

# MEMORANDUM

**State of Alaska**  
**Department of Administration**  
**Division of Personnel**

**To:** Mila Cosgrove  
Director

**Date:** October 1, 2005

**From:** Sarah Brinkley  
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**Subject:** Correctional Superintendent Study

**Preamble:**

In April 2005 the Department of Corrections requested a salary review of Assistant Correctional Superintendents and Correctional Superintendents to address anticipated recruitment difficulties as they sought to simultaneously fill numerous vacancies in these classes. They also requested that the Division consider creation of a second, higher level single-position job class to distinguish the Anchorage Correctional Complex Superintendent based on the facility's 819-bed emergency capacity, driving the position's greater complexity relative to all other Correctional Superintendent positions. In late July 2005 the study was initiated. By that point, study priorities had changed due to the then urgent need to proceed with recruitment. The Department of Corrections amended its study objectives and asked to segment the study, initially asking only for the establishment of a Correctional Superintendent II job class unique to the Anchorage Correctional Complex Superintendent position, and allocation of all Correctional Superintendent positions to the new levels I and II. At a later date the Department might resurrect its request for a salary review of Assistant Correctional Superintendents, and potentially request creation of a new single-position Correctional Superintendent III job class if construction of the proposed new 1,200 – 1,250 bed Mat-Su area adult correctional facility is funded.

**Study Scope:**

This study focuses only on the dozen Correctional Superintendent positions within the Department of Corrections.

**Study Method:**

The Department submitted updated position descriptions for positions in the study on June 30, 2005, with signed hard copies arriving a few days later. This analyst reviewed the position descriptions, and then toured the Juneau Lemon Creek Correctional Center (LCCC), the Anchorage Correctional Complex (ACC), and the Eagle River Hiland Mountain Correctional Center (HMCC) to gain an understanding of adult correctional facility operations and administration in general, and how ACC is unique among the state's facilities. Interviews were conducted with an assortment of staff, including the Director of the Division of Institutions, the acting Correctional Superintendent of LCCC, an Assistant Correctional Superintendent at ACC, the Correctional Superintendent of HMCC, and numerous Correctional Officers at all three

facilities. Superintendent positions were then analyzed for grouping into job classes. Draft definitions and distinguishing characteristics for the resulting job classes were developed and distributed to the Department for review and comment. No comment was received, and only slight modifications were made. The remaining sections of the class specifications were drafted and submitted to both the Department and select Div. Personnel staff for review and comment, and after considering their recommendations, the specifications were finalized.

Position descriptions were reviewed again, against the new class specifications and draft allocations, BU placement and FLSA determinations were made.

The new job classes were analyzed for internal alignment within the state's pay plans and the preliminary results provided to the Department and select Div. Personnel staff for review. The Department concurred with the analysis and range assignment, and the internal alignment analysis was finalized. Due to the Department's high need to fill several remaining Superintendent vacancies, the new job class specs were posted prior to study implementation.

After an email exchange with the DOC Commissioner to clarify supervisory responsibilities for three of the dozen study positions, BU placement and FLSA determinations were finalized, the study process was documented and the study implemented.

### **History of Job Class:**

The Correctional Superintendent class specifications were originally developed in 1972 and assigned to range 20. In 1982 the job class was divided into two levels assigned to ranges 19 and 21, based on differences in scope, complexity, variety and impact of the correctional programs within the facilities, which by the very nature of their operations is reflected in the *size* of the physical plant, staff supervised, inmate population, operating budget, etc. Department opinions varied over the need for two levels and various subsequent requests for class consolidation were submitted but not implemented. Minor class specification revisions were made in 1983 and 1991. In 1997, level I was reassigned from range 19 to range 20. A further minor change was made in 1999. At the department's request, another full review was conducted in 2002, resulting in the collapsing upward of the two-tiered series to Correctional Superintendent, range 21, regardless of facility assignment. Further minor class specification revisions were made in 2002 and 2003.

### **Class Analysis:**

Correctional Superintendents manage and direct the operations of a 24-hour adult correctional facility. These positions serve as the primary liaison between the facility and other criminal justice agencies, community groups and the media. Positions are responsible for risk management, planning, staff supervision and training, inmate and facility management, rehabilitation programs, budget, and policy review and development. Correctional Superintendents directly and indirectly supervise staff overseeing security, maintenance, food service, education, inmate rehabilitation, administration, warehouse and janitorial operations. Levels within the series are distinguished by the characteristics and complexity of the facility managed.

