



February 2021

COUNTERING VIOLENT EXTREMISM

DHS Needs to Improve Grants Management and Data Collection



A Century of Non-Partisan Fact-Based Work

GAO@100 Highlights

Highlights of [GAO-21-216](#), a report to congressional requesters

Why GAO Did This Study

From 2010 through 2019, data collected through the Extremist Crime Database show that 205 deaths resulted from 59 violent extremist attacks in the United States. DHS received funding in 2016 to establish a new CVE Grant Program to support efforts by state and local governments and nongovernmental organizations to reduce risk factors associated with violent extremism. GAO was asked to review management of the CVE Grant Program.

This report examines, among other things, the extent to which DHS (1) announced, reviewed, and awarded CVE grants in accordance with OMB guidance and (2) evaluated the performance of CVE grantees and the overall program. GAO reviewed documentation of DHS's actions in announcing, reviewing and awarding CVE grants; and documentation on steps taken to assess the performance of grantees and the overall program; as compared to requirements in key documents, including the CVE grant announcement, elements of internal control, and a DHS 2017 report to Congress.

What GAO Recommends

GAO recommends that DHS, for future CVE-related grant programs: (1) develop policy to document the rationale for award decisions, and (2) take steps to ensure that grantees collect and submit data on project performance that enable evaluation of individual grants and the overall grant program toward intended outcomes. DHS concurred with both recommendations.

View [GAO-21-216](#). For more information, contact Triana McNeil at (202) 512-8777 or mcnelt@gao.gov.

February 2021

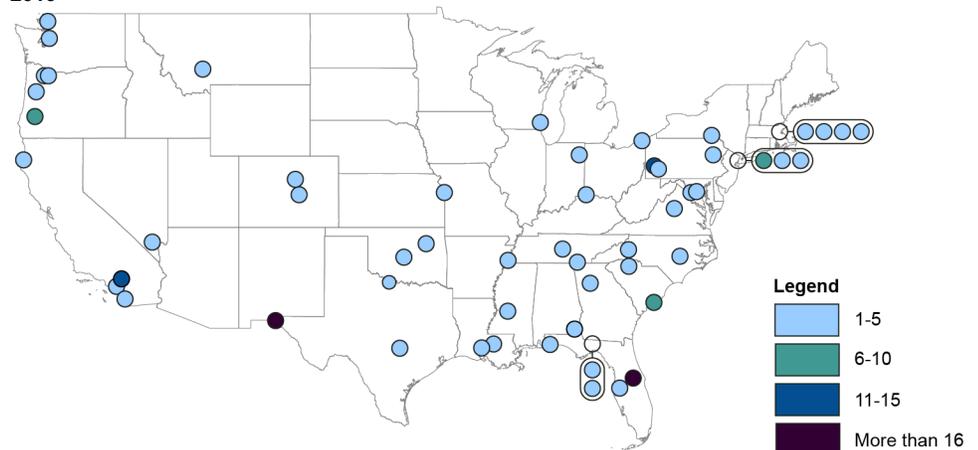
COUNTERING VIOLENT EXTREMISM

DHS Needs to Improve Grants Management and Data Collection

What GAO Found

While the Department of Homeland Security (DHS) followed the Office of Management and Budget (OMB) guidance for announcing the 2016 Countering Violent Extremism (CVE) Grant Program and reviewing applications, DHS did not document the basis for its final award decisions. In June 2017, DHS awarded a total of \$10 million in CVE grants to 26 grantees for a 2-year performance period (2017 to 2019). Consistent with OMB guidance, DHS included program priorities and eligibility requirements in its grant announcement and described the process for reviewing and selecting grant applications for award. However, after DHS announced its selection of 31 applications for awards, it ran a new process resulting in revised selections, which was based on additional selection criteria not expressly listed in the grant announcement. While DHS officials explained to GAO how these additional criteria aligned with the grant announcement, these explanations do not appear in DHS's award documentation. Without such documentation, DHS cannot clearly demonstrate that its award decisions were based on the process described in the grant announcement.

Figure: Location and Number of Deaths Associated with Domestic Extremist Attacks, 2010-2019



Source: GAO analysis of Extremist Crime Database information. | GAO-21-216

DHS did not obtain the necessary data from grantees to evaluate the overall CVE grant program. DHS required grant organizations to develop, collect, and submit their own output and outcome-related information to help enable the department to evaluate individual grantees and the overall grant program. However, a DHS review of four grant projects concluded that the grantees did not collect the type of performance information DHS needed to determine the grants' effectiveness, such as data at various time intervals to assess change in attitudinal behavior. Taking steps to ensure grantees collect and submit appropriate performance data would enable DHS to evaluate the extent that individual grant projects and the overall grant program are achieving results. Such information would help DHS manage the program and make adjustments as warranted.

Contents

Letter		1
	Background	5
	DHS Followed Guidance to Announce and Develop a Review Process for Countering Violent Extremism Grants, but Did Not Fully Document Final Award Decisions	10
	DHS Lacks Data to Assess the Overall Effectiveness of the Countering Violent Extremism Grant Program	14
	Grantees Were Generally Satisfied with Technical Assistance Provided by DHS	16
	Conclusions	18
	Recommendations for Executive Action	19
	Agency Comments and Our Evaluation	19
Appendix I	Objectives, Scope, and Methodology	21
Appendix II	Selected Grant Information for DHS's Countering Violent Extremism Grant Program	25
Appendix III	Selected Responses from DHS's Countering Violent Extremism Grant Program Grantees	29
Appendix IV	Comments from the Department of Homeland Security	41
Appendix V	GAO Contact and Staff Acknowledgements	44
Table		
	Table 1: Countering Violent Extremism Grant Program Applicants Announced for Award and Applicants that Received Award by Focus Area	27

Figures

Figure 1: Deaths and Attacks Associated with Domestic Extremist Attacks, 2010-2019	6
Figure 2: Location and Number of Deaths Associated with Domestic Extremist Attacks, 2010-2019	7
Figure 3: DHS's Office for Targeted Violence and Terrorism Prevention Sections' Responsibilities	8
Figure 4: Countering Violent Extremism Grant Program Focus Areas	9
Figure 5: Comparison of Grantee Scores by Focus Area for the CVE Grant Program	11
Figure 6: Targets for Awarding Grants Published in DHS's Countering Violent Extremism Notice of Funding Opportunity and Actual Amounts Awarded by Focus Area	25
Figure 7: Location and Award Focus Area for the 26 Countering Violent Extremism Program Grantees	26

Abbreviations

CVE	Countering Violent Extremism
DHS	Department of Homeland Security
ECDB	Extremist Crime Database
OMB	Office of Management and Budget
OTVTP	Office for Targeted Violence and Terrorism Prevention
PIEP	Project Implementation and Evaluation Plan
PPR	Performance Progress Report
Uniform Guidance	Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.

February 1, 2021

Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Bennie G. Thompson
Chairman
Committee on Homeland Security
House of Representatives

Violent extremism—generally defined as planning or committing violent acts to achieve political, ideological, religious, or social goals—has been perpetrated and promoted by a broad range of individuals and groups, including white supremacists, antigovernment groups, environmental extremists, and radical Islamist entities, among others. From 2010 to 2019, data from the Extremist Crime Database show that there were 205 deaths resulting from 59 violent extremist attacks in the United States.¹ According to the Extremist Crime Database, the lethality of these attacks peaked in 2016 at 17 deaths per attack, and 2019 was the second most lethal year with almost 9 deaths per attack. Further, the 2020 demonstrations and civil unrest in cities across the country have presented extremists with additional opportunities to sow discord and commit violence.

The Department of Homeland Security's (DHS) fiscal year 2016 appropriation included \$50 million to address emergent threats from violent extremism and from complex, coordinated terrorist attacks, of which DHS designated \$10 million for a new grant program aimed at

¹The Extremist Crime Database was established in 2005 by the DHS Emeritus Center of Excellence for the Study of Terrorism and Responses to Terrorism. The focus of this database is to identify extremist-related crime, including but not limited to crimes resulting in deaths, and also the extent to which extremism played a role in the crime. As of fall 2019, the database is independently managed by the Extremist Crime Database Research Team and not affiliated with DHS, although the principal researchers and methodology have generally remained the same.

countering violent extremism (CVE).² Unlike traditional counterterrorism activities, which typically involve law enforcement investigations, CVE focuses on reducing individual and societal risk factors associated with violent extremism aimed at prevention, and intervening with individuals on the path to violence.

DHS has not received another appropriation specifically for countering violent extremism since fiscal year 2016. However, DHS's fiscal year 2020 appropriation provided \$10 million for targeted violence and terrorism prevention grants, described by DHS as the successor to the CVE program.³ DHS considers all previous CVE activities to now fall within the larger category of targeted violence and terrorism prevention. In addition, while DHS has not established a formal definition of targeted violence, agency officials told us it is similar in nature to terrorism in that it may be intended to cause widespread terror but is not necessarily tied to an ideology.

You asked us to review DHS's CVE Grant Program. This report examines:

1. the extent to which DHS announced, reviewed, and awarded CVE grants in accordance with Office of Management and Budget (OMB) guidance;
2. the extent to which DHS evaluated the performance of CVE grantees and the overall CVE Grant Program; and
3. grantees' views on technical assistance DHS provided and other grant management practices.

