



Restrictive Housing Rulemaking

Summary of Public Oral Testimony on Proposed Rule
March 9 – April 23, 2021

Date	Name	Summary of Testimony
March 9, 2021 Public Board Meeting (Rule is Proposed)		
3/9/21	Mary Lynne Werlwas	The Board has not learned from ESH’s mistakes and this proposed Rule allows shackling as long as it is “individualized.” The Rule also allows indefinite punishment.
3/9/21	Jennifer Parish	The proposed Rule is inadequate, missing key features, and has highly restrictive housing units that will be solitary confinement by a different name. Requested the Board post diagrams/photos of areas of NIC and GRVC that are models for the new proposed units.
3/9/21	Kelsey De Avila	The Rule proposes a barbaric structure that replaces real out-of-cell time with a cage. Human interaction will involve talking to someone in the adjacent cage. This is solitary by another name.
3/9/21	Frances Geteles-Shapiro	The proposed Rule makes minimal changes to extreme isolation and puts forth a new plan to keep people isolated.
3/9/21	Daniele Gerard	RMA is solitary by another name.
3/9/21	Melanie Brown	Discussed sister Layleen Polanco’s death while in solitary confinement. Said RMA gives officers too much discretion in placements and progression through the program. RMA provides insufficient human interaction – it’s solitary by a different name.
3/9/21	Martha Grieco	DOC is strictly a security organization – not a medical, social work, or legal organization. The proposed Rule should not entrust DOC to be all these things.
3/9/21	Scott Paltrowitz	The proposed Rule does not eliminate solitary confinement – it is solitary by another name. It allows people to be held in restrictive housing indefinitely. Holding people in cages for months (or indefinitely) is unacceptable. RMA is the exact opposite of CAPS and other recommended alternative programs for isolation. People should be allowed to engage with each other as human beings, not by speaking to each other through cages.
3/9/21	Corina Minden-Birkenmaier	Read a statement from a person who spent time in solitary in an NYC jail: There is no representation before placement into solitary. The appeal process is “a joke.” There is no recreation (rec is called at 5am when people do not want to participate) and it is provided in a cage. Law library is not provided, or it’s afforded too early for people to participate. Even people who “seem normal” start to behave erratically in solitary. Provide more programs, not harsher punishment.
April 13, 2021 9:00 AM Public Hearing on Proposed Rule		
4/13/21	Keith Powers	People in custody should receive access to counsel in disciplinary hearings. All RMA Levels should have definitive time limits with a cap on how long people can be kept in these units. The Rule should address violence and make a cultural shift for DOC.
4/13/21	Helen Rosenthal	The Board should listen to recommendations from formerly incarcerated people and advocates. People in custody should receive legal representation in disciplinary hearings. There should be limits on time spent in RMA (Level 1 should be limited to 15 days or less). There must be placement exceptions for the following groups: 25 and younger; 55 and older; people with mental health needs, disabilities, or medical conditions, and comorbidities. Chains and shackles should not be used during out-of-cell time.
4/13/21	Daniele Gerard	RMA is solitary by another name. The cage areas do not provide meaningful human engagement. There should be time limits for how long people can be held in these units. Young adults should be housed separately from adults and should receive an additional 7 hours of programming (in addition to the 14 hours out-of-cell). Reiterated that the UN has called for the full prohibition of solitary confinement for pre-trial detention.
4/13/21	Melania Brown	RMA is solitary by another name. Her sister Layleen Polanco would not be alive today even if she had been in a slightly larger cell. RMA does not provide meaningful human

Date	Name	Summary of Testimony
		interactions and people placed next to each other (expected to talk through separate cages) may not get along with each other.
4/13/21	Susanna Eckblad	RMAS is solitary by another name. It provides no time limits (allowing people to languish in extreme isolation indefinitely) and has a narrower list of placement exclusions than current solitary confinement. Young people, older people, people with disabilities and medical conditions (including seizure disorders) should be excluded from RMAS.
4/13/21	Jorge Marin	Officer who said the proposed Rule falls short and there are many deficiencies in the jails for both people in custody and staff.
4/13/21	Anisah Sabur	Discussed her experience spending 61 days in solitary confinement on Rikers Island. RMAS is moving people from one cage to another. Placing people in cages is inhumane and people should not have to communicate through cages. People in custody deserve legal representation at disciplinary hearings to advocate on their behalf.
