

Northwestern Mental Health Center

Program Abuse Prevention Plan

603 Bruce St. Crookston, MN 56716

The *vision* of the Northwestern Mental Health Center, Inc., is to provide a comprehensive, integrated system of care to enhance individual and family health and well-being.

It is the *mission* of the Northwestern Mental Health Center, Inc., to provide high quality services and relationships which promote wellness and recovery so that individuals and families are successful in achieving their personal goals for an enhanced high quality of life.

We value an organization of excellence that:

- ✓ provides individualized, individual-centered services which are culturally responsive and respectful to the needs of individuals and families served
- ✓ identifies community-focused opportunities with stakeholders who are invested in the health and well-being of all community members
- ✓ encourages and supports the self-care of all
- ✓ maintains the highest high quality workforce
- ✓ utilizes an effective, progressive array of services
- ✓ fosters creativity and innovation in an inspiring environment
- ✓ provides an environment where the ethics, values, beliefs and structure is congruent with its mission
- ✓ has sustainable programming with intrinsic value to our stakeholders
- ✓ provides good stewardship over resources
- ✓ is a valued member of the community
- ✓ maintains its reputation as a Northwest Minnesota provider of choice

NWMHC Northwestern Substance Use Disorder Services may, at any given time, serve one or more individuals who are vulnerable to abuse. As a means of attempting to limit the potential for abuse of those served by our facility, NWMHC Northwestern Substance Use Disorder Services has developed and will maintain and enforce the Program Abuse Prevention Plan. This plan includes an assessment of specific aspects of the program/facility that may increase the risk of abuse and the specific steps NWMHC Northwestern Substance Use Disorder Services will take to minimize the identified risks. Anyone concerned about an area of risk not identified within the plan or who has questions or concerns related to NWMHC Northwestern Substance Use Disorder Services efforts to minimize these risks is encouraged to bring these to the attention of a staff member, to utilize the grievance policy, or to follow the policies and procedures related to the reporting of maltreatment of vulnerable adults policy as indicated at any time.

Factors for Supporting Quality of Care

NWMHC Northwestern Substance Use Disorder Services has identified the following areas as key factors related to enhancing the quality of care and decreasing the risks of abuse. They are relevant across various situations that have been identified in the assessment and include:

A. Policies and procedures: Policies and Procedures describe the manner in which services are provided and are written to ensure the personal rights of all individuals served. They are to ensure that quality of care is provided for each individual in the safest manner and environment possible. A complete policy and procedure manual is kept on the Public Folder on the server so any staff member may have access to this information at any time. A paper copy is also available as a backup should there be issues with the computer at a given time.

B. Screening and Interviewing: Staff members (students and/or volunteer) hired to provide care for individuals in NWMHC Northwestern Substance Use Disorder Services are screened and interviewed by trained staff to insure proper qualifications, reliable references and adequate training. Background checks are completed on all staff members.

C. Professional Development: Ongoing education and employee orientation are designed to enhance the skills and knowledge necessary to provide quality care, safety, and to disseminate to staff the policies dealing with vulnerable adults. All employees receive annual performance appraisals. All personnel delivering direct care are directed by supervisors who are skilled in Individual assessment.

D. Emergency Preparedness & Hazardous Materials: Any hazardous substances are stored in accordance with recommendations of regulatory agencies which mandate secure, sanitary storage areas.

E. Communications: Individuals have accessibility to medical, clinical, administrative or governing regulatory personnel. Counseling staff monitor, report, and document pertinent information on all individuals served in accordance with various credentialing and regulatory agencies. The individual has access to lines of communication both internally and externally to reporting concerns or options for personal safety/security and potential for actual neglect or abuse. The system is designed to facilitate ongoing monitoring and immediate reporting of any safety/security deficiency or any potential,

suspected or actual neglect/abuse in compliance with the Vulnerable Adult Act, Minnesota Statutes 6.557 and specifically under parts 9555.8000 to 9555.8500 regarding the reporting of maltreatment of vulnerable adults in licensed facilities.