These dozen positions are located in Juneau, Anchorage, Fairbanks, Palmer (2), Bethel, Ketchikan, Nome, Wasilla, Eagle River, Kenai, and Seward. All Correctional Superintendents

report to the Director of the Division of Institutions but the ACC superintendent is unique in being granted greater latitude to exercise independent discretion and judgment in facility management and oversight. Maintaining order and consistency of practice and policy application is paramount in the correctional field, and therefore the Correctional Superintendents I, although tasked with the demanding challenge of managing a facility's inmate population and its staff, are still kept on a limited leash and expected to consult higher management on many issues of significance or controversy prior to taking action. Across the board, Correctional Superintendents directly supervise an array of professional level secondary managers within their facility, who in turn directly and indirectly supervise all facility staff in provision of housing, clothing, food services, education, training programs, work opportunities, recreation, religious activities, counseling, and medical treatment for inmates.

The state's classification plan provides for the grouping of positions into job classes when they are sufficiently similar with respect to duties and responsibilities, degree of supervision exercised and received, and entrance requirements so that: 1) the same title can be used to clearly identify each position; 2) the same minimum qualifications for initial appointment can be established for all positions; 3) the same rate of basic pay can be fairly applied to all positions; and 4) employees in a particular class are considered an appropriate group for purposes of layoff and recall. Job classes should be constructed as broadly as is feasible as long as the tests of similarity are met.

Since the chief aim of this job class study was to isolate and elevate the ACC superintendent position, development of class specifications and allocation of positions proceeded in a manner somewhat counter to standard study process, wherein bodies of work are analyzed with few preconceived notions of what new or revised structure may result. Instead, this study focused on identifying those characteristics of the ACC superintendent position that separate it from all other Correctional Superintendents. The DOC Commissioner's premise was that ACC's 168% emergency bed capacity of 819 relative to the next largest facility (Spring Creek, 486), and 377% capacity relative to the average capacity of the other eleven institutions (217), was a significant driver in the demands facing the ACC superintendent. Facility size matters.

Correctional Superintendents belong to a professional, managerial series in which there is an emphasis on planning, organizing, directing and controlling resources and program delivery. The work is analytical, evaluative, interpretive, and requires a range and depth of specialized knowledge typically acquired through on-the-job training and ascension through a series of related positions in the correctional field, of progressively greater responsibility and scope.

Correctional Superintendents I manage and direct the operations of the current eleven small to moderate sized adult correctional institutions. Incumbents may make decisions or take actions on noncontroversial issues for the facility but for more complex matters, will instead supply information and options to higher management for their consideration and action. Public scrutiny is moderate, and incumbents may be called upon to provide facility tours or participate in local groups as the department representative. Incumbents may have limited legislative contact after discussing the issues of concern with higher management, and may prepare information for higher management's presentations to the legislature. Correctional Superintendents I have the authority to respond to press inquiries for basic information about the

facility's inmate population, and release public safety information about inmate escapes or parolees/probationers who have violated the terms of their release.

In contrast, the Correctional Superintendent II is a single-position class responsible for the management and direction of operations of the Anchorage Correctional Complex. The incumbent has substantial authority to commit the facility's resources to a course of action, and is frequently tasked with making decisions or taking actions that have the potential to significantly impact the division's ability to achieve its overall mission. Public scrutiny is high due to the facility's Anchorage location and its use as the central transfer point for all inmates in the State's adult correctional system. The incumbent makes persuasive presentations to groups and governmental entities on programmatic needs and priorities, and responds to public comment about controversial facility issues. The Correctional Superintendent II has significant legislative contact in concert with higher management, making presentations and/or testifying on specific budget or programmatic issues. The incumbent is authorized to provide information to the press or respond to press inquiries regarding the role of the Anchorage Correctional Complex in the community, and may discuss policy issues, budgetary needs, and operational concerns to assist in building local support for departmental priorities.

Class Title:

A class title should be the best descriptive title for the work. It is intended to concisely and accurately convey the kind and level of work performed and should be brief, easily recognized, gender neutral, and understood by potential applicants.

"Correctional Superintendent" remains the clearest and most concise descriptor of the work performed by this job class series.

Minimum Qualifications:

The minimum qualifications established for a job class must relate to the knowledge, skills, and abilities needed to perform the work and must not create an artificial barrier to employment of individuals in protected classes. Required training should be limited to the basic formal training that customarily prepares individuals for work in the field. Experience requirements are intended to ensure new employees can successfully perform the work after a period of orientation or familiarization. Required experience should be directly related to the actual duties of positions in the class and should not be equivalent to the work to be performed.

