**Bedford Hills Correctional Facility**
**Humane Alternatives to Long-Term Solitary Confinement (HALT) Act**
**Final Compliance and Quality of Care Review**
**JC#: 77010177872**

On August 14, 2025, the Justice Center for the Protection of People with Special Needs (the Justice Center) conducted a site visit at the Bedford Hills Correctional Facility (CF) to review the programs, treatment, and conditions of confinement for incarcerated individuals placed in segregated confinement in that facility. The Justice Center also assessed compliance with the Humane Alternatives to Long-Term Solitary Confinement (HALT) Act.[1]

The Justice Center reviewed policies and practices concerning:

a. Placement of persons in segregated confinement and residential rehabilitation units (RRU).
b. Placement and treatment of persons meeting the "special population" definition in the HALT Act.[2]
c. Length of time spent in segregated confinement or residential rehabilitation units.
d. Hearings and procedures.
e. Assessments and rehabilitation plans, procedures, and discharge determinations.

The Justice Center toured the Special Housing Unit (SHU), Residential Rehabilitation Unit (RRU), and Therapeutic Behavioral Unit (TBU) and spoke with 17 incarcerated individuals.[3] In addition to reviewing clinical case records, and guidance records, the Movement Logs and Programming Logs, the Justice Center also requested any Exceptional Circumstances documentation for a time-period of six months.[4] There were two incarcerated individuals placed on exceptional circumstances during the review period according to documentation received by the Justice Center.[5]

To complete a thorough evaluation, Justice Center staff offered private interviews to 17 incarcerated individuals and nine individuals accepted. The interviews were conducted

[1] Correction Law §§137(6)(d)(e) (h), (i), (j), (k), (l), (m), (n), and (o) and §§138 (7), 401-a.
[2] Section 2 of the Correction Law, subdivision 33 defines Special Population as any person twenty-one years of age or younger; fifty-five years or older; with a disability; pregnant, in the first 8 weeks of post-partum recovery or caring for a child in a correctional facility.
[3] The census of the SHU was zero incarcerated individuals, the census of the RRU was 15 incarcerated individuals, and the census of the TBU was three incarcerated individuals. One incarcerated individual in the RRU was in observation in the RCTP at the time of the Justice Center's site visit, and was not seen, but is included in the Justice Center's sample.
[4] Review period: February 14, 2025, to August 14, 2025.
[5] Incarcerated Individual [redacted] (DIN #[redacted]) was placed on Exceptional Circumstances on two separate occasions, including July 13, 2025, and August 7, 2025, in addition to a second incarcerated individual during the review period.

in a private room at the Bedford Hills CF. The Justice Center also distributed 15 surveys to solicit information about programming, recreation, and tablet use in segregated confinement and two surveys were returned at the time of this report.[6] The Justice Center's findings, recommendations, and requests follow below.

**Justice Center Findings:**

Treatment and Conditions:

1. **The Bedford Hills CF was in the process of completing renovations in the SHU at the time of the Justice Center's site visit.**

   While touring the Bedford Hills CF SHU, Justice Center staff were able to observe an ongoing window construction project. Facility staff reported that they have not housed incarcerated individuals in the SHU for several months due to the project and typically move people directly into the RRU and TBU following any disciplinary actions.

   **Request:**

   Please provide the Justice Center with an estimated completion date for construction in the SHU building, and whether there are plans for construction in the RRU or TBU.

2. **There were no incarcerated individuals housed in the SHU at the time of the Justice Center's site visit.**

   Although the SHU is not housing any individuals, the Justice Center was provided a tour of the area and witnessed the renovations being completed. The SHU consists of twelve housing cells. The SHU building has a newer addition with classroom programming areas previously used when RRU was housed in the same building. The recreation area consists of two outdoor congregate recreation pens that include a picnic table and basketball hoop. Per staff report, programming in the SHU is offered in the morning for two hours, and recreation is offered for two hours in the afternoon. According to the SHU Orientation Manual programming states, "All incarcerated individuals will be offered 4 hours out of cell, consisting of 3 hours of daily out-of-cell congregate programming, services, treatment, recreation, activities and/or meals, with an additional one hour for recreation in a congregate setting in accordance with the SHU Daily Routine." The manual also details that programming is scheduled from 8:00 a.m. until 11:00 a.m. and outdoor recreation is offered between 1:30 p.m. and 2:30 p.m.

[6] Two individuals in the TBU were offered surveys and refused to accept them.

**Request and Recommendation:**

When housing incarcerated individuals in the SHU at the Bedford Hill CF resumes, the Justice Center recommends that a review of the SHU daily schedule be completed to ensure accuracy within the manual and times match across manuals and schedules provided to both incarcerated individuals and facility staff. Additionally, the Justice Center requests that the schedule for tablet usage be added to the manual.

If SHU housing has resumed, please provide the SHU program schedule and attendance records for the month of December 2025.

3. **Twelve incarcerated individuals were observed participating in out-of-cell programming in the RRU.**

The Bedford Hills CF RRU is located on the A Gallery and consists of a linear row of 16 housing cells, with two program classrooms on the unit. The incarcerated individuals on the unit are assigned to Group A or Group B and attend programming in an assigned classroom with the individuals in their assigned group. Group A was in a classroom with eight Reduced Security Therapy and Recreation Tables (ReSTART) chairs, while Group B was in the classroom adjacent with nine ReSTART chairs. All incarcerated individuals participating in programming at that time were observed to be unrestrained.

