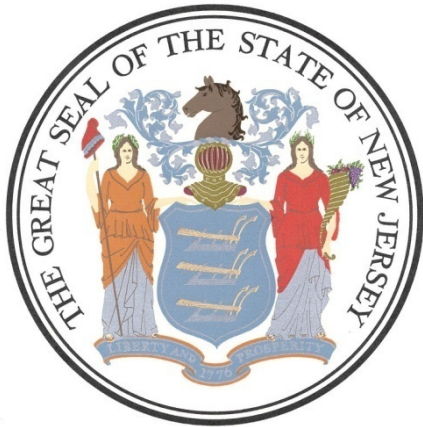


State of New Jersey

Office of the State Comptroller

Marc Larkins, Acting State Comptroller



An Analysis of
**OVERTIME IN ADULT COUNTY
CORRECTIONAL FACILITIES ACROSS
NEW JERSEY**

February 5, 2015

TABLE OF CONTENTS

I. Introduction	1
II. Background and Methodology.....	1
III. Statewide Findings	2
IV. Background of Counties Reviewed.....	5
V. Overview of Causes of Overtime	6
VI. Conclusions and Recommendations.....	13

I. Introduction

The Office of the State Comptroller (OSC) initiated this review after observing numerous media reports detailing high overtime costs in adult county correctional facilities across New Jersey. From fiscal year (FY) 2010 through 2012, counties spent approximately \$185.7 million statewide on overtime compensation. Our objective was to identify the root causes of excessive overtime costs and to recommend ways to reduce these costs. Our review of several adult county correctional facilities found that some facilities regularly incurred high overtime costs, while others consistently kept overtime costs to a minimum. While the causes of overtime costs differed somewhat from county to county, our review found that proper staffing and appropriate administrative and financial oversight can serve to reduce overtime costs.

II. Background and Methodology

During our review period of FY 2010 through 2012 there were 21 adult county correctional facilities in New Jersey.¹ Direct responsibility for oversight of the facilities varied across the counties. Nine of 21 facilities were under the jurisdiction of the county departments of corrections, nine were under the jurisdiction of the county sheriffs' offices and three were under the jurisdiction of the county departments of

public safety. At the state level, the Office of County Services in the New Jersey Department of Corrections (DOC) conducts physical inspections and programmatic evaluations of county correctional facilities. It should be noted that after our review period, Gloucester County closed its correctional facility.

All sworn county corrections officers and superior officers are represented by a union. The terms and conditions of corrections officers' employment are generally dictated by collective bargaining agreements (CBAs) negotiated by the union and respective counties. The terms of each CBA differ.

In addition, with the exception of officers in Somerset County, all county corrections officers in New Jersey are considered civil service employees. The Civil Service Commission regulates the employment practices of New Jersey civil service employers, specifically hirings, firings, layoffs, paid and unpaid leaves, equal employment opportunities, compensation, job duties and job performance evaluations.

We obtained employment-related documentation, including the applicable CBAs, overtime and attendance policies and any arbitration decisions for all 21 county correctional facilities. We also analyzed data from the counties to identify spending trends and facilities with disproportionately high overtime costs. Using this information, we ranked the 21 counties by the percentage of total compensation spent on overtime for corrections officers and superior officers and the percentage of total correctional facility

¹ Burlington County operates the Burlington County Detention Center and the Correction Work Release Center. For the purposes of this report these two centers will be considered one facility.

expenditures spent on corrections officer overtime.²

We then selected a geographically diverse sample of counties for further review. This included counties that paid a higher than average percentage of their overall compensation for corrections and superior officers in overtime (Salem, Mercer and Union) and counties that paid a smaller than average percentage of their compensation for corrections and superior officers in overtime (Bergen, Warren and Cape May). We interviewed correctional facility officials from all six selected counties, as well as county officials in Mercer, Salem and Union counties.

We provided a draft copy of the relevant sections of this report to the counties and correctional facilities specifically reviewed, as well as to those counties and correctional facilities that fell within the top five of the overall rankings of overtime spending, to give them an opportunity to review and comment. In preparing this final report we considered the responses we received and incorporated them herein where appropriate.

III. Statewide Findings

Statewide, from 2010 to 2012, New Jersey's adult county corrections officers were paid approximately \$185.7 million for working 3.9 million hours of overtime.

