

Program Abuse Prevention Plan



Program:	MRCI Shakopee	
Address:	5244 Valley Industrial Blvd. S	
	Shakopee MN 55379	
Date plan developed:	6/24/14	Revision 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 Shakopee supports individuals between the ages of 20 and 80.

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 premises at all times when individuals are present. MRCI trains all new staff within 72 hours of hire and all staff annually in the Vulnerable Adult Act. 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 Shakopee serves male, female and transgender individuals.

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 Shakopee has separate male and female restrooms as well as two single person (non-gender specific) 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 Shakopee have a diagnosis of developmental disability (based on the psychological report) or a related condition in MN Statute 9525.1500 Subpart 27 including cerebral palsy, epilepsy, autism, mental illness 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 Shakopee 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 includes but is not limited to communication, visual cues, positive behavior support, social skills, vocational skills, etc.

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 individuals which complies with the procedures outlined in the VAA.

All MRC staff are trained on Vulnerable Adult and Maltreatment Reporting rules. This is done prior to working with individuals and annually thereafter.

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

MRCI Shakopee serves a wide range of clients with varying emotional and physical abilities from needing no assistance to needing considerable staff support. 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, DCD, deafness, depression, schizophrenia, bipolar, anxiety, diabetes, fetal alcohol syndrome, and PTSD. We have a majority of individuals who are able to independently ambulate. A smaller portion of our clients use walkers, wheelchairs, motorized wheelchairs and/or have a physical restriction per a doctor. Some individuals present with emotional challenges. These individuals may be on various programming initiatives as stated in their individual plans and support outcomes.

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 Shakopee site is barrier free. The building is all one level. There are 2 doors on the front of the building. The entrance to our work program has electronic doors. Our back entrances are not at ground level but have stairs to use when entering or exiting. The hallways throughout the building are wide for easy navigation. Restrooms are handicap accessible and have rails to assist clients if needed. All regular staff are trained annually on each person'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 Shakopee receive specific training regarding crisis plans, diabetes, seizures, and adaptive equipment as needed. All staff are trained on positive supports. 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 arises or recurs. 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. All staff are trained annually in Maltreatment of Vulnerable Adults Act. Any MRCI staff having knowledge of an incident or suspected maltreatment of a vulnerable adult will make a report either internally or externally, following all procedures outlined in the MRCI VA policy.

9. Describe the range of adaptive/maladaptive behavior(s) of persons the program plans to serve: MRCI Shakopee 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 no or limited (low level interactional and/or interpersonal social skills, personality disorders and/or deficits) to aggression (to include: to self, others, 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 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. 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.
  
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 proposed 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-Shakopee specializes in providing services that are tailored to meet the individual needs of a wide range of clientele, with a strong focus on Employment and community integration. 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 based on the individual needs of the client and their vulnerabilities. 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:

All MRCI staff are trained on the following: First Aide, 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 diagnosis of individuals they work with. MRCI Shakopee has a specific orientation packet which outlines client specific training and DHS required training: food preparation/handling, infection control, defensive driving, Emergency procedures, HIPPA and related OSHA training; including competency tests. Within 72 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.

Specific medical training for staff at MRCI Shakopee is based on client specified services which include but are not limited to administering medication and treatments such as inhalers, glucose testing, and preparing food as ordered by physicians. 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.

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 annually on each person'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 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). 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 specific programs and/or protocols. 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.

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 2016-June 2017)

*There have been no substantiated maltreatment findings that occurred at MRCI-Shakopee 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-Shakopee participate in the construction of an Individual Abuse Prevention Plan for every client enrolled in the licensed program. Staff use this Plan 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 clients 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 Shakopee Program Site is designed to provide safe and functional space for the clientele and staff. This site is used primarily as a training center and is intended to maximize the program space which is designed for classes while still allowing for essential training and work space. This space is handicap accessible at the client entrance and is one story only for easy access. On a regular basis, there is use of items (machines and tools) that could be dangerous if misused. The site has no fire alarm but is well sprinkled.

