



U.S. Department of Justice
Community Relations Service

Washington, DC 20530

DATE: July 3, 2025

TO: ~~Vance Day, Senior Counsel, Office of the Deputy Attorney General~~

FROM: ~~Denise W. Nazaire, Supervisory Program Manager, Community Relations Service~~

Implementation Considerations for the Department’s Proposed Agency RIF and Reorganization Plan for the Community Relations Service

As directed by the Office of the Deputy Attorney General, ~~this memo offers implementation considerations e-Community Relations Service (“CRS”) offers its feedback for on how~~ the U.S. Department of Justice’s (“the Department”) ~~can implement its~~ proposed plan to eliminate ~~the Community Relations Service (“CRS”)~~ as a stand-alone component and ~~transfer sfer one of~~ CRS’s ~~56 employees and~~ statutory functions to the Executive Office for United States Attorneys (“EOUSA”) as part of the ~~implementation of the~~ Guidance on Agency RIF and Reorganization Plans (“ARRP Guidance”) issued by the Office of Management and Budget (“OMB”) and the Office of Personnel Management (“OPM”) to effectuate President Trump’s Executive Order *Implementing The President’s “Department of Government Efficiency” Workforce Optimization Initiative* (“Executive Order”).

I. Current Fulfillment of Statutory Functions

To sum up CRS’s key statutory mandates, the Civil Rights Act of 1964 (“CRA”) requires that CRS offer conciliation services where “peaceful relations” are threatened by disputes, disagreements, or difficulties relating to discriminatory practices. CRA also requires that CRS submit an annual report of CRS activities to ~~Ce~~ongress. The Fair Housing Act (“FHA”) requires CRS and ~~the Department of~~ Housing and Urban Development (“HUD”) work together to prevent and eliminate discriminatory housing practices. The Church Arson Prevention Act (“CAPA”) mandates that CRS “prevent and respond to” alleged violations of 18 U.S.C. §§ 247 and 844, and the Hate Crimes Prevention Act (“HCPA”) gives CRS the same prevention and response mandate as to 18 U.S.C. § 249. The Emmett Till Act requires CRS to bring law enforcement and communities together to address tensions related to unsolved civil rights ~~era~~ homicides.¹

As defined by CRA and the subsequent jurisdictional mandates noted above, CRS’s conciliation services refer to voluntary, confidential, and impartial assistance provided to communities experiencing tension or conflict. These services are designed to help prevent, resolve, and reduce

¹For more information about CRS’s current structure, jurisdictions, and fulfillment of statutory functions, please see Appendix A.

Commented [NJ1]: Given that this is your personal recommendation/analysis and not CRS's, it would be appropriate to remove references to this being a CRS document.

Commented [DN1R2]: These ideas were inherited from prior discussion with the leadership office and not my personal recommendations, albeit I have provided examples of how this particular plan may work. I view this as a CRS document, which I have been asked to author and submit.

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Commented [NJ3]: Given ODAG's ask that you provide a "plan" for a 1-person CRS, couching this as "feedback" may not be received well.

the potential ~~for violence, civil rights violations, and hate crimes in communities for violence and civil disorder~~. Broadly speaking, conciliation services may include:

- ~~Facilitated dialogues and mediation, —where CRS serves as a neutral third-party, facilitator to increase communication and information-sharing among communities in conflict~~
- ~~Stakeholder convenings to improve awareness of civil rights related issues and increase strengthen local peacemaking response to conflict and tension~~
- ~~Capacity-building and trainings for stakeholders (e.g., law enforcement agencies, religious groups, and other interest groups) to improve awareness of various other community groups and religious traditions (including lesser-known groups with particulate needs and interests) to either improve local response to conflict or improve community relations and decrease the likelihood of future tensions~~
- ~~Conflict assessment and consultation and technical assistance to prevent further violence, de-escalate and diffuse community tensions, and offer technical assistance to government authorities, law enforcement, and communities affected by the incidents in the development of responses to critical incidents and violence~~

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~~Here are three more detailed examples of how CRS currently fulfills the above jurisdictional mandates and statutory functions:~~

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Commented [NJ4R2]: Also, I think the annual report requirement should be described with some detail. My sense is that that requirement is what the current Leadership cares about the most.

Critical Incident Response

~~CRS responds to critical incidents (including high profile civil rights incidents, as prominently outlined in the Department’s “Protocol for Responding to High Profile Civil Rights Incidents”; see Appendix 1) to prevent further violence, de-escalate and diffuse community tensions, and offer assistance to government authorities, law enforcement, and communities affected by the incidents. As part of these services, CRS conducts facilitated dialogues among communities in conflict and, in coordination with law enforcement agencies, provides contingency training and event marshal training to groups, among other services.~~

Prevention of Violence, Civil Rights Violations, and Hate Crimes

~~CRS engages in significant work to prevent violence, civil rights violations, and hate crimes in communities. CRS achieves that goal through educational and training programs offered to stakeholders, including victim groups and various religious, civic, and community organizations. As part of this prevention work, CRS also conducts facilitated dialogues among communities in conflict and offers public safety consultation services to various institutions to support their capacity building for violence intervention and civil rights violations and hate crimes prevention.~~

Law Enforcement Support and Consultation

~~CRS provides training and consultation support to federal, state, tribal, and local law enforcement agencies to help officers better understand various community groups and religious traditions (including lesser-known groups with particulate needs and interests) and engage with those groups more safely and effectively in the administration of justice.~~

II. Implementation Approach for the Department’s Reorganization Plan for CRS

~~TCRS understands the Department’s proposed reorganization plan for CRS to consist of the elimination of the component CRS as a stand-alone component entity, and transfer CRS’s statutory functions to EOUSA, and designation of a single employee in to “EOUSA” to fulfill~~

CRS's day-to-day functions. Under that plan, the Director of EOUSA would serve as the Acting Director of EOUSA upon whom the responsibility of fulfilling CRS's statutory functions would rest. Should the Department move forward with a reduction to one this FTE plan, CRS suggests the following should be considered regarding (1) Transfer of Functions, (2) Conciliation and Casework, (3) Training and Program Development, (4) Stakeholder Engagement, and (5) Funding should be included in the implementation decisions approach.

Transfer of Function

Taking Under the Department's proposed transfer of function plan for CRS's statutory functions and one employee into EOUSA, CRS's one EOUSA would assume two core functions of CRS: (1) conciliation and (2) annual report to Congress. To implement this plan, one CRS employee could be reassigned as a one-person "CRS Unit" to EOUSA's Office of the Director and assume the position as of a national program manager of the CRS Unit ("NPM"). This NPM would report directly to the EOUSA Director, who would serve as the Acting Director of CRS, to continue to fulfill the day-to-day conciliation function of CRS as mandated by the CRA's and subsequent jurisdictional statutes and mandates for CRS reporting directly to the EOUSA Director. The NPM would acquire perform provide all the administrative oversight and coordination day to day coordination of CRS activities as well as carry out assist with CRS statutory functions: conciliation services and the fulfillment of the annual report function, as directed by the EOUSA Director, roles traditionally offered by CRS's Deputy Director, Associate Director, and Supervisory Program Manager for Training and Program Development. The NPM would also acquire perform the conciliation and stakeholder engagement roles traditionally offered by CRS's Regional Directors and Conciliation Specialists, though this would be significantly limited due to staffing. The annual congressional reporting requirement for CRS activities (as per CRA) could be transferred to the EOUSA Director who would be serving as the Acting Director of CRS, however the NPM could assist with drafting report content.

1. Conciliation Services

While housed in EOUSA, the NPM could reasonably provide some, though not all, of the conciliation services traditionally offered by CRS (see above *Current Fulfillment of Statutory Functions*). Specifically, the NPM could continue to deliver core services such as conciliation in select community conflict cases (particularly in situations where the need for federal involvement is clear and manageable), training and program development, and stakeholder engagement. (See below for *This memo a discussion on es the material changes that may be required to those services in the subsections that follow.*)

However, given the proposed reduction to a single employee, CRS would no longer be positioned to offer facilitated dialogues and mediation services. Facilitated dialogues and mediations typically require sustained engagement, intensive case management, and the flexibility to respond to evolving dynamics between parties. Those are conditions that would be difficult to maintain with only one employee for the entire nation. As a result, this aspect of CRS's conciliation services may need to be deprioritized or transitioned to external partners when appropriate.

Annual Report Completion

As noted above, the CRA requires the Director of CRS to submit an annual report to Congress detailing the agency's activities, outcomes, and overall impact. To fulfill this statutory obligation, the Department could designate the Office of the EOUSA Director,

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Commented [NJ6]: Given that the expected reader won't know what each position fulfills, these sentences may not say all that much. It's probably more effective to point to the last section and state which functions will transfer to EOUSA and be fulfilled by the 1 person.

I don't think anyone is thinking that all of CRS's functions will transfer. So it would be helpful to identify which functions absolutely must transfer.

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~~servicing as the Office of the Acting Director of CRS, thereby assigning them could be assigned to be responsible for the congressional reporting requirement. To support this function, the NPM could play a central role in collecting, managing, and analyzing data related to CRS service delivery. This could include tracking requests for service, documenting referrals and interventions, monitoring stakeholder engagement, and evaluating short- and long-term community outcomes. The NPM could compile this information into regular summaries that can inform both Department decision-making and the subsequent annual reports. This process would allow the Department to present a clear, evidence-based narrative to Congress that highlights CRS's contributions to violence prevention, conflict resolution, community capacity-building, and civil rights protection. Having taken these measures, the NPM could be able to reasonably address CRS's statutory functions while housed in EOUSA, albeit with several material changes to CRS's current structure and operations, as outlined below.~~

2.

Conciliation and Casework

~~With the proposed reduction to a single employee, CRS's conciliation efforts could center on serving as a strategic referral and coordination resource. The NPM could focus primarily on receiving, reviewing, and triaging requests for CRS assistance, determining the nature and urgency of each situation, and, when appropriate, connecting communities to qualified and carefully selected local or regional partners capable of providing conciliation services. This shift positions the NPM as a national hub, maintaining visibility into conflict trends while leveraging external capacity to meet community needs. The NPM could continue to respond directly to the most critical incidents, particularly those designated as priorities by the Attorney General or the Department, but would otherwise need to adopt a more selective, impact-driven approach to federal involvement. This includes prioritizing incidents based on severity, scope, and potential for broader harm, rather than attempting to monitor and engage every case within CRS's jurisdiction. To further advance CRS's mission under constrained staffing, the NPM could also lead efforts to institutionalize CRS services through capacity-building strategies discussed further below. Given the proposed reduction to a single FTE, the NPM would no longer have the capacity to respond to every incident within CRS's jurisdiction and would instead need to implement a standardized, strategic approach to service delivery. Rather than monitoring, assessing, and responding to every incident within CRS jurisdiction, the NPM would be required to prioritize federal involvement based on the severity and potential impact of the situation. The NPM would continue to respond to critical incidents, particularly those identified as priorities by Attorney General or the Department but would need to shift the broader focus toward institutionalizing CRS's services through capacity-building efforts. This would include the development and delivery of training programs, creation of scalable tools and resources, and sustained engagement with stakeholders to enable them to carry out conciliation functions independently (see *Training and Program Development*, and *Stakeholder Engagement* below for more detail). Additionally, the NPM would serve as a referral source, receiving and reviewing requests for CRS services, and when appropriate, connecting parties to trained local or regional partners capable of providing conciliation support.~~

By transitioning from a reactive to a proactive model, the NPM would maximize the impact of limited staffing while ensuring that CRS's core mandates continue to be advanced through strategic partnerships and local ownership of community conflict resolution.

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Commented [NJ9R2]: Also, consider bringing up the referral work as the primary conciliation work. Realistically, that may be all the 1 person can do.

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Training and Program Development

~~CRS's current training and program development efforts fulfill its conciliation function by equipping key stakeholders, such as law enforcement and community leaders, with the knowledge and tools to recognize and respond to sources of tension before they escalate. These CRS programs promote greater community awareness, foster mutual understanding across various communities, and help prevent conflict by addressing underlying issues that can lead to disputes. Given the proposed reduction to a single employee and limited capacity for casework, the NPM would need to bolster could advance CRS's conciliation efforts effectively by developing and implementing prioritizing a more standardization of ed approach to existing training and program materials and selectively upgrading them to meet the most pressing needsdevelopment. Given the proposed reduction to a single FTE and limited ability to engage in casework, the NPM would need to adopt and develop a more standard approach to training and program development.~~

In collaboration with EOUSA's Office of Legal Education, the NPM could spearhead the transition of existing and new CRS training offerings into a suite of virtual offerings through EOUSA's National Advocacy Center, the Bureau of Justice Assistance's National Training and Technical Assistance Center, or another Department training platforms. This ~~c~~would include both live webinars and on-demand, self-paced modules hosted on accessible, user-friendly training platforms. These offerings ~~c~~would be designed to reflect the core principles of CRS, including conciliation, critical incident response, de-escalation, and collaborative problem-solving.

Previous CRS efforts to convert training and program delivery to virtual platforms have demonstrated that this proposed shift is both feasible and effective. During the COVID-19 pandemic, CRS successfully transitioned all service delivery, including training requests, to virtual platforms such as Zoom and Webex. This pivot allowed CRS to continue meeting the needs of communities and partners nationwide despite physical distancing constraints. Additionally, CRS hosted live sessions of its *Engaging and Building Relationships* training programs on Adobe Connect, creating an interactive and engaging virtual environment for participants. These efforts provided valuable lessons in virtual facilitation and demonstrated CRS's ability to maintain training quality and participant engagement in a digital format, laying a strong foundation for expanding virtual offerings as part of a long-term strategic approach. ~~Alternatively~~In addition, in Fiscal Year 2023, through an intragovernmental reimbursable agreement, CRS provided funding to the Community Oriented Policing Services ("COPS") Office to develop and provide CRS specific, on-demand, and self-paced critical incident training for law enforcement (tentatively titled: *Critical Incident Insights: Effective Community Engagement*) through the COPS Training Portal. Although this training is still under development, it serves as a model for how CRS can collaborate within the Department to support the transition toward a more standardized and scalable approach to training and program development.

By converting key training programs into virtual formats, CRS can also meet the growing demand for flexibility and accessibility among its partners. Federal, state, local, and community stakeholders ~~c~~would have the ability to enroll in and complete relevant trainings programs at their own pace, before or even after any critical incidents. This approach allows partners to build foundational skills and preparedness in advance, rather than reacting under pressure during moments of tension or crisis.

Commented [NJ11]: One challenge will be to connect this work with CRS's core conciliation work. It would be helpful to connect the dots more explicitly from the beginning as to how this fulfills one of the transferred functions

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Furthermore, this shift ~~could~~ significantly reduce the burden on the NPM, allowing limited staff resources to be reserved for high-impact engagements, high-priority technical assistance, and complex conflict assessments that require direct CRS involvement or where local resources are limited. Virtual training libraries ~~could~~ be regularly updated with new content and informed by feedback from previous participants, ensuring that materials remain relevant, practical, and aligned with emerging challenges and trends in civil rights and community conflict resolution. Such regular assessment ~~could~~ allow CRS to evaluate the effectiveness of all training programs and course correct as needed.

Ultimately, a standardized approach ~~could~~ broaden CRS's national reach, improve continuity of service in areas with limited local conciliation services, and strengthen the agency's capacity-building mission by empowering partners to take ownership of their preparedness and response efforts.

Stakeholder Engagement

Given the reduction to a single ~~employee~~^{FTE}, the NPM would need to adopt a strategic approach to governmental and non-governmental stakeholder engagement. This ~~could~~ include conducting regular outreach and relationship-building efforts with key federal, state, and local partners, ~~—~~such as law enforcement agencies, community leaders, national civil rights organizations, and local government officials, ~~s, s~~—well before any critical incident arises. By engaging stakeholders early and consistently, the NPM could help ~~aims to~~ familiarize them with CRS, its mission, ~~the~~ principles of conciliation, and the services and trainings ~~it~~^{CRS} makes available to communities. Through training sessions, forums, and ~~workshops~~^{convenings}, the NPM ~~could~~ work to equip these partners with the skills and tools necessary to prevent, de-escalate, and resolve violence and community tensions; ~~—~~and thereby increase public safety. The overarching goal ~~is would be~~ to cultivate a network of trained, responsive stakeholders who are prepared to act collaboratively and constructively in the face of community conflict, thereby reducing the need for direct CRS intervention during critical incidents.

Commented [NJ13]: Love how you structured the subsections below.

1. United States Attorneys' Offices ("USAOs")

Working within the priorities set by the Administration and the Attorney General, as a part of the EOUSA, the NPM could continue to work closely with USAOs personnel to carry out ~~it's~~^{CRS's} conciliation work. First, the NPM ~~could~~ collaborate with the 93 USAOs to conduct a comprehensive assessment aimed at evaluating the extent to which CRS's statutory functions are being utilized and applied within their jurisdictions. This assessment would seek to ~~understand the legal interpretation promote and the~~ operational integration of CRS's mandate in relation to the USAOs, document successes and challenges from past engagements, and identify any gaps in services or unmet community needs. The findings ~~could~~ be compiled into a detailed report, which would include actionable recommendations for enhancing coordination between CRS and USAOs, strengthening the implementation of conciliation services, and aligning efforts with broader Department priorities. This report ~~could~~ be submitted to the Department to guide strategic planning, policy development, and future interagency collaboration of CRS functions.

Second, leveraging those recommendations, the NPM ~~could~~ work directly with USAOs and offer technical and planning assistance for their Community Outreach Coordinators, Law Enforcement Coordinators, and Victim Witness Specialists. Such technical assistance ~~could~~ allow the Department to continue CRS's work of organizing, convening, and facilitating hate

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crimes forums, protecting places of worship forums, protecting centers of community forums, dialogues around community conflicts, contingency and event marshal trainings, and other similar forums and programs both in response to incidents arising from violent conflicts and other jurisdictional issues and prevent future incidents.

The NPM could also offer conciliation training. For example, CRS could ~~modify-tailor~~ its current *New Conciliator Training* to ~~suit a the~~ USAO audience. This modified training ~~c~~would teach ~~staff~~ the principles of conciliation, ~~how to appropriate~~ responses to critical incidents with the goal of assessing community needs and impact ~~and addressing public safety concerns~~, facilitating communications between affected communities and law enforcement, coordinating with other DOJ components for provision of necessary services, ~~working-interacting in non-confrontational ways~~ with community groups protesting in relation to the critical incidents for safe and lawful First Amendment expressions, and de-escalating and resolving conflicts among community groups reacting to critical incidents. Such an action ~~c~~would allow for the USAOs to offer conciliation work directly in the communities they serve, with periodic support from the NPM.

2. Other Federal Partners

CRS recognizes that other federal agencies, such as the Federal Bureau of Investigation (“FBI”) or the Department of Homeland Security (“DHS”), may have designated personnel—~~such as e.g.~~, Community Outreach Coordinators and Victim Witness Specialists—who engage directly with local communities, particularly in times of crises. ~~Considering this,~~ The NPM ~~c~~would proactively seek to foster interagency collaboration with ~~those~~ counterparts ~~to~~, exploring opportunities for cross-component training and coordination ~~on violence prevention and conflict resolution~~. As part of this effort, CRS’s conciliation training could be designed for ~~both~~ USAO, ~~and~~ FBI, DHS, and other law enforcement personnel. By broadening access to these resources, CRS aims to enhance consistency in federal engagement with communities, ensure alignment in approach and messaging, and reduce duplication in training development across components. This coordinated strategy ~~c~~would not only promote a whole-of-government approach to addressing community conflict, but it ~~c~~would also improve overall efficiency, encourage shared learning, and support a more unified federal response to community conflict. It also reinforces CRS’s role as a trusted convener and resource within the Department, helping to bridge operational silos and promote collaborative, community-centered solutions across agencies.

3. State, Local, and Community Partners

Outreach ~~c~~would also focus on building strong relationships with state attorneys’ general offices, state human rights commissions, governors’ offices, and local elected officials. Through training, consultations, and scenario planning, the NPM ~~c~~would help these partners strengthen their capacity to identify early warning signs of tension, engage effectively with various constituencies, and de-escalate conflict using proven conciliation techniques. As requested by USAOs ~~and other agencies~~, the NPM could continue to offer ~~the~~ limited in-person training programs and consultation to various law enforcement agencies to promote stronger police-community relations.

Equally critical is sustained engagement with grassroots organizations, civil rights advocates, faith leaders, educators, youth groups, and other local stakeholders. Rather than just working

with regional and local chapters of civil rights organizations as CRS has done historically, when ever possible, the NPM could coordinate more closely with national chapters. By offering training in conciliation, conflict resolution, and collaborative problem-solving, CRS empowers the NPM could increase the capacity of these groups to take a more active role in maintaining peace and promoting dialogue within their communities. The intent is to cultivate a network of informed, skilled stakeholders who can serve as first responders in times of acute tension—reducing the need for intensive CRS intervention when crises occur.

Overall, this shift in stakeholder engagement could allow CRS to extend its impact, even with limited staff capacity, by investing in long-term partnerships and capacity-building at the local level.

Funding

Given the Department's proposed budget for FY2026 has does not request zero dollars allotted any funding for to CRS, the funding for the proposed one-person CRS Unit in EOUSA would need to come from EOUSA's budget. In order to effectively carry out its CRS's statutory functions with a single employee housed in EOUSA, the CRS Unit would require meaningful dedicated funding from the EOUSA budget. This financial support would to enable the Unit CRS to transition existing trainings and programs to virtual platforms, develop new program content, host stakeholder convenings and community forums, and support limited travel for critical casework. Funding would also cover the technical infrastructure and subject matter expertise needed to ensure these services are accessible, high-quality, and responsive to emerging tensions. Without this investment, CRS's ability to fulfill its statutory mandates in a meaningful and nationally relevant way will be significantly constrained.

One immediate source of funding to allow for a smooth transition from CRS to EOUSA would be to transfer the remaining funds in CRS's FY 2025 appropriations to EOUSA through a reimbursable agreement.

III. Potential Challenges to Implementation of the Department's Reorganization Plan for CRS

While CRS appreciates the opportunity to offer reflections and suggestions how the Department could implement it's plan to eliminate CRS as a stand-alone component, transfer statutory functions and reduce staffing to a single employee within the "EOUSA", it would be prudent to also present recognize a few notable challenges to this approach.

Time Required for Full Implementation

Successfully shifting from CRS's current structure and operations, which has been in place for more than 60 years, to this proposed plan will take time. Developing or revising training programs, establishing referral networks, building stakeholder capacity, and aligning interagency protocols are complex, multi-phase efforts. During this transition period, there may be temporary service gaps or confusion among partners about how to access CRS resources, which could impact the continuity and effectiveness of service delivery. Shifting to this model may also reduce CRS's visibility in the field. Communities may be less aware of CRS's role or assume the agency is no longer available for support, which could diminish long-standing relationships and reduce future engagement opportunities.

Funding and Resource Constraints

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Commented [NJ16]: I'm not sure this is needed. I think these all are understood points, but could sound like excuse-making or objecting to the plan itself even before implementation.

Commented [NJ17]: Consider reframing this to argue for a need to dedicate a certain portion of EOUSA budget to fulfill CRS functions. You may even suggest a specific amount - say \$1M - and explain what that money will go toward, while sticking to the 1-person structure as the given.

With this reframing, perhaps place this discussion on funding right after Transfer of Functions paragraph up above?

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Transitioning all of CRS's current training programs to virtual platforms, along with the development of future programmatic content, will require a substantial investment of resources and support from EOUSA and/or the Department. Creating high quality, interactive training modules that accurately reflect CRS's statutory functions demands not only significant staff time, but also the involvement of specialized subject matter experts. Given the Department's proposed budget for FY2026 has zero dollars allotted to CRS, funding limitations present a significant barrier to the successful implementation of this approach. Without dedicated financial support, CRS may face challenges in securing the expertise needed to design and deliver effective training content, as well as the technical infrastructure and support services necessary to maintain and scale these programs.

Reporting Requirement

As noted above, CRS is required to submit an annual congressional report on CRS activities. Such a shift in service delivery would require both a reframing of how conciliation services are delivered as well as an acknowledgement that as services become more distributed and indirect, tracking outcomes, gathering data on community impact, and evaluating the effectiveness of interventions will be more complex. This may hinder CRS's ability to demonstrate accountability and report on activities to the Department or Congress.

Commented [NJ18]: I do think how this requirement would be fulfilled should be a major part of this document, but perhaps some of the language here can go within the subsection on the reporting function?



U.S. Department of Justice
Community Relations Service

Washington, DC 20530

DATE: February 13, 2025
TO: Office of the Associate Attorney General
FROM: Julius Nam, Associate Director & Component Head, CRS
RE: CRS 2025: A Proposal for Renewed Peacemaking

“My proudest legacy will be that of a peacemaker and unifier. That’s what I want to be: a peacemaker and a unifier.” – President Donald J. Trump, Inaugural Address, Jan. 20, 2025

I. CRS’s Mission and Current Challenges

Known as “America’s Peacemaker” since its creation over 60 years ago, the Community Relations Service (CRS) has resolved disputes and restored peace in communities torn by violence and intense conflict. Since its establishment through Title X of the Civil Rights Act of 1964 (CRA), CRS has provided mediation and conciliation services where “peaceful relations among the citizens of the community involved” were threatened by “disputes, disagreements, or difficulties,” including some of the Nation’s most contentious civil rights conflicts.

In recent years, however, CRS has faced significant challenges and criticisms. President Trump’s FY 2020 and FY 2021 budget messages to Congress did not include requests for an appropriation for CRS. Instead, the budget requests proposed to “consolidate” CRS’s functions within the Civil Rights Division to “rightsizing the Federal role in local conflict resolutions, while eliminating duplicative functions and improving efficiency” by reducing CRS’s personnel to 15 employees.¹

The FY 2023 federal budget proposal published by the Center for Renewing America (which was led by Russ Vought, director of the Office of Management and Budget in the first Trump Administration and again in the current Administration) called for “full elimination of the ‘equity’ obsessed” and “woke and weaponized” CRS, which the Center viewed to be “driven by race essentialism and radical gender theory—hunting for ‘hate crimes’ defined through the prism of critical race theory and intersectional progressivism.” Asserting that CRS “serves only to perpetuate the continuing efforts of Washington to label citizens as ‘oppressors’ or ‘oppressed,’ . . . tearing apart the civil fabric necessary for a constitutional republic to survive,” the Center proposed “a total defunding” of CRS.²

¹ “A Budget for a Better America, Promises Kept, Taxpayers First, Fiscal Year 2020 Budget of the U.S. Government.” Appendix at 698. <https://www.govinfo.gov/content/pkg/BUDGET-2020-APP/pdf/BUDGET-2020-APP.pdf> (last accessed Feb. 12, 2025).

² Center for Renewing America, “A Commitment to End Woke and Weaponized Government: 2023 Budget Proposal,” at 10, 13. <https://americarenewing.com/wp-content/uploads/2024/03/Budget-Center-for-Renewing->

Similarly, the Republican Study Committee’s FY 2025 budget proposal called for the elimination of CRS because, according to the RSC, CRS “deviates from the core purpose of the DOJ to investigate and prosecute violations of federal law,” but “[i]nstead, the entity attempts to act as ‘peacemaker’ in local disputes and has been used by the Biden Administration to push its woke gender and CRT ideologies.”³ The House’s current marked-up text of the Commerce-Justice-Science (CJS) appropriations bill (which has not had a floor vote yet) has \$0 for CRS. On the other hand, the Senate’s marked-up CJS appropriations bill (which also has not had a floor vote yet) has \$25.0 million allotted for CRS.

In light of these recent calls for defunding and elimination of CRS, the Office of the Associate Attorney General directed me on February 7, 2025 to submit a memo that responds to the criticisms against CRS and identifies avenues of CRS’s contributions under the current Administration.

In response, I provide below an overview CRS’s jurisdictional statutes, a summary of CRS’s core activities, an analysis of the recent criticisms against CRS, and a proposal for CRS’s contributions toward the advancement of the Trump Administration’s peacemaking and public safety goals in the next four years and beyond. Also attached are appendices to this memo that describe CRS’s current structure and recent staffing and budget history, and an outline of approaches that the Department could take in light of the Administration’s current efforts to reduce the federal workforce.

II. Overview of CRS’s Jurisdictional Statutes

A. Civil Rights Act of 1964

As the Center for Renewing America correctly notes, CRS “was originally created in Title X of the Civil Rights Act of 1964 as an agency tasked with maintaining dialogue and ensuring a smooth transition out of the era of segregation.”⁴ Conceived to undertake and coordinate mediation and conciliation in explosive situations and tension-torn communities affected by alleged discrimination based on race, color or national origin in public accommodation and other settings, CRS was initially placed in the Commerce Department and was moved to the Justice Department in 1966 through Reorganization Plan of that year. As President Lyndon B. Johnson’s message regarding this reorganization stated, CRS, by being in “closer relationship with the Attorney General and the Civil Rights Division of the Department of Justice, will gain by becoming a primary resource in a coordinated effort in civil rights under the leadership of the Attorney General.”⁵

Under the CRA, the mission of CRS continues to be “to provide assistance to communities and persons therein in resolving disputes, disagreements, or difficulties relating to discriminatory practices based on race, color, or national origin” and restoring “peaceful

[America-FY23.pdf](#) (last accessed Feb. 12, 2025). Project 2025, on the other hand, does not contain a reference to CRS.

³ Republic Study Committee, “Fiscal Sanity to Save America: Republic Study Committee FY 2025 Budget Proposal,” at 148. https://hern.house.gov/uploadedfiles/final_budget_including_letter_web_version.pdf (last accessed Feb. 12, 2025).

⁴ “A Commitment to End Woke and Weaponized Government,” at 13.

⁵ 5 U.S.C. App., Reorganization Plan No. 1 of 1966, “Message of the President.”

relations among the citizens of the community involved.” To allow CRS to approach communities in conflict with impartiality and build trusting relationships, the CRA mandated that CRS conduct “conciliation assistance . . . in confidence and without publicity,” “hold confidential any information acquired in the regular performance of its duties,” and not “engage in the performance of investigative or prosecuting functions of any department or agency in any litigation arising out of a dispute” handled by CRS. Any CRS member who breaks the confidentiality mandate may be prosecuted for a misdemeanor offense under the CRA. 42 U.S.C. 2000g-1, 2000g-2.

In addition, the CRA conferred CRS a role in federal judicial proceedings. The act gave district courts authority to refer parties in CRA public accommodation cases to CRS for CRS to conduct voluntary settlement proceedings with the parties. 42 U.S.C. 2000a-3, 2000a-4.

CRS is also required under the CRA to submit an annual report due to Congress each January 31. 42 U.S.C. 2000g-3.

B. Fair Housing Act of 1968 (and Fair Housing Amendment Act of 1988)

The FHA, which was part of the Civil Rights Act of 1968, recognized CRS’s role in preventing and eliminating discriminatory housing practices, and directed the Secretary of Housing and Urban Development to assist CRS with this work. 42 U.S.C. 3608(e)(4).

C. Church Arson Prevention Act of 1996

The CAPA—which strengthened existing 18 U.S.C. 247 to provide for a more robust protection of religious properties and faith communities from intentional interference of their free exercise of religion and destructive conduct targeting religious properties—directed CRS to “prevent, and respond to potential violations” 18 U.S.C. 247 (damage to religious property and interference with free exercise of religion) and 844 (destructive conduct using fire, bombs, or other explosives). Pub. L. 104-155, Sec. 6.

D. Emmett Till Unsolved Civil Rights Crime Act of 2007 & Emmett Till Unsolved Civil Rights Crimes Reauthorization Act of 2016

The Till Act of 2007, as reauthorized in 2016, directed the Civil Rights Division to investigate civil rights era unsolved homicides, and mandated CRS to “provide technical assistance by bringing together law enforcement agencies and communities to address tensions raised by Civil Rights era crimes.” Pub. L. 114-325, Sec. 2.

E. Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009

Through the HCPA, Congress created new federal hate crimes in 18 U.S.C. 249 (bodily injury or attempted/threatened bodily injury based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability) and directed CRS to “prevent and respond to alleged violations” of Section 249.

III. CRS's Core Activities

Guided by the above five jurisdiction-conferring statutes, CRS responds to communities experiencing incidents of mass violence and other deeply divisive conflicts to restore peaceful relations. Working closely with federal, state, tribal, and local governments, law enforcement agencies, religious organizations, community groups, and educational institutions, CRS helps communities to resolve conflicts and disputes through mediation, facilitated dialogue, training, and consultation. CRS provides these services in a neutral and impartial manner only when the parties voluntarily accept CRS's services. As required by the CRA, CRS works under the mandates of confidentiality, non-publicity, and non-involvement in prosecution, litigation, investigation, or enforcement.

CRS's work in communities may fall into three major categories.

First, CRS responds to critical incidents (including high-profile civil rights incidents) to prevent further violence, de-escalate and diffuse community tensions, and offer assistance to government authorities, law enforcement, and communities affected by the incidents. As part of these services, CRS conducts formal mediation and facilitated dialogues among communities in conflict and, in coordination with law enforcement agencies, provides contingency training and event marshal training to groups, among other services.

Second, CRS engages in violence and hate crime prevention services through educational and training programs offered to stakeholders, including victim groups and various civic and community organizations. As part of this prevention work, CRS also conducts facilitated dialogues among communities in conflict and offers public safety consultation services to various institutions to support their capacity building for violence intervention and hate crimes prevention.

Third, CRS provides training and consultation support to federal, state, tribal, and local law enforcement agencies to help officers understand various community groups and religious traditions better and engage with them more effectively in the administration of justice.

IV. Analysis of Recent Criticisms and Challenges

As noted at the outset, the recent challenges to CRS coming with defunding and elimination calls have presented the concerns that CRS's functions are duplicative and inefficient and that CRS is driven by an unconstitutional "woke" ideology on race and sex. With respect, I submit that those characterizations are largely inaccurate, though I acknowledge that certain rebalancing, refocusing, and ameliorative actions may be necessary to better advance CRS's statutory mandates and President Trump's public safety priorities.

