WASHINGTON DEPARTMENT OF CORRECTIONS
PRISON STAFFING MODEL REVIEW
JUNE 28, 2019

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EXECUTIVE SUMMARY

The Washington State Department of Corrections (DOC) retained CGL Companies to provide a comprehensive review and update of its Prison Staffing Models, to ensure they are consistent with the professional standards of contemporary correctional systems. CGL also developed an accurate shift relief factor based on current staff leave data and time away from post assignments for training.

Key Findings – Custody Staffing Model

Accurately determining the number of custody staff needed in a correctional facility requires developing a valid shift relief factor. Prisons operate 24 hours per day, 365 days a year. Given the fact that custody staff have regularly scheduled days off, vacations, utilize sick time, have training requirements etc., staffing any given post throughout the year will require more than one officer. A shift relief factor identifies the number of full-time equivalent positions (FTEs) it takes to fill a single custody post. Shift relief factors can vary across organizations based on leave usage and training practices. The need for an accurate relief factor cannot be understated as even a minor inaccuracy in a relief factor can have a significant impact on the number of staff needed in a large organization.

Finding – Custody Shift Relief Factor: The shift relief factor currently in use by the DOC is inaccurate and substantially undercounts the actual amount of time custody staff are not available to fill a post assignment. The true relief factor (based on 2018 data) is 1.80, which is a 7.8 percent increase over the relief factor currently in use (1.67).

Finding - Impact of Calculated Custody Shift Relief Factor: Applying the 2018 calculated relief factor (1.80) results in a requirement for an additional 250 custody staff above levels funded at the time of this review. This increase only addresses staff needed to support existing posts and does not take into consideration any increases in workload or new duties/functions that have been added or created in recent years.

Finding – Overtime/Extra Posts: High levels of overtime expenditures and extra post hours are strong indicators that current custody staff levels are insufficient.

The DOC tracks overtime hours by the reason for the overtime. During Fiscal Year 2018, it recorded over 745,000 hours of overtime in the system, which is excessive for a system of this size and expensive. Excessive overtime in any organization is often an indicator of understaffing and can have a negative impact on its overall operation. We know that the economic costs of overtime are high because it is usually paid at least at a 50 percent premium over straight time. But there are also intangible costs associated with excessive
overtime. Studies have shown that excessive overtime can lead to increases in absenteeism and use of leave time, thus creating a cycle where use of overtime creates the need for more overtime. Additionally, overtime has been shown to increase fatigue that can reduce an employee’s productivity and attentiveness while at the same time increasing their risk for on-the-job injuries.

Another indicator of inadequate staffing is the amount of extra post hours created to ensure daily workload is completed in the facilities. In fact, one of the most critical indicators of the inadequacy of the standardized Custody Staffing Model is the need for extra posts to be created on a daily basis that exceed the level of staffing dictated by the model. The significance of this extra post activity highlights where the Custody Staffing Model does not account for workload demands. A large portion of these extra hours result in officers being hired on overtime to fill these duties. If overtime is not used, officers are often pulled off their primary post to handle the assignment, thus reducing security coverage inside the institution or closing scheduled program activities.

During Fiscal Year 2018 there were over 780,000 extra post hours created of which 46 percent were the result of staff training needs. The total extra post hours are the equivalent of needing 482 additional staff (782,339.45 post hours divided by 1,623.6 net annual work hours). In our on-site reviews, we sought to ascertain whether the creation of extra posts and the need for overtime were the result of legitimate operational needs. These reviews found that daily workload demands supported the level of extra post and overtime hours experienced by the facilities.

**Finding – Areas with Critical Staffing Needs:** As part of our study, CGL reviewed all aspects of custody operations and found critical staffing shortages in several areas. Examples include:

- Transportation: The most significant area where understaffing exists in the DOC is in off-site transportation. At every facility visited we validated a shortage of transport staff to meet the daily demands. The result of this shortage has the following negative impacts on a facility:
  - Excessive overtime and extra post establishment to meet transport needs.
  - Closing of other posts to accommodate transport needs.
  - Closing of program activities to divert custody staff to transport functions.
  - Requirements for medical staff to triage cases and prioritize off-site trips for those incarcerated individuals who need treatment.
• Supervision in Community Hospitals: As the DOC’s offender population ages, their demand for medical services and off-site hospital admissions increases. The number of staff dedicated to supervising incarcerated individuals in community hospitals is insufficient to meet current needs.

• Close Observation/Suicide Watch: The management of individuals with serious mental health needs is a growing concern for correctional systems across the country. When individuals are in crisis, custody staff must be assigned to provide either intermittent or constant supervision. CGL’s observations found the number of staff prescribed by the current staffing model for mental health watches are insufficient to meet the need.

• Public Access: The public access post is responsible for ensuring that staff and visitors are authorized to enter the facility and carry no contraband on their person. On-site reviews found the current custody staffing model does not prescribe enough staff to meet this complicated and intensive duty. As a result, staff must be pulled from other posts during busy times of the day to provide assistance.

• Housing Special Populations: The existing staffing model is not sufficiently sensitive to the special programs and unique populations of particular facilities. The DOC has established therapeutic communities, and specialized housing and management for mental health, geriatric, residential parenting programs, intensive management, community corrections violators, geriatric inmates, transgendered inmates, and other specialized populations. These populations and their programs all differ significantly from each other and from general population and have unique and sometimes intensive staffing needs.

• Shift Sergeant Positions: CGL found the model did not identify enough sergeant positions at facilities to adequately provide supervision.

• Temporary Reassignments: Temporary reassignments are a significant portion of the extra post activity that takes place within the department and are an indicator of staff shortages. Reassignments occur for a number of different reasons including; meeting special facility or departmental needs, employee investigations into misconduct, FTE double fills, long-term absences of employees (including military leave), special projects, light-duty assignments for those employees that can only work on limited assignments due to injury and supervising construction workers involved in capital projects.

• Program/Recreation Supervision: At a number of facilities, we found insufficient correctional officer coverage to allow programs to operate with extended hours.
Ofentimes, staff assigned to these posts are reassigned elsewhere to cover more critical responsibilities such as transportation and mental health watches.

Correctional operations have grown complex and diverse over the past 30 years since the custody staffing model was first developed. Due to this and the uniqueness of operations at each of DOC’s facilities, CGL recommends that individual staffing models be developed for each institution, in place of attempting to develop a standardized system staffing model that applies to every facility. Such models should identify the number of FTEs needed for the facility to meet its current mission, given the distinctive characteristics of the facility, its existing incarcerated population, and the level of programs and services it provides. This will serve as the baseline for the facility’s staffing needs. When future changes to the facility population, mission or programs and services occur, DOC should then revise this baseline accordingly.

Key Findings – Non-Custody Staffing Model

Washington is the only state correctional system that has attempted to develop a standardized model to determine required levels of facility security staff. The standard practice in other state, local, and federal systems is to assess custody staffing needs on a facility by facility basis. However, many of the non-custody assignments included in the Non-Custody Staffing Model (NCSM) have very specific duties that do not vary by facility. Staffing for positions such as these can be more readily standardized, with allowances made for facility size and/or complexity.

Most states define standards or requirements for non-custody positions such as Facility CAO in department policy. Washington’s approach to compile these staffing requirements into a single non-custody staffing model is unique in form, but is consistent with the basic, workload/standards-based approach that most correctional systems use to determine certain categories of staffing needs.

**Finding: Non-Custody Staffing Methodology.** The NCSM workload standards for job assignments in most functional areas included in the model reflect accepted practices in correctional facility operations and provide appropriate guidance in determining staffing needs.

However, the Non-Custody Staffing Model has deficiencies in addressing resource needs in the following areas:

- **Counselors:** Designating counselor staffing levels to meet workload demands requires a detailed understanding of the very specific factors that make up counselor job duties. Because these factors can differ substantially across facilities, the use of a standardized model will not accurately reflect actual staffing needs. No single staffing model can accurately prescribe counselor staffing across the diversity of facility
missions and inmate needs in the DOC system. Counseling staffing levels should be determined on a facility-by-facility basis, following a detailed analysis of factors driving counselor workload in each facility.

- Records: The amount of work associated with inmate records responsibilities will vary depending upon the nature of the inmate population, the sophistication of the technology used to manage data, and the mission of the facility. The efficiency of workload management will similarly vary in relation to the experience/productivity of line staff, policies, management expertise, and technology utilization. This variability in responsibilities across records offices creates difficulties in establishing a standardized staffing pattern. Most correctional systems do not use fixed workload indicators to establish records office staffing levels. Instead, the more common practice is to rely on assessment of individual facility record office performance, issues, and efficiency in establishing staffing levels. The complex array of factors that drive inmate records workload, as well as ongoing changes in management approach do not support the use of a standardized model to determine staffing needs in this area.

- Cooks. In the positions covered by the NCSM, cooks work in positions that provide services 365 days a year on multiple shifts. As such, staffing for these positions needs to consider normal staff absences and availability for assignment. Best practices call for the use of a relief factor for these positions to provide an adequate cadre of relief staff. Staff absence data supplied by the Department show that the 8 hour/7 day per week shift relief factors for cooks should be set at 1.80.

- Physical Plant. The fundamental premise of the NCSM, basing plant staffing primarily on facility population is flawed. Physical plant staffing requirements are a function of facility conditions. Department facility physical plants range widely in terms of age, design, condition, and support needs. Age and population level do not necessarily provide adequate guidance as to staffing requirements. Best practices in correctional facility maintenance dictate that staffing levels follow from a detailed assessment of current facility conditions. This assessment provides the basis for development of a remedial and preventative maintenance plan required to assure continued facility operation and preservation of critical facility infrastructure systems. The conditions assessment necessarily must be done on a facility by facility basis to capture the unique conditions and needs of each institution.

Other Staffing Issues

The NCSM also does not address staffing requirements for the wide array of programs available in DOC facilities. As of December 2016, the Department offered over 80 distinct programs in the areas of Family & Relationships; Learning & Working; Religious, Spiritual,
Cultural; and Therapeutic and Support. Many of these programs have been developed since the creation of the NCSM and were not contemplated in the model’s original design.

The sheer number and diversity of these programs make it unlikely that a standardized model could effectively support program staffing decisions. A standardized model assumes that facilities of comparable size should require consistent levels of staffing across programs to provide equivalent levels of service. The fact however, is that program size and staffing can vary greatly by facility depending upon the needs of the inmate population specific to that facility, the availability of program space in the facility, the custody level of the facility, the availability of technology, and the level of resources available to support the program.

By far the most common approach for development of programs and associated staffing requirements in state correctional systems is on a facility basis, consistent with the specific needs, resource availability, and skill sets available at a given institution. The approach is typically “bottom-up,” with facility staff working in collaboration with central office staff to design and implement programs that conform with accepted formats within the context of unique local needs and resources. This approach results in closer alignment between facility needs and characteristics, and the program services provided.

**Finding: Program Staff.** The exclusion of program staffing from the NCSM is appropriate. Use of a standardized model is not an effective approach to determining facility program staffing needs. Program service staffing needs should be evaluated on a facility basis.

The Non-Custody Staffing Model does not address health care program staffing or needs. Health care programs at each facility have significant variations in the type of programs offered, services provided, and population characteristics. Evolving changes in healthcare service delivery needs have complicated program staffing in recent years. These include increased complexity in patient acuity, a growing number of geriatric offenders with multiple health issues, high rates of mental illness and substance abuse history, enhanced need for chronic care management, and the number of community supervision violators admitted to the correctional system with emergent medical and mental health care issues.

The Department faces the following issues in developing a health care staffing plan that provides an effective response to these service demands:

- No Electronic Health Record. The DOC lags significantly behind most state and large county correctional systems in its lack of a modern electronic health record (EHR) system. The lack of automation means that retrieving required data can be a time-consuming, manual process which make inefficient use of available health care staff resources. Development of a staffing plan that optimizes use of available resources requires detailed data on patient needs, treatment plans, and outcomes. The lack of an effective EHR makes the collection and analysis of this data problematic and continuity of care of the patient to the community virtually impossible.
• Lack of Nursing Relief Staff. Nurses also provide vital services on all shifts, every day of year in most facilities. Staffing for these positions needs to consider normal staff absences and availability for assignment. Currently, coverage for these assignments is provided through overtime and the use of contract staff. Best practices call for the use of a relief factor for these positions to provide an adequate cadre of relief staff. Staff absence data supplied by the Department show that the 8 hour/7 day per week shift relief factors for nurses should be set at 1.85.

• Inadequate Nurse Supervisory Coverage. Management supervision of nurse staffing is minimal, particularly on night shifts and weekends. RN 3s have responsibility for shift management, but are often required to provide relief coverage, making it impossible to provide adequate management oversight. This leaves floor nurses with minimal if any direction over their activities.

• Insufficient Medical Practitioner Support. Adequate clinical care requires assignment of medical assistants or nursing staff working in tandem with medical practitioners (physicians, psychiatrists, and advanced care practitioners). Current support staffing levels do not allow medical practitioners to make the best use of their available time and work at those specific tasks appropriate to their level of licensure. Clinical support staff are also needed for preventive health services, chronic disease tracking, chronic care management, coordination of post hospital discharge care coordination, support of MAT for opioid use disorder patients and release planning for successful reentry into the community.

Development of a standardized staffing model for health care services that addresses these issues and reflects the complexity of the health care system as well as the unique characteristics of each institution is very difficult. The dual goals of providing a simple, standardized methodology for determining staff requirements while still addressing specific facility issues are in extreme tension with each other. The National Commission on Correctional Health Care (NCCHC) recommends a detailed review of individual facility health care service characteristics and needs as the best practice for determining facility staffing needs.

**Finding: Health Care Staffing.** The first step toward improving health care services and conducting an accurate assessment of staffing needs is to implement a modern electronic health record system. Within the context of a facility-specific analysis, the use of basic workload metrics in conjunction with an adequate data and support infrastructure, can guide the foundation for an informed assessment health care staffing required to meet system objectives.
Other assignments not addressed by the NCSM including information technology, personnel management, and accounting. In many cases, staffing in these areas is not facility-based, but is instead functionally shared across facilities and managed by the DOC central office bureaus responsible for these functions. Many large state correctional systems such as Florida, Texas, Illinois, and Michigan have developed similar systems of shared administrative services to facilitate the most effective use of available resources to address evolving facility needs. The approach enhances central office discretion in the management of these functions. No state correctional system to our knowledge has attempted to develop a staffing model to guide staffing of these functions. Administrative functions managed by central office bureaus are not an appropriate subject for a standardized facility staffing model.
Background

In the 2018 Supplemental budget cycle, the Washington State Legislature provided funding for the Washington State Department of Corrections (DOC) to contract with an independent third party to provide a comprehensive review of the prison staffing model and develop an updated prison staffing model for use DOC. CGL was retained by the DOC to update its Custody Staffing Model to ensure it is more reflective of the staffing needs of contemporary correctional systems. The model was developed in the late 1980’s with the intent of ensuring that staffing allocations were consistent with policy and operational requirements and to avoid inconsistent or unnecessary allocation of resources. The objective was to standardize the deployment of staff and supervisors so that there was uniformity throughout the Department’s institutions. The model was developed in the late 1980’s with the intent of ensuring that staffing allocations were consistent with policy and operational requirements and to avoid inconsistent or unnecessary allocations of resources. The objective was to standardize the deployment of staff and supervisors so that there was uniformity throughout the Department’s institutions.

The model considers facility custody level(s), population levels and other variables to define staffing needs for each post. While it has undergone some minor modifications since originally issued, the model has become the de facto identifier of custody staffing needs against which all staffing requests are evaluated.

CGL has extensive experience evaluating operating practices and staffing needs in state correctional systems. This experience informs us that the DOC is the only correctional system that attempts to employ a standardized staffing model of this type. Other states, instead, identify staffing needs based on facility-specific assessments.

The DOC implements the Custody Staffing Model through post audits that are conducted at each facility. These post audits are completed by headquarters staff and use the requirements of the model to determine the staffing needs of each facility. Important components of the model include:

- Recognizes 50 different posts from Captain to Correctional Officers that may exist in the prisons.
- Provides guidelines for, and sets standardized staffing levels by shift for each post in each custody level of facility.
- Identifies variables that can be considered when determining staffing needs. These variables are identified for specific posts and can include; population level, perimeter type, and type of services provided.
• Provides for some auditor discretion in staffing level recommendations based on variables that are specific to individual facilities.

Project Approach

CGL approached this project with the intent of identifying where the current custody model failed to reflect staffing needs of contemporary correctional systems. We expected there might be posts where the model incorrectly prescribed the number and location of needed posts. It was our assumption that because the model was developed in the 1990’s and had minimal updates since, it would likely not be reflective of the significant changes that have impacted correctional systems in the past 25 years. As a result, we initiated the project with the intent of developing modifications to the model to improve its accuracy in identifying staffing needs.

CGL adopted a comprehensive project approach to ensure our recommendations met DOC’s needs. This included a detailed review of important documents that impact staffing needs in the facility as well as interviews with key headquarters staff and facility staff. Additionally, we conducted on-site reviews at seven correctional facility operations that, combined, represented over 70 percent of the DOC’s overall capacity and also provided a cross-section of its broad spectrum of operational requirements and practice.

