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Revised 06/13/2018

Program Abuse Prevention Plan

I-78-F

Program:	ProAct Red Wing
Address:	204 Mississippi Ave
	Red Wing, MN 55066
Date plan developed:	(Revised)11/21/2017

This document is a description of the Program Abuse Prevention Plan for the Red Wing Site effective January 1, 2018

Maltreatment of Minors/Vulnerable Adult Maltreatment Policy/Procedure

For reporting incidents of Vulnerable Minor or Adult Maltreatment can be found in the

I-78PP Policy and Procedures Manual (Eagan/Red Wing/Zumbrota/Hudson)

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Day Training and Habilitation – Program Abuse Prevention Plan

The persons served by the DTH are considered to be Vulnerable Minors and Adults as defined by the consolidated standards - Minnesota Rules, under section 626.556 (maltreatment of minors) and 626.557 (vulnerable adults) and are susceptible to maltreatment. It is ProAct policy to:

- A. Report maltreatment of minors or vulnerable adults
- B. Provide a Program Abuse Prevention Plan
- C. Provide an Individual Abuse Prevention Plan for each person served.
- D. Provide training and information about the Maltreatment of Minors/Vulnerable Adult

Act to each person served or to their legal representatives.

ProAct, Inc. staff members continue to use checklists in all building areas and for all participants at transport times.

During this period the directors, programs & services and appropriate staff members completed periodic reviews of all incident reports at the Red Wing site. Annually, those incident reports are analyzed for trends, actions needed and/or staff training needed.

Red Wing Satellite Site: At the Red Wing Satellite site in Zumbrota, there are five or fewer individuals (usually 1-4) served daily who have expressed a preference to interact/visit the Zumbrota satellite site. The existing building housing the Zumbrota DT&H is adequately sized to accommodate current program services. These are individuals who may reside in the local area of Zumbrota, Wanamingo & surrounding rural areas, and who currently are served at the Red Wing DT&H location. Frequent outings, volunteering, classes and enrichment activities incorporate preferred options for all individuals. There are primary service spaces for the satellite group. Within the satellite group, individuals who are at risk for becoming upset by activity, change or noise, or who are having difficult periods, may be moved to a quiet area to listen to music or to use other methods to relax depending on individual program plans. Safety procedures continue to be reviewed at time of hire and annually thereafter with staff members. Cases of repeated incidents involving the same individual(s) are referred to the appropriate Designated Coordinator for further analysis and discussion with the individual teams.

A report of suspected maltreatment shall be reported and investigated. The reporter shall follow the procedure outlined, in policy and procedures Manual (I-78PP). This report can be made directly to the MAARC or internally and is then dealt with as per the Maltreatment of Minors/Vulnerable Adults Act procedures (When appropriate, verbal report to the MAARC with documentation in ProAct, Inc. records using the R-107). Suspected maltreatment of minors should be reported to the local social services or police department. Reports of serious injury, individuals for whom the ambulance is called with potential or suspected head injury, or attempted suicides require reporting within 24 hours of knowledge to the Ombudsman and to DHS licensing. An internal investigation is also required in these situations.

The program maltreatment prevention plan, and the individual abuse prevention plans, are developed to protect persons served, train staff members, and orient team members to the prevention of self abuse, financial exploitation, physical abuse, neglect, serious illness/injury, fires, elopement, suicide attempts, humiliation, retaliation and persistent emotional or psychological abuse of persons served, as well as to train all persons on the rights and responsibilities of persons served and mandated reporters as they pertain to the MAARC reporting system.

Annually, there is a review of incidents, injuries, accidents, and medication errors. In 2017, there was one report to the MAARC of an individual for whom the ambulance was called. An investigation followed this incident. There were no medication errors. There was an incident where four individuals living at the same home were dropped off by the bus driver and no staff member was present. This incident was reported and investigated and the driver was retrained.

The program maltreatment prevention plan, and the individual abuse prevention plans, are developed to protect persons served, train staff members, and orient team members to the prevention of self abuse, financial exploitation, physical abuse, neglect, serious illness/injury, fires, elopement, suicide attempts, humiliation, retaliation and persistent emotional or psychological abuse of persons served, as well as to train all persons on the rights and responsibilities of persons served and mandated reporters as they pertain to the MAARC reporting system.

A DTH self assessment/Individual Abuse Prevention Plan/CSSP Addendum is written with each person. This plan is based on the person's preferences along with an assessment of vulnerability and combined with the facility plan. The assessment will include information regarding any history of previous abuse by/to the person. The information is reviewed at least semiannually along with any incident reports which have been filed or any changes which have occurred in the person's life which would indicate a change in the plan is needed. Each new person is assessed as to his/her vulnerability and changes are made to the CSSP Addendum as needed. Thereafter, an assessment of vulnerability and new plan are done at the time of the Annual Review for the person or as needed.

Program staff participate in training for dealing with difficult behaviors and medical emergencies, with individual plans, and to learn positive reinforcement techniques. ProAct, Inc., as individual needs arise, will use consultants. Assessment documents are used to assist staff in understanding a variety of behaviors presented by persons served.