F. Privileging and Credentialing: Security precautions of a general nature are present and operative as specified by credentialing and regulatory agencies. Clinical staff is further governed by their respective Codes of Ethics for their professions.

G. Abuse and Neglect Reporting: Facility programs are committed to provide an environment for individuals that encourage wellness, growth and recovery. In enrolling and attending to individuals receiving services, staff members will provide intellectual stimulation and encouragement of the feeling of self-worth. Staff, Students and Volunteers carry the responsibility of ruling out abuse and neglect and will fully investigate any signs observed on admission or in the course of care of possible abuse or neglect.

H. Community Involvement: Social workers, relatives, and other interested persons are encouraged to visit the program to observe or question the procedures. Individuals are encouraged to utilize the resources of the community for activities, forming relationships, engaging in religious involvement and Self-Help groups. Staff are oriented and trained in techniques to help Individuals to detect and remediate potential problems. Specific regulations monitored regularly by State Licensing Agencies also serve to prevent abuse/neglect.

In addition to the above mentioned general provision for minimization of risk, additional steps have been taken to minimize potential risks of abuse related to an annual assessment of the population, physical plant, and environment of the facility. The following assessments, potential risks, and steps to minimize risk are incorporated into the current program abuse prevention plan.

Risk Assessment

POPULATION: NWMHC Northwestern Substance Use Disorder Services, located in rural Crookston, MN, serves as a referral source for several counties within Northwestern Minnesota.

Age: 0-100

Assessment: NWMHC Northwestern Substance Use Disorder Services serves individuals ages 10 and above who are assessed and diagnosed with substance use disorders and/or co-occurring disorders.

Potential Risk: Adult Individuals could share common space with Adolescent Individuals at the same time.

Steps to Minimize Risk: Individuals from ages 10 to 17 and those that are 18 years of age and still in school, are assigned to an adolescent program which is scheduled so that contact with adult Individuals is minimized. All other adolescent Individuals are assessed for potential vulnerabilities in an adult setting and are assigned to the adolescent program if significant vulnerabilities are

apparent. All Individuals are oriented to the rules and policies related to behavior and conduct upon acceptance into NWMHC Northwestern Substance Use Disorder Services. All Individuals are supervised by staff and the LADC'S or Mental Health Professional (MHP) while receiving services. Staff is educated upon hiring and annually thereafter on the procedures and identification criteria used to screen for vulnerable adults and maltreatment of minors.

Gender/Sexual Orientation:

Assessment: NWMHC Northwestern Substance Use Disorder Services offers services to female, male and gender non-conforming. Additionally, Individuals of varying sexual orientations are likely to be served by the program.

Potential Risk: Individuals could be discriminated against on the basis of gender or sexual orientation, and may also be vulnerable to verbal or physical abuse based on their gender or sexual orientation.

Steps to Minimize Risk: Orientation to the rules and policies related to behavior and conduct are reviewed with individuals upon receiving services. Supervision by staff and the LADC/MHP is provided while individuals receive services. Individual's behavior toward the opposite sex is monitored by staff and education is offered in regard to relationships throughout the program. Individuals are required to get staff approval to leave the group room unattended. Individuals are educated on personal care, money management, life skills and relationship issues. Educational components of the program are documented in the Individual record.

Culture/Ethnicity:

Assessment: The population of the area served by NWMHC is predominantly of White European/American descent, there are specific areas with Latino population of around 20%, and areas of Native American population of around 80%. Additionally, a significant number of clients served are at or below the federal income guidelines for poverty.

Potential Risk: Non-white cultures/ethnicities may not be fully addressed or given consideration in the treatment process. Individuals of minority cultural or ethnic backgrounds may be vulnerable to physical or verbal abuse from Individuals of other cultures. Individuals coming from a poverty level of income may have limited access to treatment services and are at potential risk of abuse based on a variety of factors related to financial limitations.