Under previous departmental management, there was an attempt to 'professionalize' the superintendent class through an annual, progressively tighter set of minimum qualifications for the job class, disrupting natural progression up through the feeder ranks of correctional officers in which possession of a college degree is not the norm. However, after a change in administration and change of philosophy, this was recently set aside. After discussion with current departmental high management, ascension through the ranks of correctional officer experience in the facilities is again the clear first choice among avenues into these management positions. Thus the minimum qualifications for both levels of the series involve a substitute option of four years of experience at the Correctional Officer II or Adult Probation Officer II level for the required general bachelor's degree, plus 1-2 years specific experience as a Sergeant, APO III, or Assistant Correctional Superintendent.

**Class Code:**

A Class Code is assigned based on the placement of the job class in the classification schematic of Occupational Groups and Job Families. Occupational Groups are made up of related Job Families and encompass relatively broad occupations, professions, or activities. Job Families are groups of job classes and class series that are related as to the nature of the work performed and typically have similar initial preparation for employment and career progression.

Correctional Superintendent I assumes the place in the class outline of the former Correctional Superintendent class, P7657, within the P76xx Rehabilitation and Security job family, and the larger P7xxx Legal, Judicial and Law Enforcement occupational grouping. Correctional Superintendent II is assigned to sequential class code P7658 within the same job family and occupational group.

**Fair Labor Standards Act**

The positions in this study are covered by the minimum wage and maximum hour provisions of the Fair Labor Standards Act of 1938, as Amended (FLSA). While exemption from the provisions of the Act are determined based on the specific circumstances of an individual employee on a work-week basis, there are general aspects of the classes and their influence on the exemptions for employees in bona fide executive, professional, or administrative positions that can be addressed in general.

The defining characteristics of the Correctional Superintendent series include the primary duty of management and oversight of one of the current dozen adult correctional facilities. Positions would not typically be allocated to these classes if the management responsibilities did not include direct supervision of more than two subordinates. Given these characteristics, employees in full-time salaried positions in these classes would typically meet the *executive* criteria for exemption from the FLSA's overtime provisions.

To qualify as a bona fide administrative employee under the FLSA, an employee must perform office or non-manual work directly related to the management or general business operations of the employer or the employer's customers. The revised regulations effective August 23, 2004, state that exempt administrative work includes a wide variety of persons who either carry out major assignments in conducting the operations of the business, or whose work affects business operations to a substantial degree, even though their assignments are tasks related to the operation of a particular segment of the business. While the operating authority of Correctional Superintendents I is limited to routine and non-controversial areas, the defining characteristics of the Correctional Superintendent series include the primary duty of facility management that directly influences the way in which the system collectively performs its assigned functions. This primary duty meets the intent of the administrative regulations regardless of the facility in which it is performed. Employees in full-time salaried positions in these classes would typically meet the *administrative* criteria for exemption.

**Position Allocation:**

PCNs 204101, 204200, 204301, 205131, 205307, 206101, 206401, 206500, 208001, 208138, and 208801 provide management and oversight of one of the adult correctional system's small to moderate-sized facilities, 58 - 486 bed emergency capacity. They directly and indirectly supervise the full facility staff covering security, maintenance, food service, education, inmate

rehabilitation, administration, warehouse and janitorial operations. Basic responsibilities in each case include risk management, planning, staff supervision and training, inmate and facility management, rehabilitation programs, budget, and policy review and development. These positions are all required to check back in with higher management for issues and concerns elevating about normal/routine, and are not authorized to interact independently with either legislative members or the press. Although some difference does exist among these positions in terms of facility size, inmate population and staff size, operating budget size and complexity, and level of programmatic functions overseen, those differences are modest compared with those of this entire group compared to the ACC superintendent position.

Based upon the new class specs, these eleven positions are appropriately allocated to the Correctional Superintendent I level at range 21. Consistent with class intent, these positions remain in the Supervisory bargaining unit and are exempt from overtime based on both the executive and administrative criteria of the Fair Labor Standards Act of 1938, as amended.