Based on the data we reviewed, we determined that New Jersey's adult county correctional facilities spent more than 14 percent of their aggregate payroll and nearly 10 percent of their aggregate expenditures on overtime for corrections officers.

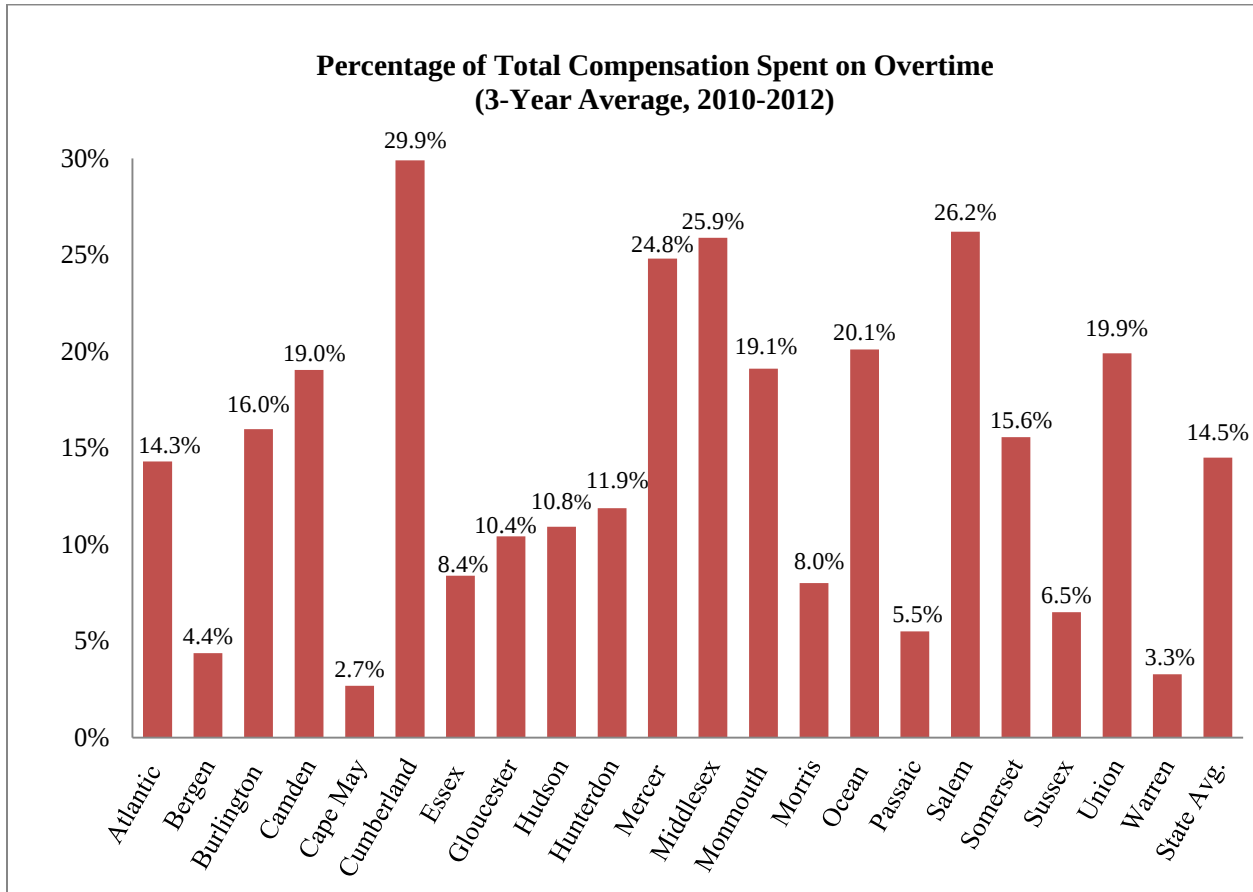
However, we found spending on overtime for corrections officers varied greatly among the different county correctional facilities. We identified facilities that appeared to control overtime costs and facilities whose costs were roughly double the statewide average. For example, overtime costs represented less than 4 percent of the total expenditures at some facilities, while it represented more than 25 percent of the total at others.

Chart 1 shows the percentage of total compensation spent on corrections officer overtime for the three-year period for each of the 21 facilities, along with the statewide average.³

² The data provided by Hunterdon County appears to contain errors. Despite multiple requests by OSC, Hunterdon did not provide accurate data. As a result, OSC made certain assumptions regarding Hunterdon's data and determined that the errors likely would not have altered their ranking significantly enough to place them in the top or bottom five of the overall rankings of overtime spending (as depicted in Chart 3).

