



**To:** The White House

**From:** ADL

**Subject:** Suggested Provisions for Antisemitism National Strategy

**Date:** January 27, 2023

**Purpose:** To convey ADL perspectives on options for the White House National Strategy for Combating Antisemitism

The Anti-Defamation League (ADL) urges the White House Interagency Policy Committee (IPC) to consider several inclusions as it develops a national strategy to combat antisemitism and expand federal efforts to counter antisemitism, Islamophobia, and other forms of bias. These inclusions come from ADL’s [COMBAT Plan](#) to fight antisemitism, [PROTECT Plan](#) to combat domestic extremism, and [REPAIR Plan](#) to address online hate. Combined, these three comprehensive plans round out ADL’s policy approach to stopping “the defamation of the Jewish people and to secure justice and fair treatment to all.” As the White House has also made clear, these threats not only target Jews and other marginalized and vulnerable communities, but also pose some of the most salient risks to our democracy. Each of these items are organized within broad categories highlighting the overall needs they address.

#### **FEDERAL IMPLEMENTATION**

1. Establish an Antisemitism Senior Policy Operating Group (SPOG)
2. Name Assistant Secretary-Level Positions to Coordinate Strategy Implementation
3. Recognize the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism as an Educational Resource
4. Expand Federal Agency Portfolios to Address Antisemitism

#### **ADDRESS ANTISEMITIC NORMS**

5. Create an Antisemitism Federal Acquisition Regulation (FAR)
6. Implement Antisemitism Diversity, Equity, Inclusion, and Accessibility (DEIA) Training for All Federal Employees
7. Create a “National Healing” Priority for AmeriCorps
8. Establish a Presidential Innovation Fellows (PIF) Challenge

#### **PROMOTE NATIONAL SECURITY**

9. Conduct an Antisemitic Violence Threat Assessment
10. Review Security Clearance Protocol to Eliminate Antisemitic Exclusion of Jews
11. Fund Antisemitic Terrorism Prevention
12. Conduct Research on Antisemitism, Including in Government
13. Create an Online Extremism Clearinghouse

## **STRENGTHEN THE U.S. SPECIAL ENVOY TO MONITOR AND COMBAT ANTISEMITISM**

14. Elevate the Rank of the U.S. Special Envoy to Monitor and Combat Antisemitism to a Special Presidential Envoy
15. Create Permanent Staff for the Office of the Special Envoy to Monitor and Combat Antisemitism

## **EXPAND EDUCATION EFFORTS**

16. Issue Department of Education's Office for Civil Rights (OCR) Regulations to Ensure Antisemitism Remains Covered
17. Review the State of Holocaust and Antisemitism Education
18. Prioritize Anti-Bias Education and Holocaust Awareness in Schools
19. Support Global Holocaust and Antisemitism Education

## **ADDRESS ONLINE ANTISEMITISM**

20. Support a Whole-of-Government Approach to Combat Online Harms, Including Antisemitism
21. Support Transparency and Accountability Measures to Uncover and Mitigate Antisemitism
22. Support Banning Surveillance Advertising
23. Raise Awareness About and Support Efforts to Hold Perpetrators Accountable for Cyber Harassment, Including that which is Antisemitic
24. Support Digital Education Addressing Online Disinformation, Antisemitism, and Other Harms
25. Support Narrow Efforts to Regulate Online Platforms that Balance Free Expression with Accountability

## **LEVERAGE KEY PARTNERS**

26. Engage with Congress
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## **FEDERAL IMPLEMENTATION**

### **Establish an Antisemitism Senior Policy Operating Group (SPOG)**

Following the conclusion of the interagency process to develop a national strategy to combat antisemitism, the Administration should establish an antisemitism Senior Policy Operating Group (SPOG). A SPOG structure could be modeled on the trafficking in persons SPOG and provide a comprehensive and coordinated approach to ongoing implementation of the newly developed national strategy, which would ensure that the federal agencies involved in the fight against antisemitism have a standing, specialized resource to work together effectively and efficiently to achieve their shared goals.

