

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  15G211	X2) MULTIPLE CONSTRUCTION A. BUILDING 00 B. WING _____	X3) DATE SURVEY COMPLETED  05/29/2014
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NAME OF PROVIDER OR SUPPLIER  VOCA CORPORATION OF INDIANA	STREET ADDRESS, CITY, STATE, ZIP CODE 810 CARLYLE ST COLUMBIA CITY, IN 46725
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W000000	<p>This visit was for a fundamental annual recertification and state licensure survey.</p> <p>Dates of Survey: May 20, 21, 22, 27, 28 and 29, 2014.</p> <p>Provider Number: 15G211 Facility Number: 000737 AIM Number: 100243270</p> <p>Surveyor: Susan Reichert, QIDP</p> <p>The following deficiencies also reflect state findings in accordance with 460 IAC 9. Quality Review completed 6/4/14 by Ruth Shackelford, QIDP.</p>	W000000		
W000104	<p>483.410(a)(1) GOVERNING BODY The governing body must exercise general policy, budget, and operating direction over the facility.</p> <p>Based on record review and interview for 4 of 4 sampled clients (#1, #2, #3 and #4) and for 3 additional clients (#5, #6 and #7), the governing body failed to exercise general</p>	W000104	The governing body will exercise general policy, budget, and operating direction over the facility. All maintenance issues will be completed by June 28, 2014. The Residential Manager will complete the home	06/28/2014

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE

TITLE

(X6) DATE

Any deficiency statement ending with an asterisk (\*) denotes a deficiency which the institution may be excused from correcting providing it is determined that other safeguards provide sufficient protection to the patients. (see instructions.) Except for nursing homes, the findings stated above are disclosable 90 days following the date of survey whether or not a plan of correction is provided. For nursing homes, the above findings and plans of correction are disclosable 14 days following the date these documents are made available to the facility. If deficiencies are cited, an approved plan of correction is requisite to continued program participation.

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	<p>policy and operating direction over the facility to ensure the home was maintained in good condition.</p> <p>Findings include:</p> <p>Observations were completed at the group home where clients #1, #2, #3, #4, #5, #6 and #7 resided on 5/20/14 from 4:30 PM until 6:05 PM. There was a patched and unpainted spot on the living room wall 2 feet by 6 inches in the living room. Client #7's room had patched and unpainted areas 2 feet by 2 inches and 6 inches by 1 inch in one corner of the room. There were 2 feet by 2 inches and 6 inch by 1 inch gouges on the laminate wood flooring exposing the underlayment on client #7's floor. Client #7's room had one bed and one night stand in the room. There was no dresser in client #7's room.</p> <p>The house manager was interviewed on 5/20/14 at 4:48 PM and indicated the flooring was planned to be replaced.</p> <p>During observations at the group home on 5/21/14 from 6:22 AM until 8:30 AM, there were 3 marks on the kitchen flooring that were dark in color. Client #7's clothing was hanging in the closet and folded in the night stand.</p> <p>The house manager was interviewed on 5/21/14 at 7:20 AM and indicated the flooring had been in need of repair for a period of time (unspecified) and the facility</p>		<p>environment checklist on a monthly basis. Client #7's dresser will be replaced. The QIDP will complete weekly active habilitation forms to include environmental checklist. The Clinical Supervisor and/or Program Manager will complete quarterly environmental checks.</p>	

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	<p>was obtaining estimates to replace the flooring in the kitchen and client #7's bedroom. She indicated client #7's dresser was not planned to be replaced and stated, "He likes to destroy them."</p> <p>The QIDP (Qualified Intellectual Disabilities Professional) was interviewed on 5/28/14 at 11:40 AM and indicated client #7 had a plan to address property destruction, but did not intentionally destroy his nightstand. She indicated client #7 liked to put miniature replica's of cars and trucks into the drawers and open and close them repeatedly, and the drawers would wear out as a result.</p> <p>A document dated 5/19/14 was reviewed on 5/28/14 at 1:45 PM and indicated "the following to need repair and or attention: Kitchen floor is scarred and needs to be replaced--looks like black scuff marks but when I touched them they were deeper than scuff marks...[client #7] room-2 walls repaired and not painted, flooring close to the window needs repaired, wall next to bed needs repainted...Living room wall has been repaired--not painted, hallway repaired not painted by med (medication) room...We will need to get approval for the flooring to be done...."</p> <p>9-3-1(a)</p>			

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W000149	<p>483.420(d)(1) STAFF TREATMENT OF CLIENTS The facility must develop and implement written policies and procedures that prohibit mistreatment, neglect or abuse of the client. Based upon observation, record review and interview for 1 of 4 sampled clients (client #3), the facility neglected to develop and implement policy and procedures to protect him from self injurious behavior of biting and hitting his head causing injuries requiring medical care and first aid.</p> <p>Findings include:</p> <p>The facility's internal incident reports, reports to the Bureau of Developmental Disabilities Services (BDDS) from 2/20/14 to 5/20/14 and investigations of allegations of abuse/neglect/exploitation from 5/20/13 were reviewed on 5/20/14 at 2:31 PM and indicated the following:</p> <p>A BDDS report dated 1/2/14 indicated client #3 was "agitated" and hit himself "2-3 times" at day services before staff could retrieve a pillow used to prevent injury. The report indicated staff had followed client #3's plan to address client</p>	W000149	<p>The facility will ensure that the development of written policies and procedures that prohibit the mistreatment, neglect or abuse with all clients is implemented. Client #3's behavior support plan will be reviewed and revised to include recommendations from the behavioral assessment tool. The Behavior Clinician will train staff on proactive strategies and alternate activities for client #3. A speech/language evaluation has been scheduled for client #3. The QIDP will revise existing communication objective, based on recommendations from the speech/language evaluation, to better meet client #3's needs. Once revised, staff will be trained on implementing client #3's communication needs. The workshop staff will be trained on proactive strategies and alternate activities for client #3 as well as implementing communication needs. The QIDP and RM will complete day program observations two times a week to ensure client #3's plan is being implemented. In addition, a member of the operations team will</p>	06/28/2014

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	<p>#3's behavior by blocking, redirecting and arranging the environment. Plan to resolve included purchasing more pillows to "lessen the amount of time it takes to have it for use when [client #3] gets upset."</p> <p>An incident report dated 2/2/14 indicated client #3 "became agitated" while watching TV and hit himself in the head several times causing redness to his head. The report indicated the nurse was notified and client #3 was monitored by completing neurological checks. Plan of improvement/prevention/resolution indicated "staff will continue to follow [client #3's] BSP (behavior support plan) for SIB (self injurious behavior). Redirect to alternate activity."</p> <p>An incident report dated 2/18/14 indicated client #3 went to his room and began "screaming. Staff checked on him and he was hitting himself in the face and head. When [client #3] calmed down staff did neuros (neurological checks) and gave him Tylenol 325 mg (milligrams) and triple antibiotic to both arms." The report indicated client #3 had a small scratch on top of his head, scratches on left and right arms, bite marks to both arms and bruises to his arms (size and specific location not indicated). Plan of improvement/prevention/resolution</p>		complete weekly day program observations until the location has demonstrated compliance.		

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	<p>indicated "Staff will continue to follow BSP for SIB. They will continue to treat for headache if one is suspected."</p> <p>An incident dated 2/22/14 indicated client #3 "became agitated while watching TV" and hit himself in the head "multiple times." The report indicated client had a red mark on his forehead (1 inch in diameter) with "slight" swelling on the right side of the forehead. Plan of improvement/prevention/resolution indicated "Staff will continue to follow BSP for SIB, and will attempt to redirect or engage [client #3] in positive replacement behaviors."</p> <p>An incident report dated 3/23/14 indicated client #3 was in his bedroom engaged in self stimulation and "got mad and yelled, then bit himself on the wrist and hit himself in the head. Staff tried to block and [client #3] tried to bite staff." The report indicated client #3 sustained a 1 and 1/2 inch in diameter bite mark on right forearm. "Very red at this time." Plan of improvement/prevention/resolution indicated "staff will continue to follow [client #3's] BSP for SIB. Self stimulation is usually a calming time for him."</p> <p>An incident report dated 3/30/14</p>			

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	<p>indicated client #3 had become "agitated" when staff left. Client #3 was directed to activity but "didn't want to participate" and client #3 "began to hit himself in the head and bite his forearms." The report indicated staff had attempted to block his self injurious behavior. Plan of improvement/prevention/resolution indicated "continue to follow [client #3's] BSP for SIB. Staff will attempt to engage [client #3] in alternate activities when peers are leaving."</p> <p>An incident report dated 4/28/14 indicated client #3 was "upset" when he was unable to find a shirt to wear and and hit himself in the head and face. Staff attempted to block his self injurious behavior, but client #3 went to his room and hit himself two more times in the head. Client #3 sustained red marks and a 1 inch knot in the middle of his forehead. Plan of improvement/prevention/resolution indicated "staff will continue to work with [client #3] to find his clothing. Staff will attempt to preset his clothing the night before (working with client #3 to make choices)."</p> <p>A BDDS report dated 5/15/14 indicated at 6:30 AM while at the group home, client #3 had bitten his finger and went to the emergency room for evaluation and</p>			

