



Program Abuse Prevention Plan	Date Plan Was Developed	July 20, 2021
	Approval Date of PAI President and Chief Operating Officer	July 27, 2021

Program Name:	PAI Linden
Program Abuse Prevention Plan Prepared By:	Mitch Gunderson-Palmer
Name and Title of Designated Manager:	Mitch Gunderson-Palmer, Program Director
Approved Incident Reviewers [Name(s) and Title(s)]:	Mitch Gunderson-Palmer, Program Director Briana Hinzman, Designated Coordinator Beth Blackorbay, Designated Coordinator

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 most senior Lead Direct Support Professional staff will assume supervisory responsibilities.
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Population Assessment:

1.	Age Range of Persons Receiving Services: 23-76
2.	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 Coordinated Services and Supports Plan (CSSP), Coordinated Services and Supports Plan Addendum (CSSPA), Self-Management Assessment (SMA), and Behavior Support Plan (BSP) for all participants. Handrails are provided in main hallways, hallways are kept free of debris and spills, and sidewalks are kept free of snow and ice. Doors leading to circuit breaker area, storage rooms, and janitorial area are kept closed when not in use. Wheelchairs are available for general use as mobility needs arise. Staff are present during arrival and pick-up times to assist participants orientation to and from transportation. Program rooms are staffed beyond the level required by the 245D ratio to ensure proper supervision.
3.	Gender of Participants Receiving Services: Male and Female; PAI Linden is offered equally to both genders.

4.	<p>How will the program reduce the potential of abuse and/or harm to participants related to the gender of the participant receiving services?</p> <p>Individual Abuse Prevention Plan (IAPP) is 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 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.</p> <p>PAI Linden has multi-occupancy 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.</p> <p>Program rooms are staffed beyond the level required by the 245D ratio to ensure proper supervision.</p>
5.	<p>Describe the range of mental functioning of participants receiving services:</p> <p>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 Linden range from moderate to profound intellectual disability.</p>
6.	<p>How will the program reduce the potential of abuse and/or harm to participants related to the mental functioning of the participant receiving services?</p> <p>Each participant is assigned a Designated Coordinator, who is a staff member responsible for coordinating the various services the participant receives. Staff members are trained on the specific strengths and needs of the people they support, and the requirements for service delivery.</p>
7.	<p>Describe the range of physical and emotional health of people receiving services:</p> <p>At PAI, we work with a wide array of individuals, each unique in their personalities, their strengths, and their physical/emotional health. Participants at Linden often have extensive and complex physical health needs. Due to physical support needs, the individuals may require the use of an adaptive aide such as a walker or wheelchair for mobility and require support with fine and gross motor tasks.</p>
8.	<p>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?</p> <p>The Linden program is a single level facility with multiple accessible entrances. Participants with mobility support needs are escorted from the vans to their designated program area. Participants receive assistance in navigating the program environment throughout the day. The hallways have railings for people to use as a guide and a support. Mat tables are available in the restrooms for participants who have limited balance and torso control. Portions of Linden have an in-ceiling track system in addition to electric lifting equipment to aide in transferring individuals for personal care needs.</p> <p>Participants start their day in their designated program area and are present with a staff person while at PAI. The Linden program provides a structured daily routine with individualized elements to promote positive emotional health of participants. PAI provides training to staff in medication administration and first aid. All reasonable accommodations are made for participants regarding their disability.</p> <p>Hallways are kept free of debris and spills, and sidewalks are kept free of snow and ice. Program rooms are staffed beyond the level required by the 245D ratio to ensure proper supervision.</p>
9.	<p>Describe the range of adaptive/maladaptive behavior(s) of participants receiving services:</p>

	At PAI, we work with participants with a wide variety of adaptive/maladaptive behaviors. These adaptive/maladaptive behaviors within PAI Linden may include mild aggression, people who have concerns with boundaries with others, and/or people who may harm themselves.
10.	<p>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?</p> <p>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. Staff are trained to the positive behavior support strategies.</p>
11.	<p>Describe the need for specialized programs of care for participants receiving services:</p> <p>The participants supported at PAI may need a wide variety of specialized programs of care depending on their unique circumstances. PAI Linden specialized programs teach communication skills, sensory integration, physical activity, and self-advocacy to reduce the potential risk to participants.</p>
12.	<p>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?</p> <p>PAI offers wellness programs for staff members and participants. Staff are trained on offered programs and able to reference materials as needed. Participants are offered the choice of all programs and programs topics are repeated to provide ample opportunities for individuals to engage.</p>
13.	<p>Describe the need for specific staff training to meet individual service needs:</p> <p>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. Within PAI Linden, staff members are trained on seizure disorders, use of lifting equipment, the in-ceiling track system, aging and memory loss.</p>
14.	<p>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?</p> <p>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.</p>
15.	<p>Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to participants receiving services:</p> <p>There are no known incidents of substantiated abuse at PAI Linden.</p> <p>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.</p>
16.	<p>How will the program reduce the potential of abuse and/or harm to participants related to the knowledge of previous abuse?</p> <p>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.</p>