First, CRS's functions are not duplicative of any functions currently fulfilled by a Justice Department component. CRS is the sole federal entity that provides public safety mediation, consultation, dialogue facilitation, and training services to state, tribal, and local governments, law enforcement agencies, community groups, religious organizations, and educational institutions. Unlike the Civil Rights Division, U.S. Attorney's Offices, FBI, and other enforcement/investigative/litigating components, CRS is the only component that functions in a neutral and impartial manner to respond to and de-escalate violent and other volatile conflict situations. CRS may appear to fulfill duplicative community event organizing functions that are

also handled by community outreach personnel in CRT, USAOs, and other components. But CRS's community events are methodically designed to address, prevent, and de-escalate actual conflicts in the communities and are tightly connected with CRS's strategic goal of providing mediation and conflict resolution services as a neutral and impartial entity. This is an entirely unique function that CRS performs within the Department in fulfillment of its significant public safety mandates.

Second, CRS is neither a "woke" nor "weaponized" agency that is obsessed with concerns for equity, critical race theory, or gender ideology. CRS does not have either a formal or an informal ideological or political strategy that would be defined as "woke" or unhealthily preoccupied with equity at the expense of constitutional and democratic values. This criticism largely appears to be a reaction to CRS's work under the HCPA, which requires that CRS "prevent and respond" to alleged hate crime cases involving bodily injury or threatened or attempted bodily injury based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability, as listed in the HCPA. Because the majority of CRS's work in recent years has been under the HCPA and CRS's case work is largely driven by requests for assistance from individuals and communities allegedly victimized under the HCPA, CRS appears to have developed the reputation that it primarily serves and advocates for minority racial and religious communities as well as sexual minorities and disabled persons. Despite CRS's commitment to the statutory mandates of neutrality and impartiality, it may be that individual CRS employees failed to adhere strictly to those mandates and taken on an impermissible posture of advocacy on behalf of minority groups, leading to the unfortunate perception of wokeness.

While I understand and acknowledge how these perceptions may have arisen, I do not believe wholesale defunding or elimination of CRS is warranted. Far from being woke and equity-obsessed, CRS is a collection of mediators and conflict resolution specialists driven by the statutory public safety mission of peacemaking in communities torn by mass violence, religious hatred resulting in damage to and interference with religious properties and free exercise of faith, and other violent hate crimes that result in bodily injuries and even death. Consisting of former police chiefs, law enforcement officers, clergypersons, veterans, prosecutors, and educators, among others, CRS maintains a culture of strong ethical and professional responsibility to ensure that conciliators strictly follow the statutory mandates and strictures in matters involving allegations of discrimination, unlawful bias, hate crimes, and religious and other hate-based violence.

Nonetheless, I recognize that CRS may and should take additional actions to fulfill its mandates in a more balanced manner and to be able to advance effectively President Trump's and Attorney General Pamela Bondi's public safety agenda and priorities.

The actions proposed below are an initial set of recommendations that I believe will allow CRS to contribute more robustly toward the fulfillment of the Administration's peacemaking and public safety goals.

V. Proposals to Promote More Robust Peacemaking by CRS

With the goal of placing CRS in a stronger and more focused position to fulfill its statutory mandates and to maximally advance President Trump's and AG Bondi's priorities, I propose the following actions to rebalance, refocus, and improve CRS's work over the next four years and beyond.

A. Strengthen and Expand CAPA Jurisdictional Work to Respond to Critical Incidents of Violence Involving Explosives

Since 1996, the Church Arson Prevention Act has allowed CRS to “prevent and respond” to alleged crimes committed under 18 U.S.C. 247 (damage to religious property and interference with free exercise of religion) and 844 (destructive conduct using fire or explosives). But CRS in recent years has not fully engaged with this mandate.⁶

CRS should engage more strategically and systematically to fulfill CAPA’s mandate to prevent and respond to alleged violations of 18 U.S.C. 844, which CRS has only periodically fulfilled since 1996. Violations of Section 844, which are committed through the use of fire, bombs, and other explosives, often require significant critical incident responses by law enforcement to immediately contain and investigate the public safety concerns posed by the violations. In critical incidents where significant community conflicts are known or anticipated, CRS has a significant role to play in coordination with the Department’s law enforcement components and other agencies. Consistent with the Administration’s public safety and violence prevention/intervention priorities, I recommend that the Department prioritize CRS’s CAPA jurisdictional work to address community conflicts that arise out of Section 844 violations.

CRS already has a Critical Incident Response Toolkit (CIRT) that guides CRS’s work in this area. In recent years, CRS, however, has not consistently engaged in critical incidents of national or regional significance, as the component’s focus has been more on doing preventive and local/regional programmatic training and consultation work under the HCPA. While continuing necessary work under the HCPA to prevent and respond to violent hate crimes, CRS should engage much more intentionally and strategically in responding to significant critical incidents.

When critical incidents occur, CRS’s immediate role is to coordinate with other DOJ components (such as USAOs, CRM, NSD, CRT, FBI, DEA, ATF, and COPS) regarding whether and how CRS can provide assistance and what community engagement and/or service delivery should take place. CRS must also identify which CRS services may be needed within the first 24 hours after the incident; identify who and how many CRS conciliators should be deployed to the affected jurisdiction; communicate with local police chief/sheriff and the mayor, as appropriate; and contact local community leaders (such as, faith leaders, community organizations, school administrators) to understand the immediate issues facing the community and the secondary and tertiary concerns for public safety.

In coordination with other DOJ components, CRS’s continuing role is to determine what additional CRS services are necessary (such as mediation, conciliation, training, and/or

⁶ In the 1990s, CRS was a member of the National Church Arson Task Force (NCATF) that was chaired by the White House. The NCATF had a three-prong strategy: (1) identify and prosecute the arsonists and other criminals who damaged religious properties; (2) help communities rebuild the damaged churches and other religious structures; and (3) offer local law enforcement assistance in preventing future crimes against religious properties. CRS worked with Christian and other religious leaders to educate them on available resources, communicate and coordinate with law enforcement, and mediate in cases where damages to religious properties led to inter-religious conflicts. The NCATF ended with the close of the Clinton Administration.

On January 29, 2001, President George W. Bush established the White House Faith-Based and Community Initiative, which President Trump renamed as the White House Faith Office on February 7, 2025.

facilitated dialogue to community and conflict stakeholders), conduct community outreach to identify and determine whether any of the following groups are involved in the communities' responses to the incident—community and religious organizations, protest groups, social media activists, and potential counter-demonstration groups; continue to identify and connect key conflict stakeholders; identify desired outcomes based on identified conflict (such as, establishing and/or improving police-community dialogues to reduce tension in the community); and coordinate with other relevant DOJ components and other federal agencies (such as, DHS, HUD, DOL, HHS) that are present in the community, when appropriate and in compliance with CRS's confidentiality and other jurisdictional mandates.

Under the leadership and guidance of OAG, ODAG, and OASG, and after further developing and refining CRS's CIRT and deployment principles and criteria, CRS should work in close coordination with relevant DOJ components to provide critically important and necessary peacemaking and violence prevention services in communities affected by mass violence and other major violations of Section 844.

B. Strengthen and Expand CAPA Jurisdictional Work to Protect Religious Communities

Consistent with the Administration's priorities on working with and supporting faith communities, I recommend that the Department prioritize CRS's CAPA jurisdictional work in relation to 18 U.S.C. 247 to provide more robust protections for faith communities and help resolve conflicts that arise among religious communities and between religious groups and secular groups where potential violations of Section 247 is implicated. Leveraging on longstanding relationships with religious communities across the Nation, CRS can and should do much more to promote peace and safety among religious communities that are regularly victimized by vandalism, violent acts, and intimidation.

Currently, in conjunction with USAOs, FBI, DHS's Cybersecurity and Infrastructure Security Agency, and state and local law enforcement agencies, CRS does provide many Protecting Places of Worship forums (PPOWs) with churches, synagogues, mosques, temples, and other places operated by religious communities. In addition, CRS has developed public training programs to combat anti-semitism and promote stronger understanding of and engagement with members of other religious communities such as Muslims, Sikhs, and Hindus. CRS regularly trains law enforcement and different religious communities to promote peaceful relations among them.

At the same time, CRS can engage in much more work among all religious communities, not just among small minority groups, to promote peace and connections among them, by more strategically engaging in outreach to major religious groups with whom CRS has not had significant relationships in recent years. In particular, in conjunction with the Task Force on Combating Anti-Semitism and the Task Force on Eradicating Anti-Christian Bias that President Trump has established, I recommend that CRS work more robustly to educate law enforcement, schools and universities, religious communities, and other community groups regarding the evil of anti-semitism, anti-Christian bias, and other forms of religious hatred and violence. I discuss CRS's proposed involvement with the Administration's major faith initiatives in greater detail below.

C. Help Lead the Administration’s Major Initiatives on and Outreach to Jewish, Christian, and Other Religious Communities in a Fair and Consistent Manner

1. **Center for Faith:** On February 7, 2025, President Trump issued an Executive Order on the Establishment of the White House Faith Office. CRS currently houses the now-renamed Center for Faith for the Justice Department, as we did during the last Administration when the director of the Center was a Schedule C employee who was formerly with the Sikh Coalition. The Center director has been reporting to the CRS director, while also reporting to ODAG and the White House. To my knowledge, the Center director position has not yet been filled by the Trump Administration.

Since January 20, 2025, I, along with another CRS colleague with a religious professional background, have been attending the weekly interagency Centers for Faith meetings and serving as the Center of DOJ point of contact.

I recommend that the Department Leadership keep the Center for Faith in CRS, which, given our longstanding work with religious communities, is the most logical location for the Center within the Department. Building upon my own background in Christian ministry and education (as an ordained pastor and religion professor in Christian colleges), I believe I will be able to work constructively with any Center director who may be appointed. The Center’s continuing placement in CRS will allow CRS to contribute to the President’s agenda more effectively and seamlessly to support “faith-based entities, community organizations, and houses of worship in their efforts to strengthen American families, promote work and self-sufficiency, and protect religious liberty,” which CRS has been doing for the past six decades.

2. **Task Force to Combat Anti-Semitism:** On January 29, 2025, President Trump issued an Executive Order on Additional Measures to Combat Anti-Semitism, which encouraged the Attorney General “to employ appropriate civil-rights enforcement authorities, such as 18 U.S.C. 241, to combat anti-Semitism.” As part of the Department’s fulfillment of the mandate coming from this Executive Order, the Department created an inter-agency Task Force to Combat Anti-Semitism.

I recommend that CRS take a leading role on this Task Force. Under our CAPA and HCPA jurisdictions, CRS has worked closely with Jewish communities to combat anti-semitism, prevent and address violent hate crimes against Jewish communities, and assist synagogues and temples with obtaining training and resources to better protect places of worship and gathering for Jewish communities. Last year, working closely with Anti-Defamation League (ADL), American Jewish Committee (AJC), Hillel, Secure Community Network, United Synagogue of Conservative Judaism, and other major Jewish organizations, CRS completed the development of a community and law enforcement education program called “Understanding and Building Relationships with Jewish Communities” (<https://www.justice.gov/crs/news/combating-antisemitism>), which we successfully piloted in Highland Park, Illinois, in January 2025. Participating in this pilot as co-presenters were representatives from ADL and AJC, with local city leaders, law enforcement officials, faith leaders, and school administrators in attendance praising the program as immensely helpful to combat anti-semitism in their communities. Building on upon this program and our historical close working relationships with Jewish communities throughout the Nation, CRS can take a strong role in fulfilling the President’s goal of combating anti-semitism.

3. **Task Force to Eradicate Anti-Christian Bias:** On February 6, 2025, President Trump issued an Executive Order on Eradicating Anti-Christian Bias. The Order created the Task Force to Eradicate Anti-Christian Bias led by the Attorney General.

I recommend that CRS also take a leading role on this Task Force. Again under our CAPA and HCPA mandates, CRS has worked closely with Christian churches to combat hate and violence against Christian communities. As noted above, through our Protecting Places of Worship forums, CRS has worked very closely with USAOs, FBI, DHS, and other agencies to assist Christian organizations of all denominations and traditions to provide training and resources on better protecting places of worship and combating bias and hate incidents against Christians. For example, in the past two years, CRS worked with the Archdiocese of Baltimore to conduct a PPOW for all 90+ Catholic parishes in the archdiocese. We continue to offer PPOWs and anti-hate crime consultations to Christian congregations throughout the Nation. Building on upon this program and many years of close working relationships with Christian communities throughout the Nation, CRS can take a significant role in fulfilling the President’s goal of eradicating anti-Christian bias.

D. Use CRS’s Expertise in Coordinating Facilitated Dialogues and Mediation to Conduct Public Forums with Victims to Restore a Measure of Justice to the Families of Victims of Commuted Murders

In her February 5, 2025 Memo on Restoring a Measure of Justice to the Families of Victims of Commuted Murderers, AG Bondi directed the Department to “explore opportunities to provide a public forum for the victims’ families to express how the commutations [of death sentences for murderers by President Biden] affected them personally.” I recommend that CRS’s expertise in conducting mediations and facilitated dialogues with communities victimized by violence be utilized to assist the Department in conducting the planned public forums announced in this memo.

* * *

For over 60 years, CRS has faithfully served as America’s unsung Peacemaker and Unifier of American communities—without publicity and bound within the pledge of confidentiality. With a renewed focus on responding to and de-escalating conflicts arising from major critical incidents, a rebalanced and recaptured commitment to fulfilling all of the CAPA jurisdictional mandates, and new opportunities for engaging in leadership and inter-agency collaboration to protect Jewish, Christian, and other religious communities harmed by hate and bias, CRS will make significant contributions to the advancement of the Trump Administration’s goals of fostering peace and safety among communities in conflict, bridging the painful divides in our social fabric, and bringing Americans of all persuasions and backgrounds together in civil and respectful discourse.

CRS can—and I believe should—be a core constituent part of President Trump’s legacy as a peacemaker and a unifier of our Nation and our World.

APPENDIX A

CRS’S Current Structure and Recent Staffing and Budget History

A. Current Structure

CRS currently has 57 FTE employees. Among them, 14 are headquarters employees in Washington, D.C. (with offices in 2CON), and 43 are regional employees in field offices throughout the Nation. In addition, CRS’s work is supported by nine contractors from CGI Federal who provide administrative and financial management services.

CRS is headed by a Director who is Presidentially appointed with Senate confirmation (PAS). The CRS Director position is one of five PAS “director” positions in the Justice Department. Second in command is a Deputy Director, which is a general SES position. Both of these top positions are currently vacant. The Associate Director, third in command, is a career GS-15 position, which is held by me. I have been serving as the component head since January 20, 2025. The headquarters office has four units: Administrative/Finance; Legal; Training and Program Development; and Center for Faith. The Center for Faith, which also reports to the White House Faith Office, was placed in CRS in 2024, and is currently covered by me.

CRS’s peacemaking mission is fulfilled primarily by Conciliation Specialists and Lead Conciliation Specialists who work in CRS’s five regions throughout the Nation. Each region is headed by a Regional Director who reports to the Associate Director. The five regions are: Atlantic North, Midwest, Mountain Central, South, and West Regions. Currently, CRS has four Regional Directors and 39 Conciliation Specialists in 27 field offices throughout the Nation.

B. Recent Staffing and Budget History

CRS’s staffing and budget history over the past nine fiscal years is as follows.

Fiscal Year	Year-End Staffing Level	Budget	Note
FY 2017	40 FTE (hiring freeze)	\$15.5 million	
FY 2018	37 FTE (hiring freeze)	\$15.4 million	
FY 2019	32 FTE (hiring freeze)	\$15.5 million	
FY 2020	27 FTE (hiring freeze)	\$16.0 million	For these two years, President Trump requested \$0 for CRS and proposed placement of CRS within CRT with \$5 million and 15 FTE
FY 2021	30 FTE	\$18.0 million	
FY 2022	34 FTE	\$21.0 million	
FY 2023	53 FTE	\$25.0 million	
FY 2024	52 FTE	\$24.0 million	
FY 2025	57 FTE (as of 2/13/2025)	\$29.0 million requested	Marked-Up CJS Bills ⁷ Senate: \$25.0 million; House: \$0

⁷ Congressional Research Service, “Overview of FY2025 Appropriations for Commerce, Justice, Science, and Related Agencies (CJS),” at 11. <https://crsreports.congress.gov/product/pdf/R/R48134/3> (last accessed Feb. 12, 2025).

Produced for Congress

APPENDIX B

Approaches for Implementation

Implementation of the proposals in this memo will vary depending on how the Department designs the Agency RIF and Reorganization Plan (ARRP), as required by the “Guidance on Agency RIF and Reorganization Plans Requested by *Implementing The President’s “Department of Government Efficiency” Workforce Optimization Initiative,*” that OMB and OPM issued on February 26, 2025.

CRS and the Department’s ARRP

The Department’s ARRP may pursue one of at least three major options for CRS, as outlined below.

Option 1: Continued Existence as a Separate Component

The Department may retain CRS as a separate component, as CRS has stood since its establishment in 1964. As a component statutorily created and headed by a Presidentially appointed and Senate confirmed (PAS) Director, CRS’s statutory mission may be best served by keeping it as a separate component reporting directly to the Department leadership (historically through the Associate Attorney General).

Under this option, the required consolidation of duplicative functions and regional field offices, reduction of non-critical roles, and elimination of unmandated work and positions would take place internally to CRS, while some of the necessary support functions may be served centrally by JMD. This option will allow CRS to maintain its historical standing as a stand-alone component with its own statutory confidentiality and non-publicity mandates, but it will achieve the least amount of consolidation and elimination of functions and services.

Option 2: Placement Within the Civil Rights Division

As the first Trump Administration proposed to Congress for FY 2020 and 2021, CRS may be placed within CRT. Given the historical relationship between CRS and CRT under the Civil Rights Act of 1964 and the Hate Crimes Prevention Act of 2009, as well as CRT’s leadership in implementing the Administration’s priorities for faith-related work, this placement has the benefit of bringing together the two components with connected equities and creating synergy to engage coherently and comprehensively in the prevention, intervention, enforcement, prosecution, and community outreach spaces regarding civil rights violations and hate crimes.

Under this approach, CRS and CRT should be able to consolidate such functions as the legal, communications, HR, travel, and IT services, as well as at least one leadership position—much more than Option 1 would allow for.

One area of potential concern is that CRS’s placement within CRT may lead to confusion and disbelief regarding CRS’s confidentiality, non-enforcement, and non-investigative mandates under the CRA. For example, stakeholders and complainants may be less inclined to seek CRS’s

services with CRS's reporting line being placed within a litigating/enforcement division of the Department.

If the Department were to implement Option 2, the Administration may need to submit a Reorganization Plan, as required by the Reorganization Act of 1977, 5 U.S.C. 903(a)(3) (requiring transmission of a reorganization plan to Congress for "the consolidation or coordination of the whole or a part of an agency, or of the whole or a part of the functions thereof, with the whole or a part of another agency or the functions thereof"). Historically, when CRS, which was initially placed in the Department of Commerce, was transferred to the Department in 1966, President Johnson submitted Reorganization Plan No. 1 of 1966 under the Reorganization Act of 1949, and explained in his accompanying message to Congress that "[t]he Attorney General will provide for the organization of the Community Relations Service as a separate unit within the Department of Justice."

Under Option 2, the CRS Director (holding a PAS position) will need to report directly to the AAG for CRT (without going through the DAAGs who occupy either career or Schedule C positions). This reporting structure would be unique within the Department, but not without precedent. Until 2012, the Omnibus Crime Control and Safe Streets Act of 1968, the Juvenile Justice and Delinquency Prevention Act of 1974, and the Victims of Crime Act of 1984 placed—within the Office of Justice Programs—the Bureau of Justice Statistics (42 U.S.C. 3732(b)), the Bureau of Justice Assistance (42 U.S.C. 3741(b)), the National Institute of Justice (42 U.S.C. 3722(b)), the Office of Juvenile Justice and Delinquency Prevention (42 U.S.C. 5611(b)), and the Office for Victims of Crime (42 U.S.C. 10605(b)), while requiring that the Directors of BJS, BJA, NIJ, and OVC, and the Administrator of OJJDP, be Presidentially appointed and Senate confirmed. Each statute also required that the head of each component report to the Attorney General *through* the AAG for OJP. Although the Presidential Appointment Efficiency and Streamlining Act of 2012, Pub. L. 112-166, removed the "advice and consent of the Senate" requirement from each of these positions, the 2012 act had no bearing on the legitimacy of placing these PAS positions under the AAG of OJP. To give clarity to the reporting structure, however,

Option 3: Placement Within the Office of Justice Programs

Another way to consolidate CRS with another component—but with a non-litigating and non-enforcement component—would be to bring CRS (and perhaps also ATJ, COPS, OTJ, and OVW) into the Office of Justice Programs (which currently consists of BJA, BJS, NIJ, OJJDP, OVC, and SMART). Given that all these offices and services are non-litigating and non-enforcement components that exist to provide various programs and services that help advance the Department's mission with a variety of stakeholders, adding CRS to the family of services available from OJP would address the concerns that come from placing CRS within a litigating component such as CRT.

Under this approach, as in Option 2, CRS and OJP should be able to consolidate such functions as the legal, communications, HR, travel, and IT services, as well as at least one leadership position—much more than Option 1 would allow for.

As with Option 2, if the Department were to implement Option 3, the Administration may also need to submit a Reorganization Plan.



Washington, DC 20530

DATE: February 13, 2025
TO: Office of the Associate Attorney General
FROM: Julius Nam, Associate Director & Component Head, CRS
RE: CRS 2025: A Proposal for Renewed Peacemaking

“My proudest legacy will be that of a peacemaker and unifier. That’s what I want to be: a peacemaker and a unifier.” – President Donald J. Trump, Inaugural Address, Jan. 20, 2025

I. CRS’s Mission and Current Challenges

Known as “America’s Peacemaker” since its creation over 60 years ago, the Community Relations Service (CRS) has resolved disputes and restored peace in communities torn by violence and intense conflict. Since its establishment through Title X of the Civil Rights Act of 1964 (CRA), CRS has provided mediation and conciliation services where “peaceful relations among the citizens of the community involved” were threatened by “disputes, disagreements, or difficulties,” including some of the Nation’s most contentious civil rights conflicts.

In recent years, however, CRS has faced significant challenges and criticisms. President Trump’s FY 2020 and FY 2021 budget messages to Congress did not include requests for an appropriation for CRS. Instead, the budget requests proposed to “consolidate” CRS’s functions within the Civil Rights Division to “rightsizing the Federal role in local conflict resolutions, while eliminating duplicative functions and improving efficiency” by reducing CRS’s personnel to 15 employees.¹

The FY 2023 federal budget proposal published by the Center for Renewing America (which was led by Russ Vought, director of the Office of Management and Budget in the first Trump Administration and again in the current Administration) called for “full elimination of the ‘equity’ obsessed” and “woke and weaponized” CRS, which the Center viewed to be “driven by race essentialism and radical gender theory—hunting for ‘hate crimes’ defined through the prism of critical race theory and intersectional progressivism.” Asserting that CRS “serves only to perpetuate the continuing efforts of Washington to label citizens as ‘oppressors’ or ‘oppressed,’ . . . tearing apart the civil fabric necessary for a constitutional republic to survive,” the Center proposed “a total defunding” of CRS.²

¹ “A Budget for a Better America, Promises Kept, Taxpayers First, Fiscal Year 2020 Budget of the U.S. Government.” Appendix at 698. <https://www.govinfo.gov/content/pkg/BUDGET-2020-APP/pdf/BUDGET-2020-APP.pdf> (last accessed Feb. 12, 2025).

² Center for Renewing America, “A Commitment to End Woke and Weaponized Government: 2023 Budget Proposal,” at 10, 13. <https://americarenewing.com/wp-content/uploads/2024/03/Budget-Center-for-Renewing->

Similarly, the Republican Study Committee’s FY 2025 budget proposal called for the elimination of CRS because, according to the RSC, CRS “deviates from the core purpose of the DOJ to investigate and prosecute violations of federal law,” but “[i]nstead, the entity attempts to act as ‘peacemaker’ in local disputes and has been used by the Biden Administration to push its woke gender and CRT ideologies.”³ The House’s current marked-up text of the Commerce-Justice-Science (CJS) appropriations bill (which has not had a floor vote yet) has \$0 for CRS. On the other hand, the Senate’s marked-up CJS appropriations bill (which also has not had a floor vote yet) has \$25.0 million allotted for CRS.

In light of these recent calls for defunding and elimination of CRS, the Office of the Associate Attorney General directed me on February 7, 2025 to submit a memo that responds to the criticisms against CRS and identifies avenues of CRS’s contributions under the current Administration.

In response, I provide below an overview CRS’s jurisdictional statutes, a summary of CRS’s core activities, an analysis of the recent criticisms against CRS, and a proposal for CRS’s contributions toward the advancement of the Trump Administration’s peacemaking and public safety goals in the next four years and beyond. Also attached is an appendix to this memo that describes CRS’s current structure and recent staffing and budget history.

II. Overview of CRS’s Jurisdictional Statutes

A. Civil Rights Act of 1964

As the Center for Renewing America correctly notes, CRS “was originally created in Title X of the Civil Rights Act of 1964 as an agency tasked with maintaining dialogue and ensuring a smooth transition out of the era of segregation.”⁴ Conceived to undertake and coordinate mediation and conciliation in explosive situations and tension-torn communities affected by alleged discrimination based on race, color or national origin in public accommodation and other settings, CRS was initially placed in the Commerce Department and was moved to the Justice Department in 1966 through Reorganization Plan of that year. As President Lyndon B. Johnson’s message regarding this reorganization stated, CRS, by being in “closer relationship with the Attorney General and the Civil Rights Division of the Department of Justice, will gain by becoming a primary resource in a coordinated effort in civil rights under the leadership of the Attorney General.”⁵

Under the CRA, the mission of CRS continues to be “to provide assistance to communities and persons therein in resolving disputes, disagreements, or difficulties relating to discriminatory practices based on race, color, or national origin” and restoring “peaceful relations among the citizens of the community involved.” To allow CRS to approach communities in conflict with impartiality and build trusting relationships, the CRA mandated

[America-FY23.pdf](#) (last accessed Feb. 12, 2025). Project 2025, on the other hand, does not contain a reference to CRS.

³ Republic Study Committee, “Fiscal Sanity to Save America: Republic Study Committee FY 2025 Budget Proposal,” at 148. https://hern.house.gov/uploadedfiles/final_budget_including_letter_web_version.pdf (last accessed Feb. 12, 2025).

⁴ “A Commitment to End Woke and Weaponized Government,” at 13.

⁵ 5 U.S.C. App., Reorganization Plan No. 1 of 1966, “Message of the President.”

that CRS conduct “conciliation assistance . . . in confidence and without publicity,” “hold confidential any information acquired in the regular performance of its duties,” and not “engage in the performance of investigative or prosecuting functions of any department or agency in any litigation arising out of a dispute” handled by CRS. Any CRS member who breaks the confidentiality mandate may be prosecuted for a misdemeanor offense under the CRA. 42 U.S.C. 2000g-1, 2000g-2.

In addition, the CRA conferred CRS a role in federal judicial proceedings. The act gave district courts authority to refer parties in CRA public accommodation cases to CRS for CRS to conduct voluntary settlement proceedings with the parties. 42 U.S.C. 2000a-3, 2000a-4.

CRS is also required under the CRA to submit an annual report due to Congress each January 31. 42 U.S.C. 2000g-3.

B. Fair Housing Act of 1968 (and Fair Housing Amendment Act of 1988)

The FHA, which was part of the Civil Rights Act of 1968, recognized CRS’s role in preventing and eliminating discriminatory housing practices, and directed the Secretary of Housing and Urban Development to assist CRS with this work. 42 U.S.C. 3608(e)(4).

C. Church Arson Prevention Act of 1996

The CAPA—which strengthened existing 18 U.S.C. 247 to provide for a more robust protection of religious properties and faith communities from intentional interference of their free exercise of religion and destructive conduct targeting religious properties—directed CRS to “prevent, and respond to potential violations” 18 U.S.C. 247 (damage to religious property and interference with free exercise of religion) and 844 (destructive conduct using fire, bombs, or other explosives). Pub. L. 104-155, Sec. 6.

D. Emmett Till Unsolved Civil Rights Crime Act of 2007 & Emmett Till Unsolved Civil Rights Crimes Reauthorization Act of 2016

The Till Act of 2007, which directed the Civil Rights Division to investigate civil rights era unsolved homicides, mandated CRS (in carrying out the functions described in Title X of the CRA) “to provide technical assistance by bringing together law enforcement agencies and communities in the investigation of violations of criminal civil rights statutes.” Pub. L. 110-344. The Till Reauthorization Act of 2016 further required CRS to “provide technical assistance by bringing together law enforcement agencies and communities to address tensions raised by Civil Rights era crimes.” Pub. L. 114-325, Sec. 2.

E. Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009

Through the HCPA, Congress created a new federal hate crime in 18 U.S.C. 249 (bodily injury or attempted/threatened bodily injury based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability). The HCPA further directed CRS to “prevent and respond to alleged violations” of Section 249.

III. CRS's Core Activities

Guided by the above five jurisdiction-conferring statutes, CRS responds to communities experiencing incidents of mass violence and other deeply divisive conflicts to restore peaceful relations. Working closely with federal, state, tribal, and local governments, law enforcement agencies, religious organizations, community groups, and educational institutions, CRS helps communities to resolve conflicts and disputes through mediation, facilitated dialogue, training, and consultation. CRS provides these services in a neutral and impartial manner only when the parties voluntarily accept CRS's services. As required by the CRA, CRS works under the mandates of confidentiality, non-publicity, and non-involvement in prosecution, litigation, investigation, or enforcement.

CRS's work in communities may fall into three major categories.

First, CRS responds to critical incidents (including high-profile civil rights incidents) to prevent further violence, de-escalate and diffuse community tensions, and offer assistance to government authorities, law enforcement, and communities affected by the incidents. As part of these services, CRS conducts formal mediation and facilitated dialogues among communities in conflict and, in coordination with law enforcement agencies, provides contingency training and event marshal training to groups, among other services.

Second, CRS engages in violence and hate crime prevention services through educational and training programs offered to stakeholders, including victim groups and various civic and community organizations. As part of this prevention work, CRS also conducts facilitated dialogues among communities in conflict and offers public safety consultation services to various institutions to support their capacity building for violence intervention and hate crimes prevention.

Third, CRS provides training and consultation support to federal, state, tribal, and local law enforcement agencies to help officers understand various community groups and religious traditions better and engage with them more effectively in the administration of justice.

IV. Analysis of Recent Criticisms and Challenges

As noted at the outset, the recent challenges to CRS coming with defunding and elimination calls have presented the concerns that CRS's functions are duplicative and inefficient and that CRS is driven by an unconstitutional "woke" ideology on race and sex. With respect, I submit that those characterizations are largely inaccurate, though I acknowledge that certain rebalancing, refocusing, and ameliorative actions may be necessary to better advance CRS's statutory mandates and President Trump's public safety priorities.

First, CRS's functions are not duplicative of any functions currently fulfilled by a Justice Department component. CRS is the sole federal entity that provides public safety mediation, consultation, dialogue facilitation, and training services to state, tribal, and local governments, law enforcement agencies, community groups, religious organizations, and educational institutions. Unlike the Civil Rights Division, U.S. Attorney's Offices, FBI, and other enforcement/investigative/litigating components, CRS is the only component that functions in a neutral and impartial manner to respond to and de-escalate violent and other volatile conflict situations. CRS may appear to fulfill duplicative community event organizing functions that are

also handled by community outreach personnel in CRT, USAOs, and other components. But CRS's community events are methodically designed to address, prevent, and de-escalate actual conflicts in the communities and are tightly connected with CRS's strategic goal of providing mediation and conflict resolution services as a neutral and impartial entity. This is an entirely unique function that CRS performs within the Department in fulfillment of its significant public safety mandates.

Second, CRS is neither a "woke" nor "weaponized" agency that is obsessed with concerns for equity, critical race theory, or gender ideology. CRS does not have either a formal or an informal ideological or political strategy that would be defined as "woke" or unhealthily preoccupied with equity at the expense of other constitutional and democratic values. This criticism largely appears to be a reaction to CRS's work under the HCPA, which requires that CRS "prevent and respond" to alleged hate crime cases involving bodily injury or threatened or attempted bodily injury based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability, as listed in the HCPA. Because the majority of CRS's work in recent years has been under the HCPA and CRS's case work is largely driven by requests for assistance from individuals and communities allegedly victimized under the HCPA, CRS appears to have developed the reputation that it primarily serves and advocates for minority racial and religious communities as well as sexual minorities and disabled persons. Despite CRS's commitment to the statutory mandates of neutrality and impartiality, it may be that individual CRS employees failed to adhere strictly to those mandates and taken on an impermissible posture of advocacy on behalf of minority groups, leading to the unfortunate perception of wokeness.

While I understand and acknowledge how these perceptions may have arisen, I do not believe wholesale defunding or elimination of CRS is warranted. Far from being woke and equity-obsessed, CRS is a collection of mediators and conflict resolution specialists driven by the statutory public safety mission of peacemaking in communities torn by mass violence, religious hatred resulting in damage to and interference with religious properties and free exercise of faith, and other violent hate crimes that result in bodily injuries and even death. Consisting of former law enforcement officers, clergypersons, veterans, prosecutors, and educators, among others, CRS maintains a culture of strong ethical and professional responsibility to ensure that conciliators strictly follow the statutory mandates and strictures in matters involving allegations of discrimination, unlawful bias, hate crimes, and religious and other hate-based violence.

Nonetheless, I recognize that CRS may and should take additional actions to fulfill its mandates in a more balanced manner and to be able to advance effectively President Trump's and Attorney General Pamela Bondi's public safety agenda and priorities.

The actions proposed below are an initial set of recommendations that I believe will allow CRS to contribute more robustly toward the fulfillment of the Administration's peacemaking and public safety goals.

V. Proposals to Promote More Robust Peacemaking by CRS

With the goal of placing CRS in a stronger and more focused position to fulfill its statutory mandates and to maximally advance President Trump's and AG Bondi's priorities, I propose the following actions to rebalance, refocus, and improve CRS's work over the next four years and beyond.