PCN 206601 manages and oversees the Anchorage Correctional Complex, consisting of the newer 2002 East wing and the separate, older 1983 West wing, only recently integrated under consolidated management. Across the two wings the facility is authorized to house up to 819 inmates on an emergency basis. In actuality, daily bed-count averages very close to this maximum, necessitating continuous use of 'boats' within cramped inmate quarters and increasing the inmates per correctional officer ratio. Staff operations and basic responsibilities are consistent with those within the smaller facilities. However, across all characteristics, the ACC is by far the largest and most complex, demanding of the superintendent positions. ACC is authorized for FY06 operations at \$20.1 operating budget across five sources, funding 227 positions. Other facilities range from 58 – 486 emergency capacity inmate beds, with operating budgets of \$2.7 million -- \$15.9 million, 1 – 2 funding sources, and 22 – 181 authorized staff. Greater inmate population and greater staff size at ACC drive an increase in the number of actions requiring personal attention by the superintendent: inmate and/or staff grievances, discipline actions, ADA filings, investigations for suspected criminal activity, in addition to inmate lost/damage property complaints, inmate classifications and staff FLMA filings.

ACC faces increased pressure due to a higher total weekly visitor count, the chief avenue through which contraband items flow. Increased inmate/visitor contact tends to temporarily mollify the facility's inmate population attitude and general demeanor, but also escalates the incidence of contraband items discovered and seized.

ACC also serves as the central transportation point for all Alaskan inmates requiring transport through or in & out of the state, which translates to a more transient and less stable inmate population. Unsentenced inmates facing as of yet determined correctional future display less buy-in to the correctional system and less care for its standard practices and principles; thus an unsentenced population tends to act out to a greater extent than those whose fate has been determined. Many facility populations include an unsentenced proportion, but none so high as at ACC, the hub of transfer activity within the system.

Based upon the new class specs, this single position is appropriately allocated to the Correctional Superintendent II level at range 22. Consistent with class intent, this position remains in the

Supervisory bargaining unit and is exempt from overtime based on both the executive and administrative criteria of the Fair Labor Standards Act of 1938, as amended.

**Internal Alignment:**

The salary range of a job class is determined based on internal consistency within the state's pay plans, in accordance with merit principles, with the goal of providing fair and reasonable compensation for services rendered and maintaining the principle of "like pay for like work." In evaluating internal consistency, the difficulty, responsibility, knowledge, skills, and other characteristics of a job are compared with job classes of a similar nature, kind, and level in the same occupational group and job family or related job families.

In examining the internal alignment of the Correctional Superintendent classes, the class characteristics were compared with numerous job classes in two particular job families, Rehabilitation and Security (76xx) and General Administrative (19xx), where greatest similarity of work exists with that assigned to Correctional Superintendents. At varying levels the following job classes are all involved in the management and administration of State institutional facilities: Assistant Administrator, Anchorage Pioneers' Home (21), Pioneers' Home Administrator I (23), Pioneers' Home Administrator II (24), Juvenile Justice Superintendent I (19), Juvenile Justice Superintendent II (21), Juvenile Justice Superintendent III (22), Assistant Director, Division of Institutions (22), and Deputy Director, Corrections (23). These classes were used as comparison points with the Correctional Superintendent I class, in which incumbents manage and direct the operations of a small to moderate sized adult correctional institution, maintaining appropriate control and custody of inmates and providing necessary services and rehabilitation programs within a secure environment.

For each of these job classes, the standard classification factors were carefully evaluated: the scope, nature and variety of preponderant duties; the size and complexity of programs and facilities; the type, scope, and level of knowledge required; the nature of supervision received; the level of independence in performing recurring duties; the guidelines used in decision making; the nature and scope of originality required in decision making; the nature of work relationships outside the supervisory chain; the nature and scope of recommendations and decisions made; and the consequences of errors by prudent employees.

Correctional Superintendents I lack the statewide focus of the Pioneers' Home Administrator II (24), Assistant Director, Division of Institutions (22) and Deputy Director, Corrections (23) but surpass the scope of the assistive role assigned to Assistant Administrator, Anchorage Pioneers' Home (21).

Juvenile Justice Superintendents differ from Correctional Superintendents in that the facilities they manage are generally smaller and thus less complex, but juvenile corrections' chief emphasis is on treatment and rehabilitation, which is only a minor component in the adult system, where the main concern is risk management. Juvenile Justice Superintendents I (19) manage the smallest of the juvenile facilities or a single unit of the largest facility, which does not compare to the scope of oversight of the small to medium sized adult correctional facilities. The Juvenile Justice Superintendent II (21) directly oversees a medium youth facility and indirectly manages two other facilities through lower level superintendents. The Juvenile Justice Superintendent III (22) directly oversees the largest juvenile facility and indirectly manages a

number of others through lower level superintendents. (The eight juvenile correctional centers range from 10-160 beds, with an average of 37 bed each, whereas the dozen adult correctional facilities range from an emergency capacity of 85-819, with an average of 267 beds apiece.) Considering all factors, Correctional Superintendents I most closely parallel the Juvenile Justice Superintendent II.