Document Review: At the onset of the project CGL submitted an extensive document request to begin developing a foundational understanding of DOC policies, operations and staffing practices. The document request included the following:

• Facility descriptions including classification levels housed, scope of services offered and any unique mission.

• Internal policies or memo’s related to implementation and use of the Prison Staffing Model

• Past staffing model audits for all facilities

• Current funded staffing levels by position for all facilities.

• Current actual staffing levels by position for all facilities.

• 1 week of daily rosters (all shifts) and master roster for all facilities.

• Any court orders/consent decrees that impact security or program staffing

• Daily activity schedule for each facility

• Current inventory of program and services offerings at each facility
• Current bargaining unit contract
• Current and prior year budget information for all facilities
• Information regarding staff turnover rated, overtime usage.
• Site plans for each facility
• Staff shift schedules for all facilities
• Staff Retention/turnover rates, all facilities
• Current Shift Relief Factors in Use (all facilities)
• Average benefit time usage by position.
• Description of relieved and non-relieved posts for uniform and non-uniform staff
• Number of inmates actively engaged in programs or job assignments by facility
• Number of programming slots by program for each facility.
• Medical and mental health contracts.
• Ideal and actual caseloads for mental health, medical and program staff.
• Policy on cross gender supervision to include strip searches, pat searches, cross-gender announcements, etc.
• Overtime by facility
• Extra posts established by facility
• Facility post audits

This initial list was supplemented through additional document requests as the project review proceeded and added needs were identified. Additional facility-specific data was also collected during our site reviews.

Project Team/On-Site Reviews: CGL assembled a comprehensive team of correctional experts who have significant experience working in and evaluating correctional systems. Two of our team members were former administrators of state correctional systems. We also teamed with the Moss Group to use their expertise related to staffing for women’s facilities and staffing related to requirements of the Prison Rape Elimination Act (PREA). Combined the CGL team had conducted staffing analyses for more than 10 state correctional systems
including Florida, Alaska, Oklahoma, North Dakota, New Mexico, Kentucky, Indiana, Massachusetts, Virginia and the Commonwealth of Puerto Rico.

In consultation with the DOC, CGL developed a list of seven facilities it would visit to assess the Custody Staffing Model. The sample was developed to include a cross section of facilities from all of the DOC’s security levels, as well as reception centers and a women’s facility.

<table>
<thead>
<tr>
<th>Table 1: CGL Facility On-Site Visits</th>
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<tbody>
<tr>
<td><strong>Year Opened</strong></td>
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<tr>
<td>Airway Heights Corrections Center</td>
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<tr>
<td>Coyote Ridge Corrections Center</td>
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<tr>
<td>Washington Corrections Center for Women– Gig Harbor</td>
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<tr>
<td>Cedar Creek Corrections Center</td>
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<tr>
<td>Monroe Correctional Complex</td>
</tr>
<tr>
<td>Washington Corrections Center</td>
</tr>
<tr>
<td>Washington State Penitentiary</td>
</tr>
<tr>
<td>Sub-Total</td>
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<tr>
<td>Percent of Total DOC Prison Facility Capacity</td>
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</tbody>
</table>
The seven facilities CGL reviewed reflected over 76 percent of the system’s capacity. CGL also conducted interviews with department leadership in headquarters to gain an administrative understanding of staffing issues in the agency as well as how the model is used in defining staffing needs.

**Site Visit Protocol**: CGL developed a detailed protocol to assure consistency and standardization of our on-site reviews of facility staffing practices and needs. In all but Cedar Creek Corrections Center, the site visits covered two days. CGL had three main objectives for the site reviews:

1. Determine if current facility staffing is in compliance with existing staffing model guidelines
2. Establish whether Custody Staffing Model accurately identifies actual staffing needs.
3. Identify any modifications to the model to ensure that facility operational and programs needs are met in a safe and secure manner.

Prior to each site visit, the CGL team reviewed documents and information specific to the facility being visited. When the team arrived on-site, the review was conducted according to the following general schedule:

- Meet with facility administration regarding staffing model and staffing needs. Meeting included:
  - Introductions and purpose of the visit
  - Identification of facility mission(s)
  - Identification of any unique or special activities/programs that impact staffing needs for the facility.
  - Description of security level(s) of the facility and its impact on staffing needs.
  - Assessment of how the Custody Staffing Model is used to determine current staffing levels.
  - Comparison of current custody staffing levels vs. the model staffing recommendations to determine if any discrepancies exist
- Conduct an extensive tour of the facility, observing staff deployment, post responsibilities and conducting impromptu interviews with custody staff on post. Observing actual staff deployment, inmate living areas and other staff responsibilities
were key to fully understanding the unique role of the facility and the workloads associated with these roles.

- Conduct follow-up individual interviews with staff in key areas including but not limited to:
  - Custody supervision
  - Training
  - Transportation
  - Medical/Mental Health
  - Programs

- Based on interviews, document review and observations, identify gaps where model does not accurately identify staffing needs.

- Close-out with facility administration

The site reviews were invaluable to our assessment of the Custody Staffing Model and its applicability in a modern correctional system. At each of these facilities, CGL met with the facility leadership team to gain an understanding of the facility mission, its unique populations and services and begin to formulate its staffing needs. We toured each facility in detail, reviewing current post deployment and interviewing supervisory and line staff. We also observed incarcerated individual supervision practices and staffing demands related to inmate security, programs and services.
Relief Factor

As part of our contract with the DOC, CGL was charged with developing an accurate relief factor for custody staff. The agency specifically requested CGL develop a combined relief factor for Lieutenants, Sergeants and Correctional Officers. An accurate and current relief factor is critical to ensuring facilities are appropriately staffed. We were informed that the current relief factor has not been updated in many years, and that its use understates the amount of leave time actually used. In an agency the size of the DOC, any minor change in the relief factor will have a substantial impact on the number of staff needed.

Accurately determining the number of custody staff needed in a correctional facility requires an identification of the number of full-time equivalent positions (FTEs) it takes to fill a single post. Prisons operate 24 hours per day, 365 days a year. Given the fact that custody staff have regularly scheduled days off, vacations, utilize sick time, have training requirements etc., staffing any given post throughout the year will require more than one officer.

For example, a typical housing unit post may require coverage 8 hours per day, 7 days per week. The total number of hours of work required to staff the post on an annual basis is 2,920 hours:

\[(8 \text{ hours per day}) \times (365 \text{ days per year}) = 2,920 \text{ hours of required coverage}\]

Typical custody staff working an 8-hour shift are assigned a maximum of 2,088 hours per year. However, this maximum work availability does not reflect the amount of time custody staff are actually available to work a post. One critical requirement in developing a relief factor is determining the Net Annual Work Hours (NAWH) for an average employee. NAWH is the number of hours staff are employed to work in a year (2,088) minus the average number of hours a staff person is unavailable to work per year. Therefore, developing an NAWH requires determining the number of hours per year staff cannot work a post due to leave usage or off-post training.

A relief factor for an 8 hour/7 day per week post is calculated by dividing the total hours of required coverage (2,920) by the NAWH. The DOC applies a consistent relief factor, and this relief factor calculation is provided in the following table under the “Days” column. Best practices suggest that a relief factor calculation should be developed using “Hours” as the unit of measure. In this table we compare the current calculation using the “days” as the unit of measure to the same calculation using “hours” as the as the unit of measure. Also, the DOC currently truncates their relief factor to the nearest tenths decimal place. It is our recommendation that future relief factors be rounded to the nearest one-hundredths decimal place to improve accuracy.
Table 2 provides a breakdown of the DOC’s relief factor calculation comparing the calculation using “days” unit of measure against using “hours” as the unit of measure.

### Table 2: DOC Current Calculation of Custody Relief Requirements

<table>
<thead>
<tr>
<th>Step 1: Hours Available for Duty Calculation</th>
<th>Total Days/Hours in Work Year</th>
<th>Days Remaining</th>
<th>2,920 hours in year</th>
<th>Hours Remaining</th>
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<tbody>
<tr>
<td>- Regular days off</td>
<td>365 days in year</td>
<td>104</td>
<td>261</td>
<td>832</td>
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<tr>
<td>- Average Authorized Leave Days Used</td>
<td></td>
<td>22</td>
<td>239</td>
<td>176</td>
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<tr>
<td>- Average Sick Leave Used</td>
<td></td>
<td>13</td>
<td>226</td>
<td>104</td>
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<tr>
<td>- Average Time Away from Post for Training</td>
<td></td>
<td>8</td>
<td>218</td>
<td>64</td>
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<tr>
<td>Total Time Away from Post Assignment</td>
<td></td>
<td>147 days</td>
<td>1,176 Hours</td>
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<tr>
<td>Time Available to Fill Post (NAWH)</td>
<td></td>
<td>218 days</td>
<td>1,744 Hours</td>
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<table>
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<tr>
<th>Step 2: Relief Factor Calculation</th>
<th>8-hour/7-day per week post (2,920 ÷ 1,744 hours)</th>
<th>1.7</th>
<th>1.67</th>
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<tbody>
<tr>
<td>8-hour/5-day per week post</td>
<td>1.2</td>
<td>1.20</td>
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<tr>
<th>Step 3: Basic Post Requirements</th>
<th>One, 8-hour/5-day per week post</th>
<th>1.2</th>
<th>1.20</th>
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<tbody>
<tr>
<td>One 16-hour/5-day per week post</td>
<td>2.4</td>
<td>2.40</td>
<td></td>
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<tr>
<td>One 8-hour/7-day per week post</td>
<td>1.7</td>
<td>1.67</td>
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<tr>
<td>One 16-hour/7-day per week post</td>
<td>3.4</td>
<td>3.35</td>
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</tr>
<tr>
<td>One 24-hour/7-day per week post</td>
<td>5.1</td>
<td>5.02</td>
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<tr>
<th>Step 4: Holiday and Non-Holiday payment requirements</th>
<th>The DOC has established the average relief factor requirements for Holiday and non-holiday time to be 0.10 per 8-hour post</th>
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<table>
<thead>
<tr>
<th>Step 5: Total Custody Post Requirements</th>
<th>One, 8-hour/5-day per week post</th>
<th>1.3</th>
<th>1.30</th>
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<tbody>
<tr>
<td>One 16-hour/5-day per week post</td>
<td>2.6</td>
<td>2.60</td>
<td></td>
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<tr>
<td>One 8-hour/7-day per week post</td>
<td>1.8</td>
<td>1.77</td>
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<td>One 16-hour/7-day per week post</td>
<td>3.6</td>
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<tr>
<td>One 24-hour/7-day per week post</td>
<td>5.4</td>
<td>5.32</td>
<td></td>
</tr>
</tbody>
</table>

Based on DOC’s current relief factor and using the increment of “days,” it takes 1.7 FTEs to fill a single 8-hour/7-day per week post. In Step 5 of the calculation, DOC adds 0.10 to the
relief factor to cover the budgetary requirements for holiday and non-holiday time bringing the total relief factor to 1.8 for a post.

We could not determine if this calculation was based on valid leave and training data. The 2015 Prison Overtime Usage Report to the Legislature indicated that the relief factors had not been updated in over 25 years.

Over the past several decades the use of leave time and amount of training provided to correctional staff has increased causing relief factors to rise. Most jurisdictions have seen leave usage grow due to the introduction of the Family Medical Leave Act (FMLA) as well as legal changes regarding an employer’s ability to challenge leave usage. In jurisdictions with significant overtime, absenteeism has also been rising. Additionally, increased training requirements designed to better prepare staff to complete their complex job responsibilities have also increased time away from post assignments.

Our on-site observations supported that current relief posts for training were inadequate. In DOC facilities, there are a handful of relief posts available to staff for training, however, much fewer than are required to meet the various training mandates. Correctional staff are required to receive 40 hours of off-site training per year and specialty teams must receive eight hours of training each month. Much of the training causes the use of overtime to backfill for the officers being trained. In addition to overtime, the lack of training relief posts results in the use of unfunded on-call officers. This issue has become more complex with time as training mandates have dramatically increased.

For example, a discussion with the training administrator at the Monroe complex is instructive. At that facility there are 17 correctional officers and two sergeants available to provide training relief for 665 staff. It appears that the training relief factor is not accurate as often times the use of staff on overtime or unfunded on-call officers is required to fill vacant posts created by staff attending mandatory training. It should also be noted that oftentimes the instructors are drawn from custody staff, who often must also be relieved. A look at training activity for a 12-month period at the Monroe Complex in 2017/18 reveals that there were 59,429 hours of mandatory training and instructor assignments and over 9,000 hours of these were covered with overtime (not including on-call usage). In a perfect world the number of hours would be significantly less and the number of relief staff available to backfill for officers on training would be higher. One Superintendent advised us that the training relief positions were developed when training mandates were half of what they are today. Some of the specific training requirements are listed below, which is evidence of the demands caused by these training requirements.

- In Service Training (custody staff) – 40 hours per year
• Specialty Teams – eight hours per month
• Bomb Squad – program every five years
• Mandatory Computer Training – 3.5 hours per year, FY 19
• CORE Training (new officer basic training) – 24 days + 16 hours weapons training and three days shadow training
• Supervisors Use of Force training – two to four hours annually
• Duty Officer Training/Managers – Two to four hours annually
• Case Management Academy – 40 hours for newly hired case management staff
• Administrative Orientation, new employees – three days
• Incident Command training – 16 hours
• Administrative Investigation training – 16 hours
• Supervisor and Leadership training, all supervisors – 32 hours
• Disciplinary Hearing officers – 24 hours
• E I D training certification – 16 hours
• Defensive Tactics, less lethal, three-year certification – 32 hours
• Oleo Capsicum, three-year certification – eight hours
• Bandit, two-year certification – eight hours
• EID Shield, two-year certification – 16 hours
• Training for Trainers instructor training – 32 hours
• Firearms instructor training, 80 hours for certification – eight hours each year thereafter
• Defense Tactics Control – 80 hours initial, 16 hours after initial training annually
• First Aid – two days certification class
• EMS – 24 hours classroom
• Sexual Harassment – eight hours
- Prison Safety – eight hours
- Prison Rape Elimination Act – eight hours

The above listing of programs and time requirements are not requirements that all staff need to complete, however they illustrate the complexity of the training issue and aids in understanding that the current relief for training is inadequate.

When staffing needs fall outside the established, regular daily posts on the shift rosters, facilities create “extra posts” in the ATLAS system. Extra post hours are tracked by the specific reason for the extra post (training needs, transportation, hospital watch needs, etc.) Data reviewed underscores the workload issues created by these enhanced training requirements. CGL was provided extra post hours broken by the type of extra post for a twelve-month period (November 2017 through October 2018). Although facilities have funded training relief posts, it is clear from our on-site reviews and examination of the data that these relief posts do not adequately meet the needs of modern correctional training requirements. Figure 1 identifies the number of extra post hours established during this twelve-month period for training related requirements (both staff in training and training instructors).

**Figure 1: Training-Related Extra Post Hours**

![Graph showing extra post hours by facility]

In total there were over 356,000 extra post hours for training. Of these extra post hours, nearly 52,000 resulted in the need for overtime. Each of the facilities is unable to meet their training requirements with the training relief provided by the current custody staffing model as evidenced by the overtime hours incurred.

**Relief Factor Calculation:** CGL used the following data to develop a valid relief factor:
• Actual Leave Data: CGL was provided an Excel spreadsheet on January 24, 2019 titled “CGIDOCLeave.xlsx” that contained the following information for calendar years 2017 and 2018:
  o Total leave hours broken by:
    ▪ Type of leave,
    ▪ Position Classification (Correctional Officer, Sergeant and Lieutenant)
  o Average number of FTEs broken by position classification

• Hours Away from Post for Training: CGL interviewed training coordinators in its site visits to develop an estimate of average time away from post for training including annual training, pre-service training and specialty training.

The following table presents CGL’s calculation of time away from post, net annual work hours and the calculated relief factor for CY2017 and CY2018.