³ The 2010 and 2011 data for Passaic County includes both corrections officers and the sheriff's department jail patrol.

Chart 1

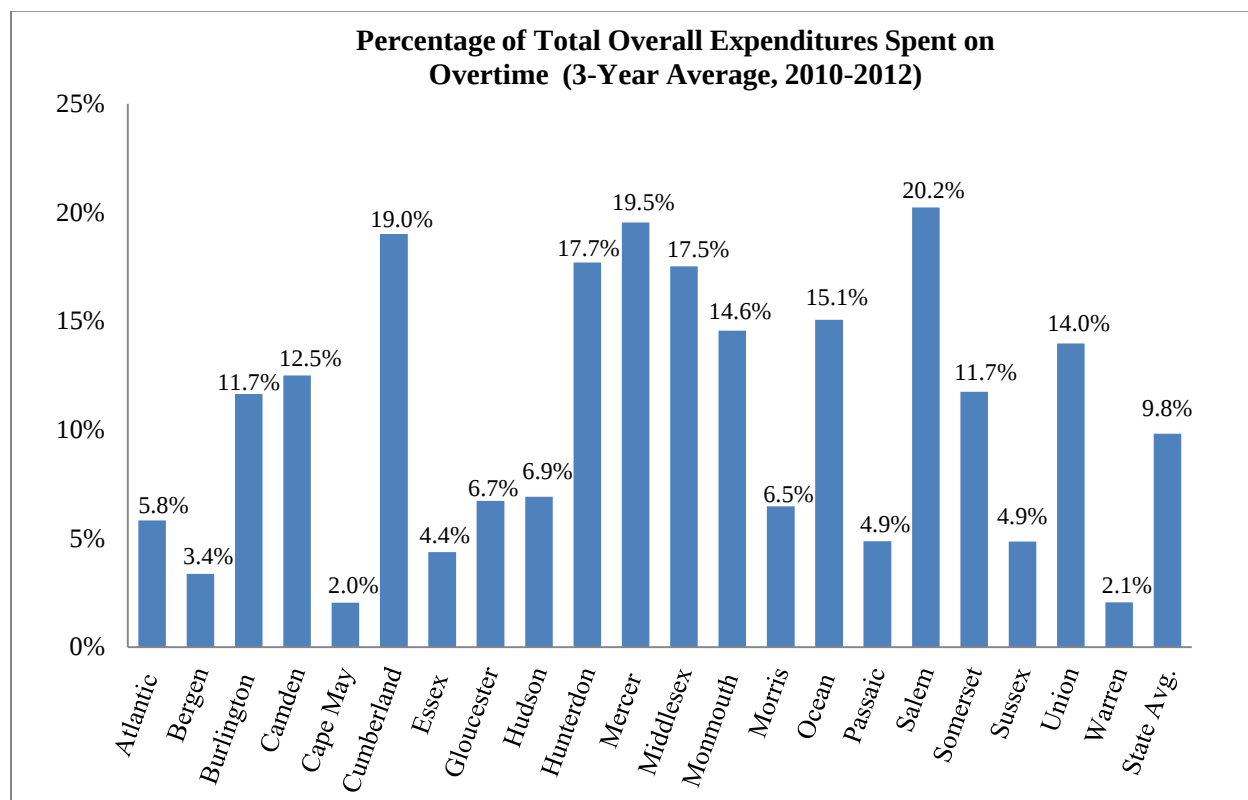


As shown, the facilities in Cumberland, Salem and Middlesex counties had the highest percentage of overtime costs relative to overall officers' compensation. Facilities in Cape May, Warren and Bergen counties

had the lowest percentages. Five facilities - those in Cumberland, Mercer, Middlesex, Ocean and Salem counties - spent at least 20 percent of their total corrections officer compensation expenditures on overtime.

Chart 2 shows the percentage of total expenditures spent on corrections officer overtime at each of the 21 correctional facilities, along with the statewide average over the same three-year period.

Chart 2



As shown, Cumberland, Mercer and Salem counties spent the highest percentage of their correctional facility expenditures on corrections officer overtime, while Bergen, Cape May, and Warren counties spent the least.

