Integrating a Public Health-Informed Approach into Online Youth Safety Policy

Preventing online harms related to hate-fueled and grievance-based violence and exploitation

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Introduction

Thank you for the opportunity to provide testimony and for your commitment and focus on such important issues.

My name is Jenna Hopkins and I serve as Deputy Director of Public Affairs at the Polarization & Extremism Research & Innovation Lab (PERIL) housed at American University's School of Public Affairs.

The purpose of this testimony is to highlight the importance of measures like those contained in SB 3264, the Online Safety Act, which aim to reduce polarization and targeted violence by strengthening youth protections and addressing underlying risk factors, thus safeguarding Illinois' youth.

This perspective is informed by PERIL's public health approach to preventing targeted violence. We design, test, and scale evidence-based tools that empower individuals, institutions, and communities to build resilience against manipulation and violence-inducing narratives, as well as recognize and interrupt pathways to violence early. Core to these challenges is addressing online spaces, particularly in terms of how they impact youth.

PERIL's approach emphasizes a public health model spanning primary (population-level prevention of root causes), secondary (targeted intervention at early signs of risk), and tertiary (post-incident mitigation to reduce recurrence) preventive approaches to addressing violence, though PERIL's position is that the greatest impact and cost-effectiveness lie in primary prevention.

Prevention activities are non-coercive and non-punitive. They should not infringe on constitutional rights to free speech or association; rather, they aim to promote community resilience, address structural and social vulnerabilities, and center community-identified needs – consistent with established public-health and violence-prevention models.

With that in mind, my testimony will focus on how to integrate a public health-informed approach into online youth safety policy, particularly regarding the prevention of harms related to hate-fueled and grievance-based violence and exploitation.

Public Health Informed Approach

In public health, primary prevention focuses on reducing risks before harm occurs by strengthening protective factors like belonging and institutional trust and reducing the conditions that make harmful narratives and behaviors more likely to take hold before harm occurs.[1]

[1] "Public Policy: Public Health and Prevention." Polarization & Extremism Research & Innovation Lab. 2024. https://perilresearch.com/wp-content/uploads/2025/01/PERIL-Public-Policy-Paper-2024.pdf; *William*

Long-term investments in primary prevention are essential to meaningfully reduce the volume of violence, along with the narratives that drive it over time.[2] In online spaces, primary prevention of polarization and targeted violence could include broad-based, evidence-driven efforts such as civic education, digital and media literacy, and other resilience-building initiatives that strengthen belonging and equip individuals to recognize and resist manipulation. It also could involve limiting the structural factors that erode the ability to deploy such measures, such as "infinite scroll" and other addictive qualities of certain tech platforms.[3]

At its core, the public health approach to preventing targeted violence asks key questions such as: *What are the risk factors that increase vulnerability to harm? What are the protective factors that reduce that risk? Where can systems intervene early to prevent escalation?* Using these questions to guide legislative design can help ensure solutions address root causes rather than symptoms – supporting proactive, scalable, and evidence-based interventions and reducing over-reliance on reactive or punitive approaches alone.

Several illustrative examples of how PERIL has addressed online harms, especially those impacting youth, include but are not limited to:

- PERIL's Developing and Using Critical Comprehension (DUCC) program, which equips K–5 students with foundational critical thinking, digital literacy, and social-emotional skills. Through a structured, standards-aligned curriculum, DUCC helps young people understand that not all online content is trustworthy, evaluate information from multiple perspectives, and make informed decisions, building resilience to manipulation before risk pathways emerge.[4]
- PERIL's prebunking and digital resilience interventions help individuals recognize common manipulation tactics – such as emotional provocation, scapegoating, and conspiracy framing – before they take hold. This approach draws on a growing body of research showing that "inoculating" individuals against misleading or

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Braniff. "Politically Violent Attacks: A Threat to Our Constitutional Order." U.S. Senate Committee on the Judiciary. October 28, 2025. https://www.judiciary.senate.gov/committee-activity/hearings/politically-violent-attacks-a-threat-to-our-constitutional-order.