Table 3: Relief Factor Calculation – 2017 and 2018

<table>
<thead>
<tr>
<th>Calculated Relief Factors</th>
<th>CY2017</th>
<th>CY2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Days/Hours in Work Year</td>
<td>2,920 hours in year</td>
<td>2,920 hours in year</td>
</tr>
<tr>
<td>- Regular days off</td>
<td>832</td>
<td>832</td>
</tr>
<tr>
<td>- Average Authorized Leave Days Used</td>
<td>208.3</td>
<td>215.8</td>
</tr>
<tr>
<td>- Average Sick Leave Used</td>
<td>122.1</td>
<td>146.6</td>
</tr>
<tr>
<td>- Average Time Away from Post for Training</td>
<td>102.0</td>
<td>102.0</td>
</tr>
<tr>
<td>Total Time Away from Post Assignment</td>
<td>1,264.4 hours</td>
<td>1,296.4 hours</td>
</tr>
<tr>
<td>Time Available to Fill Post (NAWH)</td>
<td>1,655.6 hours</td>
<td>1,623.6 Hours</td>
</tr>
<tr>
<td>8-hour/7-day per week post (2,920 ÷ NAWH)</td>
<td>1.76</td>
<td>1.80</td>
</tr>
<tr>
<td>8-hour/5-day per week post (2,088 ÷ NAWH)</td>
<td>1.26</td>
<td>1.29</td>
</tr>
<tr>
<td>One, 8-hour/5-day per week post</td>
<td>1.26</td>
<td>1.29</td>
</tr>
<tr>
<td>One 16-hour/5-day per week post</td>
<td>2.52</td>
<td>2.58</td>
</tr>
<tr>
<td>One 8-hour/7-day per week post</td>
<td>1.76</td>
<td>1.80</td>
</tr>
<tr>
<td>One 16-hour/7-day per week post</td>
<td>3.52</td>
<td>3.60</td>
</tr>
</tbody>
</table>
Calculated Relief Factors

<table>
<thead>
<tr>
<th>Step 4: Holiday and Non-Holiday payment requirements</th>
<th>CY2017</th>
<th>CY2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>One 24-hour/7-day per week post</td>
<td>5.28</td>
<td>5.40</td>
</tr>
<tr>
<td>The DOC has established the average relief factor requirements for Holiday and non-holiday time to be 0.10 per 8-hour post</td>
<td>0.10</td>
<td>0.10</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Step 5: Total Custody Post Requirements</th>
<th>CY2017</th>
<th>CY2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>One, 8-hour/5-day per week post</td>
<td>1.36</td>
<td>1.39</td>
</tr>
<tr>
<td>One 16-hour/5-day per week post</td>
<td>2.72</td>
<td>2.78</td>
</tr>
<tr>
<td>One 8-hour/7-day per week post</td>
<td>1.86</td>
<td>1.90</td>
</tr>
<tr>
<td>One 16-hour/7-day per week post</td>
<td>3.72</td>
<td>3.80</td>
</tr>
<tr>
<td>One 24-hour/7-day per week post</td>
<td>5.58</td>
<td>5.70</td>
</tr>
</tbody>
</table>

In 2018, the average custody employee was unable to fill a post for 464.4 hours of their assigned annual work schedule. This included 215.8 hours of authorized leave and 146.6 hours of sick leave. Additionally, CGL estimated a custody employee was away from their post for 102 hours per year due to training requirements. As a result, the Net Annual Work Hours (NAWH) for post assignment were 1,623.6 (2,088 total assigned hours – 464.4 hours away from post), and the 2018 relief factor for an 8-hour/7-day per week post is 1.80.

CGL was informed that in early 2018, management’s ability to question sick leave usage was further restricted as the result of a statute change. DOC headquarters staff believed this change would cause a resulting increase in sick leave usage. Additionally, vacation accruals for state employees also increased in 2017. As a result, we calculated separate relief factors for 2017 and 2018, using leave data from each year. We did find that sick leave usage increased in 2018 and was also accompanied by increases in vacation time and compensatory time usage (Table 4). Overall leave usage increased by 32 hours per custody employee in 2018.

**Table 4: Changes in Key Leave Category Usage: 2017 vs. 2018**

<table>
<thead>
<tr>
<th>Leave Category</th>
<th>2017</th>
<th>2018</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compensatory Time</td>
<td>31.0 hours</td>
<td>39.7 hours</td>
<td>+8.8 hours</td>
</tr>
<tr>
<td>Sick Time</td>
<td>78.4 hours</td>
<td>87.4 hours</td>
<td>+8.9 hours</td>
</tr>
<tr>
<td>Vacation Time</td>
<td>118.1 hours</td>
<td>126.2 hours</td>
<td>+8.1 hours</td>
</tr>
<tr>
<td>Total Leave Usage*</td>
<td>330.7 hours</td>
<td>363.5 hours</td>
<td>32.7 hours</td>
</tr>
</tbody>
</table>

*Total Leave Usage includes assault/time loss, compensatory time, FMLA, LWOP, military, miscellaneous, personal holiday, shared, sick and vacation leave.
The relief factor calculations were further broken down by position classification (Correctional Officer, Sergeant and Lieutenant) and provided for 8-hour, 5 day per week posts as shown in the following table.

**Table 5: 2017 and 2018 Calculated Relief Factors by Position Classification**

<table>
<thead>
<tr>
<th>Year</th>
<th>Correctional Officer</th>
<th>Sergeant</th>
<th>Lieutenant</th>
<th>Combined</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8-hour, 7 day per week</td>
<td>1.76</td>
<td>1.76</td>
<td>1.77</td>
<td>1.76</td>
</tr>
<tr>
<td>8-hour, 5 day per week</td>
<td>1.26</td>
<td>1.26</td>
<td>1.26</td>
<td>1.26</td>
</tr>
<tr>
<td>2018</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8-hour, 7 day per week</td>
<td>1.80</td>
<td>1.80</td>
<td>1.77</td>
<td>1.80</td>
</tr>
<tr>
<td>8-hour, 5 day per week</td>
<td>1.29</td>
<td>1.28</td>
<td>1.26</td>
<td>1.29</td>
</tr>
</tbody>
</table>

Based on the data provided, the most current relief factor for an 8-hour, 7-day per week post is 1.80.

**Finding:** The relief factor currently in use is inaccurate and substantially undercounts the actual amount of time staff are away from post assignment. The true relief factor (for 2018) is 1.80, which is a 7.8 percent increase over the relief factor currently in use (1.67).

CGL has completed work in many state correctional systems, and as a result can provide a comparison of DOC’s calculated relief factor to those states. Table 6 provides this comparison:

**Table 6: Relief Factors from Other States**

<table>
<thead>
<tr>
<th>State</th>
<th>Relief Factor (8-hour, 7-day shift)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>1.61</td>
</tr>
<tr>
<td>Alaska</td>
<td>1.72</td>
</tr>
<tr>
<td>Florida</td>
<td>1.57</td>
</tr>
<tr>
<td>Indiana</td>
<td>1.75</td>
</tr>
<tr>
<td>Kentucky</td>
<td>1.79</td>
</tr>
<tr>
<td>Louisiana</td>
<td>1.60</td>
</tr>
<tr>
<td>Massachusetts</td>
<td>1.90</td>
</tr>
<tr>
<td>New Mexico</td>
<td>1.71</td>
</tr>
<tr>
<td>Utah</td>
<td>1.92</td>
</tr>
<tr>
<td>Virginia</td>
<td>1.72</td>
</tr>
</tbody>
</table>
The DOC’s relief factor would rank as the third highest behind Utah’s (1.92) and Massachusetts (1.90)

CGL split the calculated relief factor into the categories used by the DOC, which included relief for regular days off (RDO), authorized leave (A/L), sick leave (S/L) and training (T/L). The following table provides the calculated relief factor for each relief type for 2018:

<table>
<thead>
<tr>
<th>Relief Type</th>
<th>(B) Calculated Relief Factor (=2,920/Column A)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regular Days Off</td>
<td>0.51</td>
</tr>
<tr>
<td>Authorized Leave</td>
<td>0.13</td>
</tr>
<tr>
<td>Sick Leave</td>
<td>0.09</td>
</tr>
<tr>
<td>Training</td>
<td>0.06</td>
</tr>
<tr>
<td>Total</td>
<td>0.80*</td>
</tr>
</tbody>
</table>

*Column does not total due to rounding

Determining the relief factor for each individual leave type and training in Table 6 is calculated through a mathematical process involving cross multiplication of proportions. We know that the total relief factor of 1.80 relates to the need to fill 2,920 shift hours in a year. The question is what relief factor is needed to fill the specific hours away from post for each leave type and training. The formula is as follows:

\[
\frac{2,920 \text{ total shift hours}}{1.80 \text{ relief factor}} = \frac{\text{RDO/Leave/Training hours}}{\chi}
\]

Where \(\chi\) is the unknown

For example, to calculate the regular days off (RDO) relief factor the following equation is established:

\[
\frac{2,920 \text{ total shift hours}}{1.80 \text{ relief factor}} = \frac{832 \text{ RDO hours / year}}{\chi}
\]

This formula is a proportion and can be read as: 2,920 is to 1.80 as 832 is to \(\chi\).

Solving this equation involves cross multiplication, where the 1.80 relief factor is multiplied by 832 RDO hours, then the product is divided by 2,920 total shift hours. This results in a relief factor for RDO of 0.51. Similar calculations can be completed for sick and authorized leave
by replacing the 832 RDO hours with the appropriate number of annual hours for each leave type.

Because DOC has been using an outdated, inaccurate relief factor that is based on lower rates of leave and training time than is actually used, it has been underreporting its true staffing needs. CGL developed actual staffing needs by using post recommendations from the most recent post audits conducted at each of the twelve facilities. Table 8 compares the number of custody staff needed when using the old relief factor versus the actual 2018 relief factor. We note that the DOC applies an additional relief factor of 0.10 to all 7-day posts. This amount provides additional funding to the agency to pay for the overtime that results from staff required to work holidays.

### Table 8: Staffing Needs Comparison

<table>
<thead>
<tr>
<th>Facility</th>
<th>Column A Staff Needed – Outdated Relief Factor (1.67* plus 0.10 Holiday/Non-Holiday)</th>
<th>Column B Staff Needed – 2018 Actual Relief Factor (1.80 plus 0.10 Holiday/Non-Holiday)</th>
<th>Column C Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airway Heights Corrections Center</td>
<td>333.9</td>
<td>357.8</td>
<td>+23.9</td>
</tr>
<tr>
<td>Cedar Creek Corrections Center</td>
<td>70.0</td>
<td>75.0</td>
<td>+5.0</td>
</tr>
<tr>
<td>Clallam Bay Corrections Center</td>
<td>270.8</td>
<td>290.3</td>
<td>+19.5</td>
</tr>
<tr>
<td>Coyote Ridge Corrections Center</td>
<td>385.4</td>
<td>413.4</td>
<td>+28.0</td>
</tr>
<tr>
<td>Larch Corrections Center</td>
<td>65.2</td>
<td>69.8</td>
<td>+4.7</td>
</tr>
<tr>
<td>Mission Creek Corrections Center</td>
<td>65.0</td>
<td>69.6</td>
<td>+4.6</td>
</tr>
<tr>
<td>Monroe Correctional Complex</td>
<td>722.4</td>
<td>774.4</td>
<td>+52.0</td>
</tr>
<tr>
<td>Olympic Corrections Center</td>
<td>60.9</td>
<td>65.3</td>
<td>+4.4</td>
</tr>
<tr>
<td>Stafford Creek Corrections Center</td>
<td>287.4</td>
<td>308.1</td>
<td>+20.7</td>
</tr>
<tr>
<td>Washington Corrections Center</td>
<td>386.3</td>
<td>414.1</td>
<td>+27.8</td>
</tr>
<tr>
<td>Washington Corrections Center for Women</td>
<td>240.0</td>
<td>257.3</td>
<td>+17.3</td>
</tr>
<tr>
<td>Washington State Penitentiary</td>
<td>689.6</td>
<td>739.5</td>
<td>+49.9</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>3,576.6</strong></td>
<td><strong>3,834.5</strong></td>
<td><strong>+257.9</strong></td>
</tr>
</tbody>
</table>

* Outdated relief factor calculated from recent post audits and applied to number of posts recommended in audit.

**Coyote Ridge has some 12 hours shifts, a relief factor adjusted for a 12 hours shift is applied for those specific posts

Notes: Due to rounding in post audits, the number of staff in Outdated Relief Factor column do not exactly match what is listed in the post audit.
Applying the 2018 relief factor increases the actual number of custody staff needed by over 258 positions.

Finding: The current relief factor in use is inaccurate and contributes to the underreporting of custody staffing needs in the facilities. Using the 2018 calculated relief factor results in the requirement for an additional 258 staff above past post audit recommendations. This increase only addresses staff needed to support existing posts and does not take into consideration any increases in workload or new duties/functions that have been added or created in recent years.

The first page of the post audits developed by DOC identify the funded level of security positions for the facilities. We found that when applying the outdated relief factor (1.67) the number of staff needed in Column A of Table 8 varied from the funded levels at each facility. Table 9 compares this funded level the first page of the post audits to the needed level with the calculated relief factor applied.

<table>
<thead>
<tr>
<th>Facility</th>
<th>Funded Level</th>
<th>Staff Needed – 2018 Actual Relief Factor (1.80)</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airway Heights Corrections Center</td>
<td>334.8</td>
<td>357.8</td>
<td>+23.0</td>
</tr>
<tr>
<td>Cedar Creek Corrections Center</td>
<td>70.1</td>
<td>75.0</td>
<td>+4.9</td>
</tr>
<tr>
<td>Clallam Bay Corrections Center</td>
<td>271.5</td>
<td>290.3</td>
<td>+18.8</td>
</tr>
<tr>
<td>Coyote Ridge Corrections Center*</td>
<td>387.5</td>
<td>413.4</td>
<td>+25.9</td>
</tr>
<tr>
<td>Larch Corrections Center</td>
<td>65.1</td>
<td>69.8</td>
<td>+4.7</td>
</tr>
<tr>
<td>Mission Creek Corrections Center</td>
<td>64.1</td>
<td>69.6</td>
<td>+5.5</td>
</tr>
<tr>
<td>Monroe Correctional Complex</td>
<td>723.3</td>
<td>774.4</td>
<td>+51.1</td>
</tr>
<tr>
<td>Olympic Corrections Center</td>
<td>60.7</td>
<td>65.3</td>
<td>+4.6</td>
</tr>
<tr>
<td>Stafford Creek Corrections Center</td>
<td>288.4</td>
<td>308.1</td>
<td>+19.7</td>
</tr>
<tr>
<td>Washington Corrections Center</td>
<td>387.8</td>
<td>414.1</td>
<td>+26.3</td>
</tr>
<tr>
<td>Washington Corrections Center for Women</td>
<td>240.2</td>
<td>257.3</td>
<td>+17.1</td>
</tr>
<tr>
<td>Washington State Penitentiary</td>
<td>691.2</td>
<td>739.5</td>
<td>+48.2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>3,584.7</strong></td>
<td><strong>3,834.5</strong></td>
<td><strong>+249.8</strong></td>
</tr>
</tbody>
</table>

* Coyote Ridge has some 12 hours shifts, a relief factor adjusted for a 12 hours shift is applied for those specific posts

Notes: Funded levels were extracted from page 1 of each facility post audit. Funded and Needed staff levels include 0.10 relief factor for Holiday/Non-Holiday related overtime.

Applying the calculated relief factor to existing posts results in the need for 250 staff above current funded levels.
Finding: The 2018 calculated relief factor results in the requirement for an additional 250 staff above funded levels (identified on page 1 of each facility post audit). This increase only addresses staff needed to support existing posts and does not take into consideration any increases in workload or new duties/functions that have been added or created in recent years.
Overtime

Adequately staffing correctional facilities has a direct impact on overtime expenditures. Excessive overtime in any organization is often an indicator of understaffing and can have a negative impact on its overall operation. We know that the economic costs of overtime are high because it is usually paid at least at a 50 percent premium over straight time. But there are also intangible costs associated with excessive overtime. Studies have shown that excessive overtime can lead to increases in absenteeism and use of leave time, thus creating a cycle where use of overtime creates the need for more overtime. Additionally, overtime has been shown to increase fatigue that can reduce an employee’s productivity and attentiveness while at the same time increasing their risk for on-the-job injuries.

The DOC tracks overtime hours by the reason for the overtime. During Fiscal Year 2018, it recorded over 745,000 hours of overtime in the system. Table 10 identifies the breakdown of these hours by the rationale for the overtime.

Table 10: FY2018 Overtime Hours

<table>
<thead>
<tr>
<th>Reason for Overtime</th>
<th>Hours of Overtime</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sick Leave</td>
<td>151,804</td>
</tr>
<tr>
<td>Authorized Leave</td>
<td>74,402</td>
</tr>
<tr>
<td>Other Leave</td>
<td>12,527</td>
</tr>
<tr>
<td>L &amp; I Leave (Workers Compensation)</td>
<td>9,705</td>
</tr>
<tr>
<td>Vacancies</td>
<td>58,421</td>
</tr>
<tr>
<td>Training</td>
<td>48,665</td>
</tr>
<tr>
<td>Holiday</td>
<td>202,715</td>
</tr>
<tr>
<td>Escort (Transport)</td>
<td>18,444</td>
</tr>
<tr>
<td>Non-Standard Post Coverage</td>
<td>72,579</td>
</tr>
<tr>
<td>Emergency Response</td>
<td>27,362</td>
</tr>
<tr>
<td>Offender Processing</td>
<td>9,950</td>
</tr>
<tr>
<td>Special Watches</td>
<td>58,875</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>745,449</strong></td>
</tr>
</tbody>
</table>

Holiday-related overtime is generated when employees required to work a holiday get paid overtime for the hours worked, in addition to their straight-time rate.