Steps to Minimize Risk: The LADC is required for licensure to document having received a minimum of 18 hours of continuing education in cultural diversity within their first four years of licensure and a minimum of 6 hours every two years thereafter per MN Statute 148C subd 3. NWMHC Northwestern Substance Use Disorder Services policies and procedures require that treatment be provided in a culturally competent manner. Individuals are oriented to the rules and policies related to behavior and conduct upon acceptance into the program. Individuals with financial difficulties are provided the same services as any other Individual and are encouraged to complete a Rule 25 assessment in order to gain financial assistance in covering the costs of treatment. For those that do not qualify, NWMHC Northwestern Substance Use

Disorder Services offers a payment plan based on the level of care recommended on the Rule 25 assessment criteria for each Individual's individual needs.

Mental Functioning:

Assessment: Individuals of NWMHC Northwestern Substance Use Disorder Services will vary in mental functioning. Individuals with moderate to severe mental retardation will not be admitted into the program; however, it is recognized that substance abuse and/or dependence can impact mental functioning to a greater extent for some Individuals than for others.

Potential Risk: Individuals admitted to the program could vary in functional capacity dependent on chemical use and those of lower mental functioning could be at risk of abuse by those at higher functioning levels and by program staff.

Steps to Minimize Risk: Individuals will be continually assessed for obvious signs of a decline in mental functioning and referred for additional assessment if necessary. Program staffs are trained to tailor service provision to Individual needs, including adapting treatment materials to a variety of functional levels. Policies and procedures related to Individual funds and property management, as well as program rules designed to minimize potential for financial exploitation or verbal or physical abuse have been developed.

Environment (Physical/Emotional/Behavioral Health):

Assessment: NWMHC is a Rule 29 licensed mental health center as well as a 245G licensed substance use disorder program, as such at any given time there are likely to be multiple Individuals with varying physical, emotional, and behavioral health needs are seen within the facility. As the agency offers comprehensive mental health services, some clients may be experiencing mental health situations ranging from very mild (i.e. exhibiting no outward symptomology) up to a crisis level mental health situation. Additionally many of our clients meet the definition of SMI/SPMI. Some physical health issues are more prevalent in the population we serve. These issues include diabetes, cardiovascular health, lung disease, and obesity. Most of our clients behaviors when controlled are safe for a shared clinical setting. Periodically there are situations in which clients may demonstrate agitated behavior or in which the behavior may escalate into potentially violent situation.

Potential Risk: Individuals with physical, emotional, and behavioral health needs can present a variety of challenges, including at times becoming a danger to themselves or others. Further, physical or emotional health related issues can increase vulnerability to abuse in a variety of ways, including decreased ability to ambulate quickly, disorientation or impaired judgment or decision-making capabilities, increased dependence on others for meeting basic needs, reliance on a variety of medications for continued stability, etc.

There is potential risk to clients if the behavior of a client escalates into a violent situation.

Steps to Minimize Risk: Substance Use Disorder staff members are required to be trained in mental health issues and the potential for vulnerability that these issues present. Programming

addresses the unique needs of Individuals with co-occurring mental health and substance use disorders. During the hours of operation of the mental health clinic additional staff members are on duty, including reception staff that monitors the waiting area and potentially inappropriate interactions between Individuals served by either program. Psychological and psychiatric consultation services are available for assistance with treatment planning and consultation as a means of reducing risks specific to Individuals with identified needs. In addition, services can be held in a part of the building that has access to its own restrooms, water fountain and exits that can minimize the risk of individuals mixing with other services located in the building.

Our mobile crisis response team is contacted should an individual need immediate mental health crisis services, on-staff mental health professionals are brought in to assist until the mobile crisis staff arrives. The agency always has staff in the building who are trained in de-escalation techniques, and staff are trained in how to obtain needed law enforcement/emergency services support should the situation warrant.

Need for Specialized Care and/or Staff Training to Meet Individual Needs:

Specialized Programs of Care: The agency currently does not provide specialized programs of care. However, in order to provide client centered care and meet individual needs, we will make modifications in our programming whenever possible to meet any unique needs of individual clients.