4/13/21	Gary Williams	Officer who said there should be a punishment for assaults and violent behavior. PSEG is a necessary tool to prevent people from harming others. Many people are afraid of the gang violence in the jails, and some would rather be in segregation for their safety.
4/13/21	John Lopez	Officer (retired) said some people in custody are very violent with intermittent explosive behavior. RMAS appears to be a good program but there is a systemic lack of resources in the jails, specifically a lack of mental health professionals and officers.
4/13/21	Brandon Holmes	The Board should adopt the suggestions and recommendations provided by advocates.
4/13/21	Darleen McDay	Discussed her son's experience in solitary confinement in a NY State prison. Discussed officer misconduct and said the Rule should be tight to prevent officer abuse of people in custody. People also deserve legal representation in disciplinary hearings.
4/13/21	Jack Back	The proposed Rule does not define out-of-cell time and the cage structure outside the cell is inadequate for social interaction. The Rule should provide a separate out-of-cell programming space where residents engage in congregate, therapeutic activities.
4/13/21	Scott Paltrowitz	The proposed Rule is solitary by another name. It does not go as far as the HALT Solitary Confinement Act. RMAS Levels 1 and 2 are segregated confinement and HALT prohibits spending more than 15 consecutive days in segregated confinement.
4/13/21	Simone Spirig	The proposed Rule's current definition of restrictive housing and restrictive status fails to account for many of DOC's unofficial practices (see BDS's written comments).
4/13/21	Olga Delgado	Discussed her son's experience in solitary confinement. People should be allowed out-of-cell time in large spaces with a group of other people to engage in meaningful human interactions. The Board should end solitary confinement completely.
4/13/21	Lauren Teichner	Discussed her client's experience in NIC's restrictive housing area. Said the Board should not create more units with this structure for RMAS housing.
4/13/21	Hanna Perry	People in custody deserve legal representation to advocate for them in disciplinary hearings. NYC public defenders' offices have volunteered to take on costs associated with providing this representation.
4/13/21	Eugenie Montaigne	RMAS's out-of-cell time is in a slightly larger structure than solitary and there are no time limits for how long people can be in these units (could be held indefinitely). People need legal representation at their hearings to challenge placements and meaningful programming (not in-cell materials to work on independently).
4/13/21	Harmony Seaburg	People should receive access to representation during disciplinary hearings to ensure proper due process.
4/13/21	Ashaki Antoine	The proposed Rule removes monetary fines for infractions and this lack of accountability will empower people to engage in violent and assaultive behavior. The proposed Rule caters to people in custody and encourages increased assaults on officers.
4/13/21	Lucia Alonso	RMAS is solitary by another name. The cage structure will not provide meaningful human engagement (which must include more than just one other person). People in custody need pro-social programming during out-of-cell time.
4/13/21	Darren Mack	Discussed his experience in solitary confinement. The Board should eliminate people being sent to RMAS for non-violent offenses like possession of drugs or tobacco products. People deserve access to counsel or other legal representation for disciplinary hearings.

Date	Name	Summary of Testimony
4/13/21	Sergio De La Pava	RMAS falls short of abolishing solitary confinement. People also need access to counsel or legal representation in disciplinary/placement hearings. There should be a limit on the time spent in these units.
4/13/21	Frances Geteles-Shapiro	The proposed Rule creates solitary by another name. There will be no meaningful human interaction provided in the cages. There is no legal representation for placement hearings, and there are no time limits on how long people can be in these units.
4/13/21	Victoria Phillips	No one should be placed in solitary confinement, be shackled, or held indefinitely. People should receive legal representation for disciplinary hearing.
4/13/21	Kayla Simpson	The proposed Rule codifies failed experimental restrictive housing areas such as ESH and NIC. It places people in cages, provides no congregate activities, no real programming, and no time limits (could keep people held indefinitely).
4/13/21	Benny Boscio	Punitive segregation is necessary for the small population of violent and assaultive people in custody. These individuals assault officers and other people in custody and repercussions for violent behavior do not exist in the proposed Rule.
4/13/21	Irene Cedano	The proposed Rule is solitary by another name. RMAS Level 1 confines people to a cell and adjacent cage for 23 hours per day without meaningful human interaction. People must have access to meaningful out-of-cell time, outside of the cell/cage area.
