/13/2017
<b>Expiration Date:</b>	08/12/2019
<b>Capacity:</b>	276
<b>Program Type:</b>	CHILD CAMP - RESIDENTIAL

## II. ALLEGATION(S)

	<b>Violation Established?</b>
The camp did not conduct appropriate background checks on staff.	Yes
The camp did not follow their child protection plan.	Yes
Additional Findings	Yes

## III. METHODOLOGY

08/14/2018	Special Investigation Intake 2018C0434004
08/14/2018	Special Investigation Initiated - Telephone
08/24/2018	Inspection Completed On-site Interviewed camp director, reviewed records and policies.
08/24/2018	Inspection Completed-BCAL Sub. Compliance
08/24/2018	Corrective Action Plan Requested and Due on 09/08/2018
08/24/2018	Corrective Action Plan Received
08/24/2018	Corrective Action Plan Approved
10/15/2018	Exit Conference Findings of the report were reviewed with the camp director.

### **ALLEGATION:**

**The camp did not conduct appropriate background checks on staff.**

## **INVESTIGATION:**

On 8/14/18, A BCAL Online Complaint was received from Centralized Intake regarding an adult staff member (SP#2) inappropriately touching five minor staff persons ages 16-17 at Camp Harvest by touching their bottoms. This was over their clothing with her hand. The adult was not angry when she did this nor was she necessarily joking either. There were no injuries or bruises reported. The complaint was forwarded to Michigan State Police, Maltreatment in Care – CPS (MIC-CPS), and this department.

On 8/14/18, I contacted by phone the director of Camp Harvest, Mike Holets. He directed me to the camp attorney, Chris Nudo. I interviewed Mr. Nudo by telephone. Mr. Nudo stated that minor staff person (SP) #4 disclosed to camp leadership that adult SP #2 inappropriately touched him on the butt. During the follow up investigation by camp leadership other minor staff persons were interviewed and subsequently disclosed that they too had been inappropriately touched on their butts by SP#2 within the work environment. In all there were five minor SP who reported to camp administration of the inappropriate touching. The camp administration decided to call Centralized Intake after the disclosure by SP#1 on 8/13/18. The minor staff all worked within the support services/facilities department of the camp.

Mr. Nudo stated that camp leadership became aware of SP #2's behavior on 8/3/18. He stated the internal investigation determined that the misconduct was inconsistent with the camp's mission and the director terminated SP #2's employment with the camp on 8/3/18. Mr. Nudo stated that while the camp administration became aware of inappropriate behavior on 8/3/18, they did not believe the behavior was reportable until SP #1 divulged information to the director that she had been touched on both her chest and butt by SP#2. Mr. Nudo determined on 8/13/18 that he should make a report to Centralized Intake.

On 8/24/18, I conducted an onsite inspection at Camp Harvest. Mr. Holets provided the personnel record for SP#2, statements by the minor staff, policy/staff handbooks, and staff training records.

I reviewed the personnel record for SP#2. The employee file included an application listing SP#2 over the age of 21. The file did not include a criminal background check or a central registry check. In addition, the record did not contain documentation that established references were contacted to determine her appropriateness working with children. The director stated that SP#2 was hired prior to his arrival and that he did not confirm that the required paperwork was in place in the employee file.

The camp policies lacked specific detail about completing background checks and central registry clearances for all staff and completion of the requirements of rule 400.11109. Mr. Holets described the camp's hiring practices which involve some

aspects of new hire paperwork being completed by the local camp and some being taken care of by the office of the Licensee located in Chicago, Illinois.

<b>APPLICABLE RULE</b>	
<b>R 400.11109</b>	<b>Staff.</b>
	<p><b>(7) A camp shall maintain a personnel record, collected before initial assignment, for each staff member... The record shall include all of the following information:</b></p> <p><b>(d) Three statements of positive reference that are obtained before staff assignment and that are from persons unrelated to the staff member.</b></p> <p><b>(e) A record of any criminal convictions other than minor traffic violations, including at least 1 of the following:</b></p> <p><b>(i) Documentation from the Michigan State Police or the equivalent law enforcement agency from the state, Canadian province, or other country where the person usually resides.</b></p> <p><b>(ii) Documentation from an entity accessing either Michigan State Police records or equivalent law enforcement agency records in the state, Canadian province, or other country where the person usually resides.</b></p> <p><b>(f) Documentation from the Michigan Department of Human Services, the equivalent state or Canadian provincial agency, or equivalent agency in the country where the person usually resides, that any staff person age 21 or over has not been determined to be a perpetrator of child abuse or child neglect.</b></p>
<b>ANALYSIS:</b>	SP #2's personnel record lacked the requirements of this citation. The camp had no record of completing a criminal background check, a check to determine if the staff person is a perpetrator of abuse or neglect, or record of completing reference checks.
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**ALLEGATION:**

The camp did not follow the child protection plan.

