

OIR Use of Force Review

UOF Review 12-21-22 JH Unit M



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Summary of Facts

On December 21, 2022, at approximately 5:05 p.m., Deputy Juvenile Correctional Officer (DJCO) 1 was supervising a group of youths during dinner time in Unit M at Juvenile Hall.¹ Y1 and Y2 were seated at desks near each other. DJCO 1 was seated behind the staff desk. DJCO 1 observed Y1 get up from her desk and walk towards Y2. DJCO 1 directed Y1 to sit down, but Y1 ignored her directive and appeared to push Y2 in her seat. Y2 then got up. DJCO 1 yelled at both Y1 and Y2 to “sit down” as they began to slap each other. DJCO 1 continued to yell out “Sit Down. Stop! Get down!” as it appeared that the contact was escalating. DJCO 2 heard DJCO 1 yelling for the youths to “sit down” and “stop, and he responded from the unit supervisor’s office. DJCO 2 could see that Y1 and Y2 were standing and facing each other with their hands raised in a fighting position. Both youths disregarded DJCO 1’s commands and began to punch each other in the upper body with closed fists. DJCO 1 then called Code 2.²

DJCO 2 directed the youths to “stop fighting” and then told the uninvolved youths to get down. Y1 and Y2 continued to strike each other in the head and face as they continued to move towards the back wall. “Due to the youths’ being surrounded by tables, desks, and other youth, [DJCO 2] determined that it was not safe to physically restrain either youth where they stood.” DJCO 2 again directed the youths to “stop fighting,” but they continued to strike each other. DJCO 2 then removed his Oleoresin Capsicum (OC) spray canister from its holster and shouted, “OC clear.” DJCO 2 then “waited 3 seconds to give the fighters an opportunity to comply while [he] repositioned [him]self to a better angle.” Both youths continued to fight and DJCO 2 deployed a single three second burst, first aimed at Y2’s forehead and then at Y1’s forehead. Both youths then dropped to the floor in compliance.

DJCO 3 secured Y2 in handcuffs and DJCO 2 secured Y1 in handcuffs. Additional staff responded and directed all uninvolved youths to return to their rooms. Supervising Juvenile Correctional Officer (SJCO) 1, and SJCO 2 arrived on scene and directed staff to escort Y1 and Y2 to the showers for decontamination. Y1 was escorted to the Unit O showers by DJCO 5 and DJCO 6 for decontamination. Y2 was escorted to the Unit M showers for decontamination by DJCO 3 and DJCO 4. Y1 and Y2 began decontamination within approximately three minutes of the OC deployment. Both youths were provided with clean clothing, and their contaminated clothing was bagged and labeled accordingly.

Lawful Requirements for Use of OC

In determining whether a particular use of force was appropriate, courts analyze the use of force “under the Fourth Amendment’s prohibition against unreasonable seizures using the framework articulated in *Graham v. Connor*.”³ The reasonableness of a seizure turns on whether the use of force was “objectively reasonable in light of the facts and circumstances confronting [the user of force], without regard to their underlying intent or motivation.”⁴

¹ All information regarding the incident is taken from DJCO reports and video provided to the OIR. All information regarding statements made or commands given were taken from reports because the video contains no audio.

² A Code 2 indicates that there is a fight in progress.

³ *Young v. County of Los Angeles* (9th Cir. 2011) 655 F.3d 1156.

⁴ *Graham v. Connor* (1989) 490 U.S. 386, 397; *Blankenhorn v. City of Orange* (9th Cir. 2007) 485 F.3d 463, 477.

Reasonableness is determined by balancing "the nature and quality of the intrusion on the individual's Fourth Amendment interests against the countervailing governmental interests at stake."⁵

There are three steps in conducting the balancing required by *Graham*. The first step is to assess the "the quantum of force used."⁶ The second step is to measure "the governmental interests at stake by evaluating a range of factors."⁷ Finally, the third step is to balance the quantum of force used on the individual against "the government's need for that intrusion to determine whether it was constitutionally reasonable."⁸

Quantum of Force

Assessing the quantum of force used requires analyzing the nature and quality of the intrusion on the individual's Fourth Amendment interests, which, in turn, requires the fact finder to evaluate both the type of force inflicted, and the amount of force used.⁹

Type of Force Used

In this incident, the force used was Oleoresin Capsicum (OC), commonly known as pepper spray. OC is an oily organic resin derived from the fruit of plants in the Capsicum genus, such as chili peppers.

