

PAGAN SOLIDARITY ALLIANCE

Policy Brief Series

Policy Brief No. 2026-01

Administrative Principles

Supporting the Practical Implementation of Religious Liberty

Policy recommendations for the effective administrative implementation of religious liberty within constitutional systems of government.

Prepared for the

Religious Liberty Commission

United States Department of Justice

July 2026

Advancing Religious Liberty Through Research, Dialogue, and Effective Governance

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PSA Policy Brief 2026-01

Executive Summary

Religious liberty is often understood primarily through constitutional law and judicial interpretation. While those foundations remain essential, the practical exercise of religious liberty depends equally upon the administrative systems by which government implements constitutional protections in everyday operations. Administrative classification systems, religious accommodation procedures, chaplaincy programs, demographic reporting, and institutional guidance are the mechanisms through which constitutional principles become lived realities for citizens interacting with public institutions.

This policy brief examines religious liberty from the perspective of public administration. Prompted by recent changes to Department of Defense religious classification systems, the Pagan Solidarity Alliance undertook a broader examination of the role administrative recognition plays in supporting the practical implementation of religious liberty throughout government. The resulting analysis extends beyond any single agency or religious tradition, focusing instead on enduring principles of effective governance applicable across federal institutions.

Central to this brief is the principle that administrative recognition should be understood as an operational function rather than a theological one. Government does not determine religious legitimacy; however, it must maintain administrative systems capable of accurately identifying, understanding, and serving the diverse religious communities that interact with public institutions. Classification systems that provide an appropriate level of specificity support more effective communication, demographic reporting, accommodation planning, chaplaincy resource allocation, and institutional continuity while preserving governmental neutrality toward religion.

To better understand the historical development of these administrative systems, the Alliance conducted an extensive review of constitutional authorities, federal statutes, judicial decisions, executive branch guidance, Department of Defense publications, public administration scholarship, and historical records. In addition, the Alliance initiated a coordinated five-request Freedom of Information Act (FOIA) research initiative seeking historical and current records concerning the evolution and administration of federal religious classification systems.

Based upon that analysis, this publication offers seven recommendations emphasizing transparency, administrative continuity, evidence-based decision-making, constructive engagement, and the maintenance of administrative recognition systems at an appropriate level of specificity. These recommendations are offered not as advocacy for any particular religious tradition, but as principles of sound public administration intended to strengthen the practical implementation of religious liberty for all.

The Pagan Solidarity Alliance respectfully submits this policy brief in the hope that it will contribute to informed discussion concerning the relationship between constitutional principle, effective governance, and the everyday administration of religious liberty within a pluralistic constitutional republic.

PART I

Foundations

I. Introduction

Religious liberty is often discussed in terms of constitutional rights, judicial decisions, and philosophical principles. Those foundations are indispensable, but they represent only part of the American experience of religious freedom. Constitutional protections become meaningful in everyday life only when they are implemented through the administrative systems that govern the interaction between citizens and public institutions.

For most Americans, religious liberty is not experienced in a courtroom. It is encountered through routine interactions with government. A service member requests a religious accommodation through military administrative channels. An incarcerated individual seeks access to clergy or religious materials through correctional procedures. A patient requests the services of a hospital chaplain. A government employee requests a workplace accommodation for religious observance. In each instance, constitutional principles are translated into lived experience through administrative policies, procedures, and decisions.

These administrative systems rarely attract public attention. They generally operate quietly in the background of government, providing the organizational structure necessary to implement constitutional obligations consistently across diverse populations and operational environments. When they function effectively, religious liberty is experienced as a practical reality rather than merely an abstract legal principle. When they function poorly, even well-established constitutional protections may become difficult to exercise in practice.

The purpose of this brief is not to revisit longstanding constitutional debates concerning the meaning or scope of religious liberty. Nor does it seek to advocate for preferential treatment for any particular religious tradition. Rather, this publication examines religious liberty through the perspective of public administration. It argues that effective administration—and the use of sufficiently specific administrative classification and recognition systems to implement constitutional responsibilities—serves as the practical bridge between constitutional principle and everyday implementation.

During 2026, publicly reported changes to military religious preference classifications prompted the Pagan Solidarity Alliance to examine the broader administrative principles underlying governmental systems of religious identification. That inquiry ultimately expanded beyond a single administrative action into a broader examination of how religious liberty is implemented through public administration. To better understand the historical development of these systems, the Alliance initiated a coordinated series of *Freedom of Information Act (FOIA)* requests seeking current and historical records, decision memoranda, implementation guidance, historical classification lists, and related administrative documentation concerning the evolution of federal religious recognition systems.