[2] "Public Policy: Public Health and Prevention." Polarization & Extremism Research & Innovation Lab. 2024. https://perilresearch.com/wp-content/uploads/2025/01/PERIL-Public-Policy-Paper-2024.pdf; *William Braniff*. "Politically Violent Attacks: A Threat to Our Constitutional Order." U.S. Senate Committee on the Judiciary. October 28, 2025. https://www.judiciary.senate.gov/committee-activity/hearings/politically-violent-attacks-a-threat-to-our-constitutional-order.

[3] *U.S. Surgeon General*. "Social Media and Youth Mental Health Advisory." 2023. https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf; *Jean M. Twenge et al.* "Associations Between Screen Time and Lower Psychological Well-Being Among Children and Adolescents." Preventive Medicine Reports. 2018. https://pubmed.ncbi.nlm.nih.gov/30406005/.

[4] "Developing & Using Critical Comprehension." Polarization & Extremism Research & Innovation Lab. May 2025. https://perilresearch.com/projects/ducc/.

harmful narratives in advance can reduce susceptibility and improve critical evaluation of online content.[5]

- PERIL's "Not Just a Joke" guide, developed with partners including the Southern Poverty Law Center (SPLC), addresses how humor, memes, and "ironic" content can be used to normalize harmful narratives and lower social guardrails online. The guide provides practical tools for parents, educators, and practitioners to recognize when humor is being used as a gateway to more extreme content and to respond early, before normalization progresses to harm.[6]
- PERIL's "The Parents & Caregivers Guide to Online Youth Radicalization," produced together with the SPLC, was developed in response to proliferation of extremist spaces and content online that has created new and powerful avenues for the radicalization of young people. The guide aims to help parents, caregivers, and educators understand how extremists exploit online communication to target children and young adults and provides tangible steps to counter it.[7]

Considerations for Addressing Youth Online Harms

Young people today are navigating online environments that are not only sources of connection and creativity, but also spaces where manipulation and exploitation can occur resulting in hate-fueled and grievance-based harassment and violence.

For instance, Nihilistic Violent Extremism (NVE), a loosely connected, transnational network of extremist actors operating across multiple online platforms, has been linked to a growing number of cases in the U.S., including incidents involving minors and young adults.[8] Just last month, the U.S. Attorney's Office, Central District of Illinois called attention to these networks, specifically the "764" network, "that weaponiz[e] digital platforms to exploit and radicalize children."[9] Among other things, NVE networks like 764 normalize violence, reward notoriety, and exploit vulnerability, often targeting youth, at scale in digital spaces.[10]

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[5] *Jon Roozenbeek et al.* "Psychological Inoculation Improves Resilience Against Misinformation on Social Media." Science Advances. August 24, 2022. https://www.science.org/doi/10.1126/sciadv.abo6254.

[6] "Not Just a Joke: Understanding & Preventing Gender- & Sexuality-Based Bigotry." Polarization & Extremism Research & Innovation Lab, Southern Poverty Law Center. December 2024. https://www.learningforjustice.org/sites/default/files/2024-12/peril-not-just-joke.pdf.

[7] The Parents and Caregivers Guide to Online Youth Radicalization." Polarization & Extremism Research & Innovation Lab, Southern Poverty Law Center. June 2021. https://www.splcenter.org/resources/guides/peril-guide-online-youth-radicalization/.

[8] The FBI describes NVE's as "individuals who engage in criminal conduct within the United States and abroad, in furtherance of political, social, or religious goals that derive primarily from a hatred of society at large and a desire to bring about its collapse by sowing indiscriminate chaos, destruction, and social instability." See: Seamus Hughes, Peter Beck. "#122: Why 'Meaningless' Matters to the FBI." Court Watch. April 18, 2025. https://www.courtwatch.news/p/122-why-meaningless-matters-to-the-fbi.

[9] "The Frightening Reality of Online Predators." U.S. Attorney's Office, Central District of Illinois. March 18, 2026. https://www.justice.gov/usao-cdil/pr/frightening-reality-online-predators.

