| Program Abuse Prevention Plan | Date Plan Was Developed | July 14, 2020 |
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| | Approval Date of PAI President and Board of Directors | July 31, 2020 |

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| **Program Name:** | PAI Parkway |
| **Program Abuse Prevention Plan Prepared By:** | Kevin Kmetz |
| **Name and Title of Designated Manager:** | Kevin Kmetz, Program Director |
| **Approved Incident Reviewers [Name(s) and Title(s)]:** | Kevin Kmetz, Program Director<br>Jessica Gunderson, Program Supervisor<br>Kennedy Norwick, Program Supervisor |

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| **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 Vice President of Operations as needed. In the absence of the Program Director and Program Supervisors, the most senior Lead Direct Support Professional staff will assume supervisory responsibilities. |

**Population Assessment:**

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| **1.** | **Age Range of Persons Receiving Services:**<br><br>22-68 |
| **2.** | **How will the program reduce the potential of abuse and/or harm to participants related to the age of the participant receiving services?**<br><br>Staff members are trained on the participant's Coordinated Service and Support Plan (CSSP), Coordinated Service and Support Plan Addendum (CSSPA), Self-Management Assessment (SMA), and Behavior Support Plan (BSP) for all participants.<br><br>Handrails are provided in main hallways, hallways are kept free of debris and spills, and sidewalks are kept free of snow and ice.<br><br>If it is determined that additional support services are needed related to age, PAI will assess whether we are able to provide the additional supports. If unable, PAI will refer individuals for additional support and/or alternate programs better suited to their needs. |
| **3.** | **Gender of Participants Receiving Services:**<br><br>Male, Female, and Non-Binary; PAI programs are offered equally to all genders. |

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| 4. | **How will the program reduce the potential of abuse and/or harm to participants related to the gender of the participant receiving services?**<br><br>Individual Abuse Prevention Plans (IAPP) are created for participants prior to service initiation. In addition, the SMA is created within 45-days of service initiation. These documents help assess support needs including those related to gender. If it is determined that 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.<br><br>PAI Parkway offers gender-specific restrooms as well as non-gender specific restrooms which are single occupancy. |
| 5. | **Describe the range of mental functioning of participants receiving services:**<br><br>PAI supports participants with a wide range of mental functioning, including intellectual and developmental disabilities, severe and persistent mental illness, and brain injuries. |
| 6. | **How will the program reduce the potential of abuse and/or harm to participants related to the mental functioning of the participant receiving services?**<br><br>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. |
| 7. | **Describe the range of physical and emotional health of people receiving services:**<br><br>At PAI, we work with a wide array of individuals, each unique in their personalities, their strengths, and their physical/emotional health. |
| 8. | **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?**<br><br>Participants who have mobility concerns are escorted from the vans to the door of the building if it is icy. If a participant has emotional health needs, staff members will assist in the administration of medications for anxiety as needed. PAI provides training to staff in medication administration. All reasonable accommodations are made for participants regarding their disability.<br><br>Handrails are provided in main hallways, hallways are kept free of debris and spills, and sidewalks are kept free of snow and ice. |
| 9. | **Describe the range of adaptive/maladaptive behavior(s) of participants receiving services:**<br><br>At PAI, we work with participants with a wide variety of adaptive/maladaptive behaviors such as mild to severe aggression, people who have concerns with personal boundaries, and/or people who might harm themselves. |
| 10. | **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?**<br><br>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. This is one of the ways PAI can reduce the potential of abuse and/or harm to participants.<br><br>PAI Parkway also offers multiple break spaces that participants may use so that they can choose to separate themselves from others. |
| 11. | **Describe the need for specialized programs of care for participants receiving services:** |

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| | The participants supported at PAI may need a wide variety of specialized programs of care depending on their unique circumstances. These programs may include meal planning, sensory protocols, and boundaries programming. |
| 12. | **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?**<br><br>PAI offers wellness programs for staff members and participants. Staff are trained on any specialized programs of care prior to providing that support. |
| 13. | **Describe the need for specific staff training to meet individual service needs:**<br><br>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. |
| 14. | **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?**<br><br>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 Manager of Training and Programming who provides additional training and support based upon PAI's unique needs as an organization. |
| 15. | **Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to participants receiving services:**<br><br>There are no substantiated claims of maltreatment at PAI Parkway.<br><br>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. |
| 16. | **How will the program reduce the potential of abuse and/or harm to participants related to the knowledge of previous abuse?**<br><br>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:**

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| 1. | **Describe the condition and design of the facility as it relates to the safety for the participants receiving services:**<br><br>The facility is a 14,288 square foot building that contains offices, classrooms, breakrooms, bathrooms, kitchen, a designated work floor area for on-site shredding, and storage rooms. It is licensed to provide support for 75 participants. PAI Parkway is one level. The facility has five doors that open to the outside. The facility is maintained in excellent condition and is structurally sound. |
| 2. | **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?**<br><br>The facility employs Lead Direct Support Professional Staff and Direct Support Professional Staff whose primary responsibilities include ensuring that all participants are accounted for. The facility is cleaned on a |

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| | 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. |
| 3. | **Describe any areas of the facility that are difficult to supervise:**<br><br>Restrooms can be difficult to supervise due to privacy. Break areas can be difficult to supervise due to their proximity from program areas. |
| 4. | **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?**<br><br>The facility employs Lead Direct Support Professional Staff and Direct Support Professional Staff 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. |

**Environmental Assessment:**

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| 1. | **Describe the location of the facility including information about the neighborhood and community where the facility is located:**<br><br>PAI Parkway is in a primarily industrial area of a metropolitan suburb, White Bear Lake. There are office buildings nearby in addition to residential neighborhoods. |
| 2. | **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?**<br><br>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. Staff members are present during hours participants are present. |
| 3. | **Describe the type of grounds and terrain that surround the facility:**<br><br>There is a marsh to the West and an empty lot to the South. The parking lot is to the North of the building and the bussing drive through is to the East. There is some gently rolling terrain in the area surrounding the facility. |
| 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?**<br><br>Staff are present when people are exiting or entering the building at peak transportation times. De-icing agents are used on the parking lot to reduce ice buildup. Participants receive orientation to the building and grounds upon service initiation. |
| 5. | **Describe the type of internal programming provided at the program:**<br><br>Programming provided at the facility ranges from enrichment classes such as cooking to healthy boundaries. Some participants work on-site completing document shredding for other businesses. |
| 6. | **How will the program reduce the potential for risk and/or harm to participants through the type of internal programming provided at the program?**<br><br>Some class offerings, such as healthy boundaries, may reduce the potential for abuse or harm. Staff members are trained on how to supervise participants and meet their needs. Opportunities for community integration may help build functional skills that reduce the susceptibility to abuse. |
| 7. | **Describe the program's staffing pattern:**<br><br>The program's staffing pattern varies according to the type of programming provided. |

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| | **How will the program reduce the potential of abuse and/or harm to participants through the program's staffing pattern?** |
| **8.** | Programming is provided Monday through Friday. The reception area is staffed. 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 3:30PM Monday through Friday. The staffing needs of person served are assessed prior to admission to the program. |

**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, Vice President of Operations, President and Operations Committee of the Board of Directors 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.

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| Kevin Fretz | | 7/31/2020 |
| Program Director | Signature | Date |
| Alicia McCallum | | 7/31/2020 |
| Vice President of Operations | Signature | Date |
| Michael Miner | | 7-31-20 |
| President | Signature | Date |