



Program Abuse Prevention Plan

Program:	MRCI Rosemount	
Address:	15191 Boulder Ct	
	Rosemount	
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 Rosemount is licensed for ages 18 and older. Clients currently served are between the ages of 20 and 70.

- 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) and the Maltreatment of Minors Act, and uses the MAARC (MN Adult Abuse Reporting Center) system for Adult reports. 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. In addition, 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), the staff of MRCI Rosemount will receive special training related to age discrimination.

- 3. Gender of persons receiving services:

MRCI Rosemount 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 or CSSP-Addendum of an individual client), the staff of each MRCI Site will receive special training related to age discrimination as well as gender identity, conditions, and discrimination if deemed necessary. 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 Rosemount site specializes in providing services that are tailored to meet the individual needs of a wide range of clientele and can meet the needs of a very broad range of clientele that is tailored and specific to their mental functioning and physical capacity. Rosemount has specific programming and vocational options that are best served for a wide "functioning band" of clientele--from Profound Developmental issues through Severe, Mild, Moderate and "borderline DD, through to ASD, Physical Challenges, Brain Injury, Mental Illness and Serious and Persistent Mental Illness (SMPI).

Rosemount 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 county of concurrence) that MRCI's Rosemount Day Services Facility serves clientele that have exceptional needs such as Autism, 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 and the MAARC System. As a company, MRCI takes our responsibility to insulate our clientele from abuse and neglect very seriously. Each staff is oriented into Person Centered Planning and Dignity of Risk, and how those two concepts can conflict. We advocate on behalf of our clients while at the same time are ever aware of and supportive of their vulnerabilities. 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 as deemed necessary or requested. Training is provided on an individual basis when more detailed or specialized instruction is indicated (e.g., as in the persons SMA or CSSP-Addendum), 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 Rosemount serves a wide range of clientele with varying emotional and physical challenges. Most clientele are ambulatory - although there are typically nearly two dozen enrollees that use assistance such as wheelchairs and walkers. Rosemount is equipped to provide services to people who have significant physical challenges, including the need to use canes, walkers, and/or wheelchairs. Some clientele are not healthy physically, and/or are unstable medically (e.g., Prader -

Willi Syndrome) and/or mentally (co-morbid) and/or mobility-wise, and/or may present with emotional challenges. The clientele may be on various programming initiatives (exercise, Range of Motion, wise food intakes, smoking cessation, etc.) that MRCI may, or may not track and/or provide active programming for.

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. If an individual requires physical or emotional supports, MRCI will train all staff providing that support service to that person with the proper training, and then document said training as meeting standards as demonstrated by an observed skill assessment.

As requested (e.g. by an employee of that site, or a member of the service recipients "Team"), 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, vocationally relevant topics, mental health, and behavior management, activities of daily living, safety, motor development and social skills. This list is not totally inclusive since trainings are 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, 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 Rosemount 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 (physical and/or emotional) 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 from area and/or building, and other behaviors that are either disruptive and/or dangerous to the person, their peers, staff, community members and/or community resources.

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, etc. 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. MRCI uses the MANDT system and all staff are trained according to MANDT standards (for both physical and emotional supports). Staff training has a strong focus on de-escalation instruction and focuses 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 persons style of learning and their compatibility with others.

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. We view EACH AND EVERY participant in our program as a unique individual, each with the need for some sort of specialized programming. Some clientele require VERY specialized programming, as

determined by their team. 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 Rosemount 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. 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 that have had a criminal background study and have been trained on MRCI's policies and procedures related to specialized programs of care. Rosemount can - and does - meet the needs of a very broad range of clientele who have significant behavioral, support, mental functioning and physical capacity issues. Rosemount also has specific programming and vocational options that are best served for both a broad range of abilities, as well as a narrower "functioning band" of clientele. Specialized training is provided to the staff persons providing and clientele receiving services in the areas of vocational training, expressive and receptive 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.

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

Each individual's team meets regularly, and if determined by the service needs as stated in the clients Individual Service Plan/CSSP Addendum, the team will provide direction as to how MRCI will meet the needs of the individual, including any relevant staff training as indicated. MRCI Rosemount also contracts with Health Counseling Service to provide specific and relevant training to staff, within which the skills trained are demonstrated and documented.

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?

MRCI Rosemount provides services that are tailored to meet the individual needs as stated in each client's service plans. MRCI Rosemount 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 - AND THEIR STAFF - in the areas of communication, visual problems, behavior management, activities of daily living, safety, motor development, vocational supports, 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.

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-Rosemount from July 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? (Any revisions made to reflect review results.)

Staff at MRCI Rosemount 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 include

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 Rosemount site at 15191 Boulder Ct was designed and built specifically for the needs of MRCI and its clientele. It is designed to provide safe and functional space for the clientele and staff using the site as a Habilitation/Enrichment/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 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/or within this Program Abuse Prevention Plan.