[10] "From sextortion to violence: The evolving threat of the 764 network in the US." Institute for Strategic Dialogue. November 12, 2025. https://www.isdglobal.org/digital_dispatches/from-sextortion-to-violence-

More broadly, online environments can also accelerate exposure to misogynistic, antisemitic, and other hate-fueled or grievance-based narratives that normalize harassment and dehumanization – dynamics that both drive immediate harms, such as bullying and exploitation, and, in some cases, contribute to pathways toward violence.[11]

That being said, vulnerability to online harms – as it largely relates to manipulation, exploitation, and radicalization – is not driven by a single cause, but by an accumulation of overlapping risk factors, which might commonly include:

- Disruption and instability (e.g., trauma, loss, major life transitions);
- Confusion and uncertainty, particularly during periods of social or global upheaval;
- Grievance and perceived injustice, often accompanied by blame or scapegoating;
- Social isolation and lack of belonging; and
- Search for identity, status, or community, including through rebellion or "edgy" online behavior.[12]

Emerging research reinforces this cumulative risk model. A recent study in *Terrorism and Political Violence* finds that individuals who engage in violent extremism tend to be, on average, 10 years younger than their nonviolent counterparts and to exhibit clusters of vulnerabilities, including grievance, social isolation, and impulsivity suggesting that youth may be particularly susceptible to the normalization and glorification of violence.[13] These risk factors should be addressed both individually and as a whole; and a public health approach allows for the broadest redress of them.

Promising Policy

Several proposals under consideration today, including SB 3264, reflect promising starting points for improving online safety. Across these efforts, a few key themes emerge that are particularly well-aligned with effective, durable, and prevention-focused approaches:

Strengthening Safety Infrastructure and Support Pathways: Policies that create accessible, in-platform safety resources – such as reporting tools, crisis support, and clear guidance – can enable earlier intervention and faster access to help. These

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the-evolving-threat-of-the-764-network-in-the-us/; "764." Institute for Strategic Dialogue. March 27, 2025. https://www.isdglobal.org/explainers/764/.

[11] "The Parents and Caregivers Guide to Online Youth Radicalization." Polarization & Extremism Research & Innovation Lab, Southern Poverty Law Center. June 2021. https://www.splcenter.org/resources/guides/peril-guide-online-youth-radicalization/.

[12] "Building Resilience & Confronting Risk." Polarization & Extremism Research & Innovation Lab, Southern Poverty Law Center. June 2021. https://perilresearch.com/resource/building-resilience-confronting-risk-a-parents-caregivers-guide-to-online-radicalization/.

[13] *Noah Turner, et al*. "Distinguishing Violent and Non-violent Criminal Extremists Based on Risk and Protective Factors." Terrorism and Political Violence. February 10, 2026. https://www.tandfonline.com/doi/full/10.1080/09546553.2025.2605135.

approaches are most effective when they meet users where harm occurs and provide clear, practical pathways for support before issues escalate.

- The "online safety center" established in SB 3264 reflects this approach by amassing resources for bullying prevention and mental health, reporting pathways for online harms, and educational information about the impact of such harms.

Prioritizing Preventive Design and Protective Defaults: Design choices play a critical role in shaping user experience and risk exposure. Efforts that reduce exposure to known risks – such as unwanted contact or unsafe interactions – can mitigate harm, such as exploitation or harassment, before it occurs. Similarly, limiting manipulative or autonomy-impairing design can help ensure that young users make informed decisions addressing well-documented concerns around manipulative or coercive design practices that increase exposure to harmful content.[14] Limiting features designed to significantly extend minors' use online also align with a growing body of evidence linking excessive use and algorithmically facilitated harms exposure to increased vulnerability among youth online.[15] More broadly, approaches that enhance privacy and data protections, improve reporting and response mechanisms, and address environmental and design factors that shape behavior can strengthen user safety by providing a greater degree of user control.

- SB 3264 reflects similar approaches under its dedicated section on "protections for minors" which aims to prevent platforms from impairing user autonomy and contribute to excessive platform engagement, among other things.

Grounding Policy in Consumer Frameworks and User Tools: Approaches rooted in consumer protection – focused on transparency, safeguards, and platform design – generally align with established state authority. By focusing on platform design and user protections, rather than directly regulating the substance of speech, these approaches may raise fewer First Amendment concerns than content-based regulation.[16] However, this largely depends on how provisions are structured and applied. Recent litigation, such as *Moody v. NetChoice (2024)* and *NetChoice v. Paxton (2024)*, highlight the challenges associated with laws that regulate platforms' editorial discretion over content.