Although informed by issues affecting Pagan and other minority-faith communities, the observations presented here extend well beyond any single religious tradition. Administrative transparency, institutional continuity, organizational learning, constructive engagement, and effective recognition systems benefit governmental institutions and citizens alike, regardless of religious affiliation. These principles strengthen administrative capacity while reinforcing public confidence that governmental institutions are acting fairly, consistently, and within constitutional boundaries.

This perspective reflects a broader understanding of religious liberty. Constitutional guarantees establish legal rights. Courts interpret those rights when disputes arise. Legislatures establish statutory frameworks. Public administrators, however, carry the continuing responsibility of implementing those principles in thousands of routine decisions made every day throughout government. Their work represents the practical administration of religious liberty.

Accordingly, this brief offers recommendations grounded not in theology or partisan advocacy, but in principles of sound public administration. It seeks to contribute constructively to the Religious Liberty Commission's work by examining how administrative systems can better support the consistent, transparent, and effective implementation of constitutional protections.

Research Methodology

This policy brief is based upon a review of constitutional authorities, federal statutes, executive branch guidance, Department of Justice materials, Department of Defense publications, historical administrative records, judicial decisions, and relevant public administration literature.

In addition to publicly available materials, the Pagan Solidarity Alliance undertook an extensive documentary research effort concerning the administration of religious recognition within the United States military. During 2026, the Alliance submitted a series of Freedom of Information Act (FOIA) requests seeking historical and current records relating to military religious preference classifications, administrative decision-making, implementation guidance, historical change documentation, and related records. These requests remain pending at the time of publication.

The purpose of these requests is not to support litigation or advocacy, but to improve public understanding of how religious liberty is implemented through administrative systems and to encourage transparency, institutional continuity, and informed public discussion.

Scope

Although this brief was prompted by recent developments affecting military religious classification systems, the principles discussed herein apply broadly to public administration across all levels of government. The recommendations offered are intended to strengthen administrative implementation of religious liberty generally rather than to address any single agency or administrative action.

II. Historical Foundations of Religious Liberty Administration

Historical Context

The American tradition of religious liberty has never existed independently of government administration. From the earliest years of the Republic, constitutional principles required practical mechanisms through which they could be implemented. As governmental responsibilities expanded and the nation's religious landscape became increasingly diverse, administrative systems evolved alongside constitutional doctrine to accommodate changing operational realities.

Early public institutions generally operated within a relatively limited religious environment. Over time, however, immigration, demographic change, military service, correctional systems, higher education, health care, and other governmental functions required increasingly sophisticated methods for interacting with citizens representing a growing diversity of religious beliefs. Administrative systems developed gradually to meet those practical needs.

This evolution was not primarily theological. Government agencies were not tasked with determining religious truth or evaluating doctrinal legitimacy. Rather, they developed administrative mechanisms that enabled effective communication, accommodation, recordkeeping, chaplaincy services, demographic reporting, and other operational functions necessary to serve an increasingly pluralistic society while maintaining constitutional neutrality.

The Evolution of Administrative Recognition

Administrative recognition should be understood primarily as an operational tool rather than a statement concerning theological legitimacy. Classification systems, religious preference codes, chaplaincy guidance, accommodation procedures, and related administrative mechanisms exist because government must organize information in order to perform its functions effectively.

These systems allow agencies to identify accommodation needs, facilitate communication with religious organizations, allocate chaplaincy resources, maintain historical continuity, analyze demographic trends, and ensure that constitutional obligations are implemented consistently across large and complex institutions. They are instruments of governance rather than endorsements of belief.

Throughout American history, these administrative mechanisms have expanded and adapted in response to changing social conditions. As previously underrepresented religious communities became more visible within military service, correctional institutions, educational settings, and other public environments, administrative systems evolved to recognize those realities. This process has generally reflected practical administrative necessity rather than ideological preference.

The Importance of Administrative Specificity

Administrative recognition serves operational purposes only when it provides information that is sufficiently specific to support effective governmental decision-making. Classification systems that are overly broad may reduce administrative complexity, but they may also diminish the ability of

agencies to understand the populations they serve, identify accommodation needs, allocate resources, preserve demographic information, and communicate effectively with religious communities.

Historically, federal administrative systems have frequently expanded religious classifications rather than collapsing them as governmental experience with religious diversity increased. This reflects an important principle of public administration: effective administration often depends upon information of sufficient specificity to support operational decision-making.

The issue is therefore not whether government should evaluate theology. It should not. Rather, the question is whether administrative systems provide an appropriate level of detail to enable government to administer constitutional responsibilities effectively.