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	<p>treatment. Client #3 was given first aid at the hospital for a bite to his finger and released. Plan to resolve indicated self injurious behavior was in client #3's plan and it was being followed.</p> <p>An IDT (Interdisciplinary Team) meeting dated 5/16/14 for the incident on 5/15/14 was reviewed on 5/28/14 at 1:45 PM and indicated the following:</p> <p><b>"ANTECEDENT TO BEHAVIOR:</b> [Client #3] had just finished shaving with staff assistance, and was in the living room. He was quiet at that time and was not agitated.</p> <p><b>BEHAVIOR:</b> [Client #3] became self-abusive and bit the middle finger of his left hand around the first knuckle .</p> <p><b>CONSEQUENCES OF BEHAVIOR:</b> A washcloth was applied to the wound and the nurse was contacted. [Client #3] was taken to the emergency room of Hospital, treated and released.</p> <p><b>HOW COULD THIS HAVE BEEN PREVENTED?</b> Staff should attempt to move [client #3] from one activity to the next by using his picture cards or verbally engaging [client #3] in another activity.</p> <p><b>REVIEW OF BSP:</b> The BSP was</p>			

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	<p>reviewed today. No changes were made.</p> <p><b>IDT MEMBERS PRESENT AND DATE OF REVIEW:</b> [RM] (Residential Manager); [DCP-MC] (Direct Care Professional-Medical Coach); [QIDP]; [LPN] - 5/16/14.</p> <p><b>RECOMMENDATIONS FROM THE REVIEW:</b> 1) Review with staff the use of communication cards with [client #3]. 2) Review BSP with staff, focusing on the proactive strategies that are in place. 3) Review BSP and the interventions to be used for self-injurious behaviors. 4) Inform psychiatrist of latest incident during medication review on 8/27/14.</p> <p><b>RESPONSIBLE PERSON(S) FOR IMPLEMENTING/TRAINING FOR THE RECOMMENDATIONS:</b> [QIDP]; [RM]; all staff in the home.</p> <p><b>TARGET DATE FOR IMPLEMENTATION AND TRAINING FOR RECOMMENDATIONS:</b> Staff in-service - 5/23/14."</p> <p>During observations at the group home on 5/20/14 from 4:30 PM until 6:05 PM, client #3 sat on the sofa and hummed at a high volume with his hands covering his ears except when he ate his meal. Client</p>			
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	<p>#3 was prompted once to engage in a coloring activity, but did not respond. Client #3 was not offered alternative choices of activities or the use of pictures during the observation when he transitioned from pre-meal to meal to post meal activities. Client #3 was not offered other activity during the observation.</p> <p>During observation at the group home on 5/21/14 from 6:22 AM until 8:30 AM, client #3 sat humming at a high volume with his hands covering his ears at 7:25 AM except when he ate his meal. Client #3 was not offered alternative choices of activities or the use of pictures during the observation when he transitioned from eating his meal to preparing for work. Client #3 was not offered other activity during the observation.</p> <p>During observation at the day services on 5/21/14 from 9:48 AM until 10:32 AM, client #3 was not prompted to use pictures as a communication system. Client #3 sat in a room and was prompted to wait for a movie by workshop staff #1 as he sat on a chair with his hands over his ears. Client #3 was offered a ball activity, but did not respond.</p> <p>The Community Supports Coordinator was interviewed on 5/21/14 at 10:00 AM.</p>			

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	<p>She indicated client #3 was in the same area of the day services all day and stated, "He doesn't like moving around." She indicated he liked Disney movies and will calm when the movie begins. She indicated client #3 did not use a communication system as he refused to use it and the day services had discontinued his objective regarding the use of pictures as a communication strategy.</p> <p>Workshop staff #1 was interviewed on 5/21/14 at 10:01 AM and indicated client #3 refused all activities except movies and listening to music. She stated client #3 was "much more calm now than he was this morning. He was very agitated this morning and yesterday."</p> <p>Client #3's records were reviewed on 5/21/14 at 2:55 PM. An ISP dated 3/13/14 indicated objectives to choose between pictures of activities and to identify coins. A Behavior Support Plan dated 3/13/14 indicated:</p> <p><b>"GOAL:</b> To increase appropriate social interactions by decreasing episodes of inappropriate social behaviors defined as self-injurious behavior (SIB), noncompliance, physical aggression and public masturbation.</p>						

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	<p><b>INTERMEDIATE OBJECTIVE:</b> [Client #3] will exhibit no more than 66 episodes of inappropriate social behavior per month across 6 consecutive months by 9/30/14.</p> <p><b>OBJECTIVE:</b> [Client #3] will exhibit no more than 50 episodes of inappropriate social behavior per month across 6 consecutive months by 3/31/15.</p> <p><b>DEFINITION OF BEHAVIOR</b> Signs/Symptoms of autism: failure to respond to name, avoiding eye contact with other people, repetitive movements such as rocking and twirling, self-abusive behavior such as biting or head-banging. Physical aggression: hitting, kicking, moving others out of the way, biting, scratching. SIB: pinching, picking, hitting and scratching self. Noncompliance: refusal to comply with ADL (adult daily living skills)'s, hygiene and simple tasks. Public masturbation: masturbation in the presence of others while not in his bedroom or bathroom.</p> <p><b>POSITIVE STRATEGIES</b></p> <p>Provide a calm, positive and relaxed environment. Be patient, consistent and repetitive. Prompt [client #3] that one activity is going to end and another is going to begin. This allows him time to</p>			
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	<p>process the transition.</p> <p>Offer structure to [client #3]' s daily routine.</p> <p>Be firm in your expectations of his involvement when introducing new activities/foods. Be clear and direct, <b>'This is what we are doing today.'</b></p> <p>Staff need to be knowledgeable of [client #3]'s triggers and attune themselves to signals of potential crisis behavior.</p> <p>Staff should attune themselves to [client #3] to help him communicate to them his wants/needs.</p> <p>Provide verbal praise often throughout the day as encouragement and to reinforce replacement behaviors...</p> <p>A Behavior Assessment Tool (BAT) dated 2/5/14 was reviewed on 5/28/14 at 2:45 PM and indicated the following:</p> <p>"[Client #3]'s behavioral issues began when he was very young and was diagnosed at the [Hospital]. He is limited in many areas such as verbal skills, safety skills, hygiene and ADLs...[Client #3] can complete simple tasks when given single step instructions. [Client #3] also displays extreme sensory issues and needs a sensory program or diet to help reduce his anxiety and boredom.</p> <p><b>Functional Assessment:</b> The Functional Assessment Screening</p>			

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	<p>Tool was completed to assess the most likely variables for functions of [Client #3]' s behaviors. The behaviors assessed were self-injurious behaviors, physical aggression, uncooperativeness, and public masturbation. The most likely variables are social and automatic reinforcement in the forms of attention, access to specific activities, escape (task avoidance), sensory stimulation and pain attenuation.</p> <p><b>Target Behaviors:</b></p> <p>Physical Aggression                      Hitting, kicking, moving others out of the way, etc.</p> <p>SIB    Pinching, picking, hitting and scratching of self</p> <p>Uncooperativeness                      Refusal to comply with ADLs, Hygiene and simple tasks</p> <p>Public Masturbation Masturbation in the presence of others.</p> <p><b>Replacement Behaviors:</b></p> <p>Activities/Exercise                      Completing simple tasks, walking, riding bike, etc.</p> <p>Communication                      Communicating</p> <p style="text-align: right;">thro ugh sign lang uag</p>			

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	<p>e, hear ing ver bal pro mpt s fro m staf f, etc.</p> <p>Compliance Completion of reasonable req uest s...</p> <p><b>Proactive Interventions:</b> [Client #3] will benefit from a calm, positive, and relaxed environment.</p> <p>The key to working with [client #3] is to have patience, be consistent, and repetitive.</p> <p>Providing prompts to [client #3] that one activity is going to end and another is going to begin allows him time to process the transition.</p> <p>Offer structure to [client #3]' s daily routine. If he knows what to expect on a daily basis he will be better able</p>			

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	<p>to deal with the daily expectations, i.e. shower, medication, meal time, community outings, day program, etc.</p> <p>When introducing new activities and/or foods to [client #3] be firm in your expectations of his involvement and be clear and direct, <b>'This is what we are doing today.'</b></p> <p>It is important that we remain consistent in our expectations of [client #3]. If [client #3] refuses to participate in an activity/ meal request, reintroduce the activity/ meal request at the next scheduled time. It often takes 60-90 times of presentation before he may become willing to engage/ try it independently.</p> <p>Staff members working with [client #3] at home need to understand his triggers and attune themselves to signals of potential crisis behavior. By being aware of such signals, [client #3]'s staff can help de-escalate the behaviors and protect themselves and [client #3].</p> <p>[Client #3]'s verbal communication skills are limited, and he currently communicates using gestures, and leading people to what he wants and/or needs. Staff should attune</p>			