When considering both factors, overtime spending as a percentage of compensation and overtime spending as a percentage of total spending, the ranking changed slightly. Chart 3 shows the overall county rankings in descending order for the three years reviewed. We selected the counties in bold for further review.

Chart 3

Overall Ranking of Overtime Spending (3-Year Average, 2010-2012)	
1. Salem	12. Hudson
2. Cumberland	13. Atlantic
3. Mercer	14. Gloucester
4. Middlesex	15. Morris
5. Ocean	16. Essex*
6. Monmouth*	16. Sussex*
6. Union*	18. Passaic
8. Hunterdon	19. Bergen
9. Camden	20. Warren
10. Burlington	21. Cape May
11. Somerset	

* denotes a tie

IV. Background of Counties Reviewed

We found that adult county correctional facilities in New Jersey vary significantly in terms of physical configuration, inmate population, staffing, command structure, management practices, union influence and overall atmosphere.

Salem County Correctional Facility

Salem County Correctional Facility (SCCF) is located in the Borough of Woodstown, Salem County. The facility houses approximately 400 inmates and is overseen by the Salem County Sheriff's Office, Corrections Division.

From 2010 to 2012, SCCF spent approximately \$28.7 million in gross compensation for its corrections officers, including more than \$7.5 million for overtime. During that period, corrections officers averaged approximately \$66,000 annually in gross compensation, of which more than \$17,000 was for overtime.

Mercer County Correction Center

Mercer County Correction Center (MCCC) is located in the Township of Hopewell, Mercer County. The facility is a short-term jail that confines both men and women and has the capacity to house 880 inmates with minimum, medium and maximum security classifications. MCCC is under the jurisdiction of the Mercer County Department of Public Safety.

From 2010 to 2012, MCCC spent approximately \$89.7 million in gross compensation for its corrections officers, including more than \$22.2 million for overtime. During that period, corrections officers averaged more than \$107,000 annually in gross compensation, of which more than \$26,000 was for overtime.

Union County Jail

Union County Jail (UCJ) is located in the City of Elizabeth, Union County. The facility houses approximately 1,100 male and female inmates and is overseen by the Union County Department of Correctional Services.

From 2010 to 2012, UCJ spent approximately \$87.2 million in gross compensation for its corrections officers, including more than \$17.3 million for

overtime. During that period, corrections officers averaged nearly \$90,000 annually in gross compensation, of which more than \$18,000 was for overtime.

Bergen County Jail

Bergen County Jail (BCJ) is located in the City of Hackensack, Bergen County. The facility has the capacity to house approximately 1,150 inmates and is overseen by the Bergen County Sheriff's Office.

From 2010 to 2012, BCJ spent approximately \$88.3 million in gross compensation for its corrections officers, including more than \$3.9 million for overtime. During that period, corrections officers averaged approximately \$102,000 annually in gross compensation, of which more than \$5,000 was for overtime.

Warren County Correctional Center

Warren County Correctional Center (WCCC) is located in the Town of Belvidere, Warren County. The facility has the capacity to house approximately 176 inmates and is overseen by the Warren County Sheriff's Office.

From 2010 to 2012, WCCC spent approximately \$13.7 million in gross compensation for its corrections officers, including nearly \$448,000 for overtime. During that period, corrections officers averaged more than \$61,000 annually in gross compensation, of which approximately \$2,000 was for overtime.

Cape May County Correctional Center

Cape May County Correctional Center (CMCCC) is located in Cape May Court House, in Middle Township in Cape May County. The facility has the capacity to house approximately 181 inmates and is overseen by the Cape May County Sheriff's Office.

From 2010 to 2012, CMCCC spent approximately \$16.1 million in gross compensation for its corrections officers, including more than \$430,000 for overtime. During that period, corrections officers averaged more than \$58,000 annually in gross compensation, of which more than \$1,000 was for overtime.

V. Overview of Causes of Overtime

The intent of this review was to identify factors that contributed to disproportionately high overtime costs at some facilities and to identify best practices that could be implemented at these facilities, as well as statewide, to control overtime costs. The findings that follow reflect some of the factors contributing to overtime costs.

Management Practices and Administrative Oversight

Our review found that management practices and oversight of overtime spending were inconsistent across the counties we evaluated. Some facilities appeared to be highly focused on both administrative and custodial issues, while other facilities appeared to focus primarily on custodial issues. Strong administrative oversight by

the county, the sheriff or jail management contributed to the more efficient and cost effective use of overtime. Conversely, poor oversight by management concerning overtime expenditures allowed for excessive overtime spending.

