

**TSE, Inc.**  
**Program Abuse Prevention Plan**  
**Lakeridge**  
**103-105 Vadnais Blvd., Vadnais Heights 55127**

**POPULATION ASSESSMENT:**

1. **Age range of persons receiving services:**  
Approximately eighty-five percent (85%) percent of the persons are between 21 and 60 years old.
2. **How will the program reduce the potential of abuse and/or harm to people related to the age of people receiving services?**  
Individuals who require supports related to advanced age will have a plan identified within their Individual Abuse Prevention Plans.
3. **Gender of persons receiving services:**  
The persons served are nearly equally divided between male and female.
4. **How will the program reduce the potential of abuse and/or harm to people related to the gender of people receiving services?**  
There are no noted risks in this area.
5. **Describe the range of mental functioning of persons receiving services:**  
Approximately sixty percent (60%) are in the severe and profound range of developmental disability.
6. **How will the program reduce the potential of abuse and/or harm to people related to the mental functioning of people receiving services?**  
The persons are grouped in training areas considering their vulnerabilities. Physical separation of persons may be used during training to further minimize the risk of abuse or neglect. Each training area is designed to serve from 12 to 20 people. These persons are served with staff ratios ranging from 1:1 to 1:3, with an overall ratio of approximately 1:3. Ratios may be higher at times (i.e., at lunch time or if staff need to manage disruptive persons). Health and behavior consultants are utilized by the company to provide resources for training related to issues of vulnerability. In compliance with Minnesota Rules, part 9543.3000 to 9543.3090 (Rule 11), the background of new employees is reviewed for previous incident(s) of abuse or neglect to others.

The training site is organized and managed to provide the supervision each person requires. This insures people are dressed appropriately for the weather when they arrive and/or leave TSE, are supervised to protect them from sexual and financial exploitation when they are in the community, are safe in any private or public facility or vehicle, and are safe while crossing streets and/or walking in parking lots. Staff are available to manage special diets, medical needs

and emergencies that arise, and any other disruptive situations whereby people are unable to protect themselves.

**7. Describe the range of physical and emotional health of people receiving services:**

Four of the persons are not ambulatory and several need assistance due to vision, hearing and other physical impairments. Several persons have a secondary diagnosis of mental illness. Persons receive medication during training hours.

**8. How will the program reduce the potential of abuse and/or harm to people related to the physical and emotional health of people receiving services served?**

The implications of these factors are specified in the Individual Abuse Prevention Plan for each person. Staff provide assistance according to this plan.

Staff have received training in the management of disruptive and aggressive behaviors. They also have been trained in alternative communication, first aid, CPR and medication administration. For individuals who self-medicate, the Individual Abuse Prevention Plan will specify plans, if appropriate, to insure the necessary medications are taken.

**9. Describe the range of adaptive/maladaptive behavior(s) of people receiving services:**

Some people at this site display challenging behaviors, including aggression towards others, towards self and towards property. There are people who have attempted to leave the building without notifying staff.

**10. How will the program reduce the potential of abuse and/or harm to people related to the adaptive/maladaptive behavior(s) of the people receiving services served?**

Supports will be identified in each person's individual plan. The Services Coordinator is responsible for the development and evaluation of behavior programs and reviews any Behavior Intervention Report Forms and/or vulnerable adult incidents. Behavior consultants are available as needed to assist with program developments.

**11. Describe the need for specialized programs of care for people receiving services:**

Some people may require specialized care due to medical needs, including use of a wheelchair or walker.

**12. How will the program reduce the potential of abuse and/or harm to people related to the need for specialized programs of care for people receiving services?**

The implications of these factors are specified in the Self-Management Assessment and Individual Abuse Prevention Plan or CSSP-A for each person. Staff provide assistance according to this plan.

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

Based on needs identified in individual CSSPs.

**14. How will the program reduce the potential of abuse and/or harm to people related to the need for specific staff training designed to meet individual service needs?**

Staff have received training in the management of disruptive and aggressive behaviors. They also have been trained in alternative communication, first aid, CPR and medication

administration. For individuals who self-medicate, the Self-management Assessment will specify plans to insure the necessary medications are taken.

**15. Describe any knowledge of previous abuse that is relevant to minimizing the risk of abuse to people receiving services:**

The backgrounds of some persons presently served include histories of physical and sexual abuse. There have been no substantiated incidents of abuse or neglect against TSE, Inc. since the last review of this document.