Administrative Recognition as Public Infrastructure

Administrative systems constitute an often-overlooked component of the nation's public infrastructure. Just as financial systems enable taxation, personnel systems support public employment, and records management systems preserve institutional continuity, religious administrative systems provide the organizational framework through which constitutional protections are implemented in practice.

Their importance is frequently most visible when they are absent or unclear. Ambiguous procedures, inconsistent terminology, undocumented administrative changes, or inadequate communication may create confusion for public officials and citizens alike. Conversely, transparent administrative processes strengthen institutional effectiveness by providing predictable procedures, preserving organizational knowledge, and supporting informed decision-making.

Viewed from this perspective, administrative recognition is not an end in itself. Rather, it is one component of a broader administrative ecosystem designed to facilitate effective governance while respecting constitutional principles. Its value lies in enabling public institutions to administer religious liberty consistently, transparently, and fairly across diverse operational environments.

For these reasons, discussions concerning religious liberty should include not only constitutional doctrine and judicial interpretation, but also the administrative systems through which those principles are implemented. Public administration represents the practical dimension of constitutional governance. Understanding that relationship provides the foundation for the recommendations that follow.

PART II

Administrative Principles Supporting Religious Liberty

III. Religious Liberty in Practice

Constitutional rights derive their enduring strength not only from judicial interpretation but from their consistent implementation through effective public administration. Every day, public officials make thousands of administrative decisions concerning religious accommodation, institutional access, chaplaincy services, dietary requirements, scheduling, facility use, recordkeeping, and numerous other matters affecting the practical exercise of religious liberty. Although individually routine, these decisions collectively determine how constitutional protections are experienced by the public.

For this reason, the administration of religious liberty should be understood as a continuing governmental responsibility rather than an occasional legal obligation. Administrative systems provide the mechanisms through which constitutional principles become operational. They establish procedures, preserve institutional knowledge, coordinate communication, and enable public servants to respond consistently to diverse religious needs while maintaining governmental neutrality.

This perspective does not diminish the importance of constitutional law. Rather, it recognizes that constitutional guarantees require effective administrative implementation in order to achieve their intended purpose. Courts resolve disputes when conflicts arise. Administrators, however, create the systems that often prevent unnecessary conflicts from occurring in the first place.

Accordingly, effective administration should be viewed as an essential component of religious liberty itself. Administrative excellence reinforces constitutional protections by promoting fairness, consistency, predictability, and public confidence in governmental decision-making.

Transparency as an Administrative Principle

Transparency serves as one of the foundational principles of effective public administration. Citizens are more likely to trust governmental institutions when administrative processes are understandable, significant policy changes are communicated clearly, and the rationale underlying important administrative decisions is reasonably documented.

Transparency also benefits government itself. Clearly documented procedures improve institutional continuity, reduce uncertainty among employees responsible for implementation, facilitate organizational learning, and provide valuable historical context for future decision-makers. Well-documented administrative practices reduce unnecessary confusion while promoting consistency across agencies and operational environments.

Transparency does not require disclosure of every internal deliberation or operational detail. Rather, it encourages the development of administrative systems that are sufficiently understandable to promote accountability and public confidence while preserving the operational flexibility necessary for effective governance.

In matters affecting religious liberty, transparency strengthens public trust by demonstrating that administrative decisions are grounded in identifiable principles and established procedures rather than arbitrary or inconsistent practice.

Administrative Recognition, Specificity, and Effective Governance

Administrative recognition serves an operational purpose only when it provides information of sufficient specificity to support effective governmental decision-making. Classification systems exist not to evaluate the legitimacy of religious beliefs, but to enable government to administer its constitutional and statutory responsibilities accurately, consistently, and efficiently.

Every administrative classification represents a balance between simplicity and usefulness. Categories that are overly broad may reduce administrative complexity, but they may also diminish the quality of information available to decision-makers. Conversely, appropriately detailed classifications enable government to better understand the populations it serves while improving the effectiveness of planning, communication, and service delivery. When administrative specificity is unnecessarily reduced, agencies risk losing information that supports accommodation planning, historical continuity, demographic analysis, and effective communication with the communities they serve. The question is therefore not whether administrative systems should be simple, but whether they remain sufficiently informative to fulfill their operational purpose.