Physical Plan Assessment:

1.	<p>Describe the condition and design of the facility as it relates to the safety for the participants receiving services:</p> <p>The facility contains offices, a conference room, informal gathering spaces, large and small program room spaces, restrooms, a breakroom, a kitchen, a laundry area and a maintenance room. The facility is single-story and has three sets of double doors that open to the outside as well as two emergency exits. All non-emergency exit doors are equipped with electric doors that open manually or can be held open. The primary entrance doors are in the front of the building. The North entrance doors remain locked during hours of service with crash bars on the inside of the doors that would allow exit in the event of an emergency evacuation. The South entrance doors are locked during service hours outside of loading/unloading transportation. PAI Linden's exterior walkway has a large step down into the parking lot. The facility is maintained in excellent condition and is structurally sound.</p>
2.	<p>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?</p> <p>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 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.</p> <p>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.</p>
3.	<p>Describe any areas of the facility that are difficult to supervise:</p> <p>The supervision of restroom areas within the program may be difficult to supervise due to privacy of participants.</p>
4.	<p>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?</p> <p>PAI Linden employs Direct Support Professional Staff and Lead Direct Support Professional Staff whose primary responsibilities include ensuring all participants are accounted for.</p>

Environmental Assessment:

1.	<p>Describe the location of the facility including information about the neighborhood and community where the facility is located:</p> <p>PAI Linden is in an industrial area of White Bear Lake, a metropolitan suburb. There are other business, offices, and apartment buildings nearby.</p>
2.	<p>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?</p> <p>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.</p>
3.	<p>Describe the type of grounds and terrain that surround the facility:</p>

	<p>The terrain around PAI Linden is relatively flat and have concrete sidewalks and a paved parking lot surface. There are accessible ramps on the sidewalk in front of the building. The sidewalk in front of PAI Linden has a step down into the parking lot directly in front of the three primary entrances. There is some gently rolling terrain in the area surrounding the facility. The Linden location is bordered on one side by Country Rd. E which does experience heavy traffic.</p>
4.	<p>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?</p> <p>Upon initiating services, participants at PAI Linden receive an orientation to the facility and the grounds. The building has its own separate driveway with a designated bus loading area which is not shared with any local businesses. There are yellow lines drawn on the parking lot surface to assist drivers in parking for participants to safely load and unload transportation. Individuals are provided physical assistance, with their permission, in navigating outside the program facility. Staff are present when individuals are outside of the program facility. Staff have access to keys for locked areas such as maintenance room and storage closets. Participants are accompanied by staff 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.</p>
5.	<p>Describe the type of internal programming provided at the program:</p> <p>Programming provided at the facility ranges from enrichment classes such as sensory integration to social skills groups. Individuals can engage in on-sight Music and Animal Therapies and off-site community activities.</p>
6.	<p>How will the program reduce the potential for risk and/or harm to participants through the type of internal programming provided at the program?</p> <p>Some class offerings, such as sensory integration, may reduce the potential for harm. Staff members are trained on how to supervise participants and meet their needs.</p>
7.	<p>Describe the program's staffing pattern:</p> <p>The program's staffing pattern varies according to the type of programming provided. The staffing ratio of PAI Linden varies between 1:2 to 1:6 based on the support needs assessment of the individual. Program rooms are staffed beyond the level required by the 245D ratio.</p>
8.	<p>How will the program reduce the potential of abuse and/or harm to participants through the program's staffing pattern?</p> <p>Programming is provided Monday through Friday. The reception area is staffed. The entrance through which participants enter the facility consists of two sets of double doors. The interior doors that open from the foyer to the interior of the facility are open from 7:45AM to 3:45PM Monday through Friday. The staffing needs of person served are assessed prior to admission to the program.</p>

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.

Mitch Gunderson-Palmer
Program Director

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Mitch Gunderson-Palmer
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Signature

July 20, 2021
Date

Alicia McCallum
Chief Operating Officer

DocuSigned by:
Alicia McCallum
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Signature

July 27, 2021
Date

Michael Miner
President

DocuSigned by:
Mike Miner
CD00531BACCD425...
Signature

July 27, 2021
Date