



### Program Abuse Prevention Plan

Program:	MRCI New Ulm DT&H
Address:	2100 North Broadway New Ulm, MN 56073
Date Plan Developed	8/2014
Date Revised	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:

*Clients currently served are between the ages of 19 and 75.*

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 that site) and/or as needed (e.g. by the Service Plan of an individual client), the staff 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 clients.*

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 will receive special training related to gender discrimination. When personal cares are needed, the same gender staff will help the individuals whenever possible. MRCI staff and clients will receive training on current sexuality topics to teach about appropriate behaviors and attitudes.*

*MRCI staff firmly believe that by training clientele in self-advocacy and rights and responsibilities their ability to participate in their own safety management is improved. Staff model appropriate behaviors such as hand shakes, pats on the back, etc., followed by providing feedback to individuals to promote healthy relationships. Staff provide respectful attitudes and proper/careful personal cares application to clients in the most professional and autonomous ways possible.*

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

*The clients served range from mild to severe intellectual disabilities. Communication modes range from communicating through full verbal sentences to two-three word phrases. There is a wide range of abilities from being able to meet their own personal care needs to needing staff to complete tasks for them.*

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?

*Staff have been trained on the degrees/levels of diagnosis of developmental and intellectual disabilities and what can be expected per diagnosis, in general, and specifically to each individual.*

*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 individual's 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:

*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, autism, cerebral palsy, deafness, non-verbal, dementia, depression, diabetes, Down's Syndrome, hearing loss, heart defects, hepatitis B, friedreich's ataxia, personality disorders, obesity, OCD, osteoarthritis, post-traumatic stress disorder, oral apraxia, seizures, hydrocephalic (shunts), and TBI.*

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 protect 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 Service Plan of an individual client), the staff providing services 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 bases 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 have been trained on the degrees/levels or diagnosis of physical and intellectual disabilities and what can be expected per diagnoses in general, and specifically to each individual. Staff are oriented, trained and supervised in the application of therapies such physical therapy, occupational therapy, medical administration, when to call the residential nurse or 911, and their Individual Abuse Prevention Plans. Staff are trained in the proper use of assistive devices and safety techniques to prevent injury or harm, proactive interventions to de-escalate undesirable behaviors and, if needed, emergency use of manual restraints to protect the specific individual or others. Each program area has a trained emergency response team to meet the unexpected medical needs of individuals and to determine at what point emergency personnel will be contacted. MRCI has a full-time safety coordinator that will evaluate situations that appear to be less than safe and will make suggestions of possible solutions.*

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 at all. Some individuals require interventions such as modeling and verbal reminders as a means to redirect them to appropriate coping strategies. Some people are able to fully communicate verbally both expressively and receptively. Many people require some level of assistance with communication and appropriate assertiveness. Some individuals are completely non-verbal and communicate through using a talking device or written messages. 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 ma/adaptive 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 not limited to yelling, crying, swearing, spitting, swatting, hitting, and throwing objects to harm self or others. These areas are further described in each person'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?

*In order to reduce the potential of abuse and/or harm to the clients served, all staff are trained on Rights of Persons Served. Clients are unable to communicate all of their wants or needs so staff are expected to respond quickly as indicated in each individual's Individual Abusive Prevention Plan and Service Outcomes. Staff are trained to take proactive measures to ensure each client's needs and preferences are being met, to ensure the clients are receiving proper care and are comfortable and able to participate in their daily routines as they prefer to. Staff are trained to do this by providing positive and encouraging feedback to all appropriate behavior and by respecting the choices of the individual. Specifically, staff are trained on giving the clients options to choose from, time to respond, and by ensuring consistency to the routine so that the clients know what to expect. Consistencies proven to alleviate stress and to increase accessibility and accuracy in communication.*

*Some clients have therapeutic use of medication to assist them with controlling maladaptive behavior. This treatment has been prescribed by professional medical services. MRCI staff provide*

*information/data to residential staff and/or professional medical staff to monitor the effectiveness of the medication.*

*Some clients have a specific goal area implemented to help teach them how to appropriately respond to stimulus and/or how to process information without becoming frustrated, and/or how to communicate wants or needs. Staff are trained on these annually and/or if any changes are made to the plan.*

*MRCI trains all staff annually in the VAA. 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.*

*The Internal Review Committee reviews all reported emergency use of manual restraints. They follow state and federal guidelines required for reporting maltreatment and vulnerable adult issues.*