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	<p>themselves to [client #3] to help him communicate to them his wants and/or needs.</p> <p>Provide [client #3] with verbal praise often throughout the day as encouragement and to reinforce replacement behaviors....</p> <p><b>Guidelines for Teaching Functional Replacement Behaviors</b> <i>The idea of replacement behaviors is that they be taught and used throughout the day and not just when the person is active in displaying target behaviors. They are to be incompatible with target behaviors, for example if a person is completing a relaxation technique he or she cannot be actively engaging in physical aggression.</i></p> <p><u>Teaching a New Activity:</u> One outlet for [client #3]'s agitation and boredom is completing an activity, i.e., games, puzzles, coloring, etc. Staff will continually introduce [client #3] to different activities with the intention of developing a routine of activities that he enjoys and will complete independently or with staff. This will give [client #3] one on one interaction with staff, which helps build his communication skills and social skills.</p>						

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	<ol style="list-style-type: none"> <li>1. Set [client #3] in front of the activity</li> <li>2. Show him the activity and allow him to complete it on his own</li> <li>3. If [client #3] does not respond then help him by using the 'hand over hand' technique to complete the activity until he is able to perform the activity on his own (hand over hand is completed by staff putting their hand on top of [client #3]'s hand to gently guide it to the activity to be completed, but do not force [client #3] to participate)</li> <li>4. State to [client #3] that he is working (sic) an activity and then praise him enthusiastically after his attempt or completion of the activity</li> <li>5. Repetition with [client #3] is good until he learns the desired activity well enough to complete it on his own...</li> </ol> <p><u>Communication Board/Picture Book:</u> Because [Client #3] is non-verbal, he participates in limited communication and has the capability to learn how to communicate PECS (picture exchange communication system) or some form of</p>			

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	<p>picture system...</p> <p>First-Then, Timers and Highlighted Schedule</p> <p>A daily schedule utilizing pictures to communicate daily activities has proven effective in alleviating anxiety for [client #3] by highlighting transitions in his daily activities. In addition, [client #3] appears to respond well to cues that indicate the next scheduled activity such as utilizing 'First-Then' cues such as, '[Client #3] reading first, then gym'. The use of a kitchen timer can also be effective with communicating a desired length of time to [client #3]. [Client #3] performs an activity until the timer rings. The more [client #3] understands, the less anxious he is when interacting with others, especially with those individuals he is not yet accustomed.</p> <p><b>ABA therapy</b></p> <p>ABA therapy is based on careful study (analysis) of each behavior; breaking down each behavior into even smaller behaviors (task analysis) and gradually teaching each small behavior one at a time, using rewards in very specific ways (shaping). While uniquely adapted to each child (individualized), this is a highly structured, rigorous, systematic and consistent (in all locations) teaching</p>			
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	<p>approach, which is organized around:</p> <ol style="list-style-type: none"> <li>The specific way a request is made of the child (Antecedents)</li> <li>The child's response to requests (Target Behaviors) and</li> <li>How adults react to the child's correct/incorrect responses (Consequences)</li> </ol> <p>Within [client #3]'s ABA program, a positive and systematic approach to teaching functional skills and reducing behavior problems will be emphasized. The keys to [client #3]'s success are of the utmost importance and can be achieved through creativity, flexibility, and capitalizing on resources available to [client #3]. In the initial phases of ABA therapy, it is important that all members of [client #3]'s team adhere consistently to the smallest details of his ABA therapy. As [client #3] masters skills, it becomes important to deliberately increase variability in order to facilitate generalization to all persons and settings in his natural environment.</p> <p>An example of the use of ABA: Taking [client #3] in to a community setting and getting him to engage in an activity Give [client #3] a small task to complete</p>			

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	<p>Provide a reinforcement immediately following the completion of the task</p> <p>Pair the reinforcement with verbal praise and/or high five</p> <p>Give [client #3] another small task to complete</p> <p>Continue with the task/reinforcement combination until he completes the entire task</p> <p>After several successful completions of the task, slowly remove the reinforcement</p> <p>Below are a list of suggestions for modifications and areas to be aware of when working with [client #3] and his sensory issues.</p> <p><b>Environmental Accommodations</b></p> <ul style="list-style-type: none"> <li>· Provide structure and predictability of schedule</li> <li>· Provide opportunities to be included with typically developing peers</li> <li>· Reduce level of noise, proximity of other peers</li> <li>· Use natural lighting whenever possible</li> <li>· Avoid crowded areas; help [client #3] gradually desensitize to large crowded environments</li> <li>· Encourage opportunities to move</li> <li>· Remove or minimize stressful events whenever possible</li> <li>· Provide support for transitions, i.e. transitional object, job or task</li> </ul>			

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	<p>to rove from one location to another...."</p> <p>The QIDP (Qualified Intellectual Disabilities Professional) was interviewed on 5/28/14 at 12:35 PM and indicated client #3's objectives and strategies of his behavior plan should have been implemented, and staff needed continuing training to ensure they continued to prompt client #3 to activity and the use of pictures for communication as proactive measures to address client #3's behavior. She indicated corrective action steps to address client #3's SIB included the use of a behavioral clinician to develop a plan to address client #3's behavior.</p> <p>The facility's Policy/Procedure for Reporting and Investigating Abuse/Neglect/Exploitation/Mistreatment of clients dated 6/2011 was reviewed on 5/20/14 at 6:30 PM and indicated "All allegations or occurrences of abuse/neglect/exploitation/mistreatment shall be reported to the appropriate authorities through the appropriate supervisory channels and will be thoroughly investigated under the policies of ResCare Northern Region Indiana, local, state and federal guidelines...Procedures: 1. Any ResCare</p>						

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	<p>staff person who suspects an individual is the victim of abuse/neglect/exploitation should immediately notify the Director of Supported Group Living (group homes), then complete an Incident Report. The Director of Supported Group Living/Supported Living will then notify the Executive Director. This step should be done within 24 hours. The Director of the program (SGL or SL) or designee will report the suspected abuse, neglect or exploitation within 24 hours of the initial report to the appropriate contacts, which may include:...Bureau of Developmental Disabilities Service Coordinator...The Director of the Program (SGL or SL) will assign an investigative team. A full investigation will be conducted by investigators who have received training from Labor Relations Association and ResCare's internal procedures or investigations...One of the investigators will complete a detailed investigative case summary based on witness statements and other evidence collected...An investigative peer review committee chosen by the Executive Director will meet to discuss the outcome of the investigation and to ensure that a thorough investigation has been completed. Members of the committee must include at least one of the investigators, the Executive Director or designee, Director of Supported Living or</p>			

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	<p>SGL, and a Human Resources representative." The policy did not indicate the requirement to develop and implement corrective action to address abuse and neglect.</p> <p>9-3-2(a)</p>			

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W000157	<p>483.420(d)(4) STAFF TREATMENT OF CLIENTS If the alleged violation is verified, appropriate corrective action must be taken. Based upon observation, record review and interview for 1 of 4 sampled clients (client #3), the facility failed to implement effective corrective action to ensure staff implemented client #3's plan to address his self injurious behavior of biting and hitting his head.</p> <p>Findings include:</p> <p>The facility's internal incident reports, reports to the Bureau of Developmental Disabilities Services (BDDS) from 2/20/14 to 5/20/14 and investigations of allegations of abuse/neglect/exploitation from 5/20/13 were reviewed on 5/20/14 at 2:31 PM and indicated the following:</p> <p>A BDDS report dated 1/2/14 indicated client #3 was "agitated" and hit himself "2-3 times" at day services before staff could retrieve a pillow used to prevent injury. The report indicated staff had followed client #3's plan to address client #3's behavior by blocking, redirecting and arranging the environment. Plan to resolve included purchasing more pillows to "lessen the amount of time it takes to have it for use when [client #3] gets upset."</p>	W000157	<p>The facility will ensure that if an alleged violation is verified, appropriate corrective action will be taken. Client #3's behavior support plan will be reviewed and revised to include recommendations from the behavioral assessment tool. The Behavior Clinician will train staff on proactive strategies and alternate activities for client #3. A speech/language evaluation has been scheduled for client #3. The QIDP will revise existing communication objective, based on recommendations from the speech/language evaluation, to better meet client #3's needs. Once revised, staff will be trained on implementing client #3's communication needs. The workshop staff will be trained on proactive strategies and alternate activities for client #3 as well as implementing communication needs. The QIDP and RM will complete weekly active habilitation forms to ensure client #3's plan is being implemented. The QIDP and RM will complete day program observations two times a week. In addition, a member of the operations team will complete weekly day program observations until the location has demonstrated compliance.</p>	06/28/2014
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	<p>An incident report dated 2/2/14 indicated client #3 "became agitated" while watching TV and hit himself in the head several times causing redness to his head. The report indicated the nurse was notified and client #3 was monitored by completing neurological checks. Plan of improvement/prevention/resolution indicated "staff will continue to follow [client #3's] BSP (behavior support plan) for SIB (self injurious behavior). Redirect to alternate activity."</p> <p>An incident report dated 2/18/14 indicated client #3 went to his room and began "screaming. Staff checked on him and he was hitting himself in the face and head. When [client #3] calmed down staff did neuros (neurological checks) and gave him Tylenol 325 mg (milligrams) and triple antibiotic to both arms." The report indicated client #3 had a small scratch on top of his head, scratches on left and right arms, bite marks to both arms and bruises to his arms (size and specific location not indicated). Plan of improvement/prevention/resolution indicated "Staff will continue to follow BSP for SIB. They will continue to treat for headache if one is suspected."</p> <p>An incident dated 2/22/14 indicated client #3 "became agitated while</p>			