Administrative Experience Within the Department of Defense

The operational value of administrative specificity has previously been recognized by the Department of Defense itself. In a March 27, 2017 memorandum entitled *Faith and Belief Codes for Reporting Personnel Data of Service Members*, the Office of the Assistant Secretary of Defense explained that the Armed Forces Chaplains Board recommended expanding the Department's faith and belief codes to better align with statutory protections for the rights of conscience of service members and chaplains. The memorandum further explained that expanding the Department's administrative classifications would improve the accuracy of demographic reporting, enhance planning for religious support to the force, and provide a better assessment of the capabilities and requirements of each Military Service's Chaplain Corps.

The significance of this memorandum extends beyond the military context. It demonstrates that administrative specificity is not merely symbolic or theological. Rather, the Department itself recognized that more detailed religious identifiers improve operational planning, demographic accuracy, communication, and the administration of religious support. In that context, administrative specificity serves religious liberty by helping government understand and respond effectively to the needs of the populations it serves.

This experience also illustrates the importance of institutional continuity. When administrative systems evolve, agencies benefit from preserving the rationale for additions, consolidations, renamings, or retirements of administrative classifications. Such documentation supports transparency, preserves institutional knowledge, and enables future administrators to understand not only what changed, but why those changes were made.

These objectives illustrate a broader principle of sound public administration. Administrative specificity supports effective governance by enabling agencies to understand who they serve and to allocate resources accordingly. More detailed administrative information improves communication between government and affected communities, assists officials responsible for religious accommodations, supports chaplaincy planning, preserves demographic information for future analysis, and contributes to institutional learning over time.

Administrative specificity also strengthens institutional continuity. Historical records documenting how classification systems evolve—including additions, consolidations, renamings, or retirements of administrative identifiers—provide future administrators with valuable context for understanding prior decisions and implementing subsequent policy changes. Maintaining that institutional knowledge reduces uncertainty, promotes consistency, and supports informed decision-making across successive administrations.

Importantly, administrative specificity should not be confused with governmental endorsement of religion. The Constitution neither authorizes nor requires government to determine theological validity. Rather, appropriately detailed administrative classifications enable constitutionally neutral institutions to carry out operational responsibilities fairly and effectively while respecting the diverse religious identities of the populations they serve.

Accordingly, the question is not whether government should recognize every religious tradition as a matter of theological legitimacy. The appropriate question is whether administrative systems contain sufficient information to enable government to fulfill its constitutional obligations effectively, transparently, and consistently. When viewed through this administrative lens, specificity becomes not a matter of preference, but of effective governance.

Institutional Continuity and Organizational Learning

Effective public administration depends upon institutional memory. Government agencies routinely preserve policies, procedures, guidance documents, historical records, and operational experience because continuity enables future decision-makers to benefit from prior knowledge rather than repeatedly rediscovering solutions to recurring challenges.

This principle applies equally to the administration of religious liberty. Historical documentation, administrative guidance, policy rationales, and implementation experience provide valuable institutional knowledge that supports consistency while reducing unnecessary uncertainty. When agencies preserve this knowledge, they strengthen both operational effectiveness and public confidence.

Organizational learning also encourages continual improvement. Administrative systems should evolve as governmental experience expands, demographic conditions change, and operational needs develop. Periodic review of administrative practices allows agencies to identify opportunities for improvement while preserving successful approaches developed through experience.

This perspective recognizes that effective administration is neither static nor self-executing. It requires continual evaluation, thoughtful refinement, and a willingness to incorporate lessons learned over time.

Constructive Engagement

Public administration benefits from informed dialogue among governmental institutions, religious communities, scholars, practitioners, and the citizens affected by administrative decisions.

Constructive engagement promotes mutual understanding while providing decision-makers with practical perspectives that may not be apparent through internal administrative processes alone.

Such engagement should not be understood as transferring governmental authority to outside organizations. Responsibility for administrative decisions properly remains with public officials acting within constitutional and statutory authority. Consultation, however, often improves the quality of administrative decision-making by broadening understanding of operational impacts and identifying practical considerations that may otherwise be overlooked.

Constructive engagement also reinforces public confidence. Citizens are more likely to perceive governmental processes as fair when agencies demonstrate openness to informed dialogue while maintaining transparency concerning their ultimate decision-making responsibilities.

For these reasons, opportunities for appropriate communication between government and affected communities should be viewed as a strength of effective public administration rather than a departure from constitutional neutrality.

The principles discussed above—effective implementation, transparency, operational recognition, institutional continuity, and constructive engagement—represent enduring characteristics of sound public administration. They do not prescribe specific policy outcomes, nor do they favor particular religious traditions. Instead, they describe administrative practices that strengthen governmental effectiveness while reinforcing public confidence in the practical implementation of religious liberty.

Building upon these principles, the following recommendations are respectfully offered for the Commission's consideration.

