

Adult Foster Care (AFC) and Community Residential Setting (CRS) Program Abuse Prevention Plan (PAPP)

License Holder Name: EBI Denfeld – Sarah Hamilton

AFC License Number:(if applicable

CRS License Number: 1068571-1-H_CRS

Program Address: 3921 West 4th Street Duluth, MN 55807

Date Plan Developed: 12/1/13

The Human Services Licensing Act (HSLA), Minnesota Statutes 245A.65, subdivision 2, governs what is required in the adult foster care (AFC) and community residential setting (CRS) program abuse prevention plan. License holders must develop and enforce a written program abuse prevention plan in accordance with the HSLA, and the Reporting of Maltreatment of Vulnerable Adults Act (VAA), Minnesota Statutes 626.557, subdivision 14.

POPULATION ASSESSMENT

Describe the persons the program is planning to serve. Assess the possible risk of harm and/or abuse in each identified area.

Describe the program's plan to reduce the risk of harm and/or abuse to persons served in the assessed area.

Age: Serve persons ages 18+; Currently serving women in the home with the age range of 20-60's years old.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

The individuals served have an increased risk for cognitive changes as they age; increased risk for falls, injury, and illness; changes with mobility; and an increased risk for health problems.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI direct care staff will receive ongoing training related to each individuals needs and how to assist and interact with the person according to their age group; EBI will provide adaptive equipment within the home, as applicable, to assist the individual according to their identified needs. EBI direct care staff will identify and assist with following recommendations for safety and medical needs; EBI staff will seek medical care according to identified screening and treatment needs. EBI will provide training to the people being served on safety precautions to take according to their specific age groups (in example – fall prevention, medication/medical needs). EBI staff will receive annual training regarding responding to and reporting health and medical concerns and accident and incident reporting.

Gender: Male or Female; Currently, women reside in the home.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

None

Describe the Plan to Reduce the Risk to Persons Served by the Program

NA

Mental Functioning: Currently serving persons with a diagnosis of developmental disabilities with mild to moderate cognitive delay.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

The individuals served are vulnerable adults and have an increased risk of harm, abuse, and neglect due to their level of functioning, limited judgement and decision making skills, and the inability to care for themselves.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI direct care staff will receive training upon hire, when revisions are made to individual plans, and at least annually in regard to the individual's needs, vulnerabilities, strengths and abilities, and their functioning level. Training will include how to assist the person being served at their functioning level and how to carry out their identified needs; Each person will have a coordinated service plan (CSP) and a CSSP addendum. EBI staff will assist the individual with carrying out specified needs within these assessments and plans. EBI's DM or DC will review/revise the assessments/plans at least annually with the person being served and their legal representative, county case managers, and other identified individuals in their plans as applicable; EBI's DM or DC will report

changes to the individual's functioning level to the appropriate individuals, according to the person's coordinated service plan/health plan or protocols; EBI staff will regularly teach consumers practical living skills, assist with problem solving, and provide verbal training in how to report and defend self in situations that may arise. EBI staff will receive training upon hire and at least annually thereafter in how to respond to and report emergency and medical needs, and incidents of known or suspected maltreatment of a vulnerable adult.

Physical & Emotional Health: Serving individuals who require moderate to total assistance with their physical health (including, but not limited to: caring for health needs, monitoring general health and conditions, administration of medication and treatment orders, assisting with medical appointments, etc.) Serving persons who require ongoing management with emotional health needs, which may be related to diagnosis of depression, anxiety, impulse control order. Assistance provided include, but not limited to: monitoring and documenting on behaviors, providing positive support strategies, administration of medications if prescribed, assisting with medical appointments, providing regular positive feedback and role play.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

The individuals served are at risk for experiencing a decline in physical and emotional health and functioning abilities; loss of independence, mood instability, and increased behaviors.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI direct care staff will receive training upon hire, when revisions are made, and at least annually regarding each individual's physical and emotional health needs. Training will include how to assist and carry out individualized physical and emotional health needs for each person served; EBI's DC or DM will develop plans, protocols, and schedules that relate to the physical and emotional health for people being served according to their needs and will ensure that EBI staff carry out the plans as written; Each person will have a coordinated support plan (CSP) and a CSSP addendum. EBI staff will assist the individual with carrying out specified needs within these assessments and plans. EBI's DM or DC will review/revise the assessments/plans at least annually with the person being served and their legal representative, county case managers, and other identified individuals/team members, as applicable; EBI's DM or DC will ensure that EBI staff carry out the plans as written; EBI's DC or DM will report changes to the individual's physical or emotional health to the appropriate individuals and health care team according to the person's coordinated service plan/health plan or protocols; EBI staff will regularly teach consumers practical living skills, and assist with problem solving. EBI will have written emergency plans in place to report and respond to physical and emotional health needs. EBI staff will receive training upon hire and at least annually thereafter on how to follow vulnerable adult reporting procedures if there is the potential for abuse/harm to the person served or if it is suspected or it has occurred.

