



<b>Program Abuse Prevention Plan</b>	<b>Date Plan Was Developed:</b> July 10, 2025
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<b>Program Name:</b>	PAI Commerce
<b>Program Abuse Prevention Plan Prepared By:</b>	Cortney Kelly
<b>Name and Title of Designated Manager:</b>	Cortney Kelly, Senior Program Director
<b>Approved Incident Reviewers [Name(s) and Title(s)]:</b>	Cortney Kelly, Senior Program Director Felicia Schwartz, Program Supervisor

<b>Describe the plan for emergency contact and designation of authority when the Program Director is not present on site.</b>	The most senior Program Supervisor will assume all supervisory responsibilities when the Program Director is not present. The Program Supervisor will connect with the Chief Operating Officer as needed. In the absence of the Program Director and Program Supervisors, the most senior Lead Direct Support Professional staff will assume supervisory responsibilities. When a Lead Direct Support Professional is assuming responsibility for the program, they will be directly notified verbally or in writing.
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This Program Abuse Prevention Plan (PAPP) is developed in accordance with Minnesota Statutes, Chapter 245A.65 and Minnesota Rules, part 9544.0030, to ensure the health and safety of vulnerable adults served by PAI. Participants receive a copy of the PAPP within 24 hours of admission (or 72 hours if delayed is appropriate).

**Population Assessment:**

<b>1.</b>	<b>Age Range of Persons Receiving Services:</b>  18 and up.
<b>2.</b>	<b>How will the program reduce the potential of abuse and/or harm to participants related to the age of the participant receiving services?</b>  Staff members are trained on the participant’s Support Plan, Support Plan Addendum (SPA), Self-Management Assessment (SMA), Individual Abuse Prevention Plan (IAPP) and Behavior Support Plan (BSP), if applicable, for all participants at time of hire and, at minimum annually, thereafter. Per 245D.071, subd. 5, each participant’s SPA, IAPP, and SMA are reviewed annually during a team review meeting and revised as needed to reflect current risk factors and protective interventions, and service needs.

	<p>Staff members will encourage age-appropriate interactions with others. All staff complete orientation and ongoing annual training per 245D.09, subd. 4, including maltreatment reporting, positive support strategies, safe environments, and individual-specific risk factors.</p> <p>Handrails are provided in main hallways, hallways are kept free of debris and spills, and sidewalks are kept free of snow and ice.</p> <p>If it is determined that additional support services are needed related to age, PAI will assess whether we are able to provide additional support. If unable, PAI will refer individuals for additional support and/or alternate programs better suited to their needs.</p>
<p>3.</p>	<p><b>Gender of Participants Receiving Services:</b></p> <p>Male, Female, and Non-Binary; PAI programs are offered equally to all genders.</p>
<p>4.</p>	<p><b>How will the program reduce the potential of abuse and/or harm to participants related to the gender of the participant receiving services?</b></p> <p>IAPPs and SPAs are created for participants prior to service initiation. In addition, the SMA is created within 60 days of service initiation. These documents help assess support needs including those related to gender. Per 245D.071, subd. 5, each participant’s SPA, IAPP, and SMA are reviewed annually during a team review meeting and revised as needed to reflect current risk factors and protective interventions, and service needs.</p> <p>If it is determined there are support needs related to gender, PAI will attempt to provide these supports either through existing programs or through the development of new programs. If unable, PAI will make referrals for the appropriate support.</p> <p>PAI Commerce offers gender-specific restrooms as well as non-gender specific restrooms which are single occupancy.</p> <p>All staff members at PAI Commerce receive annual training on Sexual Violence. All staff complete orientation and ongoing annual training per 245D.09, subd. 4, including maltreatment reporting, positive support strategies, safe environments, and individual-specific risk factors.</p>
<p>5.</p>	<p><b>Describe the range of mental functioning of participants receiving services:</b></p> <p>PAI supports participants with a wide range of mental functioning, including intellectual and developmental disabilities, severe and persistent mental illness, and brain injuries.</p>
<p>6.</p>	<p><b>How will the program reduce the potential of abuse and/or harm to participants related to the mental functioning of the participant receiving services?</b></p> <p>Each participant is assigned a Designated Coordinator, who is a staff member responsible for coordinating the various services that the participant receives. Staff members are trained on the specific strengths and needs of the people they support, and the requirements for service delivery. Per 245D.071, subd. 5, each participant’s SPA, IAPP, and SMA are reviewed annually during a team review meeting and revised as needed to reflect current risk factors and protective interventions, and service needs.</p>