New staff members are oriented to the revised Maltreatment of Minors/Vulnerable Adults Act, to reporting procedures and to the ProAct, Inc. Vulnerable Minors and Adults/Maltreatment Prevention Policy and Procedures Manual (I-78PP) or the General Policy & Procedure Manual. Designated Coordinators along with the IDT, develop the Individual Abuse prevention Plans and train other staff working with persons served. Specialized training/staff assistance is provided to persons served in the areas of communication, visual skills, behavior management, activities of daily living, safety, motor development, social skills, and transportation. This list is not totally inclusive, since training/staff assistance is provided to any person on an individual basis or in small groups, as areas of vulnerability arise or when it appears that specialized instruction is indicated. The manner in which instruction is provided depends on the person's best mode of learning; training is provided individually and in small groups on procedures to follow, reporting, and appropriate methods of self-protection, when the person is able to benefit from such instruction.

Otherwise, staff will be trained to be sensitive to, and aware of individual needs. The consulting Goodhue County Public Health Nurse, Vicki Iocco, provides supervision of medication administration staff at both sites. The personal physician for each individual is consulted as needed either by the PHN or a ProAct staff member.

If persons served have needs for occupational or physical therapy, requests would be made to the IDT for consideration; therapies are either provided on-site or arranged for approved persons when prescribed by a physician. Otherwise, activities arranged by ProAct, Inc.'s DSP's or other staff are available as desired by IDT request. Sensory integration or therapy follow-through techniques are

implemented with individuals who appear to benefit from such techniques, recommended by the IDT, or when prescribed by a health professional.

ASSESSMENT OF THE POPULATION

RED WING SITE

The ProAct, Inc.-245D program serves men and women who are Minnesota residents aged 18 and older. Intellectual capacities range from mildly to profoundly developmentally disabled. Physical functioning and abilities range from normal physical condition to significant dependence on others for activities of daily living. Disabilities of persons served may range from visual impairments, hearing deficits, epilepsy, non-ambulation, and sensory/motor problems which affect coordination, movement, communications, and ability to understand one's surroundings. Behaviors observed may include aggression, wandering/running away, and self abuse, many kinds of attention getting and disruptive behaviors, and non-compliance with program activities. This group includes persons with cognitive impairments and several persons who need programming at a 1:1 staffing level for portions of each day. During the fiscal year, there were 126 total persons who received services under the DTH license. There were 8 new admissions and 5 discharges.

RED WING SATELLITE SITE

The Red Wing Satellite DT&H at Zumbrota has a license capacity of 12 persons. This group consists of participating individuals from the Red Wing DT&H site who may reside in the Zumbrota & Wanamingo areas, or may reside in other locations, including Wisconsin. This will be a mixed group of full-time and part-time individuals including men and women of ages ranging from transition students to retirement age.

Outings, center-based work training, classes, and activities of interest are offered. Mental capabilities range from mildly to significantly impaired. Physical functioning and abilities range from full physical ability to dependence upon others for activities of daily living (transferring and hand-over-hand instruction). Participant behavior programs include assistance with managing a variety of issues such as aggression (verbal/physical), property destruction, and elopement, various attention getting and disruptive behaviors and noncompliance with program activities. There are individuals who utilize wheelchairs, walkers and canes.

Program staff participate in a minimum of 40 hours of extensive orientation & training upon hire as well as annual retraining of 24 hours for those employed less than five years or 12 hours for those employed more than five years. In addition, there are ongoing sessions for dealing with problem behaviors, as well as appropriate and effective reinforcement techniques. The program has access to a nurse consultant and behavior training expertise as well as staff to assist with personal care. Identified program individuals' needs are addressed in their individual program plans as well as in their abuse prevention plans.

IN SUMMARY

Red Wing has seven persons in wheelchairs and three persons with disabilities that limit their ability to move away from an aggressor and who must be assisted by staff. Their individual plans address specific ways to protect each one from harm or injury.

Red Wing has 12 persons who have been aggressive to others in the past, or have the potential to become aggressive.

Many persons in Red Wing may at times become aggressive to others and are vulnerable to abuse from others. Both the program abuse prevention plan and the individual abuse prevention plans detail methods for preventing and/or coping with such behaviors at all sites. Staff members are trained to use intervention strategies for behavior management as needed, according to individual plans, before they begin to work with persons served, annually, and as needed. ProAct, Inc. offers Crisis Prevention Institute (CPI) training to staff members.

Staffing is provided according to the needs addressed in the CSSP Addendum for each participant. Individuals receiving services in the satellite setting receive services according to their individual ratios, generally 1:4 or 1:6. The Zumbrota Clinic is only a few minutes away for medical emergencies. The Goodhue County Public Health Nurse consultant visits as arranged, is on-call, provides overall supervision, assists with problem-solving, and reviews policies. The President and Director, Programs & Services visit as needed to deal with staff, services, and training issues. The Site Manager and/or other Zumbrota staff attend trainings, meetings and participate in other functions at ProAct-Red Wing.