A SPOG on antisemitism would need to be led by a senior-level official, and would bring together representatives from relevant federal agencies including, but not limited to, the Department of Homeland Security; the Department of Justice, including the Federal Bureau of Investigation; the Department of Education, including the Office for Civil Rights; and the Department of State, including the Office of the Special Envoy to Monitor and Combat Antisemitism, the Office of the Special Envoy for Holocaust Issues, and the Office of International Religious Freedom; in addition to representatives from the Intelligence Community; the Equal Employment Opportunity Commission; and the United States Holocaust Memorial Museum. The Administration could establish a quarterly Deputies Committee (DC) meeting to review the progress of the SPOG and the implementation of the strategy.

The SPOG would be responsible for monitoring and evaluating the progress of the national strategy, coordinating the efforts of the various federal agencies involved and ensuring that the strategy is being implemented consistently and effectively, and insourcing key expertise and specializations specific to antisemitism to create a standing resource for federal agencies. The SPOG would also ensure involvement by principals from each of the agencies, guaranteeing buy-in at the highest levels.

### **Name Assistant Secretary-Level Positions to Coordinate Strategy Implementation**

The national strategy should name an Assistant Secretary-level position at each implementing agency to coordinate the implementation of the strategy to combat antisemitism, to make certain that it is effectively implemented. These positions would create a clear chain of command and comprehensively evaluate the efficacy of the agencies' efforts and recommend changes where necessary. These individuals would be able to provide the necessary oversight to make sure that the strategy is being implemented in line with the White House's goals and provide regular updates and progress reports on the strategy's progress. Such positions would provide much-needed guidance and coordination to ensure that the strategy is implemented in its entirety and that all of the necessary steps are taken to combat antisemitism. By having dedicated individuals with antisemitism-specific authority, the Administration can ensure accountability and have a better understanding of the strategy's progress and be able to make any necessary adjustments to ensure that the strategy is effective in combating antisemitism. The White House should name an official Special Assistant to the President (SAP) rank to convene and provide guidance to the Assistant Secretaries, and who can facilitate quarterly DCs.

## **Recognize the International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism as an Educational Resource**

Defining antisemitism is the first step in understanding the problem. The federal national strategy on antisemitism should include recognizing the IHRA Working Definition of Antisemitism as a legally nonbinding definition, similar to the way the Department of State adopted the definition in 2016. The IHRA definition is the most widely accepted definition of antisemitism and is already being used by more than 36 countries, more than 28 states, and several academic institutions, counties, and towns. Adopting the IHRA definition as a legally nonbinding educational resource will ensure that all those affected by antisemitism can have a clear understanding of what it is and are able to identify it and respond appropriately. Federal recognition of the IHRA Working Definition will further normalize it and will provide a strong basis for the development of effective national strategies to address antisemitism in other countries.

## **Expand Federal Agency Portfolios to Address Antisemitism**

The federal government should expand agency portfolios to address antisemitism, particularly within existing civil rights offices and those with security authorities, as a crucial step for effectively combating this hatred through a whole-of-government approach. A focus on existing civil rights offices within government agencies allows for the leveraging of existing resources, such as funding and staff, to ensure that they have the necessary capabilities and training to address antisemitism. Further, ensuring that agencies with intelligence and law enforcement authorities have antisemitism expertise can ensure a specialization in mitigating antisemitic violence that may rise to a national security threat. Expanding agency portfolios to address antisemitism also demonstrates the government's commitment to permanently addressing this issue and would send a message to the Jewish community and other stakeholders that the government takes the issue seriously. Specialized units within agencies that focus on antisemitism will allow for the development of specialized expertise on a nuanced and complex issue, and guarantee that it will be given the attention it needs within the agencies, as well as create a point of contact for the Jewish community and other stakeholders to coordinate efforts to address antisemitism.

