

## Program Abuse Prevention Plan

Program:	Oxford Nook Apartment
Address:	225 Oxford Court, Unit B (formerly named 1030 Oxford Avenue) Pine River MN 56474
Date plan developed:	New 11/29/18; Revised for AOS 6/2019, Revised 11/1/19, Updated 12/1/19, 12/1/20, 3/30/2021, 12/1/21, 10/1/2022

### 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. Previous PAPPs are stored at the main office.
- D. If the assessment indicates that the vulnerable adult does not need Support Plan 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 the program plans to serve:**  
*This program service adults (ages 18 and up) in our adult foster care community residential settings. We have served minors with a variance. The age range in this unit is 29-42 years of age.*
2. **What Support Plan specific measures has the program taken to minimize the risk of abuse to people as related to the age of people receiving services?**  
PRGH Inc. provides each individual with their own bedroom. Bedrooms and bathrooms have locks for privacy. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum and IAPP of each person. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. Staff has been trained on the Vulnerable Adult

Act, Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

**3. Gender of persons the program plans to serve:**

PRGH Inc. serves person of any gender or gender identity. There are two females in this unit.

**4. What Support specific measures has the program taken to minimize the risk of abuse to people as related to the gender of people receiving services?**

*PRGH Inc. provides each individual their own bedroom. Bedrooms and bathrooms all have lockable doors for privacy. Staff knock before entering or opening closed doors. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum and IAPP of each person. Staff has been trained on the Vulnerable Adult Act, Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.*

People are only able to go into someone else's room with permission from the person whose room it is. Privacy is also assured when using the bathroom by closing the door and when talking about concerns with a person in a private area. A bedroom or bathroom is used for self-stimulating sexual activities.

**5. Describe the range of mental functioning of persons the program plans to serve:**

PRGH Inc. supports individuals with a diverse range of mental functioning levels including low mental functioning with severe developmental disabilities to high levels of mental functioning with mild DD. The people served in this home have a high mental functioning with mild DD and are independent in most ADLs.

**6. What Support specific measure has the program take to minimize the risk of abuse to people as related to the mental functioning of people receiving services?**

*PRGH Inc. staff are present at all times when the persons served are present unless stated in their Support Plan Addendum. Staff are trained in the self-management assessment of each individual and know their strengths and limitation due to mental functioning. There is awake overnight staff via Alternate Overnight Supervision (AOS) in place to respond as needed during the night. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. Staff has been trained on the Vulnerable Adult Act, Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.*

In this home, staff will provide care and support for all services including but not limited to ADLs and IADLs.

Alternate Overnight Supervision is used in this unit during normal sleeping hours. This means that one wake staff is providing supervision to this unit via AOS and providing awake supervision overnight in the adjacent unit in the same building. The units are connected by an internal fire door. The persons receiving AOS during normal sleep hours have high mental functioning. They can summon support through a telephone call or an internal doorbell.

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

*PRGH Inc. serves persons with a wide range of physical and mental health needs and diagnosis. This home is handicap accessible.*

The physical diagnoses at the home include: Mild intellectual disability, Mild CP, Scoliosis, Thoracolumbar Spine, Functional tremor, Renaud's Syndrome.

The emotional health related diagnoses of people in this home include: ADHD, Depressive Disorder, Disruptive Behavior disorder, ODD Unspecified psychosis; Psychotic Disorder, Schizoaffective Disorder tremors, unspecified obsessive-compulsive and related disorder.

**8. What Support specific measures has the program take to minimize the risk of abuse to people as related to the physical and emotional health of people receiving services served?**

*PRGH Inc. staff are trained on the physical and emotional health of all persons upon hire. Staff are trained on the self-management assessments and IAPP of each individual. One staff is on duty during waking hours and one sleep or awake staff during the night (except at the sites where AOS is used) to assist with the care needed related to physical and emotional health of the persons receiving services. Additional staff is available on-call as needed to assist with behavioral or behavioral or emotional health issues. Staff are trained in medication administration, first aid and CPR. Staff are trained on the self-management assessments, positive support strategies, Support Plan, Support Plan Addendum, and IAPP of each person. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. Staff has been trained on the Vulnerable Adult Act, Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies. PRGH has an RN supervising health service who has knowledge of the physical and emotional health status and needs of people receiving services.*

Staff in this home are trained on the diagnosis and related treatments of people being served. The persons being served meet with the psychiatrist or other mental health, or medical providers as directed. Staff are trained to administer medications, though some medications are self-administered per Support Plan Addendum. Staff are present during waking hours when people who receive services are at home (unless plan allows for home-alone time) to address physical or emotional concerns and Alternate Overnight Supervision is used in this unit during normal sleeping hours. This means that one awake staff is providing supervision to this unit via AOS and providing awake supervision overnight in the adjacent unit in the same building. The units are connected by an internal fire door. A RN is available for consultation for medical concerns. Regular physical health monitoring and health needs are met as per the SUPPORT PLAN Addendum. The home practices regular tornado and fire drills.