ALTERNATE SITES

Persons are served in Red Wing and the Zumbrota site on a regular basis for classes, a base for community integration activities, and work training. Weather, health problems or other individual needs may mean that an alternate site will be used. Each person served chooses a combination of activities for this day.

Staff Supervision/Ratio Requirements

Services are staffed to allow for adequate supervision of all involved program individuals and to meet the individual's staff ratio as determined by the following criteria:

245D subdivision 4; ONE TO FOUR RATIO (1:4):

Requirements are that a person must have one or more of the characteristics described in the following two items :

1. On a daily basis the person requires total care and monitoring or constant hand-over-hand physical guidance to successfully complete at least three of the following activities: toileting, communicating basic needs, eating or ambulating.
2. The person engages in conduct that poses an imminent risk of physical harm to self or others at a documented level of frequency, intensity or duration requiring frequent daily ongoing intervention and monitoring as established in the person's coordinated service and support plan or coordinated service and support plan addendum.

245D subdivision 5; ONE TO EIGHT RATIO (1:8):

Requirements are that a person must have all of the characteristics described in the following two items:

- A. The person does not meet the requirements for a one- to-four ratio.
- B. On a daily basis the person requires verbal prompts or spot checks and minimal or no physical assistance to successfully complete at least three of the following activities: toileting, communicating basic needs, eating or ambulating.

245D.31 subdivision 6; A person who does not have any of the characteristics described in subdivision 4 or 5 must be assigned a staff ratio of one to six.

ONE TO ONE RATIO:

DT&H Program services offered consist of the following:

- Vocational services - facility and community based
- Community integration/independent living skills
- Self-care training
- Community orientation training
- Mobility training
- Social and communication skills training
- Safety practices training
- Vocational skills training
- Specialized therapies/consultation
- Home bound services

PLAN REVIEW

The DT&H Vulnerable Minor and Adult/Maltreatment Prevention Plan is reviewed annually by the Director, Programs & Services and the Board of Directors. Reports of abuse, neglect, exploitation or changes in the population, physical plant, or environment or trends gleaned from incident reports will be used to make any revisions to the plan.

PLAN ORIENTATION FOR PERSONS SERVED

Each person served or his/her representative will be oriented to the 245D Vulnerable Minor or Adult/Maltreatment Prevention Plan within 24 hours of admission to the program or within 72 hours if that delay would benefit the person served, and will also be reviewed annually.

PLAN DISTRIBUTION

A copy of the plan will be posted in the 245D service areas and a copy will be available to the applicant or representative at the time of admission, annual review, and upon request at anytime. The date of last review will be indicated on the plan.

**RED WING
EMPLOYMENT TRAINING SERVICES**

Persons served with employment training services, prevocational type, are considered to be Vulnerable Adults.

It is the policy of ProAct, Inc. to:

Report maltreatment of vulnerable adults

Provide a Program Abuse Prevention Plan

Provide, as needed and where appropriate, assistance in developing a plan of support to deal with identified vulnerabilities.

Provide training and information about abuse/protection to each person served or to their legal representatives.

A report of suspected maltreatment shall be reported and investigated. The reporter shall follow the procedure outlined in Policy and Procedures Manual (I-78PP). This report is then dealt with as per the Vulnerable Adults Act procedures (When appropriate, verbal report to the MAARC).

The facility vulnerable adult maltreatment prevention plan is reviewed and revised as needed by program staff. Incident reports will be summarized annually by the director, programs & services, and the results analyzed by the safety committee.

Each person served will be advised on admission, of ProAct, Inc.'s vulnerable adult maltreatment prevention plan, and instructed to report any maltreatment. Annual training will be offered that pertains to personal safety, reporting of maltreatment, maltreatment of minors and vulnerable adult law, and/or suggestions for dealing with difficult persons.

This information will be posted on the break room bulletin board, and a copy will be available to the applicant at the time of admission, annual review, and upon request at any time. The date of last review will be indicated on the plan.

For the period January 1, 2017 to December 15, 2017, there were no reports of possible maltreatment of a vulnerable adult served in Employment Training Services at ProAct – Red Wing. There were 64 individuals funded through the CADI/TBI waiver served in the Employment Training program. ProAct, Inc. staff members continue to use checklists in all building areas and for all participants at transport times. During this period the director, programs & services and appropriate staff members completed an annual review of all incident reports. Safety procedures continue to be reviewed at time of hire and annually thereafter with staff members. Cases of repeated incidents involving the same individual(s) are referred to the appropriate Designated Coordinator for further analysis and discussion with the individual teams.

A report of suspected maltreatment shall be reported and investigated. The reporter shall follow the procedure outlined, in policy and procedures Manual (I-78PP). This report is then dealt with as per the Vulnerable Adults Act procedures (When appropriate, verbal report to MAARC with documentation in ProAct, Inc. records using the R-107).

