

“One Year Later: The U.S. National Strategy to Counter Antisemitism — Legal and Operational Aspects”¹

Throughout the history of the United States, there has never been a federal government plan to counter antisemitism. That changed on May 25, 2023. On this day, the White House released the first-ever U.S. National Strategy to Counter Antisemitism, a 60-page document with more than 100 calls to action for the executive branch of the U.S. government, and over another 100 actions for Congress, state and local government, and civil society.²

Why now? After all, the U.S. has a long, documented history of antisemitism; could a national response have come decades before?

Setting the Stage

At the time of the founding of the United States of America in 1776, there were approximately 2,000 Jews. Critically, the advancement of religious liberty for Jews following the Revolutionary War helped ensure that government-sponsored antisemitism would not take root in America as it had in Europe. The diversity of American demography also made theologically-based antisemitism not as much of an issue as it was in post-Reformation Europe. Indeed, Jews have generally thrived in America, enjoying religious freedom as well as widespread inclusion in American society.

By and large, antisemitic incidents in the U.S. were, at least initially, sporadic.³ In 1947, American Jewish Committee’s Harry Schneiderman, a Polish-born American-Jewish editor and executive, argued, “For over two and one-half centuries, from 1655, the year in which the first group of Jews arrived in New Amsterdam, to 1920, [sustained] antisemitism did not exist in the United States.” The anti-Jewish hostility that did exist, he argued, was “sporadic, overt manifestations.” There was “no agitation to deprive Jews of their rights as citizens; nor was there any attempt by any individual or group to use such anti-Jewish feeling to secure supporters for any political or economic movement. On the contrary, during this period the trend of public opinion was unmistakably liberal, and such manifestations of anti-Jewish feeling as did crop up

¹ This article is the unedited full-length text, completed in July 2024.

² “The U.S. National Strategy to Counter Antisemitism,” THE WHITE HOUSE (May 23, 2023), available at <https://www.whitehouse.gov/wp-content/uploads/2023/05/U.S.-National-Strategy-to-Counter-Antisemitism.pdf>

³ Some of these sporadic examples before World War I include, but are not limited to:

- The Maryland Constitution (1776) stated only Christians were allowed to hold state office in Maryland. It was not until the passage of the “Jew Bill” in 1826, which allowed Jews to hold public office in the state.
- During the Civil War, General Ulysses S. Grant ordered the expulsion of Jews from areas of Tennessee, Kentucky, and Mississippi under his control. After protests by American Jews, President Abraham Lincoln immediately rescinded this order, and Grant would later admit it was a mistake.
- The Saratoga Affair of 1877, where Joseph Seligman, one of America’s most prominent bankers, showed up at the Grand Union Hotel, in the resort town of Saratoga, and was turned away, because, as the manager supposedly told him, “Israelites” were no longer welcome. See *New York Times* “A Sensation at Saratoga” June 19, 1877, <https://jwa.org/media/sensation-at-saratoga>
- In 1913, Leo Frank, a Jewish factory manager, was accused of killing a 13-year-old Christian girl in Atlanta, GA. He was lynched after his death sentence was commuted.

from time to time were generally condemned. Although discrimination against Jews existed in business and in social life, Jew-baiting was decidedly not respectable in those days.”⁴

But Schneiderman noticed something changed by 1920. With mass immigration to the U.S. and the subsequent development of an anti-immigrant mindset, an increasing fear of communism, the publication of the *Protocols of the Elders of Zion* into English (and its ensuing mass distribution by Henry Ford), growing isolationism and nationalism, the rise of the Ku Klux Klan, and rising economic uncertainty of the Depression, Schneiderman observed, what he termed, “the transplanting of European antisemitism onto America.” He explained the “new themes introduced an element of fear of Jews as sinister conspirators or wielders of inordinate power. This innovation was an indication of the fact that Jews had become conspicuous in the economic life of the country, and that the success of some of them was beginning to arouse resentment, as if they were alien intruders who had no right to share in the country's prosperity.” It was this period starting after World War I until the mid-1930s where antisemitism in the U.S. seemed to develop a certain regularity. Yet when one looks at interventions during this period, Schneiderman lamented, “The Jewish community continued, as in the past, to deal with only the symptoms of existing anti-Jewish prejudice. Action was taken only when emergencies arose.”⁵

However, by the late 1930s, 1940s, and following World War II, the levels of sustained antisemitism demanded action. American Jews faced discrimination in employment, including law firms, housing, membership in certain social clubs and resorts, and acceptance to certain colleges and medical schools due to Jewish quotas. And various methods and interventions used to challenge antisemitism—from public debate, legislative advocacy, written articles, monitoring the activities of antisemites, and demonstrations—became more regular. Because of these efforts, especially after the reality of the Holocaust came to light, antisemitism—at least in polite society—was no longer acceptable.

The peak of these efforts, on display during the Civil Rights movement, would codify dozens of laws outlawing discrimination based on religion, race, color, sex, or national origin. To date, over 50 federal laws and dozens of state laws protect Jews in employment, education, housing, health, public services, and federal assistance. Legally, the same antisemitism and racism of the 1920s and 1930s was no longer an option. And despite the 1960s surfacing antisemitism from far left and radical and religious groups, including from the Black Power movement and the Nation of Islam which viewed American Jews as privileged “whites” oppressing people of color,⁶ by

⁴ Harry Schneiderman, “Anti-Jewish Prejudice and Agitation in the United States, 1655-1947,” AMERICAN JEWISH COMMITTEE ARCHIVES, (Jan. 1, 1947), available at <https://ajcarchives.org/Portal/Default/en-US/RecordView/Index/4780>. Schneiderman was not alone in arguing that antisemitism was sporadic; famed immigration historians Oscar Handlin and John Higham also noted antisemitism had limited significance. Others observed “Jewish exceptionalism in America,” arguing that there were “no organized anti-Jewish persecutions.” However, historians are currently reconsidering framing individual anti-Jewish episodes as “exceptional” before World War I; instead, they are moving to think about them as part of a longer history. David Sorkin, Professor of Jewish history at Yale University, for instance, argues that Jews did have an emancipation process—even with the laws on the books. Especially at the state level and local levels, Jews had to negotiate civil and political liberties. Britt Tevis, a historian of U.S. law, American Jewry, and antisemitism, also argues that historians might reconsider framing individual anti-Jewish episodes as “exceptional” and instead think about them as parts of a larger pattern.