The Ninth Circuit has clearly held that pepper spray is a form of "force capable of inflicting significant pain and causing serious injury."¹⁰ "Pepper spray 'is *designed* to cause intense pain,' and inflicts 'a burning sensation that causes mucus to come out of the nose, an involuntary closing of the eyes, a gagging reflex, and temporary paralysis of the larynx,' as well as 'disorientation, anxiety, and panic.'"¹¹ As such, pepper spray is regarded as "intermediate force" that, "while less severe than deadly force, nonetheless present[s] a significant intrusion upon an individual's liberty interests."¹²

Recommendation

Update PMI 3-1-056 to specifically state that OC spray is classified as an intermediate level of force.

Amount of Force Used

The amount of "intermediate force" (OC) used in this case was moderate. There was a single deployment of OC. The reports and video reflect that the deployment was three seconds in length and directed in succession at each youth's forehead for approximately 1 second. The deployment of OC contacted Y2's forehead for one second and DJCO 2 continued to deploy the OC spray and made contact to Y1's forehead for one second. The OC was deployed from about six feet away. The deployment of OC occurred while Y1 and Y2 were mutually assaulting each other with closed fists strikes to the head and torso.

⁵ *Young v. County of Los Angeles* (9th Cir. 2011) 655 F.3d 1156.

⁶ *Davis v. City of Las Vegas* (9th Cir. 2007) 478 F.3d 1048, 1054.

⁷ *Davis v. City of Las Vegas* (9th Cir. 2007) 478 F.3d 1048, 1054.

⁸ *Young v. County of Los Angeles* (9th Cir. 2011) 655 F.3d 1156.

⁹ *Miller v. Clark County* (9th Cir. 2003) 340 F.3d 959, 964.

¹⁰ *Young v. County of Los Angeles* (9th Cir. 2011) 655 F.3d 1156.

¹¹ *Young v. County of Los Angeles* (9th Cir. 2011) 655 F.3d 1156.

¹² *Young v. County of Los Angeles* (9th Cir. 2011) 655 F.3d 1156.

Some courts have also held that the failure to act by not properly decontaminating a person exposed to OC can rise to the level of a constitutional violation.¹³ Such is not the case here. Staff ensured that the length of time that the youths felt the effects of the OC was limited.

As soon as the youths were secured, they were escorted to the showers to decontaminate. Y1 was escorted to the Unit O showers and Y2 was escorted to the Unit M showers. DJCO 2's reports indicate that both youths began decontamination within three minutes of the OC deployment. A review of the video for this incident confirms that both youths were being walked towards the showers before the three-minute mark of the video.

Governmental Interest

Intermediate force is a "significant level of force that must be justified by the governmental interest involved."¹⁴ In evaluating the government's interest in the use of force, courts look to: "(1) the severity of the crime at issue, (2) whether the suspect posed an immediate threat to the safety of the officers or others, and (3) whether the suspect was actively resisting arrest or attempting to evade arrest by flight."¹⁵

Severity of the Crime at Issue

The crimes at issue in this incident were violent crimes of assault and battery. Under California law, assault and battery are misdemeanor offenses.¹⁶ However, battery involving the infliction of serious bodily injury and assault by means of force likely to produce great bodily injury are both felony offenses.¹⁷ The felony battery charge focuses on the actual injury inflicted, while the felony assault charge focuses on the force used and not whether the force produced great bodily injury. "The crime of assault by means of force likely to produce great bodily injury is completed before any injury is inflicted."¹⁸ "It is enough that the force used is likely to cause serious bodily injury. No injury is necessary."¹⁹ Courts have said that punching is "capable of inflicting significant pain and causing serious injury."²⁰

Here, the video and reports show that Y1 and Y2 were striking each other in the head and face when DJCO 2 deployed the OC. After the deployment, the youths went to the ground in a prone position. Considering that Y1 and Y2 were throwing continuous strikes at each other's heads, which could result in serious injury, the assaults by Y1 and Y2 should be considered severe.