The program abuse prevention plan, and as needed, the individual abuse prevention plans, are developed to protect persons served, train staff members, and orient team members to the prevention of self abuse, financial exploitation, physical abuse, neglect, fires, serious injury/illness, suicide attempts, humiliation, retaliation and persistent emotional or psychological abuse of persons served, as well as to train all persons on the rights and responsibilities of persons served and mandated reporters as they pertain to the MAARC reporting system.

A Self- Assessment/Individual Abuse Prevention Plan/CSSP Addendum is written for each person. This plan is based on an assessment of vulnerability and combined with the facility plan. The assessment will include information regarding any history of previous abuse by/to the person. The Individual Plan is

reviewed semi-annually along with any incident reports which have been filed or any changes which have occurred in the person's life which would indicate a change in the plan is needed. Each new person is assessed as to his/her vulnerability and a new plan may be written. Thereafter, an assessment of vulnerability and new plan are done at the time of the Annual Review for the person. (R-118)

Program staff participate in initial/ongoing training for dealing with difficult behaviors, medical emergencies, individual plans, & appropriate positive reinforcement techniques. New staff members are oriented to the revised Vulnerable Adults Act, to reporting procedures and to the ProAct, Inc. Program Abuse Prevention Policy and Procedures Manual (I-78PP). ProAct Designated Coordinators team with the IDT, develop the Individual Abuse Prevention Plans and train other staff working with persons served. Specialized training/staff assistance is provided to persons served in the areas of communication, visual skills, behavior management, activities of daily living, safety, motor development, social skills, and transportation. This list is not totally inclusive, since training/staff assistance is provided to any individual or in small groups, as areas of vulnerability arise. Instruction is provided depending on the person's best mode of learning; training is provided individually/in small groups on procedures to follow, reporting, and self-protection, as appropriate. Staff are trained to be sensitive to, and aware of individual needs.

The consulting Goodhue County Public Health nurse provides supervision of staff providing medication assistance. The personal physician for each individual served is consulted as needed by the PHN or a ProAct staff member. Persons served may have needs for occupational or physical therapy. Any therapies are provided on site or arranged for when prescribed by a physician. Otherwise, activities arranged by ProAct, Inc.'s staff utilizing follow-through techniques are implemented with individuals who appear to benefit from such techniques when prescribed by a health professional or recommended by the IDT.

ASSESSMENT OF THE POPULATION

ProAct, Inc. serves men and women who are Minnesota residents aged 18 and older. Intellectual capacities range from profoundly developmentally disabled to well above average. Physical functioning and abilities range from normal physical condition to some dependence on others for activities of daily living. Disabilities of persons served may range from visual impairments, mental illness, hearing deficits, epilepsy, non-ambulation, and sensory/motor problems which affect coordination, movement, communications, and ability to understand one's surroundings, and other conditions.

Behaviors observed may include wandering/running away, self abuse, attention getting and occasional non-compliance with program activities. Staff members are trained to use intervention strategies for behavior management as needed, according to individual plans, before they begin to work with persons served, annually, and as needed. ProAct-Red Wing offers Crisis Prevention Institute (CPI) training to staff members.

ASSESSMENT OF THE PHYSICAL PLANT

The ProAct-Red Wing plant is located in the Industrial Park, approximately five miles north of Red Wing. The building meets all fire and safety requirements. It is an integrated plant, employing production workers as well as adults with disabilities. Restrooms are fully accessible. All persons are oriented to moving to areas of safety or exit in case of emergency or fire. There are three electric doors providing egress from the break room that allow independence for those with ambulatory problems and two more (DTH workroom #1 bathroom) and (DTH lunchroom to conference room) for other needs. Any person subject to wandering remains under staff supervision throughout the entire day. Persons are supervised as needed when in areas of the building that are used by participants and staff of other programs, production workers, and visitors.

The fire door between the old & new sections of the building has an electric door opener. The fire bell warning system includes red flashing lights for hard of hearing/deaf persons.

There is an automatic pushbutton-operated door on the main entrance to the building, a lowered front counter in the reception area and a flashing red light warning system in the front office. The production floor includes a large classroom and small meeting room for ETS use, with enhanced heating and air conditioning. Off the consumer break room, there is a remodeled kitchen area where cooking/food classes are held.

ProAct-Red Wing has access to community work sites to provide both work services and community orientation services. Each work site is assessed by ProAct, Inc. staff members prior to beginning the job. Each person is then oriented to the work site and supervision is provided accordingly. Work sites and assignments are subject to change based on individual needs and responses to that environment.