Programming in the RRU is scheduled to take place from 8:30 a.m. to 11:30 a.m. Per the RRU Incarcerated Individual Orientation Manual, " All incarcerated individuals will be offered seven hours out of cell, consisting of six hours of daily out-of-cell congregate programming, services, treatment, recreation, activities and/or meals, with an additional one hour for recreation in a congregate setting in accordance with the RRU Daily Routine." Programming offered in the RRU includes movies, and coloring, as reported by the incarcerated individuals. Justice Center staff observed incarcerated individuals requesting colored pencils, and coloring on preprinted coloring pages when speaking with incarcerated individuals in the classroom setting. Recreation is conducted similarly to programming with Groups A and B. Outdoor recreation is scheduled for 1:30 p.m. to 2:30 p.m. Outdoor recreation takes place in five congregate recreation pens, with three incarcerated individuals to a pen, per individual reports. The pens contain a picnic table and basketball hoop in each. As per staff reports, one recreation pen is held as an individual pen for those individuals who may be on exceptional circumstances. Indoor recreation occurs at 3:30 p.m. to 5:30 p.m. and 6:00 p.m. to 7:00 p.m. Tablets are offered to the incarcerated individuals on the unit from 5:00 p.m. to 10:00 p.m.

The Justice Center was provided copies of the July and August 2025 program "Write to Heal" schedule which outlines 9:00 a.m. to 12:00 p.m. programming Monday through Friday. Wednesdays were designated for "Write to Heal." Fridays were designated for "MOVIE DAY," and all remaining days were assigned by ORC or instructor.

At the Justice Center request, the Bedford Hills CF provided program attendance in the RRU program for the month of December 2025. The average attendance for daily out of cell programming in the RRU was 17 incarcerated individuals. Attendance peaked on December 31, 2025, with 21 participants, and the lowest rate of attendance occurred on December 19, 2025, and December 30, 2025, with 13 participants. Out-of-cell programming was offered on 21 days throughout the month and had some level of participation each day.[7]

**Request and Recommendation:**

The RRU program schedule boldly indicates it is the "Write to Heal" schedule, which is also only designated to take place on Wednesday each week. Please provide the Justice Center with an explanation of what programs are being offered during ORC scheduled blocks, and what skills or long-term goals the "Write to Heal" program aims to develop. Further, please provide whether the schedule, as printed, is made available to incarcerated individuals. If so, the Justice Center encourages Bedford Hills CF staff to include the type or name of the program being offered to entice and incentivize attendance.

4. **There were no incarcerated individuals participating in out-of-cell programming in the TBU.**

The Bedford Hills CF TBU consists of a linear row of 16 housing cells and three program classrooms on the unit. One classroom contained five ReSTART chairs, the second contained eight ReSTART chairs, and the third contained 10 ReSTART chairs. The TBU is structured in phases, in which incarcerated individuals can earn additional privileges by working through phases I, II, and III. Although staff reported that out-of-cell programming in the TBU is offered from 8:30 a.m. to 11:30 a.m., the TBU Incarcerated Individual Patient Handbook Daily Weekday Schedule and TBU Group schedule provided to the Justice Center outlines that out of cell programming occurs from 9:00 a.m. to 11:00 a.m. Morning programming includes Spirituality, Mindfulness, Coping Skills, Crisis Intervention, Art and History, and Debate and Relate. Afternoon programming is also offered from 12:30 p.m. to 2:30 p.m. on weekdays and weekends. The afternoon out of cell activities consists of an earned movie, Dual Diagnosis Treatment (DDT), socialization, Anger Replacement Therapy (ART), journaling, and communication.

Outdoor recreation is scheduled to take place in the TBU from 4:00 p.m. to 5:00 p.m. during the week and 9:00 a.m. to 11:00 a.m. on weekends. Individuals also have the opportunity to participate in indoor recreation on the block from 6:00 p.m. to 8:00 p.m. Tablets are provided in cell from 8:00 p.m. to 10:00 p.m. At the entrance interview, facility staff informed Justice Center staff that OMH conducts 60% of programming in the TBU, while DOCCS offers 40% of programming.

[7] Out of cell programming was offered on 21 out of 31 days in the month of December 2025, absent weekends and holidays. It is unclear why programming was not offered on Tuesday, December 16, 2025.

At the Justice Center request, Bedford Hills CF provided program attendance in the TBU program for the month of December 2025. The average daily out of cell programming in the TBU for the month of December 2025 is approximately six incarcerated individuals. Attendance peaked on December 22, 2025, with nine participants, and the lowest rate of attendance occurred on December 1, 2025, with no participants. Out of cell programming was offered on 21 of the 31 days in December 2025.[8]

**Recommendation:**

The Justice Center recommends that OMH and security staff at the Bedford Hills CF TBU encourage program attendance to give individuals the opportunity to openly discuss frustrations, identify triggers, and learn healthy coping mechanisms in a safe environment.

5. **Two incarcerated individuals reported that violent movies and coloring are often integrated into programming.**

During private interviews, one individual reported that the incarcerated individuals in their assigned group often discuss going back into general population with plans to re-engage in the same harmful behaviors that resulted in their placement in the RRU, and that they often choose violent movies to watch, which the individual stated they found contradictory to the therapeutic and rehabilitative environment. The second individual reported that programming consists of coloring and watching movies "like we are 5-year-olds."

**Request and Recommendation:**

Given the nature of the individual's disciplinary sanctions during the time of the Justice Center's review, such as engaging in violent conduct, assault on staff, and arson, and the report of the viewing of violent movies, please provide the protocol for how movies are chosen and whether there is a library of DOCCS approved movies for viewing. If a protocol does not exist, the Justice Center recommends one be created to only utilize approved movies in the therapeutic environment of an RRU.

In addition, the Justice Center further encourages the use of therapeutic materials and group programming activities in the RRU setting that focus on positive behavior development and therapeutic rehabilitation.

6. **Approximately 66% of the informational reports received by the Justice Center were for negative behavior.**

The Justice Center received a total of 53 informational reports with 35 being negative and 18 being positive.

[8] Out of cell programming is offered on 21 of 31 days in December 2025, absent weekends and holidays. It is unclear why out of cell programming was not offered on Tuesday, December 16, 2025.

In reviewing the informational reports and Program Management Team (PMT) meeting minutes, the Justice Center determined that the PMT conducted weekly reviews for the individual's housed in the RRU, utilizing the informational reports completed. As a result of the reviews, incarcerated individuals progress in programming, and overall behavior were taken into consideration for recommended time cuts. The PMT recommended time cuts in allotments from one-day to 75-days. The average length of a time cut granted during the review period was approximately 14 days. Positive informational reports were given for things such as an incarcerated individual providing positive feedback and constructive criticism to a peer, providing thoughtful feedback, and exhibiting self-management skills. Negative informational reports were given for failing to remove coverings blocking view into a cell, individual's refusing to remain seated during programming, and yelling or shouting on the unit.

