



Program Abuse Prevention Plan

Date Plan Was Developed: July 27, 2026
Next Review Due: July 2027

Program Name:	PAI Oakdale
Program Abuse Prevention Plan Prepared By:	Kennedy Smith, Program Director
Name and Title of Designated Manager:	Kennedy Smith, Program Director
Approved Incident Reviewers [Name(s) and Title(s)]:	Kennedy Smith, Program Director Brendan Berry, Program Supervisor

Describe the plan for emergency contact and designation of authority when the Program Director is not present on site.

The most senior Program Supervisor will assume all supervisory responsibilities when the Program Director is not present. The Program Supervisor will connect with the Chief Operating Officer as needed. In the absence of the Program Director and Program Supervisors, the site Case Aide will assume supervisory responsibilities. In the absence of the Program Director, Program Supervisors, and the Site Case Aide, the most senior Direct Support Professional staff will assume supervisory responsibilities. When a Direct Support Professional is assuming responsibility for the program, they will be directly notified verbally or in writing.

This Program Abuse Prevention Plan (PAPP) is developed in accordance with Minnesota Statutes, section 245A.65, subdivision 2, and Minnesota Statutes, section 626.557, subdivision 14, to ensure the health and safety of vulnerable adults served by PAI. Participants receive a copy of the PAPP within 24 hours of admission (or 72 hours if delayed is appropriate).

Population Assessment:

1.	Age range of participants receiving services: 18 and older.
	Possible risks related to age of participants receiving services: Participants may be at increased risk of abuse, neglect, or financial exploitation due to age-related physical, cognitive, or social factors. These risks may include physical vulnerability resulting from decreased mobility, strength, balance, or other age-related health conditions that increase dependence on others for support; cognitive or memory changes that may affect a participant's ability to recognize, avoid, or report abuse, neglect, or exploitation; increased dependence on caregivers or staff for personal care, transportation,

	communication, medication management, or other activities of daily living, creating opportunities for misuse of power or neglect; social isolation or limited natural supports that reduce opportunities for others to observe or report concerns; limited understanding of personal rights, healthy boundaries, or what constitutes abuse, neglect, financial exploitation, or coercion; and increased vulnerability to financial exploitation, scams, manipulation, or undue influence. How will the program reduce the potential of abuse and/or harm to participants related to the age of the participant receiving services? Staff members are trained on the participant's Support Plan, Support Plan Addendum (SPA), Self-Management Assessment (SMA), Individual Abuse Prevention Plan (IAPP) and Behavior Support Plan (BSP), if applicable, for all participants at time of hire and, at minimum annually, thereafter. Per 245D.071, subd. 5, each participant's SPA, IAPP, and SMA are reviewed annually during a team review meeting. In addition to the annual review, a participant's SPA, IAPP, and SMA are reviewed and updated any time there is a significant change in the participant's needs, risk factors, or circumstances, so that supports remain current throughout the service year. Staff members will encourage age-appropriate interactions. All staff complete orientation and ongoing annual training per 245D.09, subd. 4, including maltreatment reporting, positive support strategies, safe environments, and individual-specific risk factors. Handrails are provided in main hallways, hallways are kept free of debris and spills, and sidewalks are kept free of snow and ice. If it is determined that additional support services are needed related to age, PAI will assess whether we are able to provide additional support. If unable, PAI will refer individuals for additional support and/or alternate programs better suited to their needs.
2.	Gender of participants receiving services: Male, Female, and Non-Binary; PAI Oakdale is offered equally to both genders. Possible risks related to gender of participants receiving services: Participants may experience an increased risk of abuse, harassment, sexual abuse, exploitation, bullying, discrimination, privacy violations, or inappropriate boundaries based on their gender or gender identity. Participants who require assistance with personal care or toileting may be at increased risk due to the need for close physical assistance. Some participants may also have difficulty recognizing inappropriate behavior, establishing personal boundaries, or reporting concerns. How will the program reduce the potential of abuse and/or harm to participants related to the gender of the participant receiving services? IAPPs and SPAs are created for participants prior to service initiation. In addition, the SMA is created within 60 days of service initiation. These documents help assess support needs including those related to gender. Per 245D.071, subd. 5, each participant's SPA, IAPP, and SMA are reviewed annually during a team review meeting. In addition to the annual review, a participant's SPA, IAPP, and SMA are reviewed and updated any time there is a significant change in the participant's needs, risk factors, or circumstances, so that supports remain current throughout the service year.

