



Program Abuse Prevention Plan

Program:	MRCI East Park	
Address:	1750 Energy Drive	
	Mankato, MN 56001	
Date plan developed:	8/2014	Revised Date: 7/2019

EACH PROGRAM MUST ENSURE THAT:

- A. People receiving services are provided with an orientation to the program abuse prevention plan. This orientation must be within 24 hours of admission or within 72 hours for individuals who would benefit from a later orientation.
- B. The license holder's governing body or the governing body's delegated representative shall review the plan at least annually using the assessment factors in the plan and any substantiated maltreatment findings that occurred since the last review period. The governing body or the governing body's delegated representative shall revise the plan, if necessary, to reflect the review results.
- C. A copy of the program abuse prevention plan must be posted in a prominent place in the facility and be available, upon request, to mandated reporters, people receiving services, and legal representatives.
- D. If the assessment indicates that the vulnerable adult does not need specific risk reduction measures in addition to those identified in the program abuse prevention plan, the individual abuse prevention plan must document this determination.
- E. In addition to the program abuse prevention plan, an individual abuse prevention plan must be developed for each new person receiving services. A review of the individual abuse prevention plan must be done as part of the review of the program plan. The persons receiving services must participate in the development of the individual abuse prevention plan to the best of their abilities. All abuse prevention plans must be reviewed at least annually by the interdisciplinary team.

POPULATION ASSESSMENT:

- 1. Age range of persons receiving services:

MRCI East Park supports adults who are 18 years and older.

- 2. What specific measures has the program taken to minimize the risk of abuse to people as related to the age of people receiving services?

Staff are on the premises at all times when individuals are present. As requested (e.g. by an employee of the site) and/or as needed (e.g. by the Individual Service Plan/CSSP Addendum of an individual client), staff will receive special training related to the aging process, aging related conditions, and discrimination. All staff are trained annually in Maltreatment of Vulnerable Adults Act. Any MRCI staff having knowledge of an incident of suspected maltreatment of a vulnerable adult will make a report either internally or externally, following all procedures outlined in the MRCI VA policy.

- 3. Gender of persons receiving services:

MRCI East Park supports both men and women.

- 4. What specific measures has the program taken to minimize the risk of abuse to people related to the gender of people receiving services?

MRCI East Park has separate male/female restrooms and single person restrooms. All individuals are offered boundary training as needed per their individual vulnerabilities/behaviors. If two individuals are in a relationship, they are encouraged to maintain professional boundaries throughout their day at MRCI. When personal cares are needed, the same gender staff will help the individuals

whenever possible. Staff are on the premises at all times when individuals are present. As requested (e.g. by the Individual Service Plan/CSSP Addendum of an individual client), staff will receive special training related to gender related conditions and discrimination. All staff are trained annually in Maltreatment of Vulnerable Adults Act. Any MRCI staff having knowledge of an incident of suspected maltreatment of a vulnerable adult will make a report either internally or externally, following all procedures outlined in the MRCI VA policy

5. Describe the range of mental functioning of persons the program plans to serve:

Individuals at MRCI East Park have a diagnosis of developmental disability (based on the psychological report) or a related condition as identified in MN Statute 9525.1500 Subpart 27 including cerebral palsy, epilepsy, autism, or other conditions which relate in the impairment of general intellectual functioning that is likely to continue indefinitely, provides substantial functional limitations in 3 or more major life activity areas, or has been approved by the commissioner. MRCI East Park supports individuals with a wide range of cognitive functioning, from mild to profound developmental disability.

6. What specific measures has the program taken to minimize the risk of abuse to people as related to the mental functioning of people receiving services?

Each client has individual plans (Individual Abuse Prevention Plan, Self-Management Assessment, etc.) which outline their abilities and support needs from staff.

Staff receive client specific training annually regarding the unique needs of each individual as determined in their support plans (e.g. CSSP Addendum, Self-Management Assessment, and Individual Abuse Prevention Plan). This training could include but is not limited to communication, visual cues, positive behavior support, social skills, vocational skills, etc..

MRCI trains all staff annually in the Maltreatment of Vulnerable Adults Act. Any MRCI staff having knowledge of an incident of suspected maltreatment of a vulnerable adult will make a report either internally or externally. The reporter shall follow the procedure outlined in the policy regarding reporting of suspected maltreatment of individuals.