Behaviors: No behavioral plans or positive support transition plans are being implemented. Identified behaviors demonstrated by individuals in the home have included: verbal aggression; non-compliance with daily tasks; increased/loud tones; threats of SIB or threatening to hit/hurt support staff with no documented attempts.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

Elevated risks of mistreatment by others, risk of injury from SIB behavior, vulnerable to verbal aggression, increased health risks relating to increased stress and anxiety, difficulty with coping and problem solving. Increased risk with declining general health, appearance, independence, or mental health

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI direct care staff will receive training upon hire, when changes with the person's behavior occurs, and at least annually in regard to each person's adaptive/maladaptive behavior. Training will identify how to assist the person according to their needs and what proactive and reactive measures to take for behaviors; EBI's DM or DC will develop a plan for behavior management, with instruction/input from the individuals team and or psychiatry, if the individual has identified behaviors that require intervention, training, and or support. EBI's DM or DC will ensure that EBI staff carry out the plans as written; EBI staff will physically assist the individual with receiving behavioral health services as prescribed; EBI direct care staff will assist the individual with carrying out any specified behavior needs/protocols and offer ongoing behavior management/training, and role play sessions to the person; EBI support staff will regularly evaluate and report changes in the individual's behavior to the appropriate individuals, according to the person's coordinated service plan/behavior plan or protocols. EBI staff will seek emergency care if needed and assist the person with carrying out any prescription medication orders as written. EBI staff will receive

training upon hire and at least annually thereafter on how to follow vulnerable adult reporting procedures if there is the potential for abuse/harm to the person served or if it is suspected or it has occurred.

Need for Specialized Programs: Positive Support Strategies; Medical plans/protocols; Individual outcomes/supports; Recommended diets; Individual or group counseling, roleplay, house meetings.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

Individuals being served have medical and behavioral needs that require ongoing monitoring and care from trained staff. Individuals being served do not present the skills to independently care for themselves in these areas. If support is not provided, the individual may not receive adequate services according to their individual needs and their overall health and safety may be at risk.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI's DM or DC will develop individual plans and or protocols, with the assistance from the individuals care team/medical professionals, for individuals served that require specialized programs for care. EBI's DM or DC will ensure that EBI staff carry out the plans as written; EBI support staff will set up, attend, and transport persons to appointments that require specialized programs that do not occur within the EBI home. EBI' DM/DC will regularly evaluate any specialized programs and report changes to the appropriate individuals, according to the person's coordinated service plan/behavior plan or protocols. EBI support staff will receive training upon hire, when changes occur, and at least annually that relate to the individual's specialized needs, plans and protocols. Training will also include how to assist the person according to their plans and protocols; EBI staff will receive training upon hire and at least annually thereafter on how to follow vulnerable adult reporting procedures if there is the potential for abuse/harm to the person served or if it is suspected or it has occurred.

Specific Staff Training for Individual Needs: EPI Pen and Inhaler use protocols; Blood pressure monitoring and protocols; Epilepsy monitoring, care, and protocols; PT and OT protocols; Medication administration procedures. In addition, specific staff training will be performed to meet individual service needs and will include training on each person's CSP and CSSP Addendum and any other individualized plans specific to the individual. EBI staff will hold current certification in CPR and First Aid.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

Health, wellness, and protection risks; Individuals being served require trained staff. Individuals being served do not present the skills to independently care for themselves in these areas.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI's DM or DC will develop individual plans and or protocols, with the assistance from the individuals care team/medical professionals, for individuals served that require specific programs for care. EBI's DM or DC will ensure that EBI staff carry out the plans as written; EBI direct care staff will receive individual training specific to the individual being served upon hire, annually, and when there is change with individual service needs/plans; EBI staff will hold current certification in CPR and First Aid; EBI's DM or DC will report any specific changes to the appropriate individuals according to their coordinated service plan and addendum; EBI's DM or DC will regularly train, evaluate, and revise as needed, staff training for individual service needs and company policies to ensure that training is appropriate, licensing guidelines are being followed, and that it meets the needs of the individual's served.

