PRISON POLICY INITIATIVE
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Comments of

the Prison Policy Initiative

OPPOSING CHANGES TO 103 CMR 483 (Visiting Procedure)

September 28, 2016

The Prison Policy Initiative is a nationally-focused non-profit based in Easthampton, Massachusetts that is deeply concerned about the proposed revisions to 103 CMR 483 (Visiting Procedure). We have published several reports regarding the importance of in-person communication between incarcerated people and their loved ones, including our 2015 report *Separation by Bars and Miles: Visitation in State Prisons*.

The proposed changes to the current visiting procedure are especially troubling.

483.01 Visiting Procedure – The proposed new visiting procedure would require people who are incarcerated to pick and choose which of their loved ones can visit them in prison. A pre-approved list of five, eight or ten visitors would be submitted to correctional authorities as part of a system that would greatly restrict incarcerated people's ability to stay connected to their communities.

The DOC already has in place adequate provisions that regulate visitation. The DOC already has the authority to not allow specific visitors due to their behavior while visiting a facility or due to their criminal record. Furthermore, the DOC can already limit the number of people who may visit an incarcerated person at one time. The proposed new visiting procedure creates another unnecessary barrier between people who are incarcerated and the outside world. This visiting procedure allows for the pre-approved list to be changed, but would require incarcerated people to again have their list approved.

The specifics of this proposal reveal its punitive intent. The amendment would limit the number of adults who can visit each incarcerated person (5 for those in maximum security, 8 for medium, and 10 for minimum). By linking the length of visitors' lists to the security level of incarcerated

people this policy is clearly meant as punishment. And it would punish far more than the people in your custody: it would punish the families, friends, and communities of people who are incarcerated.

Artificially capping the number of people who may visit at 5, 8 or 10 people is arbitrary and cruel. Most people have more immediate family members than that, and all would have more friends, mentors, distant relatives and supporters, all of whom should be encouraged to stay in the lives of an incarcerated person to the degree possible. The proposed amendment would disrupt positive relationships incarcerated people have with the outside world and limit the ability of friends, families, and communities to remain connected to people behind bars. Our research has confirmed what is widely assumed: maintaining healthy relationships while behind bars is critical to successful reentry. The proposed policy would only make the maintenance of human relationships even harder.

In our national report on visitation in state prisons, we specifically addressed Massachusetts' unnecessary and dehumanizing use of strip and dog searches on people visiting their incarcerated loved ones. Visitations are already difficult and trying experiences. The proposed amendment to visiting procedures would be an unnecessary additional impediment to the continued connection between incarcerated people and their friends, families, and communities.

This amendment would introduce a new and arduous process for incarcerated people and their loved ones. The DOC already has the ability to effectively manage who can and cannot visit their facilities. Forcing incarcerated people to choose which members of their families and which of their friends can visit with them isn't just unnecessary. It's wrong. We ask that the DOC recognize the unwarranted hardships introduced by the proposed change to visiting procedures and not pursue this amendment.

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