

East Haven Police Department 	Type of Directive: Policies & Procedures	No. 207.6
	Subject/Title: Early Intervention System (EIS)	Issue Date: May 27, 2025
		Effective Date: June 13, 2025
	Issuing Authority: Honorable Board of Police Commissioners	Review Date: Annually
References/Attachments: ¹ Kevin M. Gilmartin, PhD, Emotional Survival for Law Enforcement Officers, E-S Press (2021).	Rescinds: 207.5	Amends: N/A

I. PURPOSE

- A. The purpose of this directive is to set forth the policies and procedures of the East Haven Police Department (EHPD) regarding the Early Intervention System (EIS). The EIS supports the effective supervision and management of personnel including the identification of and response to potentially problematic behaviors as early as possible.
- B. The Department shall regularly use EIS data to promote ethical and professional police practices; to manage risk and liability; and to evaluate the performance of officers and employees across all ranks, units and shifts.

II. POLICY

- A. It is the policy of the Department to intervene as rapidly as feasible to address problematic behavior to manage risk and liability.

III. BACKGROUND STATEMENT

- A. We owe our employees our best effort to ensure that they are prepared to manage the complexities of policing. Research shows that police work exerts particular physiological, emotional and psychological strain on practitioners. The Early Intervention System (EIS) is the Department's program for identifying employees whose conduct indicates emerging problems affecting the quality of their work performance.

IV. GENERAL GUIDELINES AND CONSIDERATIONS

- A. The Department shall establish a database that captures all the information on which the EIS is based.
- B. The East Haven Police Department acknowledges its commitment to recognizing behaviors that may indicate employees are having problems managing the strains associated with law enforcement responsibilities and/or duties. The EIS Program shall be utilized to provide all assistance feasible to help employees address his/her problems and lead happy, productive lives.
- C. A comprehensive EIS is an essential component of good discipline in a well-managed law enforcement agency. The early identification of potential employees with problems and a menu of remedial actions can increase agency accountability and offer employees a better opportunity to meet the agency's values and mission statement and to live a healthier life.
- D. EIS is a problem-oriented approach to employee performance. The problem orientation enables management to recognize behavior patterns from among discrete incidents over a prescribed period of time. EIS provides a way for the Department to provide non-disciplinary direction and training before the employee becomes a liability to citizens, the Department, and himself/herself. Through the EIS, the Department will tailor assistance strategies (e.g. counseling and training) for the specific issues affecting the employee.
- E. Intervention will include counseling, retraining and psychological evaluation if warranted. It is not intended as the only way for an employee to address his/her problems, but rather as a tool to help supervisors and commanding officers determine if job stress or performance problems exist. The benefits of early intervention include helping employees with problems or lower skill levels, controlling complaints and increasing public confidence, getting supervisors more involved with employee development, identifying training needs and supporting termination of officers who cannot be remediated.
- F. The EIS can be an effective tool for first-line supervisors. The program provides them an expanded role in employee development, as the lines of communications are opened, as they are made part of the intervention strategy.
- G. Intervention is not disciplinary, and shall not be used instead of disciplinary action, which is a separate process from EIS. However, an EIS action does not preclude the investigation of an incident(s) and any discipline that may result.

V. PROCEDURES

- A. Definitions
 - 1. EIS Officer: Professional Standards Officer/Internal Affairs Officer (IAO) responsible for monitoring EIS data.
 - 2. EIS Review: A systematic review of defined indicator criteria to determine if an officer may require assistance or support.

3. EIS Trigger: Occurs when a threshold for a specific criterion is met, prompting an alert in the EIS System.
4. Indicator Criteria: An event or incident that is used as a marker or indicator that may trigger an intervention review.
5. Intervention Strategies: A series of actions or steps designed to assist the employee in a positive and supportive way.

B. This table defines the criteria that will initiate an EIS Review. The full review will include the criteria listed within this policy.

Criterion	Threshold Initiator of EIS Review
Arrests for Assaults on an Officer	Two Within a 60 Day Period
Arrests for Hindering Prosecution	Two Within a 60 Day Period
Arrests for Interfering with an Officer	Two Within a 60 Day Period
Chemical Munitions Deployed	Two Within a 12 Month Period
Choke Hold	One Use on a Person
Civil Lawsuits	Two Within a 12 Month Period
Civilian Complaints	Three Within a 90 Day Period
Deadly Force/Firearm	One Use on a Person
Electronic Defense Weapon Use	Two Within a 60 Day Period
Firearm-No Discharge	Two Within a 60 Day Period
Impact Weapon/Baton	Two Within a 60 Day Period
K-9 Use of Force	Two Within a 12 Month Period
Less Lethal Projectile	Two within a 12 Month Period

Motor Vehicle Pursuits	Two Within a 30 Day Period
OC Spray	Two Within a 60 Day Period
Physical Force Use	Three Within a 30 Day Period
Recommendation for Commendations	Two Within a 12 Month Period
Rules and Regulations	Two Within a 60 Day Period
Sick Time Use	Eight Occurrences Within a 12 Month Period
Traffic Accidents	Two Within a 12 Month Period

C. Additional Considerations

1. The IAO shall conduct a 12-month review of the identified employees' conduct in the areas cited within this policy to consider whether or not an anomaly in the listed parameters represents a longer-term pattern that could affect job performance.
2. The IAO shall review and make a written report annually to the Chief of Police on the usefulness of the criteria listed within this policy for supporting the purpose and policies of the EIS.