7. Describe the range of physical and emotional health of persons the program plans to serve:

Individuals served range in their physical and emotional abilities from needing no assistance from staff to needing full assistance from staff to implement their supports and procedures. Staff are trained to help people with supports based on a wide range of physical and emotional needs including, but not limited to: mild to profound mental retardation, ADHD, asthma, autism, blindness, cerebral palsy, DCD, deafness, dementia, depression, diabetes, Down's Syndrome, fetal alcohol syndrome, g-tube, hearing loss, heart defects, hepatitis B, Klinefelter syndrome, MRSA, obesity, ODD, osteoarthritis, osteopenia, personality disorders, PICA, polydipsia, post-traumatic stress disorder, Prader-Willi, quadra paresis, reactive detachment disorder, Rhetts syndrome, San Filippo Syndrome Type A, schizophrenia, seizures, Smith-Magenis Syndrome, spastic quadriplegia, TBI, Trisomy 8 Syndrome, ulcers, and Wernicke-Korsakoff's Syndrome

8. What specific measure has the program taken to minimize the risk of abuse to people as related to the physical and emotional health of people receiving services served?

Regarding any physical concerns for individuals, the MRCI East Park site is barrier free. The building is all one level, five doorways around the building have electronic openers and the hallways are wide for easy navigation. All regular staff are trained annually on each individual's support plan (e.g. CSSP Addendum, Self-Management Assessment, and Individual Abuse Prevention Plan), which includes information on how to work with each individual to best meet their physical and emotional needs. All staff who work directly with an individual who requires additional staff training will receive that training from either a nurse (for medical training) or a trained staff or professional (for behavioral/mental health training). Staff at MRCI East Park receive specific training regarding seizures, G-tubes, lifts,

standers, and adaptive equipment as needed. All staff are trained on positive supports. Specialized training is provided to the individuals receiving services in the areas of communication, mental health, behavior management, activities of daily living, safety, motor development and social skills. This list is not totally inclusive, since training is provided on an individual basis when more detailed or specialized instruction is indicated, or as areas of vulnerability arise or recur. Instruction is provided in small groups or on a one-to-one basis depending on the individual's abilities to learn and their compatibility with others. We firmly believe that by training clientele in self-advocacy, rights and responsibilities, that their ability to participate in their own safety management is improved. Staff are on the premises at all times when individuals are present.

MRCI trains all staff annually in the Maltreatment of Vulnerable Adults Act. Any MRCI staff having knowledge of an incident of suspected maltreatment of a vulnerable adult will make a report either internally or externally. The reporter shall follow the procedure outlined in the policy regarding reporting of suspected maltreatment of individuals.

9. Describe the range of adaptive/maladaptive behavior(s) of persons the program plans to serve:

The clients served have varying ranges of ability in their adaptive skills of communication, assertiveness, and dealing with feelings and situations. Each individual responds differently to situations and some do not respond at all. Some individuals require interventions such as modeling and verbal reminders as a means to redirect them to appropriate coping strategies. Some individuals are able to fully communicate verbally both expressively and receptively. Many individuals require some level of assistance with communication and appropriate assertiveness. Some individuals are completely non-verbal and communicate through facial expressions such as smiling and or making vocalizations. Other individuals are able to mimic some words or phrases but are unaware of the meaning behind those statements or requests. Other individuals are able to communicate with the use of sign language and or pointing to or showing an object of desire.

We support individuals with maladaptive behaviors of physical aggression, property destruction, self-injurious behavior, and verbal aggression. In certain instances or sometimes out of unknown causes, individuals can display maladaptive or inappropriate behavior. Specifically, this can include but is not limited to yelling, crying, swearing, spitting, swatting, hitting, biting, hitting one's head with their hands, and throwing objects to harm self or others. These areas are further described in each individual's CSSP Addendum.

10. How will the program reduce the potential of abuse and/or harm to people related to the adaptive/maladaptive behavior(s) of the people receiving services served?

All staff are trained annually on each individual's support plan (e.g. CSSP Addendum, Self-Management Assessment, and Individual Abuse Prevention Plan), which includes information on how to work with each individual to best meet their needs. All staff are trained in positive supports. Specialized training is provided to the staff providing services and to the individuals receiving services in the areas of expressive and receptive communication (in an effort to teach clientele how to express needs that can be more efficiently met), mental health, behavior management, safety, and social skills. This list is not totally inclusive, since training is provided on an individual basis when more detailed or specialized instruction is indicated, or as areas of vulnerability arise or recur. Staff training has a strong focus on de-escalation instruction and focusses on situational interventions that are proper for the specific client and behavioral circumstances, and is provided in small groups and/or on a one-to-one basis, depending on the staff person's style of learning and their compatibility with others. Staff are on the premises at all times when individuals are present. All staff are trained annually in Maltreatment of Vulnerable Adults Act. Any MRCI staff having knowledge of an incident of suspected maltreatment of a vulnerable adult will make a report either internally or externally, following all procedures outlined in the MRCI VA policy.

