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

GRETCHEN WHITMER
GOVERNOR

BEVERLY WALKER-GRIFFEA
DIRECTOR

Krista Beyer
Camp Pa Wa Pi
3235 E Grand River
Williamston, MI 48895

October 21, 2024

RE: License #: CD330238314
Investigation #: 2024C0434021
Camp Pa Wa Pi

Dear Ms. Beyer:

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 office at 616-356-0100.

Sincerely,

James VandenHeuvel

James P. VandenHeuvel, Licensing Consultant
Camp Licensing Unit
105 W. Allegan St. 2nd Floor
Lansing, MI 48933
(616) 901-3730

enclosure

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

I. IDENTIFYING INFORMATION

License #:	CD330238314
Investigation #:	2024C0434021
Complaint Receipt Date:	08/05/2024
Investigation Initiation Date:	08/13/2024
Report Due Date:	10/04/2024
Licensee Name:	YMCA of Lansing
Licensee Address:	900 Long Blvd. Lansing, MI 48911
Licensee Telephone #:	517-827-9690
Administrator:	Krista Beyer
Licensee Designee	Elizabeth Tobia
Name of Facility:	Camp Pa Wa Pi
Facility Address:	3235 E Grand River Williamston, MI 48895
Facility Telephone #:	517-490-5151
Original Issuance Date:	05/23/2002
License Status:	REGULAR
Effective Date:	07/22/2024
Expiration Date:	07/21/2026
Capacity:	160
Program Type:	CHILD CAMP - DAY

II. ALLEGATION(S)

	Violation Established?
Camp staff member subjected Camper A to ridicule after soiling himself.	No
ADDITIONAL FINDINGS	Yes

III. METHODOLOGY

08/05/2024	Special Investigation Intake 2024C0434021
08/13/2024	Special Investigation Initiated - On Site
08/14/2024	Contact - Telephone call made
08/14/2024	Contact - Document Sent
08/14/2024	Contact - Document Received
08/14/2024	Contact - Document Received
08/15/2024	Contact - Telephone call received
10/15/2024	Special Investigation in Sub Compliance
10/15/2024	Corrective Action Plan required and due by 11/05/24
10/15/2024	Exit Conference with by telephone

ALLEGATION:

Camp staff member subjected Camper A to ridicule after soiling himself.

INVESTIGATION:

On 8/13/24, the department received a complaint transferred from Michigan Department of Health and Human Services (MDHHS) Centralized Intake (CI). The complaint alleged a camp staff member sprayed Camper A with a hose after he had soiled himself to clean him. The CI report read the intake was also referred to Ingham County Sheriff's Office for review.

On 8/13/24, I completed an onsite inspection at the camp. I interviewed the seasonal camp director Julia Cronk. Ms. Cronk stated she is a first year camp director at the

facility. She stated on 8/1 a camp staff member observed Camper A participating in the slip-n-slide activity soiled with feces. Ms. Cronk stated it was reported Camper A had feces on the back of his legs. Ms. Cronk stated camp counselor, Staff Member (SM) 1 assisted Camper A by spraying down the back of his legs. Ms. Cronk stated his clothes were on and that Ms. Cronk observed SM1 spray Camper A. Ms. Cronk stated Camper A's parent was contacted to pick him up from camp. Ms. Cronk stated this was the second incident of Camper A soiling himself at camp.

I interviewed SM1 at the camp. SM1 stated he is a first-year sports supervisor at the camp. SM1 stated he had been walking by the slip-n-slide activity when he was notified of the incident. He stated Camper A had soiled himself in his shorts. SM1 stated he had camper A come to towards the side area where the water hose was located and standing approximately five feet away, SM1 sprayed the back of Camper A's legs to remove the feces. SM1 stated Camper A was wearing his shorts. SM1 stated he did not touch Camper A and there were other campers and staff around at the slip-n-slide area. SM1 stated after assisting Camper A, he went onto his activity area of responsibility. SM1 stated he participated in staff training and received a copy of the policy manual last year when he was a camp counselor. However, this year, he was unable to participate in staff training for counselors but did go to the zipline training.

I interviewed assistant director, SM2 at the camp. SM2 stated this is her first year as the assistant director. SM2 stated she was near the slip-n-slide and noticed a smell. She asked staff to confirm there was a smell and they did. SM2 then, not wanting to embarrass Camper A, asked SM1 to confirm with Camper A if he had an accident. SM2 stated she then went to the lodge to get a plastic bag for his dirty shorts. SM2 stated she came back out to find out that SM1 sprayed Camper A with hose because he had feces down his legs. SM2 stated lots of kids where around by the slip-n-slide because the activity was going on. SM2 stated she called mother to report that Camper A had soiled himself and would need to be picked up from camp. SM2 reported Camper A had soiled himself earlier in the summer and had been picked up once before.