PART III

Recommendations to the Religious Liberty Commission

The Pagan Solidarity Alliance respectfully offers the following recommendations as principles of sound public administration. They are intended neither to prescribe specific administrative outcomes nor to advocate preferential treatment for any religious tradition. Rather, they identify practices that strengthen transparency, consistency, institutional effectiveness, and public confidence in the practical implementation of religious liberty.

Collectively, these recommendations reflect the central thesis of this brief: constitutional protections achieve their greatest practical value when supported by well-designed administrative systems.

Administrative Change as a Case Study

The Alliance's interest in administrative implementation arises from recent publicly reported changes to military religious preference classifications. Regardless of the ultimate merits of those decisions, the circumstances illustrate broader principles discussed throughout this brief.

Questions concerning documentation, historical continuity, stakeholder communication, implementation guidance, and administrative transparency are not unique to any particular religious tradition. They arise whenever significant administrative systems evolve.

The recommendations offered in this paper therefore should not be understood as responses to a single event. Rather, they reflect broader principles that may assist governmental institutions whenever substantial administrative changes affect the implementation of religious liberty.

Recommendation 1

Promote Administrative Transparency

The Commission should encourage federal agencies to document and communicate significant administrative decisions affecting religious recognition, accommodation procedures, and related operational policies whenever practicable.

Transparency strengthens both accountability and public confidence. Clear documentation of administrative changes enables employees, affected communities, and future administrators to understand how decisions were reached while preserving institutional knowledge for future reference. Although agencies must retain appropriate operational flexibility, significant changes affecting the implementation of religious liberty should ordinarily be accompanied by sufficient explanation to promote informed public understanding.

Recommendation 2

Preserve Institutional Knowledge

Federal agencies should maintain appropriate historical records supporting significant administrative decisions relating to religious administration.

Institutional memory is an essential component of effective governance. Administrative guidance, historical policy rationales, implementation experience, and related documentation enable future decision-makers to build upon prior knowledge rather than repeatedly revisiting previously resolved issues. Preserving institutional continuity improves consistency while reducing unnecessary uncertainty for both public officials and the communities they serve.

Recommendation 3

Maintain Administrative Recognition Systems at an Appropriate Level of Specificity

Administrative classification and recognition systems should be maintained at a level of specificity sufficient to support effective governmental operations. Periodic review should evaluate not only administrative efficiency, but also whether classification systems continue to provide the information necessary to support religious accommodation, demographic reporting, chaplaincy planning, institutional continuity, and effective communication with affected communities.

Such reviews need not imply that every requested change should be adopted. Rather, periodic evaluation demonstrates sound administrative practice by ensuring that existing systems continue to fulfill their intended operational purposes. Regular review encourages continual improvement while preserving flexibility to respond to changing governmental needs.

Administrative implementation should neither advantage nor disadvantage religious communities based upon their size, public familiarity, historical prominence, or perceived popularity. Equal protection requires that administrative systems remain capable of recognizing and serving both majority and minority faith communities—including those encompassing diverse religious traditions and denominations—according to transparent, consistent, and objective principles.

Recommendation 4

Encourage Constructive Engagement

Where appropriate, agencies should maintain opportunities for constructive dialogue with affected communities, subject-matter experts, chaplains, scholars, and other stakeholders whose experience may contribute to informed administrative decision-making.

Constructive engagement enhances administrative understanding without transferring governmental authority or compromising constitutional neutrality. Open communication frequently improves policy implementation by identifying practical concerns, clarifying operational

impacts, and strengthening mutual understanding between governmental institutions and the public.

Recommendation 5

Promote Administrative Consistency

Administrative guidance concerning the implementation of religious liberty should emphasize consistency while recognizing that operational environments may require reasonable flexibility in application.

Consistency promotes fairness, predictability, and public confidence. Clear administrative guidance assists personnel responsible for implementation while reducing unnecessary variation among similarly situated cases. At the same time, agencies should retain sufficient flexibility to address legitimate operational differences among military, correctional, healthcare, educational, and other governmental settings.

Recommendation 6

Encourage Evidence-Based Administrative Evaluation

Administrative systems should be evaluated periodically using objective information concerning implementation, operational effectiveness, and lessons learned.

Government benefits from continual organizational learning. Periodic evaluation enables agencies to identify successful practices, recognize opportunities for improvement, and adapt administrative systems as operational experience accumulates. Evidence-based evaluation strengthens both efficiency and public confidence while encouraging thoughtful refinement rather than reactive change.

Recommendation 7

Recognize Administration as an Essential Component of Religious Liberty

The Commission should recognize that effective public administration constitutes an essential component of the practical implementation of religious liberty.

