

Program Abuse Prevention Plan

Program:	CHOICE, Incorporated
Address:	12400 Whitewater Drive, Suite 2060
	Minnetonka, MN 55375
Date plan developed:	December 16, 2013

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: 18 years and older
- 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?

Common age-related physical changes in older adults include hearing impairment, weakening vision, and the increasing probability of arthritis, hypertension, heart disease, diabetes, and osteoporosis. The speed with which information is encoded, stored, and received may decrease as we age, and older adults may experience memory loss.

Because it may take older adults more time to encode, store, and retrieve information, the rate at which new information is learned can be slower among aging adults, and older adults often have a greater need for repetition of new information. Staff will exhibit patience and respect as the need for repetition increases with older adults.

Hearing impairment among older adults is often moderate or mild, yet it is widespread; 48 percent of men and 37 percent of women over age 75 experience hearing difficulties. Staff may need to face directly towards older adults when speaking to ensure communication is taking place. Older adults may need extra verbal guidance in an emergency.

Visual changes among aging adults include problems with reading speed, seeing in dim light, reading small print, and locating objects. Adequate lighting may be necessary to assist older adults to work, and navigate unfamiliar areas.

The amount of time it takes to respond to features in the environment once they are detected is typically slower among older adults. Staff may need to approach older adults with extra patience and understanding.

The proportion of older adults needing assistance with everyday activities increases with age. Nine percent of those between ages 65 and 69 will need personal assistance, while up to 50 percent of older Americans over 85 need assistance with everyday activities.

Older adults are at greater risk of harm from a fall; staff will make the extra effort to assist our senior participants to navigate uneven and/or slippery surfaces.

Older adults are at greater risk in extreme weather; staff will make the extra effort to assist our senior participants to dress appropriately, encourage proper fluid intake, and engage in a level of activity appropriate to the extremes of the weather experienced.

Older adults are at a greater risk to ailments related to poor diet; staff will encourage healthy snacks and limit servings of snacks with high sugar and fat content, and caffeine.

There are a number of psychological problems associated with aging: Dementia, the irreversible deterioration of intellectual ability accompanied by emotional disturbance, afflicts between 5 and 7 percent of adults over age 65 and 30 percent of those over age 85. Unlike milder forms of mental decline with normal aging, dementia may lead to significant impairment in social functioning. People with dementia often suffer from depression, anxiety, and paranoia.

Alzheimer's Disease is a progressive disease that leaves a victim unable to form new memories and is marked by the loss of other mental functions. Early onset (age 40 or shortly after) Alzheimer's is highly common in adults with Down Syndrome. One of the primary symptoms of Alzheimer's Disease is the inability to recall newly learned information and disorientation. The onset of Alzheimer's is often gradual, occurring over a period of 8 to 20 years. At first, victims suffer memory loss and often get lost--even in their own homes. Eventually, they may fail to recognize other people, including family; show childish emotions; and lose the ability to dress and clean themselves. Sleep problems increase with age. Behavior disorders in those over age 65 can take the form of physical aggression, motor overactivity (wandering), and disruptive verbal outbursts. Common causes of behavior disorders include delirium, depression, dementia, and psychosis. Understanding that these issues arise with older adults, staff will provide additional guidance and care as necessary to reduce the risk of abuse and harm with our older

population. Additionally, early signs of dementia will be documented and reported to the individual's interdisciplinary team.

3. Gender of persons receiving services: All
4. What specific measures has the program taken to minimize the risk of abuse to people as related to the gender of people receiving services?

It is the policy of CHOICE not to discriminate or harass the people we serve based on gender or sexual orientation. CHOICE, Inc. provides programs that focus on employment, learning, and recreation and as such it is not place where it is appropriate to display one's sexuality in an overt manner. On an ongoing basis CHOICE, Inc. staff will teach participants about appropriate boundaries and interactions. Through a participant's daily interactions with others, staff will discuss and explain appropriate physical, emotional, and verbal boundaries. On an on-going basis Choice, Inc. staff teach self- preservation skills.

If an individual manifests signs of sexual activity (if not previously sexually active or consistent with the person's history), and/or unexplained injuries, and/or the individuals is unusually withdrawn or depressed staff will attempt to determine what may be occurring. Staff are required as mandated reporters to report any event that is suspected to be maltreatment.

CHOICE, Inc. employees are given instructions in and charged with the care and safety of persons served. Gender abuse can be same sex, it is not limited to male/female, and that statistics show that abuse and harm is most likely to occur with a trusted person be it a family member or a paid caregiver. Employees are trained to offer guidance, protection and assistance in areas where the participant's limitations hinder their adequate or safe handling of situations, and support and encouragement in where they can be expected to act reasonably.

All individuals receiving services are evaluated upon intake and annually thereafter to determine their areas of vulnerability and support necessary to reduce the risk to abuse and harm.

