

**PROGRAM  
ABUSE  
PREVENTION  
PLAN  
(P.A.P.P.)  
2023-2024**

## **INTRODUCTION:**

The persons served by Waivered Services are considered to be vulnerable adults as defined by the Minnesota Department of Human Services and are susceptible to abuse or neglect. It is the policy of West Central Industries to:

- a) Report maltreatment of vulnerable adults,
- b) Provide a Program Abuse Prevention Plan,
- c) Provide an Individual Abuse Prevention Plan, and
- d) Participate in the development of a Community Service and Support Plan Addendum.

A report of suspected abuse or neglect shall be reported and investigated. The mandated reporter shall follow the procedure outlined in the policy and procedure on reporting and review of Maltreatment of Vulnerable Adults.

### **Population Assessment:**

West Central Industries occupies a one-story building, owned and operated by WCI, which provides assessment, rehabilitation and employment services to adult males and females who have a diagnosed disability. Persons eligible for services must be 18 and older. West Central Industries serves a geographic area of 19 counties, with residential services provided by others in Willmar and surrounding communities.

WCI provides services to persons with mild, moderate, severe or profound levels of developmental disabilities, mental illness, and other physical or mental disabilities. These include: seizures, ambulatory impairments, traumatic brain injury, visual or hearing impairments, or other medical conditions.

West Central Industries Waivered Services provides services to 97 adults, 43 men and 54 women. The ages of these persons range from 22 to 75. Forty-five of the persons in the Waivered Services Program are diagnosed with mild mental retardation, 27 with moderate mental retardation, and 2 with severe mental retardation. In this group we have 4 individuals with Down Syndrome. Six persons have had traumatic brain injuries. Three persons diagnosed with autism, 1 person with obsessive compulsive disorder, 1 person with bipolar disorder-cyclothymic disorder, 1 with schizophrenia disorder, 1 with personality disorder, 1 with other anxiety disorders, 3 with other psychotic disorder-schizoaffective. 2 with other physical conditions, 2 with depressive disorders-major dysthymic, unspecified and 2 epilepsy/seizure disorder.

### **What specific measures has the program taken to minimize the risk of abuse to people as related to the age of people receiving services?**

All staff will be kept up to date on each person's served Individual Abuse Prevention Plan, Self-Management Assessment, and Support Plan Addendum. This information is reviewed at least annually. Adjustments are made to each person's programming to accommodate their changing needs due to aging. WCI has staff on the premises at all times who are trained in the Vulnerable Adult Act, and will follow reporting requirements and procedures found within WCI Policy and Minnesota Statute.

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

Each person served will be educated on their service-related and protection related rights at least annually. Persons receiving services will have the right to be treated with respect and fairness, and will not be excluded or treated inferiorly based on gender. Staff are trained on each person served, Support Plan Addendum, Individual Abuse Prevention Plan, Self-Management Assessment and review it annually and as updated. Persons served of each gender will be given equal opportunities and attention. WCI has staff on the premises at all times who are trained in the Vulnerable Adult Act, and will follow established maltreatment reporting requirements and procedures found within WCI Policy and Minnesota Statute.

**What specific measures has the program taken to minimize the risk of abuse to people as related to the mental functioning of people receiving services?**

All staff are kept up to date on each person's served Individual Abuse Prevention Plan, Self-Management Assessment and Support Plan Addendum. This information is reviewed at least annually and as update, changes are made to each person's programming to accommodate their changing needs.

We have a smaller Waivered Services senior's room where we have individuals who may need more assistance and additional time to complete various tasks. Some of these individual's needs are changing due to the onset of dementia and/or Alzheimer's or other health issues. Some are also attending for socialization with less focus on work, instead of opting to retire. They look forward to the socialization.

Of the 97 Waivered Services clients, 6 persons utilize wheelchairs for mobility, 5 persons utilize walkers, and 0 person utilizes a cane for mobility. 86 persons are independent in mobility. 19 persons have seizure disorders. All have good seizure control through medications. 35 persons have allergies, 11 persons are diabetic, 10 persons are hearing impaired. 1 person is legally blind and 10 persons are or have been physically assaultive or abusive, 11 persons are or have been verbally assaultive or abusive.