The degree of independence assigned to Correctional Superintendents I is less than that of both the Pioneers' Home Administrators (21, 23, 24) and the Juvenile Justice Superintendents (19, 21). Greater responsibility and control in the adult corrections system is retained by the central management, and homogeneity of practice and principle across the entire system is encouraged. Within the small to medium adult correctional facilities, actions and decisions of a controversial nature are referred to higher management, and the Correctional Superintendent I's authority to make legislative and press contact is limited in nature.

Because of the oftentimes unstable and volatile nature of the corrections population at both the juvenile and adult levels, dangerous situations do regularly occur within facilities and require facility managers to be capable of making informed and reasonable split-second decisions to protect the inmate population, staff, and the public from bodily harm or even death. The consequence of error in judgment, omission, or actions by juvenile (19, 21) and adult correctional superintendents can be significant and permanent. The nature of person-to-person contacts in the correctional world poses a risk to juvenile and adult facility superintendents, their staff and the visiting public which simply is not a factor in the relationships that Pioneers' Homes administrators (21, 23, 24) must manage.

Clearly there is variation among the classification factors in the relative degree of authority and responsibility assigned to Correctional Superintendents I. Since the State utilized whole job analysis, no single factor predominates. Comparing institutional responsibility, programmatic responsibility, authority to make programmatic changes, and the impact of the position on the health and safety of inmates, staff and the public indicates Correctional Superintendent I is most appropriately assigned range 21, the current range for the existing single-level series.

Then the issue becomes identification of the characteristics separating the levels within the Correctional Superintendent series. For the majority of the Correctional Superintendent class' existence, the conviction within the Department of Corrections and Personnel as well has been that in this case, size of institution does indeed drive complexity of the job, and thus the relative level of responsibility. Anchorage Correctional Complex has a current complement of four second-level manager positions immediately beneath the Superintendent – two Assistant Superintendents and two Correctional Officers IV. This is in contrast to the other eleven adult facilities' structure, where 0-2 second-level managers are able to provide adequate support to the Superintendent in oversight of facility staff and operations. Operating budget size and complexity, physical plant size, the number and nature of programmatic functions, and diversity of both the facility's position classifications and the classification and ethnicity of the inmates are all significantly greater at the Anchorage facility than elsewhere. The larger inmate population and the fact that the Anchorage facility is used as the central inmate transfer point among all the outlying facilities both drive the need for a larger staff, which increases the planning necessary to handle shift scheduling, staff training, staff performance monitoring and evaluation, and investigations of allegations of staff misconduct. The greater facility population



size also increases the chances that two or more inmates with a history of conflict with each other will be co-located, increasing the need for timely and accurate inmate classification, general population surveillance and rapid response to incidents. Prisoner grievances, disciplinary actions and property issues increase in proportion to facility size and all require direct action by the Superintendent II.

The standard two-range increment commonly found between levels in a series where positions at the higher levels supervise positions at the lower level is not applicable in this case; therefore a one-range difference between Correctional Superintendents I and II is established, and Correctional Superintendent II is assigned range 22.

**Conclusions:**

The Department of Corrections requested establishment of a new, higher level Correctional Superintendent II job class unique to the Anchorage Correctional Complex Superintendent position, to recognize its greater complexity and authority relative to all other Correctional Superintendent positions. The current single-level Correctional Superintendent job class specifications are replaced by a two-tiered series that acknowledges these greater responsibilities assigned to the head of the system's largest facility.

Correctional Superintendent (P7657) is replaced by Correctional Superintendent I (P7657) at range 21, and Correctional Superintendent II (P7658) is established at range 22. Effective October 1, 2005, all Correctional Superintendent positions are allocated to the new levels I and II.

Attachments:

Final class specifications  
Allocations grid

cc: Marc Antrim, Commissioner  
Department of Corrections

Michael Addington, Director  
Division of Institutions  
Department of Corrections

Shar Griffin, Director  
Division of Administrative Services  
Department of Corrections

Management Services – Public Protection Group

Technical Services – Public Protection Group

Employee Services

Employee Records (original PDs, FLSA worksheets & copy of memo)