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 Shakopee updates their site accessibility plan at least annually. We regularly train our staff and clients in the safe use of tools, machinery and resources within the building. Clients are trained in machine safety thru our Welcome Packet prior to starting on the job. This access to machines and tools that can be hazardous is also addressed in the Individual Abuse Prevention Plan, CSSP Addendum, and Self-Management plan. Because of the repetitive nature of some jobs we also complete daily stretches after our morning break to reduce work place injuries. We complete quarterly 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. In case of emergency there is a paging system in place to announce the emergency. This is used to alert all clients and staff that are in the building. Staff and clients have trained on safe and orderly evacuation out both the front entrances as well as via the west side exits. There is a fire hydrant within 150 feet of the MRCI front entrance. Fire and Rescue personnel will be directed to the front door for access to the site. If the front doors cannot be accessed, the Fire/Rescue personnel will be directed to the side door and then to the rear door if necessary.

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

The front offices can be difficult to supervise. The Warehouse area can also be difficult to monitor specifically the area behind the racking.

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. While these areas are monitored closely by staff, if any clients is

found to have broken the trust and/or rules around independently accessing these areas, a suspension from independent access shall be given- for a duration to be determined by MRCI, in conjunction with the Client's team.

## **ENVIRONMENTAL ASSESSMENT:**

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

MRCI Shakopee occupies approximately 20,000 square feet in a multiple business complex. It is located in an industrial park. The parking lot lies out the front door as well as a parking lot in the rear of the building. Busses load and unload clients to the front left entry. Traffic on Valley Industrial Blvd is fairly regular, with semi-trucks making up nearly 25% of all traffic. Eastbound Valley Industrial ends in front of the building occupied by MRCI. As the MRCI site is near that corner, cars and trucks are naturally either speeding up from the turn or slowing down for the controlled intersection. As such, they rarely are traveling at more than 15 MPH, thus significantly lowering the risk for clients to endanger themselves by failing to use safe street crossing skills.

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 Shakopee has an emergency plan that all staff are trained on (according to their required need to understand and implement). All clients and their teams receive training to this plan so that they are aware and can discuss any concerns/safety issues related to this layout. These are then addressed in a client's specific plan and outcomes. 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 Shakopee is in an Industrial Park. This is a flat location primarily but does have a grassy area out of the front as well as to the side and rear of the building. There is also a train track to the west of the building but it is not in operation. We are surrounded by other factories and warehouses.

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?

Staff maintain the walkways to be free from ice and debris. Also, staff at MRCI Shakopee participate in the construction of a support plan (e.g. Individual Abuse Prevention Plan, a Self-Management Assessment, and a CSSP Addendum) for every client enrolled in the licensed program. Staff use this as a primary teaching tool for awareness of individual vulnerabilities to abuse/neglect, functional limitations, and action plans to minimize risks. At orientation, clients receive training on our lease regulations regarding loitering and smoking. There is a curb cut for individuals by the primary client entrance to make it easier for individuals to enter our building that have mobility issues as well as a push button entry system.

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

MRCI Shakopee focuses on the development and maintaining of work skills to help individuals get or keep employment and get involved in the community. These include: life skills, in-center and community based paid employment experiences, social skills improvements, soft skill training, transportation skill training, accessing supported employment services as well as participating in community and engaging in activities of their choosing.

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?

Addressed in all three previous sections.

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, using the parameters set by the DWRS system, 245D, and in accordance with the individual's MRCI support plan. In general, this means that we staff at no less than a 1:10 ratio for people enrolled in our DTH and Pre-Vocational programs. MRCI Shakopee does staff for lower ratios as needed per the individual's support plan and as approved by the county of financial responsibility. 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 DWRS and the "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. 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. MRCI-Shakopee takes our responsibility to insulate our clientele from abuse, neglect and maltreatment very seriously. 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.



Duane Olenius, MRCI Board President

Aug. 5, 2019

Date

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