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	<p>watching TV" and hit himself in the head "multiple times." The report indicated client had a red mark on his forehead (1 inch in diameter) with "slight" swelling on the right side of the forehead. Plan of improvement/prevention/resolution indicated "Staff will continue to follow BSP for SIB, and will attempt to redirect or engage [client #3] in positive replacement behaviors."</p> <p>An incident report dated 3/23/14 indicated client #3 was in his bedroom engaged in self stimulation and "got mad and yelled, then bit himself on the wrist and hit himself in the head. Staff tried to block and [client #3] tried to bite staff." The report indicated 1 and 1/2 inch in diameter bite mark on right forearm. "Very red at this time." Plan of improvement/prevention/resolution indicated "staff will continue to follow [client #3's] BSP for SIB. Self stimulation is usually a calming time for him."</p> <p>An incident report dated 3/30/14 indicated client #3 had become "agitated" when staff left. Client #3 was directed to activity but "didn't want to participate" and client #3 "began to hit himself in the head and bite his forearms." The report indicated staff had attempted to block his self injurious behavior. Plan of</p>			

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	<p>improvement/prevention/resolution indicated "continue to follow [client #3's] BSP for SIB. Staff will attempt to engage [client #3] in alternate activities when peers (sic) are leaving."</p> <p>An incident report dated 4/28/14 indicated client #3 was "upset" when he was unable to find a shirt to wear and and hit himself in the head and face. Staff attempted to block his self injurious behavior, but client #3 went to his room and hit himself two more times in the head. Client #3 sustained red marks and a 1 inch knot in the middle of his forehead. Plan of improvement/prevention/resolution indicated "staff will continue to work with [client #3's] to find his clothing. Staff will attempt to preset his clothing the night before (working with client #3 to make choices)."</p> <p>A BDDS report dated 5/15/14 indicated at 6:30 AM while at the group home, client #3 had bitten his finger and went to the emergency room for evaluation and treatment. Client #3 was given first aid at the hospital for a bite to his finger and released. Plan to resolve indicated self injurious behavior was in client #3's plan and it was being followed.</p> <p>An IDT (Interdisciplinary Team) meeting</p>						

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	<p>dated 5/16/14 for the incident on 5/15/14 was reviewed on 5/28/14 at 1:45 PM and indicated the following:</p> <p><b>"ANTECEDENT TO BEHAVIOR:</b> [Client #3] had just finished shaving with staff assistance, and was in the living room. He was quiet at that time and was not agitated.</p> <p><b>BEHAVIOR:</b> [Client #3] became self-abusive and bit the middle finger of his left hand around the first knuckle .</p> <p><b>CONSEQUENCES OF BEHAVIOR:</b> A washcloth was applied to the wound and the nurse was contacted. [Client #3] was taken to the emergency room of Hospital, treated and released.</p> <p><b>HOW COULD THIS HAVE BEEN PREVENTED?</b> Staff should attempt to move [client #3] from one activity to the next by using his picture cards or verbally engaging [client #3] in another activity.</p> <p><b>REVIEW OF BSP:</b> The BSP was reviewed today. No changes were made.</p> <p><b>IDT MEMBERS PRESENT AND DATE OF REVIEW:</b> [RM] (Residential Manager); [DCP-MC] (Direct Care Professional-Medical Coach); [QIDP]; [LPN] - 5/16/14.</p>			

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	<p><b>RECOMMENDATIONS FROM THE REVIEW:</b> 1) Review with staff the use of communication cards with [client #3]. 2) Review BSP with staff, focusing on the proactive strategies that are in place. 3) Review BSP and the interventions to be used for self-injurious behaviors. 4) Inform psychiatrist of latest incident during medication review on 8/27/14.</p> <p><b>RESPONSIBLE PERSON(S) FOR IMPLEMENTING/TRAINING FOR THE RECOMMENDATIONS:</b> [QIDP]; [RM]; all staff in the home.</p> <p><b>TARGET DATE FOR IMPLEMENTATION AND TRAINING FOR RECOMMENDATIONS:</b> Staff in-service - 5/23/14."</p> <p>During observations at the group home on 5/20/14 from 4:30 PM until 6:05 PM, client #3 sat on the sofa and hummed with his hands covering his ears except when he ate his meal. Client #3 was prompted once to engage in a coloring activity, but did not respond. Client #3 was not offered alternative choices of activities or the use of pictures during the observation when he transitioned from pre-meal to meal to post meal activities. Client #3 was not offered other activity</p>			
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	<p>during the observation.</p> <p>During observation at the group home on 5/21/14 from 6:22 AM until 8:30 AM, client #3 sat humming with his hands covering his ears at 7:25 AM except when he ate his meal. Client #3 was not offered alternative choices of activities or the use of pictures during the observation when he transitioned from eating his meal to preparing for work. Client #3 was not offered other activity during the observation.</p> <p>During observation at the day services on 5/21/14 from 9:48 AM until 10:32 AM, client #3 was not prompted to use pictures as a communication system. Client #3 sat in a room and was prompted to wait for a movie by workshop staff #1 as he sat on a chair with his hands over his ears. Client #3 was offered a ball activity, but did not respond.</p> <p>The Community Supports Coordinator was interviewed on 5/21/14 at 10:00 AM. She indicated client #3 was in the same area of the day services all day and stated, "He doesn't like moving around." She indicated he liked Disney movies and will calm when the movie begins. She indicated client #3 did not use a communication system as he refused to use it and the day services had</p>			

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	<p>discontinued his objective regarding the use of pictures as a communication strategy.</p> <p>Workshop staff #1 was interviewed on 5/21/14 at 10:01 AM and indicated client #3 refused all activities except movies and listening to music. She stated client #3 was "much more calm now than he was this morning. He was very agitated this morning and yesterday."</p> <p>Client #3's records were reviewed on 5/21/14 at 2:55 PM. An ISP dated 3/13/14 indicated objectives to choose between pictures of activities and to identify coins. A Behavior Support Plan dated 3/13/14 indicated:</p> <p><b>"GOAL:</b> To increase appropriate social interactions by decreasing episodes of inappropriate social behaviors defined as self-injurious behavior (SIB), noncompliance, physical aggression and public masturbation.</p> <p><b>DEFINITION OF BEHAVIOR</b> Signs/Symptoms of autism: failure to respond to name, avoiding eye contact with other people, repetitive movements such as rocking and twirling, self-abusive behavior such as biting or head-banging. Physical aggression: hitting, kicking, moving others out of the way, biting,</p>			

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	<p>scratching. SIB: pinching, picking, hitting and scratching self.</p> <p>Noncompliance: refusal to comply with ADL (adult daily living skills)'s, hygiene and simple tasks. Public masturbation: masturbation in the presence of others while not in his bedroom or bathroom.</p> <p><b>POSITIVE STRATEGIES</b></p> <p>Provide a calm, positive and relaxed environment.</p> <p>Be patient, consistent and repetitive.</p> <p>Prompt [Client #3] that one activity is going to end and another is going to begin. This allows him time to process the transition.</p> <p>Offer structure to [Client #3]' s daily routine.</p> <p>Be firm in your expectations of his involvement when introducing new activities/foods. Be clear and direct, "<b>This is what we are doing today.</b>"</p> <p>Staff need to be knowledgeable of [client #3]' s triggers and attune themselves to signals of potential crisis behavior.</p> <p>Staff should attune themselves to [client #3] to help him communicate to them his wants/needs.</p> <p>Provide verbal praise often throughout the day as encouragement and to reinforce replacement behaviors...</p> <p>A Behavior Assessment Tool (BAT) dated</p>			

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	<p>2/5/14 was reviewed on 5/28/14 at 2:45 PM and indicated the following:</p> <p>"[Client #3]'s behavioral issues began when he was very young and was diagnosed at the [Hospital]. He is limited in many areas such as verbal skills, safety skills, hygiene and ADLs. [Client #3] can feed himself, but needs assistance on eating slowly and small bites. [Client #3] can complete simple tasks when given single step instructions. [Client #3] also displays extreme sensory issues and needs a sensory program or diet to help reduce his anxiety and boredom.</p> <p><b>Functional Assessment:</b> The Functional Assessment Screening Tool was completed to assess the most likely variables for functions of [Client #3]'s behaviors. The behaviors assessed were self-injurious behaviors, physical aggression, uncooperativeness, and public masturbation. The most likely variables are social and automatic reinforcement in the forms of attention, access to specific activities, escape (task avoidance), sensory stimulation and pain attenuation.</p> <p><b>Target Behaviors:</b> Physical Aggression, kicking, moving others out of the way, etc.</p> <p><b>Definition:</b> Hitting,</p>			

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	<p>SIB Pinching, picking, hitting and scratching of self</p> <p>Uncooperativeness Refusal to comply with ADLs, Hygiene and simple tasks</p> <p>Public Masturbation Masturbation in the presence of others.</p> <p><b>Replacement Behaviors:</b></p> <p>Activities/Exercise Completing simple tasks, walking, riding bike, etc.</p> <p>Communication Communicating thro ugh sign lang uag e, hear ing ver bal pro mpt s fro m staf f, etc.</p> <p>Compliance Completion of reasonable req uest</p>			