Overtime is typically paid at a rate of 1.5 times (or 150%) the employee’s salary. However, there are additional benefit charges tied to overtime that increase DOC costs. Table 11
identifies the DOC’s total cost of overtime is actually 170 percent of an employee’s base salary.

Table 11: Overtime Cost Components

<table>
<thead>
<tr>
<th>Cost Components of Overtime</th>
<th>Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salary</td>
<td>150%</td>
</tr>
<tr>
<td>Old Age and Survivors Insurance (OASI)</td>
<td>6.2%</td>
</tr>
<tr>
<td>Retirement</td>
<td>12.4%</td>
</tr>
<tr>
<td>Medicare</td>
<td>1.5%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>170%</strong></td>
</tr>
</tbody>
</table>

The average base salary of a Correctional Officer in the DOC is $55,248, or $26.56 per hour. Consequently, the hourly cost of overtime for those employees is $45.12 ($25.56 x 170%). Conservatively assuming all the overtime hours were for correctional officer positions results in the 2018 total overtime expense of over $33 million.

Another indicator of inadequate staffing is the amount of extra post hours created to ensure daily workload is completed in the facilities. In fact, one of the most critical indicators of the inadequacy of the standardized Custody Staffing Model is the need for extra posts to be created on a daily basis that exceed the level of staffing dictated by the model. The significance of this extra post activity highlights where the Custody Staffing Model does not account for workload demands. A large portion of these extra hours result in officers being hired on overtime to fill these duties. If overtime is not used, officers are often pulled off their primary post to handle the assignment, thus reducing security coverage inside the institution or closing scheduled program activities.

The DOC maintains detailed records in their ATLAS system that log the number of extra post hours and types of extra posts created. Table 12 illustrates the activities/functions where extra posts are created to perform the work needed for essential correctional operations. In the table the number of extra post hours are presented as well the number of additional staff that would be needed to eliminate these extra post hours (Staff Equivalent column). What is essential to understand is that all of this activity is above and beyond what is authorized in the Custody Staffing Model. The most significant number of hours is related to the training of staff, which was previously discussed in this report.
Table 12: Extra Posts Hours by Major Category

<table>
<thead>
<tr>
<th>Category</th>
<th>Total Hours</th>
<th>% of Total</th>
<th>Staff Equivalent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Staff Training (Includes Instructor Hours)</td>
<td>356,028.34</td>
<td>46%</td>
<td>219</td>
</tr>
<tr>
<td>Temporary Assignment</td>
<td>121,268.35</td>
<td>16%</td>
<td>75</td>
</tr>
<tr>
<td>Off-Site Hospital Watch &amp; Hospital Relief</td>
<td>89,706.93</td>
<td>11%</td>
<td>55</td>
</tr>
<tr>
<td>Transport</td>
<td>51,813.64</td>
<td>7%</td>
<td>32</td>
</tr>
<tr>
<td>Special Watches</td>
<td>48,114.23</td>
<td>6%</td>
<td>30</td>
</tr>
<tr>
<td>Other</td>
<td>115,407.96</td>
<td>15%</td>
<td>71</td>
</tr>
<tr>
<td>Total</td>
<td>782,339.45</td>
<td></td>
<td>482</td>
</tr>
</tbody>
</table>

Source: DOC spreadsheet “Prison Extra Post Hrs._Nov17-Oct18.xlsx”

Note: Staff Equivalent calculated by dividing total hours by the calculated number of hours an employee can fill a post assignment (1,623.6 hours)

During the twelve-month period there were over 780,000 extra post hours created of which 46 percent were the result of staff training needs. The total extra post hours are the equivalent of needing 482 additional staff (782,339.45 post hours divided by 1,623.6 net annual work hours).

In our on-site reviews, we sought to ascertain whether the creation of extra posts and the need for overtime were the result of legitimate operational needs. These reviews found that daily workload demands supported the level of extra post and overtime hours experienced by the facilities.

Finding: High levels of overtime expenditures and extra post hours are strong indications that current custody staffing levels are insufficient.
Analysis of Existing Custody Staffing Model

In the last 30 years, determining the staffing needs in a correctional setting has become increasingly more complex and detailed. There are a multitude of factors that must be considered and a significant amount of data that must be assessed and understood for an accurate calculation of facility staffing requirements. CGL follows national best practices in conducting staff assessments for correctional facilities. These best practices are encapsulated in the National Institute of Corrections (NIC) publication entitled “Prison Staffing Analysis: A Training Manual”. When CGL conducts a staffing assessment for individual correctional facilities it does so with the understanding that each facility is unique and must be evaluated independently. As a result, we base our analysis on a review of individual facility assignment rosters, observation of specific facility operations during multiple shifts, interviews with both line, program and command staff, and an evaluation of the facility including but not limited to the following key factors:

- **Facility mission**: The individual missions of each facility play a major role in setting requirements for staffing needs. Lower security facilities usually need fewer security staff needed for the control and management of the population but also may have a significant number of programs that increase staffing needs. Many modern facilities now serve unique population cohorts and as a result have distinct staffing needs associated with the supervision and support of these specialized populations.

- **Facility layout**: The design of the facility determines the framework in which the facility will operate. The physical design of the facility will impact the minimum number of posts required to provide adequate supervision of the population.

- **Inmate classification and housing practices**: The type of incarcerated individuals housed or assigned to an area will have a large bearing on the need for supervision and the potential risk level present. The standard classification system (maximum, medium, and minimum security) has a direct bearing on the staffing required.

- **Inmate movement patterns**: The degree of incarcerated individual movement and the nature of that movement (escorted or unescorted) relate directly to the degree of control exercised over inmate behavior and the staffing required to enforce the desired level of control.

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• **Surveillance technology.** Technology, which can be deployed to provide ongoing surveillance of inmate activity, can increase the efficiency of staff used to monitor multiple locations or blind spots in a facility or work area.

• **Training policies.** The degree to which training activity takes staff away from their duties will create a demand for relief staff or for the use of overtime.

• **Level and intensity of programs and services.** As corrections has evolved it has taken on increased responsibility for providing evidence-based programs to both the general population and to targeted populations with specific needs. Additionally, mental health and medical treatment requirements have expanded in past years to accommodate increased expectations. This mission increases workloads associated with both custody and programs staff.

• **Prioritization of posts.** The ability of management to objectively evaluate its post requirements and to determine which posts can be safely closed under certain circumstances can go a long way to determining an efficient allocation of staff for a facility or work area.

• **Collective bargaining agreement.** Labor contract provisions often impact how staff are deployed and the number of staff needed to operate an institution. Benefits bargained for in labor contracts can also influence the relief factor.

• **Operating procedures/standards.** A prison’s operating procedures and standards set out a blueprint for staffing by outlining the duties required of them in the conduct of their jobs.

• **Court orders/consent decrees.** Past court orders often set requirements that influence the number of custody staff needed.

• **Responses to serious incidents.** Often, past serious incidents in the correctional system have resulted in the implementation of enhanced security practices that increase staff workload demands.

**Evolution of Correctional Practice Complexity:** CGL approached this project with the intent of identifying where the current custody model failed to reflect staffing needs of contemporary correctional systems. We assumed there might be posts where the model incorrectly prescribed the number and location of needed posts. It was our assumption that because the model was developed in the 1990’s and had minimal updates since, it would likely not be reflective of the significant changes that have impacted correctional systems in the past 25 years. As a result, we went into the project with the intent of developing modifications to the model to improve its accuracy in identifying staffing needs.
However, as we conducted our site reviews, it became clear that the complexity and diversity of modern correctional systems do not lend themselves to a standardized staffing model. While a model may have been effective decades ago, it has limited validity in today’s complicated correctional environment. This complexity is likely the reason that the other 49 state correctional systems don’t employ any similar standardized staffing model.

It is important to understand the extensive transformation that correctional systems have undergone since the 1990’s. While managing correctional systems in the 1990’s was by no means simple, it has become exceedingly more sophisticated and complicated since that time. This change has been driven partly by an increasing offender population, but even more so by increased legal and societal expectations on correctional practices. In the State of Washington this transformation has been profound. When the existing staffing model was developed in the early 1990’s, the state’s prison population was 10,429. Today the population is 63 percent higher with 16,955 individuals in the DOC’s prisons on December 31, 2018. Most correctional systems have experienced similar growth, however, it is not this growth alone that has been the sole reason for increased complexity of correctional operations. Changes in operational and programmatic expectations have increased the demands placed on correctional practices and created systems that are more multifaceted. These changes have driven increased staffing needs and include:

- National and state legislative changes, such as the passage of the Prison Rape Elimination Act (PREA).
- Changes in correctional best practices including reduction of solitary confinement and introduction of more humane restrictive housing.
- System responses to serious incidents such as past assaults, murders, deaths, etc.,
- Increased litigation that impacts facility operational practices and staffing needs.
- Changes in local collective bargaining agreements that impact staffing needs.
- Improvements in correctional supervision practices, such as the implementation of direct supervision.
- Implementation of programs and services targeted to unique inmate populations.
- Increased efforts to conduct risk/needs assessments of incarcerated individuals upon entry so that appropriate treatment regimens can be developed.

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2 US Department of Justice, Office of Justice Programs, Bureau of Justice Statistics report “Correctional Populations in the United States, 1993”
• Increased effort to prepare incarcerated individuals for reentry into the community.

• Increased expectations regarding the development and implementation of enhanced treatment practices for those in need of mental health services or substance abuse and sex offender treatment.

• Changes in inmate population characteristics including increasing number of geriatric inmates and those with serious mental health needs.

• Increased need for gender responsive supervision and treatment.

• Improvement in managing transgender incarcerated individuals.

During our on-site reviews we observed many examples of how the evolution of correctional operations have impacted staff workloads. A few of the more recent changes include:

• Mental Health Observation: To ensure improved care of seriously mentally ill incarcerated individuals, the DOC has changed mental health observation practices for those inmates in crisis. This change has had a significant impact on staffing needs in several facilities.

• Public Access: To better control the potential for contraband entering the facility, the DOC has recently begun requiring the screening of all staff entering the facility. This change places increased demands on the public access posts.

• Off-Site Transports. The DOC’s aging population and increased legal requirements for medical care have significantly increased the need for off-site transports.

• Response to Serious Incidents: The DOC has not been immune to serious incidents. The brutal murder of correctional officer Jayme Biendl at the Monroe Correctional Complex in 2011 led to a number of policy and practice changes designed to increase staff security. These changes directly impacted the staffing needs at each facility and included:
  - The addition of “security specialist” positions at each facility,
  - Requiring two staff or open and close any work or program area,
  - The addition of communication officers on the 1st shift in standalone minimum-security facilities, and an additional 2nd shift booth officer for all medium custody housing units.

These are but a few of the factors we observed in Washington’s changing correctional environment that limited the accuracy of the existing staffing model. It is clear that today’s
correctional operations and practices are considerably more labor intensive, diverse and different than what was found in the 1990’s, when the model was developed. The consequence of the complex nature of modern correctional operations is that correctional facilities each have distinctive, individualized missions to meet the diversity of new requirements and enhanced inmate needs.

**Diversity of Operations Across Facilities:** Our review found a standardized staffing model in any form would be unable to account for the staffing needs that result from the multitude of unique characteristics and individuals served at each of the facilities. Past post audits conducted by DOC headquarters support this as there are a number of staffing adjustments made that fall outside the standards set in the model. In many of our on-site visits we attempted to compare the staff recommendations in the post audit to the staffing standards set in the model. In numerous cases we found exceptions to the standards that were made in an attempt to accommodate for the distinctive operations of the facilities.

The major reason that a standardized staffing model will lack validity is due to the diversity of operations across the facilities. The fact is that the model attempts to apply standards to something, that by nature, requires extensive customization. CGL’s on-site observations underscored the inherent diversity of DOC facilities and their unique staffing needs. A few examples of unique issues that affect staffing at individual facilities include

- **Monroe Correctional Complex:** Differing facility designs and sizes are contributing factors as to why a standardized model will fail to accurately identify staffing needs. Large facilities that have unique architecture, such as the Reformatory Unit at the Monroe Complex present unique features with regard to staffing. The original facility is an Auburn style design and was opened in 1910. Its housing has multiple tiers stacked upon one another and is unlike more modern facilities. Monroe also has three other facilities and an intensive management unit within the complex, all with separate perimeters. The facilities have expansive correctional industries buildings and warehouses that are difficult to supervise with the few staff prescribed by the model. Each of these facilities is unique and makes it difficult to use a standardized staffing scheme that doesn’t adjust for workload fluctuations impacted by the unique design.

- **Airway Heights Corrections Center:** Our on-site reviews at other facilities also demonstrated the difficulty in attempting to standardize staffing needs. For example, our visit to Airway Heights Corrections Center found an abundance of distinctive facility populations and missions:
  - Geriatric unit: The facility is the location for a unique unit that houses approximately 260 geriatric inmates who have more intensive medical and supervision needs.
- Major medical care: Airway Heights manages incarcerated individuals with serious medical issues. This includes over 50 cancer patients in need of off-site chemotherapy/radiation treatments. The staffing model does not accurately identify the number of staff needed to conduct the off-site hospital stays for this population. This unique population as well as other at Airway Heights contributes to its high number of extra post hours for off-site hospital stays. Figure 2 compares the number of extra post hours at all facilities during a recent 12-month period.

**Figure 2: Off-Site Hospital Watch & Watch Relief Extra Post Hours**

During a recent twelve-month period, Airway Height needed over 15,000 extra post hours just for off-site hospital watches and relief of staff assigned to those watches. Only the Monroe Correctional Complex had more extra post hours (28,285) dedicated to this need.

- Community corrections violator reception – The facility receives between 13 and 15 violators per week who are brought in off the streets with a host of unique supervision, medical and treatment needs.

- Safe Harbor facility – facility is designated as a safe harbor from gang intimidation. Inmates seeking to drop their gang affiliation are housed at the facility. This impacts the workload of custody and investigations staff.
- Transgender population - Airway Heights houses 29 transgender inmates mainstreamed in its population. This places increased workload on mental health and case management staff as well as increased supervision requirements on custody staff.

- Sex Offender Treatment Residential Unit – The facility operates a 132-bed sex offender treatment residential unit with unique programming and supervision needs.

- Correctional Industries – The expansive correctional industry program at Airway Heights has employed an average of 644 incarcerated individuals between July and December 2018, ranging from 621 in September to 668 in December. The program also employs 105 staff. While these programs are exceptional, they provide potential access to a significant amount of contraband. Because of this and the large physical space occupied by this program its security supervision needs are much more intensive than at other facilities with smaller industry programs, and the existing staffing model does not prescribe an appropriate number of custody posts to ensure the security of this area.

- Washington Correctional Center for Women: The Washington Correctional Center for Women is the only major women’s facility in the state and as a result has a variety of unique operational practices and programs that impact staff workload demands. Women’s facilities are unique in the types of programming offered and the workload needed to manage a female population. Overall our review found that a standardized custody staffing model could not account for the distinctive needs and services for this population. The unique characteristics of this facility include:
  - Multiple security levels: The facility operates a minimum camp and the main campus houses a variety of security levels including close and medium custody levels.
  - Gender specific supervision and programming: Women tend to be less violent than men; therefore, there is often a misconception that fewer security staff are needed. In fact, women’s facilities may need more custody staff, not less, given the differing roles they play in managing female offenders. For example,
    - Custody staff are often required to engage more frequently with women to deescalate relationship-driven issues.
    - Custody staff often play an important role in ensuring that women get the programs and services that they need. This may be especially true in
units, such as restricted housing, mental health, and intake, as women will have decreased access to outside support and relational contact (e.g., family, significant others, and children), which may in turn increase anxiety.

- Women tend to have more intensive programming needs than their male counterparts.

- Effectively managing a female population is substantially different than managing male incarcerated individuals. A large percentage of incarcerated women have a history of trauma, and their supervision and treatment options typically are more staff intensive. The Custody Staffing Model does not differentiate between male and female facilities. If a new custody model were to be developed for the DOC, a separate model would likely need to be developed for the women’s facilities.

- Public Access: Public access through the reception desk is intensive throughout the day due to the scale of programs offered and the sizeable number of volunteers (over 700) providing services.

- Therapeutic Community: The facility offers a residential substance abuse treatment program that impact staffing needs.

- Residential Parenting Program: Eligible incarcerated mothers are provided an opportunity to bond with their newborn infant and child in the facility in this distinctive residential program. A specific unit provides housing for mother and child and offers access to medical care, day care and other supportive services. This program impacts on-site staffing needs and significantly increases off-site medical transports and hospital stays for mothers and their children. The following figure provides a comparison of extra post hours for off-site hospital stays as well as the relief required for custody staff assuming those duties. To present a fair comparison between facilities by controlling for each facility population, we developed a rate of extra post hours per 100 inmates (average daily population).
The medical care and treatment needed for WCCW’s unique population medical needs is underscored by it having the highest need for extra post hours for hospital placements of any of the facilities. What is also apparent in the above figure is the wide variation between the extra post needs for hospital stays. This further highlights the fact that facility operations are unique and that a standardized staffing model would be unable to accurately prescribe staffing needs for such a diverse system.