Whether the Suspect Posed an Immediate Threat to the Safety of the Officers or Others

Courts have said that the most important element of the *Graham* factors is whether the suspect poses an immediate threat to the safety of the officers or others.²¹ Here, the reports and video make clear that Y1 and Y2 posed an immediate threat to each other. At the time that DJCO 1 deployed OC spray, Y1 and Y2 were continuously punching and striking each other in the upper torso and head. Despite DJCO 1

¹³ *Wilson v. Bucato* (E.D.Cal. Dec. 7, 2023, No. 1:23-cv-00023-HBK (PC)) 2023 U.S.Dist.LEXIS 218539.

¹⁴ *Bryan v. MacPherson* (9th Cir. 2010) 630 F. 3d 805, 826.

¹⁵ *Graham v. Connor* (1989) 490 U.S. 386 [109 S.Ct. 1865, 104 L.Ed.2d 443].

¹⁶ Pen. Code, §§ 240, 242, 243(a).

¹⁷ Pen. Code, §§ 242, 243(d), 245(a).

¹⁸ *People v. Hopkins* (1978) 78 Cal.App.3d 316 [142 Cal.Rptr. 572].

¹⁹ *People v. Hopkins* (1978) 78 Cal.App.3d 316 [142 Cal.Rptr. 572].

²⁰ *Reaza v. County of Riverside* (C.D.Cal. Oct. 26, 2022, No. 5:20-cv-01188-MEMF (SPx)) 2022 U.S.Dist.LEXIS 198653.

²¹ *Chew v. Gates* (9th Cir. 1994) 27 F.3d 1432.

and DJCO 2's efforts to stop the fight by directing the youths to "stop" and to "get down," they continued to strike each other. These facts establish that but-for DJCO 2's intervention, the mutual assault would have continued. Therefore, at the time of the OC deployment, the youths posed an immediate and ongoing threat to each other.

Whether the Suspect was Actively Resisting Arrest or Attempting to Evade Arrest by Flight

While the youths were not attempting to evade DJCO 1 or DJCO 2, both youths were clearly refusing to comply with the DJCOs' numerous commands to get them to submit to their authority. DJCO 1 directed Y1 to sit down, and she refused, and Y2 stood up as well. DJCO 1 then directed both youths to sit down, and they both ignored her directive. When Y1 and Y2 began to engage physically, DJCO 1 again directed them to both sit down. Neither youth complied with the directives and instead, continued their mutual assault. Upon hearing the commands, DJCO 2 responded and directed both youths to "stop fighting." Both youths continued to fight even after DJCO 2 commanded them to stop fighting on two occasions. It was only after each youth was targeted with OC spray that they submitted to the DJCOs' authority and laid down on the ground in the prone position.

Balancing the Force Used Against the Need for Such Force

Finally, in order to determine if force used was excessive, courts "balance the gravity of the intrusion on the individual against the government's need for that intrusion."²² Put another way, does the government's need for the force used, based on the severity of the crime, the threat to safety, and the resistance of the subject, outweigh the type and amount of force used?

The Ninth Circuit has said that the law is clearly established "that police officers employ excessive force in violation of the Fourth Amendment when they use pepper spray upon an individual who is engaged in the commission of a non-violent misdemeanor and who is disobeying a police officer's order but otherwise poses no threat to the officer or others."²³ That is not the situation that confronted the DJCOs in this incident.

As previously stated, the youths were engaged in, at a minimum, a violent misdemeanor, and potentially a violent felony, and they clearly disobeyed the DJCOs' order to get down and continued to fight. The most important distinction, however, is the fact that by continuing to fight, the youths clearly posed a threat to each other.

The youths involved in the fights were under the custody and care of the Probation Department. As such, the Probation Department had an obligation to protect them from harm. Prior to the deployment of OC, Y1 and Y2 posed immediate threats to each other. Additionally, the harm that could have occurred to either youth from strikes to the face and head justified the deployment of OC when the youths continued to fight even after being directed on several occasions, by two different DJCOs, to stop fighting and get down. Thus, the deployment of OC targeted at each youth for approximately one second was justified when considering each of the above factors.