	If it is determined there are support needs related to gender, PAI will attempt to provide these supports either through existing programs or through the development of new programs. If unable, PAI will make referrals for the appropriate support. PAI Oakdale has gender-specific restrooms as well as non-gender specific restrooms. If participants of the same gender are provided support in the restroom at the same time, a privacy screen or curtain will be used. All staff members at PAI Oakdale receive annual training on Sexual Violence. All staff complete orientation and ongoing annual training per 245D.09, subd. 4, including maltreatment reporting, positive support strategies, safe environments, and individual-specific risk factors.
3.	Describe the range of mental functioning of participants receiving services: PAI supports participants with a wide range of mental functioning, including intellectual and developmental disabilities, persistent mental illness, and brain injuries. The mental functioning of the participants at PAI Oakdale ranges from moderate to profound intellectual disability. Possible risks related to the range of mental functioning of participants receiving services: Participants with varying levels of mental functioning may have difficulty understanding personal rights, recognizing abuse, neglect, exploitation, or manipulation, communicating concerns, making informed decisions, or advocating for themselves. Some participants may be more susceptible to coercion, financial exploitation, peer victimization, inappropriate relationships, or undue influence. Participants may also have limited awareness of personal boundaries or may require increased supervision to maintain their safety. How will the program reduce the potential of abuse and/or harm to participants related to the mental functioning of the participant receiving services? Each participant is assigned a Designated Coordinator, who is a staff member responsible for coordinating the various services that the participant receives. Staff members are trained on the specific strengths and needs of the people they support, and the requirements for service delivery. Per 245D.071, subd. 5, each participant's SPA, IAPP, and SMA are reviewed annually during a team review meeting. In addition to the annual review, a participant's SPA, IAPP, and SMA are reviewed and updated any time there is a significant change in the participant's needs, risk factors, or circumstances, so that supports remain current throughout the service year. Programming will be offered onsite for participants that address appropriate boundaries, social skills (including safe internet and phone use), self-advocacy, healthy relationships, and sexuality. Staff will model appropriate boundaries. If bullying situations arise, the Designated Coordinator will work with the individual and their team to address the concern. Participants will be encouraged to limit cell phone use to program break times in order to reduce the possibility of contact with malicious actors, with the added benefit of allowing for fuller engagement in program activities as well as peer and staff interactions. All individuals receiving services at PAI Oakdale are considered vulnerable adults. All staff complete orientation and ongoing annual training per 245D.09, subd. 4, including maltreatment reporting, positive support strategies, safe environments, and individual-specific risk factors.
4.	Describe the range of physical and emotional health of people receiving services:

	At PAI, we work with a wide array of individuals, each unique in their personalities, their strengths, and their physical/emotional health. Participants at Oakdale often have extensive and complex physical health needs. Due to physical support needs, the individuals may require the use of an adaptive aid such as a walker or wheelchair for mobility and require support with fine and gross motor tasks. Possible risks related to the range of physical and emotional health of participants receiving services: Participants with physical or emotional health needs may be at increased risk of abuse, neglect, or harm due to their reliance on others for mobility, personal care, communication, medication assistance, or emotional support. Physical limitations may make it difficult to avoid unsafe situations or report concerns. Emotional or mental health conditions may increase vulnerability to manipulation, coercion, intimidation, social isolation, or exploitation. Participants with complex medical or behavioral support needs may also be at greater risk if individualized supports are not consistently implemented. How will the program reduce the potential of abuse and/or harm to participants related to the physical and emotional health of the participant receiving services? Everyone served at PAI has an SPA, SMA, and IAPP on file that outlines any supports required to meet physical needs, including but not limited to; mobility concerns, fine-motor skills, and gross-motor skills. Staff members are trained in providing these physical supports. Per 245D.071, subd. 5, each participant's SPA, IAPP, and SMA are reviewed annually during a team review meeting. In addition to the annual review, a participant's SPA, IAPP, and SMA are reviewed and updated any time there is a significant change in the participant's needs, risk factors, or circumstances, so that supports remain current throughout the service year. If a participant has emotional health needs, the supports required will be in that individual's SPA, SMA, and IAPP. Staff members will assist in the administration of medications as needed. PAI provides training to staff in medication administration. All reasonable accommodations are made for participants regarding their disability. Handrails are provided in main hallways, hallways are kept free of debris and spills, and sidewalks are kept free of snow and ice.
5.	Describe the range of adaptive/maladaptive behavior(s) of participants receiving services: At PAI, we work with participants with a wide variety of adaptive/maladaptive behaviors such as verbal and/or physical aggression (ranging from mild to severe), property destruction, and self-injurious behaviors. Possible risks related to the range of adaptive/maladaptive behavior(s) of participants receiving services: Participants who display adaptive or maladaptive behaviors may be at increased risk of injury, peer conflict, social isolation, exploitation, or abuse if behaviors are misunderstood or not appropriately supported. Challenging behaviors may also increase the likelihood of unsafe interactions, inappropriate staff responses, or situations requiring emergency intervention. Participants who have difficulty communicating their needs or regulating emotions may be more vulnerable to coercion, neglect, or retaliation by others. How will the program reduce the potential of abuse and/or harm to participants related to the adaptive/maladaptive behavior(s) of the participants receiving services? Staff receive yearly training on de-escalation techniques, permitted actions, and our policy on EUMRs and when they can be used. Everyone served at PAI has an SPA, SMA, and IAPP on file that outlines any