To determine the extent to which DHS adhered to OMB guidance to announce a grant opportunity, review applications, and award CVE grants, we reviewed OMB's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), which provides government-wide policies and procedures for the award and administration of federal grants; and DHS's Countering

²See Pub. L. No. 114-113, div. F, tit. V, § 543, 129 Stat. 2242, 2518-19 (2015). Of the remaining \$40 million, DHS designated \$1 million for a Joint Counterterrorism Workshop and \$39 million to the Complex Coordinated Terrorist Attacks Grant Program. The distribution of amounts across these programs, including the \$10 million for the CVE Grant Program, was in accordance with the explanatory statement accompanying DHS's appropriation. 161 Cong. Rec. H10162 (2015).

³See Pub. L. No. 116-93, div. D, tit. I, 133 Stat. 2317, 2502 (2019).

Violent Extremism Grant Program Notice of Funding Opportunity (grant announcement).⁴ We also reviewed federal internal control standards related to implementing control activities through policies.⁵ We spoke with DHS officials and assessed DHS grants management procedures and documents on grantee selection to determine the extent that the rationale for award decisions was documented and aligned with information in the grant announcement.

To determine the extent to which DHS evaluated the performance of CVE grant projects and the overall CVE grant program, we identified the evaluation steps outlined in the CVE grant announcement, DHS's fiscal year 2017 Report to Congress on the CVE Grant Program, and the GPRA Modernization Act of 2010.⁶ We also reviewed and analyzed quarterly grantee progress and performance reports for selected quarters in the 2-year performance period that began in 2017 for information related to goals, outcomes, and measures; DHS's quarterly summaries of grantee progress reports during that same period and its March 2020 preliminary assessment of the CVE Grant Program; and the DHS Science and Technology Directorate's four assessments of individual CVE grant projects on their terrorism prevention efforts.

To obtain views from grantees about DHS's technical assistance and other grant management practices, we surveyed the grantees. Twenty-two of the 26 grantees responded. Of the four grantees who chose not to respond, one dropped from the grant program after the 4th quarter of the 2-year performance period and another dropped after the 7th quarter. Based on the responses of 22 of 26 grantees, the results provide the views of most grantees in the program but are not generalizable to the four grantees who did not participate.

⁴See 2 C.F.R. pt. 200.

⁵GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

⁶See Pub. L. No. 111-352, § 3, 124 Stat. 3866, 3867-3871 (2011) (codified at 31 U.S.C. § 1115). The performance management requirements enacted by the GPRA Modernization Act of 2010 are directed at executive departments. See 31 U.S.C. § 1115(h)(1) (incorporating the definition of an "agency" as "an Executive department" from 5 U.S.C. §§ 105, 306(f)). Our Office has reported that these requirements can also serve as leading practices at other organizational levels, including the program, project, or activity level. See GAO, *Drug Control: Actions Needed to Ensure Usefulness of Data on Suspicious Opioid Orders*, [GAO-20-118](#) (Washington, D.C.: Jan. 29, 2020).

To provide contextual information on the number of domestic attacks and deaths associated with violent extremism or targeted violence from 2010 through 2019, we obtained information from the Extremist Crime Database (the database), which is a joint project for collecting and reporting data on extremist-related violence.⁷ We assessed the reliability of the database through review of database documentation and an interview with the Extremist Crime Database principal investigators. We also reviewed publicly available articles to verify the data. We determined that this data source was sufficiently reliable for providing background information on violent extremism in the United States, including the number of attacks and deaths by ideological motivation, year, and location.

The data in the database cover a wide range of attacks with respect to the perceived tie to ideological motivation of the perpetrator, and database researchers rank ideological motivation from a low of 0 to a high of 4. For example, a ranking of 0 would be assigned to an attack by a perpetrator with no affiliation with ideology, such as anti-government, radical Islamist, or white supremacy sentiments. To determine the number of attacks and deaths, we only considered attacks where the strength of the ideological motivation had been ranked 2 through 4 and excluded attacks ranked as 0 or 1. See appendix I for additional details on our scope and methodology.

We conducted this performance audit from June 2019 to February 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

⁷The database originally was associated with the DHS Emeritus Center of Excellence National Consortium for the Study of Terrorism and Responses to Terrorism. It is now a privately funded project but uses the same methodology and is managed by the same principal researchers as it did when it was receiving funding from DHS. The Extremist Crime Database Research Team is comprised of Dr. Steven Chermak, Michigan State University; Dr. Joshua Freilich, John Jay College of Criminal Justice; Dr. Jeff Gruenewald, University of Arkansas; Dr. William Parkin, Seattle University; Dr. Colleen Mills, Penn State Abington; and Celinet Duran, State University of New York Oswego. For more information on the database, see Freilich, J., Chermak, S., Belli, R., Gruenewald, J., & W. Parkin. (2014). Introducing the Extremist Crime Database (ECDB). *Terrorism & Political Violence*, 26, 372-384; and Chermak, S., Freilich, J., Parkin, W., & J. Lynch. (2012). American Terrorism and Extremist Data Sources and Selectivity Bias: An Investigation Focusing on Homicide Events Committed by Far-Right Extremists. *Journal of Quantitative Criminology*, 28(1), 191-218.

the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Recent History of Violent Extremist Attacks

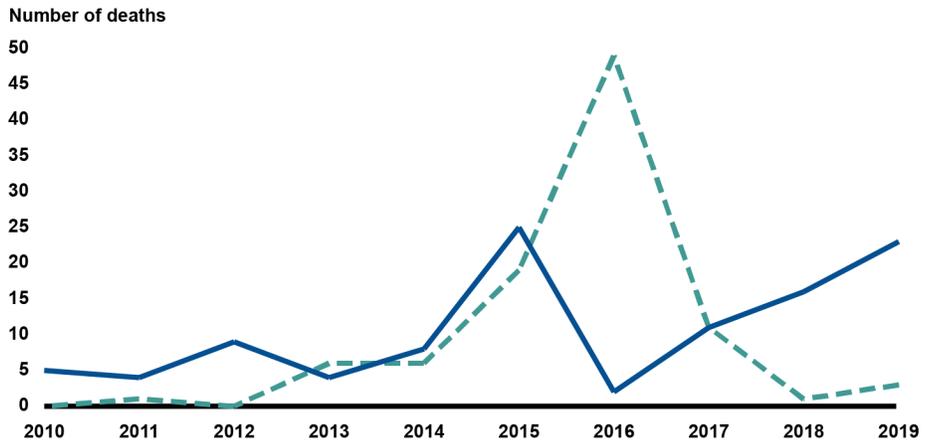
As we previously reported, violent extremist attacks resulting in deaths generally originate from two broad groups: far-right extremists and radical Islamist extremists.⁸ The single highest-casualty ideological attack since 2010 was the 2016 attack by an Islamic extremist at an Orlando nightclub that killed 49 people. However, our analysis of the data on violent extremist attacks indicates there has been a consistent rise in far-right extremist-related deaths since 2016.⁹ See figures 1 and 2 below.

⁸GAO, *Countering Violent Extremism: Actions Needed to Define Strategy and Assess Progress of Federal Efforts*, [GAO-17-300](#) (Washington, D.C.: Apr. 6, 2017). Far-right extremist groups exhibit white supremacy and anti-government ideological beliefs, and include Neo-Nazis, the Atomwaffen Division, and some members of the sovereign citizens' movement, among others. Radical Islamist Extremists exhibit militant ideological beliefs aimed at creating a worldwide community of Muslim believers by any means necessary, including violence. Radical Islamist extremist groups include al-Qa'ida and ISIS, among others. Far-left extremists include those with extreme views on animal rights and the environment. According to the Extremist Crime Database, there are no data as of 2019 on deaths resulting from far-left extremist groups, which include Earth Liberation Front, and Animal Liberation Front. Extremist Crime Database researchers do not report on annual amounts until a few months after the year ends. Thus, we are unable to confirm any extremist-related deaths during 2020.

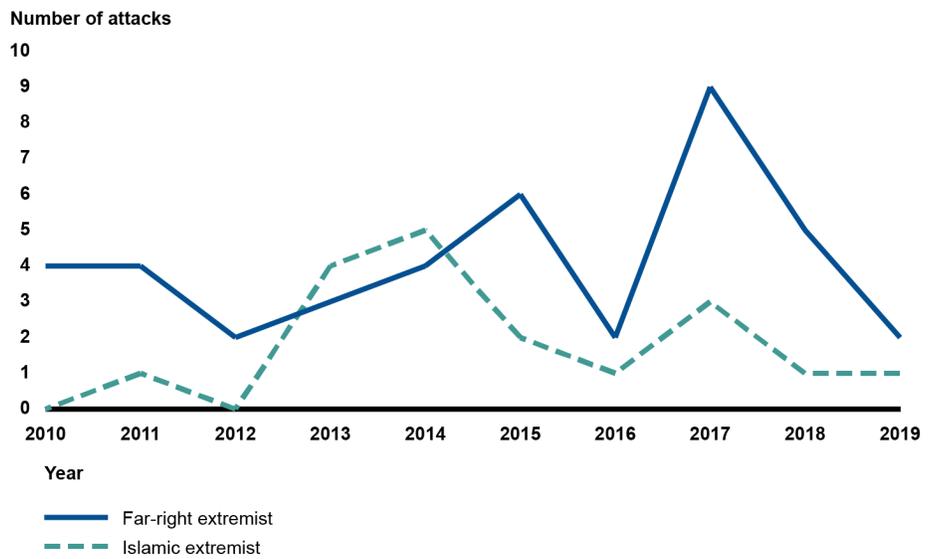
⁹DHS Office for Targeted Violence and Terrorism Prevention officials told us that they do not use or distinguish between far right from far left, but they categorize both as violent extremism. However, they said it is not incorrect or uncommon for experts to make these distinctions in the data.