A. Strengthen and Expand CAPA Jurisdictional Work to Respond to Critical Incidents of Violence Involving Explosives

Although since 1996 the Church Arson Prevention Act has allowed CRS to “prevent and respond” to alleged crimes committed under 18 U.S.C. 247 (damage to religious property and interference with free exercise of religion) and 844 (destructive conduct using fire or explosives), CRS in recent years has not yet fully engaged with this mandate.⁶

CRS should engage more strategically and systematically to fulfill CAPA’s mandate to prevent and respond to alleged violations of 18 U.S.C. 844, which CRS has only periodically fulfilled since 1996. Violations of Section 844, which are committed through the use of fire, bombs, and other explosives, often require significant critical incident responses by law enforcement to immediately contain and investigate the public safety concerns posed by the violations. In critical incidents where significant community conflicts are known or anticipated, CRS has a significant role to play in coordination with the Department’s law enforcement components and other agencies. Consistent with the Administration’s public safety and violence prevention/intervention priorities, I recommend that the Department prioritize CRS’s CAPA jurisdictional work to address community conflicts that arise out of Section 844 violations.

CRS already has a Critical Incident Response Toolkit (CIRT) that guides CRS’s work in this area. In recent years, CRS, however, has not consistently engaged in critical incidents of national or regional significance, as the component’s focus has been more on doing preventive and local/regional programmatic training and consultation work under the HCPA. While continuing necessary work under the HCPA to prevent and respond to violent hate crimes, CRS should engage much more intentionally and strategically in responding to significant critical incidents.

When critical incidents occur, CRS’s immediate role is to coordinate with other DOJ components (such as USAOs, CRM, NSD, CRT, FBI, DEA, ATF, and COPS) regarding whether and how CRS can provide assistance and what community engagement and/or service delivery should take place. CRS must also identify which CRS services may be needed within the first 24 hours after the incident; identify who and how many CRS conciliators should be deployed to the affected jurisdiction; communicate with local police chief/sheriff and the mayor, as appropriate; and contact local community leaders (such as, faith leaders, community organizations, school administrators) to understand the immediate issues facing the community and the secondary and tertiary concerns for public safety.

In coordination with other DOJ components, CRS’s continuing role is to determine what additional CRS services are necessary (such as mediation, conciliation, training, and/or facilitated dialogue to community and conflict stakeholders), conduct community outreach to

⁶ In the 1990s, CRS was a member of the National Church Arson Task Force (NCATF) that was chaired by the White House. The NCATF had a three-prong strategy: (1) identify and prosecute the arsonists and other criminals who damaged religious properties; (2) help communities rebuild the damaged churches and other religious structures; and (3) offer local law enforcement assistance in preventing future crimes against religious properties. CRS worked with Christian and other religious leaders to educate them on available resources, communicate and coordinate with law enforcement, and mediate in cases where damages to religious properties led to inter-religious conflicts. The NCATF ended with the close of the Clinton Administration.

On January 29, 2001, President George W. Bush established the White House Faith-Based and Community Initiative, which President Trump renamed as the White House Faith Office on February 7, 2025.

identify and determine whether any of the following groups are involved in the communities' responses to the incident—community and religious organizations, protest groups, social media activists, and potential counter-demonstration groups; continue to identify and connect key conflict stakeholders; identify desired outcomes based on identified conflict (such as, establishing and/or improving police-community dialogues to reduce tension in the community); and coordinate with other relevant DOJ components and other federal agencies (such as, DHS, HUD, DOL, HHS) that are present in the community, when appropriate and in compliance with CRS's confidentiality and other jurisdictional mandates.

Under the leadership and guidance of OAG, ODAG, and OASG, and after further developing and refining CRS's CIRT and deployment principles and criteria, CRS should work in close coordination with relevant DOJ components to provide critically important and necessary peacemaking and violence prevention services in communities affected by mass violence and other major violations of Section 844.

B. Strengthen and Expand CAPA Jurisdictional Work to Protect Religious Communities

Consistent with the Administration's priorities on working with and supporting faith communities, I recommend that the Department prioritize CRS's CAPA jurisdictional work in relation to 18 U.S.C. 247 to provide more robust protections for faith communities and help resolve conflicts that arise among religious communities and between religious groups and secular groups where potential violations of Section 247 is implicated. Leveraging on longstanding relationships with religious communities across the Nation, CRS can and should do much more to promote peace and safety among religious communities that are regularly victimized by vandalism, violent acts, and intimidation.

Currently, in conjunction with USAOs, FBI, DHS's Cybersecurity and Infrastructure Security Agency, and state and local law enforcement agencies, CRS does provide many Protecting Places of Worship forums (PPOWs) with churches, synagogues, mosques, temples, and other places operated by religious communities. In addition, CRS has developed public training programs to combat anti-semitism and promote stronger understanding of and engagement with members of other religious communities such as Muslims, Sikhs, and Hindus. CRS regularly trains law enforcement and different religious communities to promote peaceful relations among them.

At the same time, CRS can engage in much more work among all religious communities, not just among small minority groups, to promote peace and connections among them, by more strategically engaging in outreach to major religious groups with whom CRS has not had significant relationships in recent years. In particular, in conjunction with the Task Force on Combating Anti-Semitism and the Task Force on Eradicating Anti-Christian Bias that President Trump has established, I recommend that CRS work more robustly to educate law enforcement, schools and universities, religious communities, and other community groups regarding the evil of anti-semitism, anti-Christian bias, and other forms of religious hatred and violence. I discuss CRS's proposed involvement with the Administration's major faith initiatives in greater detail below.

C. Help Lead the Administration’s Major Initiatives on and Outreach to Jewish, Christian, and Other Religious Communities in a Fair and Consistent Manner

1. **Center for Faith:** On February 7, 2025, President Trump issued an Executive Order on the Establishment of the White House Faith Office. CRS currently houses the now-renamed Center for Faith for the Justice Department, as we did during the last Administration when the director of the Center was a Schedule C employee who was formerly with the Sikh Coalition. The Center director has been reporting to the CRS director, while also reporting to ODAG and the White House. To my knowledge, the Center director position has not yet been filled by the Trump Administration.

Since January 20, 2025, I, along with another CRS colleague with a religious professional background, have been attending the weekly interagency Centers for Faith meetings and serving as the Center of DOJ point of contact.

I recommend that the Department Leadership keep the Center for Faith in CRS, which, given our longstanding work with religious communities, is the most logical location for the Center within the Department. Building upon my own background in Christian ministry and education (as an ordained pastor and religion professor in Christian colleges), I believe I will be able to work constructively with any Center director who may be appointed. The Center’s continuing placement in CRS will allow CRS to contribute to the President’s agenda more effectively and seamlessly to support “faith-based entities, community organizations, and houses of worship in their efforts to strengthen American families, promote work and self-sufficiency, and protect religious liberty,” which CRS has been doing for the past six decades.

2. **Task Force to Combat Anti-Semitism:** On January 29, 2025, President Trump issued an Executive Order on Additional Measures to Combat Anti-Semitism, which encouraged the Attorney General “to employ appropriate civil-rights enforcement authorities, such as 18 U.S.C. 241, to combat anti-Semitism.” As part of the Department’s fulfillment of the mandate coming from this Executive Order, the Department created an inter-agency Task Force to Combat Anti-Semitism.

I recommend that CRS take a leading role on this Task Force. Under our CAPA and HCPA jurisdictions, CRS has worked closely with Jewish communities to combat anti-semitism, prevent and address violent hate crimes against Jewish communities, and assist synagogues and temples with obtaining training and resources to better protect places of worship and gathering for Jewish communities. Last year, working closely with Anti-Defamation League (ADL), American Jewish Committee (AJC), Hillel, Secure Community Network, United Synagogue of Conservative Judaism, and other major Jewish organizations, CRS completed the development of a community and law enforcement education program called “Understanding and Building Relationships with Jewish Communities” (<https://www.justice.gov/crs/news/combating-antisemitism>), which we successfully piloted in Highland Park, Illinois, in January 2025. Participating in this pilot as co-presenters were representatives from ADL and AJC, with local city leaders, law enforcement officials, faith leaders, and school administrators in attendance praising the program as immensely helpful to combat anti-semitism in their communities. Building on upon this program and our historical close working relationships with Jewish communities throughout the Nation, CRS can take a strong role in fulfilling the President’s goal of combating anti-semitism.

3. **Task Force to Eradicate Anti-Christian Bias:** On February 6, 2025, President Trump issued an Executive Order on Eradicating Anti-Christian Bias. The Order created the Task Force to Eradicate Anti-Christian Bias led by the Attorney General.

I recommend that CRS also take a leading role on this Task Force. Again under our CAPA and HCPA mandates, CRS has worked closely with Christian churches to combat hate and violence against Christian communities. As noted above, through our Protecting Places of Worship forums, CRS has worked very closely with USAOs, FBI, DHS, and other agencies to assist Christian organizations of all denominations and traditions to provide training and resources on better protecting places of worship and combating bias and hate incidents against Christians. For example, in the past two years, CRS worked with the Archdiocese of Baltimore to conduct a PPOW for all 90+ Catholic parishes in the archdiocese. We continue to offer PPOWs and anti-hate crime consultations to Christian congregations throughout the Nation. Building on upon this program and many years of close working relationships with Christian communities throughout the Nation, CRS can take a significant role in fulfilling the President’s goal of eradicating anti-Christian bias.

D. Use CRS’s Expertise in Coordinating Facilitated Dialogues and Mediation to Conduct Public Forums with Victims to Restore a Measure of Justice to the Families of Victims of Commuted Murders

In her February 5, 2025 Memo on Restoring a Measure of Justice to the Families of Victims of Commuted Murderers, AG Bondi directed the Department to “explore opportunities to provide a public forum for the victims’ families to express how the commutations [of death sentences for murderers by President Biden] affected them personally.” I recommend that CRS’s expertise in conducting mediations and facilitated dialogues with communities victimized by violence be utilized to assist the Department in conducting the planned public forums announced in this memo.

* * *

For over 60 years, CRS has faithfully served as America’s unsung Peacemaker and Unifier of American communities—without publicity and bound within the pledge of confidentiality. With a renewed focus on responding to and de-escalating conflicts arising from major critical incidents, a rebalanced and recaptured commitment to fulfilling all of the CAPA jurisdictional mandates, and new opportunities for engaging in leadership and inter-agency collaboration to protect Jewish, Christian, and other religious communities harmed by hate and bias, CRS will make significant contributions to the advancement of the Trump Administration’s goals of fostering peace and safety among communities in conflict, bridging the painful divides in our social fabric, and bringing Americans of all persuasions and backgrounds together in civil and respectful discourse.

CRS can—and I believe should—be a core constituent part of President Trump’s legacy as a peacemaker and a unifier of our Nation and our World.

APPENDIX A

CRS’S Current Structure and Recent Staffing and Budget History

A. Current Structure

CRS currently has 57 FTE employees. Among them, 14 are headquarters employees in Washington, D.C. (with offices in 2CON), and 43 are regional employees in field offices throughout the Nation. In addition, CRS’s work is supported by nine contractors from CGI Federal who provide administrative and financial management services.

CRS is headed by a Director who is Presidentially appointed with Senate confirmation (PAS). The CRS Director position is one of five PAS “director” positions in the Justice Department. Second in command is a Deputy Director, which is a general SES position. Both of these top positions are currently vacant. The Associate Director, third in command, is a career GS-15 position, which is held by me. I have been serving as the component head since January 20, 2025. The headquarters office has four units: Administrative/Finance; Legal; Training and Program Development; and Center for Faith. The Center for Faith, which also reports to the White House Faith Office, was placed in CRS in 2024, and is currently covered by me.

CRS’s peacemaking mission is fulfilled primarily by Conciliation Specialists and Lead Conciliation Specialists who work in CRS’s five regions throughout the Nation. Each region is headed by a Regional Director who reports to the Associate Director. The five regions are: Atlantic North, Midwest, Mountain Central, South, and West Regions. Currently, CRS has four Regional Directors and 39 Conciliation Specialists in 27 field offices throughout the Nation.

B. Recent Staffing and Budget History

CRS’s staffing and budget history over the past nine fiscal years is as follows.

Fiscal Year	Year-End Staffing Level	Budget	Note
FY 2017	40 FTE (hiring freeze)	\$15.5 million	
FY 2018	37 FTE (hiring freeze)	\$15.4 million	
FY 2019	32 FTE (hiring freeze)	\$15.5 million	
FY 2020	27 FTE (hiring freeze)	\$16.0 million	For these two years, President Trump requested \$0 for CRS and proposed placement of CRS within CRT with \$5 million and 15 FTE
FY 2021	30 FTE	\$18.0 million	
FY 2022	34 FTE	\$21.0 million	
FY 2023	53 FTE	\$25.0 million	
FY 2024	52 FTE	\$24.0 million	
FY 2025	57 FTE (as of 2/13/2025)	\$29.0 million requested	Marked-Up CJS Bills ⁷ Senate: \$25.0 million; House: \$0

⁷ Congressional Research Service, “Overview of FY2025 Appropriations for Commerce, Justice, Science, and Related Agencies (CJS),” at 11. <https://crsreports.congress.gov/product/pdf/R/R48134/3> (last accessed Feb. 12, 2025).

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APPENDIX B

Approaches for Implementation

Implementation of the proposals in this memo will vary depending on how the Department designs the Agency RIF and Reorganization Plan (ARRP), as required by the “Guidance on Agency RIF and Reorganization Plans Requested by *Implementing The President’s “Department of Government Efficiency” Workforce Optimization Initiative,*” that OMB and OPM issued on February 26, 2025.

CRS and the Department’s ARRP

The Department’s ARRP may pursue one of at least three major options for CRS, as outlined below.

Option 1: Continued Existence as a Separate Component

The Department may retain CRS as a separate component, as CRS has stood since its establishment in 1964. As a component statutorily created and headed by a Presidentially appointed and Senate confirmed (PAS) Director, CRS’s statutory mission may be best served by keeping it as a separate component reporting directly to the Department leadership (historically through the Associate Attorney General).

Under this option, the required consolidation of duplicative functions and regional field offices, reduction of non-critical roles, and elimination of unmandated work and positions would take place internally to CRS, while some of the necessary support functions may be served centrally by JMD. This option will allow CRS to maintain its historical standing as a stand-alone component with its own statutory confidentiality and non-publicity mandates, but it will achieve the least amount of consolidation and elimination of functions and services.

Option 2: Placement Within the Civil Rights Division

As the first Trump Administration proposed to Congress for FY 2020 and 2021, CRS may be placed within CRT. Given the historical relationship between CRS and CRT under the Civil Rights Act of 1964 and the Hate Crimes Prevention Act of 2009, as well as CRT’s leadership in implementing the Administration’s priorities for faith-related work, this placement has the benefit of bringing together the two components with connected equities and creating synergy to engage coherently and comprehensively in the prevention, intervention, enforcement, prosecution, and community outreach spaces regarding civil rights violations and hate crimes.

Under this approach, CRS and CRT should be able to consolidate such functions as the legal, communications, HR, travel, and IT services, as well as at least one leadership position—much more than Option 1 would allow for.

One area of potential concern is that CRS’s placement within CRT may lead to confusion and disbelief regarding CRS’s confidentiality, non-enforcement, and non-investigative mandates under the CRA. For example, stakeholders and complainants may be less inclined to seek CRS’s

services with CRS's reporting line being placed within a litigating/enforcement division of the Department.

If the Department were to implement Option 2, the Administration may need to submit a Reorganization Plan, as required by the Reorganization Act of 1977, 5 U.S.C. 903(a)(3) (requiring transmission of a reorganization plan to Congress for "the consolidation or coordination of the whole or a part of an agency, or of the whole or a part of the functions thereof, with the whole or a part of another agency or the functions thereof"). Historically, when CRS, which was initially placed in the Department of Commerce, was transferred to the Department in 1966, President Johnson submitted Reorganization Plan No. 1 of 1966 under the Reorganization Act of 1949, and explained in his accompanying message to Congress that "[t]he Attorney General will provide for the organization of the Community Relations Service as a separate unit within the Department of Justice."

Under Option 2, the CRS Director (holding a PAS position) will need to report directly to the AAG for CRT (without going through the DAAGs who occupy either career or Schedule C positions). This reporting structure would be unique within the Department, but not without precedent. Until 2012, the Omnibus Crime Control and Safe Streets Act of 1968, the Juvenile Justice and Delinquency Prevention Act of 1974, and the Victims of Crime Act of 1984 placed—within the Office of Justice Programs—the Bureau of Justice Statistics (42 U.S.C. 3732(b)), the Bureau of Justice Assistance (42 U.S.C. 3741(b)), the National Institute of Justice (42 U.S.C. 3722(b)), the Office of Juvenile Justice and Delinquency Prevention (42 U.S.C. 5611(b)), and the Office for Victims of Crime (42 U.S.C. 10605(b)), while requiring that the Directors of BJS, BJA, NIJ, and OVC, and the Administrator of OJJDP, be Presidentially appointed and Senate confirmed. Each statute also required that the head of each component report to the Attorney General *through* the AAG for OJP. Although the Presidential Appointment Efficiency and Streamlining Act of 2012, Pub. L. 112-166, removed the "advice and consent of the Senate" requirement from each of these positions, the 2012 act had no bearing on the legitimacy of placing these PAS positions under the AAG of OJP. To give clarity to the reporting structure, however,

Option 3: Placement Within the Office of Justice Programs

Another way to consolidate CRS with another component—but with a non-litigating and non-enforcement component—would be to bring CRS (and perhaps also ATJ, COPS, OTJ, and OVW) into the Office of Justice Programs (which currently consists of BJA, BJS, NIJ, OJJDP, OVC, and SMART). Given that all these offices and services are non-litigating and non-enforcement components that exist to provide various programs and services that help advance the Department's mission with a variety of stakeholders, adding CRS to the family of services available from OJP would address the concerns that come from placing CRS within a litigating component such as CRT.

Under this approach, as in Option 2, CRS and OJP should be able to consolidate such functions as the legal, communications, HR, travel, and IT services, as well as at least one leadership position—much more than Option 1 would allow for.

As with Option 2, if the Department were to implement Option 3, the Administration may also need to submit a Reorganization Plan.

APPENDIX B

Approaches for Implementation

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CRS and the Department’s ARRP

The Department’s ARRP may pursue one of at least three major options for CRS, as outlined below.

Option 1: Continued Existence as a Separate Component

The Department may retain CRS as a separate component, as CRS has stood since its establishment in 1964. As a component statutorily created and headed by a Presidentially appointed and Senate confirmed (PAS) Director, CRS’s statutory mission may be best served by keeping it as a separate component reporting directly to the Department leadership (historically through the Associate Attorney General).

Under this option, the required consolidation of duplicative functions and regional field offices, reduction of non-critical roles, and elimination of unmandated work and positions would take place internally to CRS, while some of the necessary support functions may be served centrally by JMD. This option will allow CRS to maintain its historical standing as a stand-alone component with its own statutory confidentiality and non-publicity mandates, but it will achieve the least amount of consolidation and elimination of functions and services.

Option 2: Placement Within the Civil Rights Division

As the first Trump Administration proposed to Congress for FY 2020 and 2021, CRS may be placed within CRT. Given the historical relationship between CRS and CRT under the Civil Rights Act of 1964 and the Hate Crimes Prevention Act of 2009, as well as CRT’s leadership in implementing the Administration’s priorities for faith-related work, this placement has the benefit of bringing together the two components with connected equities and creating synergy to engage coherently and comprehensively in the prevention, intervention, enforcement, prosecution, and community outreach spaces regarding civil rights violations and hate crimes.

Under this approach, CRS and CRT should be able to consolidate such functions as the legal, communications, HR, travel, and IT services, as well as at least one leadership position—much more than Option 1 would allow for.

One area of potential concern is that CRS’s placement within CRT may lead to confusion and disbelief regarding CRS’s confidentiality, non-enforcement, and non-investigative mandates under the CRA. For example, stakeholders and complainants may be less inclined to seek CRS’s

services with CRS’s reporting line being placed within a litigating/enforcement division of the Department.

If the Department were to implement Option 2, the Administration may need to submit a Reorganization Plan, as required by the Reorganization Act of 1977, 5 U.S.C. 903(a)(3) (requiring transmission of a reorganization plan to Congress for “the consolidation or coordination of the whole or a part of an agency, or of the whole or a part of the functions thereof, with the whole or a part of another agency or the functions thereof”). Historically, when CRS, which was initially placed in the Department of Commerce, was transferred to the Department in 1966, President Johnson submitted Reorganization Plan No. 1 of 1966 under the Reorganization Act of 1949, and explained in his accompanying message to Congress that “[t]he Attorney General will provide for the organization of the Community Relations Service as a separate unit within the Department of Justice.”

Under Option 2, the CRS Director (holding a PAS position) will need to report directly to the AAG for CRT (without going through the DAAGs who occupy either career or Schedule C positions). This reporting structure would be unique within the Department, but not without precedent. Until 2012, the Omnibus Crime Control and Safe Streets Act of 1968, the Juvenile Justice and Delinquency Prevention Act of 1974, and the Victims of Crime Act of 1984 placed—within the Office of Justice Programs—the Bureau of Justice Statistics (42 U.S.C. 3732(b)), the Bureau of Justice Assistance (42 U.S.C. 3741(b)), the National Institute of Justice (42 U.S.C. 3722(b)), the Office of Juvenile Justice and Delinquency Prevention (42 U.S.C. 5611(b)), and the Office for Victims of Crime (42 U.S.C. 10605(b)), while requiring that the Directors of BJS, BJA, NIJ, and OVC, and the Administrator of OJJDP, be Presidentially appointed and Senate confirmed. Each statute also required that the head of each component report to the Attorney General *through* the AAG for OJP. Although the Presidential Appointment Efficiency and Streamlining Act of 2012, Pub. L. 112-166, removed the “advice and consent of the Senate” requirement from each of these positions, the 2012 act had no bearing on the legitimacy of placing these PAS positions under the AAG of OJP. To give clarity to the reporting structure, however,

Option 3: Placement Within the Office of Justice Programs

Another way to consolidate CRS with another component—but with a non-litigating and non-enforcement component—would be to bring CRS (and perhaps also ATJ, COPS, OTJ, and OVW) into the Office of Justice Programs (which currently consists of BJA, BJS, NIJ, OJJDP, OVC, and SMART). Given that all these offices and services are non-litigating and non-enforcement components that exist to provide various programs and services that help advance the Department’s mission with a variety of stakeholders, adding CRS to the family of services available from OJP would address the concerns that come from placing CRS within a litigating component such as CRT.

Under this approach, as in Option 2, CRS and OJP should be able to consolidate such functions as the legal, communications, HR, travel, and IT services, as well as at least one leadership position—much more than Option 1 would allow for.

As with Option 2, if the Department were to implement Option 3, the Administration may also need to submit a Reorganization Plan.



Washington, DC 20530

DATE: February 13, 2025
TO: Office of the Associate Attorney General
FROM: Julius Nam, Associate Director & Component Head, CRS
RE: CRS 2025: A Proposal for Renewed Peacemaking

“My proudest legacy will be that of a peacemaker and unifier. That’s what I want to be: a peacemaker and a unifier.” – President Donald J. Trump, Inaugural Address, Jan. 20, 2025

I. CRS’s Mission and Current Challenges

Known as “America’s Peacemaker” since its creation over 60 years ago, the Community Relations Service (CRS) has resolved disputes and restored peace in communities torn by violence and intense conflict. Since its establishment through Title X of the Civil Rights Act of 1964 (CRA), CRS has provided mediation and conciliation services where “peaceful relations among the citizens of the community involved” were threatened by “disputes, disagreements, or difficulties,” including some of the Nation’s most contentious civil rights conflicts.

In recent years, however, CRS has faced significant challenges and criticisms. President Trump’s FY 2020 and FY 2021 budget messages to Congress did not include requests for an appropriation for CRS. Instead, the budget requests proposed to “consolidate” CRS’s functions within the Civil Rights Division to “rightsizing the Federal role in local conflict resolutions, while eliminating duplicative functions and improving efficiency” by reducing CRS’s personnel to 15 employees.¹

The FY 2023 federal budget proposal published by the Center for Renewing America (which was led by Russ Vought, director of the Office of Management and Budget in the first Trump Administration and again in the current Administration) called for “full elimination of the ‘equity’ obsessed” and “woke and weaponized” CRS, which the Center viewed to be “driven by race essentialism and radical gender theory—hunting for ‘hate crimes’ defined through the prism of critical race theory and intersectional progressivism.” Asserting that CRS “serves only to perpetuate the continuing efforts of Washington to label citizens as ‘oppressors’ or ‘oppressed,’ . . . tearing apart the civil fabric necessary for a constitutional republic to survive,” the Center proposed “a total defunding” of CRS.²

¹ “A Budget for a Better America, Promises Kept, Taxpayers First, Fiscal Year 2020 Budget of the U.S. Government.” Appendix at 698. <https://www.govinfo.gov/content/pkg/BUDGET-2020-APP/pdf/BUDGET-2020-APP.pdf> (last accessed Feb. 12, 2025).

² Center for Renewing America, “A Commitment to End Woke and Weaponized Government: 2023 Budget Proposal,” at 10, 13. <https://americarenewing.com/wp-content/uploads/2024/03/Budget-Center-for-Renewing->

Similarly, the Republican Study Committee’s FY 2025 budget proposal called for the elimination of CRS because, according to the RSC, CRS “deviates from the core purpose of the DOJ to investigate and prosecute violations of federal law,” but “[i]nstead, the entity attempts to act as ‘peacemaker’ in local disputes and has been used by the Biden Administration to push its woke gender and CRT ideologies.”³ The House’s current marked-up text of the Commerce-Justice-Science (CJS) appropriations bill (which has not had a floor vote yet) has \$0 for CRS. On the other hand, the Senate’s marked-up CJS appropriations bill (which also has not had a floor vote yet) has \$25.0 million allotted for CRS.

In light of these recent calls for defunding and elimination of CRS, the Office of the Associate Attorney General directed me on February 7, 2025 to submit a memo that responds to the criticisms against CRS and identifies avenues of CRS’s contributions under the current Administration.

In response, I provide below an overview CRS’s jurisdictional statutes, a summary of CRS’s core activities, an analysis of the recent criticisms against CRS, and a proposal for CRS’s contributions toward the advancement of the Trump Administration’s peacemaking and public safety goals in the next four years and beyond. Also attached as an appendix to this memo that describes CRS’s current structure and recent staffing and budget history.

II. Overview of CRS’s Jurisdictional Statutes

A. Civil Rights Act of 1964

As the Center for Renewing America correctly notes, CRS “was originally created in Title X of the Civil Rights Act of 1964 as an agency tasked with maintaining dialogue and ensuring a smooth transition out of the era of segregation.”⁴ Conceived to undertake and coordinate mediation and conciliation in explosive situations and tension-torn communities affected by alleged discrimination based on race, color or national origin in public accommodation and other settings, CRS was initially placed in the Commerce Department and was moved to the Justice Department in 1966 through Reorganization Plan of that year. As President Lyndon B. Johnson’s message regarding this reorganization stated, CRS, by being in “closer relationship with the Attorney General and the Civil Rights Division of the Department of Justice, will gain by becoming a primary resource in a coordinated effort in civil rights under the leadership of the Attorney General.”⁵

Under the CRA, the mission of CRS continues to be “to provide assistance to communities and persons therein in resolving disputes, disagreements, or difficulties relating to discriminatory practices based on race, color, or national origin” and restoring “peaceful relations among the citizens of the community involved.” To allow CRS to approach communities in conflict with impartiality and build trusting relationships, the CRA mandated

[America-FY23.pdf](#) (last accessed Feb. 12, 2025). Project 2025, on the other hand, does not contain a reference to CRS.

³ Republic Study Committee, “Fiscal Sanity to Save America: Republic Study Committee FY 2025 Budget Proposal,” at 148. https://hern.house.gov/uploadedfiles/final_budget_including_letter_web_version.pdf (last accessed Feb. 12, 2025).

⁴ “A Commitment to End Woke and Weaponized Government,” at 13.

⁵ 5 U.S.C. App., Reorganization Plan No. 1 of 1966, “Message of the President.”

that CRS conduct “conciliation assistance . . . in confidence and without publicity,” “hold confidential any information acquired in the regular performance of its duties,” and not “engage in the performance of investigative or prosecuting functions of any department or agency in any litigation arising out of a dispute” handled by CRS. Any CRS member who breaks the confidentiality mandate may be prosecuted for a misdemeanor offense under the CRA. 42 U.S.C. 2000g-1, 2000g-2.

In addition, the CRA conferred CRS a role in federal judicial proceedings. The act gave district courts authority to refer parties in CRA public accommodation cases to CRS for CRS to conduct voluntary settlement proceedings with the parties. 42 U.S.C. 2000a-3, 2000a-4.

CRS is also required under the CRA to submit an annual report due to Congress each January 31. 42 U.S.C. 2000g-3.

B. Fair Housing Act of 1968 (and Fair Housing Amendment Act of 1988)

The FHA, which was part of the Civil Rights Act of 1968, recognized CRS’s role in preventing and eliminating discriminatory housing practices, and directed the Secretary of Housing and Urban Development to assist CRS with this work. 42 U.S.C. 3608(e)(4).

C. Church Arson Prevention Act of 1996

The CAPA—which strengthened existing 18 U.S.C. 247 to provide for a more robust protection of religious properties and faith communities from intentional interference of their free exercise of religion and destructive conduct targeting religious properties—directed CRS to “prevent, and respond to potential violations” 18 U.S.C. 247 (damage to religious property and interference with free exercise of religion) and 844 (destructive conduct using fire, bombs, or other explosives). Pub. L. 104-155, Sec. 6.

D. Emmett Till Unsolved Civil Rights Crime Act of 2007 & Emmett Till Unsolved Civil Rights Crimes Reauthorization Act of 2016

The Till Act of 2007, which directed the Civil Rights Division to investigate civil rights era unsolved homicides, mandated CRS (in carrying out the functions described in Title X of the CRA) “to provide technical assistance by bringing together law enforcement agencies and communities in the investigation of violations of criminal civil rights statutes.” Pub. L. 110-344. The Till Reauthorization Act of 2016 further required CRS to “provide technical assistance by bringing together law enforcement agencies and communities to address tensions raised by Civil Rights era crimes.” Pub. L. 114-325, Sec. 2.

E. Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009

Through the HCPA, Congress created a new federal hate crime in 18 U.S.C. 249 (bodily injury or attempted/threatened bodily injury based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability). The HCPA further directed CRS to “prevent and respond to alleged violations” of Section 249.

III. CRS's Core Activities

Guided by the above five jurisdiction-conferring statutes, CRS responds to communities experiencing incidents of mass violence and other deeply divisive conflicts to restore peaceful relations. Working closely with federal, state, tribal, and local governments, law enforcement agencies, religious organizations, community groups, and educational institutions, CRS helps communities to resolve conflicts and disputes through mediation, facilitated dialogue, training, and consultation. CRS provides these services in a neutral and impartial manner only when the parties voluntarily accept CRS's services. As required by the CRA, CRS works under the mandates of confidentiality, non-publicity, and non-involvement in prosecution, litigation, investigation, or enforcement.

CRS's work in communities may fall into three major categories.

First, CRS responds to critical incidents (including high-profile civil rights incidents) to prevent further violence, de-escalate and diffuse community tensions, and offer assistance to government authorities, law enforcement, and communities affected by the incidents. As part of these services, CRS conducts formal mediation and facilitated dialogues among communities in conflict and, in coordination with law enforcement agencies, provides contingency training and event marshal training to groups, among other services.

Second, CRS engages in violence and hate crime prevention services through educational and training programs offered to stakeholders, including victim groups and various civic and community organizations. As part of this prevention work, CRS also conducts facilitated dialogues among communities in conflict and offers public safety consultation services to various institutions to support their capacity building for violence intervention and hate crimes prevention.

Third, CRS provides training and consultation support to federal, state, tribal, and local law enforcement agencies to help officers understand various community groups and religious traditions better and engage with them more effectively in the administration of justice.

IV. Analysis of Recent Criticisms and Challenges

As noted at the outset, the recent challenges to CRS coming with defunding and elimination calls have presented the concerns that CRS's functions are duplicative and inefficient and that CRS is driven by an unconstitutional "woke" ideology on race and sex. With respect, I submit that those characterizations are largely inaccurate, though I acknowledge that certain rebalancing, refocusing, and ameliorative actions may be necessary to better advance CRS's statutory mandates and President Trump's public safety priorities.

First, CRS's functions are not duplicative of any functions currently fulfilled by a Justice Department component. CRS is the sole federal entity that provides public safety mediation, consultation, dialogue facilitation, and training services to state, tribal, and local governments, law enforcement agencies, community groups, religious organizations, and educational institutions. Unlike the Civil Rights Division, U.S. Attorney's Offices, FBI, and other enforcement/investigative/litigating components, CRS is the only component that functions in a neutral and impartial manner to respond to and de-escalate violent and other volatile conflict situations. CRS may appear to fulfill duplicative community event organizing functions that are

also handled by community outreach personnel in CRT, USAOs, and other components. But CRS's community events are methodically designed to address, prevent, and de-escalate actual conflicts in the communities and are tightly connected with CRS's strategic goal of providing mediation and conflict resolution services as a neutral and impartial entity. This is an entirely unique function that CRS performs within the Department in fulfillment of its significant public safety mandates.

Second, CRS is neither a "woke" nor "weaponized" agency that is obsessed with concerns for equity, critical race theory, or gender ideology. CRS does not have either a formal or an informal ideological or political strategy that would be defined as "woke" or unhealthily preoccupied with equity at the expense of other constitutional and democratic values. This criticism largely appears to be a reaction to CRS's work under the HCPA, which requires that CRS "prevent and respond" to alleged hate crime cases involving bodily injury or threatened or attempted bodily injury based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability, as listed in the HCPA. Because the majority of CRS's work in recent years has been under the HCPA and CRS's case work is largely driven by requests for assistance from individuals and communities allegedly victimized under the HCPA, CRS appears to have developed the reputation that it primarily serves and advocates for minority racial and religious communities as well as sexual minorities and disabled persons. Despite CRS's commitment to the statutory mandates of neutrality and impartiality, it may be that individual CRS employees failed to adhere strictly to those mandates and taken on an impermissible posture of advocacy on behalf of minority groups, leading to the unfortunate perception of wokeness.