⁵ *Ibid.*

⁶ One famous example of the growing divides between the Jewish and Black communities, especially in urban environments, is the New York City teachers’ strike of 1968 in the Ocean Hill-Brownsville neighborhoods in

and large, antisemitism in the U.S. declined by the 1970s through the 1990s. While the 1970s and 1980s did see a period of increased antisemitic violence,⁷ America, by this point, was much more tolerant, and fighting antisemitism was less of a primary focus for the Jewish community compared to previous decades.

Yet in the early 2000s, increasing levels of antisemitism were again witnessed following the UN World Conference against Racism in Durban, South Africa,⁸ the Second Intifada, and the advent of the Internet. Some called this “the new antisemitism,” in its anti-Israel forms, as Jews around the world were targeted as “agents of Israel.” In the same way individual Jews were viewed by antisemites as “evil,” now it was the Jewish collective or nation state that was labeled “evil.” The ramifications were first felt in Europe, especially Western Europe. Many of these violent and fatal attacks were motivated by extremist interpretations of Islam, as witnessed in Belgium, France, and Denmark during a short two-year span between 2014 and 2016.

The U.S. government and the American Jewish community watched this latest rise of antisemitism in Europe with great concern, not expecting within a few years it would surface in America in ways unfelt in decades.⁹ Fatal antisemitic attacks in recent years in Pittsburgh, Poway, Jersey City, and Monsey came from various sources on the ideological spectrum. An antisemitic stabbing in Boston, a hostage crisis in Colleyville, TX, and the celebrity mainstreaming of the problem by Kanye West¹⁰ also contributed to very high levels of concern for the American Jewish community. At this point in October and November 2022, data collected by American Jewish Committee revealed that 9 in 10 American Jews said antisemitism

Brooklyn. For more information see Wendell Pritchett, *BROWNSVILLE, BROOKLYN: BLACKS, JEWS, AND THE CHANGING FACE OF THE GHETTO* (Chicago: University of Chicago Press, 2002). In addition, after the Six Day War in Israel, these far left and radical and religious groups would also accuse Jews and Israelis of oppressing the Palestinians.

⁷ Examples include the Kneseth Israel synagogue shootings in St. Louis in 1977, the neo-Nazi march on Skokie in 1978, the murder of Alan Berg in Denver in 1984, and the murder of Neal Rosenblum in Pittsburgh in 1986. White supremacist actions during the 1980s farm crisis, especially in the Midwest, also became more sustained.

⁸ The late Congressman Thomas Lantos, the only Holocaust survivor ever to serve in the United States Congress, and who represented the U.S. at the UN World Conference Against Racism, witnessed the connection between hatred of Israel and antisemitism, and recalled how the Arab Lawyers Union distributed a booklet filled with antisemitic caricatures at a press conference. According to Lantos, the booklet “frighteningly [resembled] those seen in the Nazi hate literature printed in the 1930s... Having experienced the horrors of the Holocaust firsthand, this was the most sickening and unabashed display of hate for Jews I had seen since the Nazi period.” “World Conference Against Racism, Racial Discrimination, Xenophobia and Related Intolerance, 31 August-7 September 2001, Durban,” UNITED NATIONS, available at <https://www.un.org/en/conferences/racism/durban2001>

⁹ While no reason justifies antisemitism, there are several factors happening concurrently in the United States contributing to the current rise. A combination of rising economic uncertainty; growing distrust in government and democracy; polarization of American society, an increased emphasis on race and national identity; the fading legacy of the Holocaust is another reason, as many Americans, especially GenZ and younger do not know where unchecked antisemitism can lead; the Internet and social media and the proliferation of conspiracy theories combined with generative AI; and finally, increased sources of antisemitism, including anti-Israel antisemitism, from the far-left, the far-right, Islamist extremists, segments of minority populations, amongst others, amplified by the celebrity mainstreaming of the problem and societal ignorance, have all collectively contributed to this surge.

¹⁰ “5 of Kanye West’s Antisemitic Remarks, Explained,” AMERICAN JEWISH COMMITTEE (Sept. 27, 2023), available at <https://www.ajc.org/news/5-of-kanye-wests-antisemitic-remarks-explained>

was a problem in the U.S., 8 in 10 said it had increased in the last five years, and 41% said they felt the status of Jews in America was less secure than the previous year.¹¹

The U.S. is again, tragically, in a period of rising and sustained antisemitism. Yet the difference now compared to the 1930s and 40s, is not only 1) the huge body of laws on the books protecting Jews and 2) the collective and continuous calls for action from civil society (including, but not limited to, the American Jewish community) *and* the U.S. Government's receptivity and response, but 3) the availability of new tools to counter the problem.

These critical tools were developed over the last two decades to initially meet the urgent need of rising antisemitism in Europe. The first tool is a globally recognized working definition of antisemitism to help streamline data collection and to be used as an educational resource for law enforcement, government, and civil society.¹²

A second tool is the individual government coordinator appointed to combat antisemitism and foster Jewish life. The European Commission first appointed a coordinator tasked with this responsibility for the entire European Union in late 2015.¹³ Several European countries have appointed their own national coordinators to coordinate government response and action. In Germany, for instance, in addition to a federal-level coordinator, there are antisemitism coordinators for each of the country's 16 states. Globally, approximately 30 countries have appointed coordinators, many of whom are working with their governments to develop national action plans, or "whole-of-government" approaches, to fight antisemitism within their countries.

¹¹ "The State of Antisemitism in America 2022: AJC's Survey of American Jews," AMERICAN JEWISH COMMITTEE, available at <https://www.ajc.org/AntisemitismReport2022/AmericanJews>. This data changed drastically following the October 7, 2023 Hamas terrorist attacks and the spike in global antisemitism, including almost a 400% increase in the United States in the weeks following the attack.