**Recommendation:**

The Justice Center commends the Bedford Hills CF staff for conducting weekly reviews and discussing informational reports completed for the individual's housed in the RRU. The Justice Center also acknowledges the use of the information reports for granting time cuts and recommends increasing time cuts to boost participation in programming, incentive positive behavior and rule adherence.

7. **The Justice Center received two surveys out of the fifteen that were distributed to incarcerated individuals at the time of the site visit.**

According to the survey responses received, the individuals reported being offered programming four to five times per week. They were unaware of the names of the programs except "rec" and "a right to heal". The most common reasons given to individuals about why program was canceled include lack of staff and a female staff being available. One individual found programming to be helpful while the other did not. They reported that they would rather have a women's group and to be able to play games. The two individuals reported on the survey that they are offered and accept recreation daily. Recreation is congregate and occurs in both the morning and the afternoon.

Justice Center staff conducted private interviews with nine incarcerated individuals. The incarcerated individuals reported mixed reviews in finding programming helpful, with many reporting that the programming available is often redundant, or includes tasks such as coloring, crossword puzzles, or work packets. During the private interviews none of the individuals were able to describe incentives available on the unit. One individual reported being told by staff that incentives are not offered on the unit. One individual reported that positive informational reports were considered the incentive. According to the RRU Operations Manual, incentives can be earned through positive progress and participation. Per the records received by the Justice Center, it is unclear if any individuals in the RRU have received any incentives.

Per the Justice Center's request, DOCCS provided the Residential Rehabilitation Units- Incentive Options form which allows incarcerated individuals with the option to make three choices for incentives and the final determination is made by the Program Management Team after reviewing the informational report and the individual's overall progress. Such incentives include an increase in their commissary buy, extra books or magazines, word puzzles and "brain teasers packet," journal, additional DOCCS issued hygiene products, an extra haircut, extra cell-cleanup, an extra shower, a feature film, or a package if that individual is serving a loss of packages sanction.

**Request and Recommendations:**

The Justice Center requests an explanation about how incentives are documented when awarded in the RRU and what incentives are readily available. Knowledge of the incentives available can serve to incentivize positive behavior to earn known incentives, improving the overall daily functioning of the unit.

Special Populations:

8. **At the time of the Justice Center's site visit, there was not anyone under the age of 21, over the age of 55, pregnant or with any disability in the SHU.**

9. **Two individuals were placed in a "Special Population Diversion" unit upon their transfer to the Bedford Hills CF.**

   According to the documentation provided, incarcerated individual 1, a MHSL 3, and incarcerated individual 2, a MHSL 6, transferred from the Albion CF to the Bedford Hills CF on August 5, 2025. [9] [10] Both individuals received an intake SHU/RRU/Special Population Diversion Mental Health interview on August 6, 2025. The interviews both indicate that the individuals were housed in "Special Population Diversion". The following day, August 7, 2025, the two received an additional intake assessment, noting they were both in the RRU.

   **Request:**

   The Justice Center requests clarification as to where the two individuals were housed on August 6, 2025, at the time of their mental health interviews. If in fact Bedford Hills CF has a Special Population/Diversion Unit, please provide its bed capacity.

Hearings and procedures:

10. **Upon review of Tier Hearing materials for all 20 individuals in the sample at Bedford Hills, it was determined they were appropriate for criteria justifying**

[9] [redacted] (DIN # [redacted]) is hereinafter referred to as incarcerated individual 1.
[10] [redacted] (DIN # [redacted]) is hereinafter referred to as incarcerated individual 2.

**Tier III confinement and had engaged in behaviors that warranted placement, including violent conduct, assault on staff, and fighting.**

11. **According to the documentation provided to the Justice Center, 14 DOCCS staff were up to date on the Tier III Hearing Officer Training.**[11]

In reviewing the tier hearing training, as of September 3, 2025, 10 civilian staff, one correction officer, and three supervisors were up to date on the Tier III Hearing Officer training. This is a notable decline in the number of up-to-date hearing officers from the Justice Center's May 2024 review of the Bedford Hills CF, during which there were 25 staff up to date on the Tier III Hearing Officer training.[12]

At the Justice Center's request, DOCCS provided the Justice Center with an updated list of staff who are up to date on their Tier III Hearing Officer training. As of January 15, 2026, there are 21 staff up to date on the training.

12. **Hearing Extension Requests were submitted for approximately 38 Tier 2 disciplinary hearings between March and August 2025.**

Following the review of disciplinary packets of the 20 incarcerated individuals in the Justice Center's sample, Hearing Extension Requests were submitted on approximately 38 occasions due to a hearing officer being unavailable.

Several examples include:

- Incarcerated individual 3 received a Tier 2 ticket on March 11, 2025, while at Bedford Hills CF for violent conduct, fighting, and refusing direct order, after security staff observed the individual fighting with a peer, and failed to comply with orders given to stop.[13] A disciplinary hearing extension was requested on March 24, 2025, due to the individual requesting video and witnesses. The extension was granted to be completed by April 2, 2025; however, an additional extension was requested on April 2, 2025, due to a hearing officer being unavailable which was granted to be completed by April 9, 2025. A hearing was started on March 24, 2025, and completed on April 10, 2025.
- Incarcerated individual 4 received a Tier 2 ticket on March 31, 2025, while at Bedford Hills CF for fighting and refusing a direct order, after the individual had begun fighting with a peer, and refused to separate.[14] A hearing extension request was submitted on April 14, 2025, due to no hearing officer being available. The extension was granted to be completed by April 21, 2025. An additional extension was submitted on

[11] Per the DOCCS Tier III Hearing Officer Training Record.
[12] NYS Justice Center Final Report dated January 14, 2025.
[13] [redacted] (DIN # [redacted]) is hereinafter referred to as incarcerated individual 3.
[14] [redacted] (DIN # [redacted]) is hereinafter referred to as incarcerated individual 4.