Assessment: As service provision is individualized based on the individual Recovery (treatment) Plan, the areas identified above in addition to others that may arise can lend themselves to enhanced staff, student, volunteer training and education.

Potential Risk: Given the population served, if ongoing assessment is neglected Individuals could quickly decompensate and require additional services or supports not necessary or provided at the time of service initiation. Individuals of lower overall levels of functioning could become targets for higher functioning and/or opportunistic Individuals. As Individuals served have a history of chemical abuse there is an increased potential for drug-seeking behavior, which could result in harm to self or others – NWMHC does provide psychiatric care, including medication management services within the agency.

Steps to Minimize Risk: Policies and procedures require ongoing assessment and continual revision of treatment planning based on need. Multidisciplinary staff members are available for consultation and a variety of referral resources are available for Individuals who cannot be adequately or safely served within this facility. Staff members are encouraged to develop competencies in a variety of areas relative to Individual need. All staff members receive training on Individual needs during their orientation and training and on an ongoing basis. Training related to potential behavior patterns and risks associated with caring for substance use abusing and/or dependent Individuals are addressed in this training. Additionally, staff receives training on all policies and procedures within the program, with particular attention paid to the policies

related to Individual safety and services and chart management including but limited to vulnerable adult and maltreatment of minors.

Staff Training to meet Individual Needs: Staff receive a variety of training regarding the provision of client-centered care. Our electronic learning management system (Relias), accessible to all staff, contains many training modules that staff can access to support their care to clients. (Do we need an example: "For example, Substance Use Disorder staff working with an individual who is dually diagnosed with a mental health disorder may access training to learn more about that specific mental health diagnosis.) Lastly, the agency has staff development procedures which allow staff to request additional training they feel is needed and/or which allows supervisors to assign staff to additional training as needed.

Knowledge Regarding Previous Abuse:

Assessment: Individuals served by the program may have a history of abuse or neglect which may or may not be known to program staff at the time of admission or throughout the duration of treatment. Substantiated reports of maltreatment of vulnerable adults within the facility are important in assessing potential risk factors that require inclusion within the Program Abuse Prevention Plan. To date, there have been 0 substantiated cases of abuse or neglect of a vulnerable adult within this agency.

Potential Risk: Individuals with a history of abuse or neglect may be more vulnerable to future abuse or neglect. Additionally, such individuals may place themselves in risky situations or may have developed trauma related symptoms that must be taken into consideration during the treatment process. There are no additional potential risks noted on the basis of substantiated risk factors.

Steps to Minimize Risk: Information regarding previous abuse is gathered during the comprehensive assessment all Individuals complete at intake. Any information gathered, whether during the initial assessment or at a later date is used to further assess risk and to determine whether additional needs are necessary. Individuals with abuse histories are screened carefully for mental health related needs and consultation is obtained regarding the need for further assessment or additional steps necessary to minimize risk, which are addressed in the individual treatment plan. The facility will continue to incorporate a review of cases of substantiated maltreatment of a vulnerable adult into the yearly assessment and review of the Program Abuse Prevention Plan, updating as necessary.

Physical Plant (Condition and Design of the Building):

Assessment: The NWMHC Northwestern Substance Use Disorder Services is located at 603 Bruce Street in Crookston, MN. The building itself was built in 1992 with an addition built in 2003. The facility has a main floor on which individual clinician offices are located. The building

also has a partial basement which houses 6 administrative offices, one office used for Parent-Child Interactive Therapy and one office used by community based staff primarily for administrative work but which is occasionally used to meet with clients. The facility has an elevator between the main floor and the basement as well as two staircases. The basement has one meeting room which can be used for group. There is an additional basement room under the main part of the building that houses utilities and IT equipment. The access door to this basement is locked at all times and limited staff have the key. There are sprinkler systems and emergency lighting throughout the building. Exit doors are clearly marked with lighted signs and exit doors have panic bars. The building is well-maintained and monitored regularly by a Facilities Manager.

