

PROBATION DEPARTMENT DIRECTIVE

No.: 1539

Issued: 09/18/2025

Post Until: 10/18/2025

SUBJECT: FORCE INTERVENTION RESPONSE SUPPORT TEAM (FIRST)

PURPOSE

The purpose of this directive is to define the role and responsibilities of the independent review process for incidents involving the use of force.

POLICY

It is the policy of the Department to ensure that its peace officers' authority conforms with federal, state, and other applicable laws and regulations. Officers may encounter threats in the course of their regular duties where de-escalation efforts prove ineffective and other risk management techniques must be exercised to regain control and overcome the threat. These circumstances expose staff and individuals in the community to heightened risks and therefore require close Departmental oversight to mitigate occurrences.

All use of force incidents are subject to a comprehensive review process that includes analysis and review of the use of force physical intervention packet, related video, and any other documentation available to help make a determination on whether or not the use of force was in compliance with department policy and the law.

PHYSICAL INTERVENTION REVIEWS

When a use of force incident occurs, an initial review is conducted by the Independent Force Review Team (IFRT). The IFRT is an independent unit that reports through a chain of command outside of the Juvenile facilities in which the use of force occurs.

As a secondary level of review, the Force Intervention Response Support Team (FIRST) was established as a critical component of the Probation Compliance Review Process for use-of-force incidents. Designed to provide independent oversight, FIRST enhances accountability within the Department by offering objective analysis and recommendations. Additionally, FIRST will assist facility managers by providing insights from historical use of force data, helping with daily operational decisions. The team plays a vital role in maintaining transparency and integrity throughout the review of use-of-force situations. This proactive support not only streamlines operations but also promotes the well-being of both youth and staff.

FIRST's secondary independent reviews and expert guidance will help support culture change to assist in reforming the Department by enhancing accountability through oversight. This will also help prevent erroneous allegations and address the potential causes of force incidents. All physical intervention reviews will be conducted utilizing an objectively reasonable standard as defined in the Physical Intervention Policy.

The FIRST Unit operates independently and is not directly affiliated with the Department's Internal Affairs Bureau. However, it may be subjected to the same executive management as the Internal Affairs Bureau and the IFRT.

FIRST OVERVIEW

All use of force incidents must be documented through the preparation of a Physical Intervention Packet (PIP). All PIPs are reviewed by the involved staff's chain of command and submitted to the IFRT, which is responsible for the initial use of force reviews within Juvenile Institutions. Once the IFRT completes its review by ensuring that the review is signed by the reviewer, approved by the Program Director, and closed in the Probation Case Management System (PCMS), it is evaluated for the FIRST criteria. If it meets the FIRST criteria, it shall be forwarded to the FIRST for a secondary independent review and analysis.

The FIRST shall provide an impartial evaluation of identified PIP's following the review conducted by the IFRT. The PIP shall be emailed/submitted by the IFRT to **"EDL-PROB FIRST TEAM"** within 21 days from the date of the incident.

All PIPs meeting the review criteria shall be comprehensively reviewed and objectively analyzed by the FIRST to determine the quality of the initial review, justification for force, compliance with applicable laws, adherence to policies and procedures, and corrective actions recommended.

The FIRST will review PIPs based on the following criteria:

- Twenty percent of use of force incidents that required a Preliminary Incident Notification (PIN).
- All use of force incidents referred to Internal Affairs that are not accepted for investigation.
- Use of force incidents in which a Senior Probation Director or above disagrees with the IFRT's initial independent review findings.
- Use of force incidents that are of high notoriety in nature as determined by the Chief Probation Officer, Deputy Director of IFRT, or other Executive Staff member.

FIRST RESPONSIBILITIES AND DUTIES

COMPREHENSIVE REVIEW OF PHYSICAL INTERVENTION PACKETS

As an independent review branch of the Department, the FIRST shall provide an impartial evaluation of PIP's meeting FIRST review criteria following the initial assessment and review of events by the IFRT and in accordance with the Physical Intervention Policy-Post Incident Review Process. The IFRT shall provide FIRST with the complete PIP, including all corresponding video footage, photographs, and other related materials, within 21-days from the date of the incident.

The FIRST shall review the PIP for the following:

- All related video footage, whenever video footage is available, to ensure an understanding of the context and sequence of events.
- The PIP documentation and/or IFRT analysis to assess the thoroughness and accuracy of the initial findings and identify any gaps and/or discrepancies.
- To ensure that all relevant witness statements and reports for the involved youth and staff were obtained.
- To ensure proper measures were taken to collect, secure, and preserve evidence documented in witness statements from both youth and staff, including photographs and/or video footage.
- To ensure that photographs and/or video footage align with observations/experiences documented in Physical Intervention Review's (PIR)/Supplemental-PIR's, youth statements, and Child Safety Assessments (CSA).
- To ensure the appropriate paperwork was completed if staff injuries occurred.
- To ensure timely contacts, referrals, and/or PINs were completed for incidents, actions, and events beyond the normal scope of routine operations.
- To ensure that appropriate and thorough recommendations were made for incidents, actions, and events, beyond routine operations, highlighting potential policy violations, excessive or unjustifiable force, or the need for training.
- Recommend corrective actions to the respective facility, and that the applicable proof of practice was submitted by the facility.