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

*Programming at MRCI New Ulm focuses on teaching self-help skills, communication modes, social skills, cognitive and adaptive skills, domestic skills, community integration and leisure time programs.. 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 a 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 clients 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 clients 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 teaming of 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, CPR, Safe Lifting, Medication Administration Fire Prevention, Mandt and other annual trainings listed in MRCI staff training documents. MRCI New Ulm 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 takes 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 (OHS).*

*Specific medical training for staff at MRCI New Ulm is based on client specified services which include but are not limited to administering medication and treatments such as preparing food as ordered by physicians and assisting client at walking for exercise. Staff are trained on client specified allergies, seizure protocol, choking, and chronic medical conditions; are able to identify symptoms and prevent further symptoms by 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 use of transfer belts and each individual's personal equipment such as wheelchairs, walkers, and toothbrushes.*

*MRCI New Ulm also has an Emergency Response Team on site.*

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 clients served. MRCI staff are trained and oriented in the items required by MN Statutes, Chapter 2450; and on the above responsibilities in a specific sequential order to maximize competency. Training and orientation requires staff to read and comprehend materials 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 Resources staff. Specific safety training pertaining to MRCI New Ulm 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 New Ulm to ensure the building is up to regulatory code and procedural drills are being completed by staff.*

*All 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 are regulated by licensing requirements of Department of Human Services (OHS). 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:

*MRCI New Ulm staff participates in the construction of an Individual Abuse Prevention Plan, and retains that 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. Each MRCI site 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.*

16. What specific measures has the program taken to minimize the risk of abuse to people as related to the knowledge of previous abuse?

*By retaining all client related records of abuse that are relevant to minimizing the risk of abuse to clientele, and using this information as a primary teaching tool for staff awareness of individual vulnerabilities to previous abuse, MRCI takes all reasonable and expected steps to reduce the potential of abuse and/or harm to clientele enrolled in our day program services. We believe that by training clientele in self-awareness, self-advocacy, rights and responsibilities, that their ability to participate in their own safety management is improved.*

## **PHYSICAL PLANT ASSESSMENT:**

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

*The MRCI New Ulm program site at 2100 North Broadway is located in an industrial area at the North side of New Ulm. The setting is a workshop area at the site with a work productivity space. The program was designed to provide a safe and functional space for the clientele and staff using the site. The building was designed with open areas to allow for safe transitions for people using walkers or wheelchairs. Program areas and the lunchroom also have an abundance of natural lighting allowing for easy transitions from one space to another. Program spaces allow for ample work space for clients and small side rooms to meet individual's needs. The large work space has a belt line to place assembled work products on prior to placing the product in shippers. Prior to any person's use of a machine or a tool that has the capacity to injure, the person 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 client's Individual Abuse Prevention Plan. There are other program spaces that are divided into smaller work/activity areas to meet individual's needs. It is a very flexible space that can be repurposed based upon the unique needs that each day presents. The building has fire alarms and protected areas (free from windows) to increase the safety of clients during inclement weather such as thunderstorms and tomados. A park area is located to the west of the building for people to enjoy the fresh air. Only clients who have demonstrated proper safety skills are allowed to independently access this area. Other clients can access the park area with staff for their safety. When driving on the West and South sides of the building, there are 2 entry ways to the DT&H Program and 1 entry way to the lunchroom to allow 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 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, they will gather in the J&R Schugel Trucking parking lot, located on the South side of MRCI. They could also take shelter there while waiting for transportation. Residential staff will be contacted so they know about the situation and where to pick individuals 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 area in front of the building.*

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. Clients are trained 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 client is found to have broken the trust and/or rules around independently accessing those areas, a suspension from independent access shall be given, for a duration to be determined by MRCI, in conjunction with the client'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 New Ulm is located in an industrial area that has heavy traffic at certain times during the day. There is a public sidewalk on the West side of the building.*

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 New Ulm 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 New Ulm is located to the East side of North Broadway. Parking lots are adjacent to the East and South sides of the building. Busses and vans load and unload clientele on the West and South sides of MRCI. Out the door on the West side of the building is the smoking area. To the East of MRCI's building is a park area with picnic tables. Only clients 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 clientele 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 New Ulm 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 and daily living skills; social skills; leisure experiences; 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 client's programming needs when they first start and every year from then on. 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 New Ulm 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 2450. Each client has a staff ratio form completed 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 OHS 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 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.*

*For the period of June 2015 through September 2016 there were no substantiated reports of possible maltreatment of a vulnerable adult served at the MRCI New Ulm location.*



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.