Figure 1: Deaths and Attacks Associated with Domestic Extremist Attacks, 2010-2019

Number of deaths associated with far-right and Islamist extremist attacks in the U.S., 2010-2019



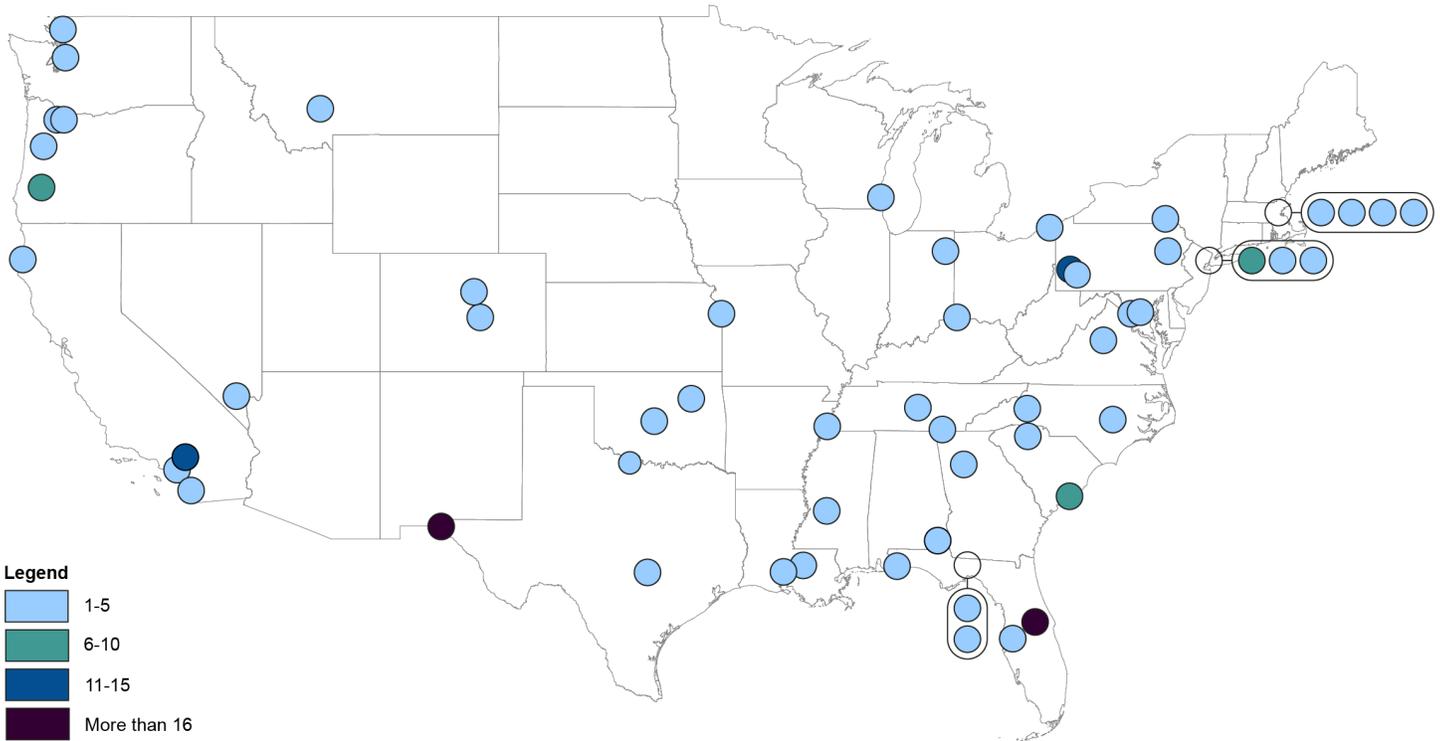
Number of attacks conducted by far-right and Islamist extremists in the U.S., 2010-2019



Source: GAO analysis of the Extremist Crime Database. | GAO-21-216

Note: The Department of Homeland Security avoids using terms such as far-right extremists, far-left extremists, or religious terms when discussing domestic extremism because such labels tend to be interpreted as judgments about members of the political spectrum or religious communities. However, we rely on data from previously published and current domestic terrorism information to make our observations in this figure. According to the Extremist Crime Database researchers, there were no data on attacks associated with far-left extremists during this time period. Database researchers stated that there is a current effort to collect a more robust set of data on leftwing violence.

Figure 2: Location and Number of Deaths Associated with Domestic Extremist Attacks, 2010-2019



Source: GAO analysis of Extremist Crime Database information. | GAO-21-216

Roles and Responsibilities

The Office for Targeted Violence and Terrorism Prevention is responsible for leading and coordinating DHS’s CVE programs and activities, including grant program management and providing community awareness briefings of potential threats and resources in specific communities.¹⁰ The Office for Targeted Violence and Terrorism Prevention consists of five sections as indicated below in figure 3.

¹⁰Since our 2017 report, DHS has reorganized the offices responsible for CVE activities twice, first in late 2017 from the Office of Community Partnerships to the Office for Terrorism Prevention and Partnerships, and most recently to the Office for Targeted Violence and Terrorism Prevention in April 2019. Unless otherwise indicated, for the purpose of this discussion, we refer to all activities conducted by Office of Community Partnerships, Office for Terrorism Prevention Partnerships, and the Office for Targeted Violence and Terrorism Prevention as Office for Targeted Violence and Terrorism Prevention-managed activities, as it is the office responsible for managing current CVE-related grant programs.

Figure 3: DHS's Office for Targeted Violence and Terrorism Prevention Sections' Responsibilities

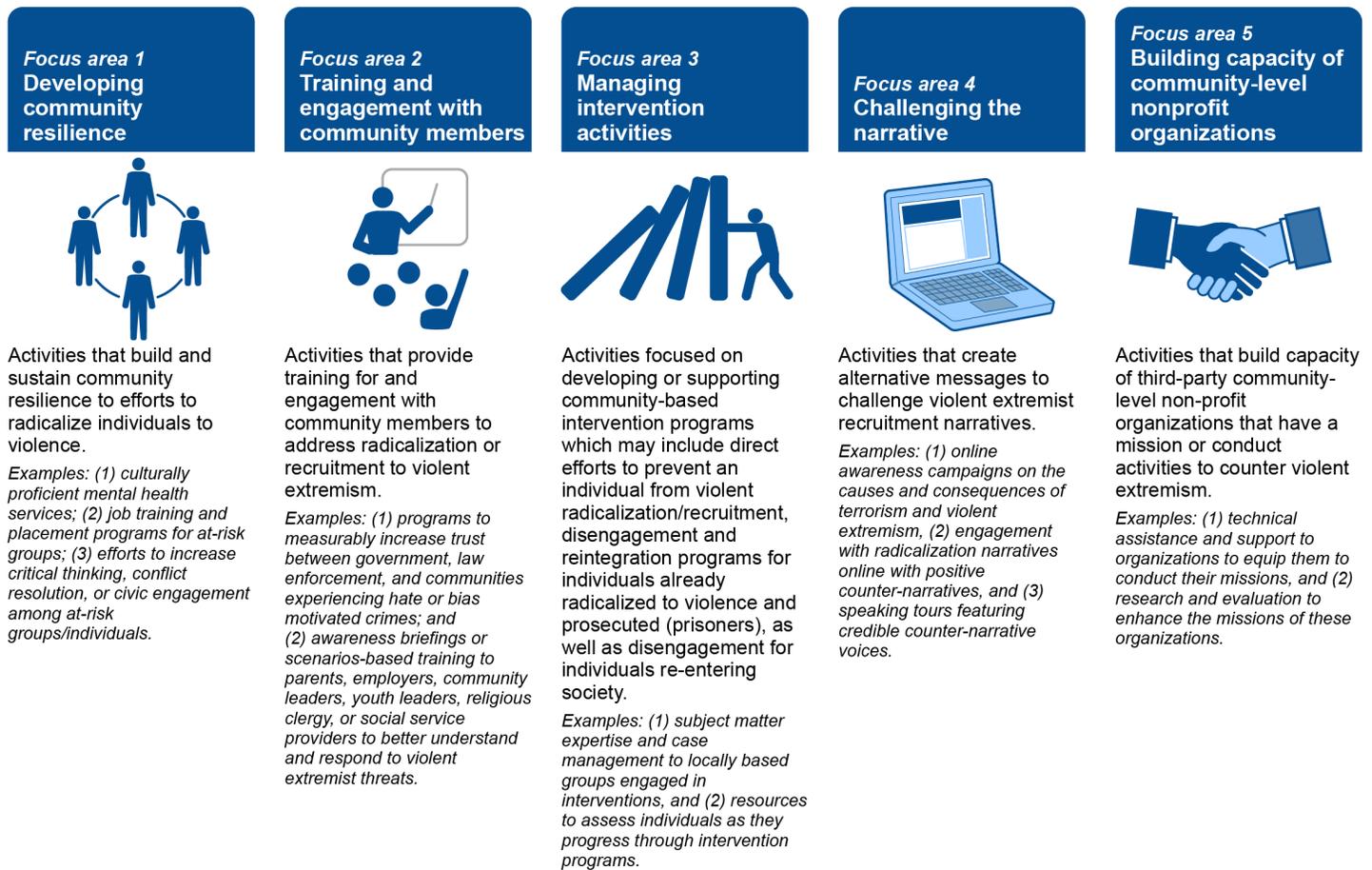
Policy and Research	Grants and Innovation	Prevention Education	Sector Engagement	Field Operations
Conducts baseline assessments of communities' violent extremist and targeted violence prevention capabilities and similarly assesses Office for Targeted Violence and Terrorism Prevention programs. Shares prevention-related research and policies among DHS offices and other governmental partners.	Administers the office's grant program. Also analyzes and reports on innovative approaches identified through the grant program.	Conducts prevention-related education to state and local prevention partners. Education includes training and awareness briefings, resilience exercise, and holding various forums for stakeholders.	Drives the Office for Targeted Violence and Terrorism Prevention's strategy for engaging various levels of government and public and private sectors. Sectors include, but are not limited to, technology, mental health, education, arts and entertainment, sports and athletics, and philanthropy.	Works with local and regional stakeholders in prioritized geographic areas to build capabilities, increase awareness of violent extremism, and empower local areas to establish sustainable local prevention frameworks to address extremism and targeted violence.