²² *Espinosa v. City & County of San Francisco* (9th Cir. 2010) 598 F.3d 528.

²³ *Silva v. Chung* (9th Cir. 2018) 740 F.App'x 883.

Compliance with Department Procedure

State Law

The State of California has set forth requirements that a facility, which authorizes the use of chemical agents as a force option, must have in their policies and procedures.²⁴ Those requirements include that the policies mandate that chemical agents only be used when there is an imminent threat to the youth's safety or the safety of others and only when de-escalation efforts have been unsuccessful or are not reasonably possible;²⁵ that the policy outline the facility's approved methods and timelines for decontamination from chemical agents including that youth who have been exposed to chemical agents shall not be left unattended until that youth is fully decontaminated or is no longer suffering the effects of the chemical agent;²⁶ that the policy define the role, notification, and follow-up procedures required after a use of force incident involving chemical agents for medical, mental health staff and parents or legal guardians;²⁷ and that the policy provide for the documentation of each incident of use of chemical agents, including the reasons for which it was used, efforts to de-escalate prior to use, youth and staff involved, the date, time and location of use, decontamination procedures applied and identification of any injuries sustained as a result of such use.²⁸

Department Procedure

Imminent Threat and De-escalation

The Probation Department has two procedures that address the use of OC by DJCOs in the course and scope of their duties.²⁹ The OC procedure provides that OC spray may “only be used when there is an imminent threat to the youth’s safety and/or the safety of the officer or others and only when de-escalation efforts have been unsuccessful or are not reasonably possible.”³⁰ This verbiage is consistent with state law.

The reports and videos regarding this incident make clear that Y1 and Y2 posed an imminent threat to each other, as they were violently assaulting each other. DJCO 1 attempted to verbally de-escalate the situation before the youths physically engaged, by first directing Y1 to sit down, and then after Y2 stood up, by directing both youths to sit down. After the youths began to slap each other DJCO 1 again attempted to de-escalate by directing the youths to “stop” and to “get down.” Despite these commands, the youths continued their mutual assault. DJCO 2 then arrived to assist and attempted to de-escalate by directing both youths to “stop fighting” twice. Both youths failed to comply with DJCO 2’s directives and continued to fight. DJCO 1 and DJCO 2’s attempts to verbally de-escalate prior to the deployment of OC spray were unsuccessful.

²⁴ Cal. Code Regs., tit. 15, § 1357 – Use of Force.

²⁵ Cal. Code Regs., tit. 15, § 1357(b)(2).

²⁶ Cal. Code Regs., tit. 15, § 1357(b)(3).

²⁷ Cal. Code Regs., tit. 15, § 1357(b)(4).

²⁸ Cal. Code Regs., tit. 15, § 1357(b)(5).

²⁹ Procedure Manual Item 3-1-056 Oleoresin Capsicum (OC) Spray – Facilities;
Procedure Manual Item 3-1-015 Use of Force – Facilities.

³⁰ Procedure Manual Item 3-1-056 I(C) General Information.

Spray Duration

The OC Procedure limits the duration of bursts of OC spray to three ½ to 1-second bursts.³¹ DJCO 2 deployed a single three-second burst of OC Spray. He began with the burst directed at Y2, and then directed the burst at Y1. The duration of the spray is not consistent with the OC procedure, as the procedure directs a DJCO to “[p]ress actuator to fire at subjects face in ½ to 1 second bursts.”

Recommendation

Provide additional training reminding staff that pursuant to the OC procedure, OC bursts may be no more than ½ to 1 second in duration.

Decontamination

The Probation Department’s OC Procedure requires that “[f]or youth exposed to OC spray, through a direct spray or over spray, decontamination measures must be undertaken as soon as practical after a youth is subdued and restrained.”³² The OC Procedure further states that youth shall be placed, “fully clothed, into a shower, at a sink, or on the patio with the garden hose, allowing cold water to freely fall onto the youth until the youth no longer feels the effects of the OC spray.”³³

According to the reports, Y1 and Y2 came into direct contact with, and were affected by, the OC spray. As soon as the youths were secured, they were escorted to the showers to decontaminate. DJCO 2’s reports indicate that both youths began decontamination three minutes following the OC deployment. DJCO 5 and DJCO 6 escorted Y1 for decontamination, which began at 5:07 p.m. and ended at 5:23 p.m. While DJCO 5 and DJCO 6’s reports indicate that they escorted Y1, they do not indicate that they supervised her decontamination. DJCO 3 and DJCO 4 escorted Y2 for decontamination, which began at 5:07 p.m. and ended at 5:19 p.m. Similarly, while DJCO 3 and 4’s reports indicate that they escorted Y2, they do not indicate that they supervised her decontamination.