April 21, 2025, due to no hearing officer being available and was granted to be completed by April 30, 2025. A hearing was started and completed on April 28, 2025.

- Incarcerated individual 5 received a Tier 2 ticket, on May 11, 2025, while at Bedford Hills CF for violent conduct, creating a disturbance, fighting and refusing a direct order after they approached a peer and began "exchanging closed fist punches."[15] A hearing extension request was submitted on May 27, 2025, due to a hearing officer being unavailable, which was granted for a hearing to be completed by June 4, 2025. However, another hearing extension request was made on June 4, 2025, requesting an extension to June 10, 2025, due to no hearing officer being available, which was granted to complete a hearing by June 10, 2025. Finally, another hearing extension request was made on June 10, 2025, however this was due to the individual being on a "Legal visit." This was granted to be completed by June 11, 2025. A hearing was started and completed on June 11, 2025.
- Incarcerated individual 6 received a Tier 2 ticket, on July 7, 2025, while at Bedford Hills CF for creating a disturbance, harassment, refusing direct order, and threats, after security staff observed the individual banging on the window of the recreation area.[16] They did not comply with orders from security staff to stop. They could be heard yelling loudly down the unit, calling staff, "stupid fat bitch" and threatening to spit on staff, and "other forms of physical violence" towards staff. A hearing extension request was submitted on July 21, 2025, due to a hearing officer being unavailable, which was granted for a hearing to be completed by July 30, 2025. Another extension was requested on July 30, 2025, due to no hearing officer being available, which was approved to be completed by August 7, 2025. A hearing was started on August 6, 2025, and completed on August 7, 2025.

**Requests:**

Please provide the Justice Center with the rationale behind the extensive number of Tier 2 hearing extension requests being submitted for disciplinary hearings taking place at the Bedford Hills CF, and how many Tier 2 hearing extension requests were completed due to a hearing officer being unavailable in December 2025.

[15] [redacted] (DIN # [redacted]) is hereinafter referred to as incarcerated individual 5.
[16] [redacted] (DIN # [redacted]) is hereinafter referred to as incarcerated individual 6.

Assessments and rehabilitation plans, procedures, and discharge determinations:

13. **52 Special Housing Unit/Residential Rehabilitation Unit/Special Population Mental Health Interviews completed in the Bedford Hills CF RRU had no useful information included under the recommendations section.**

The Justice Center reviewed 52 SHU/RRU/ Special Population Diversion Mental Health Interview assessments that were completed for 15 incarcerated individuals housed in the RRU.[17] All assessments included the following statement under the recommendation section: "This individual will continue to be seen on daily rounds and as per policy." All but three of the 15 incarcerated individuals in the Justice Center's RRU sample were on the mental health caseload.

**Recommendations:**

While Justice Center understands that it is OMH's stance that the SHU/RRU/Special Population Diversion Mental Health Interview form indicates that the recommendations section only need to be completed upon an individual being admitted to the mental health caseload, the Justice Center encourages OMH executive staff to conduct a review of the policy, adopting best practices similar to those of other facilities in utilizing the SHU/RRU/Special Population Diversion Mental Health Interview form similar to a progress note to document the content of the contact with an incarcerated individual.[18] The narrative included in the recommendations section should prioritize ongoing individual need development to better attain their goals, document concerns that staff or the individual may have expressed during the contact, observations made by staff, and useful information used to better engage the individual.

14. **Incarcerated individuals were not offered private interviews or could not attend their scheduled call outs due to "DOCCS staffing issues" and a "DOCCS Prison-Wide Staffing State of Emergency".**

According to their SHU/RRU/Special Population Diversion Mental Health Interview, 10 incarcerated individuals could not be offered a private interview due to "DOCCS staffing issues."[19] In addition, 5 incarcerated individuals were

[17] [redacted] (DIN # [redacted]) six assessments, [redacted] (DIN # [redacted]) three assessments, [redacted] (DIN # [redacted]) two assessments, [redacted] (DIN # [redacted]) three assessments, [redacted] (DIN # [redacted]) two assessments, [redacted] (DIN # [redacted]) seven assessments, [redacted] (DIN # [redacted]) seven assessments, [redacted] (DIN # [redacted]) three assessments, [redacted] (DIN # [redacted]) two assessments, [redacted] (DIN # [redacted]) four assessments, [redacted] (DIN # [redacted]) two assessments, [redacted] (DIN # [redacted]) two assessments, [redacted] (DIN # [redacted]) two assessments, [redacted] (DIN # [redacted]) two assessments, and [redacted] (DIN # [redacted]) five assessments.

[18] Off ice of Mental Health's December 16, 2024, response to the Justice Center's December 2, 2024, draft report following a May 16, 2024, site visit.

[19] SHU/RRU/Special Population Diversion Mental Health Interviews impacted by DOCCS staffing: [redacted] (DIN # [redacted]) July 23, 2025, [redacted] (DIN # [redacted]) July 22, 2025, [redacted] (DIN # [redacted]) July 22, 2025, [redacted] (DIN # [redacted]) August 7, 2025 – indicates that the

unable to attend their regular scheduled mental health callouts due to "DOCCS Prison-Wide Staffing State of Emergency."[20]

**Request:**

Please provide the Justice Center with an explanation of the efforts mental health staff made to meet the incarcerated individual's mental health needs during the "DOCCS Prison-Wide Staffing State of Emergency". Specifically, what additional services or assistance was offered to the individuals in the SHU and RRU at the Bedford Hills CF at the time the state of emergency was taking place?