Knowledge of Previous Abuse: No knowledge of previous abuse.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

Individuals being served are Vulnerable Adults. They are at risk for abuse and neglect.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI staff will receive training upon hire, as needed, and annually thereafter in the Vulnerable Adult Act and reporting procedures for Vulnerable Adults. EBI's DM will conduct a background check on employees prior to working for EBI and as needed. EBI's DM or DC will provide ongoing supervision of the home, consumers of EBI, and EBI staff, and follow EBI's reporting guidelines regarding known or suspected abuse if observed or reported. EBI's DM or DC will regularly train, evaluate, and revise as needed, staff training for individual service needs and company policies to ensure that training is appropriate, licensing guidelines are being followed, and that it meets the needs of the individual's served EBI's DM or DC will regularly evaluate the level of service individuals receive through verbal contact with the individual and their team members, provide satisfaction surveys at least annually, and obtain input at team meetings.

PHYSICAL PLANT

Describe the physical plant in which the program is located. Assess the possible risk of harm and/or abuse to persons served based on the physical plant.

Describe the program's plan to reduce the risk of harm and/or abuse to persons served in the assessed area.

Condition and Design of the Physical Plant: EBI Denfeld, which was built in 1922, is a 4 bedroom home with an upstairs, main living floor, and basement, all in good living condition. Each person has their own bedroom and they share a full size bathroom. On the main floor, there is a living room, front staff office, dining room, kitchen, and staff bedroom. The basement has a laundry area, bathroom, maintenance room, storage shelves, and a storage area for cleaning supplies and chemicals. The fuse box/panel, furnace and hot water heater are also located in the basement. In the upstairs/top floor of the home there are four bedrooms, one for each person receiving services. There is a small closet and a full bath on this floor also. The home has fire alarms on each floor and in each bedroom for the detection of smoke and fires. The home also has carbon monoxide detectors and fire extinguishers throughout the home and on each level. There is a first aid station/area that supplies emergency equipment/first aid needs on the main level. There is a detached garage. Inside bedroom, bathroom, and office doors of the home are capable of being locked. Bedroom doors are often locked by the persons served during day hours while they are away. Outside doors of the home are capable of being locked and are locked when there is no one home and during day hours and they are also locked during the overnight hours.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

There is a risk that things within the home could malfunction at any time or the physical plant could become difficult for others.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI staff will complete daily cleaning/upkeep of the entire home and report any maintenance needs immediately to the DC or DM; Cleaning chemicals or gas used to maintain or keep the home in a good and clean living condition will be stored away from food or where there is flame present, and in a safe location. EBI staff will use safety precautions and assist the person's being served when areas in their living space may temporarily present hazards due to cleaning or completing repairs; EBI staff will keep medications secure and locked up; EBI will have working smoke detectors and carbon detectors located throughout the home and will be checked by EBI staff on a monthly basis. Smoke and carbon detectors will have their battery replaced annually or sooner if needed; Fire extinguishers will be located throughout the home and will be inspected annually by a professional service company and replaced as needed; EBI will have a working furnace in the home, which will be inspected annually by a professional company. EBI staff will change the furnace filter monthly; EBI will have a first aid kit, radio, and flashlight available to assist with responding to emergency situations and or to provide safety as needed; EBI will have a floor plan of the home posted on the main living floor that identifies escape/protection plans in the event that there was an emergency; EBI direct care staff will not adjust hot water settings on the hot water tank; EBI direct care staff will assist the consumers according to their needs if the condition of the home presented a hazard or any type of harm; EBI staff will have a set of keys to all locking doors available for use while on duty. There will be a lockbox outside of the home that stores a key to gain access to the inside of the home if needed; EBI staff will receive training upon hire and quarterly to annually thereafter in safety policies and procedures in regard to the home and responding to emergency alarms/power outage. Training will also be provided on the program abuse prevention plan upon hire and annually thereafter.

Areas Difficult to Supervise: Individual bedrooms/upstairs, basement, and detached garage.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

Response time to areas difficult to supervise may be delayed if an incident were to happen.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI staff will immediately respond to areas difficult to supervise if unfamiliar noises can be heard and when requests are made from the person being served. EBI will have a set of keys to all locked doors; EBI staff will complete visual checks at least every two-three hours during awake hours to each person being served, or more often if identified in a person's individual plan; EBI will supervise persons being served if they are in the detached garage; EBI is a 24 hour care facility. EBI staff will complete a visual check and provide any assistance needed during awake and asleep hours according the persons individualized plan; EBI staff will receive training upon hire and at least annually thereafter in requirements for supervision.

ENVIRONMENT and COMMUNITY

Describe the physical plant in which the program is located. Assess the possible risk of harm and/or abuse to persons served based on the physical plant.

Describe the program's plan to reduce the risk of harm and/or abuse to persons served in the assessed area.

