

## **RECOMMENDED ACTION MEMO**

**Agency:** Department of Justice, Office for Victims of Crime (OVC)  
**Topic:** Make Community Violence a Special Focus Area within OVC  
**Date:** November 2020

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**Recommendation: Make community violence a special focus area of the Office for Victims of Crime Training and Technical Assistance Center.**

### **I. Summary**

#### **Description of recommended executive action**

Several community violence intervention (CVI) programs have proven effective at reducing gun violence in neighborhoods that are disproportionately impacted by the issue. Research has shown these interventions—including group violence intervention, evidenced-based street outreach, and hospital-based violence intervention—reduce violence without increasing the footprint of law enforcement officers. To support community organizations and public agencies in implementing and scaling CVI programs, the next administration should make community violence a special focus area of the Department of Justice (DOJ) Office for Victims of Crime’s Training and Technical Assistance Center (OVC TTAC). This CVI “focus area” would provide training materials, technical assistance, and, where possible, grant funding to help scale evidenced-based gun violence interventions.

#### **Overview of process**

Every year, the director of DOJ’s Office for Victims of Crime (OVC) is empowered to spend up to 5% of funding available for distribution within the Crime Victims Fund (CVF) to support programs that provide assistance to victims of crime.<sup>1</sup> Currently, the OVC director allocates some of these funds to support special focus areas within the OVC TTAC dedicated to combatting certain types of crimes, including human trafficking, terrorism, and tribal victim assistance. These focus areas provide valuable resources for organizations and agencies that work to prevent these crimes and support victims. Given the flexibility of the language in the statutory authorization of the CVF, the OVC director currently has the authority to immediately establish community violence as a special focus area of the OVC TTAC.

### **II. Current state**

#### **Gun violence is concentrated in a few centralized areas**

On average, nearly 40,000 Americans are killed by guns each year—an average of 100 per day—and an additional 100,000 people are injured.<sup>2</sup> While these figures tell a tragic story nationally, their impact is felt most profoundly in certain communities. As with homicide in general, gun homicide (which makes up the vast majority of murders in America) tends to

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<sup>1</sup> 34 U.S.C. §§ 20101(d)(4)(C); 20103(c). Each year Congress, as a part of appropriation for the DOJ, sets the obligation cap for the Crime Victims Fund, which limits the CVF funds available for distribution.

<sup>2</sup> CDC, Web-based Injury Statistics Query and Reporting System (WISQARS), “Fatal Injury Reports,” <https://www.cdc.gov/injury/wisqars>. Figures represent an average of five years: 2013 to 2017.

cluster disproportionately in dense urban areas, particularly within impoverished communities of color. In 2015, half of all gun homicides in the US took place in just 127 cities; together, these cities contained less than a quarter of the country's population.<sup>3</sup> In American cities with significant populations of communities of color, such as New Orleans, Detroit, and Baltimore, the homicide rate rises up to 10 times higher than the national average.<sup>4</sup>

Black Americans in particular are disproportionately impacted by the gun violence epidemic, as they experience nearly 10 times the gun homicides, 15 times the gun assaults, and three times the fatal police shootings of white Americans.<sup>5</sup> In Chicago, for example, although Black residents comprise about one-third of the city's population, they made up almost 80% of homicide victims in both 2015 and 2016.<sup>6</sup> This phenomenon is even more acute among young Black men aged 15 to 34, who made up over half of the city's homicide victims, despite accounting for just 4% of the city's population. In contrast, white Chicagoans comprised about one-third of the city's population but made up approximately 5% of the city's homicide victims.<sup>7</sup>

Large concentrations of gun violence are also seen in particular neighborhoods within a single city. For example, in one area of Rochester, NY, a study found that young Black men experienced a murder rate of 520 per 100,000—over 100 times higher than the national average.<sup>8</sup> In Boston, 53% of the city's gun violence occurs in less than 3% of the city's intersections and streets.<sup>9</sup>

This high concentration of violence creates a vicious cycle,<sup>10</sup> and children who grow up in these neighborhoods are often exposed to the consequences of gun violence. A study of adolescents participating in an urban violence intervention program showed that 26% of participants had witnessed a person being shot and killed, while *half* had lost a loved one to gun violence.<sup>11</sup> The impact of this is compounded because exposure to firearm violence—being shot, being shot at, or witnessing a shooting—doubles the probability that a young person will commit a violent act within two years.<sup>12</sup> In other words, exposure to violence perpetuates further violent behavior, creating a chain of killing and violence that will continue, absent an intervention.