15. **DOCCS staff alleged that incarcerated individual 5 had made threatening statements, but staff later reported the individual had not actually made any threats, rather, the unit sergeant did not want the individual discharged from the Residential Crisis Treatment Program (RCTP).**

Incarcerated individual 5 a MHSL 1, diagnosed with unspecified depressive disorder, was admitted to the RCTP on June 22, 2025, after setting a fire and being found unresponsive in their cell. They were cleared by medical staff for admission to observation following the incident and were given a Tier III ticket. Upon arriving to the RCTP, they reported that they had set the fire to seek attention, as they were experiencing difficulties with their sickle cell, and wanted to go to an outside hospital.[21]

On June 23, 2025, psychiatric staff met with the individual in the RCTP call out area. Security staff informed that the individual had attempted to set another fire in the observation room that morning, resulting in security staff placing the individual in the call out room. Security staff further reported that they had attempted to start the fire using a lighter, which security staff were attempting to confiscate but the individual was refusing to give it up and was hiding it in their vagina/private area. Psychiatric staff determined that the individual would continue their placement in the RCTP for continued monitoring, and psychiatric stabilization.[22] The individual is documented later in the day as having attempted to set two more fires and continued to refuse to hand the lighter over to staff.[23]

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individual refused a private interview but also documented that a private interview could not be offered, [redacted] (DIN # [redacted]) February 26, 2025, and July 1, 2025, [redacted] (DIN # [redacted]) March 11, 2025, [redacted] (DIN # [redacted]) July 22, 2025, [redacted] (DIN # [redacted]) August 7, 2025 – indicates that the individual refused a private interview but also documented that a private interview could not be offered, and [redacted] (DIN # [redacted]) March 11, 2025.

[20] [redacted] (DIN # [redacted]) February 21, 2025, and March 12, 2025, [redacted] (DIN # [redacted]) February 25, 2025, [redacted] (DIN # [redacted]) March 3, 2025, and March 12, 2025, [redacted] (DIN # [redacted]) February 20, 2025, and [redacted] (DIN # [redacted]) February 24, 2025.

[21] RCTP Nursing Progress Note dated June 22, 2025.

[22] Psychiatric Progress Note dated June 23, 2025.

[23] RCTP Nursing Progress Note dated June 23, 2025.

On June 24, 2025, the individual is documented as having difficulty managing their behavior in the RCTP, by failing to follow orders from security staff, resulting in a use of force. When they were seen by psychiatric staff, the individual was unable to be redirected from their stressor, with them reporting frustration over lost property.[24] Despite the individual requesting to return to the RRU, they remained on one-to-one watch, as they had attempted to set four fires the day prior, but did finally forfeit the lighter to security staff.[25] By June 25, 2026, the individual reflected on their recent behavior, and was able to discuss their regret in attempting to light the fires, and reflected on the things they could control.[26] One-to-one observation was discontinued, but the individual remained in the RCTP for observation.[27]
On June 26, 2025, prior to the individual meeting with the RCTP treatment team the following statement is documented: "It was reported by the sergeant that [they] were making threats about what [they] would do. After the session, officer reported that [they] had not made any threats today, the sergeant just did not want [them] discharged." Following a consultation by the treatment team, the individual was discharged back to the RRU.

**Requests and Recommendation:**

The Justice Center requests whether OMH staff addressed the above-described situation with DOCCS executive staff due to the false statements provided which may have perpetuated a longer RCTP admissions that wasn't clinically indicated.

In addition, the Justice Center recommends that the Bedford Hills DOCCS executive team conduct a review to identify the motive as to why the sergeant would provide false statements and if required, provide additional training. Please provide the Justice Center with an explanation pertaining to the follow up conducted, and any corrective action taken.

**16. Incarcerated individual 5 was seen by the provider and clinician on two separate dates, but the progress notes have identical narratives.**

Incarcerated individual 5, was admitted to the RCTP on July 10, 2025, for self-harm behavior after "tying something around [their] neck." Two RCTP Observation/Dorm Progress Note's dated August 5, 2025, and August 7, 2025, the psychiatric provider and clinician "attempted to meet with the patient." The narrative under *SESSION CONTENT* are identical on both progress notes. [28]A

[24] RCTP Observation/Dorm Progress Note dated June 24, 2025.
[25] RCTP Nursing Progress Note dated June 24, 2025.
[26] RCTP Observation/Dorm Progress Note dated June 25, 2025.
[27] RCTP Nursing Progress Note dated June 25, 2025.
[28] " [redacted] stated that she hurt herself yesterday and plans on hurting herself again today. Writer attempted to encourage her to maintain safety and try to engage in coping skills to not act on her impulses but patient state that is she is not going to be helped by going to central then she is going to either stay here for one year or end her life. Patient stated that she does not want to speak anymore and told team to get away from her cell."

clinical referral for consultation was submitted most recently on August 4, 2025, recommending continued RCTP placement.

**Recommendations:**

Given the purpose of the RCTP environment, and the rapidly changing needs of incarcerated patients, repetitive progress notes and inaccuracies in an individual's mental health treatment record can impact daily continuation of treatment. The Justice Center recommends that OMH staff at the Bedford Hills CF be retrained in the completion of progress notes, specifically those that fall within the processes of an RCTP.

In addition, please provide an update on incarcerated individual 5's MHSL, clinical diagnosis, current housing program, and whether they have had any RCTP admissions since August 14, 2025.

Review conducted by:
Stephanie Diamond, Facility Review Specialist

NEW YORK STATE | Office of Mental Health

**KATHY HOCHUL**
Governor

**ANN MARIE T. SULLIVAN, M.D.**
Commissioner

February 18, 2026

Jody Signoracci
Deputy Director of Outreach, Prevention and Support
Justice Center for the Protection of People with Special Needs
161 Delaware Avenue
Delmar, New York 12054

Dear Ms. Signoracci:

We received your letter dated 1/23/26, in response to the Justice Center's 8/14/25 site visit of the Bedford Hills Correctional Facility (CF) Special Housing Unit (SHU), Residential Rehabilitation Unit (RRU), and Therapeutic Behavioral Unit (TBU) to review the quality of mental health care provided to incarcerated individuals and determine compliance with the Humane Alternatives to Long-Term Solitary Confinement (HALT) legislation, the Office of Mental Health's (OMH) policies, and the Department of Corrections and Community Supervision's (DOCCS) directives.

OMH responses were not requested or required for the recommendations associated with Findings #1-3, 5-9, and 11-13. Below are OMH's responses to the pertinent findings.