4/13/21	Claudia Forrester	The proposed Rule lacks specificity and allows DOC to make arbitrary determinations about program participation that is needed for progression in RMAS Levels 1 and 2. People will languish in these units indefinitely.
4/13/21	Naomi Schmidt	Read a statement from a person in custody who has been in solitary and restrictive housing for six months: In solitary people do not take the 1 hour of recreation due to officers threatening them if they do and people have no representation in disciplinary hearings. In ESH, there is very limited access to medical and mental health services.
4/13/21	Jennifer Parish	The Board has not made a design of the RMAS housing units public. The units at NIC and Secure (inspiration for RMAS) will not provide meaningful human interaction and do not end solitary confinement.
4/13/21	Richard Sarno	Officer said there are incarcerated people who are continuously assaultive and violent. He asked advocates how DOC should manage individuals who physically hurt others.
4/13/21	Julia Davis	The proposed Rule places young people (18-21-year-olds) in cage structures and there is no limit on the amount of time they can be subject to this restrictive housing. The Rule is not consistent with how young people are treated at Horizon and other juvenile facilities.
4/13/21	Peter Martinez	Officer said the proposed Rule's Grade 1 offenses do not include spitting. His wife is also an officer and was recently spat on in the face. He advocated for the Board to consider the PTSD, mental health, and physical safety issues that officers face in the jails.
4/13/21	Victor Pate	Discussed his experience in solitary. Said solitary is worse now than it was in the 1970s when he was incarcerated. Urged the Board to end this practice entirely.
4/13/21	Zakya Warkeno	Discussed issues with client's placement and experience in ESH and Secure. DOC cannot be responsible for conducting periodic reviews. People in custody deserve opportunities to represent themselves in placement hearings and in progression decisions.
4/13/21	Markeisha Jacks	Discussed issues with placing young people with mental illness and mental disabilities into isolated confinement. No one should be placed in isolated confinement for 23 hours per day. Urged the Board to officially end the use of isolated confinement.
April 14, 6:00 PM Public Hearing on Proposed Rule		
4/14/21	Antonio Reynoso	The proposed Rule falls short in ending solitary confinement and should be scrapped. People should receive 14 hours out-of-cell each day, with at least 7 hours in congregate programming/activities. People should have access to counsel and legal representation in placement determinations.
4/14/21	Nick Smith	The proposed Rule must be significantly revised to end solitary confinement. RMAS Level 1 only provides 10 hours out-of-cell and the conditions in Levels 2 and 3 are only marginally better. There must be limits on how long people can be placed in these units so they are not held indefinitely. People deserve legal representation during disciplinary hearings (the

Date	Name	Summary of Testimony
		Board should mimic the provisions in the Massachusetts code of regulations). The categories of those excluded from RMAS must be expanded.
4/14/21	Kenny Burgos	The proposed Rule is still a form of solitary confinement that limits opportunities for meaningful engagement and programming. The Board should amend the Rule and commit to meaningfully ending solitary confinement in the jails.
4/14/21	Julia Davis	Young people should not be placed in restrictive settings and cages. This type of restrictive housing, cage-based programming/services, and restraint desks are not permitted for young people at Horizon or for those placed in secure facilities upstate.
4/14/21	Five Mualimm-ak	The proposed Rule is solitary by another name. It provides no access to programming nor any access to counsel in disciplinary hearings. The Rule provides too much discretion to officers in providing in-cell programming. We must address issues in the jails instead of using punitive housing as punishment.
4/14/21	Deandre Simmons	Discussed experience in solitary confinement as a teenager, said young people should not be placed in solitary confinement.
4/14/21	Melania Brown	Discussed sister Layleen Polanco's death while in solitary confinement and inadequate officer conduct. People deserve access to counsel in disciplinary hearings and in placement/progression decisions.
4/14/21	Nina Torres	Discussed son's recent experience in solitary confinement. He suffers from bipolar disorder and does not receive the care he needs. People need programming and mental health counseling.
4/14/21	Alexandra Smith	Shared experiences from clients who have been housed in restrictive settings at NIC, Secure, and ESH. Said the proposed Rule creates solitary by another name.