Oversight of Overtime Expenditures

Based on interviews we conducted with officials at Mercer County and at MCCC, it appears that neither MCCC nor county officials sufficiently monitor overtime expenditures at the facility. For example, at MCCC the Warden told us that he and his staff are responsible for authorizing overtime, but do not perform any fiscal monitoring of overtime spending. According to the Warden and Captain, overtime shifts required a memo stating why the shift was necessary and had to be signed by the shift commander. If no memo was issued, the overtime shift was not authorized. However, when we requested the memos for a specific week, MCCC was only able to produce one, stating that the memos are generally not kept on file. Such lax practices regarding document retention and record keeping render it impossible to review the use of overtime resources and their justification.

The MCCC Warden also said he was not aware of the budgeted amount for overtime for 2012 and 2013. He further indicated that monitoring overtime and other fiscal matters was the responsibility of the county's Chief Financial Officer (CFO). The county CFO, however, explained that he has little interaction with MCCC. As he described it, his office reviews some payroll checks for the facility and occasionally answers

questions about whether there is money available for a particular purchase. He stated that the Warden has access to all budget data through the county's intranet system and that it is the Warden's responsibility to monitor the budget and overtime expenses. The CFO said his office neither reviews whether overtime is authorized nor regularly monitors overtime expenditures. This lack of oversight may have contributed to Mercer County spending nearly 19 percent of total MCCC facility expenditures on overtime costs during our period of review.

In contrast, overtime expenses in other counties are reviewed by county government staff and either the sheriff's office or the correctional facility. For example, the Bergen County Warden told us the county budget officer provides an overtime report to the Sheriff, Under Sheriff and Warden every two weeks. Similarly, in Cape May County, the Warden said he provides the Sheriff's office with a monthly report detailing the overtime hours used by each squad, how it compares to the overtime used the previous month and an explanation for any increases or decreases in overtime usage.

We recommend that facilities make an affirmative effort to review and monitor overtime costs. At a minimum, facilities should keep logs or records of their overtime usage and the rationale for its use, and responsibilities for keeping track of overtime expenditures should be clearly delineated. This would afford each facility an opportunity to review and identify the factors underlying overtime costs.

Staffing Issues

Management and administrative oversight also played an important role with respect to staffing. Facilities that are understaffed or that have not adequately planned for their staff's use of leave time are generally forced to fill vacant posts with overtime. The more vacant posts there are, the more overtime is needed to fill them.

N.J.A.C. 10A:31-8.15(a) states that every "adult county correctional facility shall have a written staffing plan for all shifts." The regulation does not detail what should be included in the staffing plan or what factors should be considered in its development.

Facilities should consider adopting a staffing plan that is clearly defined, similar to the one outlined in the National Institute of Corrections' *Staffing Analysis Workbook for Jails (Second Edition)*. The National Institute of Corrections (NIC) points out that a staff coverage plan is not the same as a shift roster, which merely assigns individual employees to specific shifts. NIC recommends that in developing a staffing analysis for an existing facility, the facility should list all of the posts and positions that are currently filled and evaluate them in terms of the level of supervision, staff and inmate safety, coverage of activities, span of control, and demands for overtime. The objective in creating a staffing analysis is "to determine both the minimum coverage needed for staff and inmate safety, based on the fixed posts that are identified, and the proper coverage for intermittent activities that occur in the jail."

In this regard, we found that the lack of a regularly updated staffing analysis can lead to an increase in overtime spending. Salem County and Mercer County facilities serve as examples of the consequences of failing to perform an updated staffing analysis.

According to the inspection conducted by DOC's Office of County Services in 2012, Salem County Correctional Facility had a written staffing plan and therefore met the minimum requirements regarding staffing at the facility. During our interview, the SCCF Warden reported a staffing analysis of the facility had not been performed since 2002. Although the facility does have, nominally, a staffing plan, the plan is based on data that is more than a decade old and therefore out of date.

An updated staffing analysis would result in a staffing plan for SCCF that addresses any significant changes in the past decade and better anticipates and handles staffing shortfalls. For example, an updated staffing analysis would account for any changes in SCCF's inmate population since 2002. The Warden stated that in the past year alone, the inmate population at the facility had increased by approximately 175 people (125 males and 50 females) due to the closing of the Gloucester County Jail. An updated analysis would also consider the effects of leave time and sick leave usage. The Warden and administration at SCCF said that sick leave abuse is a major problem at the facility and that they have made efforts to monitor sick leave usage and identify patterns in its use. This information should be used in the updated staffing analysis to

better account for the total actual number of hours that need to be worked.