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	<p>S...</p> <p><b>Proactive Interventions:</b> [Client #3] will benefit from a calm, positive, and relaxed environment.</p> <p>The key to working with [client #3] is to have patience, be consistent, and repetitive.</p> <p>Providing prompts to [client #3] that one activity is going to end and another is going to begin allows him time to process the transition.</p> <p>Offer structure to [client #3]'s daily routine. If he knows what to expect on a daily basis he will be better able to deal with the daily expectations, i.e. shower, medication, meal time, community outings, day program, etc.</p> <p>When introducing new activities and/or foods to [client #3] be firm in your expectations of his involvement and be clear and direct, '<b>This is what we are doing today.</b>'</p> <p>It is important that we remain consistent in our expectations of [client #3]. If [client #3] refuses to participate in an activity/ meal request, reintroduce the activity/ meal request at the next scheduled time. It often takes 60-90</p>			

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	<p>times of presentation before he may become willing to engage/ try it independently.</p> <p>Staff members working with [client #3] at home need to understand his triggers and attune themselves to signals of potential crisis behavior. By being aware of such signals, [client #3]'s staff can help de-escalate the behaviors and protect themselves and [client #3].</p> <p>[Client #3]'s verbal communication skills are limited, and he currently communicates using gestures, and leading people to what he wants and/or needs. Staff should attune themselves to [client #3] to help him communicate to them his wants and/or needs.</p> <p>Provide [client #3] with verbal praise often throughout the day as encouragement and to reinforce replacement behaviors....</p> <p><b>Guidelines for Teaching Functional Replacement Behaviors</b> <i>The idea of replacement behaviors is that they be taught and used throughout the day and not just when the person is active in displaying target behaviors. They are to be incompatible with target</i></p>			

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	<p><i>behaviors, for example if a person is completing a relaxation technique he or she cannot be actively engaging in physical aggression.</i></p> <p><u>Teaching a New Activity:</u> One outlet for [client #3]'s agitation and boredom is completing an activity, i.e., games, puzzles, coloring, etc. Staff will continually introduce [client #3] to different activities with the intention of developing a routine of activities that he enjoys and will complete independently or with staff. This will give [client #3] one on one interaction with staff, which helps build his communication skills and social skills.</p> <ol style="list-style-type: none"> <li>1. Set [client #3] in front of the activity</li> <li>2. Show him the activity and allow him to complete it on his own</li> <li>3. If [client #3] does not respond then help him by using the 'hand over hand' technique to complete the activity until he is able to perform the activity on his own (hand over hand is completed by staff putting their hand on top of [client #3]'s hand to gently guide it to the activity to be completed, but do not force</li> </ol>						

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	<p>[client #3] to participate)</p> <p>4. State to [client #3] that he is working (sic) an activity and then praise him enthusiastically after his attempt or completion of the activity</p> <p>5. Repetition with [client #3] is good until he learns the desired activity well enough to complete it on his own...</p> <p><u>Communication Board/Picture Book:</u> Because [client #3] is non-verbal, he participates in limited communication and has the capability to learn how to communicate PECS (picture exchange communication system) or some form of picture system...</p> <p>First-Then, Timers and Highlighted Schedule A daily schedule utilizing pictures to communicate daily activities has proven effective in alleviating anxiety for [client #3] by highlighting transitions in his daily activities. In addition, [client #3] appears to respond well to cues that indicate the next scheduled activity such as utilizing 'First-Then' cues such as, '[client #3] reading first, then gym.' The use of a kitchen timer can also be effective with communicating a desired length of time to [client #3]. [Client #3]</p>			

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	<p>performs an activity until the timer rings. The more [client #3] understands, the less anxious he is when interacting with others, especially with those individuals he is not yet accustomed.</p> <p><b>ABA therapy</b> ABA therapy is based on careful study (analysis) of each behavior; breaking down each behavior into even smaller behaviors (task analysis) and gradually teaching each small behavior one at a time, using rewards in very specific ways (shaping). While uniquely adapted to each child (individualized), this is a highly structured, rigorous, systematic and consistent (in all locations) teaching approach, which is organized around:</p> <ol style="list-style-type: none"> <li>1. The specific way a request is made of the child (Antecedents)</li> <li>2. The child's response to requests (Target Behaviors) and</li> <li>3. How adults react to the child's correct/incorrect responses (Consequences)</li> </ol> <p>Within [client #3]'s ABA program, a positive and systematic approach to teaching functional skills and reducing behavior problems will be emphasized. The keys to [client #3]'s success are of the utmost importance and can be achieved through creativity, flexibility,</p>			

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	<p>and capitalizing on resources available to [client #3]. In the initial phases of ABA therapy, it is important that all members of [client #3]'s team adhere consistently to the smallest details of his ABA therapy. As [client #3] masters skills, it becomes important to deliberately increase variability in order to facilitate generalization to all persons and settings in his natural environment.</p> <p>An example of the use of ABA: Taking [client #3] in to a community setting and getting him to engage in an activity</p> <p>Give [client #3] a small task to complete</p> <p>Provide a reinforcement immediately following the completion of the task</p> <p>Pair the reinforcement with verbal praise and/or high five</p> <p>Give [client #3] another small task to complete</p> <p>Continue with the task/reinforcement combination until he completes the entire task</p> <p>After several successful completions of the task, slowly remove the reinforcement</p> <p>Below are a list of suggestions for modifications and areas to be aware of when working with [client #3] and his sensory issues.</p> <p><b>Environmental Accommodations</b></p>			

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	<ul style="list-style-type: none"> <li>· Provide structure and predictability of schedule</li> <li>· Provide opportunities to be included with typically developing peers</li> <li>· Reduce level of noise, proximity of other peers</li> <li>· Use natural lighting whenever possible</li> <li>· Avoid crowded areas; help [client #3] gradually desensitize to large crowded environments</li> <li>· Encourage opportunities to move</li> <li>· Remove or minimize stressful events whenever possible</li> <li>· Provide support for transitions, i.e. transitional object, job or task to rove from one location to another...."</li> </ul> <p>Client #3's goals at the day services were reviewed on 5/22/14 at 2:50 PM and indicated ISP objectives dated 3/15/13 "I will use my communication device," and "I will utilize appropriate hygiene." ISP goals dated 3/13/14 indicated "I will report to my homeroom in the morning and afternoon with 2 verbal prompts or less," and "I will utilize appropriate (sic) hygiene after using the restroom with two verbal prompts or less."</p> <p>The QIDP (Qualified Intellectual</p>			

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W000193	<p>Disabilities Professional) was interviewed on 5/28/14 at 12:35 PM and indicated client #3's objectives and behavior plan should have been implemented, and staff needed continuing training to ensure they continued to prompt client #3 to activity and the use of pictures for communication. When asked about corrective action taken to address client #3's self injurious behavior, she indicated a behavioral clinician had been contacted to complete an evaluation and assist with developing a plan to address his self injurious behavior, and staff had been inserviced on the plan. She stated, "there have been some inconsistencies" in carrying out client #3's plan and the house manager and the QIDP were to monitor implementation of client #3's plan.</p> <p>9-3-2(a)</p> <p>483.430(e)(3)</p>			

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	<p><b>STAFF TRAINING PROGRAM</b> Staff must be able to demonstrate the skills and techniques necessary to administer interventions to manage the inappropriate behavior of clients.</p> <p>Based on observation, record review and interview, for 1 of 4 sampled clients (clients #3), the facility staff failed to demonstrate knowledge and implement proactive techniques to manage client #3's identified behaviors.</p> <p>Findings include:</p> <p>During observations at the group home on 5/20/14 from 4:30 PM until 6:05 PM, client sat on the sofa and hummed with his hands covering his ears except when he ate his meal. Client #3 was prompted once to engage in a coloring activity, but did not respond. Client #3 was not offered alternative choices of activities or the use of pictures during the observation. Client #3 was not offered other activity during the observation.</p> <p>During observation at the group home on 5/21/14 from 6:22 AM until 8:30 AM, client #3 sat humming with his hands covering his ears at 7:25 AM except when he ate his meal. Client #3 was not offered alternative choices of activities or the use of pictures during the observation. Client #3 was not offered other activity during the observation.</p>	W000193	The facility will ensure that staff will be able to demonstrate the skills and techniques necessary to administer interventions to manage the inappropriate behavior of clients. The Behavior Clinician will train staff on proactive strategies and alternate activities for client #3. All staff (including workshop staff) will be trained on proactive strategies and alternate activities to manage client #3's behaviors. The QIDP and RM will complete weekly active habilitation forms to ensure client #3's plan is being implemented. The QIDP and will complete day program observations form two times a week. In addition, a member of the operations team will complete weekly day program observations.	06/28/2014