¹² In the early 2000s, the European Monitoring Centre for Racism and Xenophobia (EUMC) indicated that its work to monitor antisemitism was "hampered by the lack of any common, comprehensive definition of antisemitism." (Rabbi Andrew Baker, "Presentation to the European Commission Working Group on Antisemitism," June 17, 2020.) By late 2004 and into early 2005, intensive discussions took place between the EUMC, representatives of the OSCE Office for Democratic Institutions and Human Rights (ODIHR), the European Commission against Racism and Intolerance (ECRI), American Jewish Committee (AJC), and European Jewish representatives to develop a definition: "The initial drafts relied on the advice of experts in the field with the goal of providing clear examples of antisemitism in its multiple forms. A consensus agreement was finally reached, and the EUMC issued its Working Definition of Antisemitism in March 2005... In 2007, the EUMC was replaced by the EU Agency for Fundamental Rights (FRA). In 2013, FRA's Director determined that defining antisemitism or any other form of intolerance was not in its mandate. By then, what was referred to as the EUMC Working Definition was being used by various governments and organizations, but with the FRA decision it had become an 'institutional orphan.'" (Baker, *Ibid.*) In May 2016, the International Holocaust Remembrance Alliance's (IHRA) Committee on Antisemitism and Holocaust Denial built international consensus around this non-legally binding working definition of antisemitism, with minor edits, and adopted it. The definition is known as the IHRA Working Definition of Antisemitism. (The International Holocaust Remembrance Alliance, "Working Definition of Antisemitism," INTERNATIONAL HOLOCAUST REMEMBRANCE ALLIANCE (IHRA), available at <https://holocaustremembrance.com/resources/working-definition-antisemitism>.) *Note: While the IHRA Working Definition of Antisemitism itself says it is "non-legally binding," there have been efforts—and some which have been successful—to enshrine it in law in the United States.*

¹³ The United States was the first country to have a "Special Envoy" tasked to globally monitor and combat antisemitism. This position was mandated by law in the 2004 Global Antisemitism Review Act, 118 Stat. § 1282. However, this position is internationally focused and housed in the U.S. Department of State. Therefore, the first appointments to look inward were in Europe. As of July 2024, the U.S. does not have a national coordinator to work domestically although pending legislation may change this.

A third tool is the country-specific national action plan or strategy to combat antisemitism. In 2016, Norway was the first country to publish a plan specific to countering antisemitism. In December 2018, the Council of the European Union published a pivotal mandate, calling on EU member states to adopt and implement a holistic strategy to prevent and fight all forms of antisemitism, endorse the non-legally binding International Holocaust Remembrance Alliance (IHRA) Working Definition of Antisemitism, and reinforce and finance the security and protection of Jewish communities, amongst other clear directives.¹⁴ Multiple European countries responded and published national strategies in subsequent years, with the European Commission announcing its own impressive ten-year plan in October 2021.¹⁵ To date, fourteen EU countries have published strategies.¹⁶

Following the European Model: The U.S. Responds

European Jewish communities and civil society organizations were intimately involved in advocacy at the highest levels of the European Union and in individual European countries' governments to ensure the adoption of these new tools. Civil society played a similar role in the announcement and subsequent development of a U.S. plan. Many Jewish organizations and community leaders urged the White House to publish a strategy focused solely on countering domestic antisemitism.¹⁷

On December 12, 2022, the White House announced the creation of an interagency group whose first task would be to develop a national strategy to counter antisemitism.¹⁸ The interagency group,

¹⁴ Outcome of Proceedings 15213/18 (Dec. 6, 2018), available at <https://data.consilium.europa.eu/doc/document/ST-15213-2018-INIT/en/pdf>

¹⁵ The first-ever EU strategy on combating antisemitism and fostering Jewish life (2021-2030) is an ambitious and comprehensive strategy adopted by the European Commission on October 5, 2021. The strategy includes three pillars: 1. Preventing and combating all forms of antisemitism; 2. Protecting and fostering Jewish life in the EU; and 3. Education, research and Holocaust remembrance. "Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions," EUROPEAN COMMISSION (Oct. 5, 2021), available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021DC0615>

¹⁶ A continuously updated list of national strategies in the EU can be found here: https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/combating-discrimination/racism-and-xenophobia/combating-antisemitism/eu-strategy-combating-antisemitism-and-fostering-jewish-life-2021-2030/national-strategies-combating-antisemitism_en

¹⁷ The author can speak directly to the involvement of American Jewish Committee (AJC). After recommending to White House staff to create a national action plan in November 2021, AJC issued its Call to Action Against Antisemitism in America in September 2022 and publicly requested the formation of an interagency task force charged with creating a national action plan to address antisemitism in America. AJC's Call to Action Against Antisemitism in America," AMERICAN JEWISH COMMITTEE, available at <https://www.ajc.org/call-to-action>; see also "AJC CEO Ted Deutch To Join in White House Roundtable on Antisemitism," AMERICAN JEWISH COMMITTEE (Dec. 5, 2022), available at <https://www.ajc.org/news/ajc-ceo-ted-deutch-to-join-in-white-house-roundtable-on-antisemitism>

¹⁸ White House Statement, "Statement from White House Press Secretary Karine Jean-Pierre on Inter-Agency Group to Counter Antisemitism," THE WHITE HOUSE (Dec. 12, 2022), available at <https://www.whitehouse.gov/briefing-room/statements-releases/2022/12/12/statement-from-white-house-press-secretary-karine-jean-pierre-on-inter-agency-group-to-counter-antisemitism/>. This interagency group will "better coordinate U.S. Government efforts to counter antisemitism, Islamophobia, and related forms of bias and discrimination within the United States." *Note:*

led by the White House’s Domestic Policy Council, National Security Council, and the Office of the Second Gentleman, included an Interagency Policy Committee (IPC) made up of members from multiple federal agencies of the U.S. government. The U.S. Department of State’s Office of the Special Envoy to Monitor and Combat Antisemitism played a critical role within this body, given best practices and insights the office obtained from antisemitism strategies published overseas. The next five months were a flurry of activity.

To develop the U.S. National Strategy to Counter Antisemitism, the interagency group held listening sessions with more than 1,000 Jewish, interfaith, and civil rights stakeholders.¹⁹ The group met with antisemitism special envoys from all over the world to learn best practices on strategy development and implementation.²⁰ They also engaged members of Congress and leaders across civil society and the private sector. According to the White House, “these listening sessions with stakeholders sought their perspectives, analysis, expertise, and views on how antisemitism manifests today and how we should fight it at every level, from the national scale to the grassroots. These discussions both provided critical insights into the experience of antisemitism in America and produced concrete ideas to counter it.”²¹

On May 25, 2023, the White House published the strategy. President Biden formally announced it, noting “it is the most ambitious and comprehensive U.S. government-led effort to fight antisemitism in American history.”²² U.S. Second Gentleman, Doug Emhoff; National Security Advisor, Ambassador Susan Rice; Homeland Security Advisor, Dr. Elizabeth Sherwood-Randall; and U.S. Special Envoy to Monitor and Combat Antisemitism, Ambassador Deborah Lipstadt joined the President, who made clear that antisemitism in America was “not simply wrong,” but is immoral, unacceptable, and “it’s on all of us to stop it.”²³

The Plan Itself

The U.S. National Strategy to Counter Antisemitism is a holistic and multi-tiered plan that integrates both responsive and preventative measures to address antisemitism and is one of the

While antisemitism and Islamophobia must be condemned and combated, there is a growing and unhelpful trend to link and name these two bigotries together. They are unique hatreds and should be addressed individually.

