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Revised 12/19/25

## Program Abuse Prevention Plan

**ProAct Eagan**  
**3195 Neil Armstrong Blvd**  
**Eagan, MN 55121**  
**2026**

### **POPULATION ASSESSMENT:**

- Age range of persons receiving services:**  
Our current population is persons 16 to 79.
- How will ProAct reduce the potential of abuse and/or harm to people related to the age of people receiving services?**

All participants are treated respectfully, and each participant is individually served which includes consideration of age. Staff members are trained on appropriate types and levels of help to offer as needed. Staff receive training on ProAct's Program Abuse Prevention Plan, Maltreatment of Minors and Maltreatment of Vulnerable Adults during orientation, within 72 hours of providing direct service and on an annual basis. Training will also be provided as situations arise where retraining is necessary. Training will be provided on each person's Individual Abuse Prevention Plan, Support Plan Addendum and Self-Management Assessment.

- Gender of persons receiving services:**  
Our population is currently male (53%) and/or female (43%), other/unknown (4%).
- How will ProAct 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 participants. This applies to gender and sexuality as well. Information on individuals who are changing gender or who have a gender preference other than birth gender is protected by all staff 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 participants. Participants who exhibit tendencies to disrespect others' preferences will be counseled and offered information to broaden their perspective on such issues. Staff will receive training on ProAct's Program Abuse Prevention Plan, Maltreatment of Minors and Maltreatment of Vulnerable Adults during orientation, within 72 hours of providing direct services and on an annual basis. Training will also be provided as situations arise where retraining is necessary. Training will be provided on each person's Individual Abuse Prevention Plan, Support Plan Addendum and Self-Management Assessment.

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, autism spectrum disorders, seizures. Mental illness: schizophrenia, dysthymia, bi-polar disorder, anxiety, depression, brain injury.
6. **How will ProAct reduce the potential of abuse and/or harm to people related to the mental functioning of people receiving services?**  
ProAct provides staff members with extensive training and techniques to work with participants. Staff receive training on ProAct's Program Abuse Prevention Plan, Maltreatment of Minors and Maltreatment of Vulnerable Adults during orientation, within 72 hours of providing direct services and on an annual basis. Training will also be provided as situations arise where retraining is necessary. Training will be provided on each person's Individual Abuse Prevention Plan, Support Plan Addendum and Self-Management Assessment.
7. **Describe the range of physical and emotional health of people receiving services:**  
Physical and emotional health range from normal physical condition to significant dependence on others for activities of daily living. Disabilities of participants 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.
8. **How will ProAct reduce the potential of abuse and/or harm to people related to the physical and emotional health of people receiving services served?**  
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 a feeding tube, food management (Prader-Willi), individuals with obsessive/compulsive disorder, blindness, and individuals in wheelchairs. Staff receive training on ProAct's Program Abuse Prevention Plan, Maltreatment of Minors and Maltreatment of Vulnerable Adults during orientation, within 72 hours of providing direct services and on an annual basis. Training will also be provided as situations arise where retraining is necessary. Training will be provided on each person's Individual Abuse Prevention Plan, Support Plan Addendum and Self-Management Assessment. Medication administration and medical treatments are provided by a Medical Assistant or med-certified staff.
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. Participants exhibit maladaptive behaviors including, but not limited to, explosive personality disorder, elopement, aggression to self, others and/or property, inappropriate sexual behaviors, and inaccurate reporting.
10. **How will ProAct reduce the potential of abuse and/or harm to people related to the adaptive/maladaptive behavior(s) of the people receiving services served?**  
Staff receive training on ProAct's Program Abuse Prevention Plan, Maltreatment of Minors and Maltreatment of Vulnerable Adults during orientation, within 72 hours of providing direct services and on an annual basis. Training will also be provided as situations arise where retraining is necessary. Training will be provided on each person's Individual Abuse Prevention Plan, Support Plan Addendum

and Self-Management Assessment. ProAct staff are trained on Positive Support Strategies and Person-Centered Thinking Practices and will use these skills while interacting with participants.