The building is handicap accessible from the front and back entrance of the building. The building is adequately heated and air conditioned. Controlled air conditioning provides a comfortable treatment environment. In the event that the environment is compromised, repairs start immediately. Electric fans or heaters may be used or the treatment schedule may be revised in these situations.

The 603 Bruce Street building is a shared service building. It is 14,781 square feet of office and conference room space. NWMHC Northwestern Substance Use Disorder Services will be utilizing a variety of conference room and office spaces within building. For individual therapy sessions, staff will provide services in their office which is set up with a desk, computer and comfortable chairs to be used during treatment. Group Sessions will be held in one of the various conference rooms that can occupy between 8-20 people.

The other services provided out of this same building are Outpatient Children and Family CTSS, Outpatient Psychotherapy for Adults and Children, Psychiatry and Medication Management, Community Support Program and ARMHS services for Adults along with Homeless, Employment and the full Financial and Administration Support Services including the Chief Executive Officer. It is the site for board and management meetings as well as for trainings.

Emergency exits and maps are posted throughout the facility as well as fire alarms. The NWMHC has a broad spectrum Emergency Preparedness and Response Plan that address what to do in a variety of situations specifically for this location. There are 7 fire extinguishers as well as a sprinkler system in the majority of the building. All staff are trained in evacuation procedures, which are posted at the building. There are no areas that will be difficult to supervise in the area that will be utilized by individuals receiving services. Individuals are only able to enter the building from the front main entrance and may exit from any exterior door.

Staff at NWMHC Northwestern Substance Use Disorder Services is available throughout the building. Individuals leave and return from breaks together. Staff follows up if an Individual fails to return. Emergency phone numbers are posted at the facility.

Potential Risk: The NWMHC is located at the edge of Crookston in a relatively remote area that contains only one residence to the East of the building, one business to the back (South) of the

building and the Sheriff's Department to the West in the immediate neighborhood of the building. The entrance to the south business is located in a manner that does not allow visual access to the NWMHC. There is consequently very limited chance of problems with confidentiality or of abuse by individuals not affiliated with NWMHC. However, one side of the building faces a wooded area across the street. As there are residential and businesses and consumers for these businesses in the neighborhood that are outside NWMHC Northwestern Substance Use Disorder Services control, there are potential risks related to limitations placed on confidentiality as well as the risks of abuse by individuals not affiliated with NWMHC Substance Use Disorder Services. Additionally, the design of the building, and particular the length, provides some areas of the building which are much farther from the general reception area, creating more limited opportunity for direct supervision.

Steps to Minimize Risk: Individuals are oriented to the design of the building, including the additional residents and businesses located around the premises. Entrance to building is completely separate, which minimizes the risks of interactions between consumers and other populations. Employees of the other businesses and residents are aware of the nature of services provided by NWMHC Northwestern Substance Use Disorder Services and are asked to alert NWMHC Northwestern Substance Use Disorder Services staff or the authorities immediately if they observe any suspicious activity in or around the facility. However, the general remote location of the building minimizes the risk of interactions between consumers and other populations.

Areas in the Building which are Difficult to Supervise:

Assessment: The layout of the building provides for a few areas which is difficult to supervise. There is a stairwell in the adjacent lunch room and another stairwell on the South East end of the building. Any of the group rooms in themselves can be somewhat difficult when the door is closed and there are several offices that are also difficult to supervise when closed. Supervision of the parking area is easily provided, however for the far South West corner that is not visible from the reception. Direct supervision in the restrooms may be difficult if female staff with male individuals receiving services.

Potential Risk: With a few areas within & outside of the building having no direct line of sight for supervision capacity there is an increased risk of potential abuse.