¹⁹ While these sessions were off the record, the White House sought responses to the following questions:

- “What are the barriers to addressing antisemitism in the U.S.?”
- “Are there promising practices in combating the problems you describe?”
- “What specific actions could the U.S. federal government take to counter antisemitism?”
- “What specific actions could be undertaken by other entities (e.g., state and local government, nongovernmental entities)?”

²⁰ In February 2022, AJC convened a meeting at the White House of antisemitism envoys from around the world, who shared best practices and lessons from drafting and implementing their own action plans to combat antisemitism. “International Antisemitism Envoys Join AJC-Convened White House Meeting as Part of U.S. Strategy to Fight Antisemitism,” AMERICAN JEWISH COMMITTEE (Feb. 28, 2023), available at

<https://www.ajc.org/news/international-antisemitism-envoys-join-ajc-convened-white-house-meeting-as-part-of-us-strategy>

²¹ *Supra* note 2, at 11.

²² *Id.*, at 2.

²³ Announcement, “Launch of U.S. National Strategy to Counter Antisemitism,” THE WHITE HOUSE (May 25, 2023), available at <https://www.youtube.com/watch?v=xPt8ZWreEjE>

most extensive antisemitism strategies globally to date. What makes the U.S. plan different from other similar plans abroad is not only its length, but its whole-of-society approach: countering antisemitism is everyone’s responsibility. The strategy explains that antisemitism “undermines our democracy and erodes trust in government, social institutions, and the basic values of our society. Antisemitism is not only a threat to Jewish Americans; it is a threat to all of us.”²⁴ While the strategy is the first U.S. government plan focused on a specific form of hate and bias, it is also meant to serve “as a blueprint for tackling other forms of bigotry, hate, and bias that fuel toxic divisions in America.”²⁵

The document is organized into four pillars, with each pillar having a set of strategic goals. Within the strategic goals, there are lists of actions for various federal agencies, as well as calls to action for Congress and all of society—state and local authorities, civil society, community and faith leaders, the private sector, and individual citizens, where appropriate. All the actions for the federal agencies have due dates between May 2023 and May 2024 or are ongoing. There are no specific due dates after May 2024, although this is subject to change as the plan is updated.

The four pillars are:

1. Increase awareness and understanding of antisemitism, including its threat to America, and broaden appreciation of Jewish American heritage
2. Improve safety and security for Jewish communities
3. Reverse the normalization of antisemitism and counter antisemitic discrimination
4. Build cross-community solidarity and collective action to counter hate

Within these four pillars, there are over 100 Executive Branch actions for approximately 30 federal agencies, meaning the strategy was not limited to agencies with a legal responsibility to protect American Jews, such as the FBI or the Department of Homeland Security (DHS). Many of the participating agencies’ actions were quite innovative.

For example:

- The U.S. Department of Agriculture (USDA) pledged to convene rural institutions of higher education and land-grant colleges to share best practices to address antisemitism and other forms of hate and bias.
- The Department of Health and Human Services (HHS) said they will provide resources on how to talk with children and youth about hate crimes and identity-based violence, including antisemitism, as well as strategies for coping with associated trauma and fear.
- The Institute of Museum of Library Services (IMLS) promised to increase learning opportunities in rural libraries and museums on both Jewish American history, such as Jewish contributions to agriculture, and histories of antisemitism, including the Holocaust.
- The Department of the Interior (DOI) said they will highlight new resources on Jewish American contributions to American history and disseminate the content through the

²⁴ *Supra* note 2, at 9.

²⁵ *Id.*, at 3. (The White House, as of this writing, plans to publish a stand-alone strategy on Islamophobia.)

National Park Service (NPS) website and mobile app and will integrate Jewish American history and histories of American antisemitism into planning for the United States Semiquincentennial commemoration in 2026.

- The Small Business Administration (SBA) committed to connect small business owners with community-based organizations so owners and employees can receive training and resources on preventing and responding to incidents of antisemitism.
- The Department of Veterans Affairs (VA) pledged to develop educational programs on the diversity of the veteran population, including the contributions of Jewish veterans and Jewish VA employees. The VA can share these programs with local veteran groups across the U.S. to “encourage all veterans to speak out against antisemitic and other hate-based incidents and attacks.”²⁶

The majority of American Jewish organizations welcomed and lauded the National Strategy, citing its historic importance.²⁷ Yet as critical as the plan’s publication was, its implementation would be the most consequential.²⁸

Implementation started immediately, with some agencies having deadlines already in May 2023. Successful implementation depended on each federal agency meeting its assigned deadlines. The Interagency Policy Committee (IPC) has regular check-ins for agencies to present updates and ensure implementation is on track. While the initial goal was for all federal agency actions to be completed by May 2024, the plan had to be flexible.

The brutal Hamas terrorist attack on October 7, 2023²⁹ demanded this flexibility and immediately became an unprecedented test for the National Strategy.³⁰ In the weeks following October 7, the deadliest day for Jews since the Holocaust, antisemitism in the U.S. increased

²⁶ *Ibid.*, at 18.

²⁷ Some Jewish organizations criticized the National Strategy for including the Nexus Definition along with the IHRA Working Definition of Antisemitism, as well as for too few mentions of Israel and/or anti-Israel antisemitism. Some, further to the right, were critical because it came from the Biden administration. On the other hand, some Jewish organizations on the left wanted definitions of antisemitism left out of the strategy altogether. *See* Gabby Deutch and Marc Rod, “In sweeping antisemitism strategy, White House calls mainstream IHRA definition ‘most prominent’ but ‘welcomes’ progressive alternative,” JEWISH INSIDER (May 25, 2023), available at <https://jewishinsider.com/2023/05/white-house-national-antisemitism-strategy/>

²⁸ As the plan is implemented at the federal level and across the U.S., it is important to understand Jewish and general public awareness of the plan and its actions. As of November 2023, only 17% of Jewish adults say they have heard a lot (2%) or some (15%) about the U.S. National Strategy to Counter Antisemitism. Eight in 10 (83%) say they have not heard much (27%) or have heard nothing at all (56%). The numbers are similar for U.S. adults. Just 12% of U.S. adults say they have heard a lot (1%) or some (10%) about the U.S. National Strategy to Counter Antisemitism, and nearly nine in ten (88%) say they have not heard much (33%) or have heard nothing at all (56%). “The State of Antisemitism in America 2023: Comparing American Jews and the General Public,” AMERICAN JEWISH COMMITTEE, available at <https://www.ajc.org/AntisemitismReport2023/Comparison>

²⁹ On October 7, 2023, 1,200 Israelis—men, women, and children—were murdered by Hamas terrorists. Hundreds of innocent civilians were taken hostage.