Neighborhood and Community: The home is located in a residential neighborhood on a side road in Duluth, MN. The home is in the middle of the block and has neighbors on each side of the home and across the street. There is an alley behind the home. The home has a small deck in the front and in the back of the home. The home is in walking distance to a bus line and businesses. There is a sidewalk in front of the home and in the neighborhood. There are busy streets nearby with crosswalks and traffic signals.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

The neighborhood and community may present various safety risks when individuals are being independent.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI staff will provide ongoing training to the individuals served regarding community safety and pedestrian safety. EBI staff will follow EBI's reporting procedures if a safety incident occurs.

Grounds and Terrain: The backyard is open and not fenced in. There is a deck off the back of the house with seating available. There is a gas grill kept on the deck during summer months. The yard is covered with grass and is straight/even. The front and one side of the house has a sidewalk leading to the front sidewalk by the road. There is a narrow grass covered path that leads to the detached garage in the back of the house. There is a small deck in the front of the home.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

Terrain/sidewalks in front or around the home may become icy and are uneven, causing an increased risk of falling. Maintenance or safety concerns could arise causing an increased risk for injury.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI staff will keep the home and grounds outside the home clean and hazard free. EBI staff will receive training upon hire and at least annually in housekeeping responsibilities outside the home; EBI staff will report any maintenance needs to the Designated Coordinator immediately; During summer months, the gas grill will be kept covered and the gas off when not in use. When EBI staff are using the gas grill, EBI staff will provide supervision near the area of use at all times until the grill is off and covered. EBI staff will assist the consumers if they would like to use the grill. The gas grill will not be placed by the side of the house; EBI will keep the yard surrounding the home clean and mowed during summer months; EBI staff will keep sidewalks free of debris at all times and will salt/shovel walkways during the winter months; EBI will have emergency routes and the deck in front of the home and back of the home shoveled after snow storms, snow, or ice. EBI will have a designated smoking area.

Type of Internal Programming: Internal programming will be planned according to the individual needs to decrease dependency and vulnerability when applicable. The following programming takes place at EBI on an individual basis according to the individuals wants and needs: Hygiene skills, dressing, and grooming; Dieting and weight management; Recreation skills and leisure time activities; Money management, identification, budgeting, and shopping; Self-preservation; Domestic skills and housekeeping responsibilities/cleaning; Community integration skills; Meal planning and preparation; Pedestrian safety and traffic awareness; Individual rights and responsibilities; Social skills, safety skills, role play, and identification and responding to emergency situations; Behavior management and problem solving; Medication management, administration and identification.

- **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

If EBI does not provide internal programming as identified in each person's individual plan, there is a risk that the individual served will not be provided with services that they are eligible for or need. The individual may be at risk for losing learned skills, strengths and abilities, and become more vulnerable.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI's DM, DC, the individual, and the individual's team will develop individual internal programming support services for persons served that meet their need and skill level. EBI staff will regularly assist the Individual with internal programming needs; EBI's DM or DC will regularly evaluate internal programming for each individual served through reviewing documented data, having ongoing communication with staff and the individual, and through observations of the individual and when receiving internal programming. Obtained information will assist if areas of further need is needed or if revisions need to be made to specific internal programming plans; EBI's DM or DC will provide individual progress reports to the individual's team that pertain to internal programming for team review. Progress reports will be provided to the team members according to the person's coordinated service plan and addendum; EBI direct care staff will receive training upon hire, annually, and when revisions are made to each

individual's internal programming plans. Training will also identify how to assist the person according to their needs/programs.

Staffing Pattern: 1:4 or 2:4 staff ratio when the consumers are home prior to asleep hours. 1:4 staff ratio during asleep hours. The Designated Coordinator is staffed and available during day hours when the consumers are at work.

• **Describe Any Possible Risks - if there are no risks in this area please state that there is no risk**

Emergency may occur at any time or incidents that require increased staffing needs.

Describe the Plan to Reduce the Risk to Persons Served by the Program

EBI is a 24 hour care facility; EBI staff will be available during all hours of operation and will staff accordingly to meet each individual's needs. EBI's DM or DC will be on call outside of normal office hours.

EACH PROGRAM MUST ENSURE THAT:

- 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.
- The license holder's governing body must review the program abuse prevention plan at least annually.
- 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.
- 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.
- 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.
- 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.

Sarah Hamilton

Print name of License-Holder

Signature of License-Holder

Date

Date(s) of plan review

5/1/14;

5/1/15;

5/1/16;

5/1/17;

5/1/18; 8/1/18 – Revised, see highlighted areas.

5/1/19 – No changes

8/15/19 – Revised, change in household status.

9/30/19 – Revised, change in household status

5/1/20 – Annual Review, no changes

5/1/2021 – Annual Review, no changes