The OC Procedure also states that the youth will then remove contaminated clothing and be issued clean clothing. The contaminated clothing shall be placed in a marked plastic bag.³⁴ Both DJCO 5 and DJCO 6’s narratives indicates that “[Y1] was given clean clothing and the soiled clothing was placed in a labeled water-soluble bag.”

As it relates to Y2, DJCO 3’s narrative indicates that “[Y2] was given clean set of clothes and the contaminated clothing was sealed separately in a water soluble bag.” DJCO 4’s narrative also reported that Y2 “bagged all clothing in soluble bag.”

DJCO 2’s Use of Force reports for Y1 and Y2 also indicate “yes” to the statements “contaminants placed in water-soluble bag,” “bag labeled,” and “new clothing/linen issued.”

³¹ Procedure Manual Item 3-1-056 II (C)(4) Use of OC Spray.

³² Procedure Manual Item 3-1-056 II(F)(3) Decontamination/Aftercare Procedures. (The Department’s Use of Force Policy, Procedure Manual Item 3-1-015 VIII(E) Medical and Mental Health Considerations, has been renumbered and amended to include language that decontamination measures must be undertaken as soon as practical after a youth is subdued and restrained.)

³³ Procedure Manual Item 3-1-056 II(F)(4) Decontamination/Aftercare Procedures.

³⁴ Procedure Manual Item 3-1-056 II(F)(7) Decontamination/Aftercare Procedures.

Staff are also required to be with “the youth throughout the entire decontamination process.”³⁵ None of the reports specifically state that staff remained with the youths during the entire decontamination process. However, DJCO 5 and DJCO 6 both reported that decontamination for Y1 “ended at 17:23 at youth’s request.” This verbiage implies without specifically saying, that DJCO 5 and DJCO 6 were with Y1 throughout the entire decontamination process.

As it relates to Y2, DJCO 3’s narrative indicated that “[Y2] ended decontamination shower by choice.” This verbiage also implies, without specifically saying, that DJCO 3 was with Y1 throughout the entire decontamination process.

Although the written narratives by DJCO 3, DJCO 5, and DJCO 6 imply that someone was present for the youths to alert to the fact that they were voluntarily ending their decontamination, it remains unclear whether a staff member was continuously present with the youths throughout the decontamination process. A straightforward statement would be more helpful to the reader of their reports.

Recommendation

Update the portion of the Use of Force/Restraint SIR form relating to Pepper Spray and Decontamination to add an entry field that requires the report writer to specifically indicate which DJCO(s) stayed with each youth during the entire decontamination process.

Notification and Procedures Required After Use of Force Incidents

The OC Procedure requires that a DJCO who discharges an OC canister notify his or her supervisor as soon as possible.³⁶ The OC Procedure also makes clear that “[t]he staff member who sprayed the individual is responsible for advising medical personnel or others of the decontamination procedures.”³⁷ The responsibility for contacting the youth’s parent or legal guardian is assigned to the SJCO/Duty Officer or designee.³⁸ Lastly, while the OC Procedure requires that the youth must be referred to Mental Health staff immediately following decontamination, it does not specifically identify whose responsibility it is to ensure that this section of the procedure is followed.³⁹

The main SIR, as well as several supplemental reports indicate that three SJCOs were on scene and provided direction to staff regarding the escorting of youths for decontamination. DJCO 3’s narrative indicated that SJCO 2 supervised Y2’s escort.

As it relates to Y1, the main SIR indicates that SJCO 3 directed and supervised Y1’s escort. DJCO 6’s narrative also reported that SJCO 3 directed Y1’s escort.