**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 served?**

Staff assist and serve each person served based on their individual needs. Staff provide supervision within the ratio of persons served at all times. For those persons served that have (unsupervised) time during breaks, Staff are aware of where they are and continue to do periodic checks on them during this time. Staff are available to listen to person served when they are in need. Staff also accommodate work schedules. Staff are trained on each persons served Support Plan Addendum, Individual Abuse Prevention Plan and Self-Management Assessment and review it annually and as updated. Staff are trained in Positive Behavior Inventions, CPR, First Aid, Foundations of Person-Centered Support, use of mechanical lifts. Staff are trained in Mandating Reporting- The Vulnerable Adult Act and Maltreatment of Minors. Staff follow established maltreatment reporting requirements and procedures found within WCI policy and Minnesota Statute.

**Describe the range of adaptive/maladaptive behavior(s) of persons the program serves?**

WCI has 10 persons that are or have been physically assaultive or abusive, 11 persons who are or have been verbally assaultive or abusive and 2 persons with behavior programming.

**What specific measures has the program taken to minimize the risk of abuse to people as related to be adaptive, maladaptive behavior(s) of the people receiving services served?**

Staff assist and serve each person served based on their individual needs. Staff provides supervision within the ratio of persons served. Staff are available to listen to person served when they are in need. Staff are trained on each person served, Support Plan Addendum, Individual Abuse Prevention Plan and Self-Management Assessment are reviewed annually and as updated. Staff are trained to observe for antecedent behaviors which may lead to maladaptive behaviors. Staff are trained in the area of the Positive Support Rule and Positive Support Strategies.

The need for specialized programs of care for persons served include:

- Transportation arrangements, assisting with getting on and off transportation vehicle lift for wheelchair person served,
- Medication administration
- Toileting, adaptive lifts for transferring, bathroom and hygiene care

- Following dietary guidelines, assisting with warming foods, cutting of foods and providing supervision while eating
- Diabetic Protocols
- Assistive technology
- Seizure protocol
- Fluid intake

**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 staff are trained on each person's served Individual Assessment Prevention Plan, Self-Management Assessment and Support Plan Addendum. This information is reviewed annually and as updated. WCI has staff on the premises at all times who are trained in the Vulnerable Adult Act and will follow reporting requirements and procedures within WCI Policy and Minnesota Statute.

**Describe the need for specific staff training to meet individual service needs:**

Staff are trained in First Aid, CPR, Positive Behavior Interventions, Person Centered Supports, use of adaptive lifts for transferring. If the Community Service and Support Plan states a need for additional specific training for an individual, WCI will make arrangements for the training.

**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?**

All staff are trained on each persons served Individual Abuse Prevention Plan, Self-Management Assessment and Support Plan Addendum. This information is reviewed annually and as updated. WCI has staff on the premises at all times who are trained in the Vulnerable Adult Act and will follow reporting requirements and procedures within WCI Policy and Minnesota Statute. Staff has been provided the specific training as requested in the Community Service and Support Plan. Staff also continue to attend and/or participate in new training requirements as they change.

**Describe the knowledge of previous abuse that is relevant to minimizing the risk of abuse to persons served?**

No known previous abuse.

**How will the program reduce the potential of abuse and/or harm to persons served related to the knowledge of previous abuse?**

No known previous abuse.

**PHYSICAL PLANT ASSESSMENT:**

WCI was built in January 1984. In 2005-2006 WCI Willmar went through major renovations. The layout and physical condition of West Central Industries' building meets the accessibility and safety needs of the persons served at this site. Staff supervision is provided to persons served in all areas within and immediately surrounding this building. Restrooms are visible from the work pod production areas. The Waivered Services senior room has a dedicated bathroom, shower and changing area along with a sick area. The building is ADA accessible. Please refer to the attached map, identifying office space, classroom/skill training, kitchen and other work areas within West Central Industries.

**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?**

- Keep walk ways clear of debris
- Mats and rugs are placed at each entrance
- Maintain well lit rooms
- Cleaning crew supply carts are located in closet
- Cleaning supplies are stored in appropriate cabinets
- Wet floor signs are used
- Safety inspections periodically
- Safety Committee meets at least quarterly to review safety inspections checklist

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

The bathrooms are not continually supervised to protect person served privacy. Staff are aware when person served are using the bathrooms. Staff will check on persons in the bathroom if unusual condition occurs. (Ex. too much time, an unusual noise, etc.) or as identified in plan. Person served using the sick area to rest will be checked on every 15 minutes or more often as appropriate to their illness. In most cases if an individual is not feeling well, residential staff are contacted to take the individual home.