11. Describe the need for specialized programs of care for persons the program plans to serve:

Programming at East Park focusses on teaching self-help skills, communication modes, social skills, work skills in-house and in the community, cognitive and adaptive skills, domestic skills, community integration and leisure time plans. The objective of the programming is to promote the individuals' independence and to help them have a day that is full of meaningful opportunities and activities. The programming is specifically designed to meet the needs and interests of the clients based on Person Centered programming indicating the differences of what is important to the individual versus what is important for the individual. Some individuals live at residences governed by the department of health which require certain types of active treatment to be provided for each individual.

12. What specific measures has the program taken to minimize the risk of abuse to people as related to the need for specialized programs of care for people receiving services?

In order to reduce the potential of abuse and/or harm to clients served, specifically regarding specialized programs of care, all individuals receive care from trained staff who have had a criminal background study and have been trained on MRCI's policies and procedures related to specialized programs of care. Team Leaders provide hands on training with staff and monitor regularly for staff competency. Team Leaders work closely with residential nursing staff to develop procedures and train staff when individuals have new diagnoses that require specific cares or treatments. Health Counseling Services trains staff in medication administration and oversees annual retraining.

Any other form of specialized care is indicated on each individual's Coordinated Service and Support Plan (CSSP). The Case Manager is aware of all coordinated services and specialty cares in continuation of the individual services. Team Leaders communicate with the individual's interdisciplinary team about any changes in care or services and regularly report as decided by the team, but at least annually, to review all services and outcomes.

13. Describe the need for specific staff training to meet individual service needs:

All MRCI staff are trained on the following: First Aid, Safe Lifting, Medication Administration, Fire Prevention, Mandt and other annual trainings listed in MRCI staff training documents. Some staff receive CPR training depending on the diagnoses of individuals they work with. MRCI East Park has a specific orientation packet which outlines client specific training, and DHS required training: food preparation/handling, infection control, defensive driving, Emergency Procedures, HIPAA, and related OSHA training; including competency tests. Within 48 hours of hire, MRCI staff are trained on Vulnerable Adult and Maltreatment Reporting and can take the steps to prevent abuse, take corrective action, and immediately report maltreatment as directed by MRCI policy and procedures which is regulated by licensing requirements of the Department of Human Services (DHS).

Specific medical training for staff at MRCI East Park is based on individual specified services which include but are not limited to administering medication and treatments such as nebulizers, preparing food as ordered by physicians, administering water flushes for g-tubes, and range of motion exercises. Staff are trained on individual's specified allergies, seizure protocol, choking, and chronic medical conditions; are able to identify symptoms and prevent further symptoms taking corrective action; and reporting emergency situations to qualified professionals as indicated on the procedures.

Staff are trained on safe transfer, transport and general lifting techniques including all assistive devices such as the Medicare Care Stand, Hoyer lift, the use of transfer belts and each individual's personal equipment such as wheelchairs, walkers, arm braces, leg braces, ted-socks; and sensory items such as massagers, weighted blankets, z-vibe, and toothbrushes.

14. What specific measures has the program taken to minimize the risk of abuse to people as related to the need for specific staff training designed to meet individual service needs?

In order to reduce the potential of abuse and/or harm to individuals served, specifically regarding the need for specific staff training, MRCI staff are trained and oriented in the items required by MN Statutes, Chapter 245D; and on the above responsibilities in a specific sequential order to maximize competency. Training and orientation requires staff to read and comprehend materials and then to model specific therapies and treatments as specified. Staff perform on the job training with a mentor (lead staff). Staff perform the routine duties and are given feedback throughout their training hours and during direct meetings with their supervisor. Ongoing training and record retention is kept by the Human Resource staff. Specific safety training pertaining to MRCI East Park includes: safety drills for fires, tornadoes, evacuations due to things like gas leaks, intruders, etc. MRCI has a Safety Coordinator who works with staff at MRCI East Park to ensure the building is up to regulatory code and procedural drills are being completed by staff.

All MRCI staff are trained on Maltreatment of Vulnerable Adults Act and can take the steps to prevent abuse, take corrective action, and immediately report maltreatment as directed by MRCI policy and procedures which are regulated by licensing requirements of Department of Human Services (DHS). The Internal Review Committee reviews all emergency use of manual restraints reported. They follow state and federal guidelines required for reporting maltreatment and vulnerable adult issues.

15. Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to people receiving services: (Any substantiated maltreatment findings that occurred since the last review, June 2017-June 2018)

There have been no substantiated maltreatment findings that occurred at MRCI East Park from June 2018 - June 2019.

16. What specific measures has the program taken to minimize the risk of abuse to people as related to the knowledge of previous abuse? (Were there any revisions made to reflect review results.)

Staff at MRCI East Park participate in the construction of an Individual Abuse Prevention Plan for every individual enrolled in the licensed program. Staff use this as a primary teaching tool for awareness of individual vulnerabilities to abuse/neglect as well as outlining action plans to minimize that abuse/neglect. MRCI retains all records that we have "on file" related to abuse/neglect and includes those events and records as a part of the individual client's file. It is MRCI's intention that staff are oriented to relevant, client specific, records as a part of their initial and ongoing training. Some previous abuse and/or neglect might not be known by MRCI, and some may be so "historic" that it is no longer a part of the individual client's IAPP/CSSP-Addendum. Staff are on the premises at all times when individuals are present. All staff are trained annually in the Maltreatment of Vulnerable Adults Act. Any MRCI staff having knowledge of an incident of suspected maltreatment of a vulnerable adult will make a report either internally or externally, following all procedures outlined in the MRCI VA policy.

PHYSICAL PLANT ASSESSMENT:

1. Describe the condition and design of the facility as it relates to safety for the people receiving services:

The MRCI East Park program site at 1750 Energy Drive is located in an industrial park on the East side of Mankato. The area is being developed, so currently the only neighbor to the site is a Fed Ex building to the North. The building was designed to provide safe and functional space for the clientele and staff using the site. The building was designed with large hallways and walkways to allow for safe transitions for people using walkers or wheelchairs. Program areas and the cafeteria also have an abundance of natural lighting allowing for easy transitions from one space to another. Program spaces allow for ample work space and small side rooms to use for relaxation, therapies or small group activities. One of the large work spaces has belt lines and other machines required to

assemble and package a wide array of work products. Prior to any individual's use of a machine or a tool that has the capacity to injure, they will be given training on proper use of the tool or machine. This access to machines and tools that can be hazardous shall be addressed in the individual's Individual Abuse Prevention Plan. There are other large program spaces that are divided into smaller work/activity areas to meet individual's needs. It is very flexible space that can be repurposed based upon the unique needs that each day presents. The building has fire alarms, has a sprinkler system throughout and has a concrete roof making it very safe during inclement weather such as thunderstorms and tornados. The building has been designed with three outdoor spaces for people to enjoy the fresh air. The courtyard is in the middle of the building and can be accessed through 4 different areas of the building. A patio area is located to the west of the building for program areas near it. Each of these spaces has a fence around it with a latched gate(s) so that people can safely participate in these areas. There are windows overlooking these two outdoor spaces so supervision can be provided from within the building in addition to staff in the outdoor spaces. A third outdoor space on the North East side of the building has a cement pad that allows for activities such as basketball. When driving around the building, there are 2 entry ways to each program area allowing for safe and convenient arrivals and departures for program participants.

2. What specific measures has the program taken to minimize the risk of abuse to people as related to the condition and design of the facility in terms of safety for people receiving services?

MRCI East Park regularly trains staff and clients in the safe use of tools, machinery and resources within the building. Regular emergency drills (i.e., fire, medical, intruder, etc.) are completed, monitored and critiqued for efficient performance.

In the case of an event that prevents staff and clients from re-entering the building, MRCI's Transportation Manager will be called (about 15 minutes away at the Map Drive building) and asked that they send up to 5 busses to transport clients and staff to the Map Drive site to finish out their day. Residential staff will be contacted so they know about the situation and where to pick people up that day.

3. Describe any areas of the facility that are difficult to supervise:

It can be difficult to monitor the front reception area, the warehouse, the bathrooms that are not in the program areas and the smoking areas on the two ends of the building as there are not program staff present in these areas throughout the day. The cafeteria and hallways are difficult to supervise during specific times throughout the day as staff are not present during non-break times.

4. What specific measures has the program taken to minimize the risk of abuse to people as related to the areas of the facility that are difficult to supervise?

While there are areas within the licensed space that may be difficult to monitor, the layout is formatted to reduce these areas to a minimum, and staff are aware of the areas and frequently monitor them. Individuals are trained in and approved for the safe and independent use and accessing of the areas outside of the licensed space (office, warehouse and smoking). While these areas are monitored closely by staff, if any individual is found to have broken the trust and/or rules around independently accessing those areas, an interruption from independent access shall be given, for a duration to be determined by MRCI, in conjunction with the individual's Service Team.