I reviewed a written statement by camp counselor, SM4. The written statement was provided to the camp administration for an internal investigation of the incident. SM4's written statement read "*Camper A didn't want to wear his swim suit since he was already wet from the mister. The other kids went to change in the bathrooms, but Camper A got on the slide right away because he didn't need to change. Sometime passed and SM2 camp up to me and asked if I could tell if Camper A had an accident. I went to him I could not tell if he did or not. SM5 was there as well with me and SM2, I said to them 'I'm not sure how to ask if he had an accident with out being rude' So SM5 went over to him and asked, Camper A said he did have one. Me and Camper A went to the Barn to get his swimsuit (a swim shirt and shorts) while SM2 watched my kids. I took him back to the Lodge/Bathrooms to change. I waited for him at the lodge port. SM1 came back to me with Camper A. He stated*

that Camper A was hosed down. I'm not sure where this was I am assuming the bathroom areas since he wasn't where I was (the front of the lodge)".

On 8/14/24, I reviewed e-mail correspondence from MDHHS MIC/PCU intake unit about the centralized intake complaint that was transferred. The e-mail read the complaint was not assigned for investigation because there does not appear to be allegations of abuse.

On 8/15/24, I reviewed e-mail correspondence between, associate executive director Krista Beyer and Parent 1A. The e-mail was dated 6/25 and read "*In regards today, we do have a policy regarding diarrhea. While it sounds like that is not the case, children in our camp must be fully potty trained. I am okay with him coming back tomorrow, but due to the extent of the accident today, if it continues to be an issue, then I will recommend that our camp is not the best option for him until he is fully potty trained*."

I reviewed e-mail correspondence from Parent 1A to camp director Ms. Cronk. The e-mail dated 6/24 read "*Camper A had an accident today at camp and the one lady informed me he couldn't come back tomorrow. Camper A is under a doctor's orders to take medication to soften his stools. He had an accident because he doesn't like to stop playing to use the bathroom, which I put on his health form that we are dealing with. He does not have diarrhea; he is not potty trained. Can you clarify how being potty trained keeps him from coming tomorrow*."

I reviewed additional e-mail correspondence dated 8/3 between Ms. Beyer and Parent 1A. The e-mails involved concerns identified by Parent 1A about the spraying incident. Parent 1A wrote "*My assumption was that as a mandated reporter this "investigation" would involve CPS. At the very least this is NEGLECT- your employee had my son naked behind a shed by themselves. If you are not able to follow through appropriately I can get the ball rolling on my end*." Ms. Beyer responded writing "*we did an internal investigation and multiple staff witnessed the event and there was no inappropriate actions taken on her son. Based on speaking with staff, he was wearing his swimsuit the entire time and sprayed down just his legs."* Parent 1A responded in writing "*my concerns are that his story has never changed. He was naked, hosed off then allowed to change into his swimsuit. I get your team wants to circle the wagons but you have hundreds of kids under care. I can't ignore this. I believe my son."*

On 8/15/24, I interviewed Parent 1A by telephone. Parent1A stated she would never send him back to the camp. Parent1A stated she was texted to pick up her son from the camp. She stated it appeared the camp was flustered with the soiling incident and treated it like it was an emergency. Parent1A stated when she arrived, Camper A came to her wearing his bathing suit and carrying his stuff and shoes. Parent 1A stated the staff accompanied Camper A and stated they had to clean the slip-n-slide because of the accident. Parent1A stated they "weren't being kind to him." Parent 1A stated she asked Camper A why he was wearing his bathing suit and he stated he

was wearing his other clothes on the slip-n-slide. He also stated he had been hosed off and then he put his swimsuit on. Parent1A stated Camper A had said no other counselors or kids were around when he was sprayed. She said Camper A had to cover his genitals with beach towel and had no other clothes. Parent1A stated Camper A conveyed the same story to his private counselor. Parent1A stated she had filled out health form information the first week of camp and has a letter from a doctor about the loose stool. She stated she did not submit the letter to the camp but had sent an email about the medication that causes loose stool. Parent1A stated Camper A does not take medication at the camp. He does need reminders to use the bathroom.

I reviewed Camper A's health form. The health form corroborated Parent 1A's statements. The health form includes questions about any special health, emotional, or behavioral considerations. The form indicated "yes" and included specific directions about use of the bathroom to prevent "accidents during the day."