Constitutional guarantees establish legal rights. Administrative systems transform those rights into everyday reality. The continued strength of religious liberty therefore depends not only upon constitutional interpretation but also upon the effectiveness, transparency, consistency, and professionalism of the administrative institutions responsible for implementation.

Recognizing this relationship encourages a more comprehensive understanding of religious liberty—one that appreciates both constitutional principle and administrative practice as mutually reinforcing elements of effective democratic governance.

The recommendations presented above do not seek to redefine constitutional doctrine or alter the fundamental relationship between government and religion. Rather, they reflect established principles of effective public administration that can strengthen the practical implementation of existing constitutional protections.

The Alliance respectfully submits that attention to these administrative considerations will contribute to more consistent, transparent, and effective governance while reinforcing public confidence in the Nation's longstanding commitment to religious liberty for all.

PART IV

Toward the Practical Administration of Religious Liberty

Religious liberty occupies a unique place within the American constitutional tradition. It protects individual conscience, preserves institutional neutrality, and reflects one of the Nation's enduring commitments to human dignity and democratic governance. Throughout American history, courts have interpreted these constitutional protections, legislatures have enacted statutory safeguards, and public officials have worked to implement them across an increasingly diverse society.

This brief has examined an aspect of religious liberty that receives comparatively little public attention: the administrative systems through which constitutional principles are translated into everyday governmental practice. While constitutional doctrine establishes legal rights, administration determines how those rights are experienced by citizens interacting with public institutions.

The Alliance's ongoing documentary research, including pending Freedom of Information Act requests concerning historical administrative records, reflects the belief that transparency strengthens both governmental institutions and public confidence. Whatever conclusions future records may reveal, preserving institutional knowledge and making administrative history available for informed public understanding serves the interests of effective governance and constitutional accountability alike.

Administrative systems perform essential functions that are often invisible when operating effectively. They facilitate communication between government and religious communities, coordinate accommodations, preserve institutional knowledge, organize demographic information, support chaplaincy programs, and provide public officials with practical mechanisms for implementing constitutional obligations consistently. Although these systems are administrative rather than judicial, they represent an indispensable component of the practical exercise of religious liberty.

For this reason, the Alliance respectfully submits that discussions concerning religious liberty should encompass not only constitutional interpretation but also the quality of the administrative systems responsible for implementation. Transparency, consistency, institutional continuity, organizational learning, and constructive engagement are not merely management practices; they are characteristics of sound public administration that strengthen public confidence while supporting faithful execution of constitutional responsibilities.

The recommendations presented in this brief are offered in that spirit. They do not advocate preferential treatment for any religious tradition, nor do they seek to alter existing constitutional doctrine. Rather, they encourage continued attention to the administrative structures that enable government to serve an increasingly diverse public fairly, consistently, and effectively.

The Pagan Solidarity Alliance recognizes the complexity of administering religious liberty within a pluralistic constitutional republic. Public officials must balance competing responsibilities, operate within evolving legal frameworks, and make decisions affecting citizens representing an extraordinary diversity of religious beliefs and practices. Effective administration requires both principled leadership and practical flexibility.

As this brief has demonstrated, appropriately specific administrative recognition systems are not expressions of theological preference but practical instruments of effective public administration. They enable government to understand the populations it serves, support religious accommodation, preserve institutional knowledge, improve demographic reporting, inform chaplaincy planning, and fulfill constitutional responsibilities consistently while maintaining institutional neutrality. Properly understood, administrative specificity strengthens religious liberty not by favoring particular beliefs, but by improving the quality of public administration itself.

Ultimately, the enduring strength of religious liberty depends not only upon the rights guaranteed by the Constitution, but upon the daily work of the public servants entrusted with implementing those guarantees. Sound administration does not replace constitutional principle; it gives constitutional principle practical effect.

It is in that spirit of constructive public service, institutional respect, and commitment to effective governance that the Pagan Solidarity Alliance respectfully submits this policy brief for the Commission's consideration.

Constitutional rights endure through law. They become meaningful through faithful administration.

About the PSA Policy Brief Series

The **PSA Policy Brief Series** is published by the Pagan Solidarity Alliance to promote thoughtful discussion concerning religious liberty, public administration, minority-faith communities, and related public policy issues.

Each publication seeks to contribute constructively to public discourse through careful historical research, evidence-based analysis, and practical recommendations grounded in principles of effective governance. The series is intended to inform policymakers, public administrators, scholars, faith leaders, journalists, and members of the public while encouraging respectful dialogue across diverse perspectives.