## **ADDRESS ANTISEMITIC NORMS**

### **Create an Antisemitism Federal Acquisition Regulation (FAR)**

Creating a Federal Acquisition Regulation (FAR) to require contractors to take training on the nature and scope of antisemitism, as well as best practices for avoiding and addressing it, would be an important step towards making sure that the federal procurement process is conducted in a manner that is free from discrimination. This training would also ensure that contractors understand and recognize antisemitism, an important step in fighting the normalization of this hatred. This training could be implemented as a condition for doing business with the federal government for contractors of a certain size or implementing a certain type of contract (e.g.

national security or civil rights), and could be required for all employees and management staff of the contractor.

Implementation of this FAR would need to be done through executive authority, such as the federal acquisition rulemaking process, including publishing the proposed rule in the Federal Register, allowing an opportunity for public comment, and ultimately issuing the final rule. The training could be provided by external organizations or experts, and the government could create a list of approved training programs that contractors could choose from. This FAR would be a positive step in creating a culture of zero tolerance of discrimination, including antisemitism.

### **Implement Antisemitism Diversity, Equity, Inclusion, and Accessibility (DEIA) Training for All Federal Employees**

As the U.S. federal government is the nation's largest employer, including antisemitism DEIA (diversity, equity, inclusion, and accessibility) training for all federal employees will allow the national strategy to reach the largest number of people in one program. DEIA training will ensure that the federal workplace is free from discrimination and harassment, and that all employees feel respected and valued. As ADL data shows, antisemitism is reaching its highest level in more than 40 years, and many individuals simply do not understand that certain actions or statements are inherently antisemitic. There have been several high-profile antisemitic incidents in the federal government in recent years – including a swastika carved into an elevator at the Department of State, a swastika found painted in a secure facility, and at least one ongoing blog spouting antisemitic ideas by a federal employee. Training all federal employees on understanding and addressing antisemitism would help create a safe and inclusive environment for all employees, including Jewish ones. By providing education and training on antisemitism and other forms of discrimination, federal employees will be better equipped to recognize and respond to incidents of discrimination and harassment, and to work towards creating a more inclusive and equitable workplace.

### **Create a “National Healing” Priority for AmeriCorps**

The Corporation for National and Community Service (CNCS) administers national service programs that provide young Americans with opportunities to serve their communities and gain valuable skills in a cost-effective manner. CNCS should prioritize funding for NGOs that focus on fighting hate and healing communities. This could result in increased federal funding for groups with proven track records such as Interfaith Youth Corps that engage college students in inter-religious activities; Catholic Relief Services, an NGO that engages young people in domestic and international service activities; and Repair the World, a volunteer program that involves students in volunteer activities with community-based organizations in local areas around universities.

### **Establish a Presidential Innovation Fellows (PIF) Challenge**

Presidential Innovation Fellows (PIF) can provide quick and effective solutions to government challenges, including federal challenges that rely on data, adaptability, and creative thinking. The U.S. Digital Service should work with Departments and Agencies implementing the strategy to

create approximately two PIF projects per year that specialize in addressing antisemitism. This key mechanism can use existing authorities to create valuable change and help build creative new efforts to address the threat.

## **PROMOTE NATIONAL SECURITY**

### **Conduct an Antisemitic Violence Threat Assessment**

The President should authorize the Office of the Director of National Intelligence (ODNI) to create a national intelligence finding on violent threats resulting from antisemitism. Antisemitism is a common threat stream across several different violent extremist ideologies, including those typically addressed by different silos of intelligence analysis. ODNI should create a National Intelligence Assessment to determine how antisemitism can manifest as a national security threat, as well as the key threat streams that animate it and themes that will help Departments and Agencies understand the challenge.

### **Review Security Clearance Protocol to Eliminate Antisemitic Exclusion of Jews**

Security clearances are a privilege granted to highly trusted employees, as well as a tool for safeguarding highly sensitive information. Known antisemites should not be permitted security clearances, especially because they may sympathize with conspiracies motivating some of the country's most grave national security threats. The Administration should conduct a review of screening for extremist sympathies in the security clearance process, including efforts to ensure that those who are granted clearances do not harbor antisemitic views. This review should also ensure that Jewish Americans are not unduly targeted with accusations of dual loyalty towards Israel, or any other country, when undergoing this process.