	behavioral supports required. Per 245D.071, subd. 5, each participant's SPA, IAPP, and SMA are reviewed annually during a team review meeting . In addition to the annual review, a participant's SPA, IAPP, and SMA are reviewed and updated any time there is a significant change in the participant's needs, risk factors, or circumstances, so that supports remain current throughout the service year. At PAI, we have mental health/behavioral support professionals to whom we can refer individuals if needed. These professionals are uniquely trained to assess categories of adaptive/maladaptive behavior and offer positive support strategies for participants.
6.	Describe the need for specialized programs of care for participants receiving services: The participants supported at PAI may need a wide variety of specialized programs of care depending on their unique support needs. These programs may include behavior support, communication supports, lifts and transfers, support eating, medication administration and health-related support, and personal cares support. Possible risks related to the need for specialized programs of care for participants receiving services: Participants who require specialized programs of care may be at increased risk of abuse, neglect, injury, or exploitation due to their reliance on staff. Failure to consistently implement individualized supports may place participants at risk for unmet needs, accidents, medication errors, inadequate supervision, privacy violations, or inappropriate care. How will the program reduce the potential of abuse and/or harm to participants related to the need for specialized programs of care for the participants receiving services? The facility employs Direct Support Professionals whose primary responsibilities include ensuring that all participants are accounted for. Everyone's specific needs for supervision are outlined in their SPA, SMA, and IAPP. Per 245D.071, subd. 5, each participant's SPA, IAPP, and SMA are reviewed annually during a team review meeting and revised throughout the year as needed to reflect significant changes in the participant's needs, risk factors, or circumstances Staff members are trained in medication administration. PAI staff administer medications and implement prescribed treatment orders under the supervision of an RN consultant. Medication administration records are reviewed monthly by the designated coordinator and RN consultant. Staff are trained to follow prescribed diet orders, assist individuals with eating, and respond to choking emergencies. When an individual's Support Plan requires services to be provided by staff who are currently certified in CPR, PAI ensures those requirements are met. While CPR certification is not required for every staff position, PAI regularly provides CPR training and maintains CPR-certified staff to support participant needs. Hoyers, Arjos and ceiling lifts are available to assist participants in transferring for personal cares. Staff are trained on how to physically assist participants with personal cares. Participants are encouraged and supported in using preferred communication methods onsite. Staff will be trained in how to use communication devices utilized by individuals onsite and how to observe nonverbal communication indicators.
7.	Describe the need for specific staff training to meet individual service needs:

	Minnesota Statutes, Chapter 245D, requires specific and measurable training for staff members. Staff members are required to have specific amounts of education, training, and experience in order to hold designated positions at PAI. Possible risks related to the need for specific staff training: Without appropriate training, staff may be unable to safely implement individualized support plans, recognize signs of abuse or neglect, respond appropriately to behavioral or medical situations, maintain participant rights and dignity, or provide required supervision. Inadequate training may increase the risk of injury, neglect, medication errors, inappropriate interventions, or failure to meet participants' assessed needs. How will the program reduce the potential of abuse and/or harm to participants related to the need for specific staff training designed to meet individual service needs? Training is designed to ensure that staff members are competent through education, training, and experience to work with people with intellectual and developmental disabilities. In addition to required training, PAI has a Training Manager who will locate additional training resources as needed to support PAI's unique needs as an organization.
8.	Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to participants receiving services: There are no known incidents of substantiated abuse at PAI Oakdale. If there is suspected or substantiated maltreatment, PAI conducts internal reviews whenever there is a report of suspected maltreatment of vulnerable adults within our program. PAI also conducts internal reviews of incidents. Possible risks related to knowledge of previous abuse: Participants who have experienced previous abuse, neglect, exploitation, or trauma may be at an increased risk of future victimization. A history of abuse may affect a participant's ability to trust others, recognize abusive behavior, establish healthy boundaries, or report concerns. Without appropriate protective interventions, previous patterns of abuse or program-wide trends could increase the potential for future abuse, neglect, or harm. How will the program reduce the potential of abuse and/or harm to participants related to the knowledge of previous abuse? Internal reviews help PAI with program oversight. PAI can identify trends/patterns and take measures to respond to any identifiable tasks. PAI can also preemptively plan to reduce the potential for abuse and/or harm by systemically conducting internal reviews of all incidents on a regular basis. All staff members are trained on the "Reporting of Maltreatment of Vulnerable Adults Act" upon hire and annually thereafter.

Physical Plan Assessment:

1.	Describe the condition and design of the facility as it relates to the safety for the participants receiving services:
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	The facility contains five program spaces, restrooms, offices, breakroom, kitchen and laundry area, common area, conference room, and janitorial room. The program is a single-story facility. The facility has two doors that open to the outside; the front door is equipped with electric doors which open manually or can be held open. The rear door is kept locked to the outside during program hours. The facility is maintained in good repair and is structurally sound. Possible risks related to the condition and design of the facility: Participants may be at risk of injury or harm due to environmental hazards, emergency situations, community access points, or mobility challenges. Risks may include slips, trips, and falls; elopement or unauthorized entry; difficulties during emergency evacuations; injuries during participant loading and unloading; hazards associated with adaptive equipment; or barriers related to participants' physical, sensory, or cognitive disabilities. How will the program reduce the potential of abuse and/or harm to participants related to the condition and design of the facility in terms of safety for participants receiving services? The facility employs Direct Support Professional Staff whose primary responsibilities include ensuring that all participants are accounted for. The facility is professionally cleaned on a regular basis. Spills or obstacles are cleaned or removed promptly. The program hallways are equipped with railings and participant restroom areas are accessible. The emergency exits are equipped with alarms. The primary entrance of the program is supervised by a staff member during the program day and all visitors are required to sign-in. There are yellow lines painted on the parking lot to identify where vans should load and unload for the safety of participants. Some individuals may be assigned more support during times of transition as needed. PAI employs a maintenance worker who is available 3 days/week to address any maintenance concerns. Hoyers, Arjos and ceiling lifts are available to assist participants in moving from one location to another. Fire drills are held quarterly. Fire extinguishers are placed in multiple locations throughout the facility near each of the three main entrances and in the participant kitchen area. There is emergency lighting within the program, lighted exit signs, and primary and secondary escape routes posted in program rooms. Severe weather drills are held yearly.
2.	Describe any areas of the facility that are difficult to supervise: The supervision of restroom areas within the program may be difficult to supervise due to privacy of participants. The desk at the building's front entrance is typically staffed one day per week. There is one Program Supervisor employed at PAI Oakdale, whose office is in visual and auditory range of the front entrance. Possible risks related to areas of the facility that are difficult to supervise: Areas with limited direct supervision may increase the risk of abuse, neglect, exploitation, unauthorized access, elopement, peer-to-peer incidents, or medical emergencies going unnoticed. Privacy areas, such as restrooms, require a balance between participant dignity and appropriate supervision. How will the program reduce the potential of abuse and/or harm to participants related to the areas of the facility that are difficult to supervise?