- Yakama County Jail Overflow: Sixty incarcerated women are currently housed in overflow beds at the Yakima County Jail. This impacts staffing needs specific to provide oversight.

- Central Female Transportation Unit. The facility serves as the central transportation unit for all female transports in the state. It transports to and from county jails and the other female facilities.

- Bona Fide Occupational Qualification (BFOQ) specific posts. The facility has 110 BFOQ-Female posts established as a result of the Doe lawsuits.
Potential Higher Relief Factor: As noted by facility administration, the higher percentage of female custody employees (nearly 60%) may have an impact on the relief factor for the facility. Specifically, it was identified that female employees are more often the primary care giver in their households, and as a result, have a higher absence rate due to their care for their children and family members. This can have a direct impact on staffing needs.

- Washington State Penitentiary: The Washington State Penitentiary, serves a wide variety of incarcerated individuals and provides a significant diversity of population characteristics. One issue that has grown in complexity in recent years are enhanced services for crisis mental health treatment. CGL found Washington State Penitentiary had intensive staffing needs related to their high number of incarcerated individuals on close observation due to suicide potential. During our on-site visit we observed six concurrent constant observation watches requiring six custody staff. The facility noted they average nearly 20 shifts of overtime per day just to comply with close observation supervision policy. Data supports this. In FY2018, WSP incurred 11,386 hours of overtime related to special watches. Also, between November 2017 and October 2018, WSP had 15,925 extra post hours for suicide watches. This represented nearly one-half of all extra post hours for suicide watches in the DOC. The following figure controls for the population levels of each facility to better compare the number of extra post hours in a recent 12-month period dedicated to mental observation watches (15/30-minute checks) and suicide/intensive watches at facilities with an average daily population of over 500 incarcerated individuals.

The Washington State Penitentiary has significantly more extra post hours for mental health watches than any other facility. However, what is clear is there remains a significant variance in the custody staff needed across facilities for this specific work requirement. This wide disparity in staffing needs between facilities contributes to the ineffectiveness of a standardized model.
Figure 4: Mental Health Watch Extra Post Hours per 100 ADP

- Washington State Correctional Center: The Washington Correctional Center primary mission as a reception center for males creates staffing demands that are not present at the other male facilities in the system. Specifically, their staff demands are partially tied to the turnover of approximately 2,000 incarcerated individuals per month, which affects the level of custody and non-custody staff workloads including in the areas of transportation, housing, classification and medical/mental health.

Figure 5 compares the number of extra post hours created for transportation needs in a recent 12-month period.
In total the facilities needed over 50,000 extra post hours to accommodate their increasing transportation needs. The Washington State Penitentiary had the greatest extra post transportation needs (14,417 hours) due to both their more remote location and the number and type of individuals they incarcerate. The Washington Correctional Center (WCC) had the second highest extra post hours for this category. Overall, seven of the twelve facilities had over 3,500 transportation related extra post hours during this 12-month period.

When controlling for facility population size, the analysis changes. Figure 6 provides a breakdown of extra post hours by facility for every 100 incarcerated individuals.
When adjusting for population size the two reception centers rank first and third in the number of extra post hours established for transportation needs. The Washington State Penitentiary has the second highest amount. Overall, there is a wide variation in the extra post hours create for transportation needs. Among the larger capacity facilities (not including Cedar Creek, Larch, and Mission Creek) Coyote Ridge ranks the lowest with 152 hours for every 100 incarcerated individuals, while WCCW is nearly four times greater with 616 hours for every 100 incarcerated individuals. This disparity again underscores the ultimate difficulty in attempting to standardize staffing levels across disparate facilities.

**Staffing Model Validity**

Although the existing staffing model attempts to recognizes that variations can take place, it falls short because of the sophistication of the system and the unique and distinct mission and operating needs of each facility. As the correctional system evolved and became more sophisticated the demand for resources grew faster than resources could be provided.

Attempting to develop a standardized staffing model in today’s diverse correctional facilities is appealing in theory but has serious limitations. Any staffing standards developed would require an inordinate number of variations or exceptions to the standards to adjust for the unique characteristics and populations of each facility. As these exceptions to the model grow, the ability to maintain “standardization” of staffing levels would seriously diminish. As a result, the validity of any staffing model would be very limited.

Additionally, any staffing model could not be static and would need regularly updated to allow for continuous changes as systems evolve.

**Finding:** The diversity of facility operations in a modern correctional system do not support the ability to “standardize” staffing across facilities.

**Critical Areas Where Model Does Not Identify Actual Staffing Needs**

One strong indicator of the inability to develop a standardized model to accurately prescribe the staffing needs of a correctional system can be found in specific areas where the current model fails to accurately identify the number of staff needed. While this clearly shows the shortcomings of the current model, it also demonstrates how unique facility missions create unequal staff workload demands across facilities. CGL found a number of areas where the staffing model critically under-prescribes the number of custody staff needed.

In these areas we observed the understaffing negatively impacted overall facility operations and drove the creation of extra posts and overtime. Many of these areas have already been
identified earlier in the report, however, in this section we will provide more detail as to the impact this understaffing has on facility operations and the care and custody of incarcerated individuals.

The major areas where critical staffing shortages existed include:

- Transportation
- Supervision in Community Hospitals
- Close Observation/Suicide Watch
- Public Access
- Housing Special Populations
- Shift Sergeant Positions
- Unique Shift Schedule/Staff Supervision
- Correctional Industries Security Coverage
- Temporary Reassignments
- Program/Recreation Supervision
- Response and Movement Posts

**Transportation:** The most significant area where understaffing exists is off-site transportation. We note that off-site transports are variable and can be difficult to predict in advance. Transportation teams are assigned at each of the facilities to transport inmates for a variety of needs including medical treatment/services, or to other correctional facilities or court. While we found a significant variation in transport needs at each facility, our observations found that at every facility visited, the number of transportation teams allowed by the model was less than the number needed.

The fact that the model fails to accurately prescribe transportation staffing needs can have a serious impact on facility operations. Our observed results of transportation staff shortage included the following:

- Excessive overtime and extra post establishment to meet transport needs:
- Closing of other posts to accommodate transport needs.
- Closing of program activities to divert custody staff to transport functions.
• Delays in scheduling incarcerated individuals for off-site consults that can result in medical staff triaging cases and prioritizing off-site those who should receive treatment.

From a medical perspective this staffing shortage can impact offender care. We found the lack of transport staff has contributed to excessive backlogs of off-site medical consults and treatment procedures at several facilities. For example, at Airway Heights the lack of available staff to provide for medical transportation to local community services resulted in an extensive three-month backlog of inmates awaiting medical appointments. In a few cases the backlog was caused by the lack of available services in the community, but the majority of the delays were caused by lack of transportation staff to transport the inmates to the appointments. Similarly, the staff at Monroe Complex indicated that they also had to prioritize treatment for inmates based on the severity of the condition. Our review of medical off-site consults also found a significant backlog at the Washington Correctional Center.

One result of this lack of transport staff is found in the need to create extra posts and generate additional overtime. There were 4,955 extra post hours and 2,954 hours of overtime for medical transports alone at Airway Heights over a recent 12-month period. The Monroe Correctional Complex incurred 4,964 extra post hours for medical transport during this same time frame. Department wide extra post hours for medical transportation between November 2017 and October 2018 was 33,762 hours, in addition to the hours provided by staff assigned to manage transportation.

Supervision of Inmates in Community Hospitals: Another area where application of the staffing model creates critical staff shortages is in the supervision of incarcerated individuals admitted to community hospitals. Officers must provide security in community hospitals with a minimum of one officer for each inmate, or two if the inmate is considered a security risk. There may be one or two posts available on the roster for these duties, but an increase in hospital admissions often results in the hiring of overtime staff to cover the duties. Furthermore, a recent bargaining unit ruling requires that each officer assigned to supervise an individual in community hospital must receive a 10-minute break, twice per shift. Staff from the facility travel to the community hospital to offer the mandatory breaks. This can be expensive in facilities that are at considerable distance from the community hospital because travel time needs to be factored into the relief schedule. Coyote Ridge reported that due to the distance, any admission to the hospital results in the need for 2 posts, one to provide continuous supervision of the offender and the other to provide break coverage.

Generally speaking, these workloads needs vary by facility based on their medical missions and cannot be comprehensively addressed in a standardized model. As noted earlier in Figure 6, the variance of extra post hours for hospital stays ranges from a low of 137 hours
per 100 inmates at Clallam Bay, to 1,200 per inmate at WCCW. During a recent 12-month period there were over 89,000 hours of extra posts coverage for hospital supervision and hospital relief. Of that total, 36 percent (32,000 hours) were the result of the recently established need to provide relief.

Close Observation/Suicide Watches: It becomes more difficult to determine staffing at posts where the workload fluctuates daily and across facilities. Those facilities with a higher population of offenders with serious mental health needs are often deluged with supervision requirement for those individuals on observation and suicide watches. Additional escorts and fixed posts providing supervision in a medical infirmary may be necessary when there are additional medical appointments that need to be managed or close observation is required for inmates exhibiting suicidal tendencies or mental illness. Earlier in this report we noted staffing demands related to suicide observations at the Washington State Penitentiary. The same issue was found at other facilities. In a 12-month period from November 1, 2017 to October 31, 2018 at the Airway Heights Corrections Center, there were 8,239 hours of Suicide and Close Observation watches, a good portion of this caused the hiring of overtime. Overtime attributable to these watches was approximately 4,701 hours. Suicide watches at Coyote Ridge consumed 1,708 hours of extra post time over the same 12-month period. Other watches consumed 8,053 extra post hours. These watches at the Monroe facility for the same period incurred 6,807 hours of extra post assignments.

Public Access: The Public Access post is the security screening post that ensures that staff and visitors are authorized to enter the facility, and that they carry no contraband on their person. As identified earlier, the DOC has recently required all employees be screened prior to entering the secure perimeter of a facility. The Custody Staffing Model allows for Minimum Three (MI3) Medium and Close facilities to staff the main pedestrian entrance to the facility with one correctional officer on second and third shift. During the evenings or graveyard shift a post is not authorized. In multiple perimeter facilities, such as the Monroe Complex, there is only one Public Access post authorized. Due to activity levels of this post, it is often supplemented during busy periods with officers from other posts within the institution. For example, when visitation is taking place, staff assigned to the visiting room usually assist screening visitors.

Our observations indicated that this particular post is a critical element of the security program because of its importance in ensuring contraband does not enter the facility. However, the post is overburdened, due to their workload which not only is a function of the number of individuals entering the facility, but also their post duties which can include; answering telephones, answering visitor questions, reviewing identification and ensuring that those attempting to enter the institution have approved access, in addition to a host of other duties. It is apparent that the Custody Staffing Model does not allow for sufficient personnel
on these posts to carry out the safety and security duties that are important elements of the security program. At a minimum, an additional screener position to process visitors and staff through the magnetometer and x-ray should be considered. Also, at those facilities with multiple perimeters consideration should be given to adding a post at those ingress/egress points that visitors are processed through. It should be noted that the Public Access position is the first line of defense at pedestrian access points.

**Housing of Special Populations:** The existing staffing model appears not to be sensitive to special programs and unique special populations of a particular facility. Facility superintendents and staff that were interviewed were consistently critical of the model regarding this issue. Some examples follow.

At Airway Heights a DOC decision recently was made to utilize the segregation unit at the facility to house a transient violator population admitted directly from the community after failing to abide by their conditions of release. The result of that decision is that 15 to 20 admissions per week with an average daily population of 13 offenders are confined at the facility. These inmates often require detoxification, intensive mental health care and often have serious medical issues. Staffing of the segregation unit has not been adjusted to address the increase in workload resulting from this mission change.

The Monroe Complex is a sophisticated facility comprised of 16 male offender living units within four perimeters that contains the following housing areas:

- The Washington State Reformatory, a 720-bed Auburn-style housing unit
- 20-bed infirmary
- 364-bed Special Offender Unit
- 100-bed Intensive Management Unit
- 824-bed Twin Rivers Unit
- 480-bed Minimum Security Unit
- 17-bed close observation area

A number of special missions have been assigned to the facility that include housing a sex offender population, mental health population, a large industries operation, an intensive management unit, and a residential treatment unit. The facility also serves as a hub for inmates in need of medical services.
Staff at the facility have expressed concern that staffing resources are insufficient to manage the facility adequately. Specifically, concern was expressed that deficiencies exist in medical transportation, close observation watches, security in the correctional industries areas, public access, and the special offender unit. The number of available Response and Movement positions are limited, as they are often pulled from their duties to handle transportation issues and other assignments. The situation is exacerbated by high staff vacancy rate due to difficulty recruiting staff in this geographic location. Overtime and extra post hours are extremely high for this facility because of vacancies, as well as duties and functions that must be carried out that exceed available staff resources. A backlog exists of those inmates requiring outside medical services but have been unable to receive them because of the unavailability of transportation. This is an example of a facility that could benefit from an individualized staffing study that goes well beyond what a standardized staffing model can provide.

**Shift Sergeant Positions:** The existing staffing model authorized one shift sergeant per shift. At the larger facilities, one shift sergeant is authorized within each perimeter. Additional sergeants are authorized for specialty functions such as property, mail, visiting, armory, hospital, tool control, key control and industry zone. In minimum-security facilities, sergeants are authorized to supervise work crews if the facility has five or more off-site crews in operation. The living units utilize a modified unit management approach which authorizes five-day sergeants on two shifts. In order to ensure seven-day coverage, the living unit sergeants have alternating days off so that there is at least one sergeant available 16 hours a day to cover the living units. When there is no living unit sergeant available, the shift sergeant is responsible for all operations including the living units. This is an area where a staffing analysis should be considered to address supervisory practices. There are times when the shift sergeant is managing institutional operations as well as unscheduled transportation that must be arranged along with other duties consistent with the supervisor role. It appears likely from our observations and conversations with management staff that adjustments should be made to ensure increased supervision that meets the workload demands.

**Unique Shift Schedule/Staff Supervision:** Another example of the existing staffing model not addressing special circumstances is the shift schedule at Coyote Ridge Correctional Facility. Coyote Ridge has a number of alternative shift schedules, which includes a 12-hour shift in the MI3 units. The correctional officers on these shifts often do not have the benefit of supervision because the sergeants, who are the first line supervisors, do not work 12-hour shifts. Therefore, there are regular times when the correctional officers aren’t receiving direct supervision and don’t have contact with a unit sergeant. This issue calls into question the current deployment schedule for sergeants. This is an area where the Model isn’t adequate to address supervision of these officers because of unique circumstances.
Correctional Industries Security Coverage: Washington has a very robust Correctional Industries program. Industries programs operate in large buildings, manufacturing products and providing services to state agencies. For example, at Airway Heights the industries buildings are expansive and security coverage by correctional officers is minimal (three posts). At the Monroe Complex, there are five posts overseeing the security of large industry areas in both the Reformatory Unit and the Twin Rivers Unit. Correction officers often must rely on industries personnel to supplement inmate supervision in these areas. These areas are laden with materials that can be fashioned into weapons and the proximity to the perimeter and numerous blind spots make these areas difficult to supervise with current staffing levels. This is an area where staffing adjustments should be considered, however, the existing model has not resulted in staffing adjustments to address these security concerns.

Temporary Reassignments: Temporary reassignments are significant portion of the extra post activity that takes place within the department. As noted above temporary reassignments resulted in 121,268 extra post hours, and this activity is not addressed in the Custody Staffing Model. The number of these assignments results in double-fills or the use of overtime to backfill for the reassigned employee. Reassignments occur for a number of different reasons including employee investigations into misconduct, FTE double fills, long-term absences of employees (including military leave), special projects, light-duty assignments for those employees that can only work on limited assignments due to injury and supervising construction workers involved in capital projects. The extra post hours associated with these assignments are substantial and should be examined in an individualized staffing analysis to determine if permanent post should be established for the various functions.

Program/Recreation Supervision: The Department has invested significant resources in rehabilitative programming and has a high level of volunteer services at most of its institutions. Department facilities contain one or more program buildings where educational and recreational services take place, as well as avocations and religious activity. Correctional officers are assigned to these buildings to maintain a count of the participants and to provide security as inmates interact with program staff and volunteers. At a number of the facilities we visited there were insufficient correctional officer coverage to allow for programs to operate with extended hours. As staff are drawn to other missions, often program activities take a backseat to transportation, security watches, etc. The same problem was reported as it relates to recreation staff. It was reported that the number of recreation specialists has been reduced over time due to budget issues and current staffing is insufficient to address the workload. This is an area where an individualized staff analysis could benefit DOC in order to identify specific needs at each facility.
Response and Movement Posts: Response and Movement Posts (R&M) are responsible for supervising yard activities and are first responders to address inmate misconduct and critical incidents. The Model calls for one post, 16-hours per day, seven days per week per housing unit. That number is reduced by half during the evening or graveyard shift. Staffing at this level appears appropriate given R&M needs at most facilities. However, the problem we observed regarding R&M posts was that they are, by default, the posts most pulled to be assigned to other duties, and this reduces the availability of R&M staff to perform their primary functions. For example, frequently inmates are required to receive medical services in the community for emergency care. At one facility we were informed that on the third shift it is not unusual to have the R&M staff reduced by half to address temporary reassignments for unscheduled activity. Because this concern was presented at multiple facilities, a task analysis is in order to review what functions are causing these reassignments to determine if pulling these officers off their posts can be reduced to ensure proper security coverage in the institution.