The Alliance believes that durable public policy is strengthened through scholarship, transparency, institutional learning, and constructive engagement. Accordingly, each publication emphasizes constitutional principles, sound public administration, and practical implementation rather than partisan advocacy.

The views expressed within individual publications represent the considered analysis of their authors and have been reviewed for publication by the Pagan Solidarity Alliance.

About the Pagan Solidarity Alliance

The Pagan Solidarity Alliance is a national coalition dedicated to advancing religious liberty, mutual understanding, and equal treatment for Pagan communities while promoting constitutional principles that benefit individuals of every faith tradition.

The Alliance supports education, leadership development, research, constructive public engagement, and collaborative partnerships that strengthen both religious liberty and effective public administration.

Recognizing that the principles discussed in this publication extend beyond any single religious tradition, the Alliance seeks to contribute positively to public policy through thoughtful scholarship, practical recommendations, and respectful dialogue with governmental institutions, academic researchers, nonprofit organizations, and community leaders.

About the Author

M. Rev. Dr. Davron Michaels serves as Paramount Priest of New Aeon Church International and is a member of the Spiral Council of the Pagan Solidarity Alliance.

Professionally, he has more than three decades of experience in organizational leadership, public administration, nonprofit governance, and higher education. His career has included executive leadership in both public and nonprofit organizations, organizational consulting, and university instruction in business administration and management.

For more than three decades, Dr. Michaels has worked on issues involving the practical implementation of religious liberty for minority-faith communities. His experience includes advocacy concerning military religious accommodation, governmental recognition of minority faiths, and participation in national efforts surrounding the recognition of the pentacle as an approved emblem of belief for veterans' government-issued headstones and markers.

Drawing upon both professional administrative experience and longstanding involvement in minority-faith religious liberty issues, Dr. Michaels approaches these questions from the perspective of effective governance rather than theological advocacy. His work emphasizes constructive engagement among governmental institutions, faith communities, and the public to strengthen the practical implementation of constitutional protections.

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Appendices

The following appendices provide supplemental historical, legal, and methodological information supporting the discussion contained in this policy brief. They are intended to assist readers seeking additional context while preserving the readability of the principal text.

APPENDIX A

Timeline of Administrative Developments

The following timeline provides historical context for the administrative developments discussed in this policy brief.

Date	Administrative Development	Significance
October 6, 2017	U.S. Department of Justice issues <i>Federal Law Protections for Religious Liberty</i> memorandum.	Establishes government-wide guidance emphasizing the protection of religious liberty throughout executive branch administration.
March 27, 2017	Department of Defense issues <i>Faith and Belief Codes for Reporting Personnel Data of Service Members</i> .	Expands military Faith and Belief Codes to improve demographic reporting, chaplain planning, and religious support capabilities.
May 20, 2026	Department of Defense revises Faith and Belief Codes, reducing the number of recognized classifications.	Represents a significant restructuring of administrative religious classification systems.
June 2026	Public reporting brings the administrative revisions to national attention.	Initiates public discussion concerning transparency, administrative continuity, and implementation.
June–July 2026	Pagan Solidarity Alliance initiates a coordinated five-request Freedom of Information Act (FOIA) research initiative.	Begins systematic documentary research into the historical development and implementation of federal religious classification systems.
July 2026	Submission of this policy brief.	Presents recommendations concerning the administrative implementation of religious liberty.

APPENDIX B

Evolution of Federal Religious Administrative Recognition

The administrative recognition of religious identities within the federal government has evolved gradually in response to changing operational requirements rather than theological considerations. As governmental institutions have become responsible for serving an increasingly diverse population, administrative systems have expanded to improve communication, accommodation, demographic reporting, and institutional planning while maintaining constitutional neutrality toward religion.

Early Administrative Practice

For much of the twentieth century, federal administrative systems recognized only a relatively small number of broad religious classifications. These systems reflected the demographic composition of the Nation at the time and the practical administrative needs of governmental institutions rather than any comprehensive catalog of religious traditions.

As American society became increasingly religiously diverse, public institutions—including the Armed Forces, correctional systems, health care facilities, and other governmental organizations—encountered growing numbers of individuals whose religious identities were not adequately represented within existing administrative classifications.

Expansion Through Administrative Experience

Rather than remaining static, federal administrative recognition systems generally evolved in response to operational experience. As agencies encountered new accommodation requests, expanded chaplaincy responsibilities, changing demographics, and increasing interaction with diverse faith communities, administrative classifications became progressively more detailed.