### **Fund Antisemitic Terrorism Prevention**

As part of the PROTECT plan, ADL recommended an increase in prevention measures to address violent extremist radicalization and recruitment. The Center for Prevention Programming and Partnerships (CP3) funds grants for community initiatives oriented around resilience that can prevent extremist conspiracies from taking hold in our communities and off-ramp individuals before they choose violence. It is the only federal grant program dedicated to enhancing prevention capabilities in local communities, and as such, has a key role in keeping antisemitism from becoming antisemitic violence. But this community resilience approach to preventing terrorism has been chronically underfunded. The budget for the Center for Prevention Programs and Partnerships grant program should be increased, in addition to robust program evaluation funds to ensure funded programs are adequately evaluated. One of the program goals for grantees should be to specifically address antisemitic violence.

### **Conduct Research on Antisemitism, Including in Government**

The Administration should use existing research resources – such as those at the Department of Homeland Security's Science and Technology Directorate (S&T) and the National Institute of Justice (NIJ) – to supplement existing research with antisemitism-specific research, such as how antisemitism fuels violence across different extremist ideologies. Moreover, federal agencies

should conduct a study reviewing current instances of antisemitic tropes in government to signal that it takes antisemitism seriously and is willing to take the necessary steps to address it internally within the government, as well as externally.

Research helps better inform policy and can expose the true nature of the concern. In recent years, there have been the occasional accusations of antisemitic tropes in government service, such as accusations of dual loyalty of potential Jewish employees to Israel or direct acts of antisemitic graffiti. These create a dangerous environment for current Jewish government employees. A review of the current scope of these tropes would develop effective strategies to address it and to measure the success of those strategies over time. Such research would help identify patterns and trends in antisemitism, and this will aid in developing targeted strategies to combat it. This will also allow for the identification of specific areas where the problem is particularly acute, enabling targeted interventions in those areas. Performing the research internally within the government would help to improve the overall climate of inclusiveness and tolerance within government institutions and create an equitable space for all Americans to serve in the government, including those who are Jewish.

### **Create an Online Extremism Clearinghouse**

Antisemitic threats from domestic terrorists reverberate in digital spaces – from coordination to plotting to propaganda. Law enforcement agencies can be caught off guard and social media companies have repeatedly failed to see warning signs. Sometimes, this is due to a lack of preparedness. Other times, however, this is due to a rightful limitation on law enforcement’s ability to conduct mass monitoring of social media platforms, in order to protect civil liberties and due process rights; such limitations are warranted and necessary. In light of these constraints, independent nonprofit organizations can play an important role in preventing domestic terrorists from committing acts of violence. Independent nonprofits are rightfully separated from powerful criminal justice institutions, notably their independence from surveillance and intelligence authorities; if adequately independent, a Congressionally Chartered Organization (CCO) is well-positioned to provide tips to law enforcement after carefully vetting information it has proactively sought (outside any influence or solicitation from law enforcement). Therefore, ADL has circulated to the Administration – NSC, DHS, and DOJ – a proposal for an independent online extremism clearinghouse. It could serve as an early warning center for antisemitic online conspiracies, acting as a 24/7 clearinghouse for online extremist threats by conducting online tracking and investigation activities – completely independently of law enforcement and other government authorities – and provide early warning support to law enforcement through pre-vetted tips of suspected criminal activities. While the clearinghouse would address all forms of extremism, its charter should include a mandate for addressing antisemitic conspiracies.

### **STRENGTHEN THE U.S. SPECIAL ENVOY TO MONITOR AND COMBAT ANTISEMITISM**

#### **Elevate the Rank of the U.S. Special Envoy to Monitor and Combat Antisemitism to a Special Presidential Envoy**

Whether the Special Presidential Envoy for Climate Change, Special Presidential Envoy for Hostage Affairs, or Special Presidential Envoy for the Global Coalition to Counter ISIS – the

rank of Special Presidential Envoy has been provided to senior officials to conduct business at a high rank and represent interagency equities. While it is helpful to have an Ambassador to address antisemitism at the State Department, addressing antisemitism can hardly be contained to diplomacy, and it is pervasive enough – and a significant enough security concern – that elevating the role to Special Presidential Envoy to Monitor and Combat Antisemitism can help streamline efforts and elevate the priority of the issue. Moreover, one reason the Special Envoy to Monitor and Combat Antisemitism was elevated to the rank of Ambassador was to signify the importance of its role. As all U.S. Special Envoys become Senate-confirmed positions, another elevation of the antisemitism role is needed to highlight the urgency of the issue.