The site has a 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 of the MRCI front entrance.

There are fire extinguishers throughout the building in compliance with the MN Fire Marshall. 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 two front doors cannot be accessed, the Fire /Rescue personnel will be directed to an appropriate side door.

In the event of other emergencies (e.g., gas, water, weather, tornado, intruder, etc) MRCI Rosemount practices our response both in classroom settings as well as in operations responses and other drills.

There are areas outside of the building that are enclosed for the safety of those clients for whom self-direction is an issue. In addition, the entire campus is surrounded by its drive-around driveway in such a manner to provide a natural impediment to elopement.

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

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 following areas can be difficult to supervise/monitor: front offices; areas near the lockers; bathrooms; the warehouse area; the smoking area out the side entrance; offices and med rooms, which when unoccupied are typically locked, can also 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, 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 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 clients 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. If a particular clientele is found to have broken this trust and/or access rules repeatedly, or without due cause, their staffing ratio may be heightened, and a suspension from program may result. Regular breaking of trust and rules may result in a temporary interruption or permanent termination of service (always according to MN Rules).

ENVIRONMENTAL ASSESSMENT:

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

MRCI Rosemount occupies approximately 25,000 square feet in a wholly owned and stand-alone building in an Industrial park on the Southeast end of downtown. Rosemount is a mid-sized town of 25,000 in the county of Dakota, a thriving county that is the third largest in MN. MRCI has a relatively long, vibrant, positive and rich history with the City Administration, local businesses, the Chamber of Commerce in Dakota County and the local schools.

The parking lot traverses around the entire complex. Buses load and unload clientele to and from all entrances. Traffic on Boulder Court is very light; the bulk of traffic being for MRCI related business, and with very infrequent semi-trucks traffic - again - primarily for MRCI deliveries. As the MRCI site is near (about 300 yards) from the corner of MN Highway 3 and County Road 42, and car and truck traffic at that controlled intersection is very high. That intersection is considered very dangerous and has been determined to pose significantly risk for clients to endanger themselves if they fail to use safe street crossing skills. MRCI Rosemount staff and clients RARELY cross that intersection on foot for programmatic purposes. Just before the 3 and 42 intersection are the railroad tracks (as near as 50 yards from our facility and as far as 250 yards from our facility), that are used regularly. Directly north of our facility, also about 250 yards away is the East-West Cty 42, a very busy road.

Out the south side door is the smoking section and the loading dock.

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 Rosemount 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 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. We have also brought in local businesses and Rosemount Police to affirm

our mutual resolve to meet the needs and minimize the likelihood of abuse as it relates to the location of our facility.

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

MRCI Rosemount is in an Industrial Park on the South East end of downtown Rosemount. As such there are concerns with train, truck and auto traffic (described in (1) above). To the West is a train track line that is frequently used. Further west of the tracks is MN Hwy 3. To the north is Cty 42 and across the street to the east is large manufacturer warehouse-type facility. South are farm fields. East is the Business Park.

MRCI owns approximately 3 acres on the north side out the building - before Cty 42. It is an open field currently.

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?

The MRCI site has been conceived of, planned and built to specifically meet the needs of the clients we serve. As such, design has been made that minimizes such risk. 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 settle on the grassy knolls outside of the parking and driveway areas. 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/parking areas to the grassy areas.

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

To develop and maintain life skills (in-center habilitation, extensive community based vocational supports; enrichment and sensory; communication training; and center-based and community based paid employment experiences; social skills improvements; soft skill training), participate in integrated community life (activities in community for those desiring, employment and related activities for most-if not all), and engaging in proactive and satisfying activities of their own choosing this may also involve vocational experiences; community employment training; understanding and improving one's personal support network; accessing supported employment services; and transportation skills training.

We engage our clientele in classroom and hands-on training to meet the needs and training style of the client.

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?

All regular staff are trained annually, or when changes occur, on each person's support plan (e.g. CSSP Addendum, Self-Management Assessment and Individual Abuse Prevention Plan), which includes information on specialized programs, interests and preferences. Staff are trained to encourage the highest level of independence for the individuals served. All staff are trained in First Aid, some are trained in CPR and AED, and a select few staff are members of the Rosemount Emergency Response Team. The emergency response team has advanced training to intervene in emergency situations. 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.

7. Describe the program's staffing pattern:

MRCI 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 provide staff at the Teams Direction (of 1:1, 1:2, 1:4, 1:6 or 1:8), and no less than a 1:10 ratio for people enrolled in our DTH and Pre-Voc services. We currently have approximately 30 direct staff for approximately 150 clients on the "center-based" services roster.

MRCI supplies the staffing necessary to insulate clients from abuse/neglect, 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 Waiver clients, with DHS RMS system being used to generate proper "staff ratio's" 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 at intake or upon needed changes) 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