Recommendations

The complexity, diversity and specialized nature of DOC’s facilities results in the inability to develop a custody staffing model that would have any standardization across the facilities. If one were to be developed, it would lack reliability and validity because it would be unable to accurately measure what it is intended to measure -the number of custody staff needed. Consistent with what is found in other states, national best practices support an exercise that has proven itself to yield accurate staffing recommendations for facilities with diverse operations.

To improve the accuracy in the development of custody staffing needs, the DOC should conduct individualized staffing assessments at each of its correctional facilities.

Individual staffing studies could be conducted in a process that results in the determination of a definitive custody staffing level and baseline staffing model for each facility. The specific tasks to be completed would include:

Department-Wide Tasks:

- Interview key stakeholder to understand the following:
  - Unique characteristics of the agency including:
    - Organizational Chart
    - Classification system
    - Individual facility missions
• Key operational practices
• Recent and planned department initiatives
• Service delivery methods for major functions such as food, medical, mental health and programs.
• Factors driving overall agency staffing needs
• Other internal and external factors driving department staffing needs.
• Budget system and process
  • Review and evaluate personnel, security, programs and other staffing-related policies
  • Review past incidents/issues that resulted in policy changes that affected staff workloads.
  • Evaluate any current or past court orders/consent decrees that guide agency practices.

**Facility Specific Tasks:**

• Interview facility administration and key department leadership.
• Identify facility mission and how it “fits” within overall agency. This will include:
  o The scope of its functions (general population, special populations, reception, etc.)
  o Facilities designed security level
  o Number and type of individuals housed
  o Unique programs, services and operations.
  o General staff deployment practices and issues.
• Understand the facility layout and how it may impact facility staffing needs.
• Review past critical incidents
• Review housing layout and construction.
• Review operational practices
  o Daily schedule of activities
- Program schedules and locations
  - Schedules and access to services such as medical, mental health, meals, visitation, etc.

- Conduct detailed interviews with facility staffing coordinators to understand current staff deployment practices and where staffing gaps exist.
- Review and understand post orders
- Evaluate extra post hours and overtime usage for past year as.
- Assess daily roster schedules for all shifts.
- Tour facility to observe posts and interview staff on assignment.
- Conduct a post-by-post analysis of each operating post, identifying the duties and frequency with which the post is filled.
- Identify gaps between existing staff deployment and current needs.
- Develop a new post analysis that takes into account contemporary correctional operations, unique facility missions and the characteristics of the current population.
- Develop a detailed relief factor (or apply agency-wide relief factor) to new post analysis to determine the number of FTEs needed.
- Apply the relief factor to the post analysis to identify FTEs by position classification needed.

Once completed, a detailed report will present a staffing assessment/current staffing model for each institution. This model will identify the number of FTEs needed for the facility to meet its current mission, given the distinctive characteristics of the facility, its existing incarcerated population and level of programs and services it provides. This will serve as the baseline for the facility’s staffing needs. When future changes to the facility population, mission or programs and services occur, DOC would then submit requests for variations to this baseline that are justified by these operational changes.

Because staffing models will be tailored to each individual facility, it won’t result in the same issues that burden the current standardized staffing model that attempts to standardize staffing across 12 unique and disparate institutions and will therefore provide a much more accurate assessment of actual staffing needs of each facility.
After the initial staffing assessment is completed at each institution, the DOC should update staffing assessments at least every three years, or sooner if a mission or policy change is implemented that would have a substantial impact on staffing.
Non-Custody Staffing Model

DOC staff developed the Non-Custody Staffing Model (NCSM) in the early 1990s to provide an internal guide for facility staffing in functional areas outside of security. The Model consists of a set of simple workload standards, which as applied to specific job classes, provides a calculation of staffing needs in each program area. This contrasts with the more complex Custody Staffing Model, which uses variables such as facility security level, staff relief factor, and post supervision requirements to guide a dynamic audit process which then defines facility custody staffing requirements. The NCSM has not been revised since its initial development. Unlike the Custody Staffing Model, the state legislature has never explicitly recognized the NCSM as a guiding factor in establishing facility staffing levels. The NCSM has served more as an internal DOC guide for determining non-custody staffing needs.

Functional areas covered by the NCSM include Administration, Food Service, Plant Maintenance, Recreation, Records, Unit Operations, Intelligence, and other support functions. Prominent functional areas not covered by the Model include staffing for Health Care, Information Technology, Education, Reentry Programming, Payroll, Warehouse Operations, Personnel Management, Purchasing, and Financial Reporting.

The core assumption that underlies the use of a model-driven approach to facility staffing plan development is that all facilities operate in essentially the same manner, with similar policies, practices, physical plants, and programs apart from a few qualifying factors. This perspective assumes the key differentiator in facility staffing needs, and the fundamental driver of staff workload levels is the size of the facility inmate population. Consistent with this approach, the Department has categorized its 12 facilities by size and complexity as follows:

**Table 13: Washington Department of Corrections Facility Categories**

<table>
<thead>
<tr>
<th>Stand-Alone Minimum Security Facilities</th>
<th>Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cedar Creek CC</td>
<td>480</td>
</tr>
<tr>
<td>Larch CC</td>
<td>480</td>
</tr>
<tr>
<td>Mission Creek CC for Women</td>
<td>304</td>
</tr>
<tr>
<td>Olympic CC</td>
<td>381</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mid-Size Major Facilities</th>
<th>Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington CC for Women</td>
<td>874</td>
</tr>
<tr>
<td>Clallam Bay CC</td>
<td>900</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Large Major Facilities</th>
<th>Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airway Heights CC</td>
<td>2,174</td>
</tr>
<tr>
<td>Coyote Ridge CC</td>
<td>2,528</td>
</tr>
<tr>
<td>Stafford Creek CC</td>
<td>1,970</td>
</tr>
<tr>
<td>Complexes</td>
<td>Capacity</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>Washington CC</td>
<td>1,518</td>
</tr>
<tr>
<td>Monroe Correctional Complex</td>
<td>2,488</td>
</tr>
<tr>
<td>Washington State Penitentiary</td>
<td>2,601</td>
</tr>
</tbody>
</table>

The NCSM largely relies upon these categories and facility inmate population levels to guide staffing requirements in the different functional areas covered by the model. The following NCSM standards provide representative examples of this approach:

- Warehouse Operator 2: 0.5 FTE per facility under 500 offenders; 1 FTE per 500-2,000 offenders; and 2 FTE for facilities with over 2,000 offenders.

- Recreation Athletic Specialist 3: 2 per large major; 1 per mid-size major; 1 per stand-alone minimum; and 1 per perimeter for complexes.

In some instances, the standards also reference the custody level of the population. For example, the standard for Correctional Specialist 3 (Hearings Officers) is 1 per major facility with an additional FTE for facilities with over 2,000 offenders and a close/max custody unit.

**NCSM Standards Analysis**

As noted in the Custody Staffing Model Report, Washington is the only state correctional system that has attempted to develop a standardized model to determine required levels of facility security staff. The standard practice in other state, local, and federal systems is to assess custody staffing needs on a facility by facility basis. In contrast to the use of a staffing model, this approach explicitly considers the many specific, unique institutional characteristics that affect custody staffing requirements and therefore results in a more valid, accurate determination of staffing needs. Our review documented numerous instances where the Custody Staffing Model did not consider the complexity, diversity, and specialized nature of the DOC’s facilities. The key recommendation of the Report proposed that the DOC move away from a standardized model process and instead conduct individualized custody staffing assessments at each of its correctional facilities.

One of the primary factors complicating custody staffing analyses is that correctional officers are responsible for a wide variety of disparate duties, including assignments such as housing unit supervision, inmate escort, perimeter patrol, security screening, and suicide watch for example. The performance of these duties is in turn impacted by offender population characteristics, physical plant, and facility mission. The resulting complexity of the analysis is best conducted on an individual facility basis to fairly account for each facility’s unique characteristics.
In contrast, many of the non-custody assignments included in the NCSM have very specific duties that do not vary by facility. The responsibilities of a Superintendent or a Roster Manager for example are essentially consistent across all facilities. Staffing for positions such as these can be readily standardized, with allowances made for facility size and/or complexity.

Most states define standards or requirements for staffing such duties in department policy. The department’s policies on administration and organization often define the positions that may perform as CAO in facilities of different types or sizes, as well as the number assistant administrators provided. Similarly, department PREA policies will typically indicate facility staffing requirements in support of the program. Washington’s approach to compile these staffing requirements into a single non-custody staffing model is unique in form, but is consistent with the basic, workload/standards-based approach that most correctional systems use to determine certain categories of staffing needs.

**Finding:** The DOC’s use of uniform workload standards to define non-custody staffing requirements is generally consistent with the approach of other state correctional systems.

Because the type of job assignments included in the NCSM vary substantially, this analysis examines workload standards for programs and job classes in the following functional categories: Administration, Custody Support, Inmate Management, Programs, and Support Services. This allows for generalized assessment of the utility of the model by the type of work performed.

*Administration.* The specific NCSM workload standards for senior administrative positions largely reflect industry-standard practices for correctional facility management. Superintendent A positions are established to administer major facilities, while Superintendent B positions administer smaller, stand-alone minimum security facilities. The number of Associate Superintendents is set at 2 for each major facility, with an additional Associate assigned to those facilities with population levels in excess of 2,000 inmates that also house close custody/max inmates. The number of Correctional Program Managers is set at 1 for facilities under 1,000 inmates and 2 for facilities with population levels above that threshold.

**Finding:** NCSM standards for senior administrative staffing are consistent with staffing practices in other state correctional systems and provide appropriate guidance in determining management staffing needs.
Table 14: Administration Workload Standards

<table>
<thead>
<tr>
<th>Program</th>
<th>Job Class</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration</td>
<td>Superintendent A</td>
<td>1 per major facility</td>
</tr>
<tr>
<td></td>
<td>Superintendent B</td>
<td>1 per stand-alone minimum or in addition to Supt A with Asst. Secretary's</td>
</tr>
<tr>
<td></td>
<td>Associate Superintendent</td>
<td>2 per major facility; add 1 over 2000 offenders with close/max custody</td>
</tr>
<tr>
<td>Program Management</td>
<td>Correctional Program Manager</td>
<td>1 per facility; add 1 for over 1000 offenders</td>
</tr>
</tbody>
</table>

Custody Support. NCSM workload standards for custody support functions address roster management, investigations, training, and other facility security/safety positions not filled by correctional officers. The standards establish one roster manager per facility and one training coordinator for each major facility. Facilities with over 500 offenders require an investigator 3, while large facilities or those with significant close custody populations will also have an Investigator 2. Each stand-alone minimum security facility has one security specialist, while major facilities receive one security specialist for each captain on the roster.

Finding: Workload standards for custody support assignments appear adequate and are generally consistent with accepted operational practices in other state correctional systems.

Table 15: Custody Support Workload Standards

<table>
<thead>
<tr>
<th>Program</th>
<th>Job Class</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>Intelligence &amp; Investigations</td>
<td>Investigator 3</td>
<td>1 per facility over 500 offenders</td>
</tr>
<tr>
<td></td>
<td>Investigator 2</td>
<td>1 per facility over 1,500 offenders; or large close custody population</td>
</tr>
<tr>
<td>Prison Safety &amp; Security</td>
<td>Corrections Specialist 2 (Security Spec.)</td>
<td>1 per facility Captain; 1 per stand-alone minimum</td>
</tr>
<tr>
<td>Roster</td>
<td>Corrections Specialist</td>
<td>1 per facility. Corrections Specialist 3 over 180 custody staff; Corrections Specialist 1 with 180 or less custody staff</td>
</tr>
<tr>
<td>Training</td>
<td>Corrections Specialist 2</td>
<td>1 per major facility; .5 per stand-alone minimum</td>
</tr>
<tr>
<td></td>
<td>HR Consultant Asst 2</td>
<td>1 per major facility</td>
</tr>
</tbody>
</table>

Inmate Management. Assignments in this area cover disciplinary, PREA, records, and unit management responsibilities. The standards specify assignment of staff in each facility, contingent on offender population levels, to support these functions. The standards also assign one PREA coordinator at each major facility; and designate one unit manager for each facility housing unit. Our review indicates that the PREA manager position at each facility is not funded, even though it is included in the NCSM. Facilities have had to divert funding from other non-custody positions to establish the PREA position. We were informed that PREA has increased the workload related to investigations of PREA incidents. In many facilities the
investigators have taken on these extra duties, while in some other we found programs staff or shift lieutenants involved in PREA investigations. The bulk of these investigations should be the responsibility of a funded PREA manager.

The standards for these specific functions are generally consistent with staffing guidelines for these assignments used in other state correctional systems.

Finding: NCSM standards for job classifications in Intelligence & Investigations, Prison Safety and Security, Roster, and Training are appropriate and consistent with projected workloads.

This functional area also includes counseling staff (Classification Counselor 2 and 3). The standards established in the NCSM relate directly to caseload size and classification as summarized below:

<table>
<thead>
<tr>
<th>Population Classification</th>
<th>Counselor/Inmate Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>IMU</td>
<td>1:65</td>
</tr>
<tr>
<td>Close Custody</td>
<td>1:80</td>
</tr>
<tr>
<td>Medium Security</td>
<td>1:65</td>
</tr>
<tr>
<td>Minimum Security</td>
<td>1:50</td>
</tr>
<tr>
<td>Reception</td>
<td>1:40</td>
</tr>
</tbody>
</table>

The Department has calculated that based on the 2016 Capacity Needs Assessment Model, these ratios indicate current funded staffing levels produce a shortfall of 13 counselors for male offenders and 1.5 counselors for female offenders in FY 2019.

As a general principle, correctional systems have not established specific staffing standards for correctional counselors in a prison setting. Our reviews of correctional system staffing practices have found wide variations in the number of inmates assigned to each counselor. Staffing for counselor positions is typically dependent upon several local factors including:

- Agency goals;
- Agency budget limitations;
- Type of facility;
- Needs of specific inmate population;
- Past litigation decisions;
- Level of overall treatment staffing available including counselors, social workers, mental health staff, volunteers, etc.
American Correctional Association (ACA) standards reflect the fact that there is no prescribed counselor to inmate ratio. Specific counseling standards include:

- **4-4433**: A planned organized counseling program is provided by persons qualified by either formal education or training.

- **4-4434**: The institution has a formal mechanism to determine appropriate levels of social services staffing. The mechanism used to determine such staffing levels includes at a minimum:
  - Type of inmate population served
  - Type of institution
  - Legal requirements
  - Goals to be accomplished

The institutions use of a “team” approach and use of paraprofessionals, volunteers, and students may also influence the numbers of professional staff required.

- **4-4435**: Written policy, procedure, and practice provide that staff are available to counsel inmates upon request; provision is made for counseling and crisis intervention services.

  Comment: Staff members should make time available, on a regularly scheduled basis, for appointments with inmates who request them. Treatment offerings should include group therapy and group and individual counseling. Because inmates may have problems that require immediate attention, at least one staff member should be available 24 hours a day. Crisis intervention services should be available on an as-needed basis to assist disturbed inmates.

ACA standards support variability in counselor levels based on a diversity of factors. Standard 4-4434 indicates that determining the number of social services positions needed should be determined on a facility-by-facility basis and is also needs to consider past litigation and the overall availability of social services staff (mental health, treatment, etc.). It also allows for volunteers and students to support social services needs in the facility.

The DOC standards for counselors included in the NCSM allow staffing variability by classification type to a limited degree, but do not address the specific needs of the inmate.

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population served in those custody levels, nor legal requirements or the increasing treatment goals established by the DOC.

In the past 20 years, increased societal expectations and litigation outcomes have placed greater demands on the need to provide programs and services to both the general population and to targeted populations with specific needs. We found this evident in DOC facilities. For example, Airway Heights is a national leader in mainstreaming transgender inmates into their general population. While this is an exemplary practice, it places increased workload demands on counselors and treatment staff that cannot be accounted for in a standardized model. Similarly, the Residential Parenting Program at the Washington Correctional Center for Women reflects best practices by supporting mother-child bonding for incarcerated women, but also places additional workload requirements on staff that cannot be reflected in any standardized model. Additionally, across the system, the Prison Rape Elimination Act (PREA) has increased staff workload as in many facilities classification counselors are assigned collateral duties to investigate PREA complaints.

Finally, counseling needs are generally more intensive for female offenders than their male counterparts. Women typically have greater needs related to both attending and processing programming and trauma that requires additional staff time and supervision.

Designating counselor staffing levels to meet workload demands requires a detailed understanding of the very specific factors that make up counselor job duties. Because these factors can differ substantially across facilities, the use of a standardized model will not accurately reflect actual staffing needs. Accordingly, we recommend that counseling staffing levels be determined on a facility-by-facility basis, following a detailed analysis of factors driving counselor workload in each facility.