**ENVIRONMENTAL ASSESSMENT:**

West Central Industries (WCI) is located at 1300 22<sup>nd</sup> St. SW, Willmar. This area is zoned commercial, lying approximately ½ mile south from the Industrial Park area of Willmar. There is a railroad crossing approximately 3 blocks from the main entrance of WCI. This is potentially hazardous as there are trains that utilize these tracks several times throughout the day. Highway 40 runs adjacent to West Central Industries and is approximately ½ mile north from the Industries. This highway is heavily utilized, including significant truck traffic, because of its access to the Industrial Park and Jennie-O Foods Processing plant. Other buildings adjacent to this center include: G.T.A., three blocks southwest and what was the Kandiyohi County Recycling Center, two blocks southwest of this building. Central Community Transit facilities are located to the west of what was the Recycling Center. Immediately to the north of WCI is a park donated by Willmar Lions. The other land adjacent to WCI is a baseball stadium, public park with a dog park, walking paths and a water park.

**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?**

All staff are trained on person's served Individual Abuse Prevention Plan, Self-Management Assessment and Support Plan Addendum. This information is reviewed annually and as updated.

These reports identify areas person served can self-manage, overall strengths, functioning skills and abilities and behaviors or symptoms to identify whether the person's served is susceptible to abuse and what the specific measures are to be taken to minimize the risk within our scope of services.

The facility contains a paved parking lot on the east and south side. There is a patio area on the south side. The rest of the property is flat, mowed grass area. The immediate grounds of WCI are generally safe and free of any hazards for our employees with the exception of vehicle traffic. Employees utilize public, private or residential transportation. During the day programming hours, each person is provided with direct supervision by WCI staff. All staff are required to attend orientation prior to working with person served. All staff are required to attend a core of mandatory trainings.

**What 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?**

All staff are trained on persons served Individual Abuse Prevention Plan, Self-Management Assessment, and Support Plan Addendum. This information is reviewed annually and as updated.

These reports identify areas person served can self-manage, overall strengths, functional skills and abilities and behaviors or symptoms. Identify whether the person's served is susceptible to abuse and what specific measures are to be taken to minimize the risk within own scope of services.

Our sidewalks are kept clean of debris/snow, mats and rugs are placed at each entrance and staff assist individuals as they walk if needed, wheelchairs are also available if needed.

WCI offers several individual training and employment opportunities for persons based on their interest and needs. Center-based training services include hand packaging, saw shop, and shredding. Community Based Supported Employment is available at individual, crew or enclave sites in various physical locations. In addition to skill acquisition, appropriate socialization and community utilization skills are facilitated through modeling, direct teaching and role playing. Each person receiving services will have a Support Plan Addendum which reflects needs and desired outcomes and supports.

When equipment and supplies are not in use, they are stored appropriately. Persons are trained and monitored for proper use and safety of all electrical equipment. Person served will use equipment under staff supervision. Cleaning supplies are stored in appropriate cabinets, in supply rooms. Cleaning supplies will be used only when staff are present. The work areas will be kept neat and clean.

The Waivered Services Program has a minimum of 7 direct care staff providing supervision and training for its 97 individuals served. Staffing levels are adjusted as needed to maintain proper staff to person ratios. There are 4 Designated Coordinators, 1 Designated Coordinator/Director of Waivered Services Assistant and 1 Director of Waivered Services. (Designated Manager).

All staff are required to attend orientation prior to working with person served. All staff are required to attend a core of mandatory trainings. 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 governing body's delegated representative must review the Program Abuse Prevention Plan at least annually.
- C. A copy of the Program Abuse Prevention Plan must be posted in a prominent place in the facility and be available, upon request, to mandated reporters, people receiving services, and legal representatives.
- D. The plan must include a statement of measures to be taken to minimize the risk of abuse to the vulnerable adult(s) or when the need for additional measures is identified. This includes identifying referrals that are made when the vulnerable adult is susceptible to abuse outside the scope or control of the licensed services.
- E. If the assessment indicates that the vulnerable adult does not need specific risk reduction measures in addition to those identified in the Program Abuse Prevention Plan, the Individual Abuse Prevention Plan must document this determination.
- F. In addition to the Program Abuse Prevention Plan, an Individual Abuse Prevention Plan must be developed for each new person receiving services. A review of the Individual Abuse Prevention Plan must be done as part of the review of the program plan. The persons receiving services must participate in the development of the Individual Abuse Prevention Plan to the best of their abilities. All Abuse (Individual or Program) Prevention Plans must be reviewed at least annually by the support team.

\_\_\_\_\_  
Print name and title of governing body  
Or governing body's delegated representative

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Review:**

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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:**

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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:**

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

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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.