

Program Abuse Prevention Plan



Program:	MRCI - Fairmont	
Address:	701 Cory lane	
	Fairmont, MN 56031	
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 WorkSource Fairmont is licensed for ages 18 and older who 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 WorkSource Fairmont is also licensed to serve people who are funded via the CADI and BI waiver, whose presenting disability may include mental health and/or physical disabilities. The actual age of clientele on site will fit within this range.

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?

MRCI trains all staff annually in the Vulnerable Adult Act (VAA). 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), the staff of each MRCI Site will receive special training related to age discrimination. 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 which complies with the procedures outlined in the VAA.

3. Gender of persons receiving services:

MRCI serves both male and female clientele.

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

All staff are trained in providing the most gender specific programming feasible, if relevant. Any MRCI staff having knowledge of an incident of suspected maltreatment of a vulnerable adult – regardless of gender - 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 which complies with the procedures outlined in the VAA as requested (e.g. by an employee of that site) and/or needed (e.g. by the Service Plan of an individual client), the staff of each MRCI Site will receive special training related to age discrimination. 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.

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

MRCI WorkSource Fairmont specializes in providing services that are tailored to meet the individual needs of a wide range of clientele. Specialized training is provided to the persons receiving services in the areas of communication, visual problems, behavior management, activities of daily living, safety, motor development, social skills, and transportation. 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.

Fairmont is a site that has evolved to meet the local needs related from profound to mild cognitive functioning, and a wide array of mental health challenges that impair ones activities of daily functioning. It has been determined by the Local Governing Authority (typically the counties of concurrence Faribault and Martin) that MRCI WorkSource Fairmont's Day Services Facility serves clientele with exceptional needs such as Autism, Brain Injury, Physical disabilities, Mental Health challenges, and Intellectual/Developmental Disabilities, etc.

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?

MRCI trains all staff annually in the VAA. As a company, MRCI takes our responsibility to insulate our clientele from abuse and neglect very seriously. Any MRCI staff having knowledge of an incident of suspected maltreatment (abuse, neglect or exploitation) 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 which complies with the procedures outlined in the VAA. Specialized training is provided to the persons receiving services in the areas of communication, visual problems, behavior management, activities of daily living, safety, motor development, social skills, and transportation. Training is provided on an individual basis when more detailed or specialized instruction is indicated, or as areas of vulnerability arise or recur, or as so directed within the individuals Service Plan. 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.

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

MRCI WorkSource Fairmont serves a wide range of clientele with varying emotional and physical challenges to effective and efficient daily functioning. At Fairmont, most clientele are ambulatory – although there are typically _three_ enrollees that use assistance. Fairmont has evolved a “specialty service” to provide services to people who have significant physical challenges, including the needs to use canes, walkers, and/or wheelchairs. Some clientele are not healthy physically, and/or are unstable medically and/or mobility-wise, and/or may present with emotional challenges. These clientele may be on various programming initiatives that MRCI may, or may not, track and/or provide active programming for. Fairmont is a site that has evolved to meet the local needs as determined by the Local Governing Authority (Martin and Faribault counties– the entity of concurrence), and serves clientele with individually tailored services that present with challenges related to their specific disability.

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?

MRCI trains all staff annually in the VAA. As a company, MRCI takes our responsibility to insulate our clientele from abuse and neglect very seriously. As requested (e.g. by an employee of that site) and/or needed (e.g. by the Individual Service Plan/CSSP Addendum of an individual client), the staff providing services at any MRCI Site will receive special training related to meeting the needs of persons with physical and emotional health disabilities. Specialized training is provided to the persons 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.

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

MRCI WorkSource Fairmont provides services to people whose skills range from no functional self-cares or self-preservation, to living independently and driving. MRCI provides services to people whose challenging behavior ranges from none at all, to low level interactional and/or interpersonal social skills and/or personality disorders and/or deficits, to aggression to self and/or others and/or property with or without objects, significant Self- Injury, elopement, and other dangerous behaviors.

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?

Specialized training is provided to the staff providing services and to the persons 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, 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 to 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.

Fairmont is a site that has evolved to meet the local needs as determined by the Local County Governing Authority, Martin and Faribault counties, and serves more than a dozen clientele that present with significant and/or sporadic behavioral challenges.

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

Each client's team determines the degree of specialized programs that each client may require. If so determined, MRCI will provide the training to staff required to provide the proper services.

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?

MRCI WorkSource Fairmont specializes in providing services that are tailored to meet the individual specialized needs of a wide range of clientele, with a strong focus on Employment. Yet the Fairmont site can and does meet the needs of a very broad range of clientele who have significant mental functioning and physical capacity issues. Fairmont also has specific programming and vocational options that are best served for a narrower "functioning band" of clientele. Specialized training is provided to the staff persons providing and clientele receiving services in the areas of communication, visual problems, behavior management and activities of daily living, safety, motor development, social skills, and transportation. 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. We also believe that by training clientele in self-advocacy, rights and responsibilities, that their ability to participate in their own safety management is improved.