- SB 3264 reflects this approach by seeking to ground enforcement in state consumer protection law, focusing on business practices and user safeguards rather than regulating speech, and appearing to align with established constitutional frameworks.

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[14] "Social Media and Youth Mental Health Advisory." U.S. Surgeon General. 2023. https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf.

[15] *Jean M. Twenge, Campbell, W. Keith Campbell.* "Associations between screen time and lower psychological well-being among children and adolescents: Evidence from a population-based study." Preventative Medicine Reports. December 2018. https://www.sciencedirect.com/science/article/pii/S2211335518301827.

[16] "Bringing Dark Patterns to Light." Federal Trade Commission. 2022. https://www.ftc.gov/reports/bringing-dark-patterns-light.

Taken together, these features position the proposed policies within a rights-protecting approach that uses existing legal frameworks while still meaningfully reducing risk, strengthening user resilience, and creating safer online ecosystems.

Recommendations to Strengthen Impact

Several proposals under consideration today, including SB 3264, represent commendable attempts to build a foundation to prevent youth online harms. To further enhance their impact, there may be opportunities to build on the strong foundation already created by: strengthening primary prevention efforts, expanding support systems and resources, building the evidence base and increasing access to data, centering youth in solutions, and ensuring effective and rights-respecting implementation.

Strengthening Primary Prevention Efforts: One potential area for further exploration is how these efforts might be complemented by more proactive, primary prevention-focused initiatives. This could be supported in several ways, including: public investment in civil society organizations to deliver prevention programming; requirements or incentives for companies to implement these measures directly; and/or government-led initiatives to provide resources and education at scale. Such initiatives might include:

- Digital and media literacy, including manipulation awareness, like PERIL's DUCC program.
- Educational and engagement initiatives that build resilience and belonging, like PERIL's "CARE" centers.[17]
- Online harms awareness resources and tools for trusted adults, parents, and caregivers like PERIL's previously mentioned guides.

Expanding Support Systems and Resources: Another area for consideration is how to further strengthen accessible support systems for youth and those around them, which might include:

- State government offices that can serve as a counterpart for online harms reduction and youth safety from a public health perspective, as opposed to law enforcement-only approaches.
- Consolidated state resources to make parents and caregivers aware of the risks and safety protocols available to them.
- Creating or enhancing access to helplines, reporting tools, and intervention resources for violence prevention, including that which is hate-fueled or grievance-based.

Building the Evidence Base and Increasing Access to Data: Given the rapidly evolving nature of online harms, continued investment in research, transparency, and data access can help ensure that approaches remain adaptive, effective, and evidence-informed. This may include supporting policies that enable responsible data access for researchers,

[17] "Community Advisory, Resource, and Education (CARE)." Polarization & Extremism Research & Innovation Lab. Accessed April 8, 2026. https://perilresearch.com/projects/community-advisory-resource-and-education-care/.

funding research and prevention programming, and incentivizing rigorously evaluated interventions to identify what works.

Centering Youth in Solutions: There may also be opportunities to further incorporate youth perspectives into the design and implementation of solutions. Efforts that empower young people – while avoiding overly restrictive approaches that could have unintended consequences – may be particularly effective. For example, the Boston Children's Hospital Digital Wellness Lab leads a standing Student Advisory Council to ensure that youth perspectives directly inform research, resources, and program design, helping align interventions with the lived experiences of those they are intended to serve.[18] A Youth Advisory Council or similar effort by the State could bolster the effectiveness of these programs.

Ensuring Effective and Rights-Respecting Implementation: Maintaining a focus on privacy, rights, and practical implementation is important, not only in themselves, but to maintain community trust in these approaches.

In sum, these considerations may help strengthen efforts to reduce risk, build resilience, and address the underlying conditions that contribute to harm.

Conclusion

By integrating a public health-informed, prevention-focused approach, the State of Illinois has the opportunity to lead in developing policies that are proactive, evidence-based, and responsive to how harm actually occurs in digital environments.

PERIL appreciates the Subcommittee's leadership and stands ready to support further refinement and implementation.

Thank you for your time and consideration.

[18] "Digital Wellness Lab Student Advisory Council." Boston Children's Digital Wellness Lab. Accessed April 8, 2026. https://digitalwellnesslab.org/student-advisory-council.