

**PRINCETON UNIVERSITY  
DEPARTMENT OF PUBLIC SAFETY  
STANDARD OPERATING PROCEDURE**



***PERSONNEL EARLY INTERVENTION (PEI) SYSTEM***

**BY THE ORDER OF:**

**Executive Director Paul L. Ominsky**

**# OF PAGES:**

**7**

**EFFECTIVE DATE: April 3, 2018**

**ACCREDITATION STANDARD(S): 35.1.9**

**SUPERSEDES DIRECTIVE/SOP#: 034**

**PURPOSE:** The purpose of this standard operating procedure to establish guidelines for the Princeton University Department of Public Safety (DPS) Personnel Early Intervention (PEI) System. The early identification of employees that may require additional training or remedial action can increase agency accountability, detect patterns or trends of unacceptable conduct before that conduct escalates, and offer employees a better opportunity to meet the department’s mission and values statement.

**POLICY:** It shall be the policy of DPS that this comprehensive Personnel Early Intervention (PEI) System be initiated when certain types of performance indicators occur that indicate potentially escalating risk of harm to the public, the agency and/or the employee. Additionally, supervisors should recognize the actions of employees that could potentially lead not only to discipline, but referral to the Princeton University Employee Assistance Program (EAP).

**DEFINITION(S):**

**A. EMPLOYEE:**

All DPS personnel to include sworn, non-sworn, and civilian support staff.

**B. EMPLOYEE ASSISTANCE PROGRAM (EAP):**

A formal program designed to assist in the identification and resolution of concerns or problems (personal or job related), which may adversely affect an employee’s personal or professional well-being, or job performance. These personal concerns may include, but are not limited to, health, marital status, family, financial, substance abuse, emotional/stress, and other personal matters.

### C. PERSONNEL EARLY INTERVENTION (PEI) SYSTEM:

A system for the early warning and identification of agency employees who may need some type of corrective action or intervention and a procedure for collecting and evaluating materials required for implementing such corrective action.

### PROCEDURES:

#### A. Performance Indicators for Initiating PEI System Process Review [Accreditation 35.1.9 a, b]

1. The Personnel Early Intervention (PEI) System process review will be initiated as determined by the Executive Director or his/her designee or when an employee is directly involved in three (3) separate instances within a twelve (12) month period to include, but not limited to, the following:
  - a. Internal Affairs complaints against the employee, whether initiated by another employee or member of the public;
  - b. Civil actions filed against the employee;
  - c. Criminal investigations of, or criminal complaint against, the employee;
  - d. Any use of force by the employee that is formally determined or adjudicated to have been excessive, unjustified, or unreasonable;
  - e. Domestic violence investigations in which the employee is an alleged subject;
  - f. An arrest of the employee, including driving under the influence charge;
  - g. Sexual harassment claims against the employee;
  - h. Vehicular collisions involving the employee that are formally determined to have been the fault of the employee;
  - i. A positive drug test by the employee;
  - j. Cases or arrests by the employee that are rejected or dismissed by a court;
  - k. Cases in which evidence obtained by an employee is suppressed by a court;
  - l. Insubordination by the employee;
  - m. Neglect of duty by the employee;
  - n. Unexcused absences by the employee;

- o. Violations of departmental policies and processes that are objectively measurable and reasonably related to the potentially escalating harmful behavior by the employee; and
- p. Any other objectively measurable indicators, as determined by the Executive Director or designee, to be reasonably related to potentially escalating harmful behavior by the employee.

B. Administration and Tracking of PEI System [Accreditation 35.1.9 c, e]

1. The PEI system shall be administered and tracked by the Internal Affairs Unit overseen by the Associate Director of Support Services. The Associate Director shall be responsible for the following:
  - a. To review and identify affected employees based on current patterns of collected material utilizing available tracking systems, records, and processes approved by the Executive Director.
  - b. That employees who display the requisite number of performance indicators outlined in Section A.1 of this written directive trigger the PEI System review process.
  - c. At least every six months, personnel assigned to manage the approved PEI tracking systems, records, and processes shall conduct an audit to assess the accuracy and effectiveness of the information and report findings to the Associate Director.
  - d. Complete a documented annual evaluation to determine the effectiveness of the PEI System. The evaluation will document the number of interventions during the previous twelve (12) months, the course of action taken for each intervention, and a progress report on the performance of each employee, subsequent to the intervention. The report shall be provided to the Executive Director for review.
  - e. Ensure this directive is made available to the public upon request and posted on the DPS website;
  - f. Completion of annual report required by the prosecutor's office, which shall be made available to the public upon request and posted on the DPS website.
  - g. Ensure that written reports created or submitted pursuant to this directive that identify specific employees remain confidential and not made subject to public disclosure.

