

# OIR Use of Force Review

*UOF Review 4-25-22 YGC Room M4*



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## Summary of Facts

On April 25, 2022, at approximately 11:48 a.m., Deputy Juvenile Correctional Officer (DJCO) 1 heard “[s]taff assistance needed in M4” broadcast over the school radio and responded to classroom M4.<sup>1</sup> When DJCO 1 arrived at the room she noticed that the lights were off, and the teacher was standing behind his desk located by the front door. DJCO 1 entered the classroom and saw Y1 and Y2 at the back of the classroom fighting on the floor. All uninvolved youths were already in the duck-and-cover position.

DJCO 1 approached Y1 and Y2 and directed both youths to “[s]top, get down, get down!” As DJCO 2 approached the classroom doorway she heard DJCO 1’s directives and called a Code 2 over the radio for assistance.<sup>2</sup> DJCO 1 again directed the youths to “[s]top” and yelled “OC Clear Stop! I am going to deploy, OC Clear.” Both youths continued to fight, pulling each other’s hair and punching each other with closed fists. One youth was on top of the other youth, punching continuously, as the other youth was pulling on her hair. DJCO 1 again yelled, “OC clear,” stepped back four to five feet, and deployed a half-second burst of Oleoresin Capsicum (OC) spray aimed at one youth’s forehead. Due to their movement, the OC contacted the left side of the face of one of the youths. Following the OC deployment both youths continued to fight. DJCO 1 again yelled “OC clear” and deployed another half-second burst aimed at the other youth’s forehead. The OC contacted the right side of the youth’s face. Both youths stopped fighting and complied with verbal commands. Y1 began to stand up and DJCO 2 directed her to get down on the ground. Y1 complied and lied down on the floor.

DJCO 2 directed Y1 to place her hands behind her back. Y1 complied but complained of pain in her shoulder. DJCO 2 attempted to secure Y1 in handcuffs but was affected by the OC spray and was unable to do so due to coughing and difficulty catching her breath. DJCO 3 arrived and secured Y1 in handcuffs and escorted Y1 out of the classroom with the assistance of DJCO 4. DJCO 5 and DJCO 6 arrived and secured Y2 in handcuffs.

Once Y1 was outside of the classroom, DJCO 2 and DJCO 7 escorted her to Unit 300 for decontamination. Y1 began decontamination at 12:02 p.m. DJCO 5 and DJCO 8 escorted Y2 to the decontamination station behind the gym. Y2 began decontamination at 11:52 a.m.

## 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*.”<sup>3</sup> 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.”<sup>4</sup>

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<sup>1</sup> All information regarding the incident is taken from DJCO reports as no video footage of the incident exists. Video surveillance is not available in the classrooms at the Youth Guidance Center.

<sup>2</sup> A Code 2 indicates that there is a fight in progress.

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

<sup>4</sup> *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."<sup>5</sup>

There are three steps in conducting the balancing required by *Graham*. The first step is to assess the "the quantum of force used."<sup>6</sup> The second step is to measure "the governmental interests at stake by evaluating a range of factors."<sup>7</sup> 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."<sup>8</sup>

### 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.<sup>9</sup>

### 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."<sup>10</sup> "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.'"<sup>11</sup> 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."<sup>12</sup>

### 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 spray) used in this case was minimal. Although there were two half-second deployments of OC deployed, each youth was sprayed only once. The reports indicate that both deployments of OC occurred while Y1 and Y2 were fighting. Both bursts of OC were aimed at the youths' foreheads. After the second deployment of OC, both youths stopped fighting and complied with verbal directives.

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.<sup>13</sup> 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

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

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

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

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

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

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

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

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

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

secured, Y1 was taken directly to the unit showers to begin the decontamination process. Y2 was taken to a decontamination station to begin decontamination. Y2 began decontamination within four minutes and Y1 began decontamination within approximately 14 minutes. Y1 needed assistance removing some of her apparel due to an injury that she sustained during the fight with Y2. As a result, it appears that despite being taken directly to the shower, Y1 did not actually enter the shower until approximately 12:02 p.m.