Our facility has no knowledge of previous Abuse/Neglect situations related to gender that are relevant to minimizing risk of abuse for participants.

5. Describe the range of mental functioning of persons the program plans to serve:
CHOICE, Inc. is a program that is designed to meet the needs of adults with intellectual disabilities. Participants may have but are not limited to: mild, moderate, severe, or profound cognitive impairments.
6. What specific measure has the program taken to minimize the risk of abuse to people as related to the mental functioning of people receiving services?
All participants are evaluated upon intake and at their annual meeting to determine areas of vulnerability. Plans are developed to address specific vulnerabilities and reduce the potential of abuse and/or harm. CHOICE, Incorporated staff meet education and experience requirements and receive comprehensive ongoing training (please refer to training/orientation and ongoing annual training documents).
7. Describe the range of physical and emotional health of the persons the program plans to serve:

The individuals choosing to participate in the services that CHOICE, Inc. offers have intellectual disabilities ranging from mild to severe.

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?
CHOICE, Incorporated staff meet education and experience requirements and receive comprehensive ongoing training (please refer to training/orientation and ongoing annual training documents). We additionally create behavior programs that focus on proactive and positive approaches for adopting appropriate behaviors.
9. Describe the range of adaptive/maladaptive behavior(s) of persons the program plans to serve:
We serve individuals skilled in varying levels of adaptive behaviors such as communication, self-care, social skills, community inclusion, self-direction, health and safety, leisure, and work. We additionally serve individuals who display maladaptive behaviors to varying degrees. These behaviors may include stereotypical behavior (repetitive movement, posture or utterance), aggression (such as grabbing), ritualistic behavior (often manifests in compulsive behavior), transition difficulties, tantrums (yelling and crying), opposition to follow directives, or verbally inappropriate behavior.
10. What specific measures has the program taken to minimize the risk of abuse to people as related to the adaptive/maladaptive behavior(s) of the people receiving services?
On an ongoing basis CHOICE, Incorporated staff teach participants about appropriate boundaries and interactions regarding physical, verbal, and emotional health. Staff will help participants understand and use a variety of non-aggressive problem solving techniques. Participants will be encouraged to remove themselves from harm's way if necessary.
11. Describe the need for specialized programs of care for persons the program plans to serve:
The people served at CHOICE have varied needs related to ensuring their health and safety. These needs may include care and assistance with tube feeding, colostomy bags, EpiPen auto-injectors, blood glucose level monitoring, special diets, lifts and transfers, wheel chair transportation, and seizures.
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?
All individuals receiving services are evaluated upon intake and annually thereafter to determine their areas of vulnerability and support necessary to reduce their risk to abuse and harm. Staff receive training to provide specialized programs of care necessary to ensure the health and safety of the people served at CHOICE, Inc. When necessary, training is provided by "Qualified Providers"; i.e. a Registered Nurse, the American Red Cross, or a manufacturer's representative for use of a specialty product.
13. Describe the need for specific staff training to meet individual service needs:
Upon intake and at minimum annually thereafter all staff review the service plans and needs of each individual receiving service at CHOICE, Inc. Staff training identified in the individual's service plan will be arranged by CHOICE, Inc. Program Supervisors and completed for all employees that work directly with the individual served in the timeframe specified in the plan.

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?
CHOICE, Incorporated staff meet education and experience requirements and receive comprehensive ongoing training (please refer to training/orientation and ongoing annual training documents). We additionally document annual and semi-annual meeting summaries which all staff are required to read and implement regarding individual service needs.
15. Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to people receiving services:
Our facility has no knowledge of previous abuse/neglect situations that are relevant to minimizing risk of abuse for participants.
16. What specific measures has the program taken to minimize the risk of abuse to people as related to the knowledge of previous abuse?
Our facility has no knowledge of previous abuse/neglect situations that are relevant to minimizing risk of abuse for participants. If an abuse/neglect situation arose, CHOICE, Incorporated follow the policies and procedures on reporting and reviewing the incident as well as provide appropriate training to staff.

PHYSICAL PLANT ASSESSMENT:

1. Describe the condition and design of the facility as it relates to safety for the people receiving services:
CHOICE, Inc. - Minnetonka site is located in a single story office building located in the 12400 Whitewater Plaza Complex. The building is in good working condition. Participants utilize seven different program areas within the building, all with staff supervision. The administrative offices are located in the front of the building. In addition to the program areas, participants may utilize the kitchen and conference room with staff supervision. There are three bathrooms that are monitored by staff, offering participants the choice of use between a multi stall bathroom and a single stall bathroom. Three main doors provide adequate access for entrance and exit routes. Exercise equipment is located within the program areas. Staff are always present to supervise, monitor and instruct participants on safe exercises and use of the equipment.
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?
Staff are present at all times to supervise and monitor all areas of the program to reduce the risk of harm to people receiving services. Participants utilize three main doors to enter and exit with the assistance of staff. Staff are present and provide supervision during transition times. Staff and participants are encouraged to notify a staff member if any part of the facility requires attention or maintenance. Emergency exit routes are posted and staff are trained on emergency policies and procedures. The location of fire extinguishers are noted on the emergency exit routes.