³⁰ Ironically, one silver lining was the infrastructure to quickly communicate about antisemitism after October 7 was already in place thanks to the development of the strategy over the previous months.

almost 400%.³¹ For the majority of American Jews, the terrorist attacks made them feel less safe as a Jewish person in the U.S.³² The strategy had to adjust and take the post-10/7 reality into account. Many deadlines were postponed. A major communications element after October 7 was added. Several agencies, like the Department of Education, not only opened more investigations into allegations of antisemitism, but they also increased communication and transparency with the public.³³ One of the biggest tests to successfully implement the legal and operational aspects of the National Strategy would be in a post-October 7 America.

Key Legal and Operational Aspects

It is important to first understand what the National Strategy can and cannot legally do. The strategy can (and does) reaffirm the constitutional rights of Jews—and all Americans—to practice their religion freely and safely.³⁴ It calls on federal agencies, consistent with civil rights laws prohibiting antisemitic discrimination, to increase resources and focus on antisemitism within their remit.³⁵ On the other hand, the strategy clearly states it cannot supersede, modify, or direct either an interpretation of any existing federal, state, or local statute, regulation, or policy or the requirements of the Federal, state, or local agencies that enforce them, including not restricting any rights otherwise protected by the First Amendment to the U.S. Constitution.³⁶ It must be implemented consistent with applicable law, subject to the availability of appropriations, and, because it does not constitute binding guidance for the public, states, localities, or federal agencies, the strategy cannot require compliance with the principles and actions it describes.³⁷

³¹ ADL Press Release, “ADL Records Dramatic Increase in U.S. Antisemitic Incidents Following Oct. 7 Hamas Massacre,” ANTI-DEFAMATION LEAGUE (Oct. 24, 2023), available at <https://www.adl.org/resources/press-release/adl-records-dramatic-increase-us-antisemitic-incidents-following-oct-7>

³² “The State of Antisemitism in America 2023: AJC’s Survey of American Jews,” AMERICAN JEWISH COMMITTEE, available at <https://www.ajc.org/AntisemitismReport2023/AmericanJews>. (98% of American Jews heard at least something about the October 7 attacks in Israel, and 78% of this group felt less safe in America).

³³ Andrew Lapin, “Department of Education increases transparency around Title VI discrimination investigations post-Oct. 7,” JEWISH TELEGRAPHIC AGENCY (March 20, 2024), available at <https://www.jta.org/2024/03/20/united-states/department-of-education-increases-transparency-around-title-vi-discrimination-investigations-post-oct-7>. The Department of Education released additional guidance in May 2024, a boiling point for many campuses facing protests and encampments, with the American public mixed on the use of police force to respond. Press Release, “U.S. Department of Education’s Office for Civil Rights Reminds Schools of Their Legal Obligation to Address Discrimination Based on Shared Ancestry and Ethnic Characteristics,” UNITED STATES DEPARTMENT OF EDUCATION (May 7, 2024), available at <https://www.ed.gov/news/press-releases/us-department-educations-office-civil-rights-reminds-schools-their-legal-obligation-address-discrimination-based-shared-ancestry-and-ethnic-characteristics>

³⁴ *Supra* note 2, at 10 (“Now, again, we must recall our historic national obligation to ensure people of all faiths and traditions are free to practice their faith and live their cultural identities without fear of persecution”).

³⁵ *Id.*, at 54-55.

³⁶ The First Amendment states “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.”

³⁷ *Supra* note 2, at 4. The disclaimer also notes, “Nothing in this strategy shall be construed to impair or otherwise affect or influence the authority of the Department of Justice, including the Federal Bureau of Investigation, in the performance of their responsibilities” and “The strategy is not intended to, and does not, create any legal right, benefit, or defense, substantive or procedural, enforceable by law or in equity by any party against the United States,

Working within these parameters, the National Strategy *does* provide a framework for enforcing laws, supporting victims, and implementing operational measures.³⁸ These legal and operational efforts include, but are not limited to, the following eight categories:

- 1. First, the U.S. National Strategy strengthens the enforcement of existing laws, including hate crimes legislation and civil rights violations.** It calls on the judicial system and law enforcement to ensure robust prosecution of antisemitic hate crimes under federal, state, and local laws.³⁹ The strategy also reminds federal agencies of their duties to apply U.S. civil rights laws and investigate complaints alleging discrimination to protect individuals in federally funded programs and institutions.

Thankfully, one week before the October 7 terrorist attacks, on September 28, 2023, eight federal agencies clarified—for the first time in writing—that Title VI of the Civil Rights Act of 1964 “prohibits certain forms of antisemitic, Islamophobic, and related forms of discrimination in federally funded programs and activities. These wide-ranging protections provide important tools to curb discrimination based on shared ancestry or ethnic characteristics and to better protect the civil rights of all Americans.”⁴⁰ Two weeks after the October 7 attacks, the Department of Education’s Office for Civil Rights (OCR) updated their complaint form to make it easier to report antisemitic and other bias incidents in school and on campus, and in May 2024, OCR released a new “Dear Colleague Letter” offering concrete examples of unlawful discrimination under Title VI of the Civil Rights Act of 1964.⁴¹ However, the hard issues caught between freedom of

its departments, agencies, or entities, its officers, employees, or agents, or any other person, nor does it constitute a waiver of sovereign immunity.”

³⁸ Civil society organizations are working in partnership with many federal agencies to operationalize the National Strategy. *See generally* “AJC’s Guides for America on Countering Antisemitism,” AMERICAN JEWISH COMMITTEE, available at <https://www.ajc.org/guides>

³⁹ Compared to some European Jewish communities, for instance, American Jews are more willing to use federal laws to file complaints. Nevertheless, there remains a reluctance of Jews to come forward and file either civil or criminal complaints. For example, only 21% of American Jews who were personally targeted by antisemitism in 2023 reported the incident; 79% did not report. *Supra* note 32.

