

350 Richmond Terrace  
Apt. 4R  
Staten Island, NY 10301

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Deborah Slack-Bean, Esq  
Senior Attorney  
NYS Commission for Correction  
Alfred E. Smith Building  
80 S. Swan ST, 12th Floor  
Albany, NY 12210

Dear Ms Slack-Bean,

I read with dismay Gov. Cuomo's proposed regulations on solitary confinement, which seem to be either uninformed or do not consider the extensive research on this form of torture. The UN defines two weeks in solitary confinement as torture. The US prisoners of war held in Korea and Vietnam described it as torture, yet NYS has had a minimum of two weeks for solitary confinement.

Some of the worst aspects of this form of punishment are included in these regulations, such as not explicitly allowing any time out of it to be with other people. The regulations appear to have been drafted solely with conjunction with the wardens and other jail administrators and with no recognition of the severe social and psychological harm this kind of torture does. The phrase justifying solitary for 24 hours a day "for safety, security and good order" can be used for anything, such as having two pairs of socks, or an untidy cell (for which people have experienced long sojourns in the SHU, as well as more serious offenses.

The HALT Solitary Confinement Act A3080/S4784 is the most comprehensive of several acts to humanize the present use of the SHU. It requires a maximum limit of 15 consecutive or 20 days total in any 60-day period, and that any isolation must involve at least 7 hours out of cell, with 6 hours of group/rehab/therapy programming. People under 21 and more than 55 years if age should be exempt from even a day of solitary, and alternatives should be considered to enhance procedural protection of inmates. And, unlike the proposed regulations these should apply to all jails and also to all NYS prisons.

New York State has one of the worst prison systems in the US, with 8% of its prison population in solitary all the time. Colorado, Maine and Mississippi have all cut back on isolation and are finding there is less violence and are also saving money, Gov. Cuomo's proposed regulations do not envisage any major change in the present system. The HALT Act offers a more humane and probably cheaper way to change the system, as well as offering inmates less certainty of recidivism.

Yours truly,

Richenda Kramer