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The proposed revisions to the Minimum Standards related to Visiting, Packages, and Punitive Segregation would see New York City jails move in the wrong direction and should be rejected: I. Visiting: The DOC has put forth no evidence that the proposed changes would reduce violence or the proliferation of contraband. Additionally, the Department has not offered a reason why it needs to insert itself into the appeals process when visitation is denied. While increasing violence at Rikers is concerning, the people incarcerated in our jails need more support from their loved ones during such difficult periods, not less. Studies have shown that isolating people from their communities harms reintegration efforts and increases recidivism. Instead of making it harder for people to maintain relationships while they are incarcerated, the Board should be moving to make things easier. The Department should perhaps instead focus on making sure existing protocols for screening and searching visitors are followed properly. II. Packages: A significant number of people are incarcerated in the city's jails because they and their families cannot afford the bail that would have allowed them to await trial from their homes. Requiring family members to purchase new items and pay for shipping rather than allowing them to send or bring pre-owned items would be prohibitively expensive for many of these people. While it is true that DOC provides uniforms, inmates still need things like underwear and socks, and many of them rely on outside items to stay warm in the winter. The existence of monetary bail is already highly discriminatory against lower-income people; it is unfair for DOC to compound this unfairness through this proposed rule change, especially when it has put forth no evidence that violence is due to contraband coming in from packages or that the current protocols for screening packages are insufficient. III. Punitive Segregation: The Board adopted the thirty day limit on punitive segregation because it has been clearly demonstrated that placing people in solitary confinement for extended periods of time does nothing to reduce violence and causes severe harm to the well-being of people placed in isolation that multiple human rights bodies or organizations have stated in no uncertain terms amounts to torture. DOC's attempt to undue these changes are completely unwarranted and would mark a move in the wrong direction. The United Nations has stated that solitary confinement in excess of 15 days should be prohibited. The Board should be moving the city's jails in line with these international human rights norms by further limiting the use of punitive segregation to 15 days, not increasing the time permitted to 60 days as is proposed here.

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