Source: GAO analysis of the DHS Office for Targeted Violence and Terrorism Prevention information. | GAO-21-216

The 2016 CVE Grant Program

The CVE Grant Program was a competitive grant program that focused on five areas to counter violent extremism: 1) developing community resilience; 2) training and engagement with community members; 3) managing intervention activities; 4) challenging the narrative; and 5) building the capacity of community-level nonprofit organizations. See figure 4 for a description of the focus areas.

Figure 4: Countering Violent Extremism Grant Program Focus Areas



Source: GAO analysis of Department of Homeland Security information. | GAO-21-216

The program was governed by a grant announcement written specifically for the program in accordance with the OMB’s Uniform Guidance, which sets government-wide guidance and requirements for grant-making agencies to follow in several areas, including conducting merit-review processes and creating auditing standards for grant recipients, among

other areas.¹¹ DHS treated this grant program similarly to a pilot program, with the intention of using the results of successful grants for stakeholders and future grant recipients to replicate in their own communities.

DHS Followed Guidance to Announce and Develop a Review Process for Countering Violent Extremism Grants, but Did Not Fully Document Final Award Decisions

DHS Generally Followed OMB Guidance

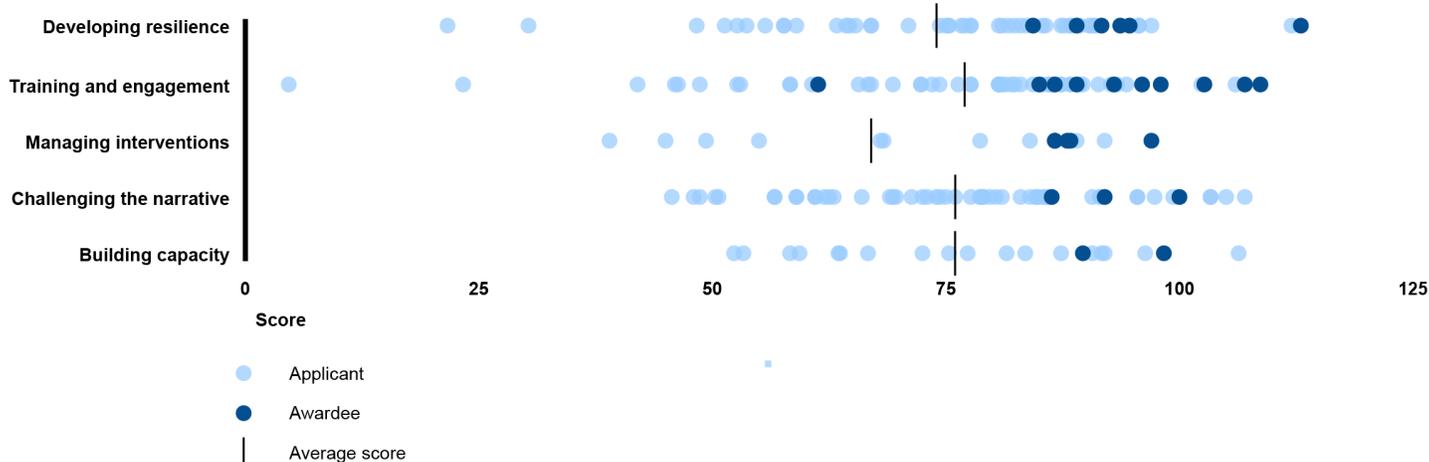
DHS followed OMB's Uniform Guidance by publicizing the CVE Grant Program through a grant announcement, which contained key elements specified in the guidance such as describing the priorities, eligibility requirements, and the application review and selection process for the program.¹² For example, the grant announcement stated that applications from state, local, and tribal governments; non-profit organizations; and institutes of higher education would be accepted and reviewed. In addition, the grant announcement described the merit review process for how the department would score applications, which could result in a maximum available score of 125. While the grant announcement permitted DHS to select lower-scored applications over higher-scored ones to achieve a diverse spectrum of awards, it informed applicants that DHS would consider the scoring results as part of the selection process.

¹¹A notice of funding opportunity, referred to in this report as the grant announcement, is a public notice announcing the agency is soliciting applications to receive grant funds and includes information on the program, eligibility, application submission requirements, and the review process, among other things. Grant announcement requirements appear in the Office of Management and Budget's Uniform Guidance, which are government-wide regulations that address several aspects of the federal grants management process, including the award and monitoring processes. See 2 CFR app. I to Part 200 – Full Text of Notice of Funding Opportunity.

¹²See *Id.*

We found that awardee scores on average were higher than the total average of all applicants by nearly 20 points, indicating that DHS considered scores when selecting grantees, which is in line with the grant announcement and the Uniform Guidance.

Figure 5: Comparison of Grantee Scores by Focus Area for the CVE Grant Program



Source: GAO analysis of Department of Homeland Security grant score information. | GAO-21-216

In the grant announcement, DHS provided information on how it intended to allocate funding among the focus areas. For example, DHS stated that it intended to prioritize the Developing Resilience focus area and target funding to related activities. However, DHS ultimately prioritized funding to the Training and Engagement focus area. See appendix II for more information on the funding targets in the grant announcement and the actual award amounts.

DHS Did Not Fully Document How It Made Final Award Decisions

DHS added selection criteria during the grant-making process but did not document how its consideration of these criteria, or the awards resulting from this process, were consistent with the grant announcement. Nine months after the grant announcement, DHS added three new selection criteria—(1) affiliation with or support for law enforcement, (2) effectiveness through proven outcome measures, and (3) resource dedication and sustainability, including evidence of cost sharing—and subsequently revised an earlier list of intended awardees. According to DHS officials, the Secretary was free to accept or reject this original list of intended awardees because the Secretary had discretion under the grant announcement to consider “other factors and information” in order to make award decisions. Officials said that the additional selection criteria

were within the Secretary's discretion to add because they aligned with merit factors in the grant announcement and were in fact a new prioritization of information already submitted by applicants in response to those factors. Officials stated that DHS only reviewed applications in the top half of the scores because those in the bottom half were not competitive based on their merit scores. However, DHS did not document this process, nor how the award decisions resulting from it were consistent with the grant announcement.

According to DHS, the Secretary was authorized to consider additional criteria in awarding CVE grants. Specifically, the grant announcement states that the Secretary would consider award recommendations from other reviewing officials, but retained discretion to make award decision based on "other factors and information." DHS officials stated that this provision indicates that award recommendations are advisory and the Secretary has discretion to ask for a further review of applications before making award decisions. In this case, DHS officials said they considered scoring results to determine which applications to review and chose those in the top half of scores. DHS officials also explained that the three new selection criteria were related to the original criteria as they were listed in the grant announcement. For example, DHS officials said an applicant's affiliation with or support for law enforcement was a subset of the community resilience and prevention planning factor and frequently involved participation with law enforcement entities. In addition, DHS officials said that resource dedication and sustainability was relevant to the listed sustainability factor, which involves a project's sustainability after CVE funding ends. While the grant announcement did not require applications to include a cost-sharing component to be eligible for award, officials said that DHS could consider cost sharing as evidence of sustainability consistent with the grant announcement, if an application included it.

In June 2017, DHS created a revised selection memo that discussed the additional selection criteria and listed the 26 applications selected for awards. Prior to that, DHS issued a press release on January 13, 2017, announcing its intention to award grants to 31 applicants. Days later, the incoming administration suspended the 31 grant awards to review all CVE selection criteria in February. In April 2017, DHS directed a new round of grant application reviews based on the three new selection criteria noted above. As a result of this process, DHS awarded 26 grants in June 2017. Nineteen of the 31 applicants announced in January 2017, along with seven new applicants, were awarded grants based on the new selection priorities.

