

Budget Report

A.	B.	C.	D.	E.
	Total Langeloth Funding	Funding Received to Date	Expenditures To Date	Unexpended Funds To Date)
I. Personnel				
Susan Weishar	64,683	42,801	33,209	9,592
Mary Baudoin	0	0	0	0
Fred Kammer	0	0	0	0
I. Subtotal	64683	42801	33209	9592
II. Other Direct Costs				
Office Operations				
Supplies	0	0	0	0
Duplicating	0	0	0	0
Telephone	0	0	0	0
Postage	0	0	0	0
Equipment Rental	0	0	0	0
Communications/Marketing	0	0	0	0
Software	0	0	0	0
Computer Time	0	0	0	0
Meeting Costs	0	0	0	0
Travel	19718	13801	11233.7	2567.3
<i>Custom:</i> Detention Watch	750	500	250	250
Network Dues				
II. Subtotal	20468	14301	11483.7	2817.3
Sutotal Sections I & II	85151	57102	44692.7	12409.3
III. Indirect Costs	0	0	0	0
IV. Equipment	0	0	0	0
V.				
Consultant/Contractual Agreements	72000	48000	21278.5	26721.5
Total	157151	105102	65971.2	39130.8

Principal Investigator:

Signature _____

: _____

Date: _____

Financial Officer:

Signature _____

: _____

Date: _____

Progress Report

An Investment for Change: Promoting Human Rights in Prison Corporations

A Project of the Jesuit Social Research Institute

Organization Name: Jesuit Social Research Institute (JSRI)

Project Name: An Investment for Change: Promoting Human Rights in Prison Corporations

Project Number: #2268

Project Start and End Dates: July 1, 2012, to June 30, 2015

Report Submission Date: January 31, 2014

Total Grant Amount: \$157,152

Installment Amount: \$51,727

Funds Received to Date: \$105,102

Expenditures to Date: \$23,233.81

Project Director: Rev. Fred Kammer, SJ, JD

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JSRI Narrative Report for Langeloth Foundation—January 31, 2014

1. Goal and objectives: This is a joint project between JSRI and the Jesuits of the New Orleans Province, who have purchased stock in both Corrections Corporation of America and The GEO Group. We are working in collaboration with over a dozen other religious institutions who are members of the Interfaith Center for Corporate Responsibility (ICCR) to persuade management to review their policies related to international human rights standards, including medical care, diet, exercise, and risk prevention, to assess areas where the company needs to adopt and implement additional human rights policies, institute monitoring, and report to shareholders.

2. Project Implementation during 2013: Progress during the past year includes the following:

1. In late 2012 the National Jesuit Committee on Investment Responsibility agreed to take on GEO as one of their five major engagements. This meant that by early 2013 every Jesuit province in the U.S. and English Canada—ten in all—had purchased stock in GEO—adding nine additional members to our GEO shareholder group. Two additional faith-based investors also joined both our GEO and CCA shareholder groups in 2013—the Dominican Sisters and First Congregational United Church of Christ.
2. In January 2013, GEO sent a draft of their Human Rights policy to our shareholder group for comment. Members of our JSRI Project Team immediately joined other shareholders in suggesting improvements. Although the revised statement which we received in early February, 2013, falls short of our expectations, the company did include several of our recommendations. The document is a good start to a meaningful human rights policy—but only with independent verification of implementation, monitoring, and remediation.
3. Since January, 2013, the project’s Research Fellow, Dr. Sue Weishar, has conducted considerable research and review of curriculum and training materials on human rights trainings in prisons. She advised our shareholder group of her findings in April and May.
4. In March, our human rights shareholder group developed a draft of *Benchmarks for Engaging Private Prisons on Human Rights* to help our group measure/track progress in achieving our goals for CCA and GEO on human rights.
5. During the spring of 2013, there were several exchanges between our shareholder group and corporate attorneys developing the human rights policy. GEO was reluctant to acknowledge any human rights standards beyond current US law and they balked at the UN’s *Guiding Principles on Human Rights*. They failed to incorporate our most substantive concerns regarding accountability, implementation, monitoring, and ongoing assessment; and they flatly rejected the idea of third-party independent monitoring. Despite these troubling issues, the company has adopted a policy that includes some of our recommendation and has committed to “engage in an ongoing dialogue to realize the aspirations [the policy] contains if shareholders agreed to withdraw our shareholder proposal.” In the interest of continuing the dialogue, we withdrew the 2013 Resolution.
6. At its May 7th Annual Meeting in Boca Raton, the Board of Directors of **GEO**, as a direct result of our shareholder advocacy, voted to adopt a company-wide Global Human Rights

Policy. The GEO Global Human Rights Policy is now posted on the company's [website](#). Although the policy falls far short of our expectations regarding accountability, including external, third-party monitoring, and fails to articulate the categories of human rights that have the greatest potential to be violated in prisons, it is a start that we can build on.