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	<p>Client #3's records were reviewed on 5/21/14 at 2:55 PM. An ISP dated 3/13/14 indicated objectives to choose between pictures of activities and to identify coins. A Behavior Support Plan dated 3/13/14 indicated:</p> <p><b>"GOAL:</b> To increase appropriate social interactions by decreasing episodes of inappropriate social behaviors defined as self-injurious behavior (SIB), noncompliance, physical aggression and public masturbation.</p> <p><b>INTERMEDIATE OBJECTIVE:</b> [Client #3] will exhibit no more than 66 episodes of inappropriate social behavior per month across 6 consecutive months by 9/30/14.</p> <p><b>OBJECTIVE:</b> [Client #3] will exhibit no more than 50 episodes of inappropriate social behavior per month across 6 consecutive months by 3/31/15.</p> <p><b>DEFINITION OF BEHAVIOR</b> Signs/Symptoms of autism: failure to respond to name, avoiding eye contact with other people, repetitive movements such as rocking and twirling, self-abusive behavior such as biting or head-banging. Physical aggression: hitting, kicking, moving others out of the way, biting,</p>			
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	<p>scratching. SIB: pinching, picking, hitting and scratching self.</p> <p>Noncompliance: refusal to comply with ADL (adult daily living skills)'s, hygiene and simple tasks. Public masturbation: masturbation in the presence of others while not in his bedroom or bathroom.</p> <p><b>POSITIVE STRATEGIES</b></p> <p>Provide a calm, positive and relaxed environment.</p> <p>Be patient, consistent and repetitive.</p> <p>Prompt [Client #3] that one activity is going to end and another is going to begin. This allows him time to process the transition.</p> <p>Offer structure to [Client #3]'s daily routine.</p> <p>Be firm in your expectations of his involvement when introducing new activities/foods. Be clear and direct, <b>'This is what we are doing today.'</b></p> <p>Staff need to be knowledgeable of [client #3]'s triggers and attune themselves to signals of potential crisis behavior.</p> <p>Staff should attune themselves to [client #3] to help him communicate to them his wants/needs.</p> <p>Provide verbal praise often throughout the day as encouragement and to reinforce replacement behaviors...</p> <p>A Behavior Assessment Tool (BAT) dated</p>			

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	<p>2/5/14 was reviewed on 5/28/14 at 2:45 PM and indicated the following:</p> <p>"[Client #3]'s behavioral issues began when he was very young and was diagnosed at the [Hospital]. He is limited in many areas such as verbal skills, safety skills, hygiene and ADLs. [Client #3] can feed himself, but needs assistance on eating slowly and small bites. [Client #3] can complete simple tasks when given single step instructions. [Client #3] also displays extreme sensory issues and needs a sensory program or diet to help reduce his anxiety and boredom.</p> <p><b>Functional Assessment:</b> The Functional Assessment Screening Tool was completed to assess the most likely variables for functions of [Client #3]'s behaviors. The behaviors assessed were self-injurious behaviors, physical aggression, uncooperativeness, and public masturbation. The most likely variables are social and automatic reinforcement in the forms of attention, access to specific activities, escape (task avoidance), sensory stimulation and pain attenuation.</p> <p><b>Target Behaviors:</b> Physical Aggression, kicking, moving others out of the way, etc.</p> <p><b>Definition:</b> Hitting,</p>			

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	<p>SIB Pinching, picking, hitting and scratching of self</p> <p>Uncooperativeness Refusal to comply with ADLs, Hygiene and simple tasks</p> <p>Public Masturbation Masturbation in the presence of others.</p> <p><b>Replacement Behaviors:</b></p> <p>Activities/Exercise Completing simple tasks, walking, riding bike, etc.</p> <p>Communication Communicating thro ugh sign lang uag e, hear ing ver bal pro mpt s fro m staf f, etc.</p> <p>Compliance Completion of reasonable req uest</p>			

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	<p>S...</p> <p><b>Proactive Interventions:</b> [Client #3] will benefit from a calm, positive, and relaxed environment.</p> <p>The key to working with [client #3] is to have patience, be consistent, and repetitive.</p> <p>Providing prompts to [client #3] that one activity is going to end and another is going to begin allows him time to process the transition.</p> <p>Offer structure to [client #3]'s daily routine. If he knows what to expect on a daily basis he will be better able to deal with the daily expectations, i.e. shower, medication, meal time, community outings, day program, etc.</p> <p>When introducing new activities and/or foods to [client #3] be firm in your expectations of his involvement and be clear and direct, '<b>This is what we are doing today.</b>'</p> <p>It is important that we remain consistent in our expectations of [client #3]. If [client #3] refuses to participate in an activity/ meal request, reintroduce the activity/ meal request at the next scheduled time. It often takes 60-90</p>			

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	<p>times of presentation before he may become willing to engage/ try it independently.</p> <p>Staff members working with [client #3] at home need to understand his triggers and attune themselves to signals of potential crisis behavior. By being aware of such signals, [client #3]'s staff can help de-escalate the behaviors and protect themselves and [client #3].</p> <p>[Client #3]'s verbal communication skills are limited, and he currently communicates using gestures, and leading people to what he wants and/or needs. Staff should attune themselves to [client #3] to help him communicate to them his wants and/or needs.</p> <p>Provide [client #3] with verbal praise often throughout the day as encouragement and to reinforce replacement behaviors....</p> <p><b>Guidelines for Teaching Functional Replacement Behaviors</b> <i>The idea of replacement behaviors is that they be taught and used throughout the day and not just when the person is active in displaying target behaviors.</i></p>			

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	<p><i>They are to be incompatible with target behaviors, for example if a person is completing a relaxation technique he or she cannot be actively engaging in physical aggression.</i></p> <p><u>Teaching a New Activity:</u> One outlet for [client #3]'s agitation and boredom is completing an activity, i.e., games, puzzles, coloring, etc. Staff will continually introduce [client #3] to different activities with the intention of developing a routine of activities that he enjoys and will complete independently or with staff. This will give [client #3] one on one interaction with staff, which helps build his communication skills and social skills.</p> <ol style="list-style-type: none"> <li>1. Set [client #3] in front of the activity</li> <li>2. Show him the activity and allow him to complete it on his own</li> <li>3. If [client #3] does not respond then help him by using the 'hand over hand' technique to complete the activity until he is able to perform the activity on his own (hand over hand is completed by staff putting their hand on top of [client #3]'s hand to gently guide it to the activity to be</li> </ol>			

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	<p>completed, but do not force [client #3] to participate)</p> <p>4. State to [client #3] that he is working (sic) an activity and then praise him enthusiastically after his attempt or completion of the activity</p> <p>5. Repetition with [client #3] is good until he learns the desired activity well enough to complete it on his own...</p> <p><u>Communication Board/Picture Book:</u> Because [client #3] is non-verbal, he participates in limited communication and has the capability to learn how to communicate PECS (picture exchange communication system) or some form of picture system...</p> <p>First-Then, Timers and Highlighted Schedule A daily schedule utilizing pictures to communicate daily activities has proven effective in alleviating anxiety for [client #3] by highlighting transitions in his daily activities. In addition, [client #3] appears to respond well to cues that indicate the next scheduled activity such as utilizing 'First-Then' cues such as, '[Client #3] reading first, then gym.' The use of a kitchen timer can also be effective with communicating a desired</p>			

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	<p>length of time to [client #3]. [Client #3] performs an activity until the timer rings. The more [client #3] understands, the less anxious he is when interacting with others, especially with those individuals he is not yet accustomed.</p> <p><b>ABA therapy</b> ABA therapy is based on careful study (analysis) of each behavior; breaking down each behavior into even smaller behaviors (task analysis) and gradually teaching each small behavior one at a time, using rewards in very specific ways (shaping). While uniquely adapted to each child (individualized), this is a highly structured, rigorous, systematic and consistent (in all locations) teaching approach, which is organized around:</p> <ol style="list-style-type: none"> <li>1. The specific way a request is made of the child (Antecedents)</li> <li>2. The child's response to requests (Target Behaviors) and</li> <li>3. How adults react to the child's correct/incorrect responses (Consequences)</li> </ol> <p>Within [Client #3]'s ABA program, a positive and systematic approach to teaching functional skills and reducing behavior problems will be emphasized. The keys to [client #3]'s success are of the utmost importance and can be</p>			

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	<p>achieved through creativity, flexibility, and capitalizing on resources available to [client #3]. In the initial phases of ABA therapy, it is important that all members of [client #3]'s team adhere consistently to the smallest details of his ABA therapy. As [client #3] masters skills, it becomes important to deliberately increase variability in order to facilitate generalization to all persons and settings in his natural environment.</p> <p>An example of the use of ABA: Taking [client #3] in to a community setting and getting him to engage in an activity     Give [client #3] a small task to complete     Provide a reinforcement immediately following the completion of the task     Pair the reinforcement with verbal praise and/or high five     Give [client #3] another small task to complete     Continue with the task/reinforcement combination until he completes the entire task     After several successful completions of the task, slowly remove the reinforcement Below are a list of suggestions for modifications and areas to be aware of when working with [client #3] and his sensory issues.</p>			

