



Program Abuse Prevention Plan

Date Plan Was Developed: July 10, 2026
Next Review Date: July 2027

Program Name:	PAI Commerce
Program Abuse Prevention Plan Prepared By:	Cortney Kelly
Name and Title of Designated Manager:	Cortney Kelly, Senior Program Director
Approved Incident Reviewers [Name(s) and Title(s)]:	Cortney Kelly, Senior Program Director Felicia Jensen, Program Supervisor Courtney MacTavish, 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 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 Persons Receiving Services:
	18 and up.
	Possible Risks Related to Age:
	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. These risks may also include cognitive or memory changes that may affect a participant's ability to recognize, avoid, or report abuse, neglect, or exploitation. Plan to Reduce Risk to Persons Served: 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 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. The Commerce site has a Hoyer lift and grab bars for available use in the restroom. 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 programs are offered equally to all genders. Possible Risks Related to Gender: Restrooms are available throughout the building that can be accessed independently or with staff assistance. Participants supported have a wide range of understanding when it comes to sex and gender and may not understand or demonstrate appropriate boundaries. Participants who require assistance with personal cares or toileting may be at increased risk of abuse 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 and revised throughout the year as needed to reflect significant changes in the participant's needs, risk factors, or circumstances. 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 Commerce offers gender-specific restrooms as well as non-gender specific restrooms which are single occupancy. Staff will provide person-specific restroom and personal cares support. Programming will be offered onsite for participants that address appropriate boundaries, social skills, self-advocacy, healthy

	relationships, and sexuality. Staff will model appropriate boundaries. There will be a higher staff presence in the hallway during transition times, to ensure restrooms are used appropriately. All staff members at PAI Commerce 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 (ranging from mild to severe), severe and persistent mental illness, and brain injuries. Possible Risks Related to Mental Functioning: Participants may not have the knowledge or skills and abilities to meet their own personal health or safety needs. Socially, some participants may be more vulnerable than others – some using cell phones and social media, while others may not understand those concepts. There is a potential risk of participant bullying by other program participants, due to the wide range in mental functioning. Some participants may be more susceptible to coercion, financial exploitation, peer victimization, inappropriate relationships, or undue influence. 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 and revised as needed to reflect current risk factors and protective interventions, and service needs. 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 designated program break times to reduce opportunities for inappropriate peer-to-peer communication, cyberbullying, and other interactions that could increase the risk of abuse, 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 Commerce 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 participants receiving services: PAI supports individuals with a wide range of physical and emotional health needs. 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 and revised as needed to reflect current risk factors and protective interventions, and service needs. 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. The Commerce site is wheelchair and walker accessible, with a Hoyer lift and grab bars available for use in the restrooms. If a participant is experiencing a tough emotional health day, the Commerce site has a participant break space/sensory room that is available for use when a participant chooses to separate from the group. 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 and revised as needed to reflect current risk factors and protective interventions, and service needs. There is a participant break space/sensory room that is available for use when a participant chooses to separate from the group. This room does not have a door. Participants may access these break spaces independently and may remain without supervision, for up to 15 minutes, unless otherwise noted within their program plan.

	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. Commerce has a Hoyer lift available to assist participants with transfers during personal cares activities. Staff are trained in 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 and some staff members are required to have specific amounts of education, training, and experience in order to hold designated positions at PAI.