## CVI programs are proven to reduce gun violence

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<sup>3</sup> Everytown for Gun Safety, "City Gun Violence," accessed September 1, 2020, <https://everytown.org/issues/city-gun-violence/>.

<sup>4</sup> Ted Heinrich, "Problem Management: The Federal Role in Reducing Urban Violence," accessed October 27, 2020, <https://perma.cc/TTM8-QTLB>.

<sup>5</sup> Everytown for Gun Safety, "Impact of Gun Violence on Black Americans," accessed September 1, 2020, <https://everytown.org/issues/gun-violence-black-americans/#learn-more>.

<sup>6</sup> The University of Chicago Crime Lab, "Gun Violence in Chicago, 2016," January 2017, 13, <https://urbanlabs.uchicago.edu/attachments/c5b0b0b86b6b6a9309ed88a9f5bbe5bd892d4077/store/82f93d3e7c7cc4c5a29abca0d8bf5892b3a35c0c3253d1d24b3b9d1fa7b8/UChicagoCrimeLab%2BGun%2BViolence%2Bin%2BChicago%2B2016.pdf>

<sup>7</sup> *Id.*

<sup>8</sup> David M. Kennedy, *Don't Shoot: One Man, A Street Fellowship, and the End of Violence in Inner-City America* (Bloomsbury USA, 2011): 14.

<sup>9</sup> Anthony A. Braga, Andrew V. Papachristos, & David M. Hureau, "The Concentration and Stability of Gun Violence at Micro Places in Boston, 1980–2008," *Journal of Quantitative Criminology* 26, no. 1,

<sup>10</sup> Giffords Law Center to Prevent Gun Violence, "Intervention Strategies," accessed September 1, 2020, <https://lawcenter.giffords.org/gun-laws/policy-areas/other-laws-policies/intervention-strategies/>.

<sup>11</sup> Jonathan Purtle et al., "Scared safe? Abandoning the Use of Fear in Urban Violence Prevention Programmes," *Injury Prevention*, 21, no. 2 (2015), <https://injuryprevention.bmj.com/content/21/2/140>.

<sup>12</sup> Jeffery B. Bingenheimer, Robert T. Brennan, and Felton J. Earls, "Firearm Violence, Exposure and Serious Violent Behavior," *Science* 308 (2005): 1323–1326.

Research and case studies have shown that through a combination of low-cost, CVI programs and much-needed firearms policy reforms, gun violence rates in communities of color can be cut in half in as little as two years. These CVI programs provide comprehensive support to individuals who are at greatest risk of gunshot victimization. There are three main categories of CVI programs: group violence intervention programs, evidenced-based street outreach programs, and hospital-based violence intervention programs.

#### A. Group violence intervention (GVI) programs

GVI programs are structured around the fact that gun violence often impacts a very small and identifiable segment of a community. These programs seek to reach those individuals most at risk of gun violence and provide them with support to avoid future violent interactions. GVI programs have a few basic components:<sup>13</sup>

- *Form the team*: assemble a team of leaders from law enforcement, social service agencies, and organizations who have roots and connections to the community.
- *Gather the data*: identify the individuals most at risk for either committing or becoming victims of gun violence.
- *Communicate the message*: the team meets with the individuals and lets them know that the community cares about their wellbeing and safety, but that the shooting must stop.
- *Provide support*: the team provides resources to the individuals, including job and health supports. The team also supplies a single phone number that individuals can call to connect them to needed services in the future.
- *Follow through*: if a homicide occurs, the team follows through. Legal action is taken against responsible parties, but the program continues to support the individuals it has connected with.

A literature review of GVI-related programs, conducted in 2012, found that nine of the 10 eligible studies on GVI reported strong and statistically significant crime reductions due to the intervention.<sup>14</sup> Additional studies of specific programs include:

- Chicago. The city's Group Violence Reduction Strategy was associated with a 23% reduction in overall shooting behavior and a 32% reduction in gunshot victimization for target groups compared to similar groups that did not experience GVI.<sup>15</sup>

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<sup>13</sup> Giffords Law Center, "Healing Communities in Crisis," March 10, 2016, 19-21, <https://giffords.org/lawcenter/report/healing-communities-in-crisis-lifesaving-solutions-to-the-urban-gun-violence-epidemic/>.