3. Describe any areas of the facility that are difficult to supervise:
Restrooms present the most difficulty in the supervision of the participants.
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?
Staff will supervise the bathrooms to the best of their ability. Staff will monitor the bathrooms and check on participants who have been in the bathroom for longer than 5 minutes. Staff will accompany and assist participants with needs related to personal cares.

ENVIRONMENTAL ASSESSMENT:

1. Describe the location of the facility including information about the neighborhood and community that the facility is located:
CHOICE, Inc.. is located in the 12400 Whitewater Plaza Complex in Minnetonka, MN. The building is in a quiet business park off of Whitewater Drive. CHOICE shares the office building with several other businesses. The city of Minnetonka offers many opportunities for community inclusion and involvement for CHOICE participants.
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?
Participants are aware that CHOICE, Inc. is located in a multiple business center and do not attempt to access any part of the building that is not leased by CHOICE, Inc. Staff will report any observed suspicious activity related to the neighborhood and community. Participants are reminded of pedestrian safety and are always supervised by staff when in the parking lot or near the train tracks and/or marsh.
3. Describe the type of grounds and terrain that surround the facility:
The Minnetonka site has a flat parking lot in the front and back of the building. The front of the building has a wide sidewalk with wheelchair accessible cut outs. There is a strip of grass and trees in the back of the building as well as a small area of grass in the front parking lot with picnic tables. The parking lot and sidewalks may become slippery during the winter months.
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 the surround the facility?
Participants are encouraged to use safe pedestrian skills when in the parking lot and on walk ways. Staff are present when participants are in the parking lot. Staff clear parking lot and walk ways of any debris and shovel snow and put ice melt on the ground during the winter months.
5. Describe the type of internal programming provided at the program:
CHOICE, Inc. internal programming occurs through three primary modes-Employment, Community Inclusion and Center Based Activities. Participants are provided with support by a job coach participating in vocational duties for various employers. Small groups participate in

educational and interactive activities in the community and also center based/onsite programming in the areas of safety and health and nutrition, as well as, a focus on educational, leisure and recreational onsite programs. Participants are also provided with programs to increase social skills and activities of daily living. CHOICE, Inc. prides itself on a large focus of instructional activities and events that offer assistance and preservation of self-advocacy skills. On an ongoing basis staff remind and encourage participants about using appropriate boundaries and interactions. Persons served are also provided with participant orientation including Financial and Health Related Authorizations, Policies and Procedures on Reporting and Review of Maltreatment of Vulnerable Adults, Temporary Service Suspension and Termination, Grievances, Data Privacy and an overview of the Program Abuse Prevention Plan, as well as, the development of Individual Abuse Prevention Plans and Coordinated Service and Support Plans.

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?
Participants are offered programs in the areas of safety, health and nutrition and are provided with information and knowledge on general safety skills, as well as, living a healthy lifestyle. Participants are offered educational, leisure and recreational programs in a safe and productive environment both onsite at CHOICE, Inc. and in the community. Staff are always present and monitoring all activities. Participants are offered programs related to Skills Training and Employment Preparedness to assist with appropriate vocational skills. Through participants' daily interactions, staff will discuss and explain appropriate physical, emotional and verbal boundaries. Staff will help participants to understand the importance of using non-aggressive problem solving techniques. Staff will continuously encourage participants to remove themselves from any situation in which they are uncomfortable. All internal programs are conducted in a safe and appropriate environment. All participants, with the collaboration of their Support Team, will be evaluated for health and safety concerns during the development of their Individual Abuse Prevention Plan. All staff will read and acknowledge all participants' IAPP's.
7. Describe the program's staffing pattern:
Staff are employed in the number necessary to meet or exceed the sum of the staff to participant ratio determined through the calculation required in Statute 245D.
8. What specific measures has the program taken to minimize the risk of abuse to people through the program's staffing pattern?
CHOICE, Inc. staff are employed in numbers sufficient that people served interact with many staff throughout the day. This interaction minimizes the risk of harm or abuse from any one staff's actions. CHOICE, Inc. staff meet education and experience requirements and receive comprehensive ongoing training (please refer to training/orientation and ongoing annual training documents). All staff are trained to understand the responsibilities of a mandated reporter and are to act as such when necessary. Additionally we document annual and semi-annual meeting summaries which all staff are required to read and implement regarding individual service needs.

Review: Name _____ Shelli Sjostrom ____ Signature____ *Shelli Sjostrom* _____ Date__ 1/4/2018 _____

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.

Review: 1/18/19 Revised? NO

Review: 1/15/20 Revised? NO

Review: 8/1/2021 Revised? No

Review: 8/2/22 by Nicole Brown, Designated Manager. Revised? No

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