While I understand and acknowledge how these perceptions may have arisen, I do not believe wholesale defunding or elimination of CRS is warranted. Far from being woke and equity-obsessed, CRS is a collection of mediators and conflict resolution specialists driven by the statutory public safety mission of peacemaking in communities torn by mass violence, religious hatred resulting in damage to and interference with religious properties and free exercise of faith, and other violent hate crimes that result in bodily injuries and even death. Consisting of former law enforcement officers, clergypersons, veterans, prosecutors, and educators, among others, CRS maintains a culture of strong ethical and professional responsibility to ensure that conciliators strictly follow the statutory mandates and strictures in matters involving allegations of discrimination, unlawful bias, hate crimes, and religious and other hate-based violence.

Nonetheless, I recognize that CRS may and should take additional actions to fulfill its mandates in a more balanced manner and to be able to advance effectively President Trump's and Attorney General Pamela Bondi's public safety agenda and priorities.

The actions proposed below are an initial set of recommendations that I believe will allow CRS to contribute more robustly toward the fulfillment of the Administration's peacemaking and public safety goals.

V. Proposals to Promote More Robust Peacemaking by CRS

With the goal of placing CRS in a stronger and more focused position to fulfill its statutory mandates and to maximally advance President Trump's and AG Bondi's priorities, I propose the following actions to rebalance, refocus, and improve CRS's work over the next four years and beyond.

A. Strengthen and Expand CAPA Jurisdictional Work to Respond to Critical Incidents of Violence Involving Explosives

Although since 1996 the Church Arson Prevention Act has allowed CRS to “prevent and respond” to alleged crimes committed under 18 U.S.C. 247 (damage to religious property and interference with free exercise of religion) and 844 (destructive conduct using fire or explosives), CRS in recent years has not yet fully engaged with this mandate.⁶

CRS should engage more strategically and systematically to fulfill CAPA’s mandate to prevent and respond to alleged violations of 18 U.S.C. 844, which CRS has only periodically fulfilled since 1996. Violations of Section 844, which are committed through the use of fire, bombs, and other explosives, often require significant critical incident responses by law enforcement to immediately contain and investigate the public safety concerns posed by the violations. In critical incidents where significant community conflicts are known or anticipated, CRS has a significant role to play in coordination with the Department’s law enforcement components and other agencies. Consistent with the Administration’s public safety and violence prevention/intervention priorities, I recommend that the Department prioritize CRS’s CAPA jurisdictional work to address community conflicts that arise out of Section 844 violations.

CRS already has a Critical Incident Response Toolkit (CIRT) that guides CRS’s work in this area. In recent years, CRS, however, has not consistently engaged in critical incidents of national or regional significance, as the component’s focus has been more on doing preventive and local/regional programmatic training and consultation work under the HCPA. While continuing necessary work under the HCPA to prevent and respond to violent hate crimes, CRS should engage much more intentionally and strategically in responding to significant critical incidents.

When critical incidents occur, CRS’s immediate role is to coordinate with other DOJ components (such as USAOs, CRM, NSD, CRT, FBI, DEA, ATF, and COPS) regarding whether and how CRS can provide assistance and what community engagement and/or service delivery should take place. CRS must also identify which CRS services may be needed within the first 24 hours after the incident; identify who and how many CRS conciliators should be deployed to the affected jurisdiction; communicate with local police chief/sheriff and the mayor, as appropriate; and contact local community leaders (such as, faith leaders, community organizations, school administrators) to understand the immediate issues facing the community and the secondary and tertiary concerns for public safety.

In coordination with other DOJ components, CRS’s continuing role is to determine what additional CRS services are necessary (such as mediation, conciliation, training, and/or facilitated dialogue to community and conflict stakeholders), conduct community outreach to

⁶ In the 1990s, CRS was a member of the National Church Arson Task Force (NCATF) that was chaired by the White House. The NCATF had a three-prong strategy: (1) identify and prosecute the arsonists and other criminals who damaged religious properties; (2) help communities rebuild the damaged churches and other religious structures; and (3) offer local law enforcement assistance in preventing future crimes against religious properties. CRS worked with Christian and other religious leaders to educate them on available resources, communicate and coordinate with law enforcement, and mediate in cases where damages to religious properties led to inter-religious conflicts. The NCATF ended with the close of the Clinton Administration.

On January 29, 2001, President George W. Bush established the White House Faith-Based and Community Initiative, which President Trump renamed as the White House Faith Office on February 7, 2025.

identify and determine whether any of the following groups are involved in the communities' responses to the incident—community and religious organizations, protest groups, social media activists, and potential counter-demonstration groups; continue to identify and connect key conflict stakeholders; identify desired outcomes based on identified conflict (such as, establishing and/or improving police-community dialogues to reduce tension in the community); and coordinate with other relevant DOJ components and other federal agencies (such as, DHS, HUD, DOL, HHS) that are present in the community, when appropriate and in compliance with CRS's confidentiality and other jurisdictional mandates.

Under the leadership and guidance of OAG, ODAG, and OASG, and after further developing and refining CRS's CIRT and deployment principles and criteria, CRS should work in close coordination with relevant DOJ components to provide critically important and necessary peacemaking and violence prevention services in communities affected by mass violence and other major violations of Section 844.

B. Strengthen and Expand CAPA Jurisdictional Work to Protect Religious Communities

Consistent with the Administration's priorities on working with and supporting faith communities, I recommend that the Department prioritize CRS's CAPA jurisdictional work in relation to 18 U.S.C. 247 to provide more robust protections for faith communities and help resolve conflicts that arise among religious communities and between religious groups and secular groups where potential violations of Section 247 is implicated. Leveraging on longstanding relationships with religious communities across the Nation, CRS can and should do much more to promote peace and safety among religious communities that are regularly victimized by vandalism, violent acts, and intimidation.

Currently, in conjunction with USAOs, FBI, DHS's Cybersecurity and Infrastructure Security Agency, and state and local law enforcement agencies, CRS does provide many Protecting Places of Worship forums (PPOWs) with churches, synagogues, mosques, temples, and other places operated by religious communities. In addition, CRS has developed public training programs to combat anti-semitism and promote stronger understanding of and engagement with members of other religious communities such as Muslims, Sikhs, and Hindus. CRS regularly trains law enforcement and different religious communities to promote peaceful relations among them.

At the same time, CRS can engage in much more work among all religious communities, not just among small minority groups, to promote peace and connections among them, by more strategically engaging in outreach to major religious groups with whom CRS has not had significant relationships in recent years. In particular, in conjunction with the Task Force on Combating Anti-Semitism and the Task Force on Eradicating Anti-Christian Bias that President Trump has established, I recommend that CRS work more robustly to educate law enforcement, schools and universities, religious communities, and other community groups regarding the evil of anti-semitism, anti-Christian bias, and other forms of religious hatred and violence. I discuss CRS's proposed involvement with the Administration's major faith initiatives in greater detail below.

C. Help Lead the Administration’s Major Initiatives on and Outreach to Jewish, Christian, and Other Religious Communities in a Fair and Consistent Manner

1. **Center for Faith:** On February 7, 2025, President Trump issued an Executive Order on the Establishment of the White House Faith Office. CRS currently houses the now-renamed Center for Faith for the Justice Department, as we did during the last Administration when the director of the Center was a Schedule C employee who was formerly with the Sikh Coalition. The Center director has been reporting to the CRS director, while also reporting to ODAG and the White House. To my knowledge, the Center director position has not yet been filled by the Trump Administration.

Since January 20, 2025, I, along with another CRS colleague with a religious professional background, have been attending the weekly interagency Centers for Faith meetings and serving as the Center of DOJ point of contact.

I recommend that the Department Leadership keep the Center for Faith in CRS, which, given our longstanding work with religious communities, is the most logical location for the Center within the Department. Building upon my own background in Christian ministry and education (as an ordained pastor and religion professor in Christian colleges), I believe I will be able to work constructively with any Center director who may be appointed. The Center’s continuing placement in CRS will allow CRS to contribute to the President’s agenda more effectively and seamlessly to support “faith-based entities, community organizations, and houses of worship in their efforts to strengthen American families, promote work and self-sufficiency, and protect religious liberty,” which CRS has been doing for the past six decades.

2. **Task Force to Combat Anti-Semitism:** On January 29, 2025, President Trump issued an Executive Order on Additional Measures to Combat Anti-Semitism, which encouraged the Attorney General “to employ appropriate civil-rights enforcement authorities, such as 18 U.S.C. 241, to combat anti-Semitism.” As part of the Department’s fulfillment of the mandate coming from this Executive Order, the Department created an inter-agency Task Force to Combat Anti-Semitism.

I recommend that CRS take a leading role on this Task Force. Under our CAPA and HCPA jurisdictions, CRS has worked closely with Jewish communities to combat anti-semitism, prevent and address violent hate crimes against Jewish communities, and assist synagogues and temples with obtaining training and resources to better protect places of worship and gathering for Jewish communities. Last year, working closely with Anti-Defamation League (ADL), American Jewish Committee (AJC), Hillel, Secure Community Network, United Synagogue of Conservative Judaism, and other major Jewish organizations, CRS completed the development of a community and law enforcement education program called “Understanding and Building Relationships with Jewish Communities” (<https://www.justice.gov/crs/news/combating-antisemitism>), which we successfully piloted in Highland Park, Illinois, in January 2025. Participating in this pilot as co-presenters were representatives from ADL and AJC, with local city leaders, law enforcement officials, faith leaders, and school administrators in attendance praising the program as immensely helpful to combat anti-semitism in their communities. Building on upon this program and our historical close working relationships with Jewish communities throughout the Nation, CRS can take a strong role in fulfilling the President’s goal of combating anti-semitism.

3. **Task Force to Eradicate Anti-Christian Bias:** On February 6, 2025, President Trump issued an Executive Order on Eradicating Anti-Christian Bias. The Order created the Task Force to Eradicate Anti-Christian Bias led by the Attorney General.

I recommend that CRS also take a leading role on this Task Force. Again under our CAPA and HCPA mandates, CRS has worked closely with Christian churches to combat hate and violence against Christian communities. As noted above, through our Protecting Places of Worship forums, CRS has worked very closely with USAOs, FBI, DHS, and other agencies to assist Christian organizations of all denominations and traditions to provide training and resources on better protecting places of worship and combating bias and hate incidents against Christians. For example, in the past two years, CRS worked with the Archdiocese of Baltimore to conduct a PPOW for all 90+ Catholic parishes in the archdiocese. We continue to offer PPOWs and anti-hate crime consultations to Christian congregations throughout the Nation. Building on upon this program and many years of close working relationships with Christian communities throughout the Nation, CRS can take a significant role in fulfilling the President’s goal of eradicating anti-Christian bias.

D. Use CRS’s Expertise in Coordinating Facilitated Dialogues and Mediation to Conduct Public Forums with Victims to Restore a Measure of Justice to the Families of Victims of Commuted Murders

In her February 5, 2025 Memo on Restoring a Measure of Justice to the Families of Victims of Commuted Murderers, AG Bondi directed the Department to “explore opportunities to provide a public forum for the victims’ families to express how the commutations [of death sentences for murderers by President Biden] affected them personally.” I recommend that CRS’s expertise in conducting mediations and facilitated dialogues with communities victimized by violence be utilized to assist the Department in conducting the planned public forums announced in this memo.

* * *

For over 60 years, CRS has faithfully served as America’s unsung Peacemaker and Unifier of American communities—without publicity and bound within the pledge of confidentiality. With a renewed focus on responding to and de-escalating conflicts arising from major critical incidents, a rebalanced and recaptured commitment to fulfilling all of the CAPA jurisdictional mandates, and new opportunities for engaging in leadership and inter-agency collaboration to protect Jewish, Christian, and other religious communities harmed by hate and bias, CRS will make significant contributions to the advancement of the Trump Administration’s goals of fostering peace and safety among communities in conflict, bridging the painful divides in our social fabric, and bringing Americans of all persuasions and backgrounds together in civil and respectful discourse.

CRS can—and I believe should—be a core constituent part of President Trump’s legacy as a peacemaker and a unifier of our Nation and our World.

APPENDIX

CRS’S Current Structure and Recent Staffing and Budget History

A. Current Structure

CRS currently has 57 FTE employees. Among them, 14 are headquarters employees in Washington, D.C. (with offices in 2CON), and 43 are regional employees in field offices throughout the Nation. In addition, CRS’s work is supported by nine contractors from CGI Federal who provide administrative and financial management services.

CRS is headed by a Director who is Presidentially appointed with Senate confirmation (PAS). The CRS Director position is one of five PAS “director” positions in the Justice Department. Second in command is a Deputy Director, which is a general SES position. Both of these top positions are currently vacant. The Associate Director, third in command, is a career GS-15 position, which is held by me. I have been serving as the component head since January 20, 2025. The headquarters office has four units: Administrative/Finance; Legal; Training and Program Development; and Center for Faith. The Center for Faith, which also reports to the White House Faith Office, was placed in CRS in 2024, and is currently covered by me.

CRS’s peacemaking mission is fulfilled primarily by Conciliation Specialists and Lead Conciliation Specialists who work in CRS’s five regions throughout the Nation. Each region is headed by a Regional Director who reports to the Associate Director. The five regions are: Atlantic North, Midwest, Mountain Central, South, and West Regions. Currently, CRS has four Regional Directors and 39 Conciliation Specialists in 27 field offices throughout the Nation.

B. Recent Staffing and Budget History

CRS’s staffing and budget history over the past nine fiscal years is as follows.

Fiscal Year	Year-End Staffing Level	Budget	Note
FY 2017	40 FTE (hiring freeze)	\$15.5 million	
FY 2018	37 FTE (hiring freeze)	\$15.4 million	
FY 2019	32 FTE (hiring freeze)	\$15.5 million	
FY 2020	27 FTE (hiring freeze)	\$16.0 million	For these two years, President Trump requested \$0 for CRS and proposed placement of CRS within CRT with \$5 million and 15 FTE
FY 2021	30 FTE	\$18.0 million	
FY 2022	34 FTE	\$21.0 million	
FY 2023	53 FTE	\$25.0 million	
FY 2024	52 FTE	\$24.0 million	
FY 2025	57 FTE (as of 2/13/2025)	\$29.0 million requested	Marked-Up CJS Bills ⁷ Senate: \$25.0 million; House: \$0

⁷ Congressional Research Service, “Overview of FY2025 Appropriations for Commerce, Justice, Science, and Related Agencies (CJS),” at 11. <https://crsreports.congress.gov/product/pdf/R/R48134/3> (last accessed Feb. 12, 2025).

Produced for Congress

[DATE]

MEMORANDUM FOR COMMUNITY RELATIONS SERVICE EMPLOYEES

FROM: THE ATTORNEY GENERAL

SUBJECT: REAFFIRMING THE MISSION OF THE COMMUNITY RELATIONS SERVICE AND REFOCUSING AND REBALANCING ITS WORK

For more than 60 years, the mission of the Community Relations Service (CRS) has been to promote peace in America's communities divided by conflict and violence. As articulated in the Civil Rights Act of 1964 (CRA) that created the Service, CRS is called upon to restore "peaceful relations" among communities by providing "conciliation assistance" to resolve conflicts. 42 U.S.C. §§ 2000g-1, 2000g-2.

At the heart of CRS's conciliation work are the principles of neutrality, impartiality, and confidentiality. *See* 42 U.S.C. § 2000g-2. As required by the CRA, CRS employees must provide conciliation services as neutral and impartial facilitators of conflict resolution without favoring or advocating for any involved party and without engaging in or appearing to engage in the investigative, prosecutorial, and enforcement functions of the Department. CRS employees must also maintain strict confidentiality of the information they learn in the course of their work as conciliators.

In recent years, however, the focus of CRS's work appears to have deviated away from bringing peaceful resolutions to violent conflict situations and moved too far toward engaging in unnecessary interventions of community tensions that do not require the attention of the Justice Department or devotion of Federal resources. Also, some Americans have come to view CRS as favoring the views and ideologies of one side of volatile issues, thereby failing to live up to the principles of strict neutrality and impartiality that must guide all of CRS's work.

CRS must reaffirm its commitment to fair, neutral, and impartial work of facilitating peace among individuals and communities torn by conflicts and violence. CRS must take immediate and overdue steps to refocus its mission to addressing critical incidents involving violence in American communities and preventing riots, bloodshed, civil disturbances, and other acts of aggression that disturb peace and order.

CRS must also rebalance its work to give appropriate attention to, and allocate resources for, intervention, prevention, and resolution of critical incidents involving violence and

destruction in communities, especially in our Nation’s Christian communities that have endured “an egregious pattern of targeting peaceful Christians, while ignoring violent, anti-Christian offenses,” Executive Order 14202, *Eradicating Anti-Christian Bias*, 90 FR 9365 (Feb. 6, 2025), Jewish communities that have experienced “an unprecedented wave of vile anti-Semitic discrimination, vandalism, and violence,” Executive Order 14188, *Additional Measures To Combat Anti-Semitism*, 90 FR 8847 (Jan. 29, 2025), and other religious communities that have suffered significant damage to their places of worship and interference with their freedom to worship as guaranteed by the First Amendment.

To ensure that CRS fulfills its peacemaking mission in communities that are in greatest need for federal protection, I hereby direct CRS to reaffirm its mission and core principles and refocus and rebalance its work as follows:

1. CRS Must Prioritize Cases That Arise Under the Church Arson Prevention Act to Respond to Critical Incidents and Acts of Violence Against Religious Communities

Although the Church Arson Prevention Act of 1996 (CAPA) authorized CRS to “prevent and respond” to alleged crimes committed under 18 U.S.C. § 247 (damage to religious property and interference with free exercise of religion) and § 844 (destructive conduct using fire and explosives), CRS in recent years has not yet adequately engaged with this mandate.

Consistent with President Trump’s public safety and violence prevention/intervention priorities, CRS must engage strategically and systematically to fulfill CAPA’s mandate to address critical incidents that arise from potential Section 844 violations. As part of this renewed focus, CRS must prioritize CAPA cases to prevent and respond to community conflicts that arise in connection to critical incidents such as mass casualty events, civil disturbances, and any other significant violent or major civil rights incidents that cause or threaten to cause loss of life or injury and/or severe damage to property. Under the direction of the Office of the Deputy Attorney General and the Office of the Associate Attorney General, CRS must work in close coordination with other components to respond to critical incidents and determine whether and how CRS can provide assistance and what community engagement and/or service delivery should take place.

Consistent with the Administration’s priorities to protect faith communities and advance religious liberty, CRS must engage strategically and systematically to fulfill CAPA’s mandate to prevent and respond to assaults on places of worship and free exercise of religion, as they arise from potential Section 247 violations. As part of this renewed focus, CRS must prioritize promotion of robust protections of faith communities and resolution of conflicts that arise among religious communities and between religious groups and other community groups where potential violations of Section 247 are implicated. To advance peace and safety for religious Americans, CRS must build a strong network of partnerships with communities of *all* faiths—not just among minority religious groups.

By the 10th day of each month, CRS must submit to the Office of the Associate Attorney General a comprehensive report of its work that includes the descriptions of and statutory justification for each matter.

2. CRS Must Take a Leading Role in the Department's Fulfillment of President Trump's Faith Initiatives

Since Inauguration Day, President Trump has issued three Executive Orders that signal the Administration's commitment to providing strong protections for religious communities and recognizing the critically important role that faith communities play in our Nation. I am directing CRS to take a leading role, along with the Civil Rights Division, in fulfilling each of these faith initiatives, as well as any additional faith initiative to come.

- **Center for Faith:** On February 7, 2025, President Trump issued an Executive Order on the Establishment of the White House Faith Office. I am directing CRS to continue to house the now-renamed Center for Faith for the Department. The director of the Center for Faith shall report to the Director of CRS, while receiving directions from the White House Faith Office and the Office of the Associate Attorney General. CRS must provide necessary support to, and work in close partnership with, the Center for Faith to “support “faith-based entities, community organizations, and houses of worship in their efforts to strengthen American families, promote work and self-sufficiency, and protect religious liberty.” Executive Order 14205, *Establishment of the White House Faith Office*, 90 FR 9499 (Feb. 7, 2025).
- **Task Force to Combat Anti-Semitism:** On January 29, 2025, President Trump issued Executive Order 14188 to give further direction to the Administration's fight against anti-Semitism. To fulfill the goals of this Executive Order, the Department has created an inter-agency Task Force to Combat Anti-Semitism on February 3, 2025—with the first priority to root out anti-Semitic harassment in schools and on college campuses. I am directing to CRS take a leading role on this Task Force, in close coordination and partnership with the Civil Rights Division. Building on CRS's historical work with Jewish communities and in educational settings, CRS must prioritize its resources to help prevent anti-Semitic harassment and violence, promote safety for synagogues, temples, and Jewish centers of community, and educate the public and civil authorities about the scourge of anti-Semitism—toward fulfilling the President's priority of combating anti-Semitism in America.
- **Task Force to Eradicate Anti-Christian Bias:** On February 6, 2025, President Trump issued Executive Order 14202 to eradicate Anti-Christian bias. The Order created the Task Force to Eradicate Anti-Christian Bias to be chaired by the Attorney General. I am directing CRS, working in close coordination and partnership with the Civil Rights Division, to support my Office in leading this inter-agency Task Force. Building upon CRS's work under CAPA and the Hate Crimes Prevention Act, CRS must prioritize its resources to fulfill the President's goal of eradicating anti-Christian bias by helping to prevent acts of hostility and vandalism against Christian churches, schools, and community centers, sharing information and developing strategies to protect the religious liberties of Americans, and educating the public about the evils of anti-Christian bias.

3. CRS Must Use Its Expertise in Coordinating Facilitated Dialogues and Mediation to Conduct Public Forums with Victims of Crimes

In my February 5, 2025 Memo to the Department on Restoring a Measure of Justice to the Families of Victims of Commuted Murderers, I directed the Department to “explore opportunities to provide a public forum for the victims’ families to express how the commutations [of death sentences for murderers by President Biden] affected them personally.” Building upon its expertise in conducting mediations and facilitated dialogues in communities in experiencing pain, I am directing CRS to develop a plan for the public forums envisioned in my Restoring a Measure of Justice memo and lead the Department’s efforts in conducting the public forums. CRS must present a proposed plan for the public forums within 30 days of this memorandum.



**U.S. Department of Justice
Community Relations Service**

Washington, DC 20530

DATE: March 7, 2025
TO: Justice Management Division
FROM: Julius Nam, Associate Director & Component Head, CRS
RE: Community Relations Service Agency RIF and Reorganization Plan, Phase 1

I. CRS's Public Safety Responsibilities

The Community Relations Service (CRS) is a public safety component that should not be fully subject to the Workforce Optimization Initiative announced in President Trump's Executive Order *Implementing The President's "Department of Government Efficiency" Workforce Optimization Initiative* ("Executive Order") and the Guidance on Agency RIF and Reorganization Plans ("ARRP Guidance") provided by the Office of Management and Budget and the Office of Personnel Management.

The Executive Order provides in Section 3(c), which addresses "Reduction in Force" measures that agencies must undertake, that the "subsection shall not apply to functions related to public safety, immigration enforcement, or law enforcement" (emphasis added). Consistent with the Executive Order, the ARRP Guidance provides in Section VI (Exclusions) that "[n]othing in this memorandum shall have any application to: 1. Positions that are necessary to meet law enforcement, border security, national security, immigration enforcement, or public safety responsibilities."

CRS's public safety responsibilities are evident from its establishing statute and subsequent statutes that have heightened its public safety mandates. Since its establishment through Title X of the Civil Rights Act of 1964, CRS has been mandated to intervene with and de-escalate violence and threats of violence in situations where "peaceful relations among the citizens of the community involved" are threatened by some of the Nation's most contentious and violent conflicts. In 1996, CRS's jurisdiction was significantly expanded by the Church Arson Prevention Act, which directed CRS to prevent and respond to violations of federal criminal statutes that prohibit (a) destructive conduct using fire, bombs, or other explosives (18 U.S.C. § 844), and (b) damage to religious properties and interference with the free exercise of religion (18 U.S.C. § 247). In 2009, Congress further expanded CRS's jurisdiction with the passage of the Hate Crimes Prevention Act to prevent and respond to situations where alleged assailants caused, or threatened or attempted to cause, bodily injury upon victims bearing protected traits under the Act (18 U.S.C. § 249).

In recognition of CRS's public safety mandate, the Department's FY 2019 and 2020 Agency Contingency Plan, submitted to OMB on September 11, 2018 and August 1, 2019,

respectively, stated identically that “CRS provides critical assistance in resolving and preventing racial, ethnic and national origin community conflicts, violence, and civil disorder, and it helps communities struggling to recover in the aftermath of alleged violent hate crimes.” Thus, in the event of a lapse in appropriations, “[a] minimum number of employees are necessary to provide a rapid response to emergency situations to protect the safety of human life or the protection of property.” As the ARRP Guidance recognizes, these “functions that are excepted from the Antideficiency Act (ADA) in the Agency Contingency Plans submitted to OMB in 2019” offer an important dividing line between functions and positions that are subject to RIF and those that are not.

Accordingly, given that CRS serves an important and necessary public safety function in relation to “community conflicts, violence, and civil disorder,” as well as “violent hate crimes” (as recognized in the Department’s FY 2019-20 Agency Contingency Plans), most positions in CRS should be recognized as exempt from RIF in the ARRP for the Department. Nonetheless, CRS applies the ARRP Guidance’s principles to CRS to recommend avenues of achieving better service for the American people, increased productivity, a significant reduction in the number of full-time equivalent (“FTE”) positions, a reduced real property footprint, and reduced budget topline.

II. The ARRP for CRS

Below, CRS provides component-specific responses to the ARRP Guidance’s eight questions for consideration in Phase 1 of RIF and Reorganization, focusing on initial component cuts and reductions.

- 1. A list of agency subcomponents or offices that provide direct services to citizens. Such subcomponents or offices should be included in ARRPs to improve services to citizens while eliminating costs and reducing the size of the federal government. But for service delivery subcomponents or offices, implementation shall not begin until certified by OMB and OPM as resulting in a positive effect on the delivery of such services.**

CRS is a direct services component that works not only with federal, state, tribal, and local government agencies and law enforcement partners, but also directly with religious communities, civic organizations, educational institutions, and individual citizens and community groups that seek CRS’s services. CRS responds to those requests by offering, as necessary and appropriate, conflict resolution and de-escalation services through mediation, facilitation of dialogue, consultation and technical assistance, and training.

CRS’s delivery of direct services to citizens and communities throughout the United States takes place through the 25 field offices that are organized into five regions. Apart from the field offices in Atlanta, Los Angeles, and New York City where CRS has three employees each, the remaining 22 field offices have only 1 or 2 employees in each office. Each field office, which is more than 50 miles from every other field office, constitutes a competitive area (upon application of the “Competitive Areas for Reduction in Force” guidance provided by the Department’s Chief Human Capital Officer on February 28, 2025). Each field office covers multiple federal Congressional and judicial districts and provides, as needed in coordination with U.S. Attorney’s Offices and other law enforcement agencies, rapid response to offer critical assistance to communities to protect human life and property—in emergency situations involving

violent conflicts and civil disorder. CRS is already at a near-minimum level of personnel while continuing to provide necessary direct services in a productive manner to citizens and communities. Below, CRS provides recommendations toward eliminating costs and reducing the size of CRS while maintaining strong, productive services to citizens and communities.

- 2. Any statutes that establish the agency, or subcomponents of the agency, as statutorily required entities. Agency leadership must confirm statutes have not been interpreted in a way that expands requirements beyond what the statute actually requires. Instead, statutes should be interpreted to cover only what functions they explicitly require.**

Five statutes confer jurisdiction upon CRS. CRS was established by Title X of the Civil Rights Act of 1964, 42 U.S.C. § 2000g, *et seq.* (“CRA”). The Fair Housing Act of 1968 (which was amended by the Fair Housing Amendment Act of 1988) (“FHA”), the Church Arson Prevention Act of 1996 (“CAPA”), the Emmett Till Unsolved Civil Rights Crime Act of 2007 (which was reauthorized under the Emmett Till Unsolved Civil Rights Crimes Reauthorization Act of 2016) (“Emmett Till Act”), and the Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009 (“HCPA”) have expanded CRS’s jurisdiction to intensify CRS’s public safety mandates. As described below, CRS’s statutory mandates under these statutes are clear and explicit, which CRS has carefully interpreted in a way that does not expand requirements beyond what the statute actually requires. CRS stays within its functions as specifically required by the jurisdictional statutes in providing conciliation, prevention, and response services to citizens and communities experiencing conflicts.

CRA: Under the CRA, the mission of CRS is “to provide assistance to communities and persons therein in resolving disputes, disagreements, or difficulties relating to discriminatory practices based on race, color, or national origin” and to restore “peaceful relations among the citizens of the community involved.” 42 U.S.C. § 2000g-1. To allow CRS to approach communities in conflict with impartiality and build trusting relationships, the CRA mandated that CRS conduct “conciliation assistance . . . in confidence and without publicity,” “hold confidential any information acquired in the regular performance of its duties,” and not “engage in the performance of investigative or prosecuting functions of any department or agency in any litigation arising out of a dispute” handled by CRS. Any CRS member who breaks the confidentiality mandate may be prosecuted for a federal misdemeanor offense under the CRA. 42 U.S.C. §§ 2000g-1, 2000g-2. In addition, the CRA conferred CRS a mediating role in federal judicial proceedings. The Act gave district courts authority to refer parties in CRA public accommodation cases to CRS for settlement proceedings during which CRS is authorized to “make a full investigation of any complaint referred to it by the court under [42 U.S.C. § 2000a-3(d)] and may hold such hearings . . . to bring about a voluntary settlement between the parties.” 42 U.S.C. §§ 2000a-3, 2000a-4.

FHA: The FHA recognizes CRS’s conflict resolution and prevention role in the housing discrimination context, and directs the Secretary of Housing and Urban Development to “cooperate with and render such technical and other assistance to” CRS “to further its activities in preventing or eliminating discriminatory housing practices” that violate 42 U.S.C. §§ 3604, 3605, 3606, 3617. 42 U.S.C. § 3608(e)(4).

CAPA: The CAPA strengthened existing 18 U.S.C. § 247 to provide for a more robust protection of religious properties and free exercise of religion, as well as protection from

destructive conduct targeting religious properties and communities. CAPA directs CRS to “prevent, and respond to potential violations” of 18 U.S.C. § 247 (damage to religious property and interference with free exercise of religion) and § 844 (destructive conduct using fire, bombs, or other explosives).

Emmett Till Act: The 2007 Emmett Till Act requires CRS “to provide technical assistance by bringing together law enforcement agencies and communities in the investigation of violations of criminal civil rights statutes,” as such violations that resulted in death are being investigated by the Civil Rights Division (“CRT”) and the Federal Bureau of Investigation (“FBI”). Pub. L. 110-344, § 6(b). In reauthorizing the Emmett Till Act in 2016, Congress further required CRT, FBI, and CRS to hold regular meetings with various stakeholders to “discuss the status of the Department’s work under this Act.” Congress then further directed CRS to “provide technical assistance by bringing together law enforcement agencies and communities to address tensions raised by Civil Rights era crimes.” Pub. L. 114-325, § 2.

HCPA: In enacting the HCPA, Congress created a new federal hate crime statute in 18 U.S.C. § 249 (bodily injury or attempted/threatened bodily injury based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability). In connection with the HCPA, Congress increased CRS’s funding for additional personnel and directed CRS to “prevent and respond to alleged violations” of 18 U.S.C. § 249. Pub. L. 111-84, §§ 4706, 4707.

3. All agency components and employees performing functions not mandated by statute or regulation who are not typically designated as essential during a lapse in appropriations (because the functions performed by such employees do not fall under an exception to the ADA) using the Agency Contingency Plans submitted to OMB in 2019.

As noted above, CRS performs significant public safety functions mandated by five jurisdictional statutes to address conflicts arising from violations of various federal criminal and civil laws. Moreover, as the Department’s Agency Contingency Plan submitted to OMB on August 1, 2019 recognized: “CRS provides critical assistance in resolving and preventing racial, ethnic and national origin community conflicts, violence, and civil disorder, and it helps communities struggling to recover in the aftermath of alleged violent hate crimes.” In the event of a lapse in appropriations, “[a] minimum number of employees are necessary to provide a rapid response to emergency situations to protect the safety of human life or the protection of property.”

Although CRS is already operating at a near-minimum level, far below the Congressionally authorized FTE of 98, this ARRP proposes a 25% overall reduction of FTE from 57 and a 34% reduction of the number of field offices from 29 field offices—between February 11, 2025 (the date of the Executive Order) and the date of the implementation of the ARRP. That would be achieved through the anticipated reduction of 15 employees and elimination of 10 field offices total, as described below.

On February 11, 2025, CRS had 57 FTE employees and 29 field offices. Since then, in response to the President’s Workplace Optimization Initiative, two have resigned, and five are participating in the Deferred Resignation Program (“DRP”)—representing a 7% reduction of seven employees and elimination of three field offices.

Among the remaining 50 FTE employees, 14 FTE employees are in the Washington, D.C., headquarters office, and 36 FTE employees work out of 25 field offices throughout the United States. The 36 employees in field offices represent a near-minimum level necessary to provide rapid responses to emergency situations arising in different parts of the Nation, in fulfillment of CRS's statutory mandates. To be able to deploy quickly and effectively to critical incidents and emergency public safety situations, CRS's field staff needs to maintain strategic presence throughout the United States. Thus, CRS believes not more than a reduction of six field office employees—who would be considered essential in the event of a lapse in appropriations—would be appropriate as part of the Department's RIF process. CRS anticipates being able to achieve a reduction of six field office employees through consolidation of field offices—resulting in the elimination of seven additional field offices. In all, this ARRP would reduce CRS's real property footprint by 10 field offices, a 34% reduction.