**16. How will the program reduce the potential of abuse and/or harm to people related to the knowledge of previous abuse?**

Staff have received training in Vulnerable Adult requirements, including intervention and reporting of suspected maltreatment.

**PHYSICAL PLANT ASSESSMENT:**

**1. Describe the condition and design of the facility as it relates to safety for the people receiving services:**

The address of Lakeridge is 103-105 W. Vadnais Blvd. It is a two-story concrete block building approximately 4,000 square feet in the lower level of the building, with 2525 square feet of program space.

The interior design of the space is situated whereby the training areas and staff offices occupy the vast majority of the building. A hallway provides access to all areas of the building. There are four bathrooms within this space.

The space is fully accessible to persons with a disability. There are no known hazards or potential dangers in terms of building design, construction or materials.

**2. How will the program reduce the potential of abuse and/or harm to people related to the condition and design of the facility in terms of safety for people receiving services?**

The environment of each training area is designed to be free of dangerous equipment, appliances and chemicals. Fire extinguishers are located in each training room, in the center hallway, the staff and main offices. There is no sprinkler system in the building. There is a fire alarm system and fire drills are held according to the fire drill procedure. The alarm system is not monitored by an outside service. Staff will call 911 if an actual fire occurs.

The refrigerators and the microwaves are in each training room. There may be locks on the refrigerator to prevent access for people who may steal food. Others may gain access by requesting a key from staff.

Persons who are independent in their toileting skills use the bathrooms independently. Persons who need assistance and/or supervision in the restroom and/or have challenging behaviors are supervised by staff. This procedure does not restrict access to a restroom and it also respects privacy.

Persons served are supervised in other areas of the building as required by their Intensive

## Support Assessment.

The following procedures will be followed regarding hazardous machinery, tools or substances:

1. all toxic materials and/or cleaning supplies when not in use, will be kept in a locked area to which persons served do not have access; disposal will be done based on individual product specifications as noted on the label and/or SDS.
2. all medications administered at TSE, Inc. will be kept in a locked area to which persons served do not have access; medication disposal: a person's residence will be notified that a person's medication is scheduled to be destroyed and will be given the option to come and pick it up from TSE. Should the residence not respond, or reject the offer, TSE's Nurse Consultant will destroy the medication and document its destruction.
3. all sharp objects will be kept in locked areas and/or in areas to which persons served do not have access. Equipment that gets hot or presents a danger to persons will also be properly stored and the electrical plug pulled except when being used. A sharps container is available on site for the disposal of contaminated needles and other sharp objects.

Criteria for selecting, training and supervising persons who work with hazardous machinery, tools, or substances in the building or in community job sites will be as follows:

1. All persons working with hazardous machinery, tools or substances and their guardians must be informed of the potential dangers of the materials and permission must be given by the appropriate person prior to any training.
2. persons will be trained in accordance with the appropriate individual habilitation plan goal and before they are allowed to use the machinery, etc., independently or without continuous supervision;
3. Supervision of persons while using hazardous materials or equipment will be determined by their Self-Management Assessment & Individual Abuse Prevention Plan.
4. The training strategy and required supervision will be identified in writing and available to all staff who will supervise a person, including substitute staff;
5. staff who are training persons in the use of hazardous machinery, tools and substances will be properly trained by an appropriate individual prior to their training a person served; and

6. Upon entering an area with hazardous machinery, tools and substances, the potential dangers will be reviewed with the person before any training begins.
3. **Describe any areas of the facility that are difficult to supervise:**  
There are no areas that are difficult to supervise.
4. **How will the program reduce the potential of abuse and/or harm to people related to the areas of the facility that are difficult to supervise?**  
Persons served are supervised in other areas of the building as required by their Self-Management Assessment and Individual Abuse Prevention Plan

#### **ENVIRONMENTAL ASSESSMENT:**

1. **Describe the location of the facility including information about the neighborhood and community that the facility is located:**  
The Lakeridge training site is located on a frontage road near Highway 694 and Rice Street in Vadnais Heights. The surrounding area includes a variety of businesses. There is an overpass and a large lake on the east side of the building separated by approximately 100 yards of hill and shoreline. A fence separates the parking lot from the ramp/lake area.
2. **How will the program reduce the potential of abuse and/or harm to people related to the location of the facility, including factors about the neighborhood and community?**  
Staff will meet vehicles carrying persons served upon their arrival. Staff and drivers are oriented to the supervision needs of people and provide escorts from the vans accordingly.