	The facility employs Direct Support Professionals whose primary responsibilities include ensuring that all participants are accounted for. Staff have keys available for all bathrooms and can enter as concerns arise. Individuals who choose to use break areas are checked on according to their individual support plan and no less than every 15 minutes, unless more frequent supervision is required based on their assessed needs. Direct Support Professionals are in the hallways during transition times to monitor. The front doors remain unlocked during programming hours. A Ring camera and doorbell are installed outside the front entrance to assist staff in monitoring visitors and allowing visitors to request entry. On the front desk, there is a clearly labeled tablet that indicates all guests need to sign in and out. There is one Program Supervisor employed at PAI Oakdale, whose office is in auditory and visual range of the front entrance.
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Environmental Assessment:

1.	Describe the location of the facility including information about the neighborhood and community where the facility is located: PAI Oakdale is in a business complex in Oakdale, a metropolitan suburb. There are other businesses and industries nearby and frequent large truck traffic through the parking lot.
	Possible risks related to the location of the facility: The location of the facility may present risks related to vehicle traffic, pedestrian safety, community access, contact with unfamiliar individuals, elopement, getting lost, or exploitation while participating in community activities. Participants may also be at increased risk if they are unable to safely recognize hazards or independently navigate the surrounding community.
	How will the program reduce the potential abuse and/or harm to people related to the location of the facility, including factors about the neighborhood community? Each of the doors in the facility either has an alarm/bell that sounds when opened from the inside or outside. Staff members take attendance and assist other staff persons as needed in monitoring and supervising participants. Staff members are trained on the supervision requirements for participants.
2.	Describe the type of grounds and terrain that surround the facility: There are wooded and marsh areas to the East and south sides of PAI Oakdale. There are walking trails nearby and parking lots to the East and West of the facility. The facility is in a cul-de-sac and there are no sidewalks in the immediate area of the program. There is a large parking lot surrounding the business complex that PAI Oakdale resides in which is shared with other businesses.
	Possible risks related to the type of grounds and terrain that surround the facility: Participants may be at risk of slips, trips, falls, or injuries while navigating the shared parking lot, curb transitions, uneven pavement, walking trails, or natural terrain surrounding the facility, particularly during inclement weather. The wooded and marsh areas adjacent to the program may increase the risk of participants becoming lost, entering unsafe areas, or encountering environmental hazards if they leave supervised areas. Because the business complex is shared with other businesses, participants may also be at increased risk from vehicle traffic, unfamiliar individuals, or confusion when navigating the parking lot.

	Participants with mobility, sensory, cognitive, or visual impairments may require additional assistance and supervision when accessing the facility or participating in outdoor activities. How will the program reduce the potential of abuse and/or harm to people related to the type of grounds and terrain that surrounds the facility? Upon initiating services, participants at PAI Oakdale receive an orientation to the facility and the grounds. Participants are assisted when entering or exiting PAI Oakdale. Individuals are provided physical assistance, with their permission, in navigating outside the program facility. Staff members are present when individuals are outside of the program facility. Staff members have access to keys for locked areas such as the janitorial room, conference room, and storage closets. Participants are accompanied by staff members in all areas of the program unless otherwise stated in their specific support plan. PAI employs a professional snow removal company and uses de-icing materials to reduce ice buildup in the winter.
3.	Describe the type of internal programming provided at the program: Programming provided at the facility ranges from enrichment classes such as sensory integration to social skills groups. Individuals can engage in on-site Music and Animal Therapies and off-site community activities. Possible risks related to the type of internal programming provided at the program: Participants may be at risk of injury, peer conflict, bullying, exploitation, overstimulation, or unmet support needs during group activities or community programming if appropriate supervision and individualized supports are not provided. Participants with communication, behavioral, physical, or cognitive support needs may require accommodations to safely participate in activities. How will the program reduce the potential for risk and/or harm to participants through the type of internal programming provided at the program? PAI reduces the potential for risk and harm by designing programming that is person-centered, structured, and tailored to each participant's assessed needs, abilities, interests, and goals. Activities are planned to promote engagement, skill development, communication, social interaction, independence, and community inclusion while minimizing known risks. Staff provide active supervision throughout all programming and adjust support levels based on each participant's individual needs. Activities are modified as needed to accommodate physical, cognitive, behavioral, sensory, or communication needs so that participants can participate safely and successfully. Staff monitor participants for signs of distress, fatigue, conflict, or overstimulation and intervene early using positive support strategies to prevent escalation. Programming includes activities that promote emotional regulation, sensory integration, communication, social skills, self-advocacy, personal safety awareness, and healthy relationships. These activities help participants develop skills that reduce vulnerability to abuse, neglect, exploitation, bullying, and other forms of harm. Community-based activities are planned with consideration for participant safety, accessibility, staffing ratios, transportation, environmental risks, and emergency preparedness. Staff receive training on participant supervision, positive support practices, behavior prevention strategies, emergency procedures, and implementation of individualized support plans. Ongoing supervision, communication among team members, and regular review of participant needs help ensure programming remains safe, meaningful, and responsive to changes in participant support needs. Through individualized