### Governmental Interest

Intermediate force is a “significant level of force that must be justified by the governmental interest involved.”<sup>14</sup> 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.”<sup>15</sup>

### 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.<sup>16</sup> 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.<sup>17</sup> 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.”<sup>18</sup> “It is enough that the force used is likely to cause serious bodily injury. No injury is necessary.”<sup>19</sup> Some courts have said that punching is “capable of inflicting significant pain and causing serious injury.”<sup>20</sup>

Here, the reports show that Y1 and Y2 were pulling each other’s hair and exchanging numerous closed fists punches when DJCO 1 deployed the OC spray the first time. The youths did not stop and were still fighting when DJCO 1 deployed the second burst of OC. As a result of the fight, Y1 sustained an injury and was transported to Anaheim Global Medical Center for evaluation and treatment. Based on these facts, the force used by the two youths were likely to, and probably did, cause serious bodily harm.

### 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.<sup>21</sup> Here, the reports make clear that Y1 and Y2 had punched each other numerous times and pulled each other’s hair. They clearly posed an immediate threat to each other as they threw closed-fist punches at each other. The reports also establish that even after given commands to “stop” and “[g]et down,” both youths continued to fight.

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

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

<sup>16</sup> Pen. Code, §§ 240, 242, 243(a).

<sup>17</sup> Pen. Code, §§ 242, 243(d), 245(a).

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

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

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

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

The fight continued even after one of the youths was sprayed with OC. These facts establish that at the time of the OC deployments, 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, both youths were clearly refusing to comply with her commands to “Stop, Get Down, Get Down” and submit to her authority. Instead, they continued to assault each other. DJCO 1 also yelled “Stop! O.C. Clear Stop! I am going to deploy, O.C. Clear.” However, the youths continued to disregard her commands. DJCO 1 also provided a warning prior to the deployment of OC, which did not deter the youths from continuing their assaultive behavior.

Ultimately, to place the combative youths into custody, the DJCOs had to do more than simply place passive youths into handcuffs. It took two OC sprays in order to get the youths to comply with verbal commands.

#### 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.”<sup>22</sup> 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.”<sup>23</sup> 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’ orders to get down and continued to fight after being sprayed. 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 fight 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 an immediate threat to each other. Additionally, the harm that could have occurred to either youth from closed-fist strikes justified the use of a single burst of OC when the youths failed to follow multiple commands to “stop” and “get down.” The second burst of OC was similarly justified, as one youth was on top of the other and punching her continuously while the other youth was pulling on the first youth’s hair. Thus, each deployment of OC was justified when considering each of the above factors.

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

<sup>23</sup> *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.<sup>24</sup> Those requirements include, in part, 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;<sup>25</sup> 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;<sup>26</sup> 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;<sup>27</sup> 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.<sup>28</sup>

### 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.<sup>29</sup> 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.”<sup>30</sup> This verbiage is consistent with state law.

The reports regarding this incident make clear that Y1 and Y2 were physically battering each other. DJCO 1 attempted to verbally de-escalate the situation by directing both youths to “stop, get down, get down.” DJCO 1 also warned the youths that she would deploy OC if they did not stop fighting. DJCO 1’s attempts to verbally de-escalate the situation were unsuccessful, as neither youth complied with her directives to stop. Instead, the youths continued to engage in mutually assaultive behaviors. Given that Y1 and Y2 were actively punching each other with closed fists, it was clear that they posed an imminent threat to each other when DJCO 1 deployed OC spray on both occasions.

#### 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

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<sup>24</sup> Cal. Code Regs., tit. 15, § 1357 – Use of Force.

<sup>25</sup> Cal. Code Regs., tit. 15, § 1357(b)(2).

<sup>26</sup> Cal. Code Regs., tit. 15, § 1357(b)(3).