<sup>14</sup> Anthony A. Braga & David L. Weisburd, "The Effects of 'Pulling Levers' Focused Deterrence Strategies on Crime," 8 *Campbell Systematic Reviews* 6 (2012).

<sup>15</sup> Andrew V. Papachristos and David S. Kirk, "Changing the Street Dynamic: Evaluating Chicago's Group Violence Reduction Strategy," *Criminology & Public Policy* 14 (2015): 525–58.

- Cincinnati. The Cincinnati Initiative to Reduce Violence was associated with a 35% reduction in monthly group-related homicides and a 21% reduction in monthly total shootings.<sup>16</sup>
- New Haven. Project Longevity created a significant reduction of nearly five group-related shootings and homicides per month.<sup>17</sup>
- New Orleans. In 2012, New Orleans instituted a Group Violence Reduction Strategy, which led to a 17% reduction in overall homicides, 32% reduction in group-related homicides, 26% reduction in homicides that involved young Black male victims, and 16% reduction in both lethal and nonlethal firearms violence.<sup>18</sup>

#### B. Evidenced-based street outreach programs

Based on research that shows exposure to violence begets violence, street outreach programs treat gun violence as a communicable disease and try to interrupt its spread among the community. Specifically, these programs employ two groups of individuals—violence interrupters and outreach workers—to try to prevent the occurrence of violence.

Violence interrupters are part of the community and understand the dynamics of a particular neighborhood. They connect with individuals most at-risk to being exposed to or participating in gun violence, and try to mediate conflicts before they become violent. Meanwhile, outreach workers connect at-risk individuals to social support services.

Street outreach programs have been shown to be successful in reducing homicides and shootings.

- Chicago: CeaseFire-Chicago, a street outreach program implemented in several neighborhoods, was associated with statistically significant declines—ranging from 16% to 28%—in actual and attempted shootings.<sup>19</sup>
- Crown Heights, Brooklyn: An analysis of the Crown Heights Save Our Streets program showed that gun violence in Crown Heights was 20% lower than what it would have been relative to adjacent neighborhoods; the study also showed more than 100 potentially deadly conflicts involving 1,000 people were mediated through the program.<sup>20</sup>

#### C. Hospital-based violence intervention programs (HVIPs)

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<sup>16</sup> Robin S. Engel, Nicholas Corsaro, & Marie Skubak Tillyer, "Evaluation of the Cincinnati Initiative to Reduce Violence (CIRV)," University of Cincinnati Policing Institute (2010).

<sup>17</sup> Michael Sierra-Arevalo, Yanick Charette, & Andrew V. Papachristos, "Evaluating the Effect of Project Longevity on Group-Involved Shootings and Homicides in New Haven, CT," Institution for Social and Policy Studies (2015).

<sup>18</sup> Nicholas Corsaro & Robin S. Engel, "Most Challenging of Contexts Assessing the Impact of Focused Deterrence on Serious Violence in New Orleans," *Criminology & Public Policy* 14, no. 3, (2015): 471–505.

<sup>19</sup> Wesley G. Skogan et al., "Evaluation of CeaseFire-Chicago," March 20, 2008, <https://www.ncjrs.gov/pdffiles1/nij/grants/227181.pdf>.

<sup>20</sup> Sarah Picard-Fritsche & Lenore Cerniglia, "Testing a Public Health Approach to Gun Violence: An Evaluation of Crown Heights Save Our Streets, a Replication of the Cure Violence Model," (2013), [http://www.courtinnovation.org/sites/default/files/documents/SOS\\_Evaluation.pdf](http://www.courtinnovation.org/sites/default/files/documents/SOS_Evaluation.pdf).

HVIPs focus services on young adults who are in the hospital due to a gunshot injury. These individuals are at an especially high risk for being involved in another gun violence incident in the future. HVIPs connect these young adults to caseworkers, who can identify the patients' needs and the necessary resources to help.

HVIPs have been associated with both a decrease in gun injury recidivism and a decrease in associated health care costs.