4/14/21	Omari Moore	Person currently in custody said the proposed Rule is not available to review in the jails. Discussed staffing shortages that negatively impact DOC's adherence to the Board's minimum standards. There is inadequate support for people in general population and especially for people who exit solitary confinement. When the Rule is implemented, a liaison for the Board and a DOC contract employee should ensure the new Rule is implemented correctly. Requested regular meetings between people in custody and the Board to discuss on the ground implementation of the Rule.
4/14/21	Kathryn Sachs , Shona Hemmady	Discussed a person in custody's experience in restrictive housing at NIC: He received only 1 hour of out-of-cell time (outside the cage). The longer he spent confined, the more his mental and physical health declined. The cameras at NIC are helpful in reducing violence. Restrictive housing needs more out-of-cell/cage time, more meaningful interactive programming, and officer training on mental health issues.
4/14/21	Joey Jackson	People in custody and officers deserve respect and should both be treated humanely. The percentage of people in custody held on violent charges has increased significantly and as a result, violence among people in custody has increased.
4/14/21	Octavio Perez	Officer said the Board should not limit consequences for actions, especially violent and assaultive behavior. The people housed at NIC are extremely violent and have repeatedly assaulted other people in custody and staff.
4/14/21	Nicole Valentine	Officer said staff do not go into work to hurt people in custody and they want to treat people humanely, but there should be consequences and punishment for assaultive behavior.
4/14/21	Tarlton Johnson III	Officer said there is a misconception about all officers being aggressive towards people in custody, and people sent to solitary confinement have actually committed violent acts.
4/14/21	Anisah Sabur	There must be restorative methods for people in custody. There should be opportunities to engage in meaningful human interaction and to participate in restorative programming. The proposed Rules should focus on restoring people in custody's mental and physical health.
4/14/21	Darleen McDay	Discussed son's death at a NY State Prison and responded to COBA's testimony.
4/14/21	Mik Kinkead	Discussed positive experience providing programming to transgender people in custody. Emphasized the importance of legal representation and access to counsel in disciplinary hearings.
4/14/21	Jennifer Parish	Emphasized JAC and HALT Solitary's Blueprint to end solitary confinement, which proposed therapeutic settings and meaningful programming. RMAS replicates the most restrictive areas in the jails and does not provide healthy interactions, no congregate

Date	Name	Summary of Testimony
		programming, nor any requirement for steady staff. RMAS Level 1 should be limited to no more than 15 days. Vulnerable populations like young people, elderly people, people with disabilities and medical conditions must be excluded from RMAS. There should also be access to counsel in disciplinary hearings and in the placement/progression process. Program participation should not determine a person's progression through RMAS levels. Strip searches should also be prohibited in RMAS.
4/14/21	Stephany Betances	The proposed rule is solitary by another name. The RMAS exclusion list must be expanded to include young people, older people, people with disabilities and medical conditions. The exclusion list should also be expanded for people diagnosed with an intellectual disability to include all people with neurological, intellectual, and developmental disability. The Rule does not include tools for CHS to accurately assess who meets exclusion criteria. CHS should be required to meet with people in custody in a private, confidential setting immediately prior to any placement in RMAS. The Rule allows services and movement in and out of RMAS to be at the behest of DOC, rather than CHS.
4/14/21	Ashaki Antoine	Discussed people in custody who engage in violent behavior/assault people in custody and staff. Monetary fines should not be removed as they create real accountability for offenses.
4/14/21	Benny Boscio	Officers need punitive segregation to manage the small group of violent people in custody. Officers are working triple tours and the Board and advocates must consider the safety and well-being of officers (most of whom are black and brown).
4/14/21	Mary Rinaldi	RMAS is solitary by another name. Discussed loved one's experience in solitary confinement and the trauma it caused. There must be tools for restorative justice and accountability for city staff and officers.
4/14/21	Jared Trujillo	People in custody need access to counsel in disciplinary hearings. People need 14 hours out-of-cell each day, as well as 7 hours per day of meaningful human interaction. People need meaningful programming to address behaviors that lead to placement. See CAPS, the RSVP program, and San Francisco's Safe program as humane alternatives to solitary.
4/14/21	Miranda Diaz	Officer said it is unsafe in the jails because some people are violent and assaultive. DOC must be able to separate those individuals to protect other people in custody.