<sup>27</sup> Cal. Code Regs., tit. 15, § 1357(b)(4).

<sup>28</sup> Cal. Code Regs., tit. 15, § 1357(b)(5).

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

<sup>30</sup> Procedure Manual Item 3-1-056 I(C) General Information.

youth is subdued and restrained.”<sup>31</sup> 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.”<sup>32</sup>

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, Y1 was escorted to the unit showers to decontaminate and Y2 was escorted first to the decontamination station in the gym to begin to decontaminate, then to the gym showers to finish decontamination. According to the reports, Y2 began decontamination within four minutes of the OC deployment, and Y1 began decontamination within 14 minutes of the OC deployment. The delay in Y1’s decontamination appears to have resulted from the fact that she required assistance removing clothing as a result of an injury that she sustained during the fight with Y2.

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.<sup>33</sup> According to DJCO 2’s Special Incident Report (SIR) narrative, Y1 “put on a nightgown and night shorts and sat in the day area next to the restroom. Her contaminated clothing was placed in a red bag for proper disposal.” DJCO 5’s report indicated that Y2 “was given new clothing and the contaminated clothing was bagged and labeled.”

Staff are also required to be with “the youth throughout the entire decontamination process.”<sup>34</sup> None of the reports specifically state that a particular DJCO stayed with the youths during the entire decontamination process. However, the main SIR states that Y2 “voluntarily ended decontamination.” This statement implies that someone was present for Y2 to alert to the fact that she was voluntarily ending her decontamination. Similarly, the report prepared by DJCO 2 indicates that Y1 “kept her undergarments on while in the shower and DJCO [9] and I stood close to her just in case she needed our assistance. She voluntarily ended decontamination at approximately 12:15 p.m.” This also implies that a staff member was continuously present with Y1 throughout the decontamination process.

### *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.

### *Notifications and Procedures 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.<sup>35</sup> 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.”<sup>36</sup> The responsibility for contacting the youth’s parent or legal guardian is assigned to the Supervising

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<sup>31</sup> 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.)

<sup>32</sup> Procedure Manual Item 3-1-056 II(F)(4) Decontamination/Aftercare Procedures.

<sup>33</sup> Procedure Manual Item 3-1-056 II(F)(7) Decontamination/Aftercare Procedures.

<sup>34</sup> Procedure Manual Item 3-1-056 II(F)(10) Decontamination/Aftercare Procedures.

<sup>35</sup> Procedure Manual Item 3-1-056 II(E)(1) Notification and Documentation.

<sup>36</sup> Procedure Manual Item 3-1-056 II(F)(13) Decontamination/Aftercare Procedures.



Juvenile Correctional Officer (SJCO)/Duty Officer or designee.<sup>37</sup> 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.<sup>38</sup>

One of the supplemental reports indicates that two SJCOs were on scene and that they assisted in supervising the decontamination process for Y2. DJCO 2's SIR narrative indicates that the duty officer was notified and directed staff to transport Y1 to the hospital for treatment unrelated to the OC spray. In addition, the main SIR indicates that staff notified Y1's guardian and that Y2's guardian would be notified by mail because they were unable to leave a message. The report also indicates that because YGC did not have a nurse available that day, both youths were transported to Juvenile Hall for observation and medical evaluation. The report states that Y1 was seen by medical staff within 40 minutes of being notified, and Y2 was seen within one hour and 15 minutes of medical staff being notified.

Finally, the report establishes that the Clinical Evaluation Guidance Unit (CEGU) was notified of the incident, and Y2's involvement, that afternoon and that she was seen within 30 minutes of the CEGU being notified. According to the report, the CEGU was notified of the incident, and Y1's involvement, that evening, and Y1 was seen immediately upon the CEGU being notified. As a result, both youths were seen within the 72 hours required by Department procedure.