The main SIR and Use of Force reports also indicate that staff notified the mother of Y2 by phone call at approximately 5:38 p.m. Y1’s probation officer was notified, via voicemail, at approximately 5:44 p.m. because she did not have a listed legal guardian.

³⁵ Procedure Manual Item 3-1-056 II(F)(10) Decontamination/Aftercare Procedures.

³⁶ Procedure Manual Item 3-1-056 II(E)(1) Notification and Documentation.

³⁷ Procedure Manual Item 3-1-056 II(F)(13) Decontamination/Aftercare Procedures.

³⁸ Procedure Manual Item 3-1-056 II(F)(18) Decontamination/Aftercare Procedures.

³⁹ Procedure Manual Item 3-1-056 II(F)(17) Decontamination/Aftercare Procedures.

The main SIR and Use of Force reports indicate that the medical unit was notified of the incident within approximately 15 minutes of the deployment of OC. Both youths were seen by medical staff approximately 25 minutes after the start of the incident and cleared of any injuries.

Finally, the main SIR indicates that the Clinical Evaluation Guidance Unit (CEGU) was notified of the incident and that both youths were evaluated that same evening.

Documentation

Department procedure related to use of force provides that any DJCO involved in, or a witness to, a use of force, which includes the use of Chemical - Oleoresin capsicum (OC) spray, shall write and submit a Special Incident Report (SIR).⁴⁰ Further, the procedure requires that an SIR and Use of Force Report must include a clear and factual justification for the use of OC, efforts to de-escalate prior to use and reasons why de-escalation was not reasonably possible, the youth and staff involved, the date, time and location of use, decontamination procedures applied, and identification of any injuries and medical treatment.⁴¹

DJCO 1 completed the main SIR for this incident and five other DJCOs prepared supplemental incident reports. The main SIR identified the youths involved as well as the actions taken by DJCO 1 and DJCO 2 to attempt to verbally de-escalate prior to the use of force. The report also clearly sets forth the activities that occurred after the uses of force except for whether staff members remained with the youths throughout the decontamination process.

In addition to his SIR, DJCO 2 also prepared a Use of Force report for each youth to document the intentional deployment of OC directed at Y1 and Y2.

Finally, the OIR observed some inconsistencies between DJCO reports. For example, reports by DJCO 1, DJCO 2, DJCO 5, and DJCO 6 indicate that CEGU was notified at approximately 5:15 p.m. However, DJCO 3 and DJCO 4's SIR and Use of Force reports indicate that CEGU was notified at approximately 5:35 p.m. As a result, it is not clear when CEGU was notified.

Recommendation

Provide additional training reminding supervisors of the importance of making sure that DJCOs' reports are accurate and complete. Supervisors should also be reminded of their role in making sure that inconsistencies in, or between, reports are addressed before reports are approved.

Conclusion

A review of the SIRs and Use of Force reports established that the use of force (OC spray) by DJCO 2 was within law, however it did not comply with OC procedure which requires OC spray deployments to be in ½ to 1 second bursts. The main SIR and video show that had DJCO 2 not deployed force, Y1 and Y2 would have continued their mutual assault, resulting in potentially serious injuries. When Y1 and Y2 started their mutual assault, DJCO 1 and DJCO 2 used verbal commands to attempt to de-escalate the situation. DJCO 2 deployed OC spray only after his attempts to gain compliance failed.

⁴⁰ Procedure Manual Item 3-1-015 VIII(F) DJCO Responsibilities

⁴¹ Procedure Manual Item 3-1-056 II(E)(2) Notification and Documentation.

Recommendations

1. Update PMI 3-1-056 to specifically state that OC spray is classified as an intermediate level of force.
2. Provide additional training reminding staff that pursuant to the OC procedure, OC bursts may be no more than ½ to 1 second in duration.
3. Update the portion of the Use of Force/Restraint SIR form relating to Pepper Spray and Decontamination to add an entry field that requires the report writer to specifically indicate which DJCO(s) stayed with each youth during the entire decontamination process.
4. Provide additional training reminding supervisors of the importance of making sure that DJCOs' reports are accurate and complete. Supervisors should also be reminded of their role in making sure that inconsistencies in, or between, reports are addressed before reports are approved.