	All individuals receiving services at PAI Commerce are considered vulnerable adults. All staff complete orientation and ongoing annual training per 245D.09, subd. 4, including maltreatment reporting, positive support strategies, safe environments, and individual-specific risk factors.
7.	<p><b>Describe the range of physical and emotional health of people receiving services:</b></p> <p>PAI supports individuals with a wide range of physical and emotional health needs.</p>
8.	<p><b>How will the program reduce the potential of abuse and/or harm to participants related to the physical and emotional health of the participant receiving services?</b></p> <p>Everyone served at PAI has a SPA, SMA, and IAPP on file that outlines any supports required to meet physical needs, including but not limited to; mobility concerns, fine-motor skills, and gross-motor skills. Staff members are trained in providing these physical supports. Per 245D.071, subd. 5, each participant’s SPA, IAPP, and SMA are reviewed annually during a team review meeting and revised as needed to reflect current risk factors and protective interventions, and service needs.</p> <p>If a participant has emotional health needs, the supports required will be in that individual’s SPA, SMA, and IAPP. Staff members will assist in the administration of medications as needed. PAI provides training to staff in medication administration. All reasonable accommodations are made for participants regarding their disability.</p> <p>Handrails are provided in main hallways, hallways are kept free of debris and spills, and sidewalks are kept free of snow and ice.</p>
9.	<p><b>Describe the range of adaptive/maladaptive behavior(s) of participants receiving services:</b></p> <p>At PAI, we work with participants with a wide variety of adaptive/maladaptive behaviors such as verbal and/or physical aggression (ranging from mild to severe), property destruction, and self-injurious behaviors.</p>
10.	<p><b>How will the program reduce the potential of abuse and/or harm to participants related to the adaptive/maladaptive behavior(s) of the participants receiving services?</b></p> <p>Staff receive yearly training on de-escalation techniques, permitted actions, and our policy on EUMR’s and when they can be used. Everyone served at PAI has a SPA, SMA, and IAPP on file that outlines any behavioral supports required. Per 245D.071, subd. 5, each participant’s SPA, IAPP, and SMA are reviewed annually during a team review meeting and revised as needed to reflect current risk factors and protective interventions, and service needs.</p> <p>At PAI, we have mental health/behavioral support professionals to whom we can refer individuals if needed. These professionals are uniquely trained to assess categories of adaptive/maladaptive behavior and offer positive support strategies for participants.</p>
11.	<p><b>Describe the need for specialized programs of care for participants receiving services:</b></p> <p>The participants supported at PAI may need a wide variety of specialized programs of care depending on their unique circumstances. These programs may include environmental safety, supervision requirements, communication support, medication administration and health-related support, and personal cares support.</p>
12.	<p><b>How will the program reduce the potential of abuse and/or harm to participants related to the need for specialized programs of care for the participants receiving services?</b></p>

	<p>The facility is professionally cleaned on a regular basis. Spills or obstacles are cleaned or removed promptly. The program hallways are equipped with railings and participant restroom areas are accessible. The emergency exits are equipped with alarms. All visitors are required to sign-in. There are yellow lines painted on the parking lot to identify where vans should load and unload for the safety of participants. PAI employs a maintenance worker who is available 3 days/week to address any maintenance concerns. Fire drills are held quarterly. Fire extinguishers are placed in multiple locations throughout the facility. Severe weather drills are held yearly.</p> <p>The facility employs Lead Direct Support Professional Staff and Direct Support Professional Staff whose primary responsibilities include ensuring that all participants are accounted for. Everyone’s specific needs for supervision are outlined in their SPA, SMA, and IAPP. Per 245D.071, subd. 5, each participant’s SPA, IAPP, and SMA are reviewed annually during a team review meeting and revised as needed to reflect current risk factors and protective interventions, and service needs.</p> <p>Staff members are trained in medication administration. PAI passes medication and treatment orders under the supervision of an RN consultant.</p> <p>Hoyer lifts are available to assist participants in transferring for personal cares. Staff are trained on how to physically assist participants with personal cares.</p>
<p>13.</p>	<p><b>Describe the need for specific staff training to meet individual service needs:</b></p> <p>Minnesota Statutes, Chapter 245D, requires specific and measurable training for staff members. Staff members are required to have specific amounts of education, training, and experience in order to hold designated positions at PAI.</p>
<p>14.</p>	<p><b>How will the program reduce the potential of abuse and/or harm to participants related to the need for specific staff training designed to meet individual service needs?</b></p> <p>Training is designed to ensure that staff members are competent through education, training, and experience to work with people with intellectual and developmental disabilities. In addition to required training, PAI has a Training Manager who provides additional training and support based upon PAI’s unique needs as an organization.</p>
<p>15.</p>	<p><b>Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to participants receiving services:</b></p> <p>There are no substantiated claims of maltreatment at PAI Commerce.</p> <p>If there is suspected or substantiated maltreatment, PAI conducts internal reviews whenever there is a report of suspected maltreatment of vulnerable adults within our program. PAI also conducts internal reviews of incidents.</p>
<p>16.</p>	<p><b>How will the program reduce the potential of abuse and/or harm to participants related to the knowledge of previous abuse?</b></p> <p>Internal reviews help PAI with program oversight. PAI can identify trends/patterns and take measures to respond to any identifiable tasks. PAI can also preemptively plan to reduce the potential for abuse and/or harm by systemically conducting internal reviews of all incidents on a regular basis. All staff members are trained on the “Reporting of Maltreatment of Vulnerable Adults Act” upon hire and annually thereafter.</p>