**9. Describe the range of adaptive/maladaptive behavior(s) of persons the program plans to serve:**

*PRGH Inc. serves persons with a wide range of adaptive/maladaptive behaviors. All persons served participate in activities of daily living and instrumental activities of daily living according to their adaptive behavior skills which includes conceptual, social, and practical skills that all people learn in order to function in their daily lives. Staff are trained in positive support strategies. Staff is available to assist with maladaptive behaviors.*

The range of maladaptive behaviors in this home include history of aggression and verbal aggression. The range of adaptive behaviors in this home include completing crafts and hobbies, talking, and

socializing with family and friends on the phone or in person, reading, dancing, watching TV and playing video games, playing a keyboard, completing daily ADLs, participating in outcomes and social activities.

**10. What Support 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 served?**

*PRGH Inc. staff are trained on the adaptive/maladaptive behaviors upon hire. Staff are trained on the self-management assessments and IAPP of each individual. One or two staff are on duty during waking hours and one awake or asleep staff during the night (except at the locations where AOS is used) to assist with the care needed related to adaptive/maladaptive behaviors of the persons receiving services. Additional staff is available on-call as needed to assist with target symptom issues. Staff are trained in medication administration, first aid, and CPR and positive support strategies. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff has been trained on the Vulnerable Adult Act, Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.*

Staff are trained in positive support strategies including de-escalation techniques. Verbal techniques are emphasized to redirect people. They are trained in EUMR for emergencies. Staff encourage adaptive and positive behaviors. Awake staff are present during the day when people who receive services are at home except for when home alone time is allowed per individual plans and AOS is used during normal sleeping hours. Alternate Overnight Supervision is used in this unit during normal sleeping hours. This means that one wake staff is providing supervision to this unit via AOS and providing awake supervision overnight in the adjacent unit in the same building. Individuals use the telephone or an internal doorbell to summon AOS staff. The units are connected by an internal fire door.

**11. Describe the need for Support specialized programs of care for persons the program plans to serve:**

*PRGH Inc. serves persons with a variety of Support specialized care programs including but not limited to the following: Support specialized diets for sodium or carb/calorie restrictions; diabetic diets and diabetic care; Support specialized skin care regimens; tube feeding; catheterization; mechanical lifts; accessible homes; PT/OT/Range of motion programs; seizure management; complex medical needs; cardiac conditions; visual or hearing deficits; and behavior support plans. Support Specialized care needs will be stated in the Support Plan Addendum.*

Support specialized treatment for this home includes those treatments indicated in their records.

**12. What Support specific measures has the program taken to minimize the risk of abuse to people as related to the need for Support Specialized programs of care for people receiving services?**

*PRGH Inc. staff are trained on the physical and emotional health of both persons upon hire. Staff are trained on the self-management assessments and IAPP of each individual. One staff is on duty during waking hours and one sleep or awake staff during the night (except at the locations where AOS is used) to assist with the care needed related to needs of the persons receiving services. Additional staff is available on-call as needed to assist with any issues. Staff are trained in positive support strategies, medication administration, first aid, CPR and first aid for choking. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff has been trained on the Vulnerable Adult Act, Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.*

Awake staff are present during the day when people who receive services are at home except for when home alone time is allowed per individual plans and AOS is used during normal sleeping hours.

Alternate Overnight Supervision is used in this unit during normal sleeping hours. This means that one

awake staff is providing supervision to this unit via AOS and providing awake supervision overnight in the adjacent unit in the same building. The units are connected by an internal fire door.

