

## Stein, Bennett (BOC)

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**From:** Herbert Morales <hmorales@correctionalassociation.org>  
**Sent:** Tuesday, January 28, 2020 12:45 PM  
**To:** BOC (BOC)  
**Subject:** Comment on Proposed Rule for Restrictive Housing in Correctional Facilities

To whom it may concern,

My comment is in regards to proposed rule Section 6-06(g), where a visual and aural observation for individuals placed in de-escalation confinement will be conducted every 30 minutes. I believe that instead of every 30 minutes, a visual and aural observation should be conducted every 15 minutes. The reason for my proposed adjustment is that people in de-escalation environments may suffer from suicidal ideations, especially if they have been victimized and/or have been victimized on previous occasions. Waiting every 30 minutes to conduct a visual and aural observation for someone placed in de-escalation is too risky and allows an ample amount of time for that person to successfully carry out any suicide attempts. Thus, I strongly recommend that visual and aural observations by staff be conducted every 15 minutes for those individuals placed in de-escalation confinement.

Thank you.

Herbert Morales  
1844 Fellow  
(he/him/his)  
Correctional Association of New York



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