OMB guidance states that when making grant decisions agencies should evaluate the grants consistent with the criteria set forth in the grant announcement. Additionally, according to federal internal control standards, to achieve objectives and identify and respond to risks, management should clearly document all transactions and other significant events and should also implement control activities through policies.¹³ DHS's Office for Targeted Violence and Terrorism Prevention did not have a policy to fully document how its grant making decisions aligned with the grant announcement. While DHS created a selection memo that described why the 26 applications selected for award were the ones that best addressed the three additional criteria, DHS did not document how the process it employed, or the criteria it considered, aligned with the grant announcement. Further, DHS did not document how the additional selection criteria and cost-sharing components impacted scores and final award outcomes. DHS officials told us that they did not document this information because they believed that the documentation they provided—the revised June 2017 selection memo—was sufficient. However, this documentation demonstrates only that the 26 awardees met the additional criteria. It does not demonstrate that DHS considered scoring results as required by the grant announcement. Nor does it demonstrate that the new selection criteria aligned with the factors in the grant announcement or whether they were “other factors” outside the scope of the announcement.¹⁴ Without documentation demonstrating that DHS followed the grant announcement in selecting applicants for award, DHS cannot clearly show that its award decisions were defensible.

Moreover, DHS stated that it wanted to foster better trust among its CVE community partners. Developing policy to fully document how grant award decisions are made could help justify its awards to the grant community and the broader public. This is important because both grant recipients and other applicants we spoke with noted that changes between the 31 applicants announced for award in January 2017 and the 26 applicants that received an award five months later gave the appearance of bias at DHS towards certain projects. As such, DHS may have lost credibility with prospective applicants for future CVE-related grants.

¹³[GAO-14-704G](#).

¹⁴The grant announcement for the related DHS 2020 Targeted Violence and Terrorism Prevention Grant Program includes a similar clause that authorizes the Secretary to consider undefined “other factors.” This could create ambiguity in the future if award documents do not demonstrate how the “other factors” align with the factors listed in the grant announcement, as was the case with the CVE grant program.

DHS Lacks Data to Assess the Overall Effectiveness of the Countering Violent Extremism Grant Program

DHS did not obtain the necessary data from individual grantees to evaluate the overall CVE grant program. The grant announcement called for DHS to obtain performance information and data from grant recipients to enable overall program evaluation and monitoring of individual grantee progress. Further, DHS's fiscal year 2017 Report to Congress on the CVE grant program stated that DHS performance measurement is to involve regular monitoring and reporting of individual grantees' project accomplishments and progress against set goals, and that grantees' project data would be used to actively improve grant program efficiency and results. Additionally, the GPRM Modernization Act of 2010 calls for federal agencies to collect performance information and use it to address fiscal, management, and performance challenges.¹⁵

However, DHS did not have an approach to ensure grantees' performance measurement and data collection efforts were sufficient for overall program evaluation. Instead, DHS expected grantees be primarily responsible for developing their own performance metrics and data collection methods. According to DHS's March 2020 preliminary assessment report on the CVE grant program, DHS encouraged grantees to be innovative as they developed ways to measure performance in terrorism prevention programs, and chose not to provide grantees with detailed performance metrics requirements. Ultimately, according to the DHS report, no new metrics were submitted, and most grantees identified metrics that DHS had already identified. As a result, DHS's March 2020 preliminary assessment report provided an overview of grant program activities, challenges, and lessons learned, among other information, but did not provide an assessment of the extent to which the individual grant programs met their intended goals or the overall effect of the program.

DHS concluded that future similar grant programs should be prescriptive in the types of performance information grantees are to collect and ensure that applicants have the budget and capabilities to collect the necessary data. Moreover, during the course of our review, DHS acknowledged that grantees' capacity to develop project performance metrics and evaluation plans could be bolstered, and DHS plans to

¹⁵See Pub. L. No. 111-352, § 3, 124 Stat. 3866, 3867-3871 (2011) (codified at 31 U.S.C. § 1115). The performance management requirements enacted by the GPRM Modernization Act of 2010 are directed at executive departments. See 31 U.S.C. § 1115(h)(1) (incorporating the definition of an "agency" as "an Executive department" from 5 U.S.C. §§ 105, 306(f)). Our Office has reported that these requirements can also serve as leading practices at other organizational levels, including the program, project, or activity level. See GAO, *Drug Control: Actions Needed to Ensure Usefulness of Data on Suspicious Opioid Orders*, [GAO-20-118](#) (Washington, D.C.: Jan. 29, 2020).

provide more technical assistance to grantees in future programs. Better performance information could help inform decision-makers of the success of the program as well as which types of projects or aspects of projects are best for scalability and replication.

While DHS did not have the necessary information to evaluate the overall effectiveness of the CVE grant program, DHS did collect some performance information on individual grantee activities albeit it was incomplete. DHS used two key tools, the Performance Progress Reports and the Project Implementation and Evaluation Plans, to monitor individual CVE grant program activity. The Performance Progress Report (progress report) is a standard, government-wide document used by federal agencies to collect performance information, such as written narratives describing grantee progress. The CVE grant announcement called for grantees to use progress reports to report quarterly on their performance. The Project Implementation and Evaluation Plan (evaluation plan) is a DHS-approved template that grantees were to use quarterly to measure program performance through identification of expected outcomes and documentation of results. Grantees were to use the evaluation plan to document project goals and objectives; types and number of activities and services provided; number of participants and partnerships; and expected outcomes and results, among other information. DHS used grantee reports to prepare quarterly updates on grantee project activities and progress toward their stated goals, and also to prepare the March 2020 preliminary assessment report.

Although DHS used the grantee evaluation plans as a key source of performance information, these data were incomplete. For example:

- Three grantees did not submit evaluation plans to DHS in any of the eight quarters.
- In the 1st quarter, six of 26 grantees did not submit an evaluation plan to DHS.
- In the 2nd quarter, five of 26 grantees did not submit an evaluation plan to DHS for review.
- In the 5th quarter, four of 25 grantees did not submit evaluation plans.¹⁶

¹⁶There are fewer than 26 grantees beginning in the 5th quarter because two grantees dropped from the program, one in quarter 5 and one in quarter 8.

-
- In the final (8th) quarter, six of 24 grantees did not submit evaluation plans.

While DHS did not have information from all grantees, DHS officials told us they generally had collected enough information and data to conduct the type of progress analysis they intended for a pilot-type program. DHS officials told us they were starting to collect additional grantee information to conduct a broader outcomes assessment, but they did not provide any details or documentation of this effort. Further, in March 2020 DHS's Science and Technology Directorate completed assessments of four of the 26 CVE projects and noted that data that would allow comprehensive reporting on the extent programs affected any type of behavioral change was lacking. The directorate reported that the four projects collected and documented information on many activities they were conducting, but that the data were insufficient for measuring those projects' impact or effectiveness. For example, the directorate noted that the grantees collected useful measures, such as frequency of activities, but did not always collect sufficient information for other goals, such as change in attitudinal behaviors or program participation. According to the directorate, data needed to be collected at multiple points in time to assess behavior change or to be documented sufficiently to quantify program participation.

DHS's CVE grant announcement, its March 2020 preliminary assessment report, and DHS Science and Technology Directorate analysis all recognize the value of collecting sufficient and appropriate data, and using those data to help assess program effectiveness. By not assessing the effectiveness of the 2016 CVE grant program, DHS may have missed an opportunity to make important programmatic changes for future grant programs. Moving forward, taking steps to ensure grantees collect and submit appropriate performance data would enable DHS to evaluate the extent that individual grant projects and the overall grant program are achieving results. Such information would help DHS manage the program and make adjustments as warranted.

Grantees Were Generally Satisfied with Technical Assistance Provided by DHS

Grantees we surveyed generally reported satisfaction with technical assistance provided by DHS in using the monitoring tools to track their progress—the evaluation plan and progress report—but reported mixed

views about the tools themselves.¹⁷ We surveyed all 26 grantees that received awards in 2017, and received responses from 22 grantees.¹⁸

In general, grantees reported that the technical assistance they received from DHS was helpful (see appendix III question number for the specific question we asked after each bullet). Specifically,

- **General technical assistance:** 17 of 21 grantees that responded reported DHS technical assistance during the performance period to be either very helpful or somewhat helpful. The four remaining grantees reported that interactions were neither helpful nor unhelpful or somewhat unhelpful (question 21).
- **Technical assistance with evaluation plan:** 15 of 16 grantees that responded reported that the technical assistance they received from DHS on the primary reporting mechanism—the evaluation plan—was very or somewhat helpful, with only one reporting that it was neither helpful nor unhelpful (question 27).
- **DHS responsiveness:** 15 of 22 grantees that responded to the question on DHS responsiveness stated that DHS’s assistance was very responsive to their questions. The remaining seven grantees reported that DHS’s technical assistance was somewhat responsive (question 20).