13. **Describe the need for support specific staff training to meet individual service needs:**  
Other than the areas already mentioned, and the staff training required by MN Statutes, chapter 245D, there is not additional staff training needed.
14. **What Support specific measures has the program taken to minimize the risk of abuse to people as related to the need for Support Specific staff training designed to meet individual service needs?**  
*PRGH Inc. staff are trained on all the individual service needs of persons served during orientation and additional training is provided as needs change. Staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. One or two staff are on duty during waking hours and one sleep or one awake staff during the night (except at the locations where AOS is used) to assist with the individual service needs of the persons receiving services. Additional staff is available on-call as needed to assist with any service need that arises. Staff are trained in positive support strategies, medication administration, first aid, CPR and first aid for choking. Staff are trained in all areas required by MN Statutes 245D. Staff has been trained on the Vulnerable Adult Act, Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.*  
Awake staff are present during the day when people who receive services are at home except for when home alone time is allowed per individual plans. Alternate Overnight Supervision is used in this unit during normal sleeping hours. This means that one awake staff is providing supervision to this unit via AOS and providing awake supervision overnight in the adjacent unit in the same building. The units are connected by an internal fire door. Additional staff is available on-call as needed to assist with any service need that arises.
15. **Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to people receiving services:**  
*In PRGH Inc., if persons being served have a history of previous abuse and if we know of it, staff are informed if we are given consent.*  
There is a sense that some people receiving services may have had abuse in their past but there is no confirmation of that or specific knowledge of previous abuse to people living in the home.
16. **What Support specific measures has the program taken to minimize the risk of abuse to people as related to the knowledge of previous abuse?**  
*PRGH Inc. staff are trained on the self-management assessments, Support Plan, Support Plan Addendum, and IAPP of each person. Staff has been trained on the Vulnerable Adult Act, Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.*

#### **PHYSICAL PLANT ASSESSMENT:**

1. **Describe the condition and design of the facility as it relates to safety for the people receiving services:**  
This home was built in 2018 and is completely handicap accessible. There are 2 bedrooms in one unit and 4 in the adjoining one. In the apartment unit, there is a kitchen/dining/living room space with a sliding glass door that open onto a shared courtyard. The garage is shared but there are two separate

doors into the unit. There is a staff med room, bathroom and 2 bedrooms off the hall. Severe weather shelter is shared and is in the adjoining unit in the laundry room.

In the adjoining home (Unit A), there are four bedrooms, two down the hall from the dining area and two off the living room area. The dining/living room area is the hub of the house with the kitchen off to the north side. The hall to the east has two bedrooms, a bathroom and staff/med room. There is a shared courtyard facing south. There is a bathroom off the living room. There is an additional sitting area south of the living room, with a closet, administrative office and laundry room adjoining. The laundry room also serves as the severe weather shelter. The two-car garage is attached and shared with the adjoining unit.

Safety: The home has a fire alarm system per code. There are carbon monoxide detectors in the home per state law. All entrances/exits are accessible. The apartment unit, served by AOS, is accessible through an internal doorway between staff med rooms/offices so the staff does not need to leave the building to respond to wants and needs there. Staff are out of sight of the main unit if in the apartment but within hearing distance of the main unit.

AOS is used in this unit. That means during sleeping hours, if staff support or response is needed, awake staff in the adjoining unit will respond. The units are connected by an internal fire door, so staff do not need to leave the building to respond. Staff will be out of sight of main unit until during response, but a doorbell is used to summon AOS staff. If response need is greater than 10 minutes, staff will call in additional support by calling the on-call supervisor or on-call DSP.

**2. What Support 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?**

The house is handicap accessible. The program will maintain the fire/carbon monoxide alarms and fire extinguishers. Fire drills are implemented monthly and tornado drills are implemented quarterly. The apartment unit, served by AOS, is accessible through an internal door so the staff does not need to leave the building to respond to wants and needs there. Staff are out of sight of the main unit if in the apartment during AOS but within hearing distance. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. The foster care licensor inspects the home. The meds are locked in med cabinets. One person keeps their med wheel in their bedroom; however, the med wheel only allows one dose to be dispensed when the alarm goes off. Staff keep the entrances clear and free of snow. There are emergency shut offs for the gas and water. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and the PAPP for this location; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies. All entrances/exits have outdoor lights for night use.

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

The outside area around the house is difficult to supervise. Persons receiving services may use their rooms in private. This makes them a challenge to supervise. The garage is difficult to supervise. The Oxford Nook unit, served by AOS, is accessible through an internal door so the staff does not need to leave the building to respond to wants or needs there. Staff are out of sight of the apartment unit but have quick, easy access through the connecting door.