As a possible solution, the Warden informed us that SCCF is reviewing the feasibility of a work schedule that includes a “power shift.” The power shift is intended to provide overlapping personnel to cover vacant post positions between 7:00 a.m. and 11:00 a.m. Consideration of the use of the “power shift” should be part of a comprehensive staffing analysis for the facility.

In Mercer County, MCCC provides another example of the need for a regularly updated staffing analysis. Neither MCCC nor the county administration performs a formal written staffing analysis to determine the facility’s staffing needs each year. Instead, the Warden only reviews the list of vacancies for that year to determine whether additional staff is necessary to fill the vacated slots. While the facility may meet the technical requirements of *N.J.A.C. 10A:31-8.15(a)*, a more formal staffing analysis may allow the facility to develop a staffing plan that anticipates problems and addresses the specific needs of the facility.

For example, as with SCCF, the MCCC Warden indicated that sick leave abuse and long-term absences have been a problem at the facility and a significant cause of overtime expenses. When an officer calls out sick, typically that officer’s post is filled with an officer working overtime. The MCCC Warden reported that in 2012 there were 700 time and attendance violations for incidents such as failing to report to work or taking unauthorized leave.

The Warden also indicated that much of the overtime at the facility is due to special assignments, including unanticipated medical transports, construction details or one-on-one supervisions. According to an MCCC official, special assignment hours are nearly all paid at the overtime rate. We estimate the average overtime rate for MCCC in 2012 was approximately \$53 per hour. In 2012 alone, MCCC spent nearly \$2.7 million on these special assignments, representing nearly 32 percent of its overtime expenses that year.

It does not appear that these leave-related issues have been factored into any staffing analysis or staffing plan in recent years. A formal staffing analysis, similar to the one recommended by the NIC, could help the facility determine the actual number of staff hours available to be scheduled, leading to more accurate scheduling and potentially reducing overtime use. All facilities should have an up-to-date written staffing plan and those plans should be based on a comprehensive staffing analysis.

Leave and Staffing Policies

As detailed in the prior section of this report focusing on staffing issues, leave and staffing policies impact the number of shift vacancies that facility administrators are required to fill. Generally speaking, the higher the rate of vacancy, the higher the resulting cost of overtime.

Collective bargaining agreements dictate the terms of the employment relationship, and can increase overtime by conferring generous benefits on employees or restricting management’s ability to

discipline and supervise employees. We noted that in many instances, collective bargaining agreements memorialize the amount and use of leave time afforded to corrections officers. In certain instances, the collective bargaining agreements appeared to be extremely favorable to the employees, leaving the administration with the responsibility of managing the consequences of these liberal leave policies. This in turn affected overtime spending.

For example, in Union County, according to UCJ's CBA, from Memorial Day to Labor Day, as many as 20 officers can be out on any given day for vacation leave, personal leave or compensatory time.⁴ This does not include any officers who have called out sick or who are out on other types of medical leave. The UCJ Director indicated that because the CBA provides that up to 20 officers can be out on these days, the administration has little discretion to deny a leave request for personal, compensatory or vacation time, if fewer than 20 contractually authorized vacancies have been taken for that day.

The Director of UCJ said that all vacant posts, including the 20 authorized vacancies allowed by the CBA, plus any vacant posts due to sick or other leave, are filled with officers working overtime. He stated that during the summer, generally all 20 authorized posts are vacant. As a result, on these days at least 20 vacancies per day must be backfilled, all at the overtime rate. We calculated that in 2012 UCJ's average rate

for overtime was almost \$61 per hour. Therefore, if in a single day 20 vacancies were filled with overtime, it would cost the facility, on average, nearly \$10,000 per day. This represents at least \$3,000 more per day than if they were paid at the regular rate.

Not only does this system result in extra costs for the facility but it also creates problems for management, as it can be difficult to find officers to fill so many vacant posts per day. We note that in Warren County, facility management had more discretion to deny certain types of leave if minimum staffing was not met. For example, in Warren County officers are not permitted to take certain types of leave unless their use would not cause overtime. The Warren County CBA also gives management the right to transfer employees from one shift to another to cover for officers on vacation leave.