### 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).<sup>39</sup> Further, the procedure requires a SIR and Restraint Report must include a clear and factual justification for the use of OC, efforts to de-escalate prior to use or reasons why de-escalation was not reasonably possible, youths and staff involved, the date, time and location of use, a complete description of decontamination procedures applied, and identification of any injuries and medical treatment.<sup>40</sup>

DJCO 1 completed the main SIR for this incident and three other DJCOs prepared supplemental incident reports. The main SIR identified the youths involved as well as the actions taken by DJCO 1 prior to the use of force. The report also sets forth the activities that occurred after the use of force, with the exception of an explanation for the delay in commencing decontamination procedures for Y1.

DJCO 1 also prepared a Use of Force (UOF) report for each youth to document the deployments of OC spray. While the report is complete, the entry documenting the number of times OC spray was used is misleading. It is clear from DJCO 1's narrative report that she deployed one burst of OC directed at Y1, and one burst of OC directed at Y2. However, DJCO 1 entered "2" in the "number of times spray was used" field on the Use of Force report for Y1 and also on the Use of Force report for Y2. This inconsistency makes it appear that DJCO 1 deployed a total of two bursts at each youth, when in fact, she deployed one burst at each youth.

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<sup>37</sup> Procedure Manual Item 3-1-056 II(F)(18) Decontamination/Aftercare Procedures.

<sup>38</sup> Procedure Manual Item 3-1-056 II(F)(17) Decontamination/Aftercare Procedures.

<sup>39</sup> Procedure Manual Item 3-1-015 VIII(F) DJCO Responsibilities.

<sup>40</sup> Procedure Manual Item 3-1-056 II(E)(2) Notification and Documentation.

Although there were multiple staff members that responded to assist with the incident, many staff members who assisted with escorts and/or decontamination did not prepare reports to document their involvement. As noted above, the main SIR did not provide an explanation for the delay in the commencement of Y1's decontamination. Reporting from the staff members directly involved with decontamination could have provided additional detail to help explain this delay.

#### *Recommendation*

Update PMI 3-1-056 to require that all staff members assisting with decontamination, even of uninvolved youth affected by overspray, prepare reports documenting their role in the decontamination process.

The OIR also observed some inconsistencies within submitted reports. For example, DJCO 1's UOF report indicated that Y1's decontamination began at 11:51 a.m., while DJCO 2's SIR narrative indicated that Y2 "started decontaminating at approximately 12:02PM." Discrepancies were also observed in DJCO 1's UOF report where it indicated that Y1 was seen by Medical at 12:40 p.m. DJCO 2 and DJCO 3's UOF reports indicated that Y1 was seen by Medical at 12:55 p.m. Similar discrepancies were also noted relating to when medical was contacted for Y2. DJCO 5's UOF report indicated that Medical was called at 11:34 a.m., while DJCO 1's UOF report for Y2 indicated that Medical was called at 12:15 p.m.

#### *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.

### Use of Force Review Board

On October 27, 2022, the Department's Use of Force Review Board convened and reviewed this use of force incident.

The Board made no recommendations for corrective action, but the Board recommended "that staff identified to write the main body SIR cover all events with all involved youths within the report, with other staff providing supplementals as to their specific involvement." The Board further recommended that information in the narrative of the report match with the UOF forms.

Finally, the Board recommended that staff who are a witness to the decontamination process or assist in controlling/moving youths in any way, write, at a minimum, a narrative if no further documentation is needed.

### Conclusion

A review of the SIRs and Use of Force reports established that the use of force by DJCO 1 was within law and policy. It is clear from the reporting that had DJCO 1 not deployed force, Y1 and Y2 would have continued to fight, potentially resulting in serious injuries.

## Recommendations

1. Update PMI 3-1-056 to specifically state that OC spray is classified as an intermediate level of force.
2. 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.
3. Update PMI 3-1-056 to require that all staff members assisting with decontamination, even of uninvolved youth affected by overspray, prepare reports documenting their role in the 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.