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**Physical Plan Assessment:**

1.	<p><b>Describe the condition and design of the facility as it relates to the safety for the participants receiving services:</b></p> <p>The facility is a 14,435 square foot building that contains offices, classrooms, a participant break space/sensory room, breakroom, bathrooms, kitchen, a production floor, a small warehouse, and storage rooms. The building is licensed to provide support for 151 participants. PAI Commerce is one level. The facility has five doors that open to the outside and an additional loading dock sliding garage-style door. The facility is maintained in excellent condition and is structurally sound.</p>
2.	<p><b>How will the program reduce the potential of abuse and/or harm to participants related to the condition and design of the facility in terms of safety for participants receiving services?</b></p> <p>The facility employs Lead Direct Support Professional Staff and Direct Support Professional Staff whose primary responsibilities include ensuring that all participants are accounted for. Some individuals may be assigned more support during times of transition as needed. The program’s main hallway are equipped with hand railings.</p> <p>The facility is professionally cleaned on a regular basis. Spills or obstacles are cleaned or removed promptly.</p> <p>Fire drills are held quarterly. Fire extinguishers are placed in multiple locations throughout the facility. Severe weather drills are held yearly.</p>
3.	<p><b>Describe any areas of the facility that are difficult to supervise:</b></p> <p>Commerce has multiple bathrooms throughout the building that are used independently and without supervision by participants unless otherwise noted within their support plan. There is frequent movement through the building each day during transition times which make the hallway areas extra busy and more difficult to supervise each individual person. There is a designated smoking area near the back of the building that may be utilized by participants. There is a participant break space/sensory room that is available for use when a participant chooses to separate from the group. This room does not have a door. Participants may access these break spaces independently and may remain without supervision unless otherwise noted within their program plan.</p> <p>The desk at the building’s front entrance is typically staffed two days per week. There are two Program Supervisors employed at PAI Commerce, whose offices are in auditory range of the front entrance.</p>
4.	<p><b>How will the program reduce the potential of abuse and/or harm to participants related to the areas of the facility that are difficult to supervise?</b></p> <p>The facility employs Lead Direct Support Professional Staff and Direct Support Professional Staff whose primary responsibilities include ensuring that all participants are accounted for. Staff have keys available for all bathrooms and can enter as concerns arise. Individuals who choose to use break areas are checked on per each person’s program plan and no less than every 15 minutes.</p> <p>The front door remains unlocked during programming hours. There are two sets of sliding doors at this entrance that are solely operated by handicap accessible buttons nearby each. There is a Ring camera hung up outside these doors that visitors can ring for service. On the front desk, there is a clearly labeled binder</p>

	<p>that indicated all guests need to sign in and out. There are two Program Supervisors employed at PAI Commerce, whose offices are in auditory range of the front entrance.</p>
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**Environmental Assessment:**