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

Each individual's team meets regularly, and if determined by the services needs as stated in the clients Individual Service Plan/CSSP Addendum, the Team will provide direction as to how MRCI need meet the needs of the individual, including any relevant staff training as indicated.

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?(Any substantiated maltreatment findings that occurred since the last review. June 2018- June 2019)

MRCI Fairmont provides services that are tailored to meet the individual needs as stated in each client's service plan. MRCI Fairmont does meet the needs of a very broad range of clientele. We have specific programming and vocational options that are best served for a wide array and "functioning band" of clientele. As directed, specialized training/programming will be provided to the persons receiving services in the areas of communication, visual problems, behavior management, activities of daily living, safety, motor development, social skills, and transportation. 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.

Fairmont is a site that has evolved to meet the local needs as determined by the Local Governing Authority (Martin and Faribault counties Social Services), and serves many clientele that present with challenges related to their various diagnosed conditions.

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

15. Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to people receiving services: (Were there any revisions made to reflect review results.)

MRCI WorkSource Fairmont staff participate in the construction of an Individual Abuse Prevention Plan for every client enrolled in a Licensed Program, and retains that/those documents for each client 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 actionable plans to minimize that abuse/neglect. MRCI WorkSource Fairmont also retains all client related records of abuse that are relevant to minimizing the risk of abuse to clientele, and use this as a primary teaching tool for awareness of individual vulnerabilities to abuse. MRCI WorkSource Fairmont retains all records *that we have* "on file" related to abuse/neglect, and includes those events and records as a part of the

individual clients file. It is MRCI's intention that Staff are oriented to relevant, client specific, records as a part of their initial and ongoing training. Client competency training for all individuals in licensed services is completed annually. 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 clients IAPP/CSSP-Addendum.

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 Fairmont participate in the construction of an Individual Abuse Prevention Plan for every client 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 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 Program Site at 701 Cory Lane, Fairmont, MN is designed to provide safe and functional space for the clientele and staff using the site as a Habilitation//Vocational Training/Employment Center, to maximize the "program" space (areas so designated for "classes," Habilitation and/or Therapy), while still allowing for essential "vocational" space (including warehouse), to provide for other related needs (e.g., work and lunch breaks, small group activities, areas for relaxation, etc.), and to be able to "flex" these space parameters based upon the unique needs that each day presents. On a regular basis, there is use of items (machines and tools) that could be dangerous, if misused. Prior to any person's use of a machine or a tool that has the capacity to injure; even only if misused, the person shall be afforded a training on proper use of the tool or machine. This site utilizes the following equipment both DT&H and Extended Employment work space; pallet lifts; pallet jacks, heat shrink tunnels, L-bar sealers; belts. The EE program also utilizes a rotary blister machine on rare occasions. The forklift is not accessed by clients. This access to machines and tools that can be hazardous shall be addressed in the clients Individual Abuse Prevention Plan, the person Coordinated Service and Support Plan Addendum and within this Program Abuse Prevention Plan. The site has an auditory, not visual Fire Alarm, but is not sprinkled. In case of a fire – or other event that requires evacuation of the building, the site has an emergency drill/action plan. It should be used to alert all clients and staff that an evacuation is required. Staff and clients have trained on safe and orderly evacuation out all exits. There is a Fire Hydrant within about 150 feet north east of the front entrance of MRCI. Fire and Rescue personnel will typically be directed to the front door for access to the site, but if circumstances demand (as determined by the supervisor in charge of "managing" the event). If the front door cannot be accessed, the Fire /Rescue personnel will be directed to an appropriate doors - east door is main taxi drop off entrance. If there is an event that requires the total evacuation, and the site cannot be safely reentered, please see the plan entitled: "Natural and Un-Natural Disaster Emergency Procedures

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 Fairmont regularly trains staff and clients in the safe use of tools, machinery and resources within the building. We provide for the use of quarterly fire drills to ensure the safety of clients and staff and rehearse evacuation of the premises. Regular emergency (i.e. fire, medical, intruder, etc.) drills are also completed, monitored and tracked. Tornado or severe drills are done in applicable seasons.

MRCI Fairmont has a 3 member Emergency Response Team on site. These individuals have been trained and certified as 1st Responders by Cale Sandstrom, MRCI Safety Coordinator

In the case of an event that prevents staff and clients from re-entering the building, an MRCI Executive/Administrator will be brought into the discussion, and the "Natural and Un-Natural Disaster Emergency Procedures" will be implemented.

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

The areas near the lockers can be difficult to monitor. The bathrooms can be difficult to monitor. The warehouse can be difficult to monitor. The garage area can be difficult to monitor. The designated smoking areas on the east side entrance or south patio can be difficult to monitor. The west side of the parking lot where recycling dumpsters are located can be difficult to monitor.