This evolution reflected a practical principle of public administration: effective governance depends upon information that is sufficiently specific to support informed decision-making. More detailed administrative recognition improved demographic reporting, facilitated communication with religious communities, supported chaplaincy planning, preserved institutional knowledge, and assisted public officials responsible for implementing constitutional protections.

The 2017 Department of Defense Memorandum

A significant example of this principle appears in the Department of Defense memorandum, *Faith and Belief Codes for Reporting Personnel Data of Service Members* (March 27, 2017). Acting upon recommendations of the Armed Forces Chaplains Board, the Department expanded its Faith and Belief Codes to better align administrative practice with statutory protections for the rights of conscience of service members and chaplains.

The memorandum explained that additional administrative specificity would improve demographic reporting, enhance planning for religious support to the force, and provide a better assessment of each Military Service's chaplain capabilities and requirements. In doing so, it explicitly recognized that administrative classification systems serve practical operational functions rather than theological ones.

Recent Administrative Developments

In 2026, the Department of Defense substantially revised its Faith and Belief Codes, reducing the number of administrative classifications. Regardless of the ultimate merits of that decision, the revision illustrates the continuing importance of transparency, documentation, institutional continuity, and effective communication whenever significant administrative systems evolve.

Because administrative recognition systems influence governmental planning, demographic information, accommodation procedures, and institutional knowledge, changes to those systems benefit from clear documentation explaining both the operational rationale for revision and the manner in which affected administrative functions will continue to be performed.

Administrative Continuity

The evolution of federal religious administrative recognition demonstrates that classification systems are not static artifacts but living components of public administration. Like other governmental information systems, they should be evaluated periodically to ensure that they continue to provide sufficient information to support effective governance while preserving historical continuity and maintaining public confidence.

Viewed from this perspective, administrative recognition is best understood as an operational instrument of constitutional governance—one designed to assist government in implementing religious liberty fairly, consistently, and effectively for an increasingly diverse society.

APPENDIX C

Research Methodology and Documentary Research Initiative

This publication was developed through a review of constitutional authorities, federal statutes, judicial decisions, executive branch guidance, Department of Defense publications, public administration scholarship, historical administrative materials, and contemporary reporting concerning federal religious classification systems.

To supplement publicly available materials, the Pagan Solidarity Alliance initiated a coordinated five-request Freedom of Information Act (FOIA) research initiative designed to obtain historical and current administrative records concerning the evolution, implementation, and administration of Department of Defense Faith and Belief Codes.

Request 1

Religious Preference / Affiliation Code Lists and Crosswalk

Purpose:

Obtain current and historical classification lists, implementation guidance, and documentation concerning additions, deletions, consolidations, renamings, and crosswalks between classification systems.

Request 2

Administrative Decision Record

Purpose:

Obtain memoranda, briefing materials, approvals, recommendations, and supporting documentation relating to both the 2017 expansion and the 2026 restructuring of Faith and Belief Codes.

Request 3

Differential Impact and Administrative Analysis

Purpose:

Determine whether potential impacts upon affected communities were evaluated and identify historical administrative criteria supporting classification decisions.

Request 4**Legal and Policy Review**

Purpose:

Obtain legal analyses concerning constitutional requirements, statutory authorities, Department of Defense policy, and related administrative guidance supporting implementation.

Request 5**Stakeholder Consultation**

Purpose:

Determine what consultation occurred with chaplain leadership, religious organizations, governmental entities, and other stakeholders during development and implementation.

At the time of publication, these requests remain pending. They are referenced as documentation of the Alliance's research methodology rather than as evidentiary support for the conclusions presented in this publication.

APPENDIX D

Selected Legal Authorities

The following authorities provide the principal constitutional, statutory, and judicial framework supporting the discussion contained in this publication.

Authority	Administrative Relevance
First Amendment to the United States Constitution	Constitutional foundation for religious liberty and governmental neutrality.
Religious Freedom Restoration Act (RFRA)	Establishes federal statutory protections against substantial burdens on religious exercise.
Religious Land Use and Institutionalized Persons Act (RLUIPA)	Strengthens protection of religious exercise within institutional settings.
<i>Dettmer v. Landon</i> (1986)	Recognizes Wicca as a religion entitled to constitutional protection within correctional administration.
<i>Church of the Lukumi Babalu Aye v. City of Hialeah</i> (1993)	Reinforces governmental neutrality toward religion.
<i>Cutter v. Wilkinson</i> (2005)	Confirms accommodation of minority-faith religious exercise within institutional environments under RLUIPA.
<i>Holt v. Hobbs</i> (2015)	Demonstrates practical implementation of religious accommodation through institutional administration.