## **INVESTIGATION:**

I reviewed the staff handbook including policies and procedures. The camp has written safety standards for staff, volunteer, and campers outlined in their handbook and a requirement to have staff acknowledge the policy. The safety standards include the child protection law, definition of abuse, reporting responsibilities, and procedures. The safety standards stated that “abusive behavior toward staff will not be tolerated”. In addition, the handbook was covered during staff trainings on 5/4/2018- 5/5/2018 and 6/6/2018-6/8/18. The camp did not have documentation of training for SP #2.

I reviewed the written child protection plan. The plan read that the camp will report any situations where “we have reasonable grounds to believe a child is or may be in need of protection.” The camp has developed procedures for dealing with abuse and/or neglect for both campers or staff. The procedures outline clear steps to follow when a report has occurred.

The procedures state:

- Counselor/leader will bring camper/staff to camp director to conduct interview. The camper/staff will share the accusation and answer some questions. The Camp Director will take notes. The notes are to be signed and dated by the Camp Director and the other staff member present. This document to accompany official report along with copy of counselors/leader’s report.
- The Camp Director informs Child Services and Police as would be appropriate to the situation.
- The caller will report to the Michigan state’s child protective services hot line 885-444-3911.
- Camp Director will fill out the DHS-3200 (Official state child protective services report) with any other documents and complete by 72 hours.
- Full reports of the child, story, the official report and all people involved should be filed at the camp office.

Mr. Holets was interviewed and provided the timeline for reporting to Child Protective Services. He reported that he was notified of the misconduct of SP #2 on 8/3/18 by camp staff member SP#8. Mr. Holets contacted his human resources department regarding the allegation and was told to terminate SP#2 which he did on 8/3/18. The camp director instructed SP#8 to collect statements from the minor staff. Mr. Holets stated that he was consulting with his human resources department and legal department regarding the misconduct. The camp administration made the decision to report to Child Protection Services (CPS) on 8/13/18. Mr. Holets reported that he was taking direction from the camp’s legal counsel.

Mr. Nudo, the camp’s legal counsel, stated that the decision to report was informed by the final written statement by SP#1 which was received on 8/8/18.

On 8/18/18, I contacted Mara Iverson, MIC-CPS supervisor, regarding the status of the MIC-CPS response to the intake. She responded that CPS-MIC rejected the complaint and was not investigating.

<b>APPLICABLE RULE</b>	
<b>R 400.11115</b>	<b>Child and adult protection plan.</b>
	<b>(1) A camp shall develop and follow a written plan to assure compliance with 1975 PA 238, MCL 722.621, and known as the child protection law, and sections 11 to 11f and 14 of 1939 PA 280, MCL 400.11 to 400.11f and 400.14, and known as the adult protection law.</b>
<b>For Reference:</b>	<b>(2) The plan shall cover all of the following areas: (a) Reporting responsibilities. (b) Confidentiality. (c) Separation of an alleged perpetrator from campers until the incident is resolved, until the threat is removed, or as long as necessary to protect the safety and welfare of the campers.</b>
<b>ANALYSIS:</b>	The camp's child protection plan is written in the staff handbook. The director did not follow the procedures outlined in the camp's child protection policy. The camp administration became aware of the inappropriate touching on 8/3/18 but did not report to child protection services on 8/13/18.
<b>CONCLUSION:</b>	<b>VIOLATION ESTABLISHED</b>

**IV. RECOMMENDATION**

The camp has provided an acceptable written corrective action plan. It is the expectation that this plan will be followed within the timelines. I recommend the status of the license to remain unchanged.

*James P. VandenHeuvel*  
James P. VandenHeuvel  
Licensing Consultant

10/20/18  
Date

Approved By:

*Russell B. Misiak*  
Russell B. Misiak  
Area Manager

11/26/18  
Date