7. The GEO Annual Meeting was attended by Dr. Weishar and three other members of our shareholder group from the Jesuits of the California Province. During the meeting Fr. George Williams, S.J., head chaplain at San Quentin State Prison and a member of our shareholder advocacy group, read a statement on behalf of our group congratulating GEO for developing a Human Rights statement and pledging our support to realize its aspirations. After the meeting our group engaged in an informal discussion with company officials, including the Director of Human Resources, on implementing human rights training throughout the company. They appeared eager to begin this process.
8. On May 16th, Dr. Weishar and Mary Baudouin, Assistant for Social Ministries for the New Orleans Jesuit Province, attended the CCA Annual Meeting in Nashville. During the meeting, Ms. Baudouin read a statement urging the company to increase its efforts to adopt and implement a human rights policy, including our critique of the company's new statement, "Protecting Inmate and Detainee Rights." Baudouin and Weishar met with CCA members of the board informally after the meeting to discuss the need for such a policy. Later in the day they met with company lawyers to assess progress and plan for the next dialog. Those representatives indicated that the statement was not meant to be their official human rights policy, promising a policy draft by August/September 2013.
9. On July 24th and 25th, JSRI convened a small working group outside Denver, CO. The group included two prison experts we were able to hire through Langeloth Foundation funding, Professor Fred Cohen--Professor Emeritus of SUNY at Albany's School of Criminal Justice, which he helped to found-- and Rich Subia--former head of prisons for the California Department of Corrections. Also participating were Fr. George Williams, SJ, a prison chaplain at San Quentin, Mark Potter of the Jesuits of the California Province, Mary Baudouin, Sue Weishar, and attorney Keith Vernon, the U.S. Jesuit Conference consultant for investment responsibility. The primary goal of the convening was to engage the experts to develop a strategic approach to our ongoing shareholder engagements with CCA and GEO regarding human rights policy development, implementation, and impact assessment and ongoing monitoring. The meeting produced two resources that will be especially helpful in future dialogues: 1) A set of benchmarks that we can use to determine progress being made by the companies toward implementation of their human rights policies; and 2) a set of very specific questions regarding different aspects of the GEO human rights policy that can be used in future dialogues with GEO. (These can be adapted for use in CCA dialogues as well.)
10. By late September, Mark Potter with the California Jesuit Province had developed, with input from JSRI and others, *A Position Paper on the Implementation of the GEO Group's Global Human Rights Policy*. The paper recommends that GEO: a) articulate a general definition of human rights for the private prison context and identify baseline human rights expectations that will be maintained throughout its operations; b) provide

appropriate processes for training management, front-line employees, and inmates and detainees about human rights; and c) establish meaningful and measurable outcomes to ensure that the company's adherence to the policy is consistent over the long term.

11. On October 8th, Dr. Weishar and Fr. Fred Kammer, SJ, JSRI director, met with College of Law faculty member Bill Quigley and attorney Sara Rosenbaum to discuss a potential spring 2015 conference on International Human Rights and prisons/detention centers.
12. On November 12th, our shareholder group met with CCA officials in Nashville. This was consultant Fred Cohen's first CCA meeting. The meeting was led by Corporate Counsel Scott Craduck. The main purpose of the meeting was to provide our group with a preview of CCA's Human Rights Statement.
13. On December 17th, our shareholder group toured GEO's Riverbend Correctional Facility in Riverbend, North Carolina. This was consultant Rich Subia's first GEO meeting. Afterwards, we had lunch and a three hour dialog with company officials to discuss implementation of GEO's Human Rights policy.
14. In December, the board of CCA met and adopted a Human Rights Statement, which was posted to its website on January 24, 2014: <http://cca.com/Media/Default/documents/Social-Responsibility/Protecting-Inmate-and-Detainee-Rights/Human-Rights-Policy-Statement-2014.pdf>

3. Challenges: Challenges this past year included getting the companies to commit to meeting with us in a timely way, which ended up limiting the number of dialogues we would have liked. Also, officials from one of the companies continue to engage with our shareholder group in a hostile way that suggests they are still struggling to come to terms with the engagement process.