In addition, CRS anticipates a reduction of two employees from the Washington, D.C., headquarters office to reach a total of 15 FTE reductions since February 11, 2025. Although CRS's headquarters staff (14 FTE total currently) would not be designated as essential during a lapse in appropriations, the current staffing level is at a near-minimum: management (1 FTE); administrative/HR/security (1 supervisory FTE; 1 staff FTE); travel/HR support (1 FTE); Finance (1 FTE); legal (1 general counsel FTE); FOIA (1 FTE); program development (3 FTE); case management (2 FTE); and information systems and technology/website management (1 FTE)—each of whom is necessary to support effective service delivery and maximum productivity for CRS's public safety direct services mandate to citizens and communities throughout the United States. Nonetheless, CRS estimates it will be able to reduce its headquarters staff by two positions to reach a total of 15 FTE reduction since February 11, 2025—representing a total reduction of 25% in personnel.

4. Whether the agency or any of its subcomponents should be eliminated or consolidated; and which specific subcomponents or functions, if any, should be expanded to deliver on the President's priorities.

CRS should not be eliminated. Instead, even as the number of CRS employees is reduced, its functions should continue to be actively realigned to support the President's and the Attorney General's agendas, and selected functions of CRS should, in fact, be expanded to deliver on the President's priorities.

CRS's mission is critical to the success of the President's priorities to promote peacemaking and reconciliation¹ in American communities and to combat violent crimes, anti-semitism, and anti-Christian bias, among other acts of hate. Thus, CRS's statutory mandates and expertise of prevention and response to violent acts of hate, interference with free exercise of religion rights, and violent and destructive conduct involving explosives should lead to an expansion of CRS's functions to include heightened working relationships with the Department's violence intervention initiatives, Joint Terrorism Task Forces throughout the Nation, the newly established Task Force on Combating Anti-Semitism, the newly established Task Force on Eradicating Anti-Christian Bias, and the Department's planned public forums with families of victims of murders committed by individuals whose federal death sentences were commuted by

¹ President Donald J. Trump, Inaugural Address, Jan. 20, 2025 (“*My proudest legacy will be that of a peacemaker and unifier. That’s what I want to be: a peacemaker and a unifier.*”), <https://www.whitehouse.gov/remarks/2025/01/the-inaugural-address/> (last accessed Mar. 7, 2025).

President Biden. In addition, the Department should leverage CRS's broad and active relationships with state, tribal, and local civic and law enforcement authorities as well as faith, civic, and community groups to partner with those entities to advance the President's and the Attorney General's priorities in new and innovative ways.

As for any potential consolidation of CRS with another component, CRS recognizes that President Trump's FY 2020 and FY 2021 budget requests to Congress proposed to consolidate CRS's functions within the Civil Rights Division.² Placement of CRS within CRT may lead to additional significant reductions in the number of FTE positions from CRS. Given the close relationship between CRS and CRT under the CRA, the Emmett Till Act, and the HCPA, as well as CRT's leading roles in implementing the Administration's priorities for faith-related work, placement of CRS in CRT could have the benefit of bringing together the two components with connected equities and creating synergy to engage coherently and comprehensively in the prevention, intervention, enforcement, prosecution, and community outreach spaces regarding civil rights violations and hate crimes.

If the Department places CRS under either CRT, several of CRS's functions—such as the administrative, HR, security, travel, finance, legal, FOIA, communications, IT, program development, and case management functions, as well as one or two management positions—may be consolidated with similar functions currently existing in CRT.

One area of significant concern for consolidation with CRT, however, would be that CRS's placement within CRT, a criminal and civil enforcement component, will likely lead to confusion and disbelief regarding CRS's confidentiality, non-enforcement, and non-investigative mandates under the CRA. For example, stakeholders and complainants may be less inclined to seek CRS's services with CRS's reporting line being placed within a litigating/enforcement division of the Department. Also, if the Department were to implement place CRS within CRT, the White House may need to submit a Reorganization Plan, as required by the Reorganization Act of 1977, 5 U.S.C. § 903(a)(3). Moreover, a revision of the Civil Rights Act of 1964 may be necessary to make explicit CRS's placement in CRT and the reporting line of the CRS Director (a Presidentially appointed, Senate confirmed position) to the Attorney General through the Assistant Attorney General for Civil Rights. See below for additional discussions on this.

5. The specific tools the agency intends to use to achieve efficiencies, including, as to each, the number of FTEs reduced and any potential savings or costs associated with such actions in Fiscal Years 2025, 2026 and 2027.

In FY 2024, Congress authorized a total of 98 FTE for CRS, and the previous Administration requested 118 FTE for FY 2025. As of February 1, 2025, however, CRS only had 57 FTE, which has since February 11, 2025 been reduced to 50 FTE.

As detailed above, CRS believes a 25% reduction in FTE from 57 FTE to 42 FTE (between February 11, 2025 and the date of the implementation of the ARRP) and a 34% reduction of field offices would be appropriate. Already, seven employees have resigned or are being placed on administrative leave as part of their participation in the DRP. As a result, three field offices have already been eliminated.

² "A Budget for a Better America, Promises Kept, Taxpayers First, Fiscal Year 2020 Budget of the U.S. Government." Appendix at 698. <https://www.govinfo.gov/content/pkg/BUDGET-2020-APP/pdf/BUDGET-2020-APP.pdf> (last accessed Feb. 12, 2025).

In addition, CRS believes it will be able to reduce the total number of FTEs by additional eight employees and seven field offices through a combination of tools listed below. This decrease of FTE from 98, as currently authorized by Congress, to 42 would represent a 57% reduction.

If CRS's FTE were to remain steady at 42, the annual budget for Fiscal Years 2025, 2026, and 2027 could remain at or about \$20 million each year with some accounting for inflation. In Fiscal Years 2023 and 2024, CRS had the following FTE and appropriations from Congress—FY 2023: 53 FTE, \$25 million; FY 2024: 52 FTE, \$24 million. With the anticipated reduction in force and the measures identified below, CRS expects to be able to maintain its annual expenditures at or below \$20 million, representing 17% savings from FY 2024 appropriations.

The specific tools that CRS would use to achieve greater efficiencies are:

- a. Continuation of the current hiring freeze;
- b. Regular attrition (e.g., retirement, movement between agencies and the private sector);
- c. Participation in the Voluntary Early Retirement Authority, if approved;
- d. Attrition through enhanced policies governing employee performance and conduct;
- e. Attrition through termination of probationary employees who do not meet performance standards;
- f. Attrition through reduction of field offices;
- g. Attrition through partial consolidation of the five regions;
- h. Reassignment of headquarters staff to other components of the Department, as appropriate;
- i. Elimination of at least one management position (Deputy Director (SES general) and/or Associate Director); and
- j. Relocation of the Director of Center for Faith position to another component in the Department.

6. A list by job position of all positions categorized as essential for purposes of exclusion from large-scale RIFs, including the number per each job position and total by agency and subcomponent.

The job positions in CRS that should be categorized as essential are the conciliation specialist, lead conciliation specialist, regional director, associate director, and director positions. These are positions that enable CRS to provide “critical assistance in resolving and preventing racial, ethnic and national origin community conflicts, violence, and civil disorder,” and are “necessary to provide a rapid response to emergency situations to protect the safety of human life or the protection of property,” as provided in the Department’s Agency Contingency Plan for 2019. The number per job position is as follows:

- Conciliation Specialist: 25
- Lead Conciliation Specialist: 6
- Regional Director: 3
- Associate Director: 1
- Director (Presidentially Appointed, Senate Confirmed): 1

7. The agency’s suggested plan for congressional engagement to gather input and agreement on major restructuring efforts and the movement of fundings between accounts, as applicable, including compliance with any congressional notification requirements.

If the Department were to place CRS within CRT or another component, the Administration may need to transmit a Reorganization Plan to Congress, as required by the Reorganization Act of 1977, 5 U.S.C. § 903(a)(3) (requiring transmission of a reorganization plan to Congress for “the consolidation or coordination of the whole or a part of an agency, or of the whole or a part of the functions thereof, with the whole or a part of another agency or the functions thereof”).

That would be consistent with the steps taken by the White House in 1966 when CRS was transferred from the Commerce Department to the Justice Department through the submission of Reorganization Plan No. 1 of 1966 under the Reorganization Act of 1949. When submitting that Plan, President Johnson explained in his accompanying message to Congress that “[t]he Attorney General will provide for the organization of the Community Relations Service as a separate unit within the Department of Justice.”

Moreover, a revision of Title X of the Civil Rights Act of 1964, which established CRS and the office of the Director of CRS as a Presidentially appointed, Senate confirmed position, may be necessary to make explicit CRS’s placement in CRT and the reporting line of the CRS Director to the Attorney General through the Assistant Attorney General for Civil Rights.³

8. The agency’s timetable and plan for implementing each part of its Phase 1 ARRP.

CRS is prepared to follow the timetable as set by the Department.

³ Placement of a Justice Department subcomponent headed by a director who is to be Presidentially appointed and Senate confirmed has precedent in the Office of Justice Programs (“OJP”). Until 2012, the Omnibus Crime Control and Safe Streets Act of 1968, the Juvenile Justice and Delinquency Prevention Act of 1974, and the Victims of Crime Act of 1984 placed—within OJP—the Bureau of Justice Statistics (42 U.S.C. § 3732(b)), the Bureau of Justice Assistance (42 U.S.C. § 3741(b)), the National Institute of Justice (42 U.S.C. § 3722(b)), the Office of Juvenile Justice and Delinquency Prevention (42 U.S.C. § 5611(b)), and the Office for Victims of Crime (42 U.S.C. § 10605(b)), while requiring that the Directors of BJS, BJA, NIJ, and OVC, and the Administrator of OJJDP, be Presidentially appointed and Senate confirmed. Each statute, however, made explicit that the head of each component placed within OJP report to the Attorney General *through* the AAG for OJP.



U.S. Department of Justice
Community Relations Service

Washington, DC 20530

DATE: March 24, 2025
TO: Justice Management Division
FROM: Julius Nam, Associate Director & Component Head, CRS
RE: Community Relations Service Agency RIF and Reorganization Plan, Phase 2

As directed by the “Guidance on Agency RIF and Reorganization Plans” (“ARRP Guidance”) issued by the Office of Management and Budget (“OMB”) and the Office of Personnel Management (“OPM”) to effectuate President Trump’s Executive Order *Implementing The President’s “Department of Government Efficiency” Workforce Optimization Initiative* (“Executive Order”), the Community Relations Service (“CRS”) offers its “Phase 2” ARRP below for implementation through September 30, 2025—with the goal of presenting “a positive vision for more productive, efficient agency operations going forward.” As required by the ARRP Guidance and the Justice Management Division (“JMD”), CRS submitted its Phase 1 plan on March 7, 2025, which is attached to this memorandum as Appendix 1.

Applying the “Principles to Inform ARRPs” and “Available Tools” for implementation provided in the ARRP Guidance, this memorandum responds to the 17 questions presented in the “Phase 2” section of the ARRP Guidance.

1. The agency’s proposed future-state organizational chart with its functional areas, consolidated management hierarchy, and position titles and counts clearly depicted.

CRS’s current organization chart was issued by then-Attorney General Eric Holder on May 16, 2013. (See Appendix 2.) That chart is now outdated and requires a significant update.

Attached as Appendix 3 is CRS’s proposed “future-state organizational chart,” which presents three levels of vertical structures for the three key areas of CRS’s work: Administration; Operations; and Legal. The three levels consist of (1) the Director (Presidentially Appointed, Senate confirmed); (2) two Deputy Directors and General Counsel who would report directly to the Director; and (3) the Administrative and Finance Staff who would report to the Deputy Director for Administration; the Field Staff and the Program Staff who would report to the Deputy Director for Operations; and the Legal Staff who would report to the General Counsel.

The proposed organizational chart reflects significant changes to the current chart. Notably, CRS proposes to convert the Deputy Director (general SES) position into a GS-15 position as Deputy Director for Administration, who would continue to report to the Director and supervise the

administrative and finance staff. CRS also proposes to change the Associate Director (GS-15) position (currently one level below the Deputy Director position) to a second Deputy Director (GS-15) position as the Deputy Director for Operations, who would report directly to the Director and supervise the field staff and the program staff. The General Counsel (GS-15) position replaces the Senior Counsel and Attorney Advisor positions, which separately but directly report to the Director currently. The General Counsel would continue to report to the Director and supervise the legal staff.

As directed in the ARRP Guidance, the proposed “future-state” organizational chart in Appendix 3 includes specific position titles and the number of employees projected to occupy each position upon implementation of the ARRP for CRS.

2. Confirmation that the agency has reviewed all personnel data, including each employee’s official position description, four most recent performance ratings of record, retention service computation date, and veterans’ preference status.

CRS has reviewed all personnel data as directed above and provided the required information to the Justice Management Division (“JMD”).

3. The agency’s plan to ensure that employees are grouped, to the greatest extent possible, based on like duties and job functions to promote effective collaboration and management, and that the agency’s real estate footprint is aligned with cross-agency efforts coordinated by GSA to establish regional federal office hubs.

Summary of CRS’s Phase 1 ARRP

On March 7, 2025, CRS submitted its Phase 1 ARRP to JMD. That ARRP may be summarized as follows:

- Staffing and Office Location Status on February 11, 2025 (Executive Order date)
 - FTE: 57
 - Field Offices: 30
- Reduction Through Immediate Resignation and Deferred Resignation Program (“DRP”)
 - FTE: 7 (2 are immediate; 5 are through the DRP)
 - Field Offices: 4
- Staffing and Office Location Status on March 7, 2025 (Phase 1 ARRP submission date)
 - FTE: 50 (14 in CRS headquarters; 36 in field offices)
 - Field Offices: 26
- Proposed CRS ARRP, Phase 1, on March 7, 2025
 - FTE: Additional reduction of **8 FTE (2 FTE from headquarters; 6 FTE from field offices)** to reach **42 FTE total** by September 30, 2025. This would represent an overall **25%** reduction of personnel since February 11, 2025.
 - Field Offices: Additional reduction of **6 offices** to reach **20 offices total** by September 30, 2025. This would represent an overall **33%** reduction of CRS’s footprint since February 11, 2025.

Implementation of the Proposed Phase 1 ARRP

The proposed reduction in CRS’s Phase 1 ARRP may be achieved as follows—through September 30, 2025.

- **Headquarters: Reduction of 2 positions**
 - Reduction of 1 position from the National Program Manager (“NPM”) positions.
 - Currently, one (1) employee occupies an NPM (GS-15) position. The NPM position is designed to employ subject matter experts of national renown to provide leadership on specific areas of CRS’s significant focus. The only currently filled NPM position is for CRS’s work in the Muslim, Arab, Sikh, South Asian, and Hindu (“MASSAH”) Communities. Although the MASSAH communities are important stakeholders to CRS, devoting NPM resources only on these communities presents an imbalance of focus. CRS believes it will be able to distribute the responsibility to engage with the MASSAH communities among the regions, as CRS’s field staff and program staff should be able to provide sufficient coverage, guided by the Administration/Department/CRS’s priorities, to meet the needs that arise from those communities.
 - Reduction of 1 position from the Training and Program Development (“TPD”) Team.
 - Currently, CRS’s TPD team consists of employees who (a) develop and help deliver internal and outward-facing programs, (b) serve the component’s communications, public affairs, cybersecurity, and information technology needs, and (b) work on CRS’s case management system and data analysis. Although each member of this team handles a critically important task, CRS would be able to reduce this team by one (1) position while maintaining effective collaboration and management of the team.
- **Field Offices: Reduction of seven (6) offices and six (6) FTE positions from CRS’s five (5) regions**
 - Atlantic North Region (CT, DC, DE, MA, MD, ME, NH, NJ, NY, NY, PA, PR, RI, VA, VI, VT, WV): Elimination of two (2) field office and two (2) FTE positions
 - Currently, this region has six (6) field offices and nine (9) FTE positions (not including the two (2) FTE participating in the DRP).
 - CRS proposes to eliminate one (1) field office and two (2) FTE positions from the Atlantic North Region.
 - This proposal would lead to this region having five (5) field offices and seven (7) FTE positions.
 - Midwest Region (IA, IL, IN, KS, MO, MI, MN, NE, OH, WI): Elimination of one (1) field office and one (1) FTE position
 - Currently, this region has five (5) field offices and seven (7) FTE positions (not including the one (1) FTE participating in the DRP).
 - CRS proposes to eliminate one (1) field office and one (1) FTE position from this region.
 - This proposal would lead to this region having four (4) field offices and six (6) FTE positions.
 - Mountain Central Region (AR, AZ, CO, MT, ND, NM, OK, SD, TX, UT, WY): Elimination of one (1) field office and one (1) FTE position
 - Currently, this region has five (5) offices and six (6) employees (with zero (0) employees participating in the DRP).

- CRS proposes to eliminate one (1) field office and one (1) FTE position from this region.
- This proposal would lead to this region having four (4) field offices and five (5) FTE positions.
- South Region (AL, FL, GA, KY, LA, MS, NC, SC, TN): Elimination of one (1) field office and one (1) FTE position
 - Currently, this region has five (5) offices and eight (8) employees (with zero (0) employees participating in the DRP).
 - CRS proposes to eliminate one (1) field office and one (1) FTE position from this region.
 - This proposal would lead to this region having four (4) field offices and seven (7) FTE positions.
- West Region (AK, AS, CA, GU, HI, ID, NV, OR, WA): Elimination of two (2) field offices and one (1) FTE position
 - Currently, this region has four (4) offices and six (6) employees (not including the one (1) FTE participating in the DRP).
 - CRS proposes to eliminate two (2) field offices (as one field office currently remains unoccupied by a federal employee) and one (1) FTE position from this region.
 - This proposal would lead to this region having two (2) field offices and five (5) FTE positions.
- **Outcome**
 - As detailed above, CRS proposes to achieve an additional reduction of eight (8) FTE positions and six (6) field offices through the implementation of the ARRP.
 - In sum, between February 11, 2025 and September 30, 2025, CRS would reduce its FTE numbers from 57 to 42 (a reduction of 15 FTE positions) and its field office locations from 30 to 20 (a reduction of 10 offices).
 - At the same time, although the ARRP outlines the target numbers of field office closures and FTE reductions for CRS’s headquarters office and field offices, CRS hopes to have the flexibility to achieve the reductions by either strategically eliminating positions, adjusting the precise number of reductions from each of CRS’s five regions (depending on how the implementation of the ARRP unfolds), adjusting for unanticipated attritions, and adapting to the changing needs and compositions of the regions. In the end, CRS intends to reach the same number of overall reductions.¹
 - In sum, CRS trusts these reductions—achieved by applying OPM’s RIF policy in a balanced and fair manner throughout the component’s headquarters and regions—will continue to promote effective collaboration and management within the headquarters office and each region.
Moreover, CRS believes maintaining the current pattern of field office distributions in the regions—while reducing the component’s real estate footprint by one-third (33%) and continuing to work with JMD’s Facilities and Administrative Services Staff (“FASS”) for efficient use of Department and Federal space resources—will achieve maximum efficiency in office space usage, while staying close to population centers to maintain CRS’s ability to provide

¹ On March 24, 2025, the date of the submission of this memo, CRS received one (1) FTE employee on reassignment from the Office on Violence Against Women. CRS is placing that employee in the TPD team. Although neither this memo nor CRS’s March 7, 2025 memo takes into account the addition of this new employee, CRS is committed to reaching the same total number of reductions of FTE positions during the RIF process.

immediate response to critical jurisdictional incidents and major crises that occur in communities.

4. Any proposed relocations of agency bureaus and offices from Washington, D.C. and the National Capital Region to less-costly parts of the country.

CRS does not propose relocation of its Washington, D.C., headquarters office, which currently has 14 FTE and, after the RIF process, would have 12 FTE. These positions fulfill the following functions: management; administration/HR/security; travel/HR support; finance; legal/FOIA management; program development; case management; and information systems and technology/website management. CRS deems these functions are best fulfilled from a D.C. location, given the need for leadership, and cross-component coordination and collaboration for the fulfillment of those functions.

5. The competitive areas for subsequent large-scale RIFs.

Per the “Competitive Areas for Reduction in Force” memorandum (“Competitive Areas memo”) issued by the Department’s Chief Human Capital Officer on February 28, 2025, “[t]he headquarters organization of the Community Relations Service is a separate competitive area.”

As for CRS’s field offices, CRS believes the best application of the guidance provided in the Competitive Areas memo is to construe each of the five CRS regions as a single competitive area.² The five Regions are: Atlantic North Region; Midwest Region; Mountain Central Region; South Region; and West Region. Each Region is supervised by a Regional Director or an Acting Regional Director and has 4-7 field offices where 6-9 employees work. Upon the implementation of the ARRP, each region would have 2-4 offices staffed by 5-7 employees.

Each region fits the description of a competitive area as provided in the Competitive Areas memo because it is “independent of other [regions] in operation and work function and in which employees are assigned under a single administrative authority.” A CRS field office (where we typically have 1-2 employees) is more than 50 miles away from every other field office, but functionally, all field office employees work under the single administrative authority of a Regional Director and function as a single unit to cover jurisdictional matters arising from the states within the region.

Thus, there are six competitive areas within CRS:

1. Headquarters
2. Atlantic North Region
3. Midwest Region
4. Mountain Central Region
5. South Region
6. West Region

² In CRS’s March 7, 2025 memo, we made the initial analysis that each of the 30 field offices, staffed mostly by 1-2 employees, constitutes a competitive area. Upon further analysis and consideration of how each field office works within each region, we continue to maintain that a region is best viewed to be a competitive area.

6. All reductions, including FTE positions, term and temporary positions, reemployed annuitants, real estate footprint, and contracts that will occur in relation to the RIFs.

As detailed above in response to Item #3, CRS anticipates reaching an overall reduction of fifteen (15) FTE positions and ten (10) field offices by September 30, 2025, including the resignations and deferred resignations that have occurred since February 11, 2025. Included in the 15 FTE and 10 field office reductions are eight (8) additional FTE positions and six (6) additional field offices proposed for reduction in the ARRP. None of the 15 FTE reductions occupy term positions or are reemployed annuitants.

As for CRS's real estate footprint, CRS anticipates that the ten (10) field offices to be removed from our footprint will consist of approximately five (5) offices for which CRS is making lease payments and five (5) offices currently located within U.S. Attorney's Offices without any payment. CRS estimates annual cost savings of approximately \$350,000-400,000 (based on FY 2025 amounts) from concluding approximately five field office contracts and associated GSA vehicle leases.

As for contracts in relation to RIFs, CRS anticipates achieving a reduction of up to 50%, in keeping with the reduction in field staff, by September 30, 2025. CRS currently participates in the Justice Department's contract with CGI Federal, which supplies CRS with eight (8) contractors. In FY 2025, CRS anticipates spending approximately \$907,000 in salaries for those contractors. Among them, four (4) contractors work in the regions, serving as administrative assistants. Although they fulfill important supporting functions for the regions, CRS believes the field staff will be able to absorb many, or possibly all, those functions, allowing for the termination of the CGI contracts for up to four (4) contractors in the regions. As for the four (4) CGI contractors who work in CRS's headquarters office, they fulfill such duties as financial management, case management, legal work, and key administrative support. CRS views each of those headquarters roles fulfilled by CGI contractors to be mission-critical and does not propose to terminate those contracts. Loss of the headquarters contractors will likely lead to a significant impairment in CRS's ability to provide assistance to the mission-critical work of CRS effectively.

7. Any components absorbing functions, including how this will be achieved in terms of FTE positions, funding, and space.

CRS does not anticipate absorbing functions of other components. All the absorption of functions will be internal to CRS, as described in detail above.

8. The agency's internal processes that ensure agency leadership has visibility and/or direct sign-off on all potential job offers and candidates prior to extending offers.

CRS's established process for consideration of job candidates and potential job offers, as outlined in CRS Standard Operating Procedure 2.1 (Recruitment and Selection) ensures that the component leadership has both visibility and direct sign-off on all decisions. The CRS Director, or the official performing component head duties, must be directly involved in each hiring decision. In turn, as has been the rule, the CRS director or component head will continue to obtain approval of all job offer decisions from the Associate Attorney General through JMD.

9. The agency's data-driven plan to ensure new career appointment hires are in highest-need areas and adhere to the general principle that, subject to appropriate exemptions, no more than one employee should be hired for every four employees that depart. Until the agency has finalized its post-hiring-freeze plan, agencies should continue to adhere to the current hiring freeze.

To ensure that new career appointments are made in the areas with the greatest need, CRS will undertake a comprehensive regional assessment of jurisdictional cases and community needs, taking into account Federal Bureau of Investigation and U.S. Sentencing Commission crime statistics related to CRS's jurisdictional statutes. This will involve analyzing case data from the past three years, particularly focusing on instances where staff availability may have limited our ability to effectively respond to jurisdictional cases. Additionally, CRS will assess communities that have not traditionally received as much support due to staffing constraints. Our post-hiring-freeze plan will incorporate these findings to strategically allocate resources where they are most needed and no more than one employee will be hired for every four employees that depart.

10. Any provisions of collective bargaining agreements that would inhibit government efficiency and cost-savings, and agency plans to renegotiate such provisions.

None of CRS's employees are parties to collective bargaining agreements.

11. An explanation of how the ARRP will improve services for Americans and advance the President's policy priorities.

CRS's ARRP offers strategic steps designed to enhance the efficiency and effectiveness of our services while advancing the President's policy priorities and will improve services for Americans. By streamlining operations, CRS can reallocate resources to areas of higher need, ensuring that our services are delivered more effectively and consistently. This plan will allow CRS to reduce operational costs, improve responsiveness; and enhance our ability to accomplish mission critical work and to support communities that require more immediate attention. For example, centralizing field offices will foster better collaboration and communication among staff, leading to quicker decision-making and more coordinated efforts across teams and response time. Additionally, by focusing on optimizing CRS staffing levels, we can ensure that critical roles are filled where they will have the most significant impact, ultimately strengthening CRS's service delivery and aligning with the President's long-term goals.

12. The framework and criteria the agency has used to define and determine efficient use of existing personnel and funds to improve services and the delivery of these services.

CRS is a component currently composed of 50 employees. CRS measures efficient use of personnel and funds by (1) the effective and speedy delivery of conciliation services by CRS's five regions in response to critical incidents, significant violations of jurisdictional statutes, and community requests for jurisdictional conflict resolution; and (2) the effective leadership, counsel, program and training, and administrative and financial support provided by the headquarters office to the regions.

To ensure CRS's ability to maintain efficient use of personnel and funds for effective regional and headquarters functions, the proposed ARRP distributes reductions evenly and strategically throughout the five regions and the headquarters office. Thus, the ARRP keeps 2-4 field offices

in each of the five regions and 5-7 employees in each region, who will be supported by 12 employees total in the headquarters office, plus the Director who may be appointed by the President and confirmed by the Senate.

13. For agencies that provide direct services to citizens (such as Social Security, Medicare, and veterans' health care), the agency's certification that implementation of the ARRP will have a positive effect on the delivery of such services. The certification should include a written explanation from the Agency Head and, where appropriate, the agency's CIO and any relevant program manager.

CRS will ensure that the implementation of the proposed ARRP, which includes field office consolidations and reductions in force, will positively impact the delivery of services to communities. By centralizing CRS employees within their respective regions, the plan will enhance operational efficiency and improve the coordination of services. This strategic alignment will not impede CRS's ability to deploy to communities as required; rather, it will optimize resource allocation, ensuring more timely and effective service delivery to meet the needs of the communities.

14. The programs and agency components not impacted by the ARRP, and the justification for any exclusion.

CRS is participating in and thus impacted by the ARRP.

15. Plans to reduce costs and promote efficiencies through improved technology, including through the adoption of new software or systems, and elimination of duplicative systems.

CRS proposes implementing a series of strategic initiatives that will help streamline operations, reduce on unnecessary expenses, and improve overall accessibility, all while positioning the component for long-term success.

Invest in Software for In-House Communication Materials:

CRS recommends purchasing industry-standard software such as Adobe InDesign and Canva to enhance the creation of communication materials (e.g., flyers, brochures, training materials, etc.). By adopting these tools and providing the necessary training to our current employees, the need for external contractors (that CRS has traditionally used in the past) will be eliminated, enabling CRS to produce high-quality marketing and communication materials in-house. This shift will allow for greater creative flexibility and governmental control, significantly reduce outsourcing costs, and improve turnaround times, enabling faster responses to communications needs.

Enhance Virtual Service Delivery:

CRS recommends enhancing our ability to offer virtual delivery for many of our outward-facing programs and services. This shift will reduce costs associated with staff travel and logistics while enhancing accessibility for community stakeholders. Virtual service delivery platforms, such as Zoom or Microsoft Teams, will allow us to efficiently connect with clients and provide services remotely, reducing the need for in-person meetings. In addition to broader access to services and lower travel expenses, the benefits include the ability to maintain continuity of operations during unforeseen disruptions, such as inclement weather.

Develop Web-Based Trainings:

CRS recommends investing in the development of web-based training programs using platforms such as Articulate 360, Moodle, and Google Classroom. Articulate 360 allows for the creation of engaging, interactive eLearning courses, while Moodle and Google Classroom offer robust platforms for hosting and managing online learning content. These platforms will provide scalable, self-paced learning opportunities for both staff and external community stakeholders. The initial software costs will be outweighed by the long-term benefits, including a reduction in the need for in-person training sessions, savings on travel expenses, and the ability to track and measure learner progress more effectively.

16. Any changes to regulations and agency policies, including changes that must be pursued through notice-and-comment rulemaking, that would lead to the reduction or elimination of agency subcomponents, or speed up implementation of ARRPs.

CRS is not aware of any changes to statutes, regulations, or policies that would be required to implement the ARRPs.

A significant reduction of CRS's capacity, however, may run counter to the Congressional intent expressed in CRS's jurisdictional statutes. Five statutes confer jurisdiction upon CRS. CRS was established by Title X of the Civil Rights Act of 1964, 42 U.S.C. § 2000g, *et seq.* The Fair Housing Act of 1968 (which was amended by the Fair Housing Amendment Act of 1988), the Church Arson Prevention Act of 1996, the Emmett Till Unsolved Civil Rights Crime Act of 2007 (which was reauthorized under the Emmett Till Unsolved Civil Rights Crimes Reauthorization Act of 2016), and the Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009 have expanded CRS's jurisdiction to intensify CRS's public safety mandates.

If the Department decides to place CRS within another component (as addressed in the March 7, 2025 memo), the Department should consider the potential need to submit a Reorganization Plan to Congress, as required by the Reorganization Act of 1977, 5 U.S.C. § 903(a)(3). Moreover, a revision of the Civil Rights Act of 1964 may be necessary to make explicit CRS's placement in another component and the reporting line of the CRS Director (a Presidentially appointed, Senate confirmed position) to the Attorney General through another PAS position.

17. The agency's timetable and plan for implementing each part of its Phase 2 ARRPs, and its plan for monitoring and accountability in implementing its ARRPs.

CRS is prepared to follow the timetable and plan for monitoring and accountability to be set by the Department.

Appendix 1:

Community Relations Service Agency RIF and Reorganization Plan, Phase 1

March 7, 2025

Produced for Congress



**U.S. Department of Justice
Community Relations Service**

Washington, DC 20530

DATE: March 7, 2025
TO: Justice Management Division
FROM: Julius Nam, Associate Director & Component Head, CRS
RE: Community Relations Service Agency RIF and Reorganization Plan, Phase 1

I. CRS's Public Safety Responsibilities

The Community Relations Service (CRS) is a public safety component that should not be fully subject to the Workforce Optimization Initiative announced in President Trump's Executive Order *Implementing The President's "Department of Government Efficiency" Workforce Optimization Initiative* ("Executive Order") and the Guidance on Agency RIF and Reorganization Plans ("ARRP Guidance") provided by the Office of Management and Budget and the Office of Personnel Management.

The Executive Order provides in Section 3(c), which addresses "Reduction in Force" measures that agencies must undertake, that the "subsection shall not apply to functions related to public safety, immigration enforcement, or law enforcement" (emphasis added). Consistent with the Executive Order, the ARRP Guidance provides in Section VI (Exclusions) that "[n]othing in this memorandum shall have any application to: 1. Positions that are necessary to meet law enforcement, border security, national security, immigration enforcement, or public safety responsibilities."

CRS's public safety responsibilities are evident from its establishing statute and subsequent statutes that have heightened its public safety mandates. Since its establishment through Title X of the Civil Rights Act of 1964, CRS has been mandated to intervene with and de-escalate violence and threats of violence in situations where "peaceful relations among the citizens of the community involved" are threatened by some of the Nation's most contentious and violent conflicts. In 1996, CRS's jurisdiction was significantly expanded by the Church Arson Prevention Act, which directed CRS to prevent and respond to violations of federal criminal statutes that prohibit (a) destructive conduct using fire, bombs, or other explosives (18 U.S.C. § 844), and (b) damage to religious properties and interference with the free exercise of religion (18 U.S.C. § 247). In 2009, Congress further expanded CRS's jurisdiction with the passage of the Hate Crimes Prevention Act to prevent and respond to situations where alleged assailants caused, or threatened or attempted to cause, bodily injury upon victims bearing protected traits under the Act (18 U.S.C. § 249).

In recognition of CRS's public safety mandate, the Department's FY 2019 and 2020 Agency Contingency Plan, submitted to OMB on September 11, 2018 and August 1, 2019,

respectively, stated identically that “CRS provides critical assistance in resolving and preventing racial, ethnic and national origin community conflicts, violence, and civil disorder, and it helps communities struggling to recover in the aftermath of alleged violent hate crimes.” Thus, in the event of a lapse in appropriations, “[a] minimum number of employees are necessary to provide a rapid response to emergency situations to protect the safety of human life or the protection of property.” As the ARRP Guidance recognizes, these “functions that are excepted from the Antideficiency Act (ADA) in the Agency Contingency Plans submitted to OMB in 2019” offer an important dividing line between functions and positions that are subject to RIF and those that are not.

Accordingly, given that CRS serves an important and necessary public safety function in relation to “community conflicts, violence, and civil disorder,” as well as “violent hate crimes” (as recognized in the Department’s FY 2019-20 Agency Contingency Plans), most positions in CRS should be recognized as exempt from RIF in the ARRP for the Department. Nonetheless, CRS applies the ARRP Guidance’s principles to CRS to recommend avenues of achieving better service for the American people, increased productivity, a significant reduction in the number of full-time equivalent (“FTE”) positions, a reduced real property footprint, and reduced budget topline.