COMMUNICATION WITH JUVENILE INSTITUTIONS REGARDING PIPS

Once the FIRST Unit completes an independent review and assessment of the PIP, the Juvenile Institution shall be provided the *FIRST Physical Intervention Review Summary Form* and receive email confirmation that the PIP either had:

- No Significant Findings/Deficiencies – the PIP meets the criteria identified in the respective policies and applicable state laws.
- Deficiencies/Non-Compliance Issues Noted – the independent review discovered areas in the PIP that the operation needs to address/follow up.

The *FIRST Physical Intervention Review Summary Form* will detail findings for all PIP's accepted by FIRST. In addition, FIRST shall make recommendations for corrective action to Juvenile Institutions to be completed in accordance with Departmental policies and procedures. The FIRST will discuss their findings with the IFRT. The Juvenile Institutions will be required

to address all corrective actions identified and submit proof of practice to the FIRST team to ensure compliance.

TECHNICAL CONSULTATIONS FOLLOWING CRITICAL INCIDENTS

The FIRST is intended to be a body of subject matter experts in the analysis of de-escalation, physical intervention, and use of force processes. Following critical incidents and other incidents, or anytime during the business process, the FIRST may be contacted by a supervisor and director for technical consultation, guidance, and coaching when needed to help strengthen the Juvenile Institutions' plan for corrective action, preparation of PIPs, and other related processes or training.

FIRST's technical consultation and coaching help strengthen the facility's ability to prepare and complete the PIP and positively impact the process's efficiency. This process does not provide Juvenile Institutions grounds for late submissions of the PIP to the IFRT or FIRST. Additionally, FIRST consultations do not replace the facilities' duties and responsibilities for submitting the package to the IFRT for an initial review.

To maintain objective post-incident reviews, FIRST shall not complete the PIP on behalf of the facility. This will ensure FIRST's independent judgment is not jeopardized by competing interests which make it difficult to fulfil their professional duties without bias and may undermine the credibility of FIRST and/or Department; particularly due to the controversial nature of force/physical intervention incidents.

Thus, FIRST's function is to consult, guide, and coach the operation and recommend targeted training in facilitating a robust after-incident risk analysis to determine whether de-escalation and risk management techniques were used effectively and/or areas defined in existing policies and procedures may require enhancement to address the root causes of an event and prevent the incident from reoccurring.

To summarize, the technical consultation provided by the FIRST will not replace and/or impact the post-incident independent review conducted by the IFRT or FIRST and it is not intended for FIRST to complete PIPs on behalf of the facility, nor will it justify the untimely submission of the PIP to the IFRT or FIRST.

JUVENILE INSTITUTIONS' RESPONSIBILITIES FOR SUBMITTING PIP

Each facility operation shall be responsible for monitoring its daily incidents and ensuring timely preparation and submission of the PIP to the IFRT for initial review. Upon completion of the initial review, the IFRT will forward cases meeting FIRST criteria to the FIRST team for a secondary review.

TRACKING AND MONITORING TRENDS

Quantitative data will be collected from use-of-force incidents to track and monitor trends and inform ongoing improvement efforts. The FIRST will engage in the following activities to encourage the use of techniques and mitigate/prevent/reduce reliance on force/physical intervention to resolve behavioral issues:

- Produce a monthly data-driven report detailing use-of-force incidents, highlighting key trends, and areas of concern.
- Produce and distribute a monthly report identifying the number of cases received and reviewed by FIRST.
- Identify resource gaps that contribute to use of force incidents and recommend the revision and/or development of policies and procedures.
- Recommend changes to training programs based on trend analysis and incident review findings.

PARTICIPATION IN REVIEW COMMITTEES AND MEETINGS

The FIRST may recommend that a critical incident be reviewed by the Critical Incident Review Committee (CIRC) and may participate in the following committees upon request:

- Critical Incident Review Committee (CIRC)
- Juvenile Institutions Review Committees/Facility-Level Critical Incident Review Committee (F-CIRC)

The policies will be located on Prob-Net (Probation Manuals- [POLICIES, PROCEDURES AND MANUALS \(sharepoint.com\)](#) –Force Intervention Response Support Team (FIRST)). Questions or concerns regarding this Directive shall be directed to the immediate supervisor.



Guillermo Viera Rosa
Chief Probation Officer

09/18/2025

Date