C. Personnel Early Intervention (PEI) System Reporting [Accreditation 35.1.9 d, f]

1. All supervisory personnel in an employee's chain of command are responsible for and required to report conduct or behavior as outlined in Section A.1 of this written directive to the Associate Director. This confidential report shall document the following information:
  - a. The specific performance indicator(s) that triggered the intervention as prescribed in Section A.1 of this written directive;
  - b. A supervisory summary, limited to the specific facts of the incident, avoiding any rendering of conclusions or determinations as to the involved employee. The supervisor will sign and date the written summary; and
  - c. A discussion between the on-duty or immediate supervisor and the involved employee, with the employee being provided the opportunity to make written comments to determine any potential underlying factors that may have been present regarding the incident in question. The employee will sign and date his or her comments and receive a copy of the written summary.
  - d. All supervisors of the rank of corporal and above shall be authorized and able to enter data into the designated electronic tracking system. However, only supervisors of the rank of sergeant and above will be authorized and able to view entered data.

D. Remedial/Corrective Action [Accreditation 35.1.9 g]

1. Once an employee has displayed the requisite number of performance indicators necessary to trigger the PEI System the course of action will be decided upon after the employee's immediate supervisor and Associate Director or designee meet to discuss the facts and circumstances surrounding the intervention. The Associate Director or designee will sign off on the recommended course of remedial action and the report will be forwarded through the chain of command to the Executive Director.
2. When the PEI System process is initiated the Associate Director or designee shall:
  - a. Formally notify the subject employee in writing;
  - b. Conference with the subject employee and appropriate supervisor(s);
  - c. Develop and administer a remedial program including the appropriate remedial/corrective actions listed below in Section D.3;
  - d. Continue to monitor the subject employee for at least three months, or until they conclude that the employees behavior has been remediated, whichever is longer;
  - e. Document and report findings to the Executive Director; and

- f. If warranted, recommend referral to the Internal Affairs Unit;
  - g. Ensure that any statement(s) made by the subject employee in connection with the PEI System review process is not used against the subject employee in any disciplinary or other proceeding.
3. One or more of the following courses of remedial action will be initiated for any employee whose actions necessitate the completion of an Early Intervention Report:
- a. No additional action or informal counseling;
  - b. Training or re-training;
  - c. Formal Counseling;
  - d. Intensive Supervision;
  - e. Fitness for Duty Examination;
  - f. Employee Assistance Program (EAP) referral; and
  - g. Any other appropriate remedial or corrective action.

E. Post-Intervention Monitoring and Documentation [Accreditation 35.1.9 f, g]

- 1. The immediate supervisor will monitor the employee after the completion of the Early Intervention Report for further activity that may warrant additional intervention.
- 2. When the supervisor review finds no issues of concern, no additional action is needed.
- 4. When action is warranted beyond informal counseling, the course of action taken and progress made by the employee will be documented by the immediate supervisor as follows:
  - a. Monthly progress reports submitted in memorandum format through the chain of command to the Executive Director or designee documenting the formal monitoring of employee for a minimum of twelve (12) weeks by the supervisor; and
  - b. In the Performance Improvement Plan Section of the employee's next performance evaluation.
- 5. The subject employee shall be provided a copy of, or allowed access to, reports generated by the PEI System and allowed to submit a written rebuttal and/or entry.
- 6. Completed Early Intervention Reports generated by the PEI system will be securely maintained by the Associate Director of Support Services, separate from the employee's personnel file.

F. Notification to Subsequent Law Enforcement Employer and County Prosecutor

1. If any employee who is or has been subject to the PEI System review process applies to or accepts employment with another law enforcement agency the Associate Director or designee shall notify the agency of the employees PEI review history and outcome.
2. Upon request, the Associate Director or designee shall share PEI review process files with the current or subsequent employing agency.
3. Upon initiation of the PEI System review process the Executive Director or designee shall make confidential written notification to the Mercer County Prosecutor or their designee. This notification shall include at a minimum the following information:
  - a. Identity of subject employee;
  - b. Nature of the triggering performance indicators; and
  - c. Planned remedial action/program.
4. Upon completion of the PEI System review process the Executive Director or designee shall make confidential written notification to the Mercer County Prosecutor or their designee. This notification shall detail the outcome of the review and any remedial actions taken on behalf of the subject employee.

G. Princeton University Employee Assistance Program (EAP) [Accreditation 35.1.9 h]

1. Princeton University has contracted with the Carebridge Corporation to provide confidential assistance to faculty, staff, and graduate students for managing work, personal or family issues at no charge to the participant.
2. The Carebridge Employee Assistance Program (EAP) for Faculty and Staff helps faculty and staff members work through many difficult personal issues such as, but not limited to:
  - a. Drug and/or alcohol abuse
  - b. Stress and depression
  - c. Financial issues
  - d. Interpersonal relationships
  - e. Married life and parenting
  - f. Grief and loss

3. The individual Work Life Programs assist with issues and referrals for the following types of services:
  - a. Child care
  - b. Elder care
  - c. Adoption
  - d. Time management and life balance
  - e. Personal financial management
4. Carebridge has an extensive online library of educational materials on a wide variety of topics available to all Faculty and Staff.
5. The services provided by Carebridge are available Twenty-four (24) hours a day, seven days a week, three hundred sixty-five (365) days a year.