II. The ARRP for CRS

Below, CRS provides component-specific responses to the ARRP Guidance’s eight questions for consideration in Phase 1 of RIF and Reorganization, focusing on initial component cuts and reductions.

- 1. A list of agency subcomponents or offices that provide direct services to citizens. Such subcomponents or offices should be included in ARRPs to improve services to citizens while eliminating costs and reducing the size of the federal government. But for service delivery subcomponents or offices, implementation shall not begin until certified by OMB and OPM as resulting in a positive effect on the delivery of such services.**

CRS is a direct services component that works not only with federal, state, tribal, and local government agencies and law enforcement partners, but also directly with religious communities, civic organizations, educational institutions, and individual citizens and community groups that seek CRS’s services. CRS responds to those requests by offering, as necessary and appropriate, conflict resolution and de-escalation services through mediation, facilitation of dialogue, consultation and technical assistance, and training.

CRS’s delivery of direct services to citizens and communities throughout the United States takes place through the 25 field offices that are organized into five regions. Apart from the field offices in Atlanta, Los Angeles, and New York City where CRS has three employees each, the remaining 22 field offices have only 1 or 2 employees in each office. Each field office, which is more than 50 miles from every other field office, constitutes a competitive area (upon application of the “Competitive Areas for Reduction in Force” guidance provided by the Department’s Chief Human Capital Officer on February 28, 2025). Each field office covers multiple federal Congressional and judicial districts and provides, as needed in coordination with U.S. Attorney’s Offices and other law enforcement agencies, rapid response to offer critical assistance to communities to protect human life and property—in emergency situations involving

violent conflicts and civil disorder. CRS is already at a near-minimum level of personnel while continuing to provide necessary direct services in a productive manner to citizens and communities. Below, CRS provides recommendations toward eliminating costs and reducing the size of CRS while maintaining strong, productive services to citizens and communities.

- 2. Any statutes that establish the agency, or subcomponents of the agency, as statutorily required entities. Agency leadership must confirm statutes have not been interpreted in a way that expands requirements beyond what the statute actually requires. Instead, statutes should be interpreted to cover only what functions they explicitly require.**

Five statutes confer jurisdiction upon CRS. CRS was established by Title X of the Civil Rights Act of 1964, 42 U.S.C. § 2000g, *et seq.* (“CRA”). The Fair Housing Act of 1968 (which was amended by the Fair Housing Amendment Act of 1988) (“FHA”), the Church Arson Prevention Act of 1996 (“CAPA”), the Emmett Till Unsolved Civil Rights Crime Act of 2007 (which was reauthorized under the Emmett Till Unsolved Civil Rights Crimes Reauthorization Act of 2016) (“Emmett Till Act”), and the Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009 (“HCPA”) have expanded CRS’s jurisdiction to intensify CRS’s public safety mandates. As described below, CRS’s statutory mandates under these statutes are clear and explicit, which CRS has carefully interpreted in a way that does not expand requirements beyond what the statute actually requires. CRS stays within its functions as specifically required by the jurisdictional statutes in providing conciliation, prevention, and response services to citizens and communities experiencing conflicts.

CRA: Under the CRA, the mission of CRS is “to provide assistance to communities and persons therein in resolving disputes, disagreements, or difficulties relating to discriminatory practices based on race, color, or national origin” and to restore “peaceful relations among the citizens of the community involved.” 42 U.S.C. § 2000g-1. To allow CRS to approach communities in conflict with impartiality and build trusting relationships, the CRA mandated that CRS conduct “conciliation assistance . . . in confidence and without publicity,” “hold confidential any information acquired in the regular performance of its duties,” and not “engage in the performance of investigative or prosecuting functions of any department or agency in any litigation arising out of a dispute” handled by CRS. Any CRS member who breaks the confidentiality mandate may be prosecuted for a federal misdemeanor offense under the CRA. 42 U.S.C. §§ 2000g-1, 2000g-2. In addition, the CRA conferred CRS a mediating role in federal judicial proceedings. The Act gave district courts authority to refer parties in CRA public accommodation cases to CRS for settlement proceedings during which CRS is authorized to “make a full investigation of any complaint referred to it by the court under [42 U.S.C. § 2000a-3(d)] and may hold such hearings . . . to bring about a voluntary settlement between the parties.” 42 U.S.C. §§ 2000a-3, 2000a-4.

FHA: The FHA recognizes CRS’s conflict resolution and prevention role in the housing discrimination context, and directs the Secretary of Housing and Urban Development to “cooperate with and render such technical and other assistance to” CRS “to further its activities in preventing or eliminating discriminatory housing practices” that violate 42 U.S.C. §§ 3604, 3605, 3606, 3617. 42 U.S.C. § 3608(e)(4).

CAPA: The CAPA strengthened existing 18 U.S.C. § 247 to provide for a more robust protection of religious properties and free exercise of religion, as well as protection from

destructive conduct targeting religious properties and communities. CAPA directs CRS to “prevent, and respond to potential violations” of 18 U.S.C. § 247 (damage to religious property and interference with free exercise of religion) and § 844 (destructive conduct using fire, bombs, or other explosives).

Emmett Till Act: The 2007 Emmett Till Act requires CRS “to provide technical assistance by bringing together law enforcement agencies and communities in the investigation of violations of criminal civil rights statutes,” as such violations that resulted in death are being investigated by the Civil Rights Division (“CRT”) and the Federal Bureau of Investigation (“FBI”). Pub. L. 110-344, § 6(b). In reauthorizing the Emmett Till Act in 2016, Congress further required CRT, FBI, and CRS to hold regular meetings with various stakeholders to “discuss the status of the Department’s work under this Act.” Congress then further directed CRS to “provide technical assistance by bringing together law enforcement agencies and communities to address tensions raised by Civil Rights era crimes.” Pub. L. 114-325, § 2.

HCPA: In enacting the HCPA, Congress created a new federal hate crime statute in 18 U.S.C. § 249 (bodily injury or attempted/threatened bodily injury based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability). In connection with the HCPA, Congress increased CRS’s funding for additional personnel and directed CRS to “prevent and respond to alleged violations” of 18 U.S.C. § 249. Pub. L. 111-84, §§ 4706, 4707.

3. All agency components and employees performing functions not mandated by statute or regulation who are not typically designated as essential during a lapse in appropriations (because the functions performed by such employees do not fall under an exception to the ADA) using the Agency Contingency Plans submitted to OMB in 2019.

As noted above, CRS performs significant public safety functions mandated by five jurisdictional statutes to address conflicts arising from violations of various federal criminal and civil laws. Moreover, as the Department’s Agency Contingency Plan submitted to OMB on August 1, 2019 recognized: “CRS provides critical assistance in resolving and preventing racial, ethnic and national origin community conflicts, violence, and civil disorder, and it helps communities struggling to recover in the aftermath of alleged violent hate crimes.” In the event of a lapse in appropriations, “[a] minimum number of employees are necessary to provide a rapid response to emergency situations to protect the safety of human life or the protection of property.”

Although CRS is already operating at a near-minimum level, far below the Congressionally authorized FTE of 98, this ARRP proposes a 25% overall reduction of FTE from 57 and a 34% reduction of the number of field offices from 29 field offices—between February 11, 2025 (the date of the Executive Order) and the date of the implementation of the ARRP. That would be achieved through the anticipated reduction of 15 employees and elimination of 10 field offices total, as described below.

On February 11, 2025, CRS had 57 FTE employees and 29 field offices. Since then, in response to the President’s Workplace Optimization Initiative, two have resigned, and five are participating in the Deferred Resignation Program (“DRP”)—representing a 7% reduction of seven employees and elimination of three field offices.

Among the remaining 50 FTE employees, 14 FTE employees are in the Washington, D.C., headquarters office, and 36 FTE employees work out of 25 field offices throughout the United States. The 36 employees in field offices represent a near-minimum level necessary to provide rapid responses to emergency situations arising in different parts of the Nation, in fulfillment of CRS's statutory mandates. To be able to deploy quickly and effectively to critical incidents and emergency public safety situations, CRS's field staff needs to maintain strategic presence throughout the United States. Thus, CRS believes not more than a reduction of six field office employees—who would be considered essential in the event of a lapse in appropriations—would be appropriate as part of the Department's RIF process. CRS anticipates being able to achieve a reduction of six field office employees through consolidation of field offices—resulting in the elimination of seven additional field offices. In all, this ARRP would reduce CRS's real property footprint by 10 field offices, a 34% reduction.

In addition, CRS anticipates a reduction of two employees from the Washington, D.C., headquarters office to reach a total of 15 FTE reductions since February 11, 2025. Although CRS's headquarters staff (14 FTE total currently) would not be designated as essential during a lapse in appropriations, the current staffing level is at a near-minimum: management (1 FTE); administrative/HR/security (1 supervisory FTE; 1 staff FTE); travel/HR support (1 FTE); Finance (1 FTE); legal (1 general counsel FTE); FOIA (1 FTE); program development (3 FTE); case management (2 FTE); and information systems and technology/website management (1 FTE)—each of whom is necessary to support effective service delivery and maximum productivity for CRS's public safety direct services mandate to citizens and communities throughout the United States. Nonetheless, CRS estimates it will be able to reduce its headquarters staff by two positions to reach a total of 15 FTE reduction since February 11, 2025—representing a total reduction of 25% in personnel.

4. Whether the agency or any of its subcomponents should be eliminated or consolidated; and which specific subcomponents or functions, if any, should be expanded to deliver on the President's priorities.

CRS should not be eliminated. Instead, even as the number of CRS employees is reduced, its functions should continue to be actively realigned to support the President's and the Attorney General's agendas, and selected functions of CRS should, in fact, be expanded to deliver on the President's priorities.

CRS's mission is critical to the success of the President's priorities to promote peacemaking and reconciliation¹ in American communities and to combat violent crimes, anti-semitism, and anti-Christian bias, among other acts of hate. Thus, CRS's statutory mandates and expertise of prevention and response to violent acts of hate, interference with free exercise of religion rights, and violent and destructive conduct involving explosives should lead to an expansion of CRS's functions to include heightened working relationships with the Department's violence intervention initiatives, Joint Terrorism Task Forces throughout the Nation, the newly established Task Force on Combating Anti-Semitism, the newly established Task Force on Eradicating Anti-Christian Bias, and the Department's planned public forums with families of victims of murders committed by individuals whose federal death sentences were commuted by

¹ President Donald J. Trump, Inaugural Address, Jan. 20, 2025 (“*My proudest legacy will be that of a peacemaker and unifier. That’s what I want to be: a peacemaker and a unifier.*”), <https://www.whitehouse.gov/remarks/2025/01/the-inaugural-address/> (last accessed Mar. 7, 2025).

President Biden. In addition, the Department should leverage CRS's broad and active relationships with state, tribal, and local civic and law enforcement authorities as well as faith, civic, and community groups to partner with those entities to advance the President's and the Attorney General's priorities in new and innovative ways.

As for any potential consolidation of CRS with another component, CRS recognizes that President Trump's FY 2020 and FY 2021 budget requests to Congress proposed to consolidate CRS's functions within the Civil Rights Division.² Placement of CRS within CRT may lead to additional significant reductions in the number of FTE positions from CRS. Given the close relationship between CRS and CRT under the CRA, the Emmett Till Act, and the HCPA, as well as CRT's leading roles in implementing the Administration's priorities for faith-related work, placement of CRS in CRT could have the benefit of bringing together the two components with connected equities and creating synergy to engage coherently and comprehensively in the prevention, intervention, enforcement, prosecution, and community outreach spaces regarding civil rights violations and hate crimes.

If the Department places CRS under either CRT, several of CRS's functions—such as the administrative, HR, security, travel, finance, legal, FOIA, communications, IT, program development, and case management functions, as well as one or two management positions—may be consolidated with similar functions currently existing in CRT.

One area of significant concern for consolidation with CRT, however, would be that CRS's placement within CRT, a criminal and civil enforcement component, will likely lead to confusion and disbelief regarding CRS's confidentiality, non-enforcement, and non-investigative mandates under the CRA. For example, stakeholders and complainants may be less inclined to seek CRS's services with CRS's reporting line being placed within a litigating/enforcement division of the Department. Also, if the Department were to implement place CRS within CRT, the White House may need to submit a Reorganization Plan, as required by the Reorganization Act of 1977, 5 U.S.C. § 903(a)(3). Moreover, a revision of the Civil Rights Act of 1964 may be necessary to make explicit CRS's placement in CRT and the reporting line of the CRS Director (a Presidentially appointed, Senate confirmed position) to the Attorney General through the Assistant Attorney General for Civil Rights. See below for additional discussions on this.

5. The specific tools the agency intends to use to achieve efficiencies, including, as to each, the number of FTEs reduced and any potential savings or costs associated with such actions in Fiscal Years 2025, 2026 and 2027.

In FY 2024, Congress authorized a total of 98 FTE for CRS, and the previous Administration requested 118 FTE for FY 2025. As of February 1, 2025, however, CRS only had 57 FTE, which has since February 11, 2025 been reduced to 50 FTE.

As detailed above, CRS believes a 25% reduction in FTE from 57 FTE to 42 FTE (between February 11, 2025 and the date of the implementation of the ARRP) and a 34% reduction of field offices would be appropriate. Already, seven employees have resigned or are being placed on administrative leave as part of their participation in the DRP. As a result, three field offices have already been eliminated.

² "A Budget for a Better America, Promises Kept, Taxpayers First, Fiscal Year 2020 Budget of the U.S. Government." Appendix at 698. <https://www.govinfo.gov/content/pkg/BUDGET-2020-APP/pdf/BUDGET-2020-APP.pdf> (last accessed Feb. 12, 2025).

In addition, CRS believes it will be able to reduce the total number of FTEs by additional eight employees and seven field offices through a combination of tools listed below. This decrease of FTE from 98, as currently authorized by Congress, to 42 would represent a 57% reduction.

If CRS's FTE were to remain steady at 42, the annual budget for Fiscal Years 2025, 2026, and 2027 could remain at or about \$20 million each year with some accounting for inflation. In Fiscal Years 2023 and 2024, CRS had the following FTE and appropriations from Congress—FY 2023: 53 FTE, \$25 million; FY 2024: 52 FTE, \$24 million. With the anticipated reduction in force and the measures identified below, CRS expects to be able to maintain its annual expenditures at or below \$20 million, representing 17% savings from FY 2024 appropriations.

The specific tools that CRS would use to achieve greater efficiencies are:

- a. Continuation of the current hiring freeze;
- b. Regular attrition (e.g., retirement, movement between agencies and the private sector);
- c. Participation in the Voluntary Early Retirement Authority, if approved;
- d. Attrition through enhanced policies governing employee performance and conduct;
- e. Attrition through termination of probationary employees who do not meet performance standards;
- f. Attrition through reduction of field offices;
- g. Attrition through partial consolidation of the five regions;
- h. Reassignment of headquarters staff to other components of the Department, as appropriate;
- i. Elimination of at least one management position (Deputy Director (SES general) and/or Associate Director); and
- j. Relocation of the Director of Center for Faith position to another component in the Department.

6. A list by job position of all positions categorized as essential for purposes of exclusion from large-scale RIFs, including the number per each job position and total by agency and subcomponent.

The job positions in CRS that should be categorized as essential are the conciliation specialist, lead conciliation specialist, regional director, associate director, and director positions. These are positions that enable CRS to provide “critical assistance in resolving and preventing racial, ethnic and national origin community conflicts, violence, and civil disorder,” and are “necessary to provide a rapid response to emergency situations to protect the safety of human life or the protection of property,” as provided in the Department’s Agency Contingency Plan for 2019. The number per job position is as follows:

- Conciliation Specialist: 25
- Lead Conciliation Specialist: 6
- Regional Director: 3
- Associate Director: 1
- Director (Presidentially Appointed, Senate Confirmed): 1

7. The agency’s suggested plan for congressional engagement to gather input and agreement on major restructuring efforts and the movement of fundings between accounts, as applicable, including compliance with any congressional notification requirements.

If the Department were to place CRS within CRT or another component, the Administration may need to transmit a Reorganization Plan to Congress, as required by the Reorganization Act of 1977, 5 U.S.C. § 903(a)(3) (requiring transmission of a reorganization plan to Congress for “the consolidation or coordination of the whole or a part of an agency, or of the whole or a part of the functions thereof, with the whole or a part of another agency or the functions thereof”).

That would be consistent with the steps taken by the White House in 1966 when CRS was transferred from the Commerce Department to the Justice Department through the submission of Reorganization Plan No. 1 of 1966 under the Reorganization Act of 1949. When submitting that Plan, President Johnson explained in his accompanying message to Congress that “[t]he Attorney General will provide for the organization of the Community Relations Service as a separate unit within the Department of Justice.”

Moreover, a revision of Title X of the Civil Rights Act of 1964, which established CRS and the office of the Director of CRS as a Presidentially appointed, Senate confirmed position, may be necessary to make explicit CRS’s placement in CRT and the reporting line of the CRS Director to the Attorney General through the Assistant Attorney General for Civil Rights.³

8. The agency’s timetable and plan for implementing each part of its Phase 1 ARRP.

CRS is prepared to follow the timetable as set by the Department.

³ Placement of a Justice Department subcomponent headed by a director who is to be Presidentially appointed and Senate confirmed has precedent in the Office of Justice Programs (“OJP”). Until 2012, the Omnibus Crime Control and Safe Streets Act of 1968, the Juvenile Justice and Delinquency Prevention Act of 1974, and the Victims of Crime Act of 1984 placed—within OJP—the Bureau of Justice Statistics (42 U.S.C. § 3732(b)), the Bureau of Justice Assistance (42 U.S.C. § 3741(b)), the National Institute of Justice (42 U.S.C. § 3722(b)), the Office of Juvenile Justice and Delinquency Prevention (42 U.S.C. § 5611(b)), and the Office for Victims of Crime (42 U.S.C. § 10605(b)), while requiring that the Directors of BJS, BJA, NIJ, and OVC, and the Administrator of OJJDP, be Presidentially appointed and Senate confirmed. Each statute, however, made explicit that the head of each component placed within OJP report to the Attorney General *through* the AAG for OJP.

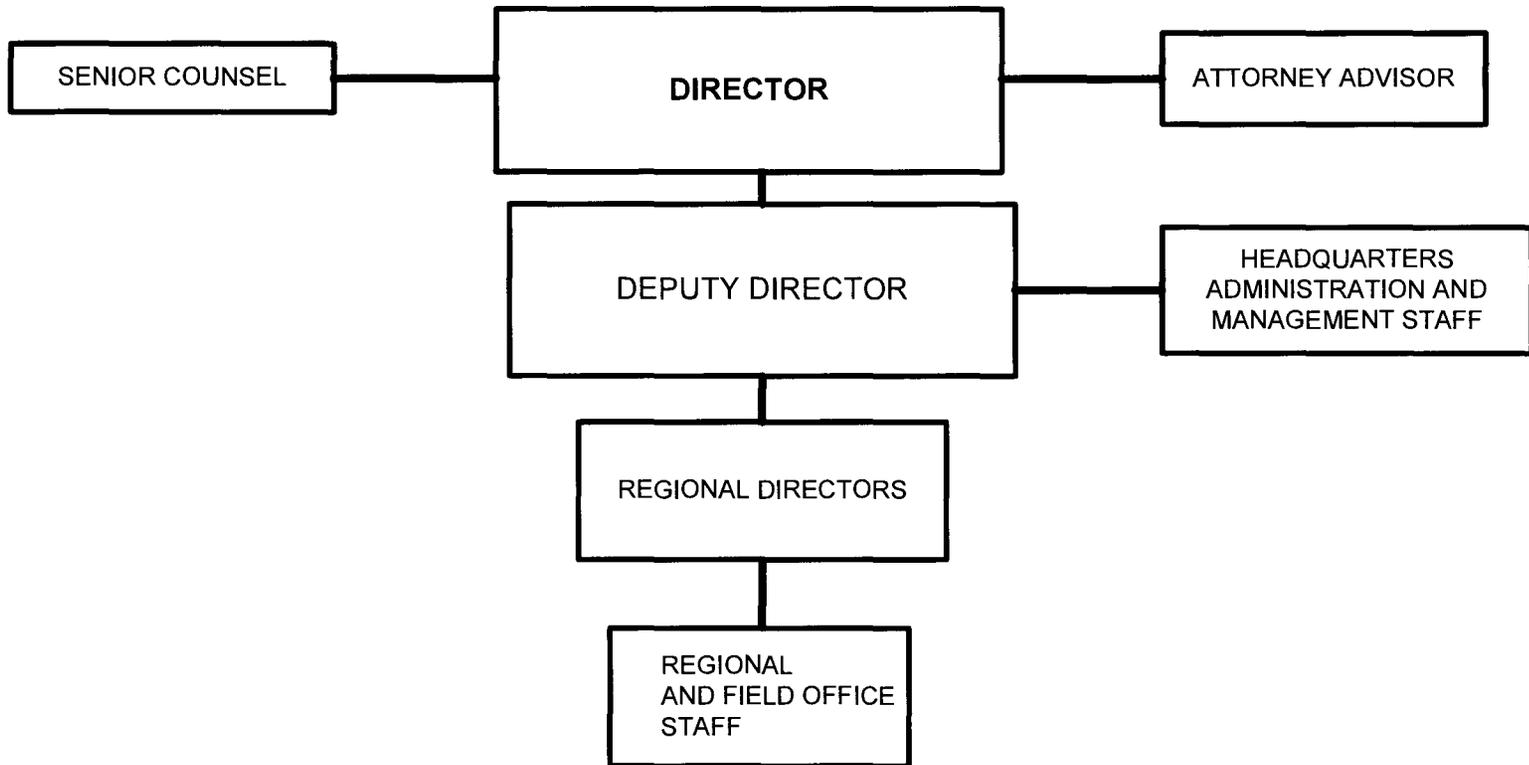
Appendix 2:

Community Relations Service Organizational Chart

May 16, 2013

Produced for Congress

COMMUNITY RELATIONS SERVICE



Approved by: 
ERIC H. HOLDER, JR.
Attorney General

Date: 5/16/13

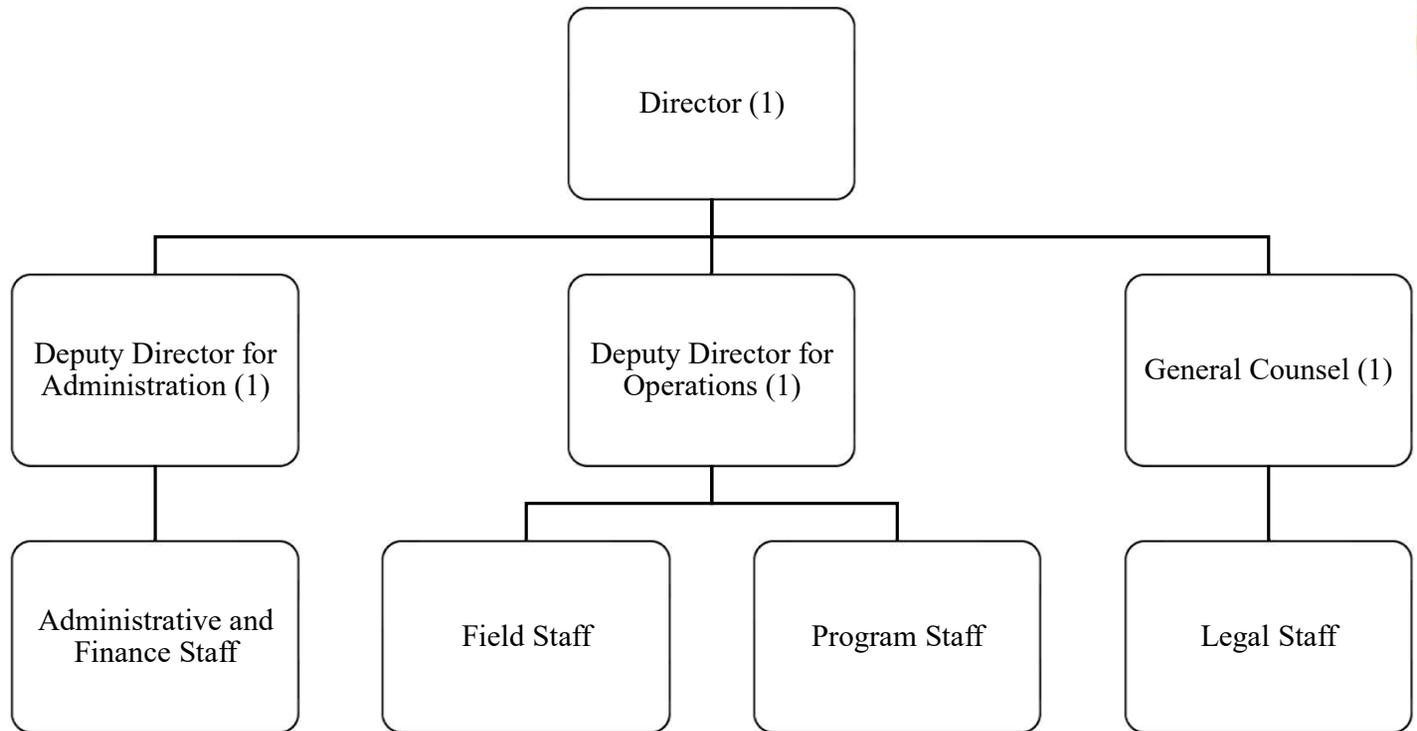
Appendix 3:

Community Relations Service “Future-State” Organizational Chart

[Proposed]

Produced for Congress

Appendix 3: Community Relations Service “Future-State” Organizational Chart



Produced for Congress

Administrative and Finance Staff (4)
 Executive Officer (1)
 Deputy Executive Officer (1)
 Administrative Support Specialist (1)
 Budget Analyst (1)

Field Staff (30)
 Regional Director (3)
 Lead Conciliation Specialist (5)
 Conciliation Specialist (22)

Program Staff (6)
 Supervisory Program Manager (1)
 Senior Program Analyst (1)
 Program Analyst (5)

Legal Staff (1)
 Program & Management Analyst (1)



U.S. Department of Justice
Community Relations Service

Washington, DC 20530

DATE: April 2, 2025

TO: Jolene Ann Lauria, Assistant Attorney General for Administration

FROM: Julius Nam, Associate Director & Component Head, CRS

RE: Community Relations Service's Feedback to the Deputy Attorney General's Memorandum "Soliciting Feedback for Agency Reorganization Plan and RIF"

The Community Relations Service ("CRS") appreciates this opportunity to offer feedback to the Deputy Attorney General's Memorandum to Heads of Department Components entitled "Soliciting Feedback for Agency Reorganization Plan and RIF" dated March 25, 2025 (the "Memorandum"). The Memorandum states the Department is considering "eliminating the Community Relations Service and moving some or all impacted employees to U.S. Attorneys' Offices." In response to the Memorandum's request for feedback, this submission describes how the Department may best implement the plan summarized in the Memorandum and outlines specific concerns associated with that plan.

I. Implementation Proposal for the Department's Reorganization Plan for CRS

CRS understands the Department's plan to consist of elimination of CRS as a stand-alone component and transfer of CRS's employees and statutory functions to United States Attorneys' Offices ("USAOs") and the Executive Office for United States Attorneys ("EOUSA"). As detailed below, the establishment of CRS through the Civil Rights Act of 1964 ("CRA") and the CRA mandates of confidentiality and non-engagement "in the performance of investigative or prosecuting functions of any department or agency" could pose implementation challenges to the plan in the Memorandum. 42 U.S.C. §§ 2000g-1, 2000g-2. The proposal below, however, addresses those concerns and offers a workable path forward.

A. CRS's Jurisdictional Mandates and Current Status

Before discussing specific recommendations for implementing the Department's plan, this section provides a summary of CRS's jurisdictional mandates and current status.

(1) Jurisdictional Mandates

CRS is a public safety component of the Department established by Title X of the CRA in 1964. The CRA designated the Director of CRS to be Presidentially appointed and Senate confirmed ("PAS"), for a term of four years. Historically, the CRS Director has reported to the Associate Attorney General. Although the CRA initially established CRS within the Commerce

Department in 1964, President Lyndon B. Johnson transferred CRS to the Justice Department in 1966, upon the transmission of a Reorganization Plan under the Reorganization Act of 1949.

Five statutes confer jurisdictional mandates upon CRS. Since establishment, the CRA has mandated CRS to provide conciliation where “peaceful relations among the citizens of the community involved” are threatened by some of the Nation’s most contentious and violent conflicts. 42 U.S.C. § 2000g, *et seq.* In 1968, the Fair Housing Act (“FHA”) specified that the Secretary of Housing and Urban Department (“HUD”) cooperate with CRS toward “preventing or eliminating discriminatory housing practices” under the FHA. 42 U.S.C. § 3608(e)(4). In 1996, CRS’s jurisdiction was significantly expanded by the Church Arson Prevention Act (“CAPA”), which directed CRS to prevent and respond to violations of federal criminal statutes that prohibit (a) destructive conduct using fire, bombs, or other explosives (18 U.S.C. § 844), and (b) damage to religious properties and interference with the free exercise of religion (18 U.S.C. § 247). In 2009, Congress further expanded CRS’s jurisdiction with the passage of the Hate Crimes Prevention Act (“HCPA”) to prevent and respond to situations where alleged assailants caused, or threatened or attempted to cause, bodily injury upon victims bearing protected traits under the Act (18 U.S.C. § 249). The Emmett Till Unsolved Civil Rights Crime Act of 2007 (which was reauthorized in 2016) (“Emmett Till Act”) required CRS to hold regular stakeholder meetings with CRT and FBI regarding their work under this Act and to “provide technical assistance by bringing together law enforcement agencies and communities to address tensions raised by Civil Rights era crimes” that resulted in deaths through December 31, 1979. Pub. L. 114-325, § 2.

To allow CRS to approach communities in conflict with impartiality and build trusting relationships, the CRA mandated that CRS conduct “conciliation assistance . . . in confidence and without publicity,” “hold confidential any information acquired in the regular performance of its duties,” and not “engage in the performance of investigative or prosecuting functions of any department or agency in any litigation arising out of a dispute” handled by CRS. A CRS employee who breaks the confidentiality mandate may be prosecuted for a federal misdemeanor offense under the CRA. 42 U.S.C. § 2000g-2.

In addition, the CRA conferred CRS a mediating role in federal judicial proceedings. The Act gave district courts authority to refer parties in CRA public accommodation cases to CRS for settlement proceedings during which CRS is authorized to “make a full investigation of any complaint referred to it by the court under [42 U.S.C. § 2000a-3(d)] and may hold such hearings . . . to bring about a voluntary settlement between the parties.” 42 U.S.C. §§ 2000a-3, 2000a-4.

Finally, the CRA requires that CRS submit an annual report to Congress on January 31 each year. 42 U.S.C. § 2000g-3.

(2) Current Status

Currently, CRS has a total of 56 FTE employees. They work in the Washington, D.C., headquarters office located at 145 N Street, N.E., Washington, D.C. (“2CON”), and in 25 field offices located in 17 states. The 56 employees include five employees who are on administration leave, having accepted the Administration’s Deferred Resignation Program. Among the 51 active employees, 37 are field employees and 14 are headquarters employees.

The 37 field employees occupy the following positions:

- 3 regional directors (“RDs”) (GS-15)
- 1 national program manager for Muslim, Arab, Sikh, South Asian, and Hindu communities (“NPM”) (GS-15)
- 6 lead conciliation specialists (“LCSs”) (GS-14)
- 27 conciliation specialists (“CSs”) (GS-09, GS-11, GS-12, or GS-13)

These 37 employees currently work out of CRS’s 26 locations as follows¹:

- Headquarters office: 1 CS
- USAOs (through co-location arrangements): 8 CSs in 8 USAOs
 - District of Arizona: Phoenix Office
 - Middle District of Florida: Orlando Office
 - Southern District of Indiana: Indianapolis Office
 - Southern District of Louisiana: New Orleans Office
 - District of Maine: Portland Office
 - District of New Mexico: Albuquerque Office
 - Western District of Pennsylvania: Erie Office
 - Western District of Texas: San Antonio Office
- GSA-Managed or -Contracted Locations: 28 field employees
 - Atlanta (3): 1 LCS; 2 CSs
 - Boston (1): 1 LCS
 - Charlotte (1): 1 CS
 - Chicago (2): 1 RD; 1 CS
 - Dallas (1): 1 LCS
 - Denver (2): 1 RD; 1 CS
 - Detroit (1): 1 CS
 - Kansas City, MO (2): 2 CSs
 - Los Angeles (3): 1 RD; 1 LCS; 1 CS
 - Miami (2): 2 CSs
 - New York City (3): 1 LCS; 2 CSs
 - Philadelphia (3): 1 NPM; 2 CSs
 - Sacramento (1): 1 CS
 - Seattle (2): 1 LCS; 1 CS
 - St. Louis (1): 1 CS

The 14 headquarters employees serve in the following positions²:

- Management: 1 employee
 - Associate Director (GS-15)

¹ The 37 field employees are supervised by the associate director who oversees CRS’s five regions. The five regions, each headed by a regional director, are as follows: (1) Atlantic North Region: Boston, Erie, New York, Philadelphia, Portland (ME), and Washington, D.C. offices; (2) Midwest Region: Chicago, Detroit, Indianapolis, Kansas City (MO), and St. Louis offices; (3) Mountain Central Region: Albuquerque, Dallas, Denver, and San Antonio offices; (4) South Region: Atlanta, Charlotte, Miami, New Orleans, and Orlando offices; and (5) West Region: Los Angeles, Sacramento, and Seattle offices.

² In addition, through a contract with CGI Federal, CRS has eight full-time contractors. Four are administrative assistants in the regions. Four are in the headquarters office, supporting CRS’s financial management, case management, legal management, and administrative needs.

- Training and Program Development: 5 employees
 - Supervisory Program Manager (GS-15)
 - Program Analysts (GS-11 through GS-13): 4 employees
- Case Management: 2 employees
 - Senior Program Analyst (GS-14)
 - Program Analyst (GS-11)
- Administration: 3 employees
 - Executive Officer (GS-14)
 - Deputy Executive Officer (GS-13)
 - Administrative Support Specialist (GS-11)
- Financial Management: 1 employee
 - Budget Analyst (GS-13)
- Legal: 2 employees
 - General Counsel (GS-15)
 - Program & Management Specialist (FOIA) (GS-13)

Congress appropriates funding for CRS under a separate line item in the annual budget. In FY 2024, Congress appropriated \$24 million for CRS, which continues through the end of FY 2025 under a continuing resolution (“CR”).