ASSESSMENT OF THE ENVIRONMENT

The Work Services Center is located in an industrial setting. Truck traffic is routed to the back of the building. Adjacent companies are generally acquainted with ProAct-Red Wing clientele. ProAct-Red Wing has a covered shelter, picnic tables and an outdoor lawn area for breaks and lunch as desired. Persons receiving services who are inclined to wander off grounds are carefully monitored by staff, and appropriate action is taken to insure their safety according to their individual plans. Staff members supervise all breaks and pre-work time. Whenever areas of potential hazard to persons served or staff are reported, appropriate action will be taken within 24 hours to correct the problem. If more time is required, the hazard will be secured to prevent access by a vulnerable adult. All areas that are potentially hazardous to persons served have been secured in such a fashion as to remove the hazard. The appropriate doors are kept locked at all times and are posted with an "authorized personnel only" sign. All areas difficult to supervise are "off limits" to persons served.

PLAN REVIEW

The Vulnerable Adult/Minor Program Abuse Prevention Plan is reviewed annually by the Director, Programs & Services. Reports of abuse, neglect, financial or other exploitation, retaliation, humiliation, or changes in the population, physical plant, or environment or trends gleaned from incident/complaint reports will be used to make any revisions to the plan. ProAct implements policies that promote confidentiality of information, privacy, informed consent/refusal as appropriate, access to advocacy services, investigation of alleged infringement of rights, and adherence to standards of ethics where persons served are involved.

PROACT, INC.

STATUS OF REPORT OF SUSPECTED MALTREATMENT

CONFIDENTIAL

TO: _____ (mandated reporter)

FROM: _____

On _____, at _____ a report of suspected maltreatment was received from
(date) (time)

you. This report was (was not) forwarded to _____ on _____
(MAARC) (date)

for further evaluation and investigation of the suspected maltreatment.

If you are not satisfied with the action taken by this agency, you may choose to contact the

_____ directly.
(MAARC)

AS REQUIRED BY MINNESOTA STATUTES, SECTION 626.557, YOU ARE HEREBY NOTIFIED THAT THIS FACILITY MAY NOT PROHIBIT A MANDATED REPORTER FROM CHOOSING TO REPORT AN INCIDENT TO AN EXTERNAL AGENCY. THIS FACILITY MAY NOT TAKE RETALIATORY ACTION AGAINST ANY MANDATED REPORTER WHO REPORTS AN INCIDENT TO THE COMMON ENTRY POINT IN GOOD FAITH. (Minnesota Statutes, sections 626.557, subdivision 4a, paragraphs (c) and (d)).

NOTE: THIS FORM MUST BE PROCESSED WITHIN 24 HOURS.

POPULATION ASSESSMENT:

1. Age range of persons receiving services:
Our current population is persons 18 and older. Individuals in the upper age range could continue to be served in senior years depending on an analysis of the person and each situation.

2. How will the program reduce the potential of abuse and/or harm to people related to the age of people receiving services?

The persons served are treated as individuals and age is one factor to be taken into consideration. Staff members are trained on relevant factors and the appropriate type and amount of help to offer as needed. A young person could need some help exercising judgment in certain situations, or understanding the appropriate interactions with elders, and an older person may need some extra time to get from one place to another, with meals, in the bathroom and with ambulation, in some cases. The IAPP can detail specific areas in which staff members need to be trained.

3. Gender of persons receiving services:
Our population is currently male (58%) and/or female (42%),

4. How will the program reduce the potential of abuse and/or harm to people related to the gender of people receiving services?

Staff members are trained to understand that privacy and confidentiality are required to protect persons served. This applies to gender and sexuality as well. Information on individuals who are changing gender or who have certain preferences is protected by the Designated Coordinators and is not shared as per HIPAA rules. Advocacy services are available and external referrals will be made upon request or as needed. Staff members are trained to be objective and neutral with gender and other issues, and to respect the rights and dignity of all persons served. Individuals served who exhibit tendencies to disrespect others' preferences will be counseled and offered information to broaden one's perspective on such issues.

5. Describe the range of mental functioning of persons receiving services
Intellectual /cognitive disabilities: mild, moderate, severe, profound to well above average; pervasive developmental disability, Asperger's syndrome, autism spectrum disorders, seizures. Mental illness: schizophrenia, dysthymia, bi-polar disorder, anxiety, depression. Traumatic brain injury.

6. How will the program reduce the potential of abuse and/or harm to people related to the mental functioning of people receiving services?
ProAct provides specialized services for people with mental illness and works closely with other mental health team members. Staff members have extensive training and work closely with participants. There are additional requirements and documentation for individuals receiving these services. Counseling and attention to individualized needs are key factors. A monthly "core team" meeting of mental health professionals reviews individual's progress in this and other related programs.