4/14/21	Jessi LaChance	Read statement from person in custody who spent time in solitary: Was sentenced to solitary twice and only received a hearing for once. Mental health is inadequate and is provided cell-side, with no privacy. There should be more daily activities and opportunities to interact with other people.
4/14/21	Tahanee Dunn	The proposed Rule does not end isolated confinement, nor does it provide adequate opportunities for people to engage in programming that would support behavior modification. Without time limitations and without access to counsel, DOC has full authority to allow people to languish in RMAS indefinitely.
4/14/21	Lana Green-Hunt	Officer said people must be held accountable for their actions and there must be some consequences when a person in custody commits a criminal act in jail.
4/14/21	Zachary Katznelson	There must be firm caps on time spent in RMAS and the criteria for progression must be tightened as it leaves too much discretion for DOC to deny someone's progression. People also need the right to counsel in disciplinary hearings and progression/placement decisions. There should be steady (trained) staff on every shift.
4/14/21	Ansar Andino	Officer who said ESH and Secure are not effective alternatives to solitary and the young adults (18-21-year-olds) remain highly assaultive to other people in custody and officers. There must be real accountability for violent behavior.
4/14/21	Frances Geteles	The system of controlling and punishing through restrictive housing will never create a safe environment. There must be support for people suffering from mental illness and trauma.
4/14/21	Kelsey DeAvila	RMAS will perpetuate solitary and allow for people to be held in these units indefinitely. The proposed Rule does not provide access to legal representation in disciplinary hearings. The Rule mandates an undefined amount of program participation for progression but denies access to congregate programming.
4/14/21	Zoe Farkas, Constantinos Tsoucal	Read statement from a person in custody who spent time in solitary and restrictive housing at WF: Discussed mental and physical health issues caused or exacerbated by Rikers Island and restrictive housing.

Date	Name	Summary of Testimony
4/14/21	Marco Barrios	Discussed witnessing people being placed into solitary and seeing a worsening of their conditions. People in custody need access to counsel in disciplinary hearings. There should also be counsel for placement and progression in restrictive housing. A lack of program participation should not prohibit people from progressing through RMAS levels. There should also be steady staff assigned to these units.
4/14/21	Richenda Kramer	There is little difference between solitary and RMAS. In some ways, RMAS is even worse because it allows for more than 30 days in RMAS with no specific time limits.
4/14/21	Scott Paltrowitz	Shared pictures of NIC's restrictive housing units obtained via FOIL. People need access to counsel, and 14 hours out-of-cell with 7 hours of meaningful congregate programming. The Board should review the RSVP program in San Francisco, CAPS, and the Merle Cooper program in NY State, which have reduced violence without extreme isolation.
4/14/21	Keziah Norman	Discussed husband's experience in solitary at a NY State prison. People need restorative programming. Solitary is inhumane and creates more violence in the jails.
4/14/21	Lionel Cumberbatch	Officer said the culture of Rikers is unsafe for everyone. There is not enough programming for people in custody during their out-of-cell time, and more programming makes it less likely for a person to engage in bad behavior. There must also be consequences for the small percentage of people in custody who are highly assaultive.
4/14/21	Victoria Phillips	Discussed experience working in the jails and the ill treatment of people in custody.
4/14/21	Hilly Haber	Discussed inhumane effects of solitary confinement.
4/14/21	Pooja Goel, Tina Szpicek, Daad Sharfi	RMAS creates additional punitive, isolated units. People need meaningful human interaction. People need access to counsel and legal representation in disciplinary hearings and throughout the placement review process. Lack of participation in programming should not stop someone from progressing through RMAS levels. Urged the Board to adopt JAC/HALT's Blueprint to end solitary confinement.
4/14/21	Peter Martinez	Officer discussed the violence and gangs in the jails, which creates a small population of extremely violent people who must be separated from others. Many people in custody have mental health issues and need programming. Requested the Board include spitting on officers as a Grade 1 offense.
4/14/21	Sarita Daftary	Emphasized the success of San Francisco's RSVP program. Said the Board should amend the proposed Rule to eliminate isolated confinement entirely. Recommended measures the Board should take to reduce violence in the jails like advocate for the removal of the Commissioner, take over officer disciplinary proceedings, and advocate for workforce development transfer for current officers so the funding can be used to obtain more mental health services in the jails.