⁴⁰ White House Press Release, “Fact Sheet: Biden-Harris Administration Takes Landmark Step to Counter Antisemitism,” THE WHITE HOUSE (Sept. 28, 2023), available at <https://www.whitehouse.gov/briefing-room/statements-releases/2023/09/28/fact-sheet-biden-harris-administration-takes-landmark-step-to-counter-antisemitism/>; *see also Supra* note 2, at 55. The Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, religion, sex or national origin. Title VI of the Civil Rights Act prohibits discrimination specifically in programs or activities receiving federal financial assistance. These protections have been interpreted to extend to individuals who have experienced discrimination, including harassment, based on their actual or perceived (i) shared ancestry or ethnic characteristics, or (ii) citizenship or residency in a country with a dominant religion or distinct religious identity. Thus, Title VI prohibits discrimination based on race, color, or national origin against individuals of any religion, such as those who are Jewish, Christian, Muslim, Sikh, Hindu, or Buddhist, where the discrimination involves, for example: racial, ethnic, or ancestral slurs or stereotypes; how a student looks, including skin color, physical features, or style of dress that reflects both ethnic and religious traditions; and a foreign accent, a foreign name, or speaking a foreign language. The Office of Civil Rights within the U.S. Department of Education also refers complaints of discrimination based exclusively on religion to the U.S. Department of Justice, which has jurisdiction to respond to certain complaints of religious discrimination in public schools.

⁴¹ “Discrimination Complaint Form,” UNITED STATES DEPARTMENT OF EDUCATION, available at <https://www2.ed.gov/about/offices/list/ocr/complaintform.pdf>; *see also* “Dear Colleague Letter: Protecting Students from Discrimination, such as Harassment, Based on Race, Color, or National Origin, Including Shared Ancestry or

speech and the civil rights laws have yet to be adjudicated, and processing a complaint can take well over two to three years—often after the students have left the campus.⁴² Greater urgency and increased resources are necessary, especially knowing that 24% of current or recent Jewish college students have felt uncomfortable or unsafe at a campus event in 2023 because they are Jewish and one in five (20%) reported feeling or being excluded from a group or event because they are Jewish—an eight percentage point increase in one year (up from 12% in 2022).⁴³

In addition, the strategy reminds employers and employees of Title VII of the Civil Rights Act of 1964 which prohibits employment discrimination on the basis of race, color, religion, sex, and national origin by employers with fifteen or more employees.⁴⁴ For American Jewish adults who are employed full-time or part-time, and not self-employed, 15% have avoided wearing or displaying something that would identify them as Jewish because of fears of antisemitism and 13% have felt uncomfortable or unsafe at work because of their Jewish identity in the last year.⁴⁵ Other federal civil rights laws referenced include the Fair Housing Act (1986), the Equal Credit Opportunity Act (1974), and the Religious Land Use and Institutionalized Persons Act (2000), amongst others.⁴⁶

- 2. Second, the strategy works to improve the safety and security of the American Jewish community.** The strategy calls on government and law enforcement agencies to develop accessible and reliable reporting mechanisms for individuals and organizations to report antisemitic acts and to provide better analysis on antisemitic incidents. It also seeks the expansion of funding for security enhancements at Jewish institutions through federal grant programs, the provision of specialized training to local law enforcement on identifying and responding to antisemitic crimes, and advance community preparedness programs and partnerships with local authorities.

Ethnic Characteristics,” UNITED STATES DEPARTMENT OF EDUCATION (May 7, 2024), available at <http://t1.info.ed.gov/r/?id=h957216,bdabfe,bdb99c>

⁴²One example is the phrase “From the River to the Sea, Palestine will be Free.” Many will argue that this phrase is free speech in support of Palestinians, while others will say its repeated use, especially after October 7, has created a harassing environment for Jews and Israelis who view the phrase as calling for the elimination of the Jewish state.

⁴³ *Supra* note 32. After October 7, only 46 percent of Jewish students felt physically safe on campus compared to 67 percent who said they felt physically safe before October 7. “Campus Antisemitism: A Study of Campus Climate Before and After the Hamas Terrorist Attacks,” ANTI-DEFAMATION LEAGUE (Nov. 29, 2023), available at <https://www.adl.org/resources/report/campus-antisemitism-study-campus-climate-and-after-hamas-terrorist-attacks/>

⁴⁴ Title VII of Civil Rights Act of 1964, 42 U.S.C. § 2000. (The prohibition on religious discrimination requires employers to provide reasonable accommodation of workers’ religious practices, unless doing so would place an undue hardship on the business.) *Supra* note 2, at 56.

⁴⁵ *Supra* note 32.

⁴⁶ “The Fair Housing Act prohibits discrimination because of race, color, religion, or national origin, among other grounds, in the sale, rental, advertising, or financing of housing. The Equal Credit Opportunity Act prohibits discrimination in the extension of credit based on a person’s race, color, religion, national origin, sex, marital status, or age, among other grounds. The Religious Land Use and Institutionalized Persons Act (RLUIPA) protects individuals, houses of worship, and other religious institutions from discriminatory or unduly burdensome zoning and other land use laws. This law also protects the right to free exercise of religion for institutionalized persons.” *Supra* note 2, at 55.

3. **Third, the strategy focuses on victim support, including legal support for victims of antisemitic incidents.** One in four American Jews (25%) were personally targeted by antisemitism in 2023.⁴⁷ The strategy points to various services, including mental health services through the Department of Health and Human Services (HHS), to help victims recover from trauma, connect with expanding support networks, and, if interested, seek education and reconciliation with perpetrators in lieu of punitive options.
4. **Fourth, the strategy demands better data collection.** It rightly notes the U.S. cannot effectively counter antisemitism if we do not have proper data. Currently, local law enforcement agencies voluntarily report hate crimes, including antisemitic hate crimes, to the FBI and there are many gaps in reporting. Yet the vast majority of Americans believe it is important that law enforcement be required to report hate crimes to a federal government database. 93% of American Jews and 91% of U.S. adults agree that it is very or somewhat important for law enforcement to have to report hate crimes to a federal government database.⁴⁸
5. **Fifth, the strategy lays out ways to increase awareness and understanding of antisemitism for American society.** Recommended actions consist of public education and awareness campaigns; curriculum development, including integrating antisemitism awareness and anti-bias education into school curricula and professional training programs for the workplace; and academic research on antisemitism to inform policy and practice. The strategy also reminds media outlets of their responsibility to use their reach to raise awareness while utilizing factual information about Jewish people, antisemitism, and the Holocaust. It calls on influencers, including media figures, athletes, gamers, entertainers, and other public figures to use their platforms to increase awareness about antisemitism “as they do with other social issues.”⁴⁹
6. **Sixth, the strategy works to counter antisemitism online and on social media.** The majority of American Jews (62%) have experienced antisemitism online or on social media in the last year, and online and on social media is where most U.S. adults see antisemitism.⁵⁰ Even within the confines of Section 230 of the 1996 Communications Decency Act which states “no provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider,”⁵¹ the strategy calls on Congress to implement regulatory measures to hold online platforms accountable for antisemitic content. In the absence of substantive regulation, the strategy asks technology companies to stop recommending and de-rank antisemitic and other hateful content, enforce terms of service against antisemitic content by investing in the human and technical resources, and ensure their users have credible information about Jews, antisemitism, and the Holocaust. Nine in ten (89%) American