### **Create Permanent Staff for The Office of the Special Envoy to Monitor and Combat Antisemitism**

The Office of the Special Envoy to Monitor and Combat Antisemitism (SEAS), charged with advancing U.S. foreign policy on antisemitism, remains a critical element of America's role in the fight against antisemitism around the world. SEAS continues to face issues due to a lack of regular staffing levels, particularly due to having only four Full Time Employees (FTEs), of which one is Senate-confirmable. This creates several challenges for the office. With zero permanent staff, there is a lack of continuity and institutional knowledge within the office between administrations. With the Special Envoy now being a Senate-confirmable Ambassador, at minimum 25% of the office is unable to work on day one of an administration. In practice, this number is likely to be much higher. Creating 6-8 permanent staffing positions will allow SEAS to transition between administrations while maintaining office space and detailees most successfully within the State Department. This will also allow the office to operate without needing to rely on outside contractors and other temporary staff. This process could be done by creating a line item within the presidential budget or could be created through the Secretary of State.

### **EXPAND EDUCATION EFFORTS**

#### **Issue Department of Education's Office for Civil Rights (OCR) Education Regulations to Ensure Antisemitism Remains Covered**

As the Administration has long discussed, it should amend its regulations implementing Title VI of the Civil Rights Act of 1964 in response to Executive Orders 13899 on Combating Anti-Semitism and 13985 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. The proposed regulations should implement the Executive Orders to address enforcement of Title VI by the Department's OCR in cases involving harassment and other discrimination based on shared ancestry or ethnic characteristics. This regulation has been discussed multiple times but was recently delayed again, this time with a proposed date of December 2023.

#### **Review the State of Holocaust and Antisemitism Education**

The Administration should conduct a study of Holocaust and antisemitism education efforts in states, local educational agencies, and public elementary and secondary schools to create a single



source of information on the issue. In addition to an authoritative compilation of national efforts, this would help the government and nongovernmental organizations understand current education gaps and provide better resources on the Holocaust and antisemitism. Specifically, the Director of the United States Holocaust Memorial Museum (USHMM) should conduct a study to determine whether states and local educational agencies require Holocaust and antisemitism education as part of the curriculum; identify states and local educational agencies that have optional Holocaust and antisemitism education as part of the curriculum; identify each state's standards and local educational agency's requirements relating to Holocaust and antisemitism education, and summarize the execution of said mandates; determine whether public schools use certain qualitative and quantitative strategies in their Holocaust and antisemitism education; identify the types of instructional materials used to teach students about the Holocaust and antisemitism; identify the duration and comprehensiveness of any Holocaust-related courses/lessons provided by public schools; and identify the approaches used by schools to assess outcomes.

### **Prioritize Anti-Bias Education and Holocaust Awareness in Schools**

As America's students seek to thrive in a country with changing demographics and compete in a globalized economy, the U.S. Department of Education (DoE) should create a focus on anti-bias education. This would be an inclusive effort to build awareness for diverse cultures within our country and teach empathy around issues of difference. Such work should be done in an evidence-based manner wherever possible, asking school districts to share data about proven approaches so that DoE can scale what works. Moreover, Holocaust, genocide, and antisemitism education should be a cornerstone of this type of programming because research has demonstrated that young people lack awareness of these issues. Building on the Never Again Education Act, DoE can work with Congress and USHMM to ensure that more districts adopt this type of content into their curricula.

### **Support Global Holocaust and Antisemitism Education**

ADL research has shown that Holocaust education encourages empathy and tolerance and can help curtail antisemitism. The office of the U.S. Special Envoy to Monitor and Combat Antisemitism should work with U.S. embassies around the world, key State Department partners, and local contacts to advocate for and assist countries with establishing or improving Holocaust and antisemitism education programs. The State Department should especially dedicate outreach to and resource-sharing with countries that joined the Abraham Accords to provide educational material and share best practices for conducting robust Holocaust and antisemitism education programs.

### **ADDRESS ONLINE ANTISEMITISM**

#### **Support a Whole-Of-Government Approach to Combat Online Harms, Including Antisemitism**

The Administration should establish a coordinated, whole-of-government approach to combat online hate, harassment, and extremism – including online antisemitism – at home and abroad.

To do this, the Administration should take actions modeled after the Digital Services and Oversight Safety Act introduced in 2022 by Reps. Trahan, Schiff, and Casten, including:

1. creating an inter-agency task force, commission, or convening body to outline a comprehensive transparency framework for platforms (i.e., on content moderation, recommender systems, digital ads, high-reach content, internal research, and other information identified by the FTC);
2. developing a proposal for tiered access to social media data and specifically recommending what type of information should be freely available to the public and what should be available to specific research entities;
3. directing the creation and dissemination of best practices to mitigate systemic risks from algorithmic amplification of problematic content, including regarding the dissemination of illegal content/goods, or the facilitation of illegal activity; negative effects on rights established by the U.S. Constitution; discrimination based on a protected class; any malfunctioning or intentional manipulation of platform services, including the amplification of illegal content, content in breach of community standards or “any other content with an actual or foreseeable negative effect on the protection of public health, minors, civic discourse, electoral processes and public security.”

The Administration could also take actions modeled after Section 5860 of the 2023 House NDAA which authorized \$20,000,000 to support the State Department in efforts to create an International Center for Research on the Information Environment, which would allow for cross-platform and cross-border studies of the flow of extremism content, including antisemitism, and provide insights into algorithmic amplification, recommender systems, and ad targeting’s role in online incitement to violence.

### **Support Transparency and Accountability Measures to Uncover and Mitigate Antisemitism**

The Administration should support transparency requirements, bolster independent research, and ensure consistent audits from social media and online game platforms. To do this, the Administration could support transparency mandates including California’s new transparency law [AB 587](#), which ADL had a key role in drafting. The Administration could also raise awareness about hate and extremism, including antisemitism, in online games. To do this, the Administration could 1) convene experts (roundtable, panel conversation, etc.) to educate and develop consensus policy solutions; 2) apply pressure on online multiplayer game companies to close gaps in their terms of service and moderation policies; 3) ensure policy solutions for online multiplayer games are included in future work.

### **Support Banning Surveillance Advertising**

The Administration should support banning surveillance advertising to disrupt harmful business practices and protect consumers—including from antisemitism. The Banning Surveillance Advertising Act introduced in 2022 by Rep. Eshoo, Schakowsky, and Sen. Booker included: 1) directing relevant agencies or commissioning research from outside experts to investigate harms associated with targeted advertising and propose legislative, regulatory, and policy solutions; 2)

using current administrative subpoena authorities to obtain information about social media companies' surveillance advertising practices, discriminatory targeting, and non-commercial advertising practices (issue-based).

### **Raise Awareness About and Support Efforts to Hold Perpetrators Accountable for Cyber Harassment, Including that which is Antisemitic**

The Administration should raise awareness about, and hold perpetrators accountable for, doxing, swatting, cyber harassment, and other forms of digital abuse. To do this, the Administration could explore supporting legislative efforts like Rep. Clark's Online Safety Modernization Act of 2017 that would ban doxing, swatting, and other forms of cyber harassment/abuse as well as devote funds to stopping such acts. The Administration could also encourage departments and agencies to develop research and threat assessments on such problems and then disseminate them to State, local, tribal, and territorial partners, and, when appropriate, civil society and community stakeholders.

### **Support Digital Education Addressing Online Disinformation, Antisemitism, and Other Harms**

The Administration should explore opportunities to expand digital literacy education to address online misinformation and disinformation, including related to antisemitism. There are currently several federal government programs aiming to tackle this issue. This process could be done through the National Telecommunications and Information Administration (NTIA), within the U.S. Department of Commerce.

### **Support Narrow Efforts to Regulate Online Platforms that Balance Free Expression with Accountability**

The Administration should support targeted legislation to end the sweeping immunity of online platforms, especially for their role in recommending and amplifying content that incites violence, discriminates against users, and promotes terrorism. Reform of this nature must be focused and learn from past mistakes, ensuring it does not suppress free speech or stymie innovation. The Administration could consider specifically supporting the Protecting Americans from Dangerous Algorithms Act introduced in 2021 by Rep. Malinowski, Eshoo, and Sen. Lujan.

## **LEVERAGE KEY PARTNERS**

### **Engage with Congress**

The White House Office of Congressional Affairs should continue to engage with key Congressional leaders to ensure a coordinated and collaborative approach to addressing antisemitism. Specifically, this means ongoing coordination with the House and Senate Bipartisan Task Forces for Combating Antisemitism and the U.S. members of the Interparliamentary Task Force to Combat Online Antisemitism. By working with Congressional leaders on this issue, the Administration can ensure that legislators who have been vocal champions on this issue have the capacity to continue to work on laws and policies that can

effectively address the problem. This type of action will help build support and momentum for the national strategy among other parts of government and can help to ensure that it stays as an ongoing approach to fighting antisemitism beyond the current Administration.

### **Engage with Jewish Community Leaders**

The Administration should continue to engage with Jewish community leaders through roundtables, briefings, and the White House Liaison to the American Jewish Community, as it did with the December 2022 roundtable on antisemitism. Leaders of Jewish organizations have a unique understanding of the experiences and challenges facing their community. They bring a wealth of knowledge and expertise on issues related to antisemitism and are able to wholly devote their time to developing resources, data, and strategies. Engaging with Jewish community leaders also allows for a more inclusive and collaborative approach to tackling antisemitism, ensuring that the voices and perspectives of those most directly impacted are taken into consideration. The Administration can play a convening role with civil society groups to explore the relationship between antisemitism, other forms of identity-based hate, political violence, and threats to democracy. At a time of rising antisemitism, directly engaging with community leaders will help make sure Jewish Americans understand the government is working to address the concerns of their community.

## **PROTECT COMMUNITIES FROM HATE**

### **Supporting the Non-Profit Security Grant Program (NSGP)**

For the past decade, funding assistance from federal, state, and local governments has provided crucial support for security hardening and enhancements for our nation's non-profit institutions, including religious institutions. This responds to the continuous targeting by violent extremists of synagogues, mosques, churches, temples, and other houses of worship and religious gathering places.

The Non-Profit Security Grant Program (NSGP) provides non-profits with the capacity to increase their defense against these threats, including physical security and cybersecurity capacity and coordination.

Despite recent increases in the NSGP program, as extremism threats continue to rise, the need continues to be greater than the resources provided, as outlined in previous Presidential budget requests. For the FY 2022 grants, nearly \$450 million in grant applications were received for this program. At a time of increased vulnerability to threats of hate-motivated violence by domestic extremists, the Administration should significantly increase funding for non-profit religious institutions and other non-profit organizations that government and law enforcement authorities objectively determine are at high risk of attack.

In assessing the risk, the Administration should consider objective factors such as prior attacks against similarly situated institutions or organizations, and the vulnerability and financial needs of the specific institution. Officials should also consider what the criteria for "terroristic threats" are and how they should be included by NGOs when they are assessing such threats for their

applications. For example, the current inclusions are relatively narrow and could potentially leave out some nuanced, yet pervasive, extremist threats that are strongly influenced by white supremacy, antisemitism, or misogyny. And finally, these programs should seek to promote equity by expanding the reach of the grant to more communities affected by security threats and experiencing other vulnerabilities.

### **Improving Hate Crime Reporting**

Fighting hate crime is a critical task, especially now that antisemitism, anti-Asian American violence, and other forms of racism and bigotry are at all-time high levels. It is particularly alarming that the Federal Bureau of Investigation (FBI) hate crime statistics for 2021 convey the lowest participation from cities and states in two decades. At a time when communities across the country are feeling increasingly vulnerable to bias-motivated crimes and extremist-fueled attacks, critical funding at the highest level is required to combat hate-motivated violence. The Administration should place greater emphasis on addressing bias-based crimes and resolving the alarming gaps in data collection and reporting.

Even with huge swaths of data from some of the largest jurisdictions in the country missing, the 2021 report was extremely alarming. A total of 7,262 hate crime incidents were reported across the country in 2021, the third-highest number in a decade.

One of the biggest impediments to developing a complete picture of the scope and nature of hate crimes in this country – and therefore having the ability to design and implement a fulsome response – is the lack of comprehensive and reliable data. This is not a new problem. The FBI has struggled to collect and compile accurate data on hate crimes since the enactment of the Hate Crime Statistics Act (HCSA) in 1990. There are concerning signs that the problem may be getting worse. According to data from the FBI, there has been a consistent decline in the number of law enforcement agencies participating in the federal hate crime reporting program since 2018. Furthermore, even among agencies that are in theory participating in the program, far too many report zero hate crimes, raising concerns about the accuracy of the numbers.

To resolve the huge swaths of missing data from some of the largest jurisdictions in the country, critical attention and funding is required. The Jabara-Heyer NO HATE Act, enacted in 2021 as part of the COVID-19 Hate Crimes Act, contains key provisions to help improve hate crime data collection and reporting, including authorizing grants to promote hate crime training, prevention, best practices, and data collection initiatives; assistance to law enforcement agencies in implementing the National Incident-Based Reporting System (NIBRS) crime data reporting system; and grants to develop state hate crime reporting hotlines to refer individuals to local law enforcement and support services.

The Administration should fully fund the grant programs authorized by the COVID-19 Hate Crimes Act to support state and local efforts to implement the National Incident-Based Reporting System, create hate crime reporting hotlines, and train officers and develop protocols for identifying, investigating, and reporting hate crimes.

The Administration should also ensure the FBI conducts outreach and provides technical assistance to law enforcement agencies that have not consistently reported hate crimes data, with particular attention to small agencies with the fewest resources for administrative management and data analysis. In addition, the strategy should include continuing to ask State, local, and tribal law enforcement agencies to include the cost of participation in the FBI's HCSA program for the purposes of calculating extraordinary expenses associated with the investigation and prosecution of hate crimes under Public Law 111– 84, section 4704(b)(3).

## **APPENDIX**

### **ADL Policy Plans**

[ADL's COMBAT Plan](#) to fight antisemitism.

[ADL's PROTECT Plan](#) to combat domestic extremism.

[ADL's REPAIR Plan](#) to address online hate.

### **ADL Notable Reports and Studies**

[ADL's 2021 Audit on Antisemitic Incidents](#) – Each year, the ADL's Center on Extremism tracks incidents of antisemitic harassment, vandalism and assault in the United States. ADL's 2021 Audit tabulated 2,717 antisemitic incidents throughout the United States, representing a 34% increase from the previous year and the highest number on record since ADL began tracking antisemitic incidents in 1979.

[ADL's Antisemitic Attitudes in America Report](#) – ADL has measured antisemitic attitudes among Americans since the early 1960s. Building on this historic work and furthering it to ensure greater accuracy, ADL, the National Opinion Research Center at the University of Chicago (NORC) and the One8 Foundation embarked on a year-long process to study the research literature on bias and antisemitism, convene academic and communal leaders and conduct qualitative interviews. This report was published in January 2023.

[ADL's Online Hate and Harassment Survey](#) – Each year, ADL conducts a nationally representative survey of hate and harassment online to find out how many Americans experience incidents of hate and abuse on social media.

[Antisemitism and Threats to American Democracy](#) – An op-ed by ADL's Eileen Hershenov and Ryan Greer published in Just Security. This article discusses the impact of antisemitism on ongoing threats to democracy and political violence, and what can steps can be done to combat these challenges.