

**TSE, Inc.**  
**Program Abuse Prevention Plan**  
**Work Ahead**  
**1919 University Ave. W., Suite 116, St. Paul 55104**

**POPULATION ASSESSMENT:**

1. **Age range of persons receiving services:**  
Approximately ninety-five percent (95%) 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:**  
All but one of the persons served are male.
4. **How will the program reduce the potential of abuse and/or harm to people related to the gender of people receiving services?**  
The female participant was enrolled in the Work Ahead site when TSE took over the program from the previous provider. Her Support Team has determined the site to be a safe and appropriate location for her.
5. **Describe the range of mental functioning of persons receiving services:**  
One hundred percent (100%) are in the mild to moderate 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 6 to 25 people. These persons are served with staff ratios of 1:4 in-center. Ratios may be higher at times (i.e., at lunch time or if staff need to manage individual needs). 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:**  
All of the people served are ambulatory and some may need assistance due to vision, hearing and

Developed - December 15, 1993  
Revised – February 23, 2022  
Distributed – February 23, 2022

other physical impairments. Several persons have a primary or secondary diagnosis of mental illness. Persons receive medication during training hours and persons may administer their own medication.

**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. Many of the persons served have ongoing issues related to inappropriate sexual behaviors, some of which include criminal histories.

**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?**

Due to the sexual backgrounds of some of the persons served, each person requires staff supervision at all times, in all areas of the building. This requires the person to be in sight of or, momentarily, within hearing range. The level of supervision in other environments will be determined by the Support Teams based on factors present within those environments that may put the people served or people in the community at risk. Staff are trained in the unique supervision and training needs of people with sexual offense histories.

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:**

None of the people served require specialized care due to medical needs.

**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 the training site is 1919 University Ave. There are approximately 2300 square feet of space in the suite with 1400 square feet of program space. The building is of a concrete block construction. There are north and west entrances and the parking lot is on the north and west sides of the building.

The interior design of the suite is configured into four training areas and two staff work areas. There is a small storage room. Two bathrooms are located near the front door.

The space is accessible to persons with a disability. There are no known hazards or potential dangers in terms of building construction or materials. There are stairs in the building leading out the north door that may pose a risk to individuals with mobility issues. This door is an emergency exit only. There are no areas of the building that are difficult to monitor.

**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 by each door and in the kitchen. There is a 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 monitored by an outside service.

The refrigerators and the microwaves are in the kitchen area. There is a lock on one refrigerator that holds staff lunch and pop for sale.

Currently, one person requires assistance by a male staff in the restroom, all others are independent in their toileting skills. Persons are supervised while waiting to use the bathroom. This procedure does not restrict access to a restroom and it also respects privacy.

Each person requires staff supervision at all times, in all areas of the building as well as the parking area. This requires the person to be in sight of or, momentarily, within hearing range.

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;
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.

Developed - December 15, 1993

Revised – February 23, 2022

Distributed – February 23, 2022

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

The front entrance may be 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 not allowed to go to that area, or any area of the building, without line-of-sight supervision.

**ENVIRONMENTAL ASSESSMENT:**

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

The training site is located in a suite in a multi-office complex on University Ave. There is a primarily business neighborhood. University Ave and the parking lot that surrounds the building are busy during the daytime hours and present a dangerous situation for persons who do not have street safety skills and/or who may leave the building unattended.

**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.

Persons use entrances on the west side of the building. Persons served receive line-of-sight supervision in all areas of the building, as well as they parking area.

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. There is a check-off system in place to document the pick-up and drop-off of each person. 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.

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 outside the west entrance is paved. There is a sidewalk outside the North emergency exit. A smoking area is on the northwest corner of the building that is covered with patio pavers. There is moderate traffic in this area during the day.

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 outside the north emergency exit. The parking area where people enter and exit can be very slippery and potentially dangerous when snow covered.

**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?**

In the winter, the area outside the entrance is shoveled and sand/salt is used as necessary. Staff provide physical assistance to those people served as indicated in individual plans.

**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 6 to 20 people. These persons are served with staff ratios of 1:4. Ratios may be higher at times (e.g., at lunch time or if staff need to manage individual needs).

**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 updated 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-Work Ahead 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 Work Ahead, 1919 University Ave. W., St. Paul, at its regular meeting on 2/23/2022.

\_\_\_\_\_  
Signature of Board Chair

\_\_\_\_\_  
Date

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