Steps to Minimize Risk: During orientation Individuals are provided a tour of the facility and informed of areas which areas are accessible without staff and those with staff present. These areas include going beyond the reception area and the front restrooms or from the group rooms to the restrooms in the south group room or the South East stairwell from the basement group room. As well as being outside beyond the smoking area without other peers or staff. Individuals are also informed if they are arriving for group therapy they are to either sit in the waiting area or in the group room after being escorted to the room. If they are arriving for individual therapy they are to check in at reception or sit in the waiting/reception area. Staffs are trained to check in all Individuals and to verify appointments for those who sit without

checking in. All staff is trained to politely ask questions of any unidentified or unaccompanied individuals within the facility regarding purpose of their visit. During late afternoons the outside door to enter building will be locked and anyone entering facility will have to ring the bell to ensure Staff that anyone entering the building at that time is supposed to be there also Individuals are only allowed to leave group room for bathroom breaks one at a time during that time.

Community Location:

Assessment: NWMHC Northwestern Substance Use Disorder Services is located at 603 Bruce St Crookston MN. Crookston's current population is around 8,000 people.

Potential Risk: Individuals receiving services are generally residents of the county and/or city and surrounding areas and confidentiality may be compromised.

Steps to Minimize Risk: Individuals are informed of their rights upon intake and also sign a confidentiality statement that makes them aware of their rights as well as their fellow Individuals. Staff is oriented to HIPAA upon hiring and receives an annual update on training related to the confidentiality of Individual records and information.

Grounds and Terrain Surrounding the Building:

Assessment: The facility is located on the corner of Bruce St. and College Ave. This is an area at the edge of the community on streets with very little traffic. There is one private residence adjacent to the building. The building is across the street from the Polk County Sheriff's Office and the Juvenile Detention Center. The main parking lot is immediately in front of the building, and a smaller lot with full handicapped access immediately next to the building on the south side.

Potential Risk: The location of the parking lot could pose a potential risk. In particular, for handicap Individuals & or the elderly in the winter time.

Steps to Minimize Risk: When clients are oriented to the program, they will be informed that the building is handicap accessible from the north side with assistance in opening the door from staff or the south side entrance with a handicapped accessible door. During treatment breaks individuals have access to a smoking area outside the south door which has windows for observation and supervision from the South group room. This location will be used for groups taking place in the South or Basement group rooms. For groups in the East group room, breaks for smoking will be taken in the front parking lot in the designated area. Clients will be informed about parking availability. Snow removal from sidewalks and parking lots is done daily as needed. Bus and taxi service is available and individuals are dropped off at the front entrance.

Internal Programming:

Assessment: NWMHC is a Rule 29 Licensed Mental Health Center as well as a 245g Licensed Substance Use Disorder program. Internal programming at the facility includes individual, family and group outpatient mental health therapy; individual mental health assessment and testing;

and medication management. At times, community based workers who provide rehabilitative mental health services, targeted case management, therapeutic services and supports and peer services may see clients in the facility although generally these services are provided in client's homes or other community based settings.

Potential Risk: Given the wide range of programming provided within the facility, there are individuals of varying levels of vulnerability on the premises at any given point during the hours of operation.

Steps to Minimize Risk: All Individuals of NWMHC Northwestern Substance Use Disorder Services enter the building through a central front entrance through the reception area. During office hours, the reception area is monitored by staff. Staff from the various programs consults on a regular basis during staff meetings and all staff members are informed if an individual is deemed to be at a high risk of vulnerability to abuse.

Staffing:

Assessment: Need for qualified & staff training to meet identified individual needs of the Individuals.

Potential Risks: Having staff, students and/or volunteers practicing outside the scope of their practice. Individuals receiving services may present with complex issues and staff may extend their practice outside the scope of current knowledge and expertise. Being a rural and frontier region of the state, access to qualified personnel may be challenging to meet the needs of the individuals requesting and eligible for services.