ENVIRONMENTAL ASSESSMENT:

1. Describe the location of the facility including information about the neighborhood and community that the facility is located:

MRCI East Park is a 32,000 square foot building in the Eastwood Industrial Park in Mankato. Traffic on Energy Drive is limited at this time as there are only two other businesses on it. As this industrial area grows, traffic will increase. There is a public sidewalk on the East side of Energy Drive. The

building is currently surrounded on three sides by farm fields and a Fed Ex building to the North. It is expected that this industrial park will grow as the Mankato area expands.

2. What specific measures has the program taken to minimize the risk of abuse to people as related to the location of the facility, including factors about the neighborhood and community?

MRCI East Park has an emergency plan that all staff are trained on (according to their required need to understand and implement). All individuals receive a hybrid version training of this plan to fully orient each individual to the greatest degree, according to their cognitive ability. All of this training is designed to minimize the potential of harm to people providing and receiving services, as that relates to the location of the site.

3. Describe the type of grounds and terrain that surround the facility:

MRCI East Park is located to the West of Energy Drive. It has a driveway that surrounds the building on the South, West and North sides. Parking lots lie on the east and west sides of the building. There is a parking area for busses to the West of the building. Busses load and unload clientele onto sidewalks on the East, South and West sides of the program area. Out the main entrance on the East side of the building and around the corner to the North is one smoking area. The other smoking area is on the North West side of the building near the loading docks. On the South side of the building is a fenced in courtyard that can be accessed from 2 program areas and the cafeteria. To the West of the building is a fenced in courtyard area with 2 pergolas, a sidewalk and benches. A third outdoor space on the North East side of the building has a cement pad for recreational use. Only individuals that have demonstrated proper safety skills are allowed to independently access these areas.

4. What specific measures has the program taken to minimize the risk of abuse to people as related to the type of grounds and terrain that surround the facility?

At orientation, all individuals receive training on the safe use of the grounds and the extensions thereof. MRCI has an emergency plan on staff actions to take in the case of an event related to the inappropriate accessing of those areas (e.g., lost client search protocols).

5. Describe the type of internal programming provided at the program:

MRCI East Park provides programming in the following areas: skills to complete vocational tasks in-house and in the community; soft skills to be a valuable employee; personal cares such as activities of daily living; social skills; leisure experiences; sensory activities; community integration skills; and educational curriculum.

6. What specific measures has the program taken to minimize the risk of abuse to people through the type of internal programming provided at the program?

Staff are trained on each individual's programming needs when they first start, every year from then on and when changes are made. MRCI trains all staff annually in the Maltreatment of Vulnerable Adults Act. Any MRCI staff having knowledge of an incident of suspected maltreatment of a vulnerable adult, will make a report either internally or externally. The reporter shall follow the procedure outlined in the policy regarding reporting of suspected maltreatment of clients.

7. Describe the program's staffing pattern:

MRCI East Park provides the level of direct service support staff, supervision, assistance, and training necessary to ensure the health, safety, and protection of rights of each individual; and to be able to implement the responsibilities assigned to the license holder in each individual's coordinated service and support plan or identified in the coordinated service and support plan addendum, according to the requirements of chapter 245D. Each individual has a staff ratio determined by their service team and the required level of staffing is provided. The rule requires that a minimum staffing

ratio of 1:10 is provided, unless the team agrees to a higher ratio; this would be documented in their coordinated service and support plan addendum and staff ratio form.

8. What specific measures has the program taken to minimize the risk of abuse to people through the program's staffing pattern?

Providing the staffing patterns indicated on an individual basis by the DHS Service Need Ratio Form (as determined by the Service Team), adequately provides for proper supervision and supports for training. This staff ratio provides for the skill enhancement, program efficacy and for safety and adaptive skill training. MRCI trains all staff annually in the Maltreatment of Vulnerable Adults Act. As a company, MRCI takes our responsibility to protect our clientele from abuse and neglect very seriously. We also firmly believe that by training clientele in self-advocacy, rights and responsibilities, that their ability to participate in their own safety management is improved.



Duane Olenius, MRCI Board President

August 5, 2019
Date

The review occurred at least on an annual basis.

The review of the plan used the assessment factors in the plan and any substantiated maltreatment findings that occurred since the last review. If necessary, the plan was revised to reflect the review results.

Legal Authority: Minn. Stat. § 245A.65, subd. 2