	planning, trained staff, and appropriate supervision, PAI works to provide programming that promotes participant health, safety, dignity, and successful participation while reducing the risk of injury or harm.
4.	Describe the program's staffing pattern: The program hours for PAI Oakdale are from 9:00AM – 2:30PM and the building is accessible from 8:00AM – 4:00PM. Direct Support Professionals work 6.25-8 hour shifts. If staff need to miss work, they are instructed to call prior to the start of the program day. The staffing ratio of PAI Oakdale varies between 1:2 to 1:5 based on the support needs assessment of the individual.
	Possible risks related to the program's staffing pattern: Insufficient staffing or staff who are not familiar with participants' individual support needs may increase the risk of inadequate supervision, abuse, neglect, peer-to-peer incidents, delayed response to emergencies, or failure to implement individualized supports. Unexpected staff absences or changes in participant support needs may also affect participant safety if not addressed promptly.
	How will the program reduce the potential of abuse and/or harm to participants through the program's staffing pattern? Staffing levels are based on each participant's assessed support needs, the activities being provided, and the staff-to-participant ratios identified through the admission and assessment process. Staff are assigned to participants based on their training, experience, and familiarity with each participant's Support Plan, Support Plan Addendum (SPA), Self-Management Assessment (SMA), Individual Abuse Prevention Plan (IAPP), and Behavior Support Plan (BSP), when applicable. Programming is provided Monday through Friday. Participants enter the facility through a controlled entrance consisting of two sets of double doors. The interior doors between the foyer and the program remain open during program hours (8:00 a.m. to 4:00 p.m.) to allow staff to monitor participant arrivals, departures, and visitor access. Program Supervisors continuously monitor staffing levels throughout the day and adjust staff assignments based on participant attendance, activities, support needs, and unexpected changes. If staff call in or must leave during a shift, trained staff are reassigned to maintain appropriate supervision and participant safety. Program Supervisors are available to provide direct support as needed, and PAI maintains trained substitute staff to assist with open shifts. Participants requiring increased supervision or specialized supports receive those supports in accordance with their individualized service plans. Staff maintain communication throughout the day regarding participant locations, behavioral or medical concerns, and changes in support needs to help ensure continuity of care and prompt response to emergencies. If the program is unexpectedly closed due to severe weather or another emergency, Program Supervisors notify participant homes or caregivers and coordinate with PAI's transportation provider so participants are not transported to the program. Staff monitor the facility entrance, including the Ring Doorbell system, to ensure participants do not arrive unexpectedly by alternate transportation.

	Through ongoing supervision, appropriate staffing ratios, individualized staff assignments, trained personnel, and contingency planning, PAI works to reduce the risk of abuse, neglect, exploitation, injury, and other harm while protecting the health, safety, rights, and dignity of every participant.
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Each Program Must Ensure That:

1. Participants receiving services are provided with an orientation to the Program Abuse Prevention Plan (PAPP). This orientation must be within 24 hours of admission or within 72 hours for individuals who would benefit from a later orientation.
2. The Program Director, Chief Operating Officer and President must review and approve the PAPP at least annually.
3. A copy of the PAPP must be posted in a prominent place in the facility and be available upon request, to mandated reporters, participants receiving services, and legal representatives.
4. The PAPP must include a statement of measures to be taken to minimize the risk of abuse to vulnerable adults 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 licensed services.
5. If the assessment indicates that the vulnerable adult does not need specific risk reduction measures in addition to those identified in the PAPP, the Individual Abuse Prevention Plan (IAPP) must document this determination.
6. In addition to the PAPP, the IAPP must be developed for each new participant receiving services. A review of the IAPP must be done as part of the review of the program plan. The participants receiving services must participate in the development of the IAPP to the best of their abilities. All abuse prevention plans must be reviewed and updated annually.

Kennedy Smith
Program Director

Signed by:
Kennedy Smith
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Signature

7/27/2026

Date

Alicia McCallum
Chief Operating Officer

Signed by:
Alicia McCallum
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Signature

7/27/2026

Date

Michael Miner
President

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Mike Miner
CD00551BACCD425...
Signature

7/27/2026

Date