However, grantees did identify some issues with program oversight, particularly with the evaluation plan and progress report management tools. For instance,

- **Usefulness of evaluation plans:** 6 of 20 grantees that responded to a question on the usefulness of the evaluation plan found that the plans could be improved (question 23). For example, grantees stated

¹⁷The Project Implementation and Evaluation Plan is a key tool used by the CVE Grant program to help measure program performance of individual grantees. It is designed to help grantees plan and manage their projects, report quarterly on project progress, and evaluate project impact. The Performance Progress Report is a standard, government-wide performance progress report used to collect performance information from federal grant recipients.

¹⁸While our survey is not generalizable, the views of the grantees that responded provide insights into the technical assistance provided by DHS. Specifically, 22 of 26 grantees responded to our survey, but not all 22 responded to each question we asked. Therefore, due to item non-response, there are different size denominators for some responses. Item non-response has the potential to introduce bias in survey results if respondents and non-respondents are systematically different according to key characteristics. For a summary of responses to select survey questions, see appendix III.

that in some cases DHS required too much information or did not provide enough space for reporting on progress of the grant, indicating a mismatch in DHS reporting requirements and requirements grantees believed DHS needed to administer the program (question 24). Five grantees reported that the evaluation plan did not meet the needs of the organization or lacked needed flexibility (question 23a). Another grantee stated that the information requested in the plan was overly repetitive (question 24).

- **Usefulness of the progress reports:** 8 of 21 grantees that responded to a question on the usefulness of the progress reports found the reports to be neither helpful nor unhelpful or somewhat unhelpful (question 29). Six grantees stated that the progress report added no value or was redundant with the evaluation plan report (question 29a).

In addition, respondents commented on their satisfaction with DHS's communication and responsiveness before the award period. For instance, 10 of 20 grantees that responded indicated that they were either very satisfied or somewhat satisfied with how DHS managed the awards process. Ten grantees reported that they were neither satisfied nor unsatisfied or were unsatisfied with the process (question 17). When asked to explain their responses, five grantees indicated that the process lacked transparency and that too little information about what was transpiring with awards added confusion to the grant-making process. An additional three indicated that the delay in awarding the grant affected their momentum to get their activities underway. Two grantees stated that the delay obscured the intentions of the program, adding to a perception of bias towards certain programs (question 17a).

Conclusions

Countering violent extremism focuses on reducing individual and societal risk factors associated with extremist ideologies and intervening with individuals on the path to violence. DHS developed its 2016 Countering Violent Extremism grant program to help counter this threat and encouraged development of a variety of programs hoping to expand and replicate successful projects across a broader number of communities. Given the past casualties from violent extremism and DHS's desire to leverage this grant program throughout the country, documentation on the rationale for selecting grantees could help ensure confidence in the grant-making process and equity in selection. Finally, building on current efforts and taking steps to ensure grantees collect and submit data to enable program evaluation will help ensure DHS has the information to determine whether grant programs are achieving their intended outcomes

and to identify programs that may warrant replication in other communities.

Recommendations for Executive Action

We are making the following two recommendations to DHS:

The Director for the Office for Targeted Violence and Terrorism Prevention should develop policy to ensure the Office documents its rationale for grant-making decisions for future CVE-related grant programs. (Recommendation 1)

The Director for the Office for Targeted Violence and Terrorism Prevention should take steps to ensure grantees collect and submit data that would enable evaluation of individual grant and overall grant program achievement of intended outcomes for future CVE-related grant programs. (Recommendation 2)

Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. In its comments, reproduced in appendix IV, DHS concurred with our two recommendations and described current and planned actions to address them. DHS also provided technical comments, which we incorporated into this report as appropriate.

With regard to our first recommendation, that the Office for Targeted Violence and Terrorism Prevention should develop policy to ensure it documents its rationale for grant-making decisions for future CVE-related grant programs, DHS stated that it documented these decisions for the fiscal year 2020 Targeted Violence and Terrorism Prevention Grant Program in a decision memo issued by the Office of Strategy, Policy, and Plans. Additionally, DHS stated the Office for Targeted Violence and Terrorism Prevention made this policy a requirement for future awards and the requirement will be documented in a Targeted Violence and Terrorism Prevention Grants Management Plan, which DHS expects to complete by September 30, 2021.

With regard to our second recommendation, that the Office for Targeted Violence and Terrorism Prevention should take steps to ensure grantees collect and submit data to enable evaluation of individual grant and overall grant program achievement of intended outcomes for future CVE-related grant programs, DHS highlighted recent relevant changes to its fiscal year 2020 Targeted Violence and Terrorism Prevention Grant Program. Specifically, DHS noted that the new grant program's Notice of Funding Opportunity required its applicants to include specific performance measures sufficient to evaluate whether grant projects and

the overall grant program are successful in achieving indented outcomes. DHS stated that the Office for Targeted Violence and Terrorism Prevention documented this process in its Targeted Violence and Terrorism Prevention Grant Program Evaluation Plan dated December 22, 2020. DHS further stated that this plan documents the elements of evaluating the grant awardees and outlines the requirements for evaluating overall grant program outcome. However, DHS did not provide a copy of the plan. Once we receive the plan—and as the fiscal year 2020 grant program progresses—we will assess the extent to which these actions address our recommendation.

We are sending copies of this report to the appropriate congressional committees, the Acting Secretary of Homeland Security, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at 202-512-8777 or McNeilT@gao.gov. Contact points for our Office of Congressional Relations and Public Affairs may be found on the last page of our report. GAO staff who made key contributions to this report are listed in appendix V.



Triana McNeil
Director, Homeland Security and Justice

Appendix I: Objectives, Scope, and Methodology

This report examines (1) the extent to which DHS announced, reviewed, and awarded CVE grants in accordance with Office of Management and Budget (OMB) guidance; (2) the extent to which DHS evaluated the performance of CVE grantees and the overall CVE Grant Program; and (3) grantees' views on technical assistance DHS provided and other grant management practices.

To determine the extent to which DHS adhered to OMB guidance to announce a grant opportunity, review applications, and award grants, we reviewed OMB's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), which provides government-wide policies and procedures for the award and administration of federal grants, and DHS's Countering Violent Extremism Grant Program Notice of Funding Opportunity (grant announcement).¹ We also reviewed federal internal control standards related to implementing control activities through policies and documenting key decisions.² We spoke with DHS officials and assessed DHS grants management procedures and documents on grantee selection to determine the extent that the rationale for award decisions was documented and aligned with information in the grant announcement.

We reviewed and analyzed the applications for 197 applicants whose applications were scored by DHS, which represented all complete applications that qualified for the grant for the 2-year performance period (2017-2019). We reviewed the documented scoring procedure and analyzed the scores and rationales provided by each DHS scoring official. We determined the scoring data to be reliable for presenting the scores, although we found a small number of applications with certain missing scores or no rationale provided for the score selected. The number of missing scores was very small in comparison to all scores, and DHS explained that these were missing because of a faulty electronic transfer of information from one file to the database of record. We also found one discrepancy in how DHS calculated the scores, which DHS acknowledged was incorrect. However, we were able to tabulate scores independently. While scores generally changed only slightly because of this small discrepancy, we present the actual scores and not DHS's calculated scores. In addition to the applications and scores, we reviewed DHS's available decision documents and announcements regarding the

¹See 2 C.F.R. pt. 200.

²GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

applicants' selection. We compared the scores and the information in the decision documents to the grant announcement and the Uniform Guidance.

We spoke with DHS officials from the Office for Targeted Violence and Terrorism Prevention and from the Office of General Counsel about how the department interpreted and implemented the grant announcement consistent with the Uniform Guidance. We also obtained information from four applicants through interviews and 22 grantees through administering a survey (including state and local government agencies, institutions of higher learning, and nonprofit organizations) about their views on DHS's management of the CVE grant program, including its effect on their organization and the larger communities operating in the targeted violence and terrorism prevention environment.

To determine the extent to which DHS evaluated the performance of CVE grantee projects and the overall CVE grant program, we identified the required evaluation steps outlined in the CVE grant announcement, DHS's fiscal year 2017 Report to Congress on the CVE Grant Program, and the GPRM Modernization Act of 2010.³ We also reviewed and analyzed quarterly progress reports and performance reports submitted to DHS by grantees for 4 of the 8 quarters included in the 2-year performance period beginning in 2017 (quarters 1, 2, 5, and 8). Specifically, we reviewed the narratives and other information in these reports to determine if information that related to goals, outcomes, and measures were present. Additionally, we reviewed DHS's six quarterly summaries of grantee progress reports at the end of the original 2-year performance period (2017 to 2019)⁴ for information such as grantee reported activities and progress reported by DHS in its quarterly reports, and the March 2020 preliminary DHS report on its assessment of the CVE Grant Program, including grantee activities, outputs, and outcomes. Further, we reviewed the DHS Science and Technology Directorate's four assessments of individual CVE grant projects, conducted for the purpose

³See Pub. L. No. 111-352, § 3, 124 Stat. 3866, 3867-3871 (2011) (codified at 31 U.S.C. § 1115). The performance management requirements enacted by the GPRM Modernization Act of 2010 are directed at executive departments. See 31 U.S.C. § 1115(h)(1) (incorporating the definition of an "agency" as "an Executive department" from 5 U.S.C. §§ 105, 306(f)). Our Office has reported that these requirements can also serve as leading practices at other organizational levels, including the program, project, or activity level. See GAO, *Drug Control: Actions Needed to Ensure Usefulness of Data on Suspicious Opioid Orders*, [GAO-20-118](#) (Washington, D.C.: Jan. 29, 2020).