Comments Received Via Voicemail		
March	Tina Civic	This Rule does not end solitary, it makes it worse in some regards. The Rule provides no time limits on emergency lock ins nor access to counsel. The Board should amend the Rule to reflect the Blueprint for ending solitary developed by JAC and HALT Solitary Campaign.
March	Pooja Goel	This Rule does not end solitary but simply renames it. The Rule provides no time limits on emergency lock ins nor access to counsel. Urged the Board amend the Rule to reflect the Blueprint for ending solitary confinement developed by JAC and HALT Solitary Campaign.
March	Daniella Provolone	This Rule does not end solitary. The Rule provides no time limits on emergency lock ins nor access to counsel. Urged the Board amend the Rule to reflect the Blueprint for ending solitary developed by JAC and HALT Solitary Campaign.
March	Oliver Davis	This Rule does not end torture or suffering and there needs to be a stronger rule to treat people humanely.
April	Scott Langley	The Board should revise the proposed Rule, it is solitary by another name. The legislature and Governor voted to end solitary confinement and the Board should follow.
April	Eileen Jarrett	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without any programming. This is solitary confinement by another name.
April	Meghan Maguire	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without any meaningful programming. This is solitary by another name.

Date	Name	Summary of Testimony
April	Adiela Naranjo	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without any meaningful programming. This is solitary by another name.
April	Anonymous	The proposed Rule creates a new form of solitary confinement, with a slightly larger cage. People need human interaction.
April	Anonymous	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without any meaningful human engagement or programming. This is solitary by another name.
April	Emma Arcos	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without any meaningful human engagement or programming. This is solitary by another name.
April	Malik Walker	Officer would like to know what punishment people will receive in RMAS when they assault, slash, or permanently maim officers.
April	Hannah Thorson	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without any meaningful human engagement or programming. This is solitary by another name.
April	Margret Seely	The proposed Rule creates an alternative that is equally damaging to people as solitary. Individuals and society will only become safer through meaningful human contact and programs that help people change and integrate into socially constructive behavior.
April	Malaika Small	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without any meaningful human engagement or programming. This is solitary by another name.
April	Brooke Taylor	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people. This is solitary by another name.
April	Caro McLoughlin	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people. This is solitary by another name.
April	Miranda Jackel	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people. This is solitary by another name.
April	James Worsdale	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people. This is solitary by another name.
April	Nidia Leaf	The Board should revise the proposed Rule to end solitary confinement once and for all. The proposal puts people into slightly larger cells for a few hours per day – it's only slightly less torture. It creates a lack of human engagement. It exacerbates mental health issues.
April	Elizabeth Weiss	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people. This is solitary by another name.
April	Erica Itzkowitz	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people. This is solitary by another name.
April	Rebecca Schectman	The Board should revise the proposed Rule pursuant to JAC/HALT Solitary's Blueprint and the NY HALT Solitary bill. RMAS Levels 1 and 2 create an extremely restrictive environment and RMAS denies programming. This is solitary by another name.
April	Jill Godmillow	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people. This is solitary by another name.
April	Anonymous	The Board should revise the proposed Rule to end all forms of solitary confinement. Isolating people for 24 hours per day is torture.
April	Chase	Officers' lives are in danger and threatened and something needs to be done.
April	Ulacia Jeanne	Officer said people in custody deserve the minimum standards, but when people become assaultive, there must be consequences. Only the most assaultive people are placed into solitary. Psychiatrists are afraid to enter housing units because of assaultive people.

Date	Name	Summary of Testimony
		Assaults on staff have risen in recent years and continue to get worse because there are far less repercussions for people in custody. The Board is taking away solitary confinement, the last tool DOC has to maintain some level of order in the jails.
April	Anonymous	Officer concerned with Section 6-05 of the proposed Rule and said there are no other areas to place people other than Intakes, because other locations are service areas or housing areas. Section 6-07(b) states RMAS Level 1 is only for violent offenses, but Grade 1 offenses should include spitting on civilian staff and officers, because this causes serious psychological injury. Grade 1 offenses should also include possession of weapons and exposing oneself to officers/civilian staff. The Rule should clearly define what constitutes a "serious injury" in Grade 1 offenses, and it should include abrasions and sprained/dislocated fingers (which DOC does not currently classify as "serious injury").