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	<p><b>Environmental Accommodations</b></p> <ul style="list-style-type: none"> <li>· Provide structure and predictability of schedule</li> <li>· Provide opportunities to be included with typically developing peers</li> <li>· Reduce level of noise, proximity of other peers</li> <li>· Use natural lighting whenever possible</li> <li>· Avoid crowded areas; help [client #3] gradually desensitize to large crowded environments</li> <li>· Encourage opportunities to move</li> <li>· Remove or minimize stressful events whenever possible</li> <li>· Provide support for transitions, i.e. transitional object, job or task to rove from one location to another...."</li> </ul> <p>The QIDP (Qualified Intellectual Disabilities Professional) was interviewed on 5/28/14 at 12:35 PM and indicated client #3's objectives and behavior plan should have been implemented, and staff needed continuing training to ensure they continued to prompt client #3 to activity and the use of pictures for communication. She indicated staff had been inserviced on the plan. She stated, "there have been some inconsistencies" in carrying out client #3's plan and the</p>			
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W000218	<p>house manager and the QIDP were to monitor implementation of client #3's plan.</p> <p>9-3-3(a)</p> <p>483.440(c)(3)(v) INDIVIDUAL PROGRAM PLAN The comprehensive functional assessment must include sensorimotor development.</p> <p>Based upon record review and interview for 1 of 4 sampled clients (client #3), the facility failed to assess his needs in sensorimotor skills.</p> <p>Findings include:</p> <p>During observations at the group home on 5/20/14 from 4:30 PM until 6:05 PM, client #3 sat on the sofa and hummed with his hands covering his ears except when he ate his meal.</p> <p>During observation at the group home on 5/21/14 from 6:22 AM until 8:30 AM, client #3 sat humming with his hands covering his ears at 7:25 AM except when he ate his meal.</p> <p>During observation at the day services on 5/21/14 from 9:48 AM until 10:32 AM, client #3 sat in a room and placed his hands over his ears.</p> <p>The Community Supports Coordinator was interviewed on 5/21/14 at 10:00 AM. She indicated client #3 was in the same area of the day services all day and stated, "He doesn't like</p>	W000218	<p>The facility will ensure that the comprehensive functional assessment will include sensorimotor development. A sensorimotor evaluation has been scheduled for client #3. Recommendations from the evaluation will be implemented into his individual program plan. Staff will be trained on any changes to the plan. No other clients were affected by this deficient practice. An OT evaluation has been scheduled for client #3 to be performed by an Occupational Therapist. The QIDP and RM will complete weekly active habilitation observations to ensure the plan is being followed. The QIDP completes the comprehensive functional assessment on an annual basis. The Clinical Supervisor will review all comprehensive functional assessments.</p>	06/28/2014

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	<p>moving around." She indicated client #3 liked Disney movies and would calm when the movie began.</p> <p>Workshop staff #1 was interviewed on 5/21/14 at 10:01 AM and indicated client #3 refused all activities except movies and listening to music. She stated client #3 was "much more calm now than he was this morning. He was very agitated this morning and yesterday."</p> <p>Client #3's records were reviewed on 5/21/14 at 2:55 PM. The record indicated client #3 had been admitted to the group home on 4/12/12. There was no evidence of an evaluation of client #3's sensorimotor skills after being admitted to the group home.</p> <p>A Behavior Assessment Tool (BAT) dated 2/5/14 was reviewed on 5/28/14 at 2:45 PM and indicated the following:</p> <p>"[Client #3]'s behavioral issues began when he was very young and was diagnosed at the [Hospital]. He is limited in many areas such as verbal skills... [Client #3] can complete simple tasks when given single step instructions. [Client #3] also displays extreme sensory issues and needs a sensory program or diet to help reduce his anxiety and boredom.</p> <p><b>Functional Assessment:</b> The Functional Assessment Screening Tool was completed to assess the most likely variables for functions of [client #3]'s behaviors. The behaviors assessed were self-injurious behaviors, physical aggression, uncooperativeness, and public masturbation. The most likely variables are...sensory stimulation and pain attenuation."</p> <p>The QIDP (Qualified Intellectual Disabilities</p>			

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W000220	<p>Professional) was interviewed on 5/28/14 at 12:35 PM and indicated there had been no evaluation of client #3's sensorimotor skills or of client #3's behavior of holding his hands over his ears and humming.</p> <p>9-3-4(a)</p> <p>483.440(c)(3)(v) INDIVIDUAL PROGRAM PLAN The comprehensive functional assessment must include speech and language development. Based upon record review and interview, the facility failed for 1 of 4 sampled clients (client #3) to assess his needs in speech and language.</p> <p>Findings include:</p> <p>During observations at the group home on 5/20/14 from 4:30 PM until 6:05 PM, client #3 sat on the sofa and hummed with his hands covering his ears except when he ate his meal. Client #3 did not use speech during the observation. Client #3 was prompted once to engage in a coloring activity, but did not respond.</p>	W000220	<p>The facility will ensure that the comprehensive functional assessment will include speech and language development. A speech and language evaluation has been scheduled. Recommendations from the evaluation will be incorporated into client #3's individual program plan. Staff will be trained on implementing the recommendations from the speech and language evaluation assessment. The QIDP will complete weekly active habilitation observations to ensure the plan is being followed. No other clients were affected by this deficient practice. A speech and language evaluation has been scheduled for</p>	06/28/2014

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	<p>Client #3 was not offered the use of pictures during the observation when he transitioned from pre-meal to meal to post meal activities.</p> <p>During observation at the group home on 5/21/14 from 6:22 AM until 8:30 AM, client #3 sat humming with his hands covering his ears at 7:25 AM except when he ate his meal. Client #3 did not use speech during the observation. Client #3 was not offered the use of pictures during the observation when he transitioned from eating his meal to preparing for work.</p> <p>During observation at the day services on 5/21/14 from 9:48 AM until 10:32 AM, client #3 was not prompted to use pictures as a communication system. Client #3 sat in a room and was prompted to wait for a movie by workshop staff #1 as he sat on a chair with his hands over his ears. Client #3 was offered a ball activity, but did not respond. Client #3 did not use speech during the observation.</p> <p>The Community Supports Coordinator was interviewed on 5/21/14 at 10:00 AM. She indicated client #3 was in the same area of the day services all day and stated, "He doesn't like moving around." She indicated he liked Disney movies and</p>		<p>client #3 to be preformed by a Speech Therapist. The QIDP and RM will complete weekly active habilitation observations to ensure the plan is being followed. The QIDP completes the comprehensive functional assessment on an annual basis. The Clinical Supervisor will review all comprehensive functional assessments.</p>	

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	<p>would calm when the movie began. She indicated client #3 did not use a communication system as he refused to use it and the day services had discontinued his objective regarding the use of pictures as a communication strategy.</p> <p>Workshop staff #1 was interviewed on 5/21/14 at 10:01 AM and indicated client #3 refused all activities except movies and listening to music. She stated client #3 was "much more calm now than he was this morning. He was very agitated this morning and yesterday."</p> <p>Client #3's records were reviewed on 5/21/14 at 2:55 AM. A Lifestyle Plan dated 3/13/14 indicated client #3 had used a picture communication system in the past. An ISP dated 3/13/14 indicated objectives to choose between pictures of activities and to identify coins. A Behavior Support Plan dated 3/13/14 indicated:</p> <p style="padding-left: 40px;"><b>"GOAL:</b> To increase appropriate social interactions by decreasing episodes of inappropriate social behaviors defined as self-injurious behavior (SIB), noncompliance, physical aggression and public</p>			

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	<p>masturbation...</p> <p><b>POSITIVE STRATEGIES...</b>Staff should attune themselves to [client #3] to help him communicate to them his wants/needs...."</p> <p>A Behavior Assessment Tool (BAT) dated 2/5/14 was reviewed on 5/28/14 at 2:45 PM and indicated the following:</p> <p>"[Client #3]'s behavioral issues began when he was very young and was diagnosed at the [Hospital]. He is limited in many areas such as verbal skills...</p> <p><b>Functional Assessment:</b> The Functional Assessment Screening Tool was completed to assess the most likely variables for functions of [client #3]' s behaviors. The behaviors assessed were self-injurious behaviors, physical aggression, uncooperativeness, and public masturbation. The most likely variables are social and automatic reinforcement in the forms of attention, access to specific activities, escape (task avoidance), sensory stimulation and pain attenuation...</p> <p><b>Replacement Behaviors:</b> Communication      Communicating  thro ugh sign</p>			
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	<p>lang uag e, hear ing ver bal pro mpt s fro m staf f, etc.</p> <p>Compliance Completion of reasonable req uest s...</p> <p><b>Proactive Interventions:...</b> [Client #3] ' s verbal communication skills are limited, and he currently communicates using gestures, and leading people to what he wants and/or needs. Staff should attune themselves to [client #3] to help him communicate to them his wants and/or needs...."</p> <p><u>Communication Board/Picture Book:</u> Because [client #3] is non-verbal, he participates in</p>			

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	<p>limited communication and has the capability to learn how to communicate PECS (picture exchange communication system) or some form of picture system...</p> <p>First-Then, Timers and Highlighted Schedule</p> <p>A daily schedule utilizing pictures to communicate daily activities has proven effective in alleviating anxiety for [client #3] by highlighting transitions in his daily activities. In addition, [client #3] appears to respond well to cues that indicate the next scheduled activity such as utilizing " First-Then " cues such as, " [Client #3] reading first, then gym". The use of a kitchen timer can also be effective with communicating a desired length of time to [client #3]. [Client #3] performs an activity until the timer rings. The more [client #3] understands, the less anxious he is when interacting with others, especially with those individuals he is not yet accustomed....</p> <p>Client #3's goals at the day services were reviewed on 5/22/14 at 2:50 PM and</p>			