- San Francisco. Over a six-year period, the San Francisco Wraparound Project, an HVIP, was associated with a 400% decrease in repeat gun injuries.<sup>21</sup>
- Baltimore. A study of HVIPs in Baltimore found that these interventions reduced the injury recidivism rate by roughly 20%, which produced an estimated savings of \$598,000 in health care costs.<sup>22</sup>
- Indianapolis. Project Prescription for Hope had a one-year gun injury recidivism rate of 0% relative to 8.7% for a historical control group.<sup>23</sup>

### **The OVC can be a resource for community violence intervention programs**

Communities that face the most significant threat from gun violence often lack resources to start and scale new CVI programs.<sup>24</sup> Therefore, while CVI programs are organized and staffed at the community level, support from the federal government via funding and technical assistance could help the organizations running these programs on the ground.

Congress must step up and provide additional funding to scale CVI programs.<sup>25</sup> However, in the interim, the OVC could use existing funding and authority to begin to provide these supports.

The OVC was formally established within the DOJ in 1988 and currently resides within the DOJ's Office of Justice Programs (OJP). The OVC's primary mission is to support victims of crime, and to improve attitudes, policies, and practices that promote justice through grants funded by the CVF.<sup>26</sup> According to the OVC, this mission is accomplished by: (1) administering the CVF, which was established by the Victims of Crime Act (VOCA) to provide funding for state victim compensation and assistance programs, (2) supporting direct services for victims, (3) providing training programs for service providers, (4) sponsoring the

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<sup>21</sup> Randi Smith et al., "Hospital-based Violence Intervention: Risk Reduction Resources That Are Essential for Success," *J. Trauma Acute Care Surg* 74, no. 4 (2013): 976–80.

<sup>22</sup> T.L. Cheng, et al., "Effectiveness of a Mentor-Implemented, Violence Prevention Intervention for Assault-injured Youths Presenting to the Emergency Department: Results of a Randomized Trial," *Pediatrics* 122 (2008): 938–46.

<sup>23</sup> G. Gomez et. al., "Project Prescription for Hope (RxH): Trauma Surgeons and Community Aligned to Reduce Injury Recidivism Caused by Violence," *Am. Surg.* 78 (2012): 1000–04.

<sup>24</sup> HUD Office of Policy Development & Research, "Neighborhoods and Violent Crime," Summer 2016, <https://www.huduser.gov/portal/periodicals/em/summer16/highlight2.html>.

<sup>25</sup> See, "Recommendations for the President's FY 2022 Budget Request."

<sup>26</sup> P.L. 98-473, Title II, Chapter XIV, Victims of Crime Act of 1984, October 12, 1984, 98 Stat. 2170. VOCA is codified at 34 U.S.C. §20101 et seq.

development of best practices for service providers, and (5) producing reports on best practices.<sup>27</sup>

The OVC administers the CVF funding available for distribution. The CVF does not receive appropriated funding. Rather, deposits to the CVF come from a number of sources, including criminal fines, forfeited bail bonds, penalties, and special assessments collected by the US attorneys' offices, federal courts, and the Federal Bureau of Prisons.<sup>28</sup> Each year Congress, as a part of appropriation for the DOJ, sets the obligation cap for the CVF, which limits funds available for distribution.

Most of CVF funding is statutorily directed to specific sources, including state agencies, US attorneys offices, and the Federal Bureau of Investigation (FBI). However, 5% of CVF funds are statutorily directed to grants made at the OVC director's discretion.<sup>29</sup> According to VOCA, discretionary grants must be distributed for: (1) demonstration projects, program evaluation, compliance efforts, and training and technical assistance services to crime victim assistance programs, (2) financial support of services to victims of federal crime, and (3) nonprofit victim service organizations and coalitions to improve outreach and services to victims of crime.<sup>30</sup>

In FY20, these discretionary grants totaled \$94.85 million, down from \$126.56 million in FY16, \$103.80 in FY17, \$178.84 in FY18, and \$125.90 in FY19.<sup>31</sup> The allocations reflect the funds allocated for, but not necessarily committed to, discretionary grants. For example, in FY16, \$125.27 million was committed for discretionary grants (\$1.29 million less than the annual allocation).

Currently, the OVC director uses some of its discretionary funds to support dedicated training in "special focus areas," including human trafficking, mass violence and terrorism, and tribal victim assistance.

### **III. Proposed action**

To increase support to community organizations and public agencies to implement CVI programs effectively, and thereby increase their prevalence and scope, the next administration should make community violence a special focus area of OVC TTAC. This CVI focus area would provide training materials, technical assistance, and, where possible, grant funding to help scale evidenced-based gun violence interventions.