**Request and Recommendation for Finding #4:**
"The Justice Center recommends that OMH and security staff at the Bedford Hills CF TBU encourage program attendance to give individuals the opportunity to openly discuss frustrations, identify triggers, and learn healthy coping mechanisms in a safe environment. Please also provide the current TBU program schedule and attendance records for the month of December 2025."

**OMH Response:**
OMH makes every effort to encourage incarcerated individuals to attend the programming that is offered to them. The December 2025 OMH TBU programming schedule and attendance record are enclosed with this response.

**Request for Finding #10:**
"The Justice Center requests clarification as to where the two individuals were housed on August 6, 2025, at the time of their mental health interviews. If in fact the Bedford Hills CF has a Special Population/Diversion Unit, please provide its bed capacity."

**OMH Response:**
The "Special Population Diversion" box was inadvertently checked on these progress notes. Both individuals resided in the RRU at the time of these callouts.

**Recommendation for Finding #14:**
"While Justice Center understands that it is OMH's stance that the SHU/RRU/Special Population Diversion Mental Health Interview form indicates that the recommendations section only need to be completed upon an individual being admitted to the mental health caseload, the Justice Center

encourages OMH executive staff to conduct a review of the policy, adopting best practices similar to those of other facilities in utilizing the SHU/RRU/Special Population Diversion Mental Health Interview form similar to a progress note to document the content of the contact with an incarcerated individual. The narrative included in the recommendations section should prioritize ongoing individual need development to better attain their goals, document concerns that staff or the individual may have expressed during the contact, observations made by staff, and useful information used to better engage the individual."

**OMH Response:**
All mental health individuals housed in the RRU receive Individual Rehabilitation Plans (IRPs), which address the individual's mental health treatment goals. These are then discussed at the joint Program Management Team (PMT) meeting with DOCCS to discuss OMH's observations, any concerns they may have about the incarcerated individual, and the progress the individual is making on their goals. If any immediate concerns arise during a mental health callout, these are documented on the pertinent progress note as indicated. It is inaccurate to posit that for these 15 individuals, there were concerns that arose during contacts that mental health staff omitted from the progress note.

**Request for Finding #15:**
"Please provide the Justice Center with an explanation of the efforts mental health staff made to meet the incarcerated individual's mental health needs during the 'DOCCS Prison-Wide Staffing State of Emergency'. Specifically, what additional services or assistance was offered to the individuals in the SHU and RRU at the Bedford Hills CF at the time the state of emergency was taking place?"

**OMH Response:**
OMH wants to make clear that the February and March callouts that could not be completed due to the "DOCCS Prison-Wide Staffing State of Emergency" occurred during the DOCCS job action strike, which did not end until 3/10/25. For the remainder of the callouts cited, despite the strike itself ending, the impact of DOCCS staffing shortages continues to affect OMH's ability to provide consistent private callouts. Despite this, OMH staff continue to conduct daily SHU and RRU rounds to assess the incarcerated individuals' functioning. If they are made aware of any immediate concerns, these are addressed as expediently as staff are able. Lastly, OMH facility staff are in continuous contact with CNYPC administration to communicate any barriers that endure due to DOCCS staffing shortages.

**Requests and Recommendation for Finding #16:**
"The Justice Center requests whether OMH staff addressed the above-described situation with DOCCS executive staff due to the false statements provided which may have perpetuated a longer RCTP [Residential Crisis Treatment Program] admissions that wasn't clinically indicated.

In addition, the Justice Center recommends that the Bedford Hills DOCCS executive team conduct a review to identify the motive as to why the sergeant would provide false statements and if required, provide additional training. Please provide the Justice Center with an explanation pertaining to the follow up conducted, and any corrective action taken."

**OMH Response:**
OMH staff cannot recall whether this was reported to DOCCS executive staff. It is important to note, however, that OMH staff do not continue RCTP admissions based solely on the reports of the admitting staff. The decision to keep someone in RCTP is made based on thorough clinical assessments and discussions amongst the treatment team. Regardless of the officer's comments,

OMH staff would have ended incarcerated individual 5's RCTP admission when clinically indicated. The remainder of this issue is deferred to DOCCS for comment.

**Recommendation for Finding #17:**
"Given the purpose of the RCTP environment, and the rapidly changing needs of incarcerated patients, repetitive progress notes and inaccuracies in an individual's mental health treatment record can impact daily continuation of treatment. The Justice Center recommends that OMH staff at the Bedford Hills CF be retrained in the completion of progress notes, specifically those that fall within the processes of an RCTP [admission].

In addition, please provide an update on incarcerated individual 5's MHSL [Mental Health Service Level], clinical diagnosis, current housing program, and whether they have had any RCTP admission since August 14, 2025."

**OMH Response:**
Staff regularly attend trainings that remind them of the importance of writing progress notes that capture the unique circumstances of each contact, regardless of housing unit.

Incarcerated individual 5 was made a MHSL 1S on 11/4/25 upon being diagnosed with Schizoaffective Disorder, Bipolar Type. At that time, she was diverted to the TBU where she continues to reside. She has required five RCTP admissions since 8/14/25, with her last admission ending on 11/24/25. These admissions were initiated due to her engaging in non-suicidal self-injury, and her requesting a respite in RCTP due to having difficulty adjusting to her new housing unit. She was able to work through these issues with staff and has been participating in TBU programming appropriately.

Sincerely,

Li-Wen Lee, M.D.
Associate Commissioner
Division of Forensic Services

cc: Danielle Dill, Psy.D., Executive Director, CNYPC
William Vertoske, Deputy Director, Corrections Based Operations, CNYPC
File

March 5, 2026

Jody Signoracci
Deputy Director, Office of Outreach, Prevention & Support
NYS Justice Center for the Protection of People with Special Needs
161 Delaware Avenue
Delmar, NY 12054

**Bedford Hills Correctional Facility**
**Humane Alternatives to Long-Term Solitary Confinement (HALT) Act**
**DRAFT Compliance and Quality of Care Review**
**JC#: 77010177872**

Dear Deputy Director Signoracci:

This is in response to the New York State Justice Center's visit to the Bedford Hills Correctional Facility on August 14, 2025, to review the quality of corrections-based mental health programs, treatment, and conditions of confinement for incarcerated individuals placed in Special Housing Unit (SHU), Residential Rehabilitation Unit (RRU), and Therapeutic Behavioral Unit (TBU) in accordance with the HALT Legislation, OMH policies, and DOCCS Directives.