<p>1.</p>	<p><b>Describe the location of the facility including information about the neighborhood and community where the facility is located:</b></p> <p>PAI Commerce is in a primarily industrial area of a metropolitan suburb, White Bear Lake. It sits at the end of a cul-de-sac near many other businesses and adjacent to a residential area.</p>
<p>2.</p>	<p><b>How will the program reduce the potential abuse and/or harm to people related to the location of the facility, including factors about the neighborhood community?</b></p> <p>Staff members take attendance and assist other staff members as needed in monitoring and supervising participants. Staff members are trained on the supervision requirements for participants. Staff members are present during hours participants are present.</p>
<p>3.</p>	<p><b>Describe the type of grounds and terrain that surround the facility:</b></p> <p>The parking lot is to the North and East of the building. The parking lot entrance is located to the Northeast. There is a residential area including a pond to the South of the building.</p>
<p>4.</p>	<p><b>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?</b></p> <p>Staff are present when people are exiting and entering the building at peak transportation times. De-icing agents are used on the parking lot to reduce ice buildup. Participants receive orientation to the building and grounds upon service initiation.</p>
<p>5.</p>	<p><b>Describe the type of internal programming provided at the program:</b></p> <p>Programming provided at the facility ranges from enrichment classes such as cooking to healthy boundaries. Many participants work on-site on the production floor.</p>
<p>6.</p>	<p><b>How will the program reduce the potential for risk and/or harm to participants through the type of internal programming provided at the program?</b></p> <p>Some class offerings, such as healthy boundaries, may reduce the potential for abuse or harm. Staff members are trained on how to supervise participants and meet their needs. Opportunities for community integration may help build functional skills that reduce the susceptibility to abuse.</p>
<p>7.</p>	<p><b>Describe the program's staffing pattern:</b></p> <p>The program hours for PAI Commerce are from 7:30AM – 1:00PM and the building is accessible from 7:00AM – 3:00PM. Lead DSPs are scheduled from 7:00AM or 7:15AM to 3:00PM or 3:15PM, respectively. DSPs are scheduled from 7:30AM – 1:45PM. Program Supervisors usually work between 7:00AM and 3:30PM. If staff need to miss work, they are instructed to call prior to the start of the program day.</p>

	<p><b>How will the program reduce the potential of abuse and/or harm to participants through the program's staffing pattern?</b></p> <p>Programming is provided Monday through Friday. The entrance through which participants enter the facility consists of two sets of sliding glass doors. The interior doors that open from the foyer to the interior of the facility are open from 7:30AM to 3:00PM Monday through Friday. The staffing needs of person served are assessed prior to admission to the program.</p> <p>8. If the program is unexpectedly closed on a day of scheduled operation due to severe weather, the program supervisors will attempt to reach the home of each participant scheduled to attend PAI that day and our transportation partner, Newtrax, will not pick up anyone. There is a Ring Doorbell at the front bussing door that will be utilized by the program director and program supervisors to ensure that no participants show up onsite by mode of alternate transportation.</p> <p>If staff call-in for a shift or need to leave due to an emergency, Program Supervisors will adjust staffing throughout the building based on assessed needs and staff training. Program Supervisors are available to provide direct support as needed. In addition, PAI maintains a list of substitute staff who help to pick-up open shifts.</p>
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**Each Program Must Ensure That:**

1. Participants receiving services are provided with an orientation to the Program Abuse Prevention Plan (PAPP). This orientation must be within 24 hours of admission or within 72 hours for individuals who would benefit from a later orientation.
2. The Program Director, Vice President of Operations, President and Operations Committee of the Board of Directors must review and approve the PAPP at least annually.
3. A copy of the PAPP must be posted in a prominent place in the facility and be available upon request, to mandated reporters, participants receiving services, and legal representatives.
4. The PAPP must include a statement of measures to be taken to minimize the risk of abuse to vulnerable adults 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 licensed services.
5. If the assessment indicates that the vulnerable adult does not need specific risk reduction measures in addition to those identified in the PAPP, the Individual Abuse Prevention Plan (IAPP) must document this determination.
6. In addition to the PAPP, the IAPP must be developed for each new participant receiving services. A review of the IAPP must be done as part of the review of the program plan. The participants receiving services must participate in the development of the IAPP to the best of their abilities. All abuse prevention plans must be reviewed and updated annually.

Cortney Kelly  
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 Program Director

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 Signature

7/17/2025  
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 Date

Alicia McCallum  
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 Chief Operating Officer

Signed by:  
  
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 Signature

7/22/2025  
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 Date

Mike Miner  
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 President

DocuSigned by:  
  
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7/30/2025  
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 Date