#### **A. Functions of the CVI focus area**

Modeled after the existing human trafficking focus area within OVC TTAC,<sup>32</sup> the CVI focus area would:

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<sup>27</sup> OVC, "What We Do," accessed September 1, 2020, <https://ovc.ojp.gov/about/what-we-do>.

<sup>28</sup> 34 U.S.C. § 20101.

<sup>29</sup> 34 U.S.C. § 20101(4).

<sup>30</sup> 34 U.S.C. § 20103(c).

<sup>31</sup> Congressional Research Service, "The Crime Victims Fund: Federal Support for Victims of Crime," April 2, 2020, <https://crsreports.congress.gov/product/pdf/R/R42672>.

<sup>32</sup> OVC TTAC, "Human Trafficking," accessed September 1, 2020, <https://www.ovcttac.gov/views/HowWeCanHelp/dspHumanTrafficking.cfm>.



- Provide technical assistance to CVI programs across the country. The CVI focus area would provide specialized training to DOJ grantees, provide instructions and advice for starting CVI programs, and share the latest evidence-based best practices to continuously improve CVI programs around the country. The TTAC already does this important work on other issues: TTAC’s human trafficking team sent trainers to support a multidisciplinary group interested in forming a human trafficking task force in Ohio;<sup>33</sup> sent trainers to South Carolina to train 200 mental health care providers, legislators, law enforcement officers, and hotel staff on how to identify human trafficking victims;<sup>34</sup> and regularly offers personalized training on topics like “best fiscal practices in grant management,” “ethics and confidentiality in victim services,” and “program evaluation.”<sup>35</sup>
- Offer professional development grants to CVI providers so that they can visit and learn from each other. The CVI focus area would provide small grants ranging from \$1,000-\$5,000 to allow CVI professionals to visit existing CVI programs and learn from them.<sup>36</sup> The TTAC currently offers similar assistance to human trafficking professionals: the TTAC helped facilitate and pay for a group of Texas human trafficking task force members to visit and shadow a human trafficking victim service organization in Georgia, so that Texas would be better equipped to design a statewide protocol for the provision of services to victims of human trafficking.<sup>37</sup>
- Where possible, provide programming grants to communities to create CVI programs. The OVC occasionally provides funding to communities and organizations that wish to start or grow CVI programs.<sup>38</sup> The CVI focus area could continue to provide support for these programs through discretionary grants.
- Establish a centralized database to track the effectiveness of these interventions. One of the most valuable contributions of a federal training focus area will be its ability to collect data on the effectiveness of these programs. Currently, the OVC does this for its human trafficking grant recipients: the Trafficking Information Management System (TIMS) serves as a centralized repository for grant-required performance metrics for all of OVC’s human trafficking grant programs.<sup>39</sup>
- Provide a national network for CVI providers. The CVI focus area would provide a centralized place for organizations, agencies, and researchers to share research and

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<sup>33</sup> OVC TTAC, “Human Trafficking: How We Can Help,” accessed September 1, 2020, <https://www.ovcttac.gov/views/HowWeCanHelp/dspHumanTrafficking.cfm>.

<sup>34</sup> *Id.*

<sup>35</sup> See e.g., OVC TTAC, “How We Can Help: Training,” accessed September 1, 2020, <https://www.ovcttac.gov/views/TrainingMaterials/dspTrainingByRequest.cfm>; OVC TTAC, “How We Can Help: Training Technical Assistance,” accessed September 1, 2020, <https://www.ovcttac.gov/views/HowWeCanHelp/dspTrainingTechnicalAssistance.cfm>.

<sup>36</sup> OVC TTAC, “Professional Development Scholarships,” accessed September 1, 2020, <https://www.ovcttac.gov/views/HowWeCanHelp/dspPDScholarship.cfm>.

<sup>37</sup> *Supra* note 35.

<sup>38</sup> See e.g., “Make it Happen: Addressing Trauma Among Young Men of Color,” Grant awarded 2015, accessed October 27, 2020, <https://ovc.ojp.gov/funding/awards/2015-vf-gx-k037>.