We also found that some CBA provisions can expressly create excessive overtime expenses. Salem County provides an example of how renegotiating a CBA to remove overly favorable provisions to employees can result in a significant reduction in overtime spending.

Pursuant to the 2009 CBA at SCCF, all regularly scheduled shifts worked on Sundays were paid at time and a half. Overtime shifts worked on Sundays were paid at double the regular rate. Documentation provided by Salem officials showed that by paying time and a half rather than the regular rate for shifts on Sundays, the county paid approximately \$483,000 more than it would have if Sunday shifts were compensated at the regular rate. As a

⁴ The CBA provides that other times of the year the maximum number is seventeen.

result, Salem's total spending on overtime in 2012 was approximately \$2.7 million. This Sunday premium pay was eliminated in the most recent CBA, which became effective January 1, 2013. Had the Sunday pay been eliminated for 2012, overtime spending would have been reduced by nearly 18 percent.

Automated Overtime Calling Systems and Scheduling Software

In addition to the added overtime costs associated with officers filling vacancies, facilities also experience increased administrative costs associated with the scheduling function itself. For example, from 2010 to 2012, Union County Jail spent an average of almost \$124,000 per year scheduling overtime shifts at the facility. According to UCJ's CBA, there is a designated "overtime caller" post that is filled by a civilian employee. This is a 24-hour, 7-days-a-week post, meaning that each of three 8-hour shifts must be filled. At the time of our interview, UCJ had two civilian employees who filled the role of overtime caller for two of the shifts. The other shift was filled by a corrections officer or a civilian employee, both earning overtime. The UCJ Director indicated that while this function may take an entire 8-hour shift to complete, it sometimes does not. If a corrections officer is working the shift and finishes the calls early, the officer may be assigned to other jobs in the facility. However, if one of the civilian employees finishes early, the employee is not assigned any other work for the rest of the shift, but is still paid for eight hours. In other facilities, the scheduling role can be filled by an on-

duty corrections officer as part of their job responsibilities.

We found that some counties use automated overtime calling systems to call officers for overtime. Depending on the system's capabilities and the number of users, these automated overtime calling systems have startup costs of approximately \$20,000 to \$25,000, plus annual fees of \$20 to \$30 per user. We estimate that UCJ could save at least \$89,000 in the first year and \$114,000 annually in subsequent years if an overtime calling system was used.

In addition to the use of automated overtime calling systems, we also found that some counties used scheduling software to manage corrections officers' schedules and leave requests.

Warren County uses such scheduling software and reported that it helps the facility to control overtime hours. Other counties that have used such scheduling software have also reported lower expenditures for overtime.

We learned that sometime prior to our review period, Mercer County had purchased scheduling software but had not used it. The current Warden stated the scheduling software has not yet been used due to management's reluctance to change from the handwritten format currently used. The county CFO reported that he was not aware that MCCC had such software and that he had been looking into purchasing scheduling software for the facility.

The start-up cost of this scheduling software ranges from \$189 to \$6,000. In addition,

there is an annual user fee which ranges from \$69 to \$95 per user.

Facility management should consider the use of automated overtime calling systems and scheduling software to ease administrative burdens and reduce overtime expenses.

Overtime for High-Ranking Jail Officials

We found that in certain counties, the warden, captains or other high-ranking jail officials whose duties are primarily administrative or managerial are not eligible to receive overtime. For example, in Bergen and Cape May counties, policy prohibits captains from receiving overtime. In contrast, according to the UCJ Director, captains are permitted to work overtime shifts for lower-ranking officers while still receiving pay at the captain rate. Captains are also authorized to receive administrative overtime. In 2011, one captain received \$191,000 in total compensation. This included his \$130,000 salary and \$61,000 in overtime pay. This far exceeded the compensation paid to any other UCJ employee, including its Director.

Administrative Overtime

Facility management should discourage the use of overtime for administrative personnel or to complete non-time sensitive administrative tasks because it may lead to increased overtime spending. For example, in 2011 and 2012, Union County Jail spent approximately \$140,000 and \$199,000, respectively, on what the Director describes as “administrative overtime.” This overtime was not used to fill vacant job assignments,

but rather to finish administrative tasks or respond to unexpected situations, such as gang disturbances. The facility should continue to monitor its administrative overtime spending and look for ways to reduce the amount spent on administrative tasks.

