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<td>James L Whalen</td>
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Early Intervention System

I. PURPOSE

This policy is intended to assist University of Cincinnati Police Division (UCPD) supervisors and managers in identifying officers and other employees whose performance warrants review and, where appropriate, intervention in circumstances that may have negative consequences for the employee, fellow employees, this agency, and/or the general public.

II. POLICY

It is the policy of the UCPD to establish a system for monitoring and reviewing incidents of risk to this agency and the involved employees. To this end, the Early Intervention System (EIS) shall be used as a means to identify and assess employee performance involved in potential-risk incidents and intervene where appropriate.

III. DEFINITIONS

Administrative Review: A documented evaluation of various types of police actions that do not require a formalized investigation however are subject to a supervisory or command level evaluation for adherence to policies, training and practices.

Employee Assistance Program: An employee assistance program (EAP) is a work-based intervention program designed to identify and assist employees in resolving personal problems (e.g., marital, financial or emotional problems; family issues; substance/alcohol abuse) that may be adversely affecting the employee’s performance.

Excessive Use of Force: The application of an amount and/or duration of force greater than that required to compel compliance of a non-compliant subject. This level of force would not be reasonably objective and would be inconsistent with policy and training.

Potential-Risk Incidents: Actions that may result in injury to employees or the public, may cause civil rights violations, could increase the civil liability to the department, or may cause this agency to lose public support and confidence in its ability to perform its duty in a professional manner.

Performance Improvement Plan: A Performance Improvement Plan (PIP) is a written document collaboratively developed by a supervisor and the subject employee that specifically identifies performance deficiencies, lists specific methods and actions the employee and employer will take to improve the performance deficiencies and documents an appropriate timeline(s) to demonstrate improvement.

Standards and Strategic Deployment Bureau (SSDB): Division function primarily responsible for supervising and executing investigations of employee misconduct allegations and the administering the EIS.

Use of Force: Any physical strike, instrumental contact with a person, or any significant
physical contact that restricts movement of a person. The term includes, but is not limited to the use of: firearms, CEWs, collapsible batons, chemical irritant, choke holds or hard hands, or the taking of a subject to the ground. The term does not include escorting or handcuffing a person with no or minimal resistance.

IV. PROCEDURES

A. General
1. An early intervention system (EIS) is a data-based police management tool that is designed to identify employees whose behavior is potentially at risk. An employee’s behavior is measured by reviewing the number of incidents within a specified time period such as citizen complaints, uses-of-force, tardiness, call offs, or any other behavior that is potentially problematic. The EIS is used to assist supervisory personnel in monitoring employee performance. UCPD expects that its supervisors intervene, correct, and preferably prevent employees from making poor decisions that can affect the problems from occurring.
2. Positive employee performance, recognition and awards is also documented in Guardian Tracking. Direction on positive performance entries is provided in the UCPD Awards and Recognition policy.
3. A comprehensive personnel EIS is an essential component to any well-managed law enforcement agency. Early identification of potential problem employees can increase agency accountability and offer employees a better opportunity to meet performance expectations, requirements and conform to the UCPD’s core principles and mission statement.
4. Supervisory personnel shall be familiar with alternatives and authorized actions they may take in response to personnel exhibiting behavioral problems, whether or not the information was provided through the EIS.
5. It is the duty of first-line supervisors to directly monitor the performance and behavior of personnel under their charge on a daily basis and to document employee conduct and corrective action in the EIS.
6. The EIS is a tool to assist supervisory personnel in monitoring employee performance based on information collected from multiple sources that is entered into the EIS.
7. The information for the EIS is entered in the agency’s Personnel Management Software – “Guardian Tracking”.
8. The EIS alerts supervisory personnel whenever an employee exceeds predefined thresholds established by the Police Chief based on recommendations from the Standards and Strategic Deployment Bureau and the EIS developer. These thresholds will be evaluated annually to determine if they are set at the correct level.