<sup>39</sup> OVC TTAC, “TIMS Snapshot Report: Services for Victims of Human Trafficking,” July 2018–June 2019, <https://ovc.ojp.gov/sites/g/files/xyckuh226/files/media/document/tims-snapshot-report-2018-2019.pdf>.

best practices. In the context of human trafficking, the TTAC has set up an online portal, where grantees and others who have worked with the TTAC can share resources.<sup>40</sup>

#### B. CVI focus area funding

Funding for the CVI focus area would come from the OVC director's existing discretionary authority over 5% of CVF funds.<sup>41</sup> While the exact funding level available changes every year depending on where the distribution cap for the CVF is set, \$311,010,988 was available in FY2019 for the OVC director to use at her discretion.<sup>42</sup>

### **IV. Legal justification**

**The OVC has the legal authority to create a focus area for CVI programs and fund it through the OVC director's discretionary funds.** As previously discussed, the OVC receives funding from the CVF every year. These funds are statutorily allocated.

- \$10 million is allocated for child abuse prevention and treatment.<sup>43</sup>
- Additional funds are directed to the US Attorneys' Offices and the FBI to support both agencies' provision of services for victims of federal crimes and to create a Victim Notification System.<sup>44</sup>
- Remaining funds are divided into three parts: 47.5% is allocated to crime victim compensation; 47.5% becomes grants for crime victim assistance that are allocated to state agencies by a formula; and 5% is made available for allocation pursuant to the OVC director's discretion.<sup>45</sup>

When determining how to spend the discretionary allocation, the OVC director must comply with several statutory mandates. At least 50% of the director's grants must fall into two categories: grants for "victim services, demonstration projects, program evaluation, compliance efforts, and training and technical assistance services to eligible crime victim assistance programs"; and grants for "nonprofit neighborhood and community-based victim service organizations and coalitions to improve outreach and services to victims of crime."<sup>46</sup> Any OVC director grants that are not directed to either of these two categories must be directed to "the financial support of services to victims of Federal crime by eligible crime victim assistance programs."<sup>47</sup>

The OVC director has flexibility in determining exactly how to meet these statutory requirements when spending discretionary funds. The director of the OVC is permitted to use CVF funds made available to him or her "to carry out programs of training and special workshops for the presentation and dissemination of information resulting from demonstrations, surveys, and

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<sup>40</sup> OVC TTAC, "Human Trafficking Grantees Learning Community," accessed September 1, 2020, [https://www.ovcttac.gov/views/LearningCommunities/Trafficking/dspLC\\_HumanTrafficking.cfm](https://www.ovcttac.gov/views/LearningCommunities/Trafficking/dspLC_HumanTrafficking.cfm).

<sup>41</sup> 34 U.S.C. § 20101(4).

<sup>42</sup> OVC, "OVC Fiscal Year 2019 Awards," accessed October 27, 2020, <https://ovc.ojp.gov/media/image/3356>.

<sup>43</sup> 34 U.S.C. § 20101(d)(2).

<sup>44</sup> 34 U.S.C. § 20101(3).

<sup>45</sup> 34 U.S.C. § 20101(4).

<sup>46</sup> 34 U.S.C. § 20103(c).

<sup>47</sup> *Id.*



special projects.”<sup>48</sup> There are no additional requirements restricting the topics of these trainings, workshops, demonstrations, surveys, or special projects. Moreover, nothing in the language of VOCA or its accompanying regulations appear to prevent the OVC director from designating community violence intervention as a special topic, akin to human trafficking or mass violence, under OVC TTAC. Therefore, while the vast majority of CVF funds are distributed to federal or state agencies, the OVC has the statutory authority and the ability to create a resource and training center that is dedicated to CVI programs.

**CVI programs provide services to victims of gun violence.** When allocating these funds, the OVC should be mindful of VOCA’s definition of a “victim”. While there do not appear to have been legal challenges to how the OVC has allocated CVF grant funding in the past, it is conceivable that a party could argue that grants to community programs are not sufficiently directed to individual victims.

However, this argument is not likely to succeed. Significantly, VOCA’s definition of victim is intentionally general to encompass many forms of victims: “Crime victim or victim of crime means a person who has suffered physical, sexual, financial, or emotional harm as a result of the commission of a crime.”<sup>49</sup> Under this definition, all people in neighborhoods that experience high levels of violence would likely be considered “victims,” due to the psychological and emotional (if not physical) harm they endure. This, paired with the research showing perpetrators of gun violence and victims of gun violence are often the same people, lends credence to the position that even if CVI programs operate by first identifying perpetrators, these perpetrators are likely also future victims of violent crime, if they have not already been victims of violent crime.

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<sup>48</sup> 34 U.S.C. § 20103(c)(3)(E)(ii).

<sup>49</sup> 28 C.F.R. § 94.102.