Vacant Positions

Our review found that high levels of staffing vacancies can lead to an increase in overtime costs. As with absences due to leave and other reasons, vacant posts are generally filled with officers working overtime until a replacement can be hired. In civil service counties, an eligible civil service candidate may not be readily available to fill a vacancy due to county residency requirements, the timing of the civil service examination or other reasons. Any delay in hiring creates an additional expense because the vacant post is filled with an officer working overtime, rather than an employee being paid the regular rate.

Training Academy Issues

One factor that may have an indirect effect on overtime spending is the availability of newly hired officers undergoing training at the training academy. As discussed previously, any delay in filling vacant posts causes additional expense to the facility in the form of added overtime costs. State law, *N.J.S.A. 52:17B-68.1(a)*, requires county corrections officers to attend a basic training course approved by the Police Training Commission prior to permanent appointment. However, pursuant to *N.J.S.A. 52:17B-68.1(b)*, a person can be appointed

as a county corrections officer on a probationary basis for a period of one year, giving the individual a one-year period of probationary employment within which to complete the required basic training course. We found a facility may be able to fill its vacant posts quicker if it offers on-the-job training to new employees rather than waiting to start the new employee until after a training academy becomes available. By offering on-the-job training to employees prior to their attendance at the training academy, a facility can reduce the length of time a post is vacant, thereby reducing the amount of overtime necessary to fill the vacancy.

Union County provides a good example of how the availability of the training academy can affect overtime. In Union County, the Director of UCJ indicated that in recent years he has had difficulty maintaining the optimal staffing level at the facility due to an inability to hire and train additional officers in a timely manner. According to the Director, even though he was budgeted to hire new officers to fill vacant posts, he could not fill the posts in a timely manner because there was no training academy class for the new officers to attend.

At UCJ, new officers must attend the training academy before they begin working at the facility. The Director said the reason for the UCJ policy is related to both safety concerns and pension eligibility and contribution rules. This differs from other county correctional facilities, where officers are provided on-the-job training and then begin work on a probationary basis until the basic training course is offered. In this way,

other correctional facilities are able to resolve the staffing shortage more efficiently, while still ensuring that new officers are appropriately trained and supervised.

VI. Conclusions and Recommendations

In view of the high costs of overtime in some adult county correctional facilities, it is important for each county facility to be properly staffed and to have appropriate administrative and financial oversight. With these controls in place, facilities should see a reduction in overtime spending.

The following are general recommendations intended to assist New Jersey's adult county correctional facilities in controlling overtime spending.

1. Facilities should make an affirmative effort to review and monitor overtime costs.
2. Facilities should have a written staffing plan as required by *N.J.A.C. 10A:31-8.15(a)*. The staffing plan should be updated annually. Staffing plans should be based on a comprehensive staffing analysis that takes into account the various factors noted in the N.I.C.'s *Staffing Analysis Workbook for Jails (Second Edition)* or other facility-specific factors. Staffing analyses should be updated as needed to reflect any changes in inmate population, demographics, staffing levels, construction, special populations, special assignments or other unique considerations.

3. Facilities should keep logs or records of their overtime usage and the rationale for its use, such as backfilling a position, medical transport or gang issues. Any memos or other documents authorizing overtime should be retained for six years and available for review. Facility management should analyze these logs regularly to determine any patterns and factor these into their annual staffing analysis.
4. Facility management should have sufficient discretion to determine appropriate staffing for the facility. Management should attempt to ensure that minimum staffing levels are met before discretionary days off, such as personal, administrative, compensatory or banked holidays are granted.
5. As CBAs come up for renegotiation, facilities should seek to minimize the number of situations in which overtime pay is contractually required. CBAs should provide management with sufficient discretion to manage staffing decisions appropriately and ensure that open posts can be filled.
6. Facility management should consider the use of automated overtime calling systems and scheduling software to ease administrative burdens and reduce overtime expenses.
7. Facility management should seek to make high ranking officials ineligible to receive overtime.
8. Facility management should discourage the use of overtime for administrative tasks. Where necessary, management should maintain records of administrative overtime to ensure it was necessary and appropriately authorized.
9. Counties should attempt to fill vacant slots as expeditiously as possible. If a training academy is not available at the time of hire, counties should consider providing on-the-job training until one is available. This should alleviate immediate staffing vacancies.