B. Early Intervention System entries
1. UCPD’s Standards and Strategic Development Bureau Commander shall be responsible for establishing and administering the EIS and generating reports specified in this policy or as otherwise directed by the Police Chief.
2. First-line supervisors shall be responsible for the initial entry of the following incidents into the EIS (Guardian Tracking):
   a. Attendance Issues (Absence without Leave, Failure to Appear, Improper Call Off, etc.)
   b. Corrective Action (Coaching **entered by issuing supervisor**)
   c. Discipline (Written Counseling, Written Reprimand, Suspension, etc. **entered by issuing supervisor**)

3. The Standards and Strategic Bureau Commander will be responsible for the initial and final disposition entry for the following incidents into the EIS (Guardian Tracking).
   a. Internal Investigations
   b. Citizen Complaints
   c. Uses of Force
   d. Administrative Reviews
   e. Vehicle Accident
   f. Vehicle Pursuits

C. Monthly review of EIS entries
   1. Officers’ performance, to include all EIS entries, will be reviewed by their supervisor as part of the monthly evaluation process.

D. EIS notifications
   1. The EIS will generate a notification whenever an officer or employee has exceeded the threshold established by this agency requiring supervisory review and intervention. For example, an officer who is the subject of a citizen complaint, a use of force and a corrective action in a six-month period would generate an EIS alert to their supervisor.
   2. EIS notification will provide a brief summary of complaints, uses-of-force incidents, and/or performance indicators and their respective dispositions where available. Notifications are intended to assist supervisory personnel in evaluating and guiding their subordinates. The analysis or review of EIS notifications alone shall not form the basis for disciplinary action.
   3. After supervisory review of the EIS entries that caused the notification, if there is no pattern requiring additional follow-up, the supervisor will document their findings in the EIS for their Bureau Commanders approval.
   4. If after supervisory review there is a pattern of potential risk incidents that requires additional follow-up, the supervisor shall review the EIS entries that caused the notification with the subject officer or employee and encourage him or her to provide insight into the specific incidents or any problems identified in the report.
   5. After the supervisor has met with the officer or employee, the Lieutenant will meet with the subject employee’s Bureau Commander to discuss the EIS entries that caused the notification and other relevant information to determine if corrective actions or further investigation are warranted. These actions may include but are not limited to the following:
      a. Implementation of a Performance Improvement Plan (PIP)
      b. Refer the employee or employee to an Employee Assistance Program;
Early Intervention System

c. Refer the employee to an agency-authorized mental health professional or other mental health care provider authorized by the department for fitness for duty evaluation;

d. Require that the employee participate in agency-authorized training, targeting personal or professional problems that the officer or employee may be facing (e.g., communications, cultural awareness, coping with stress, anger management); or

e. Conclude that the employee’s actions do not warrant immediate need for corrective action.

f. Conclude that the employee’s actions warrant further investigation that may result in discipline.

6. The employee’s Bureau Commander will document any recommendations and justification in the EIS to be forwarded through the SSDB, the Assistant Police Chief and the Police Chief for approval.

7. Once approved, the employee shall follow the plan to completion. The employee’s progress shall be monitored and formally reported as part of their monthly evaluation process. Indications of employee compliance or non-compliance, to include evidence on completion of the agreed upon plan should be included in the EIS for future reference.

E. Analysis of EIS

1. On a semiannual basis (January and July), the SSDB Commander or designee will conduct an analysis of the EIS to ensure it is functioning properly and being used in a consistent manner.

2. The analysis will include a review of the potential at risk incident data and information for the period as a whole and compare it to historical norms of all agency personnel functioning in the same or similar assignments. Norms will be updated on an ongoing basis for each behavioral or performance indicator.

3. The analysis will also include all completed administrative reviews (Use of Firearm Reports, Use of CEW Reports, Pursuits, etc.) available for the analysis period.

4. Reports on individual officers based on deviations from those norms will be distributed to respective organizational supervisors for review and response as outlined above.

5. In addition, the analysis will be used to identify any training needs and to evaluate if the thresholds established by this agency are set correctly.

6. The SSDB Commander will submit the results of the analysis and any recommendations on an Internal Correspondence Memo, Form-5, through the chain of command for review and approval by the Police Chief, prior to implementation or any recommendations.

References
UCPD Policy 3.1.100 Performance Evaluation
UCPD Policy 4.2.100 Internal Investigations and Complaints
UCPD Policy 4.3.100 Performance Rewards