I reviewed the behavior management policy located in the *2024 YMCA Camp Staff Handbook*. The Behavior Management Policy on page 9 reads in part "*The goal of our camp programs is to provide an atmosphere that is conducive to a variety of satisfying skills and relationships while allowing children to enjoy healthy activities*." The policy also reads "*In any situation, campers will not be deprived of food or sleep; shall not be alone without staff supervision, observation, and interaction; and shall not be subjected to hazing, ridicule, threat, corporal punishment, excessive physical exercise, or excessive restraint."* On page.13 of the staff handbook, under the section titled "Procedures for Daily Observation of Each Camper's Physical State", the policy reads "Throughout each day, the camper's counselor(s) and other attending camp staff observe the camper's physical state and behaviors. Observation means that at any point of time campers are within sight or sound of an adult staff member responsible for direct supervision. Observation includes preventative procedures which encompass some of the following: "*adult staff member responsible for director observation understand the camper's physical limitations and special health and behavioral considerations*." In addition, the policy included the statement "*observation also includes responsive procedures which encompass some of the following: reporting incidents to appropriate agencies (CPS, law enforcement, state licensing) and parents/guardians while maintaining confidentiality*."

I reviewed the 2024 YMCA Day Camp Parent Handbook. On page 1, within the welcome information, the handbook reads "*Staff are trained to demonstrate and encourage the values of honesty, caring, respect, and responsibility throughout the daily activities and games of the camp curriculum*." Within the section titled "registration and payment requirements" on page 2 it reads "Campers must be fully toilet trained."

APPLICABLE RULE	
R 400.11113	**Behavior management.**
	(1) A camp shall have and follow a written camper behavior management policy.
ANALYSIS:	Interviews, records, and observations reveal the camp has and followed a behavior management policy. There is no evidence the camp staff ridiculed Camper A. The staff response to the accident did not rise to an intentional act of ridicule. The camp is compliant with this rule.
CONCLUSION:	**VIOLATION NOT ESTABLISHED**

ADDITIONAL FINDINGS

I interviewed SM1 regarding his training during the summer 2024 season. SM1 stated he did not attend the regular staff training.

I reviewed the staff training schedule. The staff training schedule revealed a staff training was conducted on the week of June 3, 2024. The training agendas included a full-day of training on Monday, June 3, and site-specific training on 6/4-6/6/24 from 4:30-8:00pm. The training content online modules and in-person training modalities. The online training included bloodborne pathogen, preventing child sexual abuse, slip, trip, and fall training program; and First Aid/CPR online course. The in-person training included “developmental needs of the population served, responsibilities and procedures for acceptable techniques of camper supervision; responsibilities and procedures for camper behavior management.” In addition, the training schedule included a session titled “Camper Health; Intro to Emergency Response” covering topics such as: responsibilities and procedures within the health services policy; responsibilities and procedures within the response to emergencies and disasters plan and general site safety and sanitary condition.”

I reviewed the camp program application submitted on 4/19/24. The application lists the operating schedule dates from 6/10/24 through 8/16/24 equating to 10 weeks of service. The overall staff training time required by the camp administrative rules for 10 week of service is 30 hours of staff training.

On 10/15/24, I interviewed associate Executive Director, Krista Beyer about SM1 training verification. Ms. Beyer stated SM1 did not attend the summer 2024 training and the camp did not provide on-board training because he was a returning staff member from the year before. She stated there is no in-service training programs throughout the summer. Ms. Beyer stated the camp does not have a well thought-out plan for training for staff who are late hires or can not attend regular training days. Ms. Beyer stated it is on her plan to develop this aspect of the training program before next summer. Ms. Beyer stated staff training records are generally

maintained by online module records of completion, sign-in sheets, and pay records. Ms. Beyer provided a spreadsheet outlining the total pre-service training time from including the online modules and in-person training was 31.5 hours for 2024.

R 400.11109	**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.
ANALYSIS	Interviews and record review the camp has a staff training plan that includes the required content and meets the required timelines. However, SM1 training time did not meet the minimum required training time for staff members. SM1 attested that he did not attend the staff training for camp staff at the beginning of the summer. The camp did not comply with staff training requirements.
CONCLUSION:	**VIOLATION ESTABLISHED**

On 10/15/2024, I conducted an exit conference by telephone call with Ms. Beyer. I reviewed the findings of this report. Ms. Beyer stated she understood the findings and will be submitting a written corrective action plan within the timelines established.

IV. RECOMMENDATION

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

James VandenHeuvel 10/15/24

James P. VandenHeuvel Date
Licensing Consultant

Approved By:

Richard Lower 10/18/2024

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