	Staff members require individualized training to safely and effectively provide person-centered services that respect each participant's preferences, rights, dignity, and assessed support needs. 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 substantiated claims of maltreatment at PAI Commerce. 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: The facility is a 14,435 square foot building that contains offices, classrooms, a participant break space/sensory room, breakroom, bathrooms, kitchen, a production floor, a small warehouse, and storage rooms. The building is licensed to provide support for 151 participants. PAI Commerce is one level. The facility has five doors that open to the outside and an additional loading dock sliding garage-style door. The facility is maintained in excellent condition and is structurally sound. Possible risks related to the condition and design of the facility: Our physical building may present risks such as slips, trips, and falls; elopement or unauthorized entry; difficulties during emergency evacuations; injuries during participant loading and unloading; and potential injuries from equipment onsite. In the back storage room near the loading dock, there is a pallet jack and other small machinery. When the garage door is open, there is about a 4-foot drop to the ground outside. 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 Professionals whose primary responsibilities include ensuring that all participants are accounted for. Some individuals may be assigned more support during times of transition as needed. The program's main hallways are equipped with hand railings. Direct Support Professionals assist with transitioning participants in and out of the building, ensuring that participants using wheelchairs and walkers are assisted away from curbs and to the main doors. The facility is professionally cleaned on a regular basis. Spills or obstacles are cleaned or removed promptly. Fire drills are held quarterly. Fire extinguishers are placed in multiple locations throughout the facility. Severe weather drills are held yearly.
2.	Describe any areas of the facility that are difficult to supervise: Commerce has multiple bathrooms throughout the building that are used independently and without supervision by participants unless otherwise noted within their support plan. There is frequent movement through the building each day during transition times which make the hallway areas extra busy and more difficult to supervise each individual person. There is a designated smoking area near the back of the building that may be utilized by participants. There is a participant break space/sensory room that is available for use when a participant chooses to separate from the group. This room does not have a door. Participants may access these break spaces independently. Participants who choose to use break areas are checked on per each person's program plan and no less than every 15 minutes. The desk at the building's front entrance is typically staffed two days per week. There are two Program Supervisors employed at PAI Commerce, whose offices are in 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. Private 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 per each person's program plan and no less than every 15 minutes. Direct Support Professionals are in the hallways during transition times to monitor. The front door remains unlocked during programming hours. There are two sets of sliding doors at this entrance that are solely operated by handicap accessible buttons nearby each. There are a Ring camera and doorbell hung up outside these doors so that visitors can ring for service. On the front desk, there is a clearly labeled tablet that indicates all guests need to sign in and out. There are two Program Supervisors employed at PAI Commerce, whose offices are in auditory range of the front entrance.

Environmental Assessment:

1.	Describe the location of the facility including information about the neighborhood and community where the facility is located: PAI Commerce is in a primarily industrial area of a metropolitan suburb, White Bear Lake. It sits at the end of a cul-de-sac near many other businesses and adjacent to a residential area.
	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, and contact with unfamiliar individuals. 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? Staff members take attendance and assist other staff members as needed in monitoring and supervising participants. Staff members are trained on the supervision requirements for participants. Staff members are present during hours participants are present.
2.	Describe the type of grounds and terrain that surround the facility: PAI Commerce has a parking lot to the North and East of the building. The parking lot entrance is located to the Northeast. There is a residential area including a pond to the South of the building. The building sits at the end of a cul-de-sac. The parking lots are paved and there is a sidewalk the runs along the front of the building.

	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 sidewalks, parking lots, curb transitions, uneven surfaces, or during inclement weather. 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? Upon initiating services, participants at PAI Commerce receive an orientation to the facility and the grounds. Staff are present when people are exiting and entering the building at peak transportation times. There are yellow lines drawn on the parking lot surface to assist drivers in parking for participants to safely load and unload transportation. Direct Support Professionals assist with transitioning participants in and out of the building, ensuring that participants using wheelchairs and walkers are assisted away from curbs and to the main doors. De-icing agents are used on the parking lot to reduce ice buildup.
3.	Describe the type of internal programming provided at the program: Programming provided at the facility includes programming focused on movement, discovery, creative expressions, sensory, and social skills activities. Individuals can engage in on-site music and animal therapies and off-site community activities. Many participants work on-site on the production floor. 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 Commerce are from 7:30AM – 1:00PM and the building is accessible from 7:30AM – 3:00PM. Direct Support Professionals work 6.25-8 hour shifts, always covering the 7:15AM-1:30PM span. If staff need to miss work, they are instructed to call prior to the start of the program day. The staffing ratio of PAI Commerce varies between 1:3 to 1:7 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. The entrance through which participants enter the facility consists of two sets of sliding glass doors. The interior doors that open from the foyer to the interior of the facility are open from 7:30AM to 3:00PM Monday through Friday. The staffing needs of persons served are assessed prior to admission to the program. If the program is unexpectedly closed on a day of scheduled operation due to severe weather, the program supervisors will attempt to reach the home of each participant scheduled to attend PAI that day and our transportation partner, Newtrax, will not pick up anyone. There are a Ring camera and doorbell at the front bussing door that will be utilized by the program director and program supervisors to ensure that no participants show up onsite by mode of alternate transportation. If staff call-in for a shift or need to leave due to an emergency, Program Supervisors will adjust staffing throughout the building based on assessed needs and staff training. Program Supervisors are available to provide direct support as needed. In addition, PAI maintains a list of substitute staff who help to pick-up open shifts.

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.

Cortney Kelly

Program Director

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Cortney Kelly

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7/27/2026

Date

Alicia McCallum

Chief Operating Officer

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Alicia McCallum

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7/27/2026

Date

Mike Miner

President

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Mike Miner

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Date