**1. Request**

Please provide the Justice Center with an estimated completion date for construction in the SHU building, and whether there are plans for construction in the RRU or TBU.

**Response:**

The construction project to install new windows in the SHU was recently completed, however, after inspection by the Office of General Services (OGS) on February 20, 2026, there were some deficiencies noted. OGS has reached out to the contractor to get this addressed immediately; however, we do not have an estimated completion date. There are currently no plans for construction in the RRU or TBU.

**2. Request and Recommendation:**

When housing incarcerated individuals in the SHU at the Bedford Hill Correctional Facility resumes, the Justice Center recommends that a review of the SHU daily schedule be completed to ensure accuracy within the manual, and times match across manuals, and schedules provided to both incarcerated individuals and facility staff. Additionally, the Justice Center requests that the schedule for tablet usage be added to the manual.

If SHU housing has resumed, please provide the SHU program schedule and attendance records for the month of December 2025.

**Response:**

Our administration at Bedford Hills Correctional Facility has assigned staff to review and update the SHU manual to ensure that all documentation and programming information are matching. This update will include the program schedule, recreation times and tablet usage schedule.

There are no attendance records for the month of December 2025 as the SHU at Bedford Hills Correctional Facility was not operational and all incarcerated individuals were diverted to RRU.

**3. Request and Recommendation:**

The RRU program schedule boldly indicates it is the "Write to Heal" schedule, which is also only designated to take place on Wednesday each week. Please provide the Justice Center with an explanation of what programs are being offered during ORC scheduled blocks, and what skills or long-term goals the "Write to Heal" program aims to develop. Further, please provide whether the schedule, as printed, is made available to incarcerated individuals. If so, the Justice Center encourages Bedford Hills Correctional Facility staff to include the type or name of the program being offered to entice and incentivize attendance.

Please also provide the current RRU program schedule and attendance records for the month of December 2025.

**Response:**

The curriculum utilized in the Bedford Hills Correctional Facility SHU includes Cognitive Behavioral Therapy (CBT), Emotional Regulation, Wellness, Recreation, Communication, and a variety of topics which emphasize personal growth. These courses are facilitated by the ORC assigned and for each module they attend, incarcerated individuals are offered a CBT curriculum for the first part of the session followed by activities and exercises to assist them to achieve their goals and help promote their reintegration into general population. The topics are rotated as needed and will be included in the schedule as well as the manual that is provided to the incarcerated individuals in SHU.

The Right/Write to Heal project is a collaborative initiative with the Columbia University Center for Justice. The goal of the program is to empower individuals in correctional settings to express themselves through writing by telling their own stories. The goal of this program is to humanize the individual and collective experiences incarcerated individuals have faced and the barriers and challenges that led to their imprisonment.

Please see attached the RRU program schedule and attendance records for the month of December 2025.

**4. Request and Recommendation:**

The Justice Center recommends that OMH and security staff at the Bedford Hills Correctional Facility TBU encourage program attendance to give individuals the opportunity to openly discuss frustrations, identify triggers, and learn healthy coping mechanisms in a safe environment. Please also provide the current TBU program schedule and attendance records for the month of December 2025.

**Response:**

At Bedford Hills Correctional Facility, our administration continues to emphasize the benefits of rehabilitative and therapeutic programming in SHU to all staff through trainings and various meetings. Incarcerated individuals in SHU are encouraged by ORC and security staff during Go-Rounds to participate daily in out-of-cell programming and work on identifying the behaviors that led to their disciplinary confinement and take necessary steps to engage in behavior modification. OMH is not involved in programming in SHU.

Please see attached the TBU program schedule and attendance records for the month of December 2025.

**5. Request and Recommendation:**

Given the nature of the individual's disciplinary sanctions during the time of the Justice Center's review, such as engaging in violent conduct, assault on staff, and arson, and the report of the viewing of violent movies, please provide the protocol for how movies are chosen and whether there is a library of DOCCS approved movies for viewing. If a protocol does not exist, the Justice Center recommends one be created to only utilize approved movies in the therapeutic environment of an RRU.

In addition, the Justice Center further encourages the use of therapeutic materials and group programming activities in the RRU setting that focus on positive behavior development and therapeutic rehabilitation.

**Response:**

Incarcerated individuals who are programming in RRU are afforded privileges and incentives that are comparable to other individuals in general population. The movie selection utilized in RRU includes educational and non-educational material that are available in the library for all incarcerated individuals. Due to the therapeutic nature of the RRU program, we continue to encourage our staff to use their judgement when selecting movie incentives that are supportive and geared towards positive behavior changes.

All materials and group programming activities in the RRU are therapeutic in nature and pre-approved at the central office level with a focus on positive behavior development and therapeutic rehabilitation. This is also monitored at the facility level by the Deputy Superintendent for Program Services and their assigned staff.

**6. Recommendation:**

The Justice Center commends the Bedford Hills Correctional Facility staff for conducting weekly reviews and discussing informational reports completed for the individual's housed in the RRU. The Justice Center also acknowledges the use of the information reports for granting time cuts and recommends increasing time cuts to boost participation in programming, incentive positive behavior and rule adherence.

**Response:**

The staff at Beford Hills Correctional Facility take great pride in providing a therapeutic environment for incarcerated individuals programming in RRU. The Program Management Team (PMT) conducts meaningful reviews of incarcerated individuals to assess their progress. Positive behaviors are reinforced using positive informational reports, incentives, and positive reinforcement of socially appropriate behaviors.

Disciplinary time cut recommendations are made at the discretion of the PMT based on the behavior and progress of the individual with the Superintendent giving final approval.