4. Logic model: (Attached). **5. Population served:** NA

6. Next steps: Now that both companies have adopted human rights policies, next steps include seeing that both companies: 1) revisit adopted policies and make them stronger; 2) embed commitment to human rights across companies' practices; and 3) implement an effective human rights due diligence process. In the coming year we plan on contracting with the International Centre for Prison Studies to provide our shareholder group with a webinar on a human rights approach to prison management that would encompass how management could best address concerns #2 and #3, above. We will also continue planning for a potential conference on the application of international human rights law towards U.S. prison reform.

7. Project Director's Opinion and Reaction: That both companies issued human rights policies in the past year is a huge accomplishment. Although we would have preferred to have had more input on the statements that were developed, we nevertheless are glad that both companies are now on record with Human Rights policies that we can begin to improve on.

8. Attachments. See Logic Model, CCA and GEO Policies, and CCA Shareholder Position Paper including "What Investors Want in Correction Corporation of America's Human Rights Policy" and "Benchmarks for Engaging Private Prisons on Human Rights."

Jesuit Social Research Institute: *An Investment for Change: Promoting Human Rights in Prison Corporations*

Overarching Goal: To improve human rights protections for the inmates and detainees in prisons and detention centers operated by the two largest prison corporations in the U.S., Corrections Corporation of America (CCA) and The GEO Group, Inc. (GEO), particularly in the areas of health care, diet, exercise, safety, legal rights, and religious freedom.

Objective 1: To develop and lead a coalition of stockholders in The GEO Group, Inc., and Corrections Corporation of America who, through the use of shareholder resolutions and dialogue sessions, will hold the corporations accountable for human rights practices in their facilities.

Targets for Intervention: Stockholders in GEO and CCA, particularly faith-based organizations and other socially responsible investment organizations.

Inputs	Activities	Outputs	Short-term Outcomes	Impacts	Evaluation Approaches
Staff to coordinate shareholder activity. Communication with other investors to encourage their participation in filing resolutions and attending dialogues. Individuals and organizations who make investments in CCA and GEO for the purposes of shareholder engagement.	Identify and recruit additional shareholders willing to participate in shareholder actions. Communicate with other shareholders regarding progress and need for assistance with dialogues and shareholder resolutions. Methods: e-mail updates, presentations at	The number of shareholders willing to assist in this effort will be doubled. At least half of the coalition shareholders will participate either by phone or in person in dialogues with the companies. 85% of coalition will file shareholder resolutions as needed.	Members of ICCR and other leaders in the socially responsible investment community become more aware of human rights concerns in the private prison industry. Shareholders will be well-prepared for dialogues, allowing for more deliberate requests of CCA &	Increased pressure from shareholders will cause CCA and GEO to be more responsive regarding requests for action and meetings. CCA and GEO will report progress to shareholders at least annually, and will eventually include progress on human rights in their annual reports.	Shareholder activity will be tracked by staff: filing shareholder resolutions and dialogues. CCA/GEO written reports will be assessed to determine: 1) extent to which reports have been disseminated to shareholders; and 2) addressed human rights concerns.

	<p>Interfaith Center for Corporate Responsibility (ICCR) meetings, phone conferences.</p> <p>ICCR database of activities will be updated on a regular basis.</p>	<p>Preparation conference calls will be held before each dialogue.</p> <p>Bi-monthly e-updates will be sent to all coalition members.</p>	<p>GEO management.</p> <p>If shareholder resolutions are used, the number of “yes” votes will at least allow for bringing the concern back for vote in subsequent years.</p>		
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PROGRESS COVERED IN THIS REPORT:

<p>Staff to coordinate shareholder activity.</p> <p>Communication with other investors to encourage their participation in filing resolutions and attending dialogues.</p> <p>Individuals and organizations who will make investments in CCA and GEO for the purposes of shareholder engagement.</p> <p>National Jesuit Committee on</p>	<p>We began the year with nine additional Jesuit provinces, one congregation of religious sisters, and another faith based investor as new members of our shareholders group.</p> <p>ICCR member database was updated on a regular basis to include this project’s progress.</p>	<p>The number of shareholders assisting in our efforts with GEO has grown from 5 original investors to 13. For CCA 2 new groups joined during the year but 2 divested, so the total remains 8.</p> <p>At least half of the shareholder group participated either by phone or in person during the 7 in-person dialogues with the companies held to date.</p>	<p>Socially responsible investment community became more aware of human rights concerns at private prisons at ICCR meetings and during Loyola University New Orleans training.</p> <p>Shareholders were prepared for dialogs, and their comfort level with the issues grew as their knowledge increased.</p>	<p>Increased pressure from shareholders, supported by the expertise of legal and prison consultants, have led both GEO and CCA to adopt human rights statements.</p> <p>NOT YET: CCA and GEO will report progress to shareholders at least annually, and include progress on human rights in their annual reports.</p>	<p>Shareholder activity has been tracked by staff, including notes of dialogue preparation sessions and discussions during dialogues. We also have copies of the shareholder resolutions that were filed.</p> <p>NOT YET: Written reports from CCA and GEO will be assessed to determine: 1) the extent to which reports have been disseminated to shareholders; and 2)</p>
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Investment Responsibility [NJCIR].		<p>NJCIR adopted the GEO Resolution as a national priority, bringing additional strength; the California Province of Jesuits has assumed the lead in these dialogues.</p> <p>Since the Langeloth portion of project began, only 1 resolution was (re-filed). 13 of 14 members (93%) of group filed.</p> <p>Preparation conference calls were held before each dialogue.</p> <p>Database updates were sent out 4 times in last year.</p>			if reports have addressed human rights concerns.
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Objective 2: To convince The GEO Group, Inc. and Corrections Corporation of America to implement, monitor, and report to shareholders on policies and practices related to the human rights of detainees and prisoners in their custody.

Targets for Intervention: Management and key staff of GEO and CCA, especially those most responsible for areas where human rights are in question. Staff of GEO and CCA responsible for day-to-day adherence to and implementation of human rights policies (e.g., guards, medical personnel)

Inputs	Activities	Outputs	Short-term Outcomes	Impacts	Evaluation Approaches
<p>Staff.</p> <p>Legal and prison reform consultants.</p> <p>A minimum of 2 face-to-face dialogues annually with each company as well as attending annual meetings.</p> <p>Funding for travel to dialogues and annual meetings.</p> <p>Spreadsheets or reports on human rights abuses.</p> <p>Sample human rights policies and reporting methods for prisons and detention centers.</p>	<p>JSRI staff will keep an up-to-date spreadsheet on reports of violations of human rights at CCA and GEO prisons and detention centers.</p> <p>JSRI staff will convene at least two face-to-face dialogues each of the first two years and one during the 3rd year of the project with key staff from CCA and GEO.</p>	<p>Violations will be reviewed during dialogues to point out the need for improved conditions and protections, and to measure progress made by the companies.</p> <p>The companies will adopt human rights policies within the first 2 years of interventions. The policies will include methods and schedules for training staff and reporting to shareholders.</p> <p>GEO/CCA staff are trained in protecting rights of inmates and detainees.</p>	<p>Companies will report significant progress towards development and/or implementation of human rights policies at each annual meeting. If this does not occur, shareholders will re-file resolutions to be considered during annual meetings.</p> <p>Companies will make written responses to reported violations and make these available to shareholders.</p> <p>A human rights training program will be implemented for all key staff.</p>	<p>Meaningful implementation reports will be produced on a regular basis.</p> <p>Reported human rights violations will decrease.</p> <p>GEO and CCA staff will possess increased knowledge about human rights of inmates and detainees, resulting in fewer reported violations.</p>	<p>Annual reports for each company will include a section on human rights.</p> <p>Pre-and- post testing of staff regarding knowledge about human rights.</p> <p>Safeguards will be put in place regarding each violation cited.</p>

PROGRESS COVERED IN THIS REPORT:

Inputs	Activities	Outputs	Short-term Outcomes	Impacts	Evaluation Approaches
<p>Staff.</p> <p>Legal and prison reform consultants.</p> <p>A minimum of 2 face-to-face dialogues annually with each company as well as attendance at annual meetings.</p> <p>Funding for travel to dialogues and annual meetings.</p> <p>Spreadsheets or reports on human rights abuses.</p> <p>Sample human rights policies and reporting methods for prisons and detention centers.</p>	<p>JSRI staff kept an up-to-date spreadsheet on reports of violations of human rights at CCA and GEO prisons and detention centers.</p> <p>JSRI staff helped convene 2 face-to-face dialogues with CCA in 2013 and 1 face-to-face dialog with GEO in 2013.</p> <p>JSRI staff attended both companies' annual meetings. JSRI staff made a statement at the CCA annual meeting. A Jesuit from the California Province made a statement for our group at GEO annual meeting.</p>	<p>GEO adopted a human rights policy at its May 2013 Annual Meeting that mentions staff training and stakeholder engagement.</p> <p>CCA adopted a human rights policy at its December 2013 board meeting.</p> <p>NOT YET: GEO and CCA staff receive training in protecting the rights of inmates and detainees.</p>	<p>NOT YET: Companies will report significant progress towards development and/or implementation of human rights policies at each annual meeting. If this does not occur, shareholders will re-file resolutions to be considered during annual meetings.</p> <p>NOT YET: Companies will make written responses to reported violations and make these available to shareholders.</p> <p>NOT YET: Human rights training will be implemented for all key staff.</p>	<p>NOT YET: Meaningful implementation reports will be produced on a regular basis.</p> <p>NOT YET: Reported human rights violations will decrease.</p> <p>NOT YET: GEO and CCA staff will possess increased knowledge about human rights of inmates and detainees, resulting in fewer reported violations.</p>	<p>NOT YET: Annual reports for each company will include a section on human rights.</p> <p>NOT YET: Pre- and- post testing of staff regarding knowledge about human rights.</p> <p>NOT YET: Safeguards will be put in place regarding each violation cited.</p>

WHAT INVESTORS WANT IN CORRECTION CORPORATION OF AMERICA'S

HUMAN RIGHTS POLICY

The policy itself should clearly articulate a **general definition of human and constitutional rights and identify baseline human rights expectations** that will be maintained throughout its operations. These rights should include references to the following:

1. Constitutional rights:
 - a. Eighth Amendment – prohibition of cruel and unusual punishment, including an explanation of
 - i. Conditions of confinement especially as related to life or health threatening conditions
 - ii. Conditions which impact the human dignity of the detained (eg., shields from the exposure of one's body, privacy re: the use of toilets, etc.)
 - iii. Limits on use of force
 - b. Fourteenth Amendment – Due Process: Procedural fairness, such as grievance procedures, opportunity to appear before decision-makers and be heard, opportunity to seek neutral review from a fact-finding of outcome-determinative body.
2. Human Rights as identified in the **Universal Declaration of Human Rights**, which are universal and inalienable. Other rights related to prisoners include the **UN Standard Minimum Rules for the Treatment of Prisoners** and the UN Office of the High Commissioner for Human Rights set of resources on **Human Rights and Prisons**.
 - a. We should probably be looking for rights that are spelled out in at least 3 areas: **health care, use of force, and segregations**. A prison/jail doing an exemplary job in these areas is not likely to be a failure in others while a failure in those areas is a decent predictor of much broader failure. A more expansive version would also include **out-of-cell opportunities and conditions of confinement** (ie., diet, exercise, shelter, hygiene, environmental hazards, overcrowding, etc.)
 - b. Other rights/values that should be specifically mentioned may include: i) Recognition of the inherent dignity of the human person for all prisoners; ii) Prisoner's right to health care, including mental health care; iii) Affirmative guarantee to an adequate standard of living for all prisoners; iv) Goal of prisoner rehabilitation; v) Family visitation and contact with the outside world; vi) Safety and security, including discipline and punishment; vii) Free exercise of religion

As part of the implementation process, the company must commit to providing appropriate processes for **training** management, front-line employees, and inmates and detainees about human rights.

1. **Executive Management.** Executive staff should be trained in the concept of human rights and the terms of the policy. Implementation in the field cannot be expected without buy-in from the top. Executives will need to raise the commitment to human rights in screening, hiring, and evaluating employees who are to be in direct contact with prisoners/detainees.
2. **Front-Line Staff.** The policy must present the policy in a way that affirms and supports the human rights of its staff, particularly front line employees. Human rights training may be integrated into existing curriculum, but the challenge is not simply to cover more content, but to frame all training within an ethical context that affirms and supports human rights and include these standards in employee review and promotion.