7. Describe the range of physical and emotional health of people receiving services:
ProAct serves a group of people of whom approximately three-fourths have multiple disabilities (physical and/or emotional).
Physical functioning and abilities range from normal physical condition to significant dependence on others for activities of daily living. Disabilities of persons served may range from visual impairments, mental illness, hearing deficits, epilepsy, non-ambulation, and sensory/motor problems which affect coordination, movement, communications, and ability to understand one's surroundings, and other conditions. Red Wing has seven individuals in wheelchairs and a number of others whose disabilities limit their ability to move away from an aggressor and who must be assisted by staff members. Their individual plans address specific ways to protect each one from harm.
8. How will the program reduce the potential of abuse and/or harm to people related to the physical and emotional health of people receiving services served?
Through contracted services, assessments followed by therapy services are provided when ordered by a physician. Staff members are trained on information related to physical and emotional health and oriented as needed on specific information related to each person's needs, initially and as needs change or annually thereafter. New information on related subjects is integrated into staff training on a regular basis. Specific staff training is provided for individuals with specialized needs such as catheters, food management (Prader-Willi), individuals with obsessive/compulsive disorder, blindness, individuals in wheelchairs or individuals who are nonverbal.
9. Describe the range of adaptive/maladaptive behavior(s) of people receiving services:
Included in this population are individuals who are upset by changes in environment, routine, coworkers, schedules, rituals, classroom and/or work routines or schedules, medication, home, or roommate changes or disruptions, self-abuse, aggressive behavior toward co-workers, staff, or both; and power struggle or control issues that result in inappropriate behavior affecting others. Behaviors observed may include wandering/running away, attention getting and occasional non-compliance with program activities.
10. How will the program reduce the potential of abuse and/or harm to people related to the adaptive/maladaptive behavior(s) of the people receiving services served? Staff members are trained to use intervention strategies for behavior management as needed, according to individual plans, before they begin to work with persons served, annually, and as needed. ProAct-Red Wing offers Crisis Prevention Institute (CPI) training to staff members. Individual program plans are designed with positive supports to help increase adaptive behavior and decrease maladaptive behavior, and provide consistency through staff training among all staff working with the person served.
11. Describe the need for specialized programs of care for people receiving services:
Each person who participates in programming has individual needs, desires, goals and objectives related to health, general happiness and well-being, vocational dreams or goals, physical issues/needs requiring trained staff to appropriately assist with personal cares, lifting/transferring, medication monitoring or management, mental health management, wound care, behavior management, leisure activities, interpersonal and community interaction, and vocational, volunteer or craft pursuits.

12. How will the program reduce the potential of abuse and/or harm to people related to the need for specialized programs of care for people receiving services?
Staff orientation and training is provided initially, annually and as needs change for Individuals requiring specialized programs of care. In some situations, a nurse or family member may teach programs of care or monitor procedures so that the person served, particularly if non-verbal, receives the care as designed and so that it meets the needs of the person. Communication among the person served and team members could enhance the process so that specialized services are delivered in the most comfortable and efficient manner possible for the person.
13. Describe the need for specific staff training to meet individual service needs:
Staff members need to be trained not only on the knowledge needed to understand a range of disability conditions and behavior management techniques, but on the specific and individual needs of the persons they are working with, in order to properly assist with daily needs, activities, goals and objectives. Because most persons served have multiple disabilities, an understanding of the interaction between physical disabilities and mental health or cognitive issues is important for appropriate care and assistance for the whole person.
14. How will the program reduce the potential of abuse and/or harm to people related to the need for specific staff training designed to meet individual service needs?
Designated Coordinators supervise and communicate with direct service staff members when it comes to implementing programs and services. DSP's and job coaches are trained on a need to know basis with specific training designed to meet individual service needs. The individual plan and related goals and objectives are included in the training provided to staff members so that they understand and are able to assist persons served in their daily schedules and activities, which may include exercise, medication, work, community activities, volunteering, and/or personal care, meals, transportation or other needs. Staff members are trained in Crisis Prevention Institute techniques for appropriately defusing behaviors that hold the potential for abuse.
15. Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to people receiving services:
There are twelve individuals who have been abused, may be abusive to others, may be self-abusive or who have behavior issues. If a person with a history of sexual offenses is accepted for services, it is essential that staff members carefully follow the plan for services so as to minimize risk of harm to others. Each person served who has a history of being abused or abusing others needs to be carefully monitored and to have a clear plan of action for dealing with situations that may arise.
16. How will the program reduce the potential of abuse and/or harm to people related to the knowledge of previous abuse?
Research and experience have shown that individuals who have been abused frequently continue to display maladaptive behavior and may be fearful, anxious, disruptive and/or abusive to others. They may become aggressive in response to upsetting situations, the behavior of others, certain personalities, or staff who approach them in certain ways. The staff members receive orientation and training to general principles as well as specific individualized plans of care for persons served who have histories of abuse. Training is provided to staff members so that consistency among staff members and predictable responses based on a team-generated

plan will generally help to provide a secure environment. Staff training will be provided so that any incidents that could occur are dealt with according to the CSSP Addendum and so that individuals who have been abused are adequately protected from further abuse.

17. During the fiscal year, there were 126 total persons who received DTH services under the DD waiver, with 8 new admissions and 5 discharges.

64 total persons received services under the CADI waiver, ranging from day services to prevocational to supported employment services. In each case, training was provided to staff members so that their personal needs, wishes, safety and individual service plans were considered using person centered thinking as a base for assisting the individual to work on their goals.