**7. Request and Recommendations:**

The Justice Center requests an explanation about how incentives are documented when awarded in the RRU and what incentives are readily available. Furthermore, please supply the current list of incentives that were available and shared with individuals in January 2026. Knowledge of the incentives available can serve to incentivize positive behavior to earn known incentives, improving the overall daily functioning of the unit.

**Response:**

When an incarcerated individual earns an incentive, the assigned ORC presents them with an incentive sheet (see attached) with the option to make 3 choices. The PMT makes the final decision after reviewing the informational report and overall progress during the weekly meeting. All earned incentives are documented in a logbook on the unit and the incentive sheet is placed in the incarcerated individual's folder.

**8. Request:**

Please provide the Justice Center with the above listed documentation for review. (Logbooks for the SHU, RRU, and TBU for a two-week period of July 30, 2025, to August 13, 2025.)

**Response:**

Please see attached the logbooks for the SHU, RRU and TBU for the requested timeframe from July 30, 2025, to August 13, 2025.

**9. At the time of the Justice Center's site visit, there was not anyone under the age of 21, over the age of 55, pregnant or with any disability in the SHU.**

**10. Request:**

The Justice Center requests clarification as to where the two individuals were housed on August 6, 2025, at the time of their mental health interviews. If in fact the Bedford Hills Correctional Facility has a Special Population/Diversion Unit, please provide its bed capacity.

**Response:**

Incarcerated individual 1 who is assigned an OMH Level 3 and incarcerated individual 2, who is assigned an OMH Level 6, were transferred from Albion Correctional Facility to Bedford Hills Correctional Facility on August 5, 2025. Both individuals received an intake SHU/RRU/Special Population Diversion Mental Health interview on August 6, 2025, and were placed in RRU for programming. Due to the SHU being closed for renovation at the time, some individuals with confinement sanctions and non-SMI were moved to TBU temporarily due to issue with space until the RRU could accommodate. Each unit has a capacity of 16 participants. Bedford Hills Correctional Facility does not have a Diversion Unit.

**11. Upon review of Tier Hearing materials for all 20 individuals in the sample at Bedford Hills Correctional Facility, it was determined they were appropriate for criteria justifying Tier III confinement and had engaged in behaviors that warranted placement, including violent conduct, assault on staff, and fighting.**

**12. Request:**

Please supply the Justice Center with the most recent list of officers that have received the Tier III Hearing Officer Training as of January 15, 2026.

**Response:**

Please see attached the list of staff who received the Tier III Hearing Officer Training as of January 15, 2026.

**13. Requests:**

Please provide the Justice Center with the rationale behind the extensive number of Tier II hearing extension requests being submitted for disciplinary hearings taking place at the Bedford Hills Correctional Facility, and how many Tier II hearing extension requests were completed due to a hearing officer being unavailable in December 2025.

**Response:**

Our administration continues to emphasize to all hearing officers the importance of completing all disciplinary hearing in a timely manner. In December 2025, Bedford Hills Correctional Facility requested several Tier II hearing extensions to the Special Housing Unit office due to staffing shortages. Our administration has been addressing this by training more staff to conduct these hearings.

**14. Recommendations:**

While the Justice Center understands that it is OMH's stance that the SHU/RRU/Special Population Diversion Mental Health Interview form indicates that the recommendations section only need to be completed upon an individual being admitted to the mental health caseload, the Justice Center encourages OMH executive staff to conduct a review of the policy, adopting best practices similar to those of other facilities in utilizing the SHU/RRU/Special Population Diversion Mental Health Interview form similar to a progress note to document the content of the contact with an incarcerated individual.16 The narrative included in the recommendations section should prioritize ongoing individual need development to better attain their goals, document concerns that staff or the individual may have expressed during the contact, observations made by staff, and useful information used to better engage the individual.

**Response:**

DOCCS will defer to OMH on this recommendation.

**15. Request:**

Please provide the Justice Center with an explanation of the efforts mental health staff made to meet the incarcerated individual's mental health needs during the "DOCCS Prison-Wide Staffing State of Emergency". Specifically, what additional services or assistance was offered to the individuals in the SHU and RRU at the Bedford Hills Correctional Facility at the time the state of emergency was taking place?

**Response:**

DOCCS will defer to OMH on this recommendation.

**16. Requests and Recommendation:**

The Justice Center requests whether OMH staff addressed the above-described situation with DOCCS executive staff due to the false statements provided which may have perpetuated a longer RCTP admissions that wasn't clinically indicated. In addition, the Justice Center recommends that the Bedford Hills Correctional Facility executive team conduct a review to identify the motive as to why the sergeant would provide false statements and if required, provide additional training. Please provide the Justice Center with an explanation pertaining to the follow up conducted, and any corrective action taken.

**Response:**

Our administration continues to encourage collaboration between OMH and both DOCCS security and civilian staff during treatment team meetings and as needed. Any issues that cannot be resolved can be brought to the attention of the executive team for further review. DOCCS continues to maintain a standard for all staff to report any issues accurately and conduct themselves professionally and in an ethical manner. While all staff can provide additional information to assist OMH in their clinical assessments of individuals in RCTP, the decision to discontinue or prolong an RCTP admission is an OMH decision.

**17. Recommendations:**

Given the purpose of the RCTP environment, and the rapidly changing needs of incarcerated patients, repetitive progress notes and inaccuracies in an individual's mental health treatment record can impact daily continuation of treatment. The Justice Center recommends that OMH staff at the Bedford Hills Correctional Facility be retrained in the completion of progress notes, specifically those that fall within the processes of RCTP.

In addition, please provide an update on incarcerated individual 5's MHSL, clinical diagnosis, current housing program, and whether they have had any RCTP admissions since August 14, 2025.

**Response:**

DOCCS will defer to OMH on this recommendation.

Thank you for the opportunity to comment on your report. I look forward to continuing to work productively with the Justice Center to improve the services for our population.

Sincerely,

James Donahue
Associate Commissioner

cc: Linda Carrington-Allen, Superintendent - Bedford Hills Correctional Facility
Stephanie Diamond, Facility Review Specialist