3. **Inmates and Detainees.** Some efforts should be made to orient inmates and detainees to the ethical context of the prison. By setting clear and consistent expectations for interpersonal communication and humane treatment on the first day of admission, prisoners will come to understand and hopefully reciprocate the human-rights supportive context and culture of the prison.

To assure that its human rights policy is making a difference, CCA should commit to **tracking, demonstrating and reporting** in detail on the implementation of its human rights policy and the positive impact it is making in an annual report to their board and shareholders. This type of accountability should ideally take 2 different forms:

1. **External Monitoring.** Shareholders believe that external monitoring of a human rights resolution is the most effective mechanism to assure shareholders that the good faith language of the resolution is being implemented. Such monitoring by independent professional can target specific agreed upon facilities. External oversight may provide the additional gain of fending off or prevailing in lawsuits in areas encompassed by most lawsuits.
2. **Establishing and Adhering to Specific Benchmarks.** We recommend the following benchmarks, some of which have already been referred to above.

Benchmarks for Engaging Private Prisons on Human Rights

I. Company Acknowledges Importance of Issue

1. Company acknowledges a commitment to respect fundamental human rights
2. Company begins to map human rights risks to which they are exposed in the course of its direct operations
3. Company begins to map human rights risks throughout its supply chain

II. Company adopts Policy (whether a summary of key points is included here or not, is not clear to me)

1. Company develops human rights policy with clear goals and guidelines based on (or with reference to) the UN Guiding Principles on Business and Human Rights
2. Company consults appropriate NGOs and community groups while developing its policy
3. Company's policy specifically addresses training and evaluation for all staff
4. Company has a zero tolerance policy for human rights abuses throughout its operations

III. Promulgation and Training

1. Company promulgates the policy to employees.
2. Company initiates a timeline for training existing employees and integrating human rights training into new employee training.
3. Company develops appropriate training materials and engages ICCR coalition for input and feedback
4. Company requires all employees to sign when they have completed training.

IV. Integration into new contractual arrangements

1. Company develops and implements strategy for appropriate inclusion of policy in future contractual arrangements.
2. Company includes a commitment to human rights in assessing contractors and future contracts.

3. It is expected that vendors with whom the company contracts or purchases services will hold themselves and their employees accountable to the same level of care for inmates/detainees as the company.

V. Oversight and Monitoring

1. The policy is integrated into existing internal oversight and monitoring programs and a program and process is created for reporting to the board on implementation progress.
2. A mechanism for sharing results of oversight and monitoring with key stakeholders and shareholders is developed and implemented.

VI. Regular Review of the policy

1. Company develops a program and process for regular review of the policy leading to a (semi-annual) [annual] report focused on whether the content or process of the policy needs revision.

VII. Implementation Detail – Ongoing Compliance & Quality Control

1. Company pilots and develops metrics and processes for assessing compliance with the rule of law as expounded in the Human Rights Policy.
2. Metrics shall include an annual report on the status and outcomes of lawsuits filed against the company regarding conditions of confinement¹ for persons in custody and the rights of employees.
3. Company integrates a system to track and record the incidence of human rights complaints shares the trends with stakeholders.

VIII. Company's Strategic Focus Leads to Demonstrable Positive Impact

1. Company tracks, demonstrates and reports in detail² on positive impact of policy and implementation.
2. Company refines policy and implementation as needed in light of its impact evaluation as per #1 above.

IX. Independent Verification

1. Company agrees to external, independent assessment of policy, implementation and impact.
2. Independent assessors shall have no other business relationship with the company or any other private provider of correctional services.

X. ICCR acknowledges company's work

1. Interfaith Center for Corporate Responsibility publically acknowledges the company's positive actions through such vehicles its annual report, Corporate Examiner, public area of website and press releases.
2. The Interfaith Center for Corporate Responsibility determines when to strategically recognize the company's progress.

¹ Conditions of confinement include use of force, which includes mechanical and chemical restraints; segregation (or "penal isolation"); access to healthcare, including medical, mental, and dental care; diet, rehabilitation; education in appropriate settings, exercise and outdoor recreation, personal and facility hygiene, visiting rights, access to religious programs, disciplinary proceedings, grievance procedures, and access to the courts.

² See footnote 1 for detail on "conditions," which may be a useful guide to what constitutes "detail."