



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 Oakdale
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 Emily Elsenpeter, 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.
---	--

Population Assessment:

1.	Age Range of Persons Receiving Services: 23-71
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 the circuit breaker area, storage room, 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 to and from transportation.
3.	Gender of Participants Receiving Services: Male and Female; PAI Oakdale is offered equally to both genders.
4.	How will the program reduce the potential of abuse and/or harm to participants related to the gender of the participant receiving services?

	<p>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 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 Oakdale has gender specific restrooms and non-gender specific restrooms which are single occupancy.</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 Oakdale 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 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.</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 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.</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 Oakdale program is a single level facility with an accessible front entrance. Participants who have mobility support needs are escorted from the vans to the designated program area. Participants receive assistance in navigating the program environment throughout the day. The hallways have railings to use as a guide and a support. The toilets in participant restrooms have handles to assist with balance. Mat tables are available to participants with limited balance and torso control in restroom areas. Assistive electric lifting equipment is available to aid individuals in transferring their bodies.</p> <p>Participants start their day in their designated program area and are present with a staff person while at PAI. The Oakdale program provides a structured daily routine with individualized elements to promote positive emotional health of participants. If a participant has further 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.</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> <p>At PAI, we work with participants with a wide variety of adaptive/maladaptive behaviors. These adaptive/maladaptive behaviors within PAI Oakdale may include mild to moderate aggression, people who have concerns with boundaries with others, and/or people who may harm themselves.</p>

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. At PAI Oakdale, 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 any specialized programs of care prior to providing that support. Participants are offered the choice of all programs and 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. At PAI Oakdale, staff members are trained on seizure disorders, use of lifting equipment, 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 Oakdale.</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 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 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. All the facility doors that open to the outside either have an alarm that sounds when the door is opened to aid monitoring by staff members. The program main hallways are equipped with railings. All the participant restrooms within PAI Oakdale are accessible. The facility is professionally cleaned on a regular basis. Spills or obstacles are cleaned or removed promptly. The primary entrance of the program is supervised by a staff member during the program day and all visitors are required to sign in.</p> <p>Fire drills are held quarterly. Fire extinguishers are placed in multiple locations throughout the facility near each of the two entrances and in the participant kitchen area.</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 Oakdale 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 Oakdale is in a business complex area in Oakdale, a metropolitan suburb. There are other businesses and industries nearby and frequent large truck traffic through the parking lot.</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>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.</p>
3.	<p>Describe the type of grounds and terrain that surround the facility:</p> <p>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</p>

	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.
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 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.</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-site 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 Oakdale varies between 1:2 to 1:5 based on the support needs assessment of the individual. Program rooms are staffed beyond the level required by the 245D ratio. 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 8:00AM to 4:00PM 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

DocuSigned by:
Mitch Gunderson-Palmer
2897F79FC746483...
Signature

July 20, 2021
Date

Alicia McCallum
Chief Operating Officer

DocuSigned by:
Alicia McCallum
C91E8D4AE79A459...
Signature

July 27, 2021
Date

Michael Miner
President

DocuSigned by:
Mike Miner
CD00561BAGGD425...
Signature

July 27, 2021
Date