B. Implementation Approach

The implementation approach recommended below addresses how the Department may effectuate the transfer of CRS’s functions and employees to USAOs and EOUSA, while taking into account CRS’s status and statutory mandates.

(1) Overview

Taking the transfer of CRS’s statutory functions and employees into USAOs as the topline approach announced in the Memorandum, CRS recommends that its 37 field employees be reassigned to USAOs to serve as conciliation specialists (in principle, one CS per USAO)³ to continue to fulfill the CRA’s and subsequent jurisdictional statutes’ mandates for CRS—as applied to the USAO setting and under the direction of each U.S. Attorney and the EOUSA Director. CRS recommends that the Department create a new unit within EOUSA’s Office of Legal Programs for national coordination of conciliation services (“CRS unit”). The CRS unit would initially be staffed by eight employees from CRS’s current headquarters office. Like most of the other units within the Office of Legal Programs, the CRS unit would be headed by an assistant director, and provide programmatic coordination and data tracking of conciliation work in the USAOs. As for the remaining six CRS headquarters employees (3 administrative, 1 finance, and 2 legal employees), CRS recommends that they be assigned to comparable EOUSA positions, based upon their skills and expertise, in roles that allow them to continue providing assistance to conciliators while helping to fulfill the overall mission of the Department.

CRS recommends that the implementation of this plan take place in the next three months for conclusion by June 30, 2025. That would allow for a swift implementation of the plan, while

³ Because CRS’s RDs (GS-15), NPMs (GS-15), LCSs (GS-14), and CSs (GS-09 through GS-13) would be reassigned as a CS for each USAO, CRS proposes that the current position description and classification for the CS position be modified as a GS-09 to GS-15 position.

allowing CRS employees an opportunity to notify stakeholders of the component's reorganization, finalize any planned services or programs, close cases, and provide stakeholders with the new points of contacts within the newly created CRS Unit at EOUSA.

(2) Benefits of the Proposed Plan in the Memorandum

Elimination of CRS and transfer of its statutory functions and employees to EOUSA and USAOs have the benefit of contributing significantly to the current government-wide reduction efforts that the Administration is engaged in, while capitalizing on an existing close relationship between CRS and USAOs.

Throughout its nearly 61-year history, CRS has worked closely with USAOs. Currently, under a 2022 Memorandum of Understanding signed by CRS and EOUSA, every CRS case is alerted to the USAO in whose district the case arises—with significant updates being shared with the USAO (subject to CRS's confidentiality mandate discussed below). If the USAO has a pending investigation or prosecution concerning a CRS case, CRS may pause or withdraw its engagement in deference to the USAO's activities. Many, if not a majority, of CRS's public programs include USAO representation and are often planned with USAOs. Thus, the planned placement of CRS's statutory functions and employees in USAOs and EOUSA will likely have the benefit of bringing together two components with closely connected equities and creating synergy to engage coherently and comprehensively in their response, prevention, intervention, and community outreach efforts in relation to civil rights violations, hate crimes, and violent community conflicts.

Moreover, the proposed transfer will result in consolidation of shared functions and reduction of duplicative efforts between CRS and EOUSA—such as the administrative, HR, security, travel, finance, legal, FOIA, communications, IT, and program development functions. The transfer will lead to reduction of some duplicative efforts that exist between the work of CRS CSs and USAO community outreach specialists in communities.

(3) Creation of a CRS Unit and Assignment of CRS Headquarters Employees in EOUSA

In light of CRS's statutory establishment and mandates, CRS recommends that, upon the transfer of its functions and employees to EOUSA and USAOs, the Director of EOUSA be appointed to serve as the Acting Director of CRS (assuming a PAS Director will not be installed) and a CRS unit be created in the EOUSA Office of Legal Programs. The EOUSA Director—in the CRS Acting Director capacity—would then be responsible for carrying out the various statutory mandates for CRS, through oversight of the CRS unit and in coordination with U.S. Attorneys who supervise conciliation specialists. Given that the CRA only mandates that there be a Director and a Service named CRS without any additional requirements on how CRS must be organized, designation of the EOUSA Director as the Acting Director of CRS and maintenance of CRS's statutory functions through conciliation specialists with programmatic support by the CRS unit should adequately satisfy the statutory requirements.

This approach envisions that the CRS unit would initially be created with CRS's associate director, training and program development team (which consists of a supervisory program manager and four program analysts), and case management team (which consists of a senior program analyst and a program analyst) as an eight-person unit. CRS's current associate director would serve as the assistant director for the CRS unit; and the rest of the unit would take on the

titles and positions of the comparable members of other Legal Programs units, consistent with the CRS employees' current grades and positions. Like the other units in the Legal Programs office, the CRS unit would not be listed in EOUSA's organizational chart, and the unit would not supervise any of the conciliation specialists to be assigned to USAOs, but provide training, coordination, communication, data tracking, and, if necessary, cross-district deployment of conciliation specialists and de-confliction and standardization of conciliation practices. The CRS unit would also be responsible for preparing the CRA-required annual reports to Congress under the supervision of the EOUSA Director and in coordination with U.S. Attorneys and the conciliation specialists in their districts.

(4) Assignment of CRS Field Staff in USAOs

As stated, under this approach, CRS's 37 field employees would be assigned to 37 separate USAOs as conciliation specialists. The current locations of CRS's field offices reflect CRS's determination—based on a 2022 assessment of civil rights, hate, and violent crimes statistics, as well as population growth trends—regarding the cities and communities where CRS's conciliation services are needed the most. Thus, CRS recommends that the current locations of CRS's field employees be preserved to the greatest extent. At the same time, where the needs and capacity of the USAOs differ from CRS's determination, CRS, EOUSA, and individual USAOs should coordinate to make the most appropriate placement of conciliation specialists to best fulfill the Department's mission.

Specifically, CRS proposes that the eight CSs already co-located in USAOs be formally reassigned to the same USAOs where they are currently situated. As for the remaining 29 field employees, CRS proposes that CRS and EOUSA coordinate the reassignment of each employee, taking into account the employees' current locations and the individual USAOs' capacity and needs.

(5) Fulfillment of CRS Statutory Functions out of USAOs

To sum up again CRS's key statutory mandates, the CRA requires that CRS offer conciliation services where "peaceful relations" are threatened by disputes, disagreements, or difficulties relating to discriminatory practices addressed by the CRA. The FHA requires CRS and HUD work together to prevent and eliminate discriminatory housing practices. The CAPA mandates that CRS "prevent and respond to" alleged violations of 18 U.S.C. §§ 247 and 844, and the HCPA gives CRS the same prevention and response mandate as to 18 U.S.C. § 249. The Emmett Till Act requires CRS to bring law enforcement and communities together to address tensions related to unsolved civil rights homicides.

CRS currently fulfills the above mandates in three major ways as outlined below, which CSs will be able to accomplish in an equivalent manner in USAOs without material changes.

- a. Critical Incident Response: CRS responds to critical incidents (including high-profile civil rights incidents, as prominently outlined in the Department's "Protocol for Responding to High-Profile Civil Rights Incidents"; see Appendix 1) to prevent further violence, de-escalate and diffuse community tensions, and offer assistance to government authorities, law enforcement, and communities affected by the incidents. As part of these services, CRS conducts facilitated dialogues among communities in conflict and, in

coordination with law enforcement agencies, provides contingency training and event marshal training to groups, among other services.

In USAOs, CSs can continue to work closely with violent crime and terrorism AUSAs, victim witness specialists, and federal, state, and local law enforcement agencies, to respond to critical incidents—with the goal of assessing community needs and impact, facilitating communications between affected communities and law enforcement, coordinating with other DOJ components for provision of necessary services, working with community groups protesting in relation to the critical incidents to promote safe and lawful First Amendment expressions, and de-escalating and resolving conflicts among community groups reacting to critical incidents.

- b. Prevention of Violence, Civil Rights Violations, and Hate Crimes: CRS engages in significant work to prevent violence, civil rights violations, and hate crimes in communities. CRS achieves that goal through educational and training programs offered to stakeholders, including victim groups and various religious, civic, and community organizations. As part of this prevention work, CRS also conducts facilitated dialogues among communities in conflict and offers public safety consultation services to various institutions to support their capacity building for violence intervention and civil rights violations and hate crimes prevention.

In USAOs, working within the priorities set by the Administration, the Attorney General, and each U.S. Attorney, CSs can continue their work of organizing and facilitating hate crimes forums, protecting places of worship forums, protecting centers of community forums, dialogues around community conflicts forums, contingency and event marshal trainings, and other similar forums and programs—both to respond to incidents arising from violent conflicts and other jurisdictional issues and to prevent future incidents.

- c. Law Enforcement Support and Consultation: CRS provides training and consultation support to federal, state, tribal, and local law enforcement agencies to help officers better understand various community groups and religious traditions (including lesser-known groups with particular needs and interests) and engage with those groups more safely and effectively in the administration of justice.

In USAOs, working under the direction of U.S. Attorneys, CSs can continue to offer the training programs and consultation (with any modification directed by the EOUSA and USAO supervisors) to various law enforcement agencies to promote stronger police-community relations.

(6) The CRA Confidentiality and Non-Investigation/Prosecution Mandates

Two mandates for CRS under the CRA will likely require minor recalibration for former CRS employees to be able to work effectively within EOUSA and USAOs. They are the CRA's mandates of confidentiality and non-engagement with investigation and prosecution. Although some additional thinking and internal guidance may be required, EOUSA and USAOs should be able to achieve clarity on the application of the two mandates.

a. Confidentiality Mandate

As noted above, the CRA requires that CRS employees conduct “conciliation assistance . . . in confidence and without publicity” and “hold confidential any information acquired in the regular performance of its duties.” 42 U.S.C. § 2000g-2. A CRS employee who breaks the confidentiality mandate may be prosecuted for a federal misdemeanor offense under the CRA. *Id.* Under CRS’s current interpretation of this mandate, a CRS employee is not to share with anyone outside of CRS information learned from a community member or group during the employee’s conciliation work unless the information is already publicly reported or is no longer confidential due to waivers provided by the parties, carries no reasonable expectation of confidentiality, or contains a statement of intent to commit a criminal act or a description about the actual commission of a criminal act. Under a guidance given to CRS since 2014 (see Appendix 2), “protected information generally cannot be disclosed to: (1) the press; (2) other DOJ components and federal agencies; (3) Congress; or (4) members of the public and groups who are not parties to the CRS-facilitated.”⁴ But it has always been the case that the confidential information may be shared with the CRS employee’s supervisors and CRS’s supervising leadership offices without breaking confidentiality, given the reality that CRS and its employees are agents and representatives of their supervisory officials. CRS is not aware of any court or a Department leadership office issuing an opinion or guidance on CRS’s confidentiality mandate.

Once CRS employees become members of USAOs and EOUSA, the same principles should apply. Former CRS employees should continue to abide by the CRA’s confidentiality mandate, which would also bind their supervisors in the USAOs and EOUSA. Although a new guidance on confidentiality will likely be needed to further clarify how the mandate should apply in the EOUSA and USAO context (e.g., to determine whether the information in a CS’s possession may be shared directly by the CS to an AUSA in the same USAO or a different USAO without supervisory approval; how the confidentiality mandate should apply in relation to rules governing discovery; whether additional exceptions or strictures should apply), there should not be a material difference between how current CRS employees adhere to the confidentiality mandate and how they would adhere to the same as EOUSA and USAO employees.

b. Non-Engagement in Investigation and Prosecution Mandate

The CRA also requires that CRS employee not “engage in the performance of investigative or prosecuting functions of any department or agency in any litigation arising out of a dispute” handled by CRS. 42 U.S.C. § 2000g-2. This mandate requires CRS employees to work apart from the investigative and prosecution teams of USAOs and other law enforcement agencies. Although CRS’s field employees currently work closely with law enforcement and actively exchanges non-confidential information with investigators and prosecutors as requested and appropriate, the employees take care not to participate, directly or indirectly, in investigative, prosecutorial, or any other type of enforcement actions.

A new guidance on this non-engagement mandate will also likely be needed to further clarify how the mandate should apply in the USAO context. However, by treating CSs in a manner analogous to victim witness specialists, community outreach specialists, law enforcement coordinators, and public information officers who do not directly engage in investigation or

⁴ CRS Standard Operating Procedure 7.0 Appendix A, “Community Relations Service Confidentiality Mandate.”

prosecution, USAOs should be able to abide by the mandate for CSs not to engage in investigations or prosecutions.

(7) Timeline

CRS recommends that the approach outlined in this submission be implemented in the next three months, during the third quarter of FY 2025, for completion of the transfer of statutory functions and employees to EOUSA and USAOs by June 30, 2025. If needed, the transfer may commence with CRS employees being detailed to EOUSA under non-reimbursable arrangements.

(8) Financial Mechanism to Help Achieve the Proposed Timeline

In order to achieve the proposed transfer of statutory functions and employees to EOUSA and USAOs, CRS proposes that a reimbursable agreement be reached between CRS and EOUSA to transfer all of CRS's remaining and available funds under the current CR (estimated to stand at approximately \$12 million on June 30, 2025), to EOUSA to fulfill CRS's statutory functions. As a variation to this approach, CRS and EOUSA may also consider beginning the transfer process by sending CRS employees to EOUSA through non-reimbursable detail arrangements.

II. Statutory Concerns to Be Addressed

As noted in part above, elimination of CRS and transfer of its statutory functions and mandates to EOUSA and USAOs will pose some concerns.

First, fully eliminating CRS without transfer of functions and Director position would appear to run counter to the Congressional intent in the CRA regarding the establishment of CRS and its Director. Thus, to fully effectuate elimination, the Department would need to seek a revision to the CRA and other jurisdictional statutes discussed above. If Congress does not make statutory revisions to effectuate the planned elimination of CRS, the PAS status of the CRS Director position would require that a reporting line from the CRS Director to the Attorney General be maintained. The implementation approach recommended above to designate the EOUSA Director as the Acting CRS Director does not appear to violate any statutory commands and should offer a workable measure until the CRA is amended.

Second, another area of concern associated with the proposed transfer of CRS's functions to EOUSA and USAOs would be that CSs' placement within USAOs, a criminal and civil enforcement component, will likely lead to confusion and distrust regarding CRS's confidentiality, non-investigation, and non-prosecution mandates as well as regarding the CSs' continuing ability to serve as neutral and impartial conciliators. For example, stakeholders and complainants may be less inclined to seek CRS's services with CRS's reporting line being placed within a prosecutorial agency of the Department. A concerted effort will likely be needed to inform and educate CRS's traditional stakeholders as to the Department's continuing commitment to CRS's statutory functions and mandates.

Appendix 1

Department of Justice “Protocol for Responding to High-Profile Civil Rights Incidents,” March 14, 2016

Produced for Congress

Protocol for Responding to High-Profile Civil Rights Incidents



When high-profile incidents with civil rights implications occur, such as officer-involved shootings or violent hate crimes, they often are of intense public interest and have the potential to become flashpoints for tension and concern in the communities in which they occur and around the country. This document sets out the Department of Justice's protocol for responding promptly and appropriately when such incidents occur. The protocol is based on immediate coordination and cooperation from the following components: the U.S. Attorney's Office in the district in which the incident occurred (USAO); the Civil Rights Division (CRT); the Federal Bureau of Investigation (FBI); the Office of Community Oriented Policing Services (COPS Office); the Community Relations Service (CRS); and the Office of Public Affairs (OPA). Depending on the nature of the incident, not all components may be involved at all times, but initial and continued coordination will help ensure that the Department responds appropriately and effectively to all such incidents.

IMMEDIATE RESPONSE - DAY ONE

- ❑ **Initial Coordination Among Law Enforcement Components: USAO, CRT, and FBI**
 - As soon as possible after the incident, representatives from each component should communicate with one another and coordinate efforts to respond to the incident. The coordination should include a discussion of local relationships to assess which component(s) should take the lead in contacting law enforcement and community leaders in the community where the incident occurred. Each component is encouraged to identify a point of contact (POC) to help facilitate effective and efficient communication going forward.
 - Components should notify and coordinate with DOJ Leadership offices (Attorney General, Deputy, and Associate), as well as the Offices of Public Affairs and Legislative Affairs.
 - The components should jointly assess how to implement the steps outlined below.
- ❑ **USAO, CRT, and FBI Coordinated Responsibilities**
 - **Law Enforcement Engagement**
 - Coordinate with FBI Headquarters (FBIHQ) and local field office to gather facts.
 - CRT and USAO should coordinate communication with FBI to avoid duplication of inquiries.
 - Assess DOJ investigative posture: i.e., open federal investigation; monitor local investigation; support local investigation. The federal investigation may be concurrent with, but independent from, the state or local investigation.
 - Determine whether and how the matter will be opened in each office.
 - CRT and USAO should each assign a line attorney (trial attorney and AUSA respectively), and clearly establish supervisory roles and expectations. CRT and USAO should ensure that the assigned line attorneys are communicating with each other. CRT and USAO should also clarify parameters of any potential separate (civil and criminal) investigations.

- Determine what specific investigative or evidence gathering activities will commence on Day One. If feasible and appropriate:
 - Engage victim/witness coordinators in CRT, USAO, FBI, and be sure to coordinate with state authorities so that victims are not contacted by more people than necessary.
 - Begin conducting witness interviews, collecting evidence, etc.
 - Determine what precautions should be taken to protect against any investigators being tainted by *Garrity* material (material that may not be constitutionally permissible for use in a criminal case under the Fifth Amendment).
 - ✓ Strongly consider assembling “clean” and “taint” teams at the beginning of an investigation. The clean team should be advised to avoid all media reports of the incident until they are designated clean by the taint team.
 - Designate POC(s) to coordinate with local prosecutor/law enforcement.
 - Determine if criminal and civil matters will proceed at the same time. If so, promptly draft a Parallel Proceedings Memo.
 - Determine what community engagement, if any, may be appropriate and whether COPS, CRS, and/or CRT should provide any immediate assistance.
- **FBI-Specific Responsibilities**
- If warranted, the affected FBI field office will follow its Crisis Response Plan, which outlines specific response protocols.
 - The Special Agent in Charge (SAC) of the affected FBI field office will work with the USAO and CRT to develop and implement the federal law enforcement response and will coordinate with the USAO, CRT, other agency decision-makers, and FBIHQ to address other related issues as they arise.
 - During events where a command post is activated, a Legal Coordinator will be assigned to the Operations Support Group. This is typically the Chief Division Counsel (CDC) when the On Scene Commander (OSC) is the FBI SAC. The Legal Coordinator generally : (a) provides appropriate legal guidance to the OSC; (b) initiates and maintains contact with the local U.S. Attorney’s Office, State Prosecutor’s Office, etc.; and (c) in coordination with the local U.S. Attorney’s office, provides guidance to FBI personnel on all legal matters that arise during the crisis.
- **Public/Community/Internal Engagement**
- DOJ-Office of Public Affairs (OPA), USAO-Public Affairs Officer, DOJ Leadership offices, FBI, CRT, COPS, CRS and other relevant components should coordinate regarding public statements on DOJ’s investigative posture. Components should designate an OPA POC.
 - All public statements related to the incident should be coordinated with DOJ-Office of Public Affairs.
 - Ensure that information is segregated or shared, as appropriate under DOJ policy.
 - Coordinate with the Office of Legislative Affairs to respond to any inquiries from members of Congress.

- Canvass CRT sections to develop a full picture of the Division’s civil rights work in the affected jurisdiction.

□ **COPS Office Responsibilities:**

- Coordinate with other DOJ components (CRT, FBI, USAO, and CRS) regarding whether and how the COPS Office can provide assistance and resources to the affected jurisdiction, as well as the timing of such assistance.
- Communicate with local chief/sheriff and U.S. Attorney (typically communication is initiated by local chief/sheriff or U.S. Attorney).
- Determine if immediate assistance is appropriate. Immediate assistance could include: providing existing COPS Office resources (research, best practices, and other knowledge products) that are relevant; arranging a conference call with the affected chief of police and other chiefs of police who have expertise and perspective on the particular issues of concern; and/or through the COPS Office Critical Response program, identifying who (if anyone) should immediately be on the ground and facilitating engagement of the appropriate people.

□ **CRS Responsibilities**

- Coordinate with other DOJ components (CRT, FBI, USAO, and COPS) regarding whether and how CRS can provide assistance and what community engagement and/or service delivery, if any, should take place.
- Identify which CRS services may be needed within the first 24 hours after the incident.
- Communicate with local chief/sheriff and the mayor, if appropriate.
- Contact local community leaders (e.g., faith leaders, civil rights organizations, and advocates) to gain perspective on issues and concerns and to determine CRS jurisdiction (i.e., a community conflict, dispute, or situation related to discriminatory practices concerning race, color, national origin or preventing or responding to an alleged violent hate crime committed on the basis of actual or perceived gender, gender identity, sexual orientation, religion or disability).
- If necessary, identify who and how many CRS conciliators should be deployed to the affected jurisdiction.

DAY TWO – TWO WEEKS

□ **Law Enforcement Engagement: USAO, CRT, and FBI Continue Coordinated Efforts**

- In consultation with CRT, USAO, and FBI, make a preliminary determination of the federal investigative role. Establish and revise, as needed, a schedule for the coming days regarding the evaluation of federal law enforcement involvement in the matter, as circumstances may change.

- Ensure that DOJ Leadership offices are informed of such decisions in a timely manner, either directly or through use of the Urgent Report system.
- CRT and USAO should continue to coordinate regarding personnel assigned to the case.
- If a criminal investigation is opened:
 - In conjunction with CRT-CRM Section, USAO and FBI should:
 - Consider any immediate evidence-preservation steps
 - ✓ Search warrants
 - ✓ Subpoenas
 - Meet with District Attorney and/or local law enforcement
 - Use social media to seek information for investigation
 - CRT attorney should assess whether and when to travel to the location of the incident to meet with FBI, local prosecutors, District Attorney and/or local law enforcement.
- **Internal DOJ Coordination Regarding Media and Community Engagement**
 - Coordination among DOJ-Office of Public Affairs, USAO-Public Affairs Officer, DOJ Leadership offices, and other relevant components to devise and execute an effective media plan/strategy.
 - Coordinate among relevant components and DOJ Leadership offices to alert media and other stakeholders as to the nature of DOJ involvement.
 - Consider whether the Attorney General, Assistant Attorney General for the Civil Rights Division, U.S. Attorney and/or other principals should make media statements regarding incident and federal investigative posture.
 - Draft talking points for U.S. Attorneys in districts outside of district where incident occurred, relevant agency heads, and any other government officials who may have to field questions. Prior to dissemination, the relevant components and DOJ Leadership offices should confer regarding such talking points.
 - Consider using social media to amplify message that DOJ is engaged.
 - Depending on the circumstances of the incident, engage in community outreach. Any such outreach should be carefully considered and conducted in coordination with (but not necessarily jointly) with other DOJ components to avoid multiple and potentially inconsistent messages from DOJ. Offices to coordinate with include: CRT, USAO, FBI, CRS, and the COPS Office.
 - Continue to review community and law enforcement response to the incident.
 - Relevant components and DOJ Leadership offices confer to assess advisability of a visit to locality by DOJ principals.
 - In consultation with DOJ Leadership offices, CRT, USAO, and the COPS Office should:
 - Consider AG/AAG/CRT/COPS conference call with concerned national and local community groups, faith leaders, civil rights leaders, and law enforcement organizations.
 - Determine whether to contact local elected officials and law enforcement leaders, including the mayor, police chief, police union(s), and state prosecutor.

- The Office of Legislative Affairs (OLA) should determine whether to contact members of Congress.

□ **CRT/Special Litigation Section (SPL) Responsibilities**

- Ascertain whether SPL already has an open matter(s) in the jurisdiction.
- If a matter is open, consider the impact of the new incident and related events and reporting on the open matter:
 - Preliminary investigation → consider whether to open a full, noticed investigation
 - Noticed Investigation → consider facts as part of pattern-or-practice analysis
 - Filed Litigation → consider facts as evidence during discovery, motions, and trial stages; determine whether incident indicates need for immediate litigation response (e.g., a TRO)
 - Enforcement of Reforms → consider whether to seek contempt finding or specific remedy
- If a matter is not open, consider other DOJ options, in consultation with the COPS Office and the Office of Justice Programs (OJP) regarding their component-specific potential interventions:
 - Collaborative Reform (COPS)
 - Technical Assistance & Critical Response (COPS)
 - Diagnostic Center (OJP)
 - Other COPS or OJP Technical Assistance
- If a matter is open and unrest seems likely, make contact with individuals and groups with whom CRT-SPL already has a rapport to assess the temperature on the ground and opportunities for federal assistance. Connect individuals and community groups to CRS and/or local USAO resources, as appropriate.
- Consider whether and when the investigative trial team should visit the area to meet with city officials, law enforcement, and community members.

□ **COPS Office Responsibilities**

- In coordination with other DOJ components (CRT, FBI, USAO, and CRS), explore the need for new or additional assistance. If warranted, develop a technical assistance work plan in consultation with the Office of Justice Programs (OJP), and begin delivering technical assistance.
 - Depending on the circumstances of the incident, offerings such as “peer-to-peer exchange” may be appropriate. This includes offering peer-to-peer support to the chief (bringing in chiefs from other jurisdictions that have experienced similar situations and can offer guidance).
- Notify U.S. Attorney in affected district, as well as other relevant components and DOJ Leadership offices, of specific plan for assistance.

❑ CRS Responsibilities:

- In coordination with other DOJ components (CRT, FBI, USAO, and COPS), determine what additional assistance is necessary. Additional CRS services may include mediation, conciliation, training, and/or facilitated dialogue to community and conflict stakeholders.
- Conduct community outreach to identify and determine which, if any, of the following groups are involved in responses to the incident: demonstration groups, social media activists, bloggers, and potential counter-demonstration groups.
- Continue to identify and connect key conflict stakeholders. These frequently include the mayor and other local government and elected officials; law enforcement; Human Relations Commission and Community Relations Officials; local and national civil rights organizations; faith leaders; youth organizations; secondary schools and institutions of higher learning; and housing and neighborhood associations; and the Department of Housing and Urban Development (HUD).
- Identify desired outcomes based on current conflict, i.e.:
 - Establishing and/or improving police–community dialogues;
 - Reducing tension in the community
- Coordinate with other relevant components and other Federal agencies (e.g., DHS, FEMA, DOL, HUD) that are present in the community, when appropriate and in compliance with the Agency’s Confidentiality Mandate and jurisdictional lane.
- Continue to assess whether additional staff need to be deployed.

TWO WEEKS AND BEYOND

❑ Law Enforcement Engagement: USAO, CRT, and FBI Continue Coordinated Efforts

- Consider scheduling regular call with the USAO, CRT, and FBI to discuss status.
- Local investigation/prosecution: periodically reevaluate whether the action being taken at the local level is appropriate and sufficient.
 - Monitor any state criminal investigation, obtaining pertinent materials in real time if possible.
 - Ensure that all potentially pertinent investigative material are being collected and preserved.
- Obtain victim services to help with those traumatized by the incident, if appropriate.
- Ascertain whether there are any broader issues which might indicate that a broader investigation should be opened. For example, if the incident and subsequent investigation pertain to a single shooting of an unarmed civilian, consider whether there is evidence, such as other instances of use of deadly force in similar circumstances, that suggests that a pattern and practice investigation is appropriate.

- Consider participating in and/or attending community meetings, adhering to the principle that the Department must always be and must be perceived as an objective party in evaluating the facts.
- Utilize existing structures and credible community events to enhance outreach on topics related to the incident.
- Monitor any civil proceeding, both collecting pertinent information in real time if possible, and ascertaining whether such proceedings should be stayed in order not to interfere with a criminal investigation.
- Host periodic calls with all DOJ stakeholders to coordinate outreach.
- **Internal DOJ Coordination Regarding Media and Community Engagement**
 - Continue to communicate and coordinate among DOJ components and DOJ Leadership offices.
 - Continue to assess media plan/strategy, and update the media plan as needed.
 - Develop long-term strategy, if necessary, defining roles and responsibilities among relevant components.
- **COPS Office Responsibilities:**
 - In coordination with other DOJ components (CRT, FBI, USAO, and CRS), assess the need for additional technical assistance. Depending on the circumstances, offerings might include:
 - *Providing training to officers.* Training may include procedural justice training (fair-and-impartial training, etc.), media, and social media training, etc.
 - *Strategic planning development.* Strategic planning development provides guided assistance to law enforcement officials by helping them align goals and objectives with the mission of their departments.
 - *Targeted In-depth review, analysis, and recommendations.* At the request of the law enforcement agency, the COPS Office can initiate an assessment (to include analysis and recommendations) of a specific law enforcement issue. The assessment may include a review of relevant departmental policies and accountability systems, focus groups and interviews with city and department stakeholders, community outreach, and direct observation of department operations.
 - Assess the need for Collaborative Reform (a long-term, holistic strategy to improve trust between police agencies and the communities they serve by providing a means to organizational transformation).

❑ **CRS Responsibilities:**

- In coordination with other DOJ components (CRT, FBI, USAO, and COPS), continue to assess the situation and the need to remain on the ground (and for how long), as well as the need to continue to provide mediation, conciliation, and/or on-going training.

Appendix 2

CRS Standard Operating Procedure 7.0 Appendix A,
“Community Relations Service Confidentiality Mandate”

Produced for Congress



Community Relations Service Guidance

CONFIDENTIALITY MANDATE

PURPOSE: The purpose of this document is to provide guidance to CRS staff on CRS management's interpretation of CRS's statutory confidentiality mandate.

SCOPE: This Order applies to all CRS employees.

CATEGORY: Legal.

AUTHORITY: 42 U.S.C. §§ 2000g, 2000g-2; 28 C.F.R. Part 0, Subpart F.

CANCELLATION: CRS Standard Operating Procedures, Section 3.3.1 ("Confidentiality").

DATE: November 25, 2014



APPROVED BY: Grande H. Lum
Director

I. The Mandate

Title X of the Civil Rights Act of 1964, which created the Community Relations Service (CRS), provides:

The activities of all officers and employees of the Service in providing conciliation assistance shall be conducted in confidence and without publicity, and the Service shall hold confidential any information acquired in the regular performance of its duties upon the understanding that it would be so held. 42 U.S.C. § 2000g-2(b).

A CRS employee who publicizes information in violation of this confidentiality mandate is guilty of a misdemeanor and may be fined up to \$1,000 and imprisoned for up to one year.

II. What must be kept confidential?

Pursuant to this mandate, CRS staff must keep the following information confidential:

1. All statements or communications made by parties, or the positions taken by parties, during a conflict resolution process facilitated by CRS, for example a CRS-facilitated mediation or dialogue.
2. The identity of any party or source involved in a CRS-facilitated conflict resolution process, unless the party has clearly expressed that it does not wish to remain anonymous.
3. Information regarding who invited CRS into a community. [If the question arises, CRS staff can explain that CRS may offer its services either upon its own motion or by invitation.]
4. Any information acquired by CRS with the “understanding” that it would be held confidential, whether or not the information was obtained in the course of a CRS-facilitated conflict resolution process. The “understanding” of confidentiality can occur in one of two ways:
 - A. The source expressed either orally or in writing that the information should be kept confidential; or
 - B. The information was provided to CRS under circumstances that create a reasonable expectation that it will be kept confidential.

To keep information confidential means that it cannot be disclosed by CRS to anyone, unless the source expressly intends for CRS to disclose the information, for example to another party to the conflict. This means that protected information generally cannot be disclosed to: (1) the press; (2) other DOJ components and federal agencies; (3) Congress; or (4) members of the public and groups who are not parties to the CRS-facilitated conflict resolution process. This information is also exempt from disclosure under the Freedom of Information Act.

In order to avoid violating the confidentiality mandate, CRS-facilitated dialogues and mediation sessions should be closed to the press and to the public (other than stakeholders), and CRS staff should generally encourage the parties to keep their communications, and any information they acquire, confidential. However, parties may disclose information about the dialogue or mediation if they believe that doing so would be beneficial (the confidentiality mandate only binds CRS, not the parties). Caution: if a party plans to make public statements, it should make that clear to the other parties beforehand in case other parties have an expectation of confidentiality.

III. What may be shared?

CRS staff may disclose the following information (after clearance by CRS Headquarters, when feasible):

1. The general functions of CRS and the services it provides.
2. The fact that CRS is involved in a particular conflict or community.
3. A factual description of an incident that led to a conflict or situation in which CRS became involved, as long as the information is limited to what has been publicly reported.
4. A general description of the issues involved in a particular conflict or community, as long as the limitations above are observed (no party names, etc.).
5. A statement of an intention to commit a criminal act, or about the actual commission of a criminal act. [Such statements should be conveyed to the CRS General Counsel for reporting to the appropriate authorities.]
6. Information about disputes or parties that has already been publicly reported, as long as the public source is cited and the CRS employee does not confirm or deny the public reports.
7. Once CRS participation in a case is complete, CRS may disclose information about the case with the permission of the parties. The disclosure of a party's name requires the permission of that party. The disclosure of the contents of the discussions requires the permission of all parties.

IV. Benefits of confidentiality

Confidentiality is not only a legal requirement but also enhances CRS's effectiveness in helping communities resolve sensitive conflicts, which is based on CRS's ability to hear all sides and peacefully bring all disputants to the negotiating table. The parties to the conflict must be sure that they can discuss their positions and possible compromises candidly, without fear that their participation or their statements will be publicized or used against them. Publicity could "chill" parties' willingness to speak openly and to use CRS services. The disclosure of confidential

information by CRS could also undermine the perceived neutrality of CRS, another cornerstone of CRS's effectiveness.

V. Subpoenas

CRS staff who receive a subpoena directing them to produce documents or to testify at a trial or deposition should contact the CRS General Counsel. The statutory confidentiality mandate limits CRS's ability to respond to such subpoenas.

Community Relations Service: Planned Elimination and Fulfillment of Its Statutory Functions

Question for Leadership Decision

- Given the planned elimination of the Community Relations Service (CRS), which is statutorily established and carries statutory mandates, how should the Department fulfill CRS's mandated functions, including the annual report requirement?