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W000249	<p>indicated ISP objectives dated 3/15/13 "I will use my communication device," and "I will utilize appropriate hygiene." ISP goals dated 3/13/14 indicated "I will report to my homeroom in the morning and afternoon with 2 verbal prompts or less," and "I will utilize appropriate (sic) hygiene after using the restroom with two verbal prompts or less."</p> <p>The QIDP (Qualified Intellectual Disabilities Professional) was interviewed on 5/28/14 at 12:35 PM and indicated client #3's needs in communication had not been assessed by a speech and language professional since his admission to the group home.</p> <p>9-3-4(a)</p> <p>483.440(d)(1) PROGRAM IMPLEMENTATION As soon as the interdisciplinary team has formulated a client's individual program plan, each client must receive a continuous active treatment program consisting of needed interventions and services in sufficient number and frequency to support the achievement of the objectives identified in the individual program plan.</p> <p>Based upon observation, record review and interview, the facility failed for 1 of 4 sampled</p>	W000249	The facility will ensure that as soon as the interdisciplinary team has formulated a client's individual	06/28/2014			

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	<p>clients (client #3) to implement individual support plan (ISP) objectives.</p> <p>Findings include:</p> <p>During observations at the group home on 5/20/14 from 4:30 PM until 6:05 PM, client #3 sat on the sofa and hummed at a high volume with his hands covering his ears except when he ate his meal. Client #3 was prompted once to engage in a coloring activity, but did not respond. Client #3 was not offered alternative choices of activities or the use of pictures during the observation. Client #3 was not offered other activity during the observation.</p> <p>During observation at the group home on 5/21/14 from 6:22 AM until 8:30 AM, client #3 sat humming at a loud volume with his hands covering his ears at 7:25 AM except when he ate his meal. Client #3 was not offered alternative choices of activities or the use of pictures during the observation. Client #3 was not offered other activity during the observation.</p> <p>Client #3's records were reviewed on 5/21/14 at 2:55 PM. An ISP dated 3/13/14 indicated objectives to choose between pictures of activities and to identify coins. A Behavior Support Plan dated 3/13/14 indicated:</p> <p><b>"GOAL:</b> To increase appropriate social interactions by decreasing episodes of inappropriate social behaviors defined as self-injurious behavior (SIB), noncompliance, physical aggression and public masturbation.</p> <p><b>INTERMEDIATE OBJECTIVE:</b> [Client #3] will exhibit no more than 66 episodes of inappropriate social behavior per month across 6 consecutive months by 9/30/14.</p>		<p>program plan, each client will receive a continuous active treatment program consisting of needed interventions and services in sufficient number and frequency to support the achievement of the objectives identified in the individual program plan. Client #3's behavior support plan will be reviewed and revised to include recommendations from the behavioral assessment tool. The Behavior Clinician will train staff on proactive strategies and alternate activities for client #3. The QIDP will train staff on any revisions made to the individual program plan and on implementation of existing objectives. The QIDP and RM will initially complete active habilitation observations twice weekly to ensure client #3's plan is being implemented. No other clients were affected by this deficient practice. In addition, a member of the operations team will complete weekly day program observations until the location has demonstrated compliance. Monitoring will continue no less than bi-monthly for an additional 60 days.</p>	

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	<p><b>OBJECTIVE:</b> [Client #3] will exhibit no more than 50 episodes of inappropriate social behavior per month across 6 consecutive months by 3/31/15.</p> <p><b>DEFINITION OF BEHAVIOR</b> Signs/Symptoms of autism: failure to respond to name, avoiding eye contact with other people, repetitive movements such as rocking and twirling, self-abusive behavior such as biting or head-banging. Physical aggression: hitting, kicking, moving others out of the way, biting, scratching. SIB: pinching, picking, hitting and scratching self. Noncompliance: refusal to comply with ADL (adult daily living skills)'s, hygiene and simple tasks. Public masturbation: masturbation in the presence of others while not in his bedroom or bathroom.</p> <p><b>POSITIVE STRATEGIES</b></p> <p>Provide a calm, positive and relaxed environment. Be patient, consistent and repetitive. Prompt [client #3] that one activity is going to end and another is going to begin. This allows him time to process the transition. Offer structure to [client #3]'s daily routine. Be firm in your expectations of his involvement when introducing new activities/foods. Be clear and direct, <b>'This is what we are doing today.'</b> Staff need to be knowledgeable of [client #3]'s triggers and attune themselves to signals of potential crisis behavior. Staff should attune themselves to [client #3] to help him communicate to them his wants/needs. Provide verbal praise often throughout the day as encouragement and to reinforce replacement behaviors...</p>			
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	<p>A Behavior Assessment Tool (BAT) dated 2/5/14 was reviewed on 5/28/14 at 2:45 PM and indicated the following:</p> <p><b>"Guidelines for Teaching Functional Replacement Behaviors</b>  <i>The idea of replacement behaviors is that they be taught and used throughout the day and not just when the person is active in displaying target behaviors. They are to be incompatible with target behaviors, for example if a person is completing a relaxation technique he or she cannot be actively engaging in physical aggression.</i></p> <p><u>Teaching a New Activity:</u> One outlet for [client #3]'s agitation and boredom is completing an activity, i.e., games, puzzles, coloring, etc. Staff will continually introduce [client #3] to different activities with the intention of developing a routine of activities that he enjoys and will complete independently or with staff. This will give [client #3] one on one interaction with staff, which helps build his communication skills and social skills.</p> <ol style="list-style-type: none"> <li>1. Set [client #3] in front of the activity</li> <li>2. Show him the activity and allow him to complete it on his own</li> <li>3. If [client #3] does not respond then help him by using the 'hand over hand' technique to complete the activity until he is able to perform the activity on his own (hand over hand is completed by staff putting their hand on top of [client #3]'s hand to gently guide it to the activity to be completed, but do not force [client #3] to participate)</li> <li>4. State to [client #3] that he is working an activity and then praise</li> </ol>			
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	<p>him enthusiastically after his attempt or completion of the activity</p> <p>5. Repetition with [client #3] is good until he learns the desired activity well enough to complete it on his own...</p> <p><u>Communication Board/Picture Book:</u> Because [client #3] is non-verbal, he participates in limited communication and has the capability to learn how to communicate PECS (picture exchange communication system) or some form of picture system...</p> <p>First-Then, Timers and Highlighted Schedule A daily schedule utilizing pictures to communicate daily activities has proven effective in alleviating anxiety for [client #3] by highlighting transitions in his daily activities. In addition, [client #3] appears to respond well to cues that indicate the next scheduled activity such as utilizing 'First-Then' cues such as, '[Client #3] reading first, then gym.' The use of a kitchen timer can also be effective with communicating a desired length of time to [client #3]. [Client #3] performs an activity until the timer rings. The more [client #3] understands, the less anxious he is when interacting with others, especially with those individuals he is not yet accustomed.</p> <p><b>ABA therapy</b> ABA therapy is based on careful study (analysis) of each behavior; breaking down each behavior into even smaller behaviors (task analysis) and gradually teaching each small behavior one at a time, using rewards in very specific ways (shaping). While uniquely adapted to each child (individualized), this is a highly structured, rigorous, systematic and consistent (in all locations) teaching approach, which is organized around:</p>			

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	<p>1. The specific way a request is made of the child (Antecedents)</p> <p>2. The child's response to requests (Target Behaviors) and</p> <p>3. How adults react to the child's correct/incorrect responses (Consequences)</p> <p>Within [Client #3]'s ABA program, a positive and systematic approach to teaching functional skills and reducing behavior problems will be emphasized. The keys to [client #3]'s success are of the utmost importance and can be achieved through creativity, flexibility, and capitalizing on resources available to [client #3]. In the initial phases of ABA therapy, it is important that all members of [client #3]'s team adhere consistently to the smallest details of his ABA therapy. As [client #3] masters skills, it becomes important to deliberately increase variability in order to facilitate generalization to all persons and settings in his natural environment.</p> <p>An example of the use of ABA: Taking [client #3] in to a community setting and getting him to engage in an activity Give [client #3] a small task to complete Provide a reinforcement immediately following the completion of the task Pair the reinforcement with verbal praise and/or high five Give [client #3] another small task to complete Continue with the task/reinforcement combination until he completes the entire task After several successful completions of the task, slowly remove the reinforcement Below are a list of suggestions for modifications and areas to be aware of when working with [client #3] and his sensory issues. <b>Environmental Accommodations</b></p>			

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	<ul style="list-style-type: none"> <li>· Provide structure and predictability of schedule</li> <li>· Provide opportunities to be included with typically developing peers</li> <li>· Reduce level of noise, proximity of other peers</li> <li>· Use natural lighting whenever possible</li> <li>· Avoid crowded areas; help [client #3] gradually desensitize to large crowded environments</li> <li>· Encourage opportunities to move</li> <li>· Remove or minimize stressful events whenever possible</li> <li>· Provide support for transitions, i.e. transitional object, job or task to rove from one location to another...."</li> </ul> <p>The QIDP (Qualified Intellectual Disabilities Professional) was interviewed on 5/28/14 at 12:35 PM and indicated client #3's ISP objectives and proactive strategies in his BSP to address his target behaviors should have been implemented.</p> <p>9-3-4(a)</p>			