**4. What Support 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 go outside to check on persons receiving services if they are outside beyond the normal amount of time. They will accompany those less stable when outside. When there is reason to be concerned by the sounds or lack of sounds in a bedroom or bathroom, the staff will knock on the door to check on the person. If needed, during the hours of sleep (as indicated in their Support Plan Addendum), staff will check on persons quietly to not disturb their sleep. The apartment unit, served by AOS, is accessible through an internal doorway so the staff does not need to leave the building to respond to wants or needs there. Alternate Overnight Supervision is used in this unit during normal sleeping hours. This means that one awake staff is providing supervision to this unit via AOS and providing awake supervision overnight in the adjacent unit in the same building. The units are connected by an internal fire door. Staff has been trained on the Vulnerable Adult Act, Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies. The home has video surveillance cameras in common areas of the home to record images for future identification of individuals and to assess circumstances in the event of legal, criminal, or policy violations, incidents, or emergencies. The garage interior and exterior of the unit have cameras.

**ENVIRONMENTAL ASSESSMENT:**

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

The Pine River Group Home is located in Pine River, a town of 975 people. It is in a residential area. It has a few neighboring homes. The town has many local services used by the persons served including library, grocery store, beauty/barber shops, clinic dentist, eye doctor, churches, banks, DAC, and other stores. The closest hospital is about 30 miles away. There is a local ambulance and fire department. Air ambulance service is available to larger hospitals. The community includes a vocational services agency, Pine River Area DAC.

**2. What Support 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?**

People who we serve are always accompanied by staff in the community unless the Support Team has determined, and it is in the individual plan of care documents, that it is a reasonable risk for the person to be alone in the community for a designated amount of time or activity. Transportation is provided to and from the community as needed. Reports of concern about a person we serve from the community are investigated. Staff are trained in IAPP, Support Plan, Support Plan Addendum, and the Self-Management Assessment and are aware of what is happening around the home to insure people we serve are safe outdoors. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

**3. Describe the type of grounds and terrain that surround the facility:** The home is located on a cul-de-sac off the main road. The grounds around the home have a parking area and a grassy yard. There are trees in and surrounding the yard and a wooded area adjacent. The road is in a residential neighborhood and generally does not have heavy traffic.

**4. What Support 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 assist people we serve who are unstable on their feet when the terrain is sloped or when they terrain could be slippery due to the weather conditions. The driveway is plowed of snow in the winter. The walkways are shoveled of snow. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

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

Each person we serve has individual supports to develop their skills and abilities to the best of their abilities. All persons served participate in a day program or work. People we serve are supported to meet their individual needs and preferences and to insure their health and safety. Internal programming includes training and assistance to complete ADLs and IADLs including but not limited to dressing bathing, toileting, and meal preparation, paying bills, shopping, and communication.

**6. What Support specific measures has the program taken to minimize the risk of abuse to people through the type of internal programming provided at the program?**

Staff are trained on meeting each persons' served needs, preferences, rights and to ensure their safety and health. Staff will assist people in being as independent as possible in the activities of daily living. Staff are trained in CPR, first aid and all other required topics according to MN statute 245D. Staff has been trained on the Vulnerable Adult Act, Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

**6. Describe the program's staffing pattern:**

Saturday and Sunday (and days DAC is closed) 10 am – 7 pm.  
Monday – Friday 6:30 am – 8:30 am and 2:30 pm – 8:30 pm.

The home has single staff coverage at most times when persons we serve are awake in the morning or when they get up for the day. There is single staff coverage at most times in the afternoon after work and into the evening on weekdays and on weekends from morning until bedtime. During normal sleep hours, this home is supported through AOS. Awake, overnight staff in the adjoining unit provides AOS during sleep hours. The persons served in this unit rarely need or desire staff support during normal sleeping hours.

**8. What Support specific measures has the program taken to minimize the risk of abuse to people through the program's staffing pattern?**

The program provides staff during most waking hours to assure that medical appointments, daily living activities, and other preferred activities can be accommodated. Staff in the adjoining unit is able to assist in a crisis or emergency and additional support can be sought as needed. The program has an on-call person in case a staff person has an emergency. During AOS, staff can access the unit through an internal doorway, so the staff does not need to leave the building to respond to wants or needs here.

An administrative office is in the building with additional staff available if needed during office hours. Staff are trained in CPR, first aid and all other required topics according to MN statute 245D. Staff has been trained on the Vulnerable Adult Act and Maltreatment of Minors Act, and this PAPP; staff will take steps to prevent abuse, take corrective action and immediately report maltreatment according to PRGH, Inc. policies.

During an emergency resulting in a staffing crisis, other staffing patterns or methods may be