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 outcomes related to health, general happiness and well-being, vocational dreams or goals, etc. Staff will follow individual plans and 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 or volunteer pursuits among other things.
12. **How will ProAct reduce the potential of abuse and/or harm to people related to the need for specialized programs of care for people receiving services?**  
Staff receive training on ProAct's Program Abuse Prevention Plan, Maltreatment of Minors and Maltreatment of Vulnerable Adults during orientation, within 72 hours of providing direct services and on an annual basis. Training will also be provided as situations arise where retraining is necessary. Training will be provided on each person's Individual Abuse Prevention Plan, Support Plan Addendum and Self-Management Assessment as well as medical protocols and Person-Centered Plans.
13. **Describe the need for specific staff training to meet individual service needs:**  
Every participant is different, and all staff will be trained on each participant's plan. All programs hold frequent meetings to discuss changes in each individual's plan of care.  
Staff will receive training on ProAct's Program Abuse Prevention Plan, Maltreatment of Minors and Maltreatment of Vulnerable Adults during orientation, within 72 hours of providing direct contact and on an annual basis. Training will also be provided as situations arise where retraining is necessary. Training will be provided on each person's Individual Abuse Prevention Plan, Support Plan Addendum and Self-Management Assessment as well as medical protocols and Person-Centered Plans. All policies required by DHS and Rule 245D are reviewed during orientation, on an annual basis and as needed.
14. **How will ProAct reduce the potential of abuse and/or harm to people related to the need for specific staff training designed to meet individual service needs?**  
All programs hold frequent meetings to discuss changes in each individual's plan of care.  
Staff receive training on ProAct's Program Abuse Prevention Plan, Maltreatment of Minors and Maltreatment of Vulnerable Adults during orientation, within 72 hours of providing direct services and on an annual basis. Training will also be provided as situations arise where retraining is necessary. Training will be provided on each person's Individual Abuse Prevention Plan, Support Plan Addendum and Self-Management Assessment as well as medical protocols and Person-Centered Plans. All policies required by DHS and Rule 245D are reviewed during orientation, on an annual basis and as needed.
15. **Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to people receiving services:**  
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 to minimize risk of harm to others. Each participant 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 ProAct reduce the potential of abuse and/or harm to people related to the knowledge of previous abuse?**  
The staff members receive orientation and training to positive supports general principles as well as specific individualized plans of care for participants 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 is provided so that any incidents that could occur are dealt with according to the individual plan and so that individuals who have been abused are adequately protected from further abuse. Incidents of possible abuse are referred to the Minnesota Adult Abuse Reporting Center and ProAct holds an internal review of the incident.

#### **PHYSICAL PLANT ASSESSMENT:**

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

The Eagan facilities are located in an industrial park and the buildings meet all fire and safety requirements. The Eagan building was built in 1997. The building is maintained well and in good repair. Restrooms are fully accessible. All persons are oriented to moving to areas of safety or exit in case of emergency or fire. There are four electric doors providing egress from the front office, one installed in the hall entering the employment area, another off the patio from the cafeteria, and one at the West building side exterior door that allow independence for those with ambulatory problems. Persons are supervised as needed when in areas of the building shared with participants and staff of other programs, production workers, and visitors. The fire bell warning system includes red flashing lights for hard of hearing/deaf persons.

**2. How will ProAct 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 work floor, 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 where staff are working but not necessarily focused on supervision of the participants. Staff are monitoring hallways and other public spaces but again, not positioned in one specific area such as the restrooms. The buses are also difficult to supervise. The only staff member on the bus is the driver when going to and from residences. ProAct has very few routes, almost all of the transportation is through outside transportation (Metro Move, Metro Mobility)

**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?**

Participants are not authorized to enter the loading dock area or if they ever were, would be 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. Hall mirrors and cameras are in place to be able to see persons entering the bathrooms. On the buses, ProAct utilizes program staff to help oversee the individuals' actions when driving to and from outings. Bus drivers are provided training on individual behaviors and strategies to minimize harm.