Finding: No single staffing model can accurately prescribe counselor staffing across the diversity of facility missions and inmate needs in the DOC system.

Recommendation: Counselor staffing should be assessed on a facility basis.

This functional area also includes Records Office workload standards. The NCSM identifies the following workload standards in determining records staffing needs:

- **Records Management Supervisor**: 1 position for a reception center or for a large major facility.

- **Corrections Records Supervisor**: 1 position per mid-size major and standalone minimum.

- **Corrections Records Technician/Corrections Records Technician Lead**: 1 position.
- 1 technician for 400 or fewer offenders
- 1 additional technician for every increment of 250 offenders over 400
- 1 additional technician for reception center
- Every 6th technician position will be allocated as a Corrections Records Technician Lead

Responsibilities assumed by records office staff include:

- Conducting sentence calculations
- Developing and maintaining the inmate central master record file
- Verifying sentence credits.
- Serving legal documents on offenders.
- Entering information into the offender management system
- Working with courts to schedule offender transports for court appearances
- Interpreting/clarifying court decisions

The amount of work associated with these responsibilities will vary depending upon the nature of the inmate population, the sophistication of the technology used to manage data, and the mission of the facility. The efficiency of workload management will similarly vary in relation to the experience/productivity of line staff, policies, management expertise, and technology utilization. This variability in responsibilities across records offices creates difficulties in establishing a standardized staffing pattern. Accordingly, as with counselors, most correctional systems do not use fixed workload indicators to establish records office staffing levels. Instead, the more common practice is to rely on assessment of individual facility record office performance, issues, and efficiency in establishing staffing levels.

We note that the Washington DOC has incurred some high-profile issues with sentence computation that resulted in the early release of some offenders. This issue led to creation of a team of staff responsible for manually verifying sentence calculations which has increased records office workloads at certain facilities. Additionally, there has been some discussion concerning centralizing sentence calculations which could reduce records staffing needs in the facilities. Another factor that will impact records office staffing needs is the continued efforts by correctional systems to move to a fully electronic inmate central file system. States such as Ohio, Iowa and Oklahoma have implemented electronic systems that reduce or eliminate the workload needs concerning maintaining a paper filing system.
The complex array of factors that drive workload in this area, as well as ongoing changes in management approach does not support the use of a standardized model to determine staffing needs in this area.

**Finding:** The variability and evolution of workload demands in the records function do not support the use of a standardized staffing model for the system.

**Table 17: Inmate Management Workload Standards**

<table>
<thead>
<tr>
<th>Program</th>
<th>Job Class</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>PREA</td>
<td>Corrections Specialist 2</td>
<td>1 per major facility</td>
</tr>
<tr>
<td>Grievance</td>
<td>Corrections Specialist 2</td>
<td>.5 per facility less than 500 offenders; add .5 each full increment of 500 over 500; add .5 each max unit</td>
</tr>
<tr>
<td>Hearings</td>
<td>Corrections Specialist 3</td>
<td>1 per major facility; add 1 over 2000 offenders with close/max custody</td>
</tr>
<tr>
<td>Unit Operations</td>
<td>Correctional Unit Supervisor</td>
<td>1 per housing unit including IMU and Seg (excludes mental health units)</td>
</tr>
<tr>
<td></td>
<td>Corrections Mental Health Unit Supervisor</td>
<td>1 per mental health housing unit (MCC SOU &amp; WSP BAR Units)</td>
</tr>
<tr>
<td>Records</td>
<td>Records Management Supervisor</td>
<td>1 per Reception Center; 1 per large major</td>
</tr>
<tr>
<td></td>
<td>Corrections Records Supervisor</td>
<td>1 per mid-size major and stand-alone minimum</td>
</tr>
<tr>
<td></td>
<td>Corrections Records Tech/Lead</td>
<td>1 Tech for 400 or less offenders; add 1 each increment of 250 over 400; add 1 for Reception; Allocate each 6th position as Lead</td>
</tr>
</tbody>
</table>

**Programs.** The NCSM provide workload standards for just three areas of responsibility in program staffing, establishing a requirement for one Community Resource Coordinator and one Chaplain per facility, and pegging the number of recreation staff to the size category of facility. These standards appear reasonable.

The NCSM however, does not address staffing requirements for the wide array of programs available in DOC facilities. As of December 2016, the Department offered over 80 distinct programs in the areas of Family & Relationships; Learning & Working; Religious, Spiritual, & Cultural; and Therapeutic and Support. In WCCW, a residential parenting program has been established that allows pregnant female offenders to keep their babies with them after giving birth. In addition, the Department provides Reentry programming and an extensive Correctional Industries program. Many of these programs have been developed since the creation of the NCSM and were not contemplated in the model’s original design.

**Finding:** NCSM workload standards for programs address only a very narrow range of the inmate programs supported by the Department.
Moreover, many programs are now provided to segments of the inmate population which have been under-served in the past and which require customization to address specific population or facility characteristics. The introduction of gender-responsive programs and the delivery of program services to the restrictive custody population are examples of the increased specialization of program service delivery to address specific offender needs.

Facilities also do not all offer the same standard array of programs in the same format. The specific programs offered, as well as their design and delivery may be modified to address the unique characteristics of individual facilities. The approach to staffing these programs also varies, as program services may be provided by a combination of DOC staff, contractors, and volunteers that may vary in relation to the needs and resources available to a facility. Finally, program size or the number of inmates that may participate in an institutional program is often scalable at the discretion of facility managers, depending upon the interest in the program and resource availability.

The sheer number and diversity of these programs make it unlikely that a standardized model could effectively support program staffing decisions. A standardized model assumes that facilities of comparable size should require consistent levels of staffing across programs to provide equivalent levels of service. The fact however, is that program size and staffing can vary greatly by facility depending upon the needs of the inmate population specific to that facility, the availability of program space in the facility, the custody level of the facility, the availability of technology, and the level of resources available to support the program.

Finding: Use of a standardized model is not an effective approach to determining facility program staffing needs.

By far the most common approach for development of programs and associated staffing requirements in state correctional systems is on a facility basis, consistent with the specific needs, resource availability, and skill sets available at a given institution. The approach is typically “bottom-up,” with facility staff working in collaboration with central office staff to design and implement programs that conform with accepted formats within the context of unique local needs and resources. This approach results in closer alignment between facility needs and characteristics, and the program services provided. Use of a standardized model to determine staffing for the entire range of programs offered by the DOC is not advisable.

Recommendation: Program service staffing needs should be evaluated on a facility basis.
Table 18: Program Staffing Workload Standards

<table>
<thead>
<tr>
<th>Program</th>
<th>Job Class</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Resource Coordinator</td>
<td>Corrections Specialist</td>
<td>1 per facility</td>
</tr>
<tr>
<td>Religious Services</td>
<td>Chaplain</td>
<td>1 per facility</td>
</tr>
<tr>
<td>Recreation</td>
<td>Rec Athletic Specialist 4</td>
<td>1 per major facility</td>
</tr>
<tr>
<td></td>
<td>Rec Athletic Specialist 3</td>
<td>2 per large major; 1 per mid-size major; 1 per standalone minimum (Exception-Complex - 1 per perimeter)</td>
</tr>
</tbody>
</table>

Support Services. The NCSM establishes workload standards for a broad range of facility support services, including Clothing (0.5 Warehouse Operator 2 per facility under 500 offenders; 1 for facilities with 500-2,000 offenders; and 2 for facilities with over 2,000 offenders), Support (1 AA3 per large major facility for each 80 persons served; 1 per mid-sized major facility for each 72 persons served; and 1 per minimum facility for every 62 persons served), and Mailroom (1 Mail Processing Drive per facility for each 600 persons served). Our review of facility operations indicated no issues with the standards in these areas.

In the area of food service, the NCSM establishes management position standards of a Consolidated Food Manager for the large complexes, 1 Food Service Manager 5 per major facility, 1 Food Service Manger 3 per stand-alone minimum security facility, 1 Food Service Manager 3 for each major kitchen under the direction of a Consolidated Food Service Manager, and a Food Manager 1 or 2 at each major facility, depending upon the number of kitchens. These standards are appropriate.

The model also establishes Cook A/C staffing levels for minimum facilities (7 per stand-alone facility) and for each production function (storeroom, kitchen, and serving) in major facilities (not including the complexes, Airway Heights, Washington CC, and Coyote Ridge in which Correctional Industries manages food production). The storeroom function is staffed on an administrative shift schedule (8 hours per day/5 days per week) while the kitchen and serving functions have one position on both the AM and PM shifts daily.

The primary issue with these standards is the lack of relief for staff. As non-custody positions typically do not receive authorized overtime, the more common practice is to place off-duty staff in on-call status and rely on them to provide relief as needed. A better practice would be simply to recognize that the Cook AC positions perform functions that require staff coverage on an ongoing basis and establish a relief factor to provide the additional positions required to assure adequate coverage.
Finding: Cook AC positions perform functions with ongoing responsibilities that require relief to assure adequate coverage.

The seven facilities that use Cook AC staff have 65 authorized positions. Using the same methodology for relief factor calculation as employed for custody staff and leave data for Cook AC positions supplied by the Department, results in a 1.80 shift relief factor for 7-day assignments and 1.31 for 5-day assignments as shown below.

Table 19: Cook Relief Factor

<table>
<thead>
<tr>
<th>Total Days/Hours in Work Year</th>
<th>2,920 hours in year</th>
<th>Hours Remaining</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Regular days off</td>
<td>832</td>
<td>2,088</td>
</tr>
<tr>
<td>- Average Leave</td>
<td>326</td>
<td>1,762</td>
</tr>
<tr>
<td>- Average Training Time</td>
<td>40</td>
<td>1,722</td>
</tr>
<tr>
<td>Total Time Away from Assignment</td>
<td>1,248 Hours</td>
<td></td>
</tr>
<tr>
<td>Time Available to Fill Post (NAWH)</td>
<td>1,722 Hours</td>
<td></td>
</tr>
<tr>
<td>Holiday relief factor requirement</td>
<td>0.1</td>
<td></td>
</tr>
<tr>
<td>8-hour/5-day per week assignment</td>
<td>1.31</td>
<td></td>
</tr>
<tr>
<td>8-hour/7-day per week assignment</td>
<td>1.80</td>
<td></td>
</tr>
</tbody>
</table>

Applying these ratios to the standards in the NCSM for the seven facilities that use Cook AC staff results in a need for 11 additional positions, as shown below.

Table 20: Required Cook Staffing

<table>
<thead>
<tr>
<th># of Facilities</th>
<th>NCSM Standard</th>
<th>Relief Factor</th>
<th>Required Staffing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stand-Alone Minimum Facilities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cook AC</td>
<td>4</td>
<td>7 per facility</td>
<td>1.80</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Major Facilities</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Cook A/C - Store Room '</td>
<td>3</td>
<td>1 8/5</td>
<td>1.31</td>
</tr>
<tr>
<td>Cook A/C - Kitchen</td>
<td>3</td>
<td>1AM/1PM</td>
<td>1.80</td>
</tr>
<tr>
<td>Cook A/C - Serving</td>
<td>3</td>
<td>1AM/1PM</td>
<td>1.80</td>
</tr>
</tbody>
</table>

| Required Staff | 75.9 |
| Current Authorized Staff | 65.0 |
| Shortfall | 10.9 |

The NCSM also sets a series of specific standards for the facility plant operations and maintenance staff. The standards are generally keyed to facility size and category, with
additional increments of staffing if the age of the facility exceeds 25 years. In a few cases specific types of staffing based on the nature of the facility. For example, facilities that have power plants require stationary engineers. The standards established for each type of position are included in the next table which summarizes NCSM support staffing workload standards.

The number of qualifications applied to the standards for these positions represents a positive attempt to model the many different factors that go into physical plant management staffing. However, the fundamental premise of the model, basing staffing primarily on facility population is flawed. Department facility physical plants range widely in in terms of age, design, condition, and support needs. Physical plant staffing requirements are a function of facility conditions. Age and population level do not necessarily provide adequate guidance as to staffing requirements. A facility with a relatively small population level such as Cedar Ridge, may have many buildings dispersed across a large campus that requires substantial maintenance attention.

Finding: A standardized staffing model primarily based on facility population levels is not an effective means to establish physical plant management staffing.

Best practices in correctional facility maintenance dictate that staffing levels follow from a detailed assessment of current facility conditions. This assessment provides the basis for development of a remedial and preventative maintenance plan required to assure continued facility operation and preservation of critical facility infrastructure systems. The conditions assessment necessarily must be done on a facility by facility basis to capture the unique conditions and needs of each institution. This approach ensures that physical plant management staffing meets Department needs by addressing the unique, specific needs of each institution.

Recommendation: Establish physical plant maintenance staffing levels based upon a professional physical condition assessment review of each facility.

Table 21: Non-Custody Staffing Model: Support Service Workload Standards

<table>
<thead>
<tr>
<th>Program</th>
<th>Job Class</th>
<th>Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clothing</td>
<td>Warehouse Operator 2</td>
<td>.5 per facility under 500 offenders; 1 per 500-2,000; 2 over 2,000</td>
</tr>
<tr>
<td>Food Services</td>
<td>Food Service Manager 5</td>
<td>1 per major facility; Complexes with multiple perimeters-Consolidated Food Manager</td>
</tr>
<tr>
<td></td>
<td>Food Service Manager 3</td>
<td>1 per standalone minimum; 1 per major facility kitchen with Consolidated Food Manager</td>
</tr>
<tr>
<td></td>
<td>Food Manager 1 or 2</td>
<td>FSM1 at major facility with 1 kitchen; FSM2 at major facility each kitchen if</td>
</tr>
<tr>
<td>Program</td>
<td>Job Class</td>
<td>Standard</td>
</tr>
<tr>
<td>------------------</td>
<td>-----------------------------------------------</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>Cook A/C - Minimum</td>
<td>more than 1 kitchen</td>
</tr>
<tr>
<td></td>
<td>Cook A/C - Major - Store Room</td>
<td>7 per standalone minimum; plus .5 overtime; plus .2 on-call if more than</td>
</tr>
<tr>
<td></td>
<td></td>
<td>500 offenders</td>
</tr>
<tr>
<td></td>
<td>Cook A/C - Major - Kitchen</td>
<td>1 AM, 1 PM per kitchen</td>
</tr>
<tr>
<td></td>
<td>Cook A/C - Major - Serving</td>
<td>1 AM, 1 PM per serving line</td>
</tr>
<tr>
<td>Plant</td>
<td>Facilities Manager (WMS)</td>
<td>1 per major facility</td>
</tr>
<tr>
<td></td>
<td>Plant Manager 3</td>
<td>1 per facility; add 1 each increment of 1,000 offenders over 1,000</td>
</tr>
<tr>
<td></td>
<td>Auto Mechanic Supervisor</td>
<td>1 per facility over 500 offenders; add 1 for transport buses</td>
</tr>
<tr>
<td></td>
<td>Construction &amp; Maintenance Supervisor</td>
<td>1 per facility + 1 over 500; add 1 each full increment of 500 offenders</td>
</tr>
<tr>
<td></td>
<td></td>
<td>over 500; add 1 each major 25 years and over</td>
</tr>
<tr>
<td></td>
<td>Custodian 4</td>
<td>1 per facility. Custodian 5 at facilities with more than 2,000 offenders</td>
</tr>
<tr>
<td></td>
<td>Maintenance Mech 4</td>
<td>1 per facility + 1 over 500; add 1 each full increment of 500 offenders</td>
</tr>
<tr>
<td></td>
<td></td>
<td>over 500; add 1 each major 25 years and over</td>
</tr>
<tr>
<td></td>
<td>Locksmith, Locksmith Lead, Locksmith Supervisor</td>
<td>1 per major facility. Allocation based on criteria specified in job class</td>
</tr>
<tr>
<td></td>
<td></td>
<td>definitions</td>
</tr>
<tr>
<td></td>
<td>Plumber/Pipefitter/Steamfitter Supervisor</td>
<td>1 per facility over 500 cells; add 1 over 1,000 cells + 1 each major</td>
</tr>
<tr>
<td></td>
<td></td>
<td>50 years and over</td>
</tr>
<tr>
<td></td>
<td>Electrician Supervisor</td>
<td>1 per facility; add 1 over 1,000 cells + 1 each major 25 years and over</td>
</tr>
<tr>
<td></td>
<td>Stationary Engineer 3</td>
<td>1 per power plant</td>
</tr>
<tr>
<td></td>
<td>Stationary Engineer 2</td>
<td>4 per power plant with 24/7 operation + .4 on-call</td>
</tr>
<tr>
<td></td>
<td>Grounds/Nursery Specialist</td>
<td>1 per major facility. Allocation of G/N Spec 4 or 5 based on criteria</td>
</tr>
<tr>
<td></td>
<td></td>
<td>specified in job class definitions</td>
</tr>
<tr>
<td></td>
<td>Electronic Tech 4</td>
<td>1 per facility with electronic detection + 1 with electronic locking</td>
</tr>
<tr>
<td>Program</td>
<td>Job Class</td>
<td>Standard</td>
</tr>
<tr>
<td>-------------------------</td>
<td>----------------------------------</td>
<td>------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>System over 500 cells + 1 if required to maintain telephones + 1 each major 25 years and over</td>
</tr>
<tr>
<td>Wastewater Treatment Plant Operator 3</td>
<td>1 per treatment plant; add 1 per facility over 500 offenders</td>
<td></td>
</tr>
<tr>
<td>Environmental Specialist 5</td>
<td></td>
<td>Requires Asst. Secretary's Authorization</td>
</tr>
<tr>
<td>Support</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clerical/Paraprofessional (AA3)</td>
<td>1 per large major each 80 persons served; 1 per mid-sized major each 72 persons served; 1 per minimum each 62 persons served</td>
<td></td>
</tr>
<tr>
<td>Mailroom</td>
<td>Mail Processing Driver</td>
<td>1 per facility for each increment of 600 persons served</td>
</tr>
</tbody>
</table>
Staffing Not Included in NCSM

Operational areas not addressed by the NCSM include health care; information technology; human resource functions such as recruitment and personnel management; and administrative responsibilities including payroll, purchasing, warehousing, and financial reporting. The following analysis examines the potential utility of a standardized model-based approach to staffing in these functional areas.