PHYSICAL PLANT ASSESSMENT:

1. Describe the condition and design of the facility as it relates to safety for the people receiving services:

RED WING INDUSTRIAL PARK LOCATION:

The Red Wing facility is located in a section of ProAct - Red Wing plant in the Industrial Park, approximately five miles north of Red Wing. The building meets all fire and safety requirements. It is an integrated plant, employing production workers as well as adults with disabilities. Restrooms are fully accessible. All persons are oriented to moving to areas of safety or exit in case of emergency or fire. There are three electric doors providing egress from the break room that allow independence for those with ambulatory problems. Any person subject to wandering remains under staff supervision throughout the entire day. Persons are supervised as needed when in areas of the building shared with participants and staff of other programs, production workers, and visitors. Two additional automatic door openers have been installed in the men's and women's bathrooms adjacent to the lunchroom in the newer section of the building. The fire door between the old & new sections of the building and the exit door nearest the classrooms have electric door openers. The fire bell warning system includes red flashing lights for hard of hearing/deaf persons. The front office has a lowered, accessible front counter and an automatic opening door.

The facility has access to a number of community work sites to provide both work services and community orientation services. Each work site is assessed by ProAct, Inc. staff members prior to beginning the job. Each person is then oriented to the work site and supervision is provided according to established ratios combined with other factors. Work sites and assignments are subject to change based on individual needs and responses to that environment.

Persons needing a variety of life skills activities, daily personal care, or needing additional supervision due to vulnerabilities or health problems are served in appropriate areas of the building space. DTH services areas include a large conference room, a kitchen and dining area, five bathrooms, two work rooms, a life skills room, lounge, three offices, two sick/relaxation rooms, laundry facilities, lockers and computer nooks. The area is fully accessible with a large production area with two classrooms and a quiet room adjacent to the area.

Persons needing other types of programming would be served in other areas of the building, housing a breakroom, kitchen area, a shower room, bathrooms in four locations of the building, the workfloor, three conference rooms, a large classroom, designated coordinator offices, a job coach room, a janitorial standards measurement room, and an exercise room that is shared among all programs.



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Eagan, MN 55121
651-686-0405

204 Mississippi Ave.
Red Wing, MN 55066
651-388-7108

224 Main Street
Zumbrota, MN 55992
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1202 Beaudry Blvd
Hudson, WI 54016
715-410-4216

Revised 12/6/2017

PROGRAM ABUSE PREVENTION PLAN

I-78

2. How will the program reduce the potential of abuse and/or harm to people related to the condition and design of the facility in terms of safety for people receiving services?
There is an active safety committee that reviews all aspects of building and environmental safety, including accidents, transportation issues, weather conditions, barriers, emergency preparations and needs. Being CARF accredited, there is an extensive set of health & safety standards that must be met. Because the facility is divided into sections, and then into rooms, as well as a large workflow, staff members are assigned so that all areas of the building are covered. Any areas of the building that are off limits are posted and or secured in such a way that they are not accessible.
3. Describe any areas of the facility that are difficult to supervise:
The loading dock is an area that is not always supervised. Individuals in licensed programs are not allowed in that area without staff accompaniment and a specific reason for going there.
4. How will the program reduce the potential of abuse and/or harm to people related to the areas of the facility that are difficult to supervise?
Individuals served who are authorized to enter the loading dock area are trained on safety, and on their specific duties in that area. Staff members who work in the vicinity of the loading dock and see someone who may not be safe, or who doesn't belong there would ensure that the person would be safe and would call for an appropriate staff person or would escort the individual to his or her program area.

ENVIRONMENTAL ASSESSMENT:

1. Describe the location of the facility including information about the neighborhood and community that the facility is located:

The facility is located in an industrial setting. Truck traffic is routed to the back of the building. Adjacent companies are generally acquainted with ProAct-Red Wing clientele. ProAct-Red Wing has landscaped and fenced an outdoor lawn area behind the day services section of the building. This provides a secure outdoor access for breaks and recreational activities. The area contains flowers, raised beds for flowers and vegetables and accessible picnic tables as well as poly tables & chairs. There is a shelter to protect individuals from the sun that is fully accessible. There is a garden behind this area where vegetables and herbs are grown. Whenever individuals are working in the garden, there is a staff member working with them and supervising the activity, ensuring that individuals are safe and appropriately engaged. Persons receiving services who are inclined to wander off grounds are monitored by staff, and appropriate action is taken to ensure their safety. ProAct-Red Wing has an elopement policy which is implemented as needed. Staff members supervise all breaks and pre-work time. Whenever areas of potential hazard to persons served or staff are reported, appropriate action will be taken within 24 hours to correct the problem. If more time is required, the hazard will be secured to prevent access by a vulnerable adult.
2. How will the program reduce the potential of abuse and/or harm to people related to the location of the facility, including factors about the neighborhood and community?

When a person elopes or goes off grounds, a search is immediately begun. Unless individual protocols state otherwise, the police are called after an allotted time period to aid in the search. Occasionally, an individual will walk up the street and staff members will go after them and walk them back to the facility, explaining that safety is our first concern and that is why we have rules about not going off grounds. Our neighbors are acquainted with us and are extremely safety conscious. Our closest neighbor provides work to us and also employs some of our individuals in their facility and thus have been educated about the needs and abilities of individuals with disabilities that we serve.

