Program Abuse Prevention Plan

<table>
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<th>Program:</th>
<th>Opportunity Services</th>
<th>St Cloud</th>
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<tbody>
<tr>
<td>Address:</td>
<td>1717 W St Germain St</td>
<td>St Cloud MN 56301</td>
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<tr>
<td>Date plan developed:</td>
<td>1/1/2014</td>
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**POPULATION ASSESSMENT:**

1. Age range of persons receiving services: _______21-62_______

2. How will the program reduce the potential of abuse and/or harm to people related to the age of people receiving services? Staff are trained on Vulnerable Adult abuse prevention annually. Consumers and their representatives are provided with the specific policy annually. Each consumer has an Individual Abuse Prevention Plan (IAPP) identifying and addressing any age related risks and staff are trained on individual IAPPs.

3. Gender of persons receiving services: _____Male and Female_____

4. How will the program reduce the potential of abuse and/or harm to people related to the gender of people receiving services? Staff are trained on Vulnerable Adult abuse prevention annually. Consumers and their representatives are provided with the specific policy annually. Each consumer has an Individual Abuse Prevention Plan (IAPP) identifying and addressing any gender related risks and staff are trained on individual IAPPs.

5. Describe the range of mental functioning of persons receiving services:
Consumers have diagnosis of mild to moderate cognitive impairments, Autism, Aspbergs, Down’s Syndrome, Fetal Alcohol, ADHD, Brain Injury, Cerebral Palsy, Stroke, MS.

6. How will the program reduce the potential of abuse and/or harm to people related to the mental functioning of people receiving services?
Staff are trained on Vulnerable Adult abuse prevention annually. Consumers and their representatives are provided with the specific policy annually. Each consumer has an Individual Abuse Prevention Plan (IAPP) identifying and addressing any mental functioning related risks and staff are trained on individual IAPPs.

7. Describe the range of physical and emotional health of people receiving services:
The physical health of consumers in the program includes people in wheelchairs, with a walker, with leg braces, without use of a hand or arm, with difficulty walking, hard of hearing, obesity, doctor’s restrictions on lifting bending and twisting, back issues, respiratory ailments, canes, vision problems, and speech issues. Consumers have emotional health issues including depression, anxiety disorders, attachment disorders, ADHD, suicidal tendencies, oppositional defiance, PTSD, eating disorders, Autism, Bi-polar disorder, Dementia, and Intellectual development disorders.

8. How will the program reduce the potential of abuse and/or harm to people related to the physical and emotional health of people receiving services served?
Staff are trained on Vulnerable Adult abuse prevention annually. Consumers and their representatives are provided with the specific policy annually. Each consumer has an Individual Abuse Prevention Plan...
9. Describe the range of adaptive/maladaptive behavior(s) of people receiving services:
Consumers served display maladaptive behaviors including verbal anger outbursts, stealing, lying, work refusal, threatening staff with legal action, elopement, swearing, and defiance.

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?
Staff are trained on Vulnerable Adult abuse prevention annually. Consumers and their representatives are provided with the specific policy annually. Each consumer has an Individual Abuse Prevention Plan (IAPP) identifying and addressing any mental functioning related risks and staff are trained on individual IAPPs. The individual maladaptive behaviors for each person are identified and discussed with the team and agreed upon measures are outlined in the IAPP.

11. Describe the need for specialized programs of care for people receiving services:
In some cases, a smaller staff ratio may be instituted to elevate the level of care a consumer receives. Currently, there is one consumer with a 1:1 staff requirement due to elopement issues.

12. How will the program reduce the potential of abuse and/or harm to people related to the need for specialized programs of care for people receiving services?
Staff are trained on Vulnerable Adult abuse prevention annually. Consumers and their representatives are provided with the specific policy annually. Each consumer has an Individual Abuse Prevention Plan (IAPP) identifying and addressing any mental functioning related risks and staff are trained on individual IAPPs. The individual maladaptive behaviors for each person are identified and discussed with the team and agreed upon measures are outlined in the IAPP including consumers with specialized programs like a 1:1 staffing.

13. Describe the need for specific staff training to meet individual service needs:
Staff are trained in Vulnerable Adult law and policy, Individual Abuse Prevention Plans (IAPP), client goals and rights, safety procedures and health procedures, specific diagnosis trainings, vehicle safety and transportation policies, behavioral interventions, medical procedures and medication administration, engaging clients in activities, communication techniques, and our Mission, Vision and Values as a company. There are Staff on site trained in CPR and First Aid care.