Relevant Considerations

- Elimination of CRS and Reassignment of CRS Employees
 - Since the President's issuance of the February 11 executive order regarding workforce optimization and the Deputy Attorney General's proposed plan on March 25 to eliminate CRS, 22 employees remain in CRS—after 33 employees have either resigned, retired, or been placed on administrative leave under the Deferred Resignation Program.
 - Beginning in early May, under JMD's facilitation, the 22 remaining employees will be reassigned to various components. Un-reassigned employees will face the formal reduction-in-force process. No employee will remain with CRS by Sept. 30, 2025.
 - CRS has its own line in the appropriations for the Department. It is operating with a \$24 million budget. Approximately \$13 million remain currently, which should pay for the 22 remaining employees' salaries approximately through the end of FY 2026, if directed to other components through reimbursable agreements.
- CRS's Statutory Requirements
 - Title X of the Civil Rights Act of 1964 designates the Director of CRS to be Presidentially appointed and Senate confirmed for a term of four years. Historically, the CRS Director has reported to the Associate Attorney General.
 - Five statutes confer jurisdiction upon CRS:
 - Civil Rights Act of 1964 (CRA)
 - Fair Housing Act of 1968
 - Church Arson Prevention Act of 1996 (CAPA)
 - Emmett Till Unsolved Civil Rights Crime Act of 2007 (reauthorized in 2016)
 - Shepard-Byrd Hate Crimes Prevention Act of 2009 (HCPA)
 - CRA requires CRS to submit an annual report to Congress by January 31 each year.
 - CRA directs CRS to work toward restoring "peaceful relations" among communities in conflict over "discriminatory practices" addressed in CRA. CRA also has a confidentiality mandate (on pain of misdemeanor penalty) and a non-engagement in law enforcement mandate for CRS.
 - Under CAPA and HCPA, CRS is required to "prevent, and respond to" violations of 18 U.S.C. § 247 (damage to religious property and interference with religious exercise), § 844 (destructive conduct using fire or other explosives), and § 249 (actual/attempted/threatened bodily injury based on various protected traits).

CRS's Proposal in Light of Elimination

- Placement of a 10-person team housed in EOUSA, CRT, OJP, or another component to fulfill CRS's basic statutory functions. This team would be selected from the 22 remaining CRS employees to work in conjunction with USAOs, CRT, OJP, OVW, OTJ, and law enforcement components, as well as with Task Forces with shared mission.

ELIMINATION OF COMMUNITY RELATIONS SERVICE

Potential Questions

- Title X of the Civil Rights Act of 1964 established the Community Relation Service. Subsequent statutes empowered CRS to prevent and respond to, for example, violations of the Hate Crimes Prevention Act of 2009 and the Church Arson Prevention Act of 1996. But on March 25, the Deputy Attorney General issued a memo announcing elimination of CRS. Do you believe it's lawful for the Justice Department to eliminate CRS that Congress created without Congress's approval?
- The March 25 Deputy AG memo also proposes a transfer of CRS employees to U.S. Attorney's Offices. How will the confidentiality mandate that the Civil Rights Act of 1964 places on CRS employees work within USAOs, given the criminal discovery requirements applicable to USAOs?
- As part of the Continuing Resolution that Congress passed and the President signed in March, Congress appropriated \$24 million for CRS for FY 2025, as Congress did for FY 2024. Doesn't the elimination of CRS violate the will of Congress that the work of CRS continue?
- If CRS is being eliminated, what is, or should be, the Department's plan for fulfilling CRS's statutory mandates?
- If CRS is being eliminated, what is, or should be, the Department's plan for filling the void left by CRS's elimination in the Department's critical incident responses and violent conflict de-escalation and resolution work?
- Some have called for "full elimination" of CRS because of its "'equity' obsessed" and "woke and weaponized" nature of its work. They view CRS to be "driven by race essentialism and radical gender theory—hunting for 'hate crimes' defined through the prism of critical race theory and intersectional progressivism," which only "tear[s] apart the civil fabric necessary for a constitutional republic to survive." Others have also called for the elimination of CRS because CRS "deviates from the core purpose of the DOJ to investigate and prosecute violations of federal law," and "[i]nstead ... attempts to act as 'peacemaker' in local disputes and has been

used by the Biden Administration to push its woke gender and CRT ideologies.” Do you share this view? What is your position on these statements?

Topline

- I know the President and the Attorney General take seriously the constitutional command to “take care that the laws be faithfully executed.” If I am confirmed, I would be committed to fulfilling my role in the faithful execution of the laws of the United States.
- The President does have the authority to determine how best to faithfully execute the laws. Every Administration has had different priorities and emphases in their execution of laws to meet the needs of the moment and promote public safety and national security. Emphasizing some work and de-emphasizing others is within the President’s right and authority. I have no concerns with the Attorney General and the Deputy Attorney General’s reorganization plan of the Department to execute our mission more efficiently and responsibly.
- I have not been privy to the details of internal deliberations regarding the elimination of CRS and the placement of CRS’s employees and statutory functions. My general understanding is that the closure of the Community Relations Service as a stand-alone component does not mean discontinuation of statutory functions of CRS through other components of the Justice Department.
- As I understand the Deputy Attorney General to have directed, CRS’s employees will be transferred to United States Attorneys’ Offices, and the core, statutorily required functions of CRS will be fulfilled through the U.S. Attorneys’ Offices in communities where conflicts occur, the Department’s intervention is appropriate, and peaceful resolutions can be achieved through the deployment of the Department’s resources. However, I have not been privy to the details of internal deliberations regarding the placement of CRS’s employees and statutory functions, so I am unable to comment on them with specificity.

- As for the Department’s plan for filling the void left by CRS’s elimination in the Department’s critical incident responses and violent conflict de-escalation and resolution work, I can only respond generally, as I have not been privy to the details of internal deliberations.
 - Where there are critical incidents and violent conflicts that require the Justice Department’s responses, the Department will, of course, respond appropriately to restore peace and order in the communities and, where federal crimes have occurred, investigate and prosecute when appropriate.
 - The Department has many tools to de-escalate violent conflicts and restore “peaceful relations” in communities, as CRS’s establishing statute, the Civil Rights Act of 1964, calls for.
 - Under the direction of the Attorney General and the Deputy Attorney General, and in coordination with the 40+ components and 94 U.S. Attorneys’ Offices, I will do all I can to restore peace and address violent conflicts.
 - I understand that criminal investigation and prosecution are not the only answer to conflicts in our communities, so I understand why CRS was viewed to be necessary in the 1964 enactment of the Civil Rights Act. I believe the intent of the Deputy Attorney General’s reorganization with regard to CRS is to fulfill the goals of the CRA with greater efficiency through the U.S. Attorneys’ Offices.
- As for the various criticisms of CRS, I am aware of them. I am not aware of the specific incidents that led to the expression of those criticisms. If the concerns expressed in those criticisms are true, I too share those concerns and would want to ensure that regardless of which functions of CRS remain, those functions should be fulfilled in accordance with the mission of the Justice Department.

Background

Administration and Justice Department Actions

- On February 11, 2025, President Trump’s Executive Order *Implementing The President’s “Department of Government Efficiency” Workforce Optimization Initiative* “commence[d] a critical transformation of the Federal bureaucracy.” It directed agencies to “eliminat[e] waste, bloat, and

insularity” in order to “empower American families, workers, taxpayers, and our system of Government itself.”

- President Trump required that “Agency Heads shall promptly undertake preparations to initiate large-scale reductions in force (RIFs), consistent with applicable law.” President Trump also directed that, no later than March 13, 2025, agencies develop Agency Reorganization Plans.
- On March 25, 2025, the Deputy Attorney General issued a Memorandum to Justice Department component heads, “Soliciting Feedback for Agency Reorganization Plan and RIF.” The Deputy Attorney General announced that the Justice Department had submitted its Reorganization Plan to the Office of Management and Budget, which included the proposal of “eliminating the Community Relations Service and moving some or all impacted employees to U.S. Attorneys’ Offices.”
- On April 2, 2025, CRS submitted a memorandum in response to the Deputy Attorney General’s memorandum. CRS proposed that:
 - EOUSA Director be named the Acting Director of CRS
 - CRS’s conciliation specialists be assigned to U.S. Attorneys’ Offices throughout the U.S. to continue the statutory functions of CRS
 - EOUSA create a “CRS Unit” within its Office of Legal Programs to coordinate the activities of conciliation specialists in U.S. Attorneys’ Offices.
- As of April 24, 2025, specific decisions and plans on the proposed elimination of CRS and transfer of its employees to U.S. Attorneys’ Office remains pending.

Reactions to the Deputy Attorney General’s Memorandum

- The Deputy Attorney General’s March 25 memorandum was leaked and reported widely in the media starting the next day, with many criticizing the memorandum.
- On March 30, 2025, Rep. Jamie Raskin, Ranking Member of the House Committee on the Judiciary, issued a statement on the Deputy Attorney General’s memorandum (with a leaked copy of the memo), which Rep. Raskin referred to as “potential plans to wipe out essential crime-fighting efforts.” <https://democrats-judiciary.house.gov/news/documentsingle.aspx?DocumentID=5605>. But the statement did not make a specific reference to CRS.
- On April 6, 2025, CBS News published a story titled “Civil rights-era government agency in Justice Department to be purged,” stating: “A

landmark Justice Department office created in the 1960’s during the civil rights movement is marked for closure by the Trump administration, raising fears of a loss of generations of work tamping down and working to prevent unrest in the nation's major cities.” The article quoted a number of former CRS leaders. This has been the most significant media article on CRS.

<https://www.cbsnews.com/news/civil-rights-era-government-agency-to-be-purged/>

Criticisms of CRS

- In recent years, CRS has faced significant challenges and criticisms. President Trump’s FY 2020 and FY 2021 budget messages to Congress did not include requests for an appropriation for CRS. Instead, the budget requests proposed to “consolidate” CRS’s functions within the Civil Rights Division to “rightsize the Federal role in local conflict resolutions, while eliminating duplicative functions and improving efficiency” by reducing CRS’s personnel to 15 employees.¹
- The FY 2023 federal budget proposal published by the Center for Renewing America (which was led by Russ Vought, director of the Office of Management and Budget in the first Trump Administration and again in the current Administration) called for “full elimination of the ‘equity’ obsessed” and “woke and weaponized” CRS, which the Center viewed to be “driven by race essentialism and radical gender theory—hunting for ‘hate crimes’ defined through the prism of critical race theory and intersectional progressivism.” Asserting that CRS “serves only to perpetuate the continuing efforts of Washington to label citizens as ‘oppressors’ or ‘oppressed,’ . . . tearing apart the civil fabric necessary for a constitutional republic to survive,” the Center proposed “a total defunding” of CRS.²
- Similarly, the Republican Study Committee’s FY 2025 budget proposal called for the elimination of CRS because, according to the RSC, CRS “deviates from the core purpose of the DOJ to investigate and prosecute violations of federal law,” but “[i]nstead, the entity attempts to act as

¹ “A Budget for a Better America, Promises Kept, Taxpayers First, Fiscal Year 2020 Budget of the U.S. Government.” Appendix at 698. <https://www.govinfo.gov/content/pkg/BUDGET-2020-APP/pdf/BUDGET-2020-APP.pdf> (last accessed Feb. 12, 2025).

² Center for Renewing America, “A Commitment to End Woke and Weaponized Government: 2023 Budget Proposal,” at 10, 13. <https://americarenewing.com/wp-content/uploads/2024/03/Budget-Center-for-Renewing-America-FY23.pdf> (last accessed Feb. 12, 2025). Project 2025, on the other hand, does not contain a reference to CRS.

‘peacemaker’ in local disputes and has been used by the Biden Administration to push its woke gender and CRT ideologies.”³

- Before Congress passed the Continuing Resolution providing for a full-year funding for CRS for FY 2025 at the same level of FY 2024, the House’s marked-up text of the Commerce-Justice-Science (“CJS”) appropriations bill had \$0 for CRS. On the other hand, the Senate’s marked-up CJS appropriations bill had \$25 million allotted for CRS.

CRS’s Structure, Staffing, and Funding

- The CRA designated the Director of CRS to be Presidentially appointed and Senate confirmed (“PAS”), for a term of four years. 42 U.S.C. § 2000g. Historically, the CRS Director has reported to the Associate Attorney General.
- Although the CRA initially established CRS within the Commerce Department in 1964, President Lyndon B. Johnson transferred CRS to the Justice Department in 1966, upon the transmission of a Reorganization Plan under the Reorganization Act of 1949.
- Currently, CRS has 55 FTE employees.
 - After the Deputy Attorney General’s March 25 memorandum was announced and the Department made a renewed offer of the deferred resignation program (“DRP”), 32 CRS employees have accepted various versions of the DRP and are being placed on administrative leave.
 - Before the 32 employees accepted the DRP, 14 were in CRS’s headquarters employees in Washington, D.C. (with offices in 2CON), and 41 were conciliators working in 26 field offices throughout the Nation.
 - Currently, CRS has 23 active employees—8 in the headquarters office and 15 conciliators in 10 field offices.
 - CRS is currently led by the career Associate Director who is performing the duties of the component head as a “Supervisory Official.”
- Congress appropriates funding for CRS under a separate line item in the annual budget. In FY 2024, Congress appropriated \$24 million for CRS,

³ Republic Study Committee, “Fiscal Sanity to Save America: Republic Study Committee FY 2025 Budget Proposal,” at 148. https://hern.house.gov/uploadedfiles/final_budget_including_letter_web_version.pdf (last accessed Feb. 12, 2025).

which continues through the end of FY 2025 under the continuing resolution that Congress approved in March 2025.

- Below is a summary of CRS’s staffing and funding levels in FY 2017 through FY 2025.

Fiscal Year	Year-End Staffing Level	Budget	Note
FY 2017	40 FTE (hiring freeze)	\$15.5 million	
FY 2018	37 FTE (hiring freeze)	\$15.4 million	
FY 2019	32 FTE (hiring freeze)	\$15.5 million	
FY 2020	27 FTE (hiring freeze)	\$16.0 million	For these two years, President Trump requested \$0 for CRS and proposed placement of CRS within CRT with \$5 million and 15 FTE
FY 2021	30 FTE	\$18.0 million	
FY 2022	34 FTE	\$21.0 million	
FY 2023	53 FTE	\$25.0 million	
FY 2024	52 FTE	\$24.0 million	
FY 2025	55 FTE	\$24.0 million	Full-year CR

CRS’s Statutory Authorities

- Five statutes confer jurisdiction upon CRS:
 - Title X of the Civil Rights Act of 1964, 42 U.S.C. § 2000g, *et seq.*
 - Fair Housing Act of 1968 (which was amended by the Fair Housing Amendment Act of 1988)
 - Church Arson Prevention Act of 1996
 - Emmett Till Unsolved Civil Rights Crime Act of 2007 (which was reauthorized under the Emmett Till Unsolved Civil Rights Crimes Reauthorization Act of 2016)
 - Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009
- Civil Rights Act of 1964 (“CRA”)
 - Under the CRA, the mission of CRS is “to provide assistance to communities and persons therein in resolving disputes, disagreements, or difficulties relating to discriminatory practices based on race, color, or national origin” and to restore “peaceful relations among the citizens of the community involved.” 42 U.S.C. § 2000g-1.
 - To allow CRS to approach communities in conflict with impartiality and build trusting relationships, the CRA mandated that CRS conduct “conciliation assistance . . . in confidence and without publicity,”

“hold confidential any information acquired in the regular performance of its duties,” and not “engage in the performance of investigative or prosecuting functions of any department or agency in any litigation arising out of a dispute” handled by CRS.

- Any CRS member who breaks the confidentiality mandate may be prosecuted for a federal misdemeanor offense under the CRA. 42 U.S.C. §§ 2000g-1, 2000g-2.
 - In addition, the CRA conferred CRS a mediating role in federal judicial proceedings. The Act gave district courts authority to refer parties in CRA public accommodation cases to CRS for settlement proceedings during which CRS is authorized to “make a full investigation of any complaint referred to it by the court under [42 U.S.C. § 2000a-3(d)] and may hold such hearings . . . to bring about a voluntary settlement between the parties.” 42 U.S.C. §§ 2000a-3, 2000a-4.
 - Finally, the CRA requires that CRS submit an annual report to Congress on January 31 each year. 42 U.S.C. § 2000g-3.
- Fair Housing Act of 1968 (“FHA”)
 - The FHA recognizes CRS’s conflict resolution and prevention role in the housing discrimination context, and directs the Secretary of Housing and Urban Development to “cooperate with and render such technical and other assistance to” CRS “to further its activities in preventing or eliminating discriminatory housing practices” that violate 42 U.S.C. §§ 3604, 3605, 3606, 3617. 42 U.S.C. § 3608(e)(4).
 - Church Arson Prevention Act of 1996 (“CAPA”)
 - The CAPA strengthened existing 18 U.S.C. § 247 to provide for a more robust protection of religious properties and free exercise of religion, as well as protection from destructive conduct targeting religious properties and communities.
 - CAPA directs CRS to “prevent, and respond to potential violations” of 18 U.S.C. § 247 (damage to religious property and interference with free exercise of religion) and § 844 (destructive conduct using fire, bombs, or other explosives).
 - Emmett Till Unsolved Civil Rights Crime Act of 2007 & Emmett Till Unsolved Civil Rights Crimes Reauthorization Act of 2016 (“Emmett Till Act”)

- The 2007 Emmett Till Act requires CRS “to provide technical assistance by bringing together law enforcement agencies and communities in the investigation of violations of criminal civil rights statutes,” as such violations that resulted in death are being investigated by the Civil Rights Division (“CRT”) and the Federal Bureau of Investigation (“FBI”). Pub. L. 110-344, § 6(b).
- In reauthorizing the Emmett Till Act in 2016, Congress further required CRT, FBI, and CRS to hold regular meetings with various stakeholders to “discuss the status of the Department’s work under this Act.” Congress then further directed CRS to “provide technical assistance by bringing together law enforcement agencies and communities to address tensions raised by Civil Rights era crimes.” Pub. L. 114-325, § 2.
- Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009 (“HCPA”)
 - In enacting the HCPA, Congress created a new federal hate crime statute in 18 U.S.C. § 249 (bodily injury or attempted/threatened bodily injury based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability).
 - In connection with the HCPA, Congress increased CRS’s funding for additional personnel and directed CRS to “prevent and respond to alleged violations” of 18 U.S.C. § 249. Pub. L. 111-84, §§ 4706, 4707.

U.S. Department of Justice
Community Relations Service

Jurisdictional Statutes

Five statutes confer jurisdiction upon the Community Relations Service of the U.S. Department of Justice. CRS was established by Title X of the Civil Rights Act of 1964, 42 U.S.C. § 2000g, *et seq.* (“**CRA**”). The Fair Housing Act of 1968 (which was amended by the Fair Housing Amendment Act of 1988) (“**FHA**”), the Church Arson Prevention Act of 1996 (“**CAPA**”), the Emmett Till Unsolved Civil Rights Crime Act of 2007 (which was reauthorized under the Emmett Till Unsolved Civil Rights Crimes Reauthorization Act of 2016) (“**Emmett Till Act**”), and the Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009 (“**HCPA**”) have expanded CRS’s jurisdiction to intensify CRS’s public safety mandates.

CRA¹: Under the CRA, the mission of CRS is “to provide assistance to communities and persons therein in resolving disputes, disagreements, or difficulties relating to discriminatory practices based on race, color, or national origin” and to restore “peaceful relations among the citizens of the community involved.” 42 U.S.C. § 2000g-1. To allow CRS to approach communities in conflict with impartiality and build trusting relationships, the CRA mandated that CRS conduct “conciliation assistance . . . in confidence and without publicity,” “hold confidential any information acquired in the regular performance of its duties,” and not “engage in the performance of investigative or prosecuting functions of any department or agency in any litigation arising out of a dispute” handled by CRS. Any CRS member who breaks the confidentiality mandate may be prosecuted for a federal misdemeanor offense under the CRA. 42 U.S.C. §§ 2000g-1, 2000g-2. CRS is also required under the CRA to submit an annual report due to Congress each January 31. 42 U.S.C. § 2000g-3.

In addition, the CRA conferred CRS a mediating role in federal judicial proceedings. The Act gave district courts authority to refer parties in CRA public accommodation cases to CRS for settlement proceedings during which CRS is authorized to “make a full investigation of any complaint referred to it by the court under [42 U.S.C. § 2000a-3(d)] and may hold such hearings . . . to bring about a voluntary settlement between the parties.” 42 U.S.C. §§ 2000a-3, 2000a-4.

FHA: The FHA recognizes CRS’s conflict resolution and prevention role in the housing discrimination context, and directs the Secretary of Housing and Urban Development to “cooperate with and render such technical and other assistance to” CRS “to further its activities in preventing or eliminating discriminatory housing practices” that violate 42 U.S.C. §§ 3604, 3605, 3606, 3617. 42 U.S.C. § 3608(e)(4).

¹ CRS, which is headed by a Presidentially-appointed, Senate-confirmed Director who receives a four-year appointment (42 U.S.C. § 2000g), was first placed in the Commerce Department in 1964. In 1966, Congress approved President Lyndon B. Johnson’s “Reorganization Plan No. 1 of 1966” to move CRS into the Justice Department. President Johnson described the intent of the transfer as follows: “The Community Relations Service, brought into closer relationship with the Attorney General and the Civil Rights Division of the Department of Justice, will gain by becoming a primary resource in a coordinated effort in civil rights under the leadership of the Attorney General.”

CAPA: The CAPA strengthened existing 18 U.S.C. § 247 to provide for a more robust protection of religious properties and free exercise of religion, as well as protection from destructive conduct targeting religious properties and communities. CAPA directs CRS to “prevent, and respond to potential violations” of 18 U.S.C. § 247 (damage to religious property and interference with free exercise of religion) and § 844 (destructive conduct using fire, bombs, or other explosives).

Emmett Till Act: The 2007 Emmett Till Act requires CRS “to provide technical assistance by bringing together law enforcement agencies and communities in the investigation of violations of criminal civil rights statutes,” as such violations that resulted in death are being investigated by the Civil Rights Division (“CRT”) and the Federal Bureau of Investigation (“FBI”). Pub. L. 110-344, § 6(b). In reauthorizing the Emmett Till Act in 2016, Congress further required CRT, FBI, and CRS to hold regular meetings with various stakeholders to “discuss the status of the Department’s work under this Act.” Congress then further directed CRS to “provide technical assistance by bringing together law enforcement agencies and communities to address tensions raised by Civil Rights era crimes.” Pub. L. 114-325, § 2.

HCPA: In enacting the HCPA, Congress created a new federal hate crime statute in 18 U.S.C. § 249 (bodily injury or attempted/threatened bodily injury based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability). In connection with the HCPA, Congress increased CRS’s funding for additional personnel and directed CRS to “prevent and respond to alleged violations” of 18 U.S.C. § 249. Pub. L. 111-84, §§ 4706, 4707.

Summary of Core Functions

1. High-Profile Critical Incident Response, De-Escalation, and Conflict Resolution
2. Violence Prevention and Related Community Conflict Resolution
3. Hate Crime/Incident Prevention and Related Community Conflict Resolution
4. Training and Support for Law Enforcement Agencies
5. Public Safety Consultation with Religious Groups and Community Groups

Current Composition & Structure

- Headquarters: 8 FTE
 1. Associate Director: 1
 2. Administration & Finance: 3
 3. Legal/FOIA: 2
 4. Training & Program Development: 1
- Field: 10 FTE in 9 field offices (until March 2025: 25 field offices)
- Administrative Leave under Deferred Resignation Program: 35 FTE
- Contractors (CGI): 2

Budget and Staffing History

- FY2017: \$15.5M | 40 FTE
- FY2018: \$15.4M | 37 FTE
- FY2019: \$15.5M | 32 FTE
- FY2020: \$16.0M | 27 FTE
- FY2021: \$18.0M | 30 FTE
- FY2022: \$21.0M | 34 FTE
- FY2023: \$25.0M | 53 FTE
- FY2024: \$24.0M | 52 FTE
- FY2025: \$24.0M | 56 FTE



Washington, DC 20530

DATE: January 31, 2025

TO: Nikki Collier, Chief of Staff, Justice Management Division

FROM: Julius Nam, Associate Director & Supervisory Official, CRS

RE: Certification Re Compliance with Executive Order *Defending Women*

The Community Relations Service (CRS) is submitting the following certification regarding the Initial Guidance Regarding President Trump's Executive Order *Defending Women* ("Initial Guidance") issued by the Office of Personnel Management on January 29, 2025. CRS has conducted the review required in 1.b through 1.k of the Initial Guidance. CRS is in compliance with the Initial Guidance with the following clarifying explanation.

In addition to the Civil Rights Act of 1964, the Matthew Shepard and James Byrd Jr. Hate Crimes Prevention Act of 2009 (HCPA) is a statute that provides for CRS's jurisdictional mandate. The HCPA directs CRS to "prevent and respond to alleged violations" of this act that cause, threaten to cause, or attempt to cause bodily injury to persons "because of the actual or perceived race, color, religion, or national origin" or "**gender**, sexual orientation, **gender identity** or disability" of any persons. Because of this jurisdictional mandate, most of CRS's materials, both internal and outward-facing, have included references to "gender" and "gender identity" as part of their citations to or descriptions of the HCPA.

As of today, CRS has removed references to "gender" and "gender identity" from our website and other outward-facing materials and have identified internal documents that make the same references with the goal of making revisions where necessary. CRS has also given instructions to employees to comply with this Executive Order and Initial Guidance in all their oral and written communications as part of their work for CRS in communities.

Moreover, CRS is in the process of receiving guidance from OASG on how to implement this Executive Order and Initial Guidance while maintaining CRS's ability to follow its jurisdictional mandate. CRS hopes to receive clear guidance from OASG in the coming weeks.

To the best of my knowledge, I know the above to be true. I so certify.

Julius J. Nam, Associate Director & Supervisory Official

Produced for Congress



U.S. Department of Justice
Community Relations Service

Washington, DC 20530

DATE: February 7, 2025

TO: Chris Alvarez, Deputy Assist Attorney General / Controller, Justice Management Division

FROM: Julius Nam, Associate Director & Supervisory Official, CRS

RE: Certification re Compliance with the Attorney General's Memo "Rescinding 'Environmental Justice' Memoranda"

The Community Relations Service (CRS) is in full compliance with the Attorney General's memo, "Rescinding 'Environmental Justice' Memoranda." CRS has reviewed all its memoranda, guidance, and directives applicable to CRS. There are no materials currently in force that includes or continues previous administration's "environmental justice" agenda.

To the best of my knowledge, I know the above to be true. I so certify.

Julius J. Nam
Associate Director & Supervisory Official



U.S. Department of Justice
Community Relations Service

Washington, DC 20530

DATE: March 14, 2025

TO: Jolene Ann Lauria, Assistant Attorney General for Administration

FROM: Julius Nam, Associate Director & Supervisory Official, CRS

RE: Certification re Compliance with the Attorney General’s Memo “Eliminating Internal Discriminatory Practices”

The Community Relations Service (CRS) has reviewed all its internal and outward-facing materials and practices referenced below. I certify that CRS is in full compliance with the Attorney General’s memo, “Eliminating Internal Discriminatory Practices,” as further attested to below.

1. Confirming the termination, to the maximum extent allowed by law, of all DEI, DEIA, and “environmental justice” programs, offices, and positions (including but not limited to “Chief Diversity Officer” or similar positions); all “equity action plans”, “equity” actions, initiatives, or programs; all “equity-related” grants or contracts; and all DEI or DEIA performance requirements for employees, contractors, suppliers, vendors, or grantees;

CRS has not had any DEI, DEIA, “equity,” “equity action,” or “equity-related” matters listed above. Thus, termination was not needed as to those. As for matters involving “environmental justice,” during the prior administration, CRS participated in a multi-component “environmental justice” working group managed by ENRD. In addition, CRS has identified approximately six matters from cases during the prior administration that contained issues that may be construed to be “environmental justice” issues. Since January 20, 2025, CRS has terminated involvement in all “environmental justice” and related matters.

In addition, CRS has removed all references from its internal and outward-facing materials and practices (including from in training, programs, policies, and guidelines) that may be interpreted to be related to DEI, DEIA, “equity action,” “environmental justice,” “unconscious bias,” “cultural sensitivity,” “inclusive leadership,” and emphasis on race- or sex-based criteria rather than merit.

2. Identifying agency or department DEI, DEIA, or “environmental justice” positions, committees, programs, services, activities, budgets, and expenditures in existence on November 4, 2024, and providing an assessment of whether these positions, committees, programs, services, activities, budgets, and expenditures have been misleadingly relabeled in an attempt to preserve their pre-November 4, 2024, function;

CRS has not had any DEI, DEIA, or “environmental justice” matters listed above.

3. Identifying federal contractors, suppliers, vendors, and grantees who have provided DEI training or DEI training materials to agency or department employees since January 20, 2021;

CRS has not had involvement in any DEI or DEIA matters listed above, including in vendor contracts and budget materials.

4. Identifying federal grantees who received federal funding to provide or advance DEI, DEIA, or “environmental justice” programs, services, or activities since January 20, 2021;

CRS is not a grant-making component. CRS has not had involvement in grants that provided or advanced DEI, DEIA, or “environmental justice” matters listed above.

5. Assessing the operational impact (e.g., the number of new DEI hires) and cost of the prior administration’s DEI, DEIA, and “environmental justice” programs and policies;

CRS was not involved in any DEI or DEIA hiring, program development, or policy setting and implementation of the prior administration. CRS’s involvement in “environmental justice” related cases was minimal, involving only approximately six matters where CRS field staff conducted assessments and held a small number of community conversations to facilitate enforcement agencies’ understanding of community concerns. Similarly, CRS’s involvement in the prior administration’s “environmental justice” working group was minimal, only involving meeting attendance and response to data calls.

6. Recommending actions to align Department programs, activities, policies, regulations, guidance, employment practices, enforcement activities, contracts (including set-asides), grants, consent orders, and litigating positions with requirement of equal dignity and respect.

At this time, CRS does not have any specific recommendations.

To the best of my knowledge, I certify that the above is true.

Julius J. Nam
Associate Director & Supervisory Official

Produced for Congress



U.S. Department of Justice
Community Relations Service

Washington, DC 20530

DATE: April 14, 2025
TO: Jolene Ann Lauria, Assistant Attorney General for Administration
FROM: Julius Nam, Associate Director & Supervisory Official, CRS
RE: Certification re Compliance with the Attorney General's Memo "Eliminating Internal Discriminatory Practices"

The Community Relations Service ("CRS") has reviewed all its internal and outward-facing materials and practices referenced below. I certify that CRS is in full compliance with the Attorney General's memo, "Eliminating Internal Discriminatory Practices," as further attested to below.

1. Confirming the termination, to the maximum extent allowed by law, of all DEI, DEIA, and "environmental justice" programs, offices, and positions (including but not limited to "Chief Diversity Officer" or similar positions); all "equity action plans", "equity" actions, initiatives, or programs; all "equity-related" grants or contracts; and all DEI or DEIA performance requirements for employees, contractors, suppliers, vendors, or grantees;

CRS has not had any DEI, DEIA, "equity," "equity action," or "equity-related" matters listed above. Thus, termination was not needed for those action items. As for matters involving "environmental justice," during the prior administration, consistent with the now-rescinded Executive Order 14008 ("EO 14008"), CRS participated in a multi-component "environmental justice" working group managed by Environmental Natural Resources Division ("ENRD"). In addition, CRS has identified approximately six matters from cases during the prior administration that contained issues that may be construed to be "environmental justice" issues. Since January 20, 2025, however, CRS has terminated involvement in all "environmental justice" and related matters.

In addition, CRS has removed all references from its internal and outward-facing materials and practices (including those in training, programs, policies, and guidelines) that may be interpreted to be related to DEI, DEIA, "equity action," "environmental justice," "unconscious bias," "cultural sensitivity," "inclusive leadership," and emphasis on race- or sex-based criteria rather than merit.

2. Identifying agency or department DEI, DEIA, or “environmental justice” positions, committees, programs, services, activities, budgets, and expenditures in existence on November 4, 2024, and providing an assessment of whether these positions, committees, programs, services, activities, budgets, and expenditures have been misleadingly relabeled in an attempt to preserve their pre-November 4, 2024, function;

Currently, CRS does not have any DEI, DEIA, or “environmental justice” matters described above. Consistent with EO 14008, CRS previously created a CRS Senior Advisor for Environmental Justice and Hate Crimes Prevention Act/Disability Status-Related Affairs position, which it designated as its National Program Manager for Environmental Justice (“NPMEJ”) to comply with EO 14008. This position, however, has been vacant since June 3, 2023.

3. Identifying federal contractors, suppliers, vendors, and grantees who have provided DEI training or DEI training materials to agency or department employees since January 20, 2021;

CRS has not had involvement in any DEI or DEIA matters listed above, including in vendor contracts and budget materials.

4. Identifying federal grantees who received federal funding to provide or advance DEI, DEIA, or “environmental justice” programs, services, or activities since January 20, 2021;

CRS is not a grant-making component. Thus, CRS has not had involvement in grants that provided or advanced DEI, DEIA, or “environmental justice” matters listed above.

5. Assessing the operational impact (e.g., the number of new DEI hires) and cost of the prior administration’s DEI, DEIA, and “environmental justice” programs and policies;

CRS has not been involved in any DEI or DEIA hiring, program development, or policy setting and implementation of the prior administration’s initiatives described above. CRS’s involvement in “environmental justice” related cases was consistent with EO 14008, involving matters, where CRS NPMEJ and field staff conducted assessments, developed training and held community conversations to facilitate enforcement agencies’ understanding of community concerns. Similarly, consistent with EO 14008, CRS’s involvement in the “environmental justice” working group included meeting attendance and responses to data calls.

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6. Recommending actions to align Department programs, activities, policies, regulations, guidance, employment practices, enforcement activities, contracts (including set-asides), grants, consent orders, and litigating positions with requirement of equal dignity and respect.

At this time, CRS does not have any specific recommendations.

To the best of my knowledge, I certify that the above is true.



Julius J. Nam
Associate Director & Supervisory Official
Community Relations Service