3. Describe the type of grounds and terrain that surround the facility:
The facility is in the midst of an industrial park, surrounded by streets, other factories/businesses, grassy areas, trees, and parking lots. The city bus serves this area. However, in close proximity (i.e. a three mile radius) is a state-managed bike trail, more streets, highway 61, and marshy areas adjacent to the Mississippi River, as well as a small shopping center.
4. How will the program reduce the potential of abuse and/or harm to people related to the type of grounds and terrain that surround the facility?
Significant efforts take place to keep the ProAct parking lot and sidewalks clear of snow and ice or other hazards in inclement weather. When a new person to be served begins services, the person is oriented to all aspects of the facility, including the rules about staying in the building, going outside for breaks in nice weather only when accompanied by a staff person, or if able to go outside independently for breaks, then the person is trained to respect the boundaries of the property, and also safety rules. If the history of an individual includes possible elopement, then a plan is developed to keep that person safe, and that may include designating areas to search immediately, such as the bike trail for one individual who has eloped previously. When a search is necessary, there is a plan that is followed which includes searching the grounds of business and/or field or woods nearer to the river and at the same time searching toward the highway to prevent unsafe behavior near two potentially hazardous areas.
5. Describe the type of internal programming provided at the program:
Person-centered programming of an appropriate type is provided at the facility depending on the individual plans, ratios, whether employment services or day services are requested, the type of work available, the individual schedules of participants, the skill levels, amount of work available, whether individuals prefer community work, whether medication monitoring or management is needed, transportation schedules, and other factors, including behavior issues. Flexible programming related to work, work training, classes, abilities, interests, and other factors such as type of funding/rules shape internal programming.
6. How will the program reduce the potential of abuse and/or harm to people through the type of internal programming provided at the program?
Individual plans and funding rules guide the programming for each person. The potential for abuse or harm is reduced by having a suitable level of supervision available, by IAPP information which is provided to staff members as training to keep individuals safe, by doing assessments which help staff program appropriately for a person's needs, and by monitoring interactions and functioning to keep people safe.
7. Describe the program's staffing pattern:
There are 70 staff members, five of whom are part-time. The various programs provided in this facility and in the community are set up to appropriately staff services depending on the ratios prescribed in the individual plans; and areas of the building are also organized in such a fashion that individuals served are grouped so that they will be served by appropriately trained staff persons who are available in appropriate numbers to provide services. Individuals on the extended employment workforce needing minimal supervision to accomplish their assigned tasks are in a different program with a different ratio of supervisors to persons served. While each person served has a designated coordinator, individuals served in waived service programs may be closely supervised and receive a more intensive level of services, on the higher end of the spectrum of needs.

8. How will the program reduce the potential of abuse and/or harm to people through the program's staffing pattern?

A greater number of trained staff members are assigned to serve individuals with the highest level of need. Within that framework, there are certain individuals sensitive to noise, activity, certain other individuals, and they will have a different staffing pattern both for protection and for positive support. On the workforce, in community activities, persons served are given choices, because that helps to prevent stressful situations of unhappy people. Staff members are also cross-trained to be able to assist and/or fill in as needed to provide flexibility to the programs. Regular, ongoing training on disabilities prepares staff members to remain competent and to develop expertise on individual needs

EACH PROGRAM MUST ENSURE THAT:

- A. People receiving services are provided with an orientation to the program abuse prevention plan. This orientation must be within 24 hours of admission or within 72 hours for individuals who would benefit from a later orientation.
- B. The ProAct's governing body must review the program abuse prevention plan at least annually.
- C. A copy of the program abuse prevention plan is posted in prominent places in the facility and is available, upon request, to mandated reporters, people receiving services, and legal representatives.
- D. The plan includes a statement of measures that are taken to minimize the risk of abuse to the vulnerable adult(s) or when the need for additional measures is identified. This includes identifying referrals that are made when the vulnerable adult is susceptible to abuse outside the scope or control of ProAct Inc. A report of suspected maltreatment shall be reported and investigated. The reporter will follow the procedure outlined, in policy and procedures manual (I-78PP). This report can be made directly to the MAARC or internally and is then dealt with as per the Maltreatment of Minors/Vulnerable Adults Act procedures (When appropriate, verbal report to the MAARC with documentation in ProAct, Inc. records using the R-107). Suspected maltreatment of minors should be reported to the local social services or police department. Reports of serious injury, individuals for whom the ambulance is called due to potential or suspected head injury,, or attempted suicides require reporting within 24 hours of knowledge to the Ombudsman and to DHS licensing. An internal investigation is also performed in these situations.
- E. If the assessment indicates that the vulnerable adult does not need specific risk reduction measures in addition to those identified in the program abuse prevention plan, the individual abuse prevention plan does document this determination.