⁴DHS combined quarters one and two for the first quarterly report and did not prepare a quarterly report for the last quarter, quarter eight, of the 2-year performance period.

of assessing the effectiveness of terrorism prevention efforts completed in 2020. The Directorate conducts basic and applied research, development, demonstration, testing and evaluation activities relevant to DHS programs. Finally, we spoke with Office for Targeted Violence and Terrorism Prevention officials regarding their monitoring and assessment responsibilities, and their methodology for preparing the preliminary report on the grant program.

To obtain views from grantees about the technical assistance provided by DHS and other grant management practices, we sent a survey to all 26 grantees via email in January 2020 and requested a response within 2 weeks. We also conducted follow-up by email and phone calls to the grantees who had not responded in that timeframe. We received 22 responses. Of the four grantees who chose not to respond, one dropped from the grant program after the 4th quarter and another dropped after the 7th quarter, and current administrators in two other programs told us that the administrators who could best respond to our questions were no longer with their organization. To reduce response error, we pre-tested our survey questions with four grantees before administering to all grantees and made changes based on their feedback. In addition, after completing the fieldwork, we examined responses for logical consistency and made edits, as needed. Based on the responses of 22 of 26 grantees, the results provide the views of most grantees in the program but are not generalizable to the four grantees who did not participate.

To provide contextual information on the number of domestic attacks and deaths associated with violent extremism or targeted violence from 2010 through 2019, we obtained information from the Extremist Crime Database (the database), which is a joint project for collecting and

reporting data on extremist-related violence.⁵ We assessed the reliability of the database through review of database documentation and interviews with the Extremist Crime Database principal investigators. We also reviewed publicly available articles to verify the data. We verified the information by comparing it with information in our 2017 report, which contained similar violent extremist incident data from years 2001 through 2016, and reviewing publicly available articles and reports to verify location and number of deaths reported by year.⁶ We determined that this data source was sufficiently reliable for providing background information on violent extremism in the United States, including the number of attacks and deaths by ideological motivation, year, and location.

The data in the database cover a wide range of attacks with respect to the perceived tie to ideological motivation of the perpetrator, and database researchers rank ideological motivation from a low of 0 to a high of 4. For example, a ranking of 0 would be assigned to an attack by a perpetrator with no affiliation with ideology, such as anti-government, radical Islamist, or white supremacy sentiments. To determine the number of attacks and deaths, we only considered attacks where the strength of the ideological motivation had been ranked 2 through 4 and excluded attacks ranked as 0 or 1.

⁵The database originally was associated with the DHS Emeritus Center of Excellence National Consortium for the Study of Terrorism and Responses to Terrorism. It is now a privately funded project but uses the same methodology and is managed by the same principal researchers as it did when it was receiving funding from DHS. The Extremist Crime Database Research Team is comprised of Dr. Steven Chermak, Michigan State University; Dr. Joshua Freilich, John Jay College of Criminal Justice; Dr. Jeff Gruenewald, University of Arkansas; Dr. William Parkin, Seattle University; Dr. Colleen Mills, Penn State Abington; and Celinet Duran, State University of New York Oswego. For more information on the database, see Freilich, J., Chermak, S., Belli, R., Gruenewald, J., & W. Parkin. (2014). Introducing the Extremist Crime Database (ECDB). *Terrorism & Political Violence*, 26, 372-384; and Chermak, S., Freilich, J., Parkin, W., & J. Lynch. (2012). American Terrorism and Extremist Data Sources and Selectivity Bias: An Investigation Focusing on Homicide Events Committed by Far-Right Extremists. *Journal of Quantitative Criminology*, 28(1), 191-218.

⁶GAO, *Countering Violent Extremism: Actions Needed to Define Strategy and Assess Progress of Federal Efforts*, [GAO-17-300](#) (Washington, D.C.: Apr. 6, 2017).

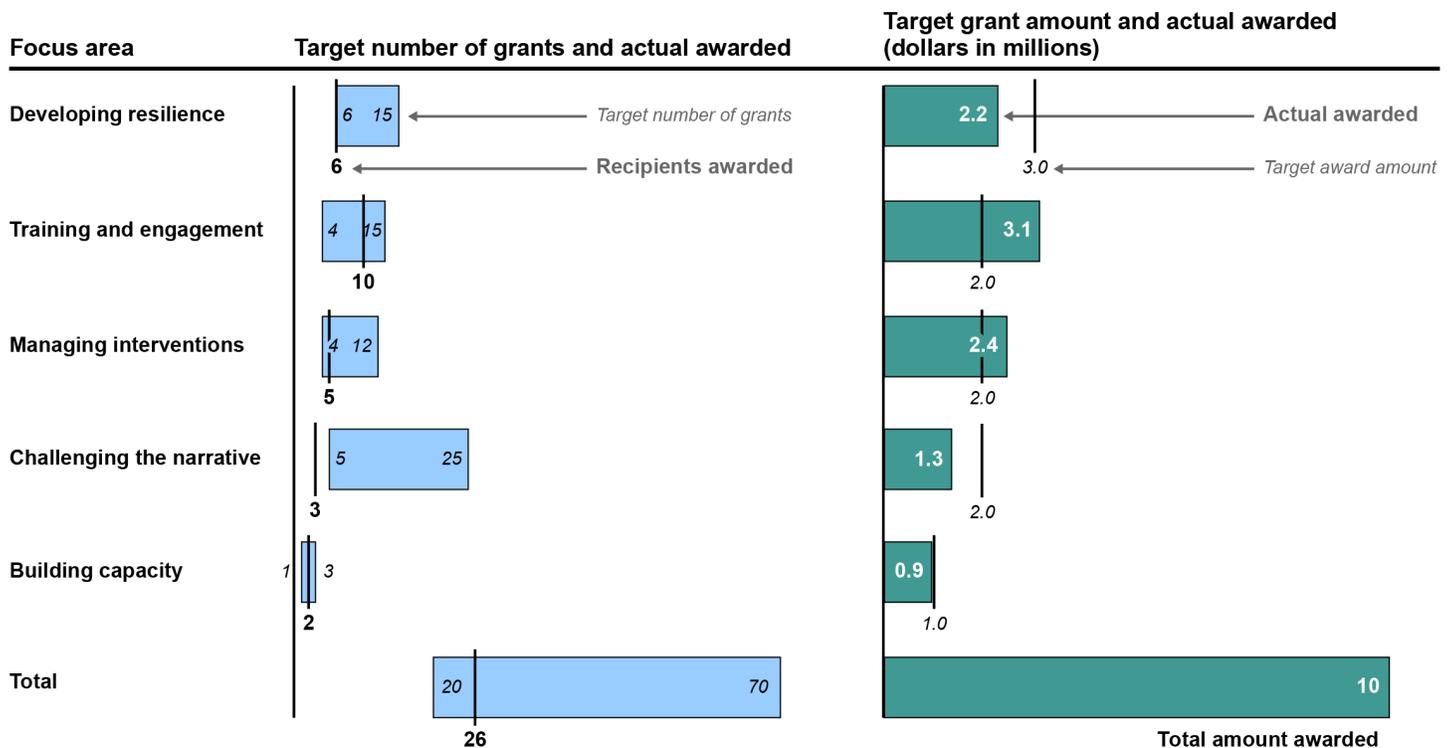
Appendix II: Selected Grant Information for DHS's Countering Violent Extremism Grant Program

The Department of Homeland Security (DHS) awarded 26 grants through the Countering Violent Extremism (CVE) Grant Program in 2017. The 26 grants were awarded across five focus areas: (1) developing community resilience, (2) training and engagement, (3) managing interventions, (4) challenging the narrative, and (5) building capacity.

Countering Violent Extremism Grant Program Targets

As noted in figure 6, DHS met its targets for the number of grants to award in four of the five focus areas. The department did not meet its target for the challenging the narrative focus area. With regard to the funding targets, the department did not meet its targets for three of the five focus areas. For instance, while DHS awarded 90 percent of its targeted grant-funding amount for the building capacity focus area, it awarded over 150 percent of its targeted amount for training and engagement.