14. How will the program reduce the potential of abuse and/or harm to people related to the need for specific staff training designed to meet individual service needs?
Opportunity Services has a training process with documentation to ensure that staff have the required trainings to work with the people they have assigned to them to work with.

15. Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to people receiving services:
No previous abuse accusation has been substantiated in this program.

16. How will the program reduce the potential of abuse and/or harm to people related to the knowledge of previous abuse?
Any reported potential abuse is investigated and possible causes and preventions are discussed. Staff will be retrained if warranted to prevent possible abuse as found in the investigation.

PHYSICAL PLANT ASSESSMENT:

1. Describe the condition and design of the facility as it relates to safety for the people receiving services: Opportunity Services St Cloud is primarily community based employment. The design of the work sites as it relates to safety are determined by the internal requirements of the individual businesses. The administration office in St Cloud does employ 2 consumers. The facility is routinely inspected and conforms to safety standards.

2. How will the program reduce the potential of abuse and/or harm to people related to the condition and design of the facility in terms of safety for people receiving services?
   Job Hazard analysis inspections are performed at all community job sites to identify potential safety hazards to consumers. Safety procedures are formulated and implemented conforming to the business’s safety policies. Any hazards identified are addressed and removed, fixed, or a plan is put in place to avoid.

3. Describe any areas of the facility that are difficult to supervise:
   Community based work sites can be large and spread out. The program does not require constant eye contact supervision 100% of the time. Staff will supervise consumers according to policy and procedure.

4. How will the program reduce the potential of abuse and/or harm to people related to the areas of the facility that are difficult to supervise?
   OS staff will know where consumers are at all times during their work shifts and visually check on consumers several times per hour if they are working out of site. Staff and consumers receive training on VA policy annually and consumer IAPP’s are reviewed by the team and any unsupervised time procedures are implemented.

ENVIRONMENTAL ASSESSMENT:

1. Describe the location of the facility including information about the neighborhood and community that the facility is located:
   All of the community work sites and the office are located in the St Cloud area. St Cloud is a medium sized city with adequate public transportation.

2. How will the program reduce the potential of abuse and/or harm to people related to the location of the facility, including factors about the neighborhood and community?
   Staff will record and report any claims of potential or actual abuse relating to job site locations in the community. Staff and are trained on VA abuse annually and consumers are informed of their rights and protections as VA annually and periodically during site trainings. City bus transportation issues brought forth by consumers are relayed to the team and bus company for investigation.

3. Describe the type of grounds and terrain that surround the facility:
   St Cloud has adequate sidewalks and snow removal to ensure ground and terrain are generally safe.

4. How will the program reduce the potential of abuse and/or harm to people related to the type of grounds and terrain that surround the facility?
Staff will monitor consumers for adequate foot wear for the conditions, grounds, and terrain around the work facility. Any issues will be addressed with the team.

5. Describe the type of internal programming provided at the program:
   Internal program provided by the program is based comprehensively around work skills training. Safety and VA policies are part of the program. Monthly safety drills and site trainings are performed.

6. How will the program reduce the potential of abuse and/or harm to people through the type of internal programming provided at the program?
   The internal programming will help train consumers in safety, abuse reporting and prevention, and interpersonal relationships to reduce potential abuse.

6. Describe the program’s staffing pattern:
   Staff ratios in St Cloud are a minimum of 1:6 and may be up to 1:10.

8. How will the program reduce the potential of abuse and/or harm to people through the program’s staffing pattern?
   An adequate staff to consumer ratio is maintained to ensure the potential of abuse or harm is minimized for all consumers.

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 must review the program abuse prevention plan at least annually.

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. The plan must include a statement of measures to be taken to minimize the risk of abuse to the vulnerable adult(s) or when the need for additional measures is identified. This includes identifying referrals that are made when the vulnerable adult is susceptible to abuse outside the scope or control of the licensed services.

E. 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.

F. 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 individual abuse prevention plans must be reviewed at least annually by the interdisciplinary team.
Print name and title  
Signature  
Date

Date(s) of last plan review: ___________________ ___________________ ___________________

Print name of County Licensor  
Signature of County Licensor  
Date

Print name of County Licensor who reviewed this plan

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