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 in the licensed space that may be difficult to monitor, staff are aware of these areas and frequently check them. Clients are trained in, and approved for the safe and independent use and accessing of the areas outside of the licensed space (i.e. office, garage, warehouse, and designated smoking areas). These areas are not monitored as closely by staff. However if any client is found to have broken the trust and/or safety rules around independently accessing those areas, independent access shall be limited for a duration to be determined by MRCI, in conjunction with the clients interdisciplinary service team.

ENVIRONMENTAL ASSESSMENT:

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

MRCI Fairmont occupies approximately 15,283 square feet in a wholly owned and stand-alone building in the Industrial Park in Fairmont, MN. STEP, Inc., a tenant, occupies the remaining portion of the building. The parking lot traverses across the north and east side of the parking lot. A frontage road, Cory Lane runs north and south, parallel to the east side of parking area. Taxis/busses load and unload clientele at the east entrance. Traffic on County Road 26 is steady during the week with semi-trucks, which haul to and from several businesses residing in the Industrial Park, as well as connecting to Interstate 90 and or City of Fairmont. County Road 26 passes in front (about 300 yards) of the MRCI site running east to west.

The east entrance is the loading/unloading area for taxis and/or residential drop-offs. The loading dock is on the north side of the building. This is primarily used by trucking companies picking up or delivery product to the MRCI warehouse. The front entrance to the building is used for visitors and residential pick-ups/drop offs. HogSlat is located directly east and Kahler Automation is across to the north of MRCI.

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 Fairmont has an emergency plan that all staff are trained on (according to their required need to understand and implement). All clients receive a hybrid version training of this plan to fully orient each person 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 Fairmont is in the Industrial Park in Fairmont, MN. Truck and auto traffic (described in #1 above). County Road 26, a two lane road, runs east and west. South, east, and west is farmland (i.e. corn and soybeans). Full grown corn can impinge visibility.

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 clientele receive training on the safe use of our 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). **IN THE CASE OF AN EVACUATION, ALL CLIENTS AND STAFF ARE TO EVACUATE THE BUILDING ACCORDING TO THE EGRESS MAPS (OUT THE FRONT DOOR, CROSS THE PARKING LOTS WITH STAFF DIRECTION, AND GO TO THE GARAGE AREA SOUTH OF THE MAIN BUILDING. A COUNT WILL BE TAKEN AND COMPARED TO THE ROSTER IN ATTENDANCE FOR THE DAY. IN THE CASE OF A FIRE BLOCKING PRIMARY EXITS, THE SECONDARY EXIT, AS INDICATED ON THE EGRESS MAPS, WILL BE ACCESSED. THE SAFE AREA IS ACROSS THE ROAD TO THE EAST OF THE PARKING AREA AT HOGSLAT.**

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

MRCI WorkSource Fairmont works with individuals to develop and maintain life skills. These include in-center habilitation and enrichment; sensory activities; communication training; center-based and community based paid employment experiences; social skills training; soft skills training; social media use and security. Individuals participate in integrated community life activities, if it is their desire. Most if not all individuals are involved in employment and related activities and/or engaging in proactive and satisfying activities of their own choosing. This may also involve vocational experiences; community employment twining; understanding and improving one's personal support network; accessing supported employment services; and transportation skills training.

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 client's programming needs when they are first employed and every year after that. MRCI trains all staff annually in the Vulnerable Adult Act (VAA). 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 which complies with the procedures outlined in the VAA.

7. Describe the program's staffing pattern:

MRCI WorkSource Fairmont provides the level of direct service support staff, supervision, assistance, and training necessary to ensure the health, safety, and protection of rights of each person; and to be able to implement the responsibilities assigned to the license holder in each person's coordinated service and support plan or identified in the coordinated service and support plan addendum, according to the requirements of chapter 245D. In general, this means that we staff at no less than a 1:10 ratio for people enrolled in our DTH and Pre-Voc services, although if a team agrees that a specific client can be staffed at a ratio of up to 1:25 that should be included on the CSSP Addendum and on the Staff Ratio form.

MRCI supplies the staffing necessary to insulate clients from abuse/neglect, as well as to provide the most supporting environment to develop and maintain life skills, participate in community life and engaging in proactive and satisfying activities of their own choosing. In general, this means at least 1:10 staffing for our DD Waiver clients, with DHS RMS system being used to generate proper "staff ratios" for individual clients. Service Need ratios are typically provided for proper supervision and training as determined by the clients "Team", and these ratios are established for training, skill enhancement, program efficacy and maintenance of appropriate staffing for individual client safety and adaptive skill building.

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 building. MRCI trains all staff annually in the VAA. As a company, MRCI takes our responsibility to insulate our clientele from abuse, neglect and maltreatment 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

Aug 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