Figure 6: Targets for Awarding Grants Published in DHS's Countering Violent Extremism Notice of Funding Opportunity and Actual Amounts Awarded by Focus Area



Source: GAO analysis of Department of Homeland Security information. | GAO-21-216

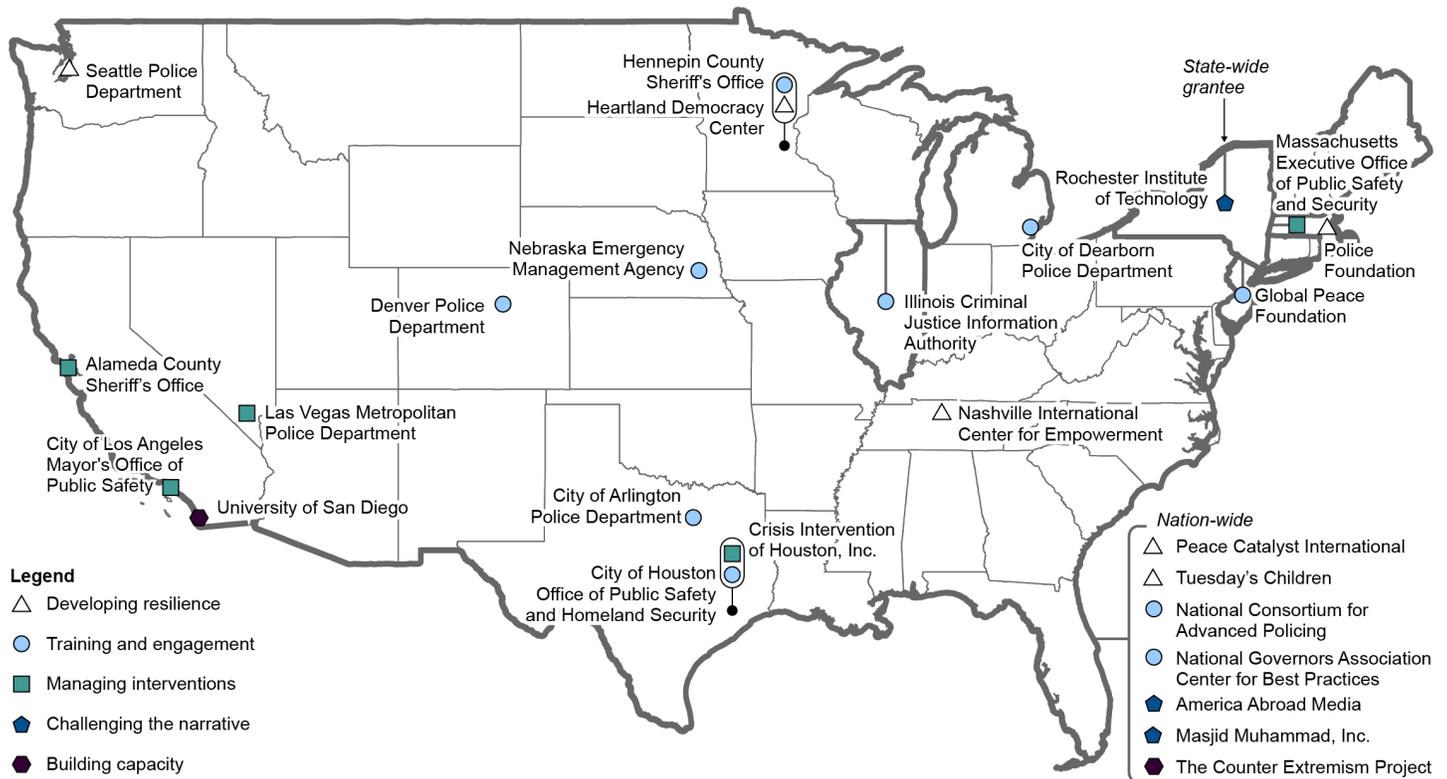
Appendix II: Selected Grant Information for DHS's Countering Violent Extremism Grant Program

DHS officials partially attributed these outcomes to the number of qualified applicants that requested the larger grant amounts allowed for each focus area. DHS officials also told us that evolving policy priorities impacted the final awarded amounts. Finally, DHS officials noted that the funding targets they published in the grant announcement were based on imperfect and incomplete information, and DHS was not bound to make awards using the targets.

Countering Violent Extremism Grant Program Awardees

Figure 7 below shows the 26 awards, their geographic scope, and the focus area for each grant.

Figure 7: Location and Award Focus Area for the 26 Countering Violent Extremism Program Grantees



Source: GAO analysis of Department of Homeland Security information. | GAO-21-216

In January 2017, DHS issued a press release announcing its intention to award CVE grants to 31 applicants. The awards were suspended to allow the new Secretary to consider program priorities, after which the

**Appendix II: Selected Grant Information for
DHS's Countering Violent Extremism Grant
Program**

Secretary directed a further review based on additional selection criteria. DHS subsequently awarded 26 grants. Of the 26 grantees, 19 were part of the original announcement and seven were not.

Table 1 lists the 31 applicants announced for award in January 2017 and the revised award decisions in June 2017.

Table 1: Countering Violent Extremism Grant Program Applicants Announced for Award and Applicants that Received Award by Focus Area

Organization	Originally Announced as Intent to Award	Awarded	Program Scope
Focus Area: Developing Resilience			
1) Coptic Orthodox Charities	●	—	Nationwide
2) Ka Joog Nonprofit Organization	●	—	Minneapolis, Minnesota
3) Heartland Democracy Center	●	●	Minneapolis, Minnesota
4) Leaders Advancing and Helping Communities	●	—	Dearborn, Michigan
5) Music in Common	●	—	Nationwide
6) Nashville International Center for Empowerment	—	●	Nashville, Tennessee
7) Peace Catalyst International	●	●	Nationwide
8) Police Foundation	●	●	Boston, Massachusetts
9) Seattle Police Department	—	●	Seattle, Washington
10) Tuesday's Children	●	●	Nationwide
Focus Area: Training and Engagement			
11) City of Arlington Police	●	●	Arlington, Texas
12) City of Dearborn Police Department	●	●	Dearborn, Michigan
13) City of Houston, Mayor's Office of Public Safety & Homeland Security	●	●	Houston, Texas
14) City of Los Angeles, Mayor's Office of Public Safety	●	—	Los Angeles, California
15) Denver Police Department	●	●	Denver, Colorado
16) Hennepin County Sheriff's Office	—	●	Minneapolis, Minnesota
17) Global Peace Foundation	●	●	New Jersey
18) Illinois Criminal Justice Information Authority	●	●	Illinois
19) National Consortium for Advanced Policing	●	●	Nationwide
20) National Governors Association (NGA) Center for Best Practices	—	●	Nationwide
21) Nebraska Emergency Management Agency	●	●	Nebraska
Focus Area: Managing Interventions			
22) Alameda County Sheriff's Office	—	●	Alameda, California

**Appendix II: Selected Grant Information for
DHS's Countering Violent Extremism Grant
Program**

Organization	Originally Announced as Intent to Award	Awarded	Program Scope
23) City of Los Angeles, Mayor's Office of Public Safety	●	●	Los Angeles, California
24) Crisis Intervention of Houston, Inc.	●	●	Houston
25) Las Vegas Metropolitan Police Department	●	●	Las Vegas, Nevada
26) Life After Hate Inc	●	—	Nationwide
27) Muslim Public Affairs Council Foundation	●	—	Nationwide
28) Massachusetts Executive Office of Public Safety and Security	—	●	Massachusetts
Challenging the Narrative			
29) Project Help Nevada, Inc.	●	—	Reno, Nevada
30) Unity Productions Foundation	●	—	Nationwide
31) America Abroad Media	●	●	Nationwide
32) Rochester Institute of Technology	●	●	Nationwide
33) Masjid Muhammad, Inc.	●	●	Nationwide
34) The University of North Carolina at Chapel Hill	●	—	Nationwide
35) Muslim American Leadership Alliance	●	—	Nationwide
Building Capacity			
36) Counter Extremism Project	●	●	New York, New York
37) Claremont School of Theology	●	—	Los Angeles, California
38) University of San Diego	—	●	San Diego, California

Source: GAO analysis of Department of Homeland Security Countering Violent Extremist Grant Program information. | GAO-21-216

Appendix III: Selected Responses from DHS's Countering Violent Extremism Grant Program Grantees

We conducted a survey of all 26 grantees through the Department of Homeland Security (DHS) Countering Violent Extremism (CVE) Grant Program. Twenty-two grantees responded to our survey. Below is a selection of the questions we asked respondents to better understand how grantees viewed the award process, technical assistance, management, and success of the program. Not all respondents answered every question, and the total number of respondents is provided for each question to clarify how many organizations provided information.

1. At any point beginning in 2010, had your organization been engaged in activities or programs related to countering violent extremism (CVE) NOT including activities related to the CVE Grant Program beginning in 2017?

Total Number of Respondents = 22		
Yes	No	Total
11	11	22

2. Since 2010, how many years or months had your organization been engaged in activities or programs related to CVE NOT including activities related to the CVE Grant Program?

Total Number of Respondents = 11					
Years	0-3	4-6	7-9	10+	Total
Total	2	3	0	6	11

3. Very briefly, what were the main aims or goals of these activities or programs?

Total Number of respondents = 11	
Category of Response	Count of responses
CVE Research	1
Community building or assistance to communities, including community programming	6
Support to federal, state, or local agencies with training, programs (such as police programming), or policy-making	5
Developing IT systems to combat violent extremist groups	1
Defendant and community programming related to one specific violent extremist event	1
Online Media Campaigns	1

Note: Responses were open-ended, then coded and aggregated. Respondents sometimes provided information that resulted in more than one coded response.

**Appendix III: Selected Responses from DHS's
Countering Violent Extremism Grant Program
Grantees**

4. What was the target audience? In other words, which potential recipients or program beneficiaries did you identify because of their membership in groups such as law enforcement agencies or communities vulnerable to radicalization or violent extremism?

	Count of Responses
Total Organizations Responding = 11	
Community Leaders	10
State, County, or