Most persons use the entrance on the east side of the building. Some use the south entrance. The south exit is otherwise used as a secondary or emergency exit. Staff are aware of people who wander and provide supervision to ensure their safety.

When commuter vehicles arrive at the beginning of the day, all persons come immediately into the building with appropriate staff assistance. At the end of the day, the staff watch for the vehicles as they arrive and provide assistance as needed. Vehicles will not leave until all persons have been accounted for.

When people do not arrive as expected and their family and/or residential provider have not called, the staff will confirm with the driver and/or the transportation department the reason for the person's absence. Staff will call the residential provider if the transportation department does not have the information.

Each exit door is equipped with an alarm system. If a specific code is not entered prior to opening the door, the alarm sounds. This alerts staff that a person is leaving the building.

Street safety skills are practiced whenever persons are in the community. People may have specific goals in this area.

**3. Describe the type of grounds and terrain that surround the facility:**

The parking lot is located on the south and east sides of the building and persons use the east side entrance for coming and going with vehicles. There is not considerable traffic in this area during the day. The area to the north of the building slopes upwards away from the building, and does not have walkways or other easy access.

The surrounding area is considered dangerous for persons who do not have street safety skills and/or who may leave the building unattended.

There is a sidewalk where persons served board and exit vehicles. When snow covered it is very slippery and potentially dangerous.

**4. 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?**

There is a curb cut to the parking lot and all persons can safely move onto the sidewalk from the parking lot. In the winter, all sidewalks are shoveled and salt is used as necessary.

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

People served at this location receive services based on their individual needs and interests. These include, but are not limited to employment, employment supports, self-care, academics, and behavioral supports.

**6. How will the program reduce the potential of abuse and/or harm to people through the type of internal programming provided at the program?**

Skills groups routinely address issues related to safety, including training on Vulnerable Adult protections.

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

The persons are grouped in training areas considering their vulnerabilities. Each training area is designed to serve from 12 to 20 people. These persons are served with staff ratios ranging from 1:1 to 1:3, with an overall ratio of approximately 1:3. Ratios may be higher at times (e.g., at lunch time or if staff need to manage disruptive persons).

**8. How will the program reduce the potential of abuse and/or harm to people through the program's staffing pattern?**

Health and behavior consultants are utilized by the company to provide resources for training related to issues of vulnerability. In compliance with Minnesota Rules, part 9543.3000 to 9543.3090 (Rule 11), the background of new employees is reviewed for previous incident(s) of abuse or neglect to others.

9. *Describe how the program addresses accessibility issues:*

***An accessibility assessment has identified the following:***

- Physical/environmental barriers: an ADA checklist is completed bi-annually
- Attitudinal barriers: no barriers noted. Should barriers arise, employer education related to the specific barrier will be implemented
- Financial barriers: individual issues related to earnings, benefits impact; addressed through case manager, benefits options (e.g. MA-EPD, referrals to Workforce Incentives Connections for benefits analysis).
- Communication barriers: individual issues; addressed through CSSP-Addendum, alternative communication devices.
- Transportation barriers: limitations for those in wheelchairs; addressed through TSE-owned lift-equipped van and contracted services (including, but not limited to MA Providers, Metro Mobility).

**TSE WILL ENSURE THAT:**

- A. People receiving services are provided with an orientation to the program abuse prevention plan. This orientation will be within 24 hours of admission or within 72 hours for individuals who would benefit from a later orientation.
- B. The TSE Board of Directors will review the program abuse prevention plan at least annually.
- C. A copy of the program abuse prevention plan will be posted in a prominent place in TSE-Lakeridge and be available, upon request, to mandated reporters, people receiving services, and legal representatives.
- D. The plan will 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 interdisciplinary team.

**REVIEW BY TSE, INC. BOARD OF DIRECTORS:**

TSE, Inc. Board of Directors has reviewed the contents of the Program Abuse Prevention Plan for Lakeridge, 103-105 Vadnais Blvd., Vadnais Heights, MN at its regular meeting on 2/23/22.

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Signature of Board Chair

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Date

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