Steps to Minimize Risks: Staff, students and/or volunteers hired to provide care for Individuals of NWMHC Northwestern Substance Use Disorder Services are screened & interviewed by trained staff to ensure proper qualifications, reliable references & adequate training are present. Background checks are completed on all staff members. Ongoing education & employment orientation are designed to enhance the skills & knowledge necessary to provide quality of care, safety and to disseminate to staff the policies dealing with vulnerable adults. All employees receive annual performance appraisals. All staff delivering direct services is directed by supervisors who are skilled in Individual assessment. To also help minimize abuse staff & Individuals are oriented to Program Abuse Prevention Plan, Individual Abuse Prevention Plan, Grievance Policy, Maltreatment to Minors & Vulnerable Adult Policies, it is also encouraged the reporting of abuse & ensuring the protection for those reporting. Clinical staff is further governed by their respective code of ethics, & NWMHC Northwestern Substance Use Disorder Services Code of Ethics. Also to help reduce risks of abuse Development, ongoing assessment, & continual updating & revision of Individualize Treatment Plans to guide & direct clinical management of Individuals care & individualize needs. On-going recruitment and retention strategies in line with the agencies strategic plan shall be implemented to obtain and maintain high quality employees.

Staffing Patterns:

Assessment: NWMHC Northwestern Substance Use Disorder Services staff includes Program Manager, LADC'S and MHP's, Peer Recovery Specialists and other employees of the NWMHC as needed to meet the individuals Recovery (treatment) Plan goals and outcomes. Additionally, the NWMHC Northwestern Substance Use Disorder Services is supported by office personnel. The LADC is present at all times that treatment services are provided to Individuals within the program. In addition, there are additional Licensed and Unlicensed staff members available at the facility between the hours of 8am and 5:00 pm. The actual number of staff on site varies from only 1 other staff member, to up to 60 staff members dependent on the day and time in question.

Potential Risk: Due to the limited number of staff available there are times when the LADC is the only staff member present in the building during evening group hours. Additionally, as the LADC is the only licensed substance use disorder counselor currently employed with the agency, this individual is often facilitating groups averaging 8, but with the potential for 16, individuals. A potential 16:1 staff ratio increases the risks of abuse due to the limited ability to provide constant supervision. With the current staffing pattern, the likelihood that an individual will be left unattended at some point during the hours of operation is high.

Steps to Minimize Risk: During the evening group hours, Individuals are restricted in their access to the building. Access is limited to the group room, the restrooms, the front entrance area and the outside smoking area. Should the Individual need to access another area of the building, the Individual is required to seek permission from the staff and/or be escorted. The staff has scheduled break times for the Individuals, and during group, only one person at a time is allowed to leave to use the restroom. These specific measures minimize the risk of abuse.

***** Within 24 hours of admission,** the Individual shall receive orientation to the Program Abuse Prevention Plan. The Program Abuse Prevention Plan will remain posted in reception area. NWMHC Northwestern Substance Use Disorder Services Abuse Prevention Plan shall be reviewed at least annually. Any changes will be reported to the Individuals and the most recent copy shall remain posted, with the date update indicated in the footer of each page. * * *

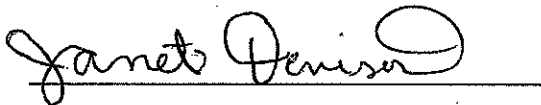
INDIVIDUAL ABUSE PREVENTION PLANS

In addition to the Program Abuse Prevention Plan, Individual Abuse Prevention Plans will be formulated as necessary for any Individual who is assessed and determined to be a vulnerable adult while in treatment at the facility. This plan will be developed by the interdisciplinary team according to the Individual Abuse Prevention Policy.

Attestation Statement:

As the governing body of Northwestern Mental Health Center; Northwestern Substance Use Disorder Services, has authorized the Executive Director to implement needed procedures along with the Agencies Licensed Alcohol and Drug Counselor, declare that we have reviewed and updated the Program Abuse Prevention Plan according to the assessment factors described in the plan and any substantiated charges that occurred since last review. We hereby approve the updates made in the Program Abuse Prevention Plan on this 24th day of August, 2018

Signed:



Janet Denison, LICSW/LADC, Chief Clinical Officer



Shauna Reitmeier, MSW, Executive Director