April	Adaam Glenn	Officer said RMAS provides zero consequences (there are hardly any consequences for people who attack staff/other people in custody now). The proposed Rule will make the jails more dangerous, and staff already continuously call out sick to avoid working because they fear for their safety. To reduce violence, the Board should add more time to people's sentences consecutively, instead of concurrently.
April	Steve Pomie	Person currently in custody discussed his experience in solitary. A disciplinary approach does not deter behavior, but instead creates idle time and the belief that people can withstand whatever they're put through. DOC's disciplinary approach hasn't worked and there must be a rehabilitative approach with meaningful programming, especially for youth. Young people (often without support at home) do not know better and should not be met with punishment. Mixing adults and young people allows older people to mentor and encourage youth. He discussed a program he participated in created by Warden Caputo at RNDC that reduced violence and UOFs and improved communication and mutual respect. The program involved participation from influential officers and influential people in custody.
April	Anonymous	Officer said replacing restrictive housing with RMAS is not a good idea and cell doors in the jails are easily manipulated and people easily open their doors to get out of their cells.
April	Jane	The proposed Rule continues isolation and people need meaningful programming and support. Corrections should rehabilitate people, not make them worse.
April	Rebecca	The proposed Rule creates extreme forms of isolation, indefinitely. People need at least 14 hours out-of-cell each day to participate in programming with other people. People should also have access to counsel.
April	Kathleen McKenna	The Board should revise the proposed Rule. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people. This is solitary by another name.
April	Peter Dipaloo	The proposed Rule is solitary by another name. It is torture and people will be separated in cages.
April	E. Huntington	The Board should revise the proposed Rule because it is solitary confinement and torture by another name.
April	Barry Nobel	The Board should revise the proposed Rule because it is solitary confinement by another name. Locking people up for 23-24 hours per day in cages is torture.
April	Rebecca Radieau	The Board should revise the proposed Rule because it is solitary by another name.
April	Julie Fissinger	The Board should revise the proposed Rule because it is solitary by another name. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people.
April	John Mackelroy	Discussed loved one's experience in solitary upstate and said the Board should revise the proposed Rule to truly end solitary confinement.
April	Kathryn Erbe	The Board should revise the proposed Rule because it is solitary by another name. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people.
April	Sarah Smith	The Board should revise the proposed Rule because it is solitary by another name. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people.

Date	Name	Summary of Testimony
April	Leanna Dessauer	The Board should revise the proposed Rule because it locks people alone for 24 hours per day – it does not end solitary confinement.
April	Donna Robin Whitman	The Board should revise the proposed Rule to actually end solitary confinement. Putting people into solitary makes things worse, and it's punitive and harmful.
April	Veronica Seeger	The Board should revise the proposed Rule because it is solitary confinement by another name. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people.
April	Benjamin Cajarty	The Board should revise the proposed Rule because it is solitary confinement by another name. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people.
April	Sara Kanter	The Board should revise the proposed Rule because it is solitary confinement by another name. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people.
April	Oliver Davis	The Board should revise the proposed Rule because it is solitary confinement by another name. The Rule should address the epidemic of retaliation in the jails, where people are retaliated against/put into solitary for talking back or filing complaints.
April	Pamela Grace	The Board should revise the proposed Rule because it is solitary by another name.
April	Chris Brant	The Board should revise the proposed Rule to end solitary confinement completely.
April	Anonymous	The Board should revise the proposed Rule because it is solitary confinement by another name. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people.
April	Virginia Ravenscroft	The Board should revise the proposed Rule because it is solitary confinement by another name. It locks people up alone for 24 hours per day, indefinitely, without meaningful human engagement or programming with other people. People need therapeutic programming.
April	Hannah Thorson	The Board should revise the proposed Rule because it is solitary confinement by another name. It locks people up alone in a cage for 24 hours per day, indefinitely, without meaningful human engagement or programming.
April	David Kane	The Board should revise the proposed Rule to come up with alternatives ways to actually end solitary confinement.
April	Wendy Bacolowitz	The Board should revise the proposed Rule because it is solitary confinement by another name. It locks people up alone in a cage for 24 hours per day, indefinitely, without meaningful human engagement or programming.