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Deborah Slack-Bean
Senior Attorney
New York State Commission of Correction
Alfred E. Smith Building
80 S. Swan Street, 12th Floor
Albany, NY 12210

Re: Comments on New Regulations to Enhance Oversight of Solitary Confinement in All Local Jails

Dear Ms. Slack-Bean:

I appreciate Governor Cuomo's desire to increase oversight of the use of solitary confinement in local jails. However, I am disappointed at how little his proposed regulations do to curb the abuse of solitary confinement.

International law states that placing *anyone* in solitary confinement for more than fifteen days is torture—and yet the new regulations fail to put any limit on the length of time an individual can spend in solitary. They merely require that decisions to place inmates who are pregnant or under the age of eighteen in solitary be reviewed by the Chief Administrative Officer and that decisions to place any inmate in solitary for more than one month be reported to the Commission of Correction. What, exactly, the Commission of Correction does after receiving this information is unclear.

Equally as concerning, these new regulations make no provisions for people with mental illnesses—people who are disproportionately likely to serve time in solitary confinement and who arguably suffer from it the most. Numerous studies—most recently, one conducted by members of Stanford University's Human Rights in Trauma Mental Health Laboratory—show that even people without mental illnesses develop impairments due to extended time spent in solitary confinement.

Rather than issuing new regulations that merely sound progressive, Governor Cuomo should support the Humane Alternatives to Long-Term (HALT) Solitary Confinement Act, A.3080/S.4784. HALT limits how long someone can be placed in solitary confinement and who can be placed there. It also changes the nature of solitary confinement itself by requiring that inmates have access to six hours of programming and therapy each day.

Sincerely,

Rebekah Kimble