Health Care. The Health Services Division manages the delivery of medical and mental health care in all DOC facilities. Unlike many state correctional systems that contract out for health care services, the DOC primarily delivers facility health care services with state employees. The Division has an authorized staffing level of 937 state health care positions, of which approximately 37 percent are nurses. The following table summarizes Health Services staff positions by facility. A profile of facility health care staffing, programs, and service needs follows.

Airway Heights Corrections Center

- Multi-custody (medium/minimum)
- 66.7 medical FTEs
- 23-bed infirmary
- 3 close observation cells
- Special needs/services - Sex Offender Treatment Program; Physical Therapy; Therapeutic Community, Intensive Outpatient, and Intensive Day Treatment for substance abuse treatment; high acuity cases including cancer and cardiac care; large geriatric population; and high volume intake of parole violators

Cedar Creek

- Minimum
- 4.0 FTEs
- Special needs/services - Intensive Day Treatment

Clallam Bay Corrections Center

- Multi-custody (close/medium)
- 31.3 FTEs
• Medical Director on call and covers Olympic CC
• Psychiatric services provided from WCC

Coyote Ridge
• Multi-custody (medium/minimum)
• 77.1 FTEs
• 2 bed Close Observation unit for mental health
• 100 bed segregation unit
• 4 bed Extended Outpatient Unit for post hospitalization/procedure inmates or that require monitoring
• Special needs/services – SAGE; Intensive Day treatment
• No treatment room in health care unit, assessments done in hallway by nurses’ station

Larch Corrections Center
• Minimum
• 6.0 FTEs
• Special needs/services - Therapeutic Community
• Only stand-alone camp with dental services
• WCC provides clinical oversight

Mission Creek Corrections Center for Women
• Minimum
• 8.0 FTEs
• 2 close observation cells
• Special needs/services - Intensive Day Treatment
• 60% of their 305 offenders on psychotropic medications
• Dental services are also provided at WCCW
Monroe Correctional Complex

- Multi-custody (medium/minimum)
- 177.3 FTEs
- 25-bed infirmary
- 21 close observation cells
- Special needs/services – Dialysis; Intensive Day Treatment; SOTAP; Intensive Outpatient; geriatric population; Mental Health Residential Treatment Unit
- Special Offender Unit has massive pill lines due to patient acuity
- Large, spread-out campus

Olympic CC

- Minimum
- 4.0 FTEs
- Therapeutic Community
- Radiology and dental appointments scheduled at Clallam Bay

Stafford Creek CC

- Multi-custody (medium/minimum)
- 66.8 FTEs
- 24-bed infirmary
- Large geriatric population
- 5 close observation cells
- Special needs/services – Physical Therapy; Intensive Day Treatment; Intensive Outpatient
- Large violator intake often in need of detoxification services.
Washington Correctional Center

- Multi-custody (close/medium)
- 80.3 FTEs
- 12-bed infirmary
- 5 close observation cells
- Special needs/services – Intensive Day Treatment
- Male intake center/medical hub for system

Washington Corrections Center for Women

- Multi-custody (close/medium)
- 70.5 FTEs
- 14 infirmary beds
- 10 close observation cells
- Special needs/services – Intensive Day Treatment; Intensive Outpatient; Therapeutic Community; OB/GYN; SOTAP
- Female intake
- 60% of population on psychotropic medications

Washington State Penitentiary

- Multi-custody (max/close/medium/minimum)
- 135.0 FTEs
- 46 infirmary beds
- 18 close observation cells
- 108 RTU beds
- Special needs/services – Residential Treatment Unit; Physical Therapy; Intensive Day Treatment; Intensive Outpatient
- 12 locations where services are provided (pill lines, sick call, etc.) with large distances
to cover. East Complex is the only men’s minimum facility with three (long) pill lines each day.

As can be seen from this summary, the health care programs at each facility have significant variations in the type of programs offered, services provided, and population characteristics. Evolving changes in healthcare service delivery needs have complicated program staffing in recent years. These include increased complexity in patient acuity, a growing number of geriatric offenders with multiple health issues, high rates of mental illness and substance abuse history, enhanced need for chronic care management, and the number of community supervision violators admitted to the correctional system with emergent health care issues. Policy initiatives including expanded Hepatitis C treatment and development of a medication-assisted treatment program for opioid use disorder have increased Division workload as well. The large number of community supervision violators admitted to the correctional system with emergent health care issues to include mental health and detoxing further exacerbate existing workloads. Finally, the WDOC’s program for management of transgender inmates creates substantial additional duties for medical staff in those facilities with significant transgender population levels.

The Department faces the following issues in developing a health care staffing plan that provides an effective response to these service demands:

**No Electronic Health Record.** The DOC lags significantly behind most state and large county correctional systems in its lack of a modern electronic health record (EHR) system. The Department relies upon a paper medical record, a stand-alone computerized practitioner order entry system (CIPS), and separate consultation and encounter entry system (OMNI). These systems are not integrated with each other and do not provide the clinical data necessary for effective management of service delivery performance. Moreover, the lack of automation means that retrieving required data can be a time-consuming, manual process which make inefficient use of available health care staff resources. Development of a staffing plan that optimizes use of available resources requires detailed data on patient needs, treatment plans, and outcomes. The lack of an effective EHR makes the collection and analysis of this data problematic.

**Finding:** The DOC requires an electronic health record system to improve staff efficiency and provide the data required for effective management of the system.

**Lack of Nursing Relief Staff.** Facility staffing allocations for nurses generally do not accommodate adequate relief staffing. While some facilities, such as Washington State Penitentiary do maintain a limited nursing relief pool, the most facilities do not consider staff relief time in assigning nurse staff.
Nurses, like correctional officers, work 24/7 shift assignments throughout the year to assure consistent access to care. Because these staff have regularly scheduled days off, vacations, utilize sick time, have training requirements etc., a determination of staffing requirements requires calculation of an accurate relief factor, identification of job assignments that require relief, and application of the relief factor to these assignments to derive the total staffing complement needed to assure continuing staff coverage. High levels of overtime ($1,842,534 in FY 2018) and reliance upon contract nurses for staff coverage provide ample evidence of the need for relief staff.

**Finding:** High levels of overtime and use of contract staff indicate a shortfall of nursing staff to provide required staff coverage.

In developing a relief factor for nurses, we used the same methodology employed in the development of relief factors for custody staff. Nurses on an 8-hour shift schedule are available for work 2,088 hours per year. However, this maximum availability does not reflect actual time available for assignment. The Net Annual Work Hours (NAWH) accounts for the time staff are not available due to leave, sickness, or other type of absence. The relief factor is the ratio of the required hours for a job assignment to the actual hours that staff are available on average.

2018 leave data for RN 2, Nursing Assistant, LPN 2, and LPN 4 positions indicates that staff in these job categories on average were not available to work for 416 hours of their assigned annual work schedule. This includes 150 hours of authorized leave, 92 hours of sick leave, and 134 hours of other categories of leave (FMLA, Comp, LWOP, etc.). Additionally, we assume an average of 40 hours of annual training that takes staff from away from job duties. As a result, the Net Annual Work Hours (NAWH) for job assignment is 1,672 (2,088 total assigned hours – 416 hours away from post), and the 2018 relief factor for an 8-hour/7-day per week job assignment is 1.85.

**Table 22: Nursing Relief Factor**

<table>
<thead>
<tr>
<th>Total Days/Hours in Work Year</th>
<th>2,920 hours in year</th>
<th>Hours Remaining</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Regular days off</td>
<td>832</td>
<td>2,088</td>
</tr>
<tr>
<td>- Average Leave</td>
<td>376</td>
<td>1,712</td>
</tr>
<tr>
<td>- Average Time Away for Training</td>
<td>40</td>
<td>1,672</td>
</tr>
<tr>
<td>Total Time Away from Post Assignment</td>
<td>1,248 Hours</td>
<td></td>
</tr>
<tr>
<td>Time Available to Fill Post (NAWH)</td>
<td>1,672 Hours</td>
<td></td>
</tr>
<tr>
<td>Holiday relief factor requirement</td>
<td>0.1</td>
<td></td>
</tr>
<tr>
<td>8-hour/5-day per week assignment</td>
<td>1.35</td>
<td></td>
</tr>
<tr>
<td>8-hour/7-day per week assignment</td>
<td>1.85</td>
<td></td>
</tr>
</tbody>
</table>
The impact of this relief factor upon actual facility staffing requires identification of those job assignments that require relief to assure continuous coverage of nursing services. Upon identifying these assignments, the relief factor can be applied to generate actual facility staffing requirements. The average number of full-time nurses in the RN 2, Nursing Assistant, LPN 4, and LPN 2 job categories in the facilities in calendar year 2018 was 277. Not all these positions require relief. However, for illustrative purposes, assuming half of these positions require relief, use of this relief factor would indicate a need for 104 additional nurses to be hired.

**Recommendation:** Apply a relief factor to nursing positions in patient care positions that require continuous staff coverage.

**Inadequate Nurse Supervisory Coverage.** Management supervision of nurse staffing is minimal, particularly on night shifts and weekends. RN 3s have responsibility for shift management, but are often required to provide relief coverage, making it impossible to provide adequate management oversight. This leaves floor nurses with minimal if any direction over their activities.

**Finding:** Use of supervisors to provide relief for line staff impairs facility health care unit management.

Best practices would call for an RN 4 to lead the nursing program at each major facility, supported by an RN 3 on each shift to provide operational direction. Charge nurses also require better information management support, particularly in the areas of roster management. Currently, the Department uses labor-intensive spreadsheets to support current staff scheduling.

**Finding:** Implementation of an automated nurse scheduling tool or software system would free up nursing supervisor time spent on staff scheduling for more critical clinical supervision responsibilities.

**Insufficient Medical Practitioner Support.** Adequate clinical care requires assignment of medical assistants or nursing staff to medical practitioners (physicians, psychiatrists, advanced care practitioners, and medical assistants). This ensures that medical practitioners make the best use of their available time and work at those specific tasks appropriate to their level of licensure. The current ratio of medical assistants to care providers in the system is 1:5. Clinical support staff are also needed for preventive health services, chronic disease tracking, chronic care management, coordination of post hospital discharge care coordination, and support of MAT for opioid use disorder patients. These responsibilities are either temporarily assumed by staff with other primary assignments or are not performed at all.
Finding: Lack of adequate medical practitioner support impairs clinical effectiveness and productivity.

Physician Staffing Shortage. Eleven of the fifteen (73 percent) physician positions in the system are either vacant or have an incumbent near retirement. Recruitment and retention of physicians is a major issue for the correctional health care system.

Inadequate Physical Plant. Health care units in several facilities lack the space for staff required to meet examination needs. In several institutions, examinations are held in hallways, making patient confidentiality impossible.

Program and Policy Changes. Additional work duties associated with new or programs, policies, and administrative directives have been implemented without appreciable changes in staffing to support these changes. These include expanded Hepatitis C treatment; MAT implementation; Chronic Care Management; revised protocols for Optometry, Dentures, Dry Cell Watch, Suicide Prevention; QA; and SUD Patient Education.

Development of a standardized staffing model that addresses these issues and reflects the complexity of the health care system as well as the unique characteristics of each institution is very difficult. The dual goals of providing a simple, standardized methodology for determining staff requirements while still addressing specific facility issues are in extreme tension with each other. The National Commission on Correctional Health Care (NCCHC), the leading authority on correctional health care delivery, concurs with this perspective:

No request is received more often at NCCHC than that for model health staffing patterns. NCCHC has weighed the temptation to create them against the very real dangers of doing so. Whatever staffing models might be developed would be applicable only to facilities that shared all of the assumptions on which such staffing was based…. The very complexity of the task and the numerous factors that affect the result argue for creating health staffing patterns on a case-by-case basis.⁴

Finding: A standardized model for facility health care staffing is not consistent with the complexity of DOC facility needs, or best practices in correctional health care.

Instead of a model, NCCHC recommends a detailed review of individual facility health care service characteristics that considers the following factors:

- Facility ADP

- Intake Volume and Average Length of Stay
- Patient Population Profile
  - Security Classification
  - Security Policy
    - Service delivery
    - Segregation rounds
  - Demographics
    - Age distribution
    - Special needs
      - Dialysis
      - Chronic care
      - Mobility impairment
      - Communicable diseases
      - Gender
  - Services provided
    - Infirmary
    - Assisted living
    - Mental health
    - Intake assessment
    - Physical therapy
    - Hospice
    - Dementia
    - Dental-basic and specialty care
    - Chronic disease clinics
Within the context of explicit consideration of these factors, an analysis of staffing can be developed around very basic workload metrics. The best, most trusted method of estimating staffing needs is based on the standard of 10 patients seen in a half day by physicians. This would mean a physician could have scheduled 20 visits in an eight hour outpatient day. The analogous standard for advanced level practitioners, both nurse practitioners and physician assistants, is somewhere between seven and 10 patients per half day; in other words, 14-20 patients in an eight hour outpatient day. This type of schedule is only achievable with the data support and information made available with an electronic health records system.

Usually, more new patients that need to be seen, especially for chronic disease services, will cut down on the productivity quantification. Whereas a follow-up patient can be seen in 20 minutes, a new patient followed for chronic illnesses probably takes 30 to 40 minutes per visit. The mixture of sick call referrals and chronic care follow ups can result in 20 minutes for sick call and 20 minutes for a chronic care follow up in which the patient is in good control. The demand for sick call services is based on symptomatic requests. The so-called administrative requests for information or refills of medication can be addressed by nurses.

An average sick call nurse can see 10-15 patients in a half day, and this can be quantified to between 20 and 30 patients in an entire day. Some patients have more complex diseases, such as end stage renal disease or multiple sclerosis, and those patients may take some extra time, but an initial visit for a chronic disease is estimated to require 40 minutes and a follow-up visit 20 minutes. A nursing assessment for a routine sick call complaint may be seen in less than 15 minutes.

The analysis needs to review the pass thru rate from nurse sick call and estimate the quantity of referrals from the nurse to the clinician based on the average number of requests for sick call for symptom presentation per day or per week. Patients who are seen for chronic care services,
if they are in good control as opposed to fair or poor control, may be seen more quickly. Patients in fair or poor control require a detailed plan and possibly monitoring in the interim period to determine whether the plan achieves the expected outcome.

Emergency services can be quantified as to frequency per day on average, and those emergency services require at least 20 minutes by the clinician and the nurse. The staffing should be calculated based on expected leave time and a relief factor. We have been made aware of the fact that in some employees, family medical leave time may appear to be excessive. The calculations for each service and each credentialed professional need to be calculated for appropriate quantities of resources.

Sustainable clinician productivity at these levels will not be possible without substantial changes to the Department’s information system infrastructure and outpatient clinic staffing.

**Recommendation:** Analysis of facility health care staffing needs requires reliable data on patient needs and care provider interactions, as documented in a modern electronic medical record. The first step toward improving health care services and conducting an accurate assessment of staffing needs is to implement a modern electronic health record system.

**Administrative Functions.** Other areas not addressed by the NCSM including information technology, personnel management, and accounting are all largely centralized, with staffing planned and directed by the DOC central office bureaus responsible for these functional areas. In many cases, staffing in these areas is not facility-based, but is instead functionally shared across facilities. This allows management to deploy staff resources as needed among facilities to address specific issues or needs as they develop. Many large state correctional systems such as Florida, Texas, Illinois, and Michigan have developed similar systems of shared administrative services to facilitate the most effective use of available resources to address evolving facility needs. The approach enhances central office discretion in the management of these functions. As such, staffing these functions is not an appropriate subject for a standardized staffing model. No state correctional system to our knowledge has attempted to develop a staffing model to guide staffing of these functions.