#### **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 runs in front of the building. Adjacent companies are generally acquainted with ProAct-Eagan clientele. ProAct-Eagan has landscaped and fenced an outdoor Patio area outside the cafeteria. This provides a secure outdoor access for breaks. The area contains accessible picnic tables. There is a garden behind the building 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. Staff members supervise all breaks. Surrounding businesses typically will call ProAct-Eagan if they notice a vulnerable adult going up the street. Whenever areas of potential hazard to participants 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. ProAct -Eagan has traffic runs on the side and front of the buildings. Staff escort individuals across the lot between buildings, other individuals have documented in their Support Plan Addendum and/or their Self-Management Assessment they may walk unescorted.

**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 participant elopes or goes off grounds, a search is immediately begun. Our neighbors are acquainted with us and are extremely safety conscious. Access to multiple security cameras assist in elopement prevention and recovery. Staff will receive training on ProAct's Program Abuse Prevention Plan, Maltreatment of Minors and Maltreatment of Vulnerable Adults during orientation, within 72 hours of providing direct contact and on an annual basis. Training will also be provided as situations arise where retraining is necessary. Training will be provided on each person's Individual Abuse Prevention Plan, Support Plan Addendum and Self-Management Assessment as well as medical protocols and Person-Centered Plans.

**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. There are sidewalks going to and around ProAct, but there are no sidewalks on Neil Armstrong Blvd. ProAct has a large parking lot and landscaping (bushes, trees, grass) around the building. The city bus serves this area. Out of the immediate area are more residential areas including bike trails.

**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 are made to keep the ProAct parking lot and sidewalks clear of snow and ice or other hazards in inclement weather. When a participant begins services, the person is oriented to all aspects of the facility, including the rules about staying in the building 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. When a search is necessary, there is a plan that is followed which includes searching and reviewing camera footage, the grounds of business and at the same time searching toward the busy street of Lexington to prevent unsafe behavior potentially hazardous areas.

**5. Describe the type of internal programming provided at the program:**

ProAct offers a variety of enrichment and vocational options. The enrichment classes range from community outings to classroom work including cooking, computer, arts/crafts, etc. Employment options include assistance pursuing independent jobs as well as pre-vocational training. 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 and Support Plan Addendum information, and by monitoring interactions and functioning to keep people safe. Staff will receive training on ProAct's Program Abuse Prevention Plan, Maltreatment of Minors and Maltreatment of Vulnerable Adults during orientation, within 72 hours of providing direct services and on an annual basis. Training will also be provided as situations arise where retraining is necessary. Training will be provided on each person's Individual Abuse Prevention Plan, Support Plan Addendum and Self-Management Assessment as well as medical protocols and Person-Centered Plans.

**7. Describe the program's staffing pattern:**

There are 85 staff members at ProAct-Eagan. 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.

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

ProAct will ensure that the minimum staffing requirement based on need/funding is always maintained. Because ProAct is such a large facility, staff are able to move from one area to another when anyone is absent. If direct service staffing is not adequate to meet requirements and maintain safe conditions, Coordinators and Managers are available to provide care and supervision.

**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 does 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.
- 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.
- F. In addition to the Program Abuse Prevention Plan, an Individual Abuse Prevention Plan is developed for each new person receiving services. A review of the Individual Abuse Prevention Plan is done as part of the program plan. The participant participates in the development of the Individual Abuse Prevention Plan to the best of their abilities. All abuse (individual or program) prevention plans are reviewed at least annually by the interdisciplinary team.

Judie Foster-Lupkin

Print name and title

President & CEO

Date(s) of last plan review:

Signature

1/6/2026 Date

John Christiansen

Print name of Board Member

who reviewed this plan

Signature of Board Member

1/6/2026 Date

Legal Authority: Minn. Stat. 245A.65, subd. 2