D. Intervention Protocol

1. EIS Preliminary Review
 - a. The Early Intervention System and Program has been established to provide an objective, systematic review of defined intervention criteria. It is designed to identify certain behavior indicators that may otherwise be insignificant when examined individually and, in so doing, allows the Department to support and assist the employee in addressing identified behavior patterns.
 - b. After receiving an EIS trigger for an employee, the IAO shall conduct a review of the identified employee's triggers from the preceding twelve (12) months. This review aims to develop a comprehensive understanding of the employee's behavior, with the objective of assessing whether a longer-term pattern exists that might impact the employee's job performance.
 - 1) If, after reviewing these triggers, the IAO determines no such pattern exists, it shall be documented by the IAO in the Department Review (DR) and no further action is required.
 - 2) If, after reviewing these triggers, the IAO determines a pattern exists that might impact the employee's job performance, the employee's immediate supervisor as well as the Division's Head shall be notified of the findings. Any patterns identified by the IAO shall be documented in the DR reporting

module within seventy-two (72) hours.

- c. After being notified by the IAO, the officer's immediate supervisor and Division's Head shall conduct a further analysis of any long-term pattern which has been identified. The employee and his/her supervisor shall meet to review and discuss the initiating criteria and any other relevant circumstances. At the meeting, the supervisor will:
 - 1) Explain the purpose and process of an EIS Review.
 - 2) Discuss the factors leading to the review.
 - 3) Attempt to identify any causes that may have led to the review.
- d. In order to obtain a more comprehensive view of an employee's situation, the complete EIS review may include, but is not limited to, a review and discussion of the following:
 - 1) Assignments during and immediately prior to the identified period (the period of time during which the criteria that triggered the review occurred).
 - 2) Any performance evaluations during that period, and/or interviews with present and prior supervisors.
 - 3) Comparative data analysis, including peer group, shift and unit analysis, to identify patterns of activity by individual officers and/or groups of officers.
 - 4) Commendations, letters of appreciation, and awards.
 - 5) All complaints and findings.
 - 6) Civil lawsuits or tort claims against an employee.
 - 7) All loss or theft of EHPD property or equipment in the custody of the employee, including currency, firearms, force instruments, and identification cards.
 - 8) Any disciplinary or other corrective action taken against the employee.
 - 9) On-duty vehicle collisions and off-duty vehicle collisions if operating a Department vehicle.
 - 10) Training history, including whether the employee has completed the required annual in-service training.
 - 11) Use of Force.
 - 12) Absenteeism and other leave usage.
 - 13) Number of arrests for obstructing, resisting arrest/interfering with police, or

assault on a police officer.

- 14) Any other information that may prove helpful in the overall evaluation.
 - e. The supervisor shall prepare an EIS Review Report in the DR reporting module. This report shall document the initial meeting with the employee, summarize the reviewed information, and any recommendations and/or actions taken by the supervisor. If the supervisor determines the employee requires no further support and/or assistance, they may recommend that no further action is necessary.
 - f. The DR shall be completed by the assigned supervisor within thirty days of notification by the IAO and submitted to the Division's Head for review and approval.
 - g. The Division's Head shall conduct a review and analysis of the EIS Review Report and make a determination on whether or not an employee needs additional support and/or assistance. If the Division's Head determines additional support and/or assistance is required, he/she shall document the findings along with any additional recommendations in the DR reporting module. These recommendations shall be submitted to the Deputy Chief of Police for review and approval.
2. Intervention Process
 - a. Employees who are found to need support and/or assistance shall be required to participate in all discussions and activities approved by the Chief and/or the Deputy Chief of Police.
 - b. The Department shall consider an array of support and/or assistance options to facilitate an effective response to identified problems. Support and/or assistance may take the form of counseling or training, or of other supervised, monitored, and documented action plans and strategies designed to modify activity. All actions taken will be documented in writing and entered into the DR reporting module. Should it be determined support and/or assistance is needed, strategies may include, but are not limited to:
 - 1) Review of related Departmental Policies and Procedures.
 - 2) Coaching (a form of non-disciplinary counseling, by the employee's supervisor or other organizational resource).
 - 3) Career Development Activities, including training (i.e.: individual training, complaint avoidance, verbal de-escalation, defensive tactics, cultural diversity, human behavior, stress management, conflict management) and potential assignment options.
 - 4) Remedial training.
 - 5) Referral to identified counseling or therapy program (i.e.: Employee Assistance Program, Peer Support, etc.).

c. The employee's supervisor shall monitor the status of any support and/or assistance strategy taken until it is completed. The supervisor shall complete a written report in the DR reporting module documenting how well the officer responded to the support and/or assistance strategy implemented. As part of his/her general supervisory duties, the supervisor will continue to monitor the officer's performance. If the employee's supervisor has any further concerns or believes additional support and/or assistance is needed he/she shall immediately notify the Division's Head and complete a written report in the DR reporting Module.

F. System Integrity

1. The Department shall ensure that the EIS is free of erroneous information.
2. If an employee disagrees with information contained in his or her EIS report, the information in question shall be brought to the attention of the employee's supervisor. The supervisor may request that information be changed or removed. The request for change must be made in writing by the employee's immediate supervisor and presented to the IAO.
3. The IAO shall review the information submitted and forward the request to the Deputy Chief of Police for consideration. If the Deputy Chief of Police determines any changes to the report are necessary, the IAO will make the approved amendments. Any amendments made shall be documented in the DR reporting module.

G. Access to Early Intervention System & Data

1. Upon request, employees shall be given an opportunity to review his/her EIS Review Report(s) on file.
2. The IAO shall ensure monitored and secure access to the EIS to ensure the integrity, proper use, and appropriate confidentiality of the data.
3. Users of EIS data shall be strictly held accountable for the information's privacy and confidentiality. Inappropriate use shall result in discipline.

H. Retention of Records

1. Records associated with EIS shall be maintained by the Department in accordance with applicable retention laws.