⁴⁷ *Supra* note 32.

⁴⁸ *Supra* note 28.

⁴⁹ *Supra* note 2, at 20.

⁵⁰ *Supra* note 32. In addition, four in ten U.S. adults witnessed antisemitism in 2023, and for 68% of them, they saw it online or on social media. “The State of Antisemitism in America 2023: AJC’s Survey of the General Public,” AMERICAN JEWISH COMMITTEE, available at <https://www.ajc.org/AntisemitismReport2023/GeneralPublic>

⁵¹ This phrase shields companies from being sued by anyone who feels wronged by something someone else has posted. 47 U.S. Code § 230 (“Protection for private blocking and screening of offensive material”).

Jews say it is important for social media companies to explicitly cover antisemitism in the platforms' terms of service and community standards. Nine in ten (90%) also say it is important to make it easy to specifically report antisemitism.⁵²

7. **Seventh, the strategy focuses on collaboration and coalition building to successfully counter antisemitism.** Collaborative efforts both *within* the federal government and *between* the federal government and state/local governments, international allies, the private sector, and local communities will more quickly and effectively execute the strategy.

Improving collaboration within the federal government is underway through the aforementioned interagency group tasked to coordinate federal efforts and integrate policy against antisemitism; regular information sharing; specific responsibilities assigned to federal departments; and executive oversight, where the Domestic Policy Council and National Security Council oversee the implementation of the strategy.

Yet because the reach of the National Strategy can only go so far, there must also be collaboration with state and local governments. This is especially true for education, which is mainly a state and local responsibility in the U.S.⁵³ Critically, given the absence of Jewish narratives and even anti-Jewish bias within some critical ethnic studies plans, the strategy specifically calls on local and state governments to “to include Jewish studies in ethnic studies and history curricula.”⁵⁴ 77% of American Jews and 72% of U.S. adults agree this is important.⁵⁵ In January 2024, the White House met with state officials to learn about their progress in implementing the national strategy, urging them to continue to formally adopt steps detailed in the strategy, including strengthening education on antisemitism, Jewish history, and the Holocaust.⁵⁶ The officials were also encouraged to

⁵² *Supra* note 32.

⁵³ Before the U.S. Department of Education began operating in 1980, Congress clarified that the Secretary of Education and department officials would be prohibited from imposing “any direction, supervision, or control over the curriculum program of instruction, administration, or personnel of any educational institution, school, or school system.” 20 U.S.C § 3403.

⁵⁴ *Supra* note 2, at 17.

⁵⁵ *Supra* note 28. There is overwhelming consensus amongst Americans (both Jews and the general population) on the below educational measures proposed in the national strategy. The majority think it is important for:

- Public schools to invest more resources in teaching age-appropriate lessons about the Holocaust for all students (91% for American Jews and 85% for U.S. adults)
- Statewide studies to be conducted to assess how effectively public-school districts are teaching the Holocaust (87% for American Jews and 81% for U.S. adults)
- State and local governments to include contemporary antisemitism in public school curricula (86% for American Jews and 75% for U.S. adults)
- State and local governments to include Jewish studies within the ethnic studies or history curricula in public schools (77% for American Jews and 72% for U.S. adults)

See also Catherine Gewertz, “Ethnic Studies Curriculum Deemed ‘Anti-Jewish’,” EDUCATION WEEK (Aug. 27, 2019), available at <https://www.edweek.org/policy-politics/ethnic-studies-curriculum-deemed-anti-jewish/2019/08>

⁵⁶ State officials from Colorado, Connecticut, Illinois, Kentucky, New Jersey, New York, Ohio, and Oklahoma were present. Ben Samuels, “White House Pushes States to Take Action on Antisemitism Amid Rising anti-Jewish Hatred,” HA’ARETZ (Jan. 14, 2024), available at <https://www.haaretz.com/us-news/2024-01-14/ty-article/premium/white-house-pushes-states-to-take-action-on-antisemitism-amid-rising-anti-jewish-hatred/0000018d-0902-daa5-a7cf-df62373c0000>

“clarify a point person on countering antisemitism within each of their respective governments, strengthen social services to support hate-crime survivors, and formally commemorate International Holocaust Remembrance Day [in January] and Jewish American Heritage Month in May.”⁵⁷ A state-specific plan published in California in April 2024, echoed this call.⁵⁸

In addition to state and local governments, the strategy strongly recommends collaboration with allied foreign governments to exchange best practices to counter antisemitism and support and promote international legal standards and frameworks against antisemitism.

The strategy also focuses on private sector collaboration, emphasizing the role of corporate responsibility. It calls on all employers to review their diversity, equity, inclusion, and accessibility (DEIA) programs to ensure full inclusion of antisemitism awareness and training, in addition to workplace religious accommodation; support Jewish employees by promoting employee resource groups; speak out loudly and clearly when antisemitism occurs; and guarantee their policies and practices on discrimination and harassment are clear and enforced.

Importantly, much of the strategy’s “whole-of-society” approach depends on local community collaboration and action. The strategy specifies ways to foster collaboration between Jewish and other community groups to promote dialogue, strengthen trust, address common challenges, promote inclusivity, and recognize and celebrate contributions from individuals and groups working to combat antisemitism and promote solidarity. The vast majority of American Jews (94%) and U.S. adults (92%) say it is important for Jewish communities and other religious and ethnic communities to increase cooperation with each other. In fact, U.S. adults who personally know someone who is Jewish are more likely than those without a personal connection to say increased cooperation is very important (68% versus 53%). They are also more likely to know what antisemitism means (82% versus 48%), say antisemitism is a problem in the U.S. (79% versus 64%), and say it has increased over the past five years (62% versus 44%).⁵⁹ These cross-community relationships and partnerships to prevent antisemitism are imperative.

- 8. Eighth, the strategy describes the necessity of resource allocation and sustainability of actions.** It calls on Congress to fully fund the President’s budgets requests, including for the Department of Education, Department of Justice, and Department of Homeland Security, amongst others. Increased resources will help accelerate the time it takes to process complaints of antisemitic discrimination and ensure antisemitism is prosecuted with greater consistency and to the fullest extent of the law. The strategy also calls on Congress to pass new laws (such as giving the Department of Justice enhanced tools to address the bias-motivated violence or requiring social media companies to enable timely

⁵⁷ *Ibid.* As of 2023, only 28% of U.S. adults (and 24% of American Jews) have heard at least something about Jewish American Heritage Month. *Supra* note 28.

⁵⁸ “Golden State Plan to Counter Antisemitism,” GOV.CA.GOV (April 2024), available at <https://www.gov.ca.gov/wp-content/uploads/2024/04/Golden-State-Plan-to-Counter-Antisemitism.pdf>

⁵⁹ *Supra* note 50.

and robust public interest research) and reform current laws, such as Section 230 of the Communications Decency Act to remove special immunity for online platforms.

A Path Forward

Despite these best efforts, sustainability of the U.S. National Strategy to Counter Antisemitism is not yet guaranteed. As of July 2024, while the White House *is* updating the strategy to include new and continued actions for the federal government, what happens after the 2024 U.S. presidential election is uncertain. The strategy must not be tied to one administration: ensuring the continuity of the strategy and associated initiatives beyond the first Biden Administration is imperative for lasting impact.

Congress is the most important entity to make sure the strategy's implementation is an ongoing, multi-year, whole-of-government effort with proper funding. Currently, the best legislative attempt to institutionalize the strategy is the Countering Antisemitism Act (CAA), which calls for the establishment of a National Coordinator to Counter Antisemitism. This coordinator will serve as the principal advisor to the President on countering domestic antisemitism, coordinate federal efforts, and conduct a biennial review of the implementation of federal government strategies to counter antisemitism for a period of ten years. The legislation would also create a permanent Interagency Task Force to Counter Antisemitism that will include representatives from the relevant agencies, create and implement interagency procedures for collecting and organizing data, brief Congress, and evaluate progress on both education about antisemitism and protection and assistance to individuals and communities targeted by antisemitism. It would also mandate the submission of a report to Congress with detailed descriptions of any programs, activities, or policies established to carry out the strategy by federal agency, identification of the obstacles to implementation, and opportunities for improved coordination.⁶⁰ The majority of American Jewish organizations are advocating for the passage of this legislation to ensure the sustainability of government action against antisemitism.⁶¹

Yet obstacles remain. One pervasive obstacle is that antisemitism is a symptom of a much deeper societal issue. Antisemitism feeds on loneliness and distrust. In recent decades, the U.S. has become a more lonely, low-trust society. Americans are spending much more time alone (and online). In a 2018 study, 54% of Americans reported “they always/sometimes feel as though no one knows them well,” and a 2021 report found the percentage of Americans who said they have no close friends quadrupled between 1990 and 2020.⁶² Two generations ago, roughly 60% of

⁶⁰ “S.4091 – Countering Antisemitism Act,” Introduced by Senator Jacky Rosen (April 9, 2024), available at <https://www.congress.gov/bill/118th-congress/senate-bill/4091/text>

⁶¹ Marc Rod, “Across political and religious spectrum, 61 Jewish groups urge House to take up antisemitism bill,” JEWISH INSIDER (May 22, 2024), available at <https://jewishinsider.com/2024/05/jewish-groups-house-bipartisan-countering-antisemitism-act/>

⁶² Chris Jackson and Negar Ballard, “Over Half of Americans Report Feeling Like No One Knows Them Well,” IPSOS (May 1, 2018), available at <https://www.ipsos.com/en-us/news-polls/us-loneliness-index-report>; see also Daniel Cox, “The State of American Friendship: Change, Challenges, and Loss,” AMERICAN ENTERPRISE INSTITUTE (June 8, 2021), available at <https://www.aei.org/research-products/report/the-state-of-american-friendship-change-challenges-and-loss/>

Americans said most people can be trusted. By 2014, only 30% did, and only 19% of millennials according to Pew.⁶³ Low-trust societies break down.

To lower levels of antisemitism and hate, and restrengthen our democratic social fabric, Americans must relearn trust. Fortunately, 92% of U.S. adults say antisemitism affects society as a whole and everyone is responsible for combating it.⁶⁴ The U.S. National Strategy echoes this sentiment, closing with the reminder that “our country’s culture of pluralism is one of our most cherished assets. We were founded on the idea that our whole is stronger than the sum of our parts... This strategy represents a detailed plan to counter antisemitism in America as well as a foundation to tackle other forms of hate in our society, and to protect our greatest strength: our democracy.”⁶⁵

Holly Huffnagle serves as the U.S. Director for Combating Antisemitism at American Jewish Committee (AJC), spearheading the agency’s response to antisemitism in the United States and its efforts to better protect the Jewish community. On behalf of AJC, she participated in the White House’s civil society listening sessions to help develop the U.S. National Strategy to Counter Antisemitism in 2023.

Previously, Huffnagle served as the policy advisor to the Special Envoy to Monitor and Combat Antisemitism at the U.S. Department of State and as a researcher in the Mandel Center of Advanced Holocaust Studies at the U.S. Holocaust Memorial Museum in Washington, D.C. She received her master’s degree from Georgetown University where she focused on 20th century Polish history and Jewish-Muslim relations before, during, and after the Holocaust. She was a Scholar-in-Residence at Oxford University with the Institute for the Study of Global Antisemitism and Policy and has appeared in media outlets ranging from CNN, NBC, Fox and ABC, and has published articles in Times of Israel, Fox News, and other U.S. publications.

⁶³ “Millennials in Adulthood,” PEW RESEARCH CENTER (March 7, 2014), available at <https://www.pewresearch.org/social-trends/2014/03/07/millennials-in-adulthood/>

⁶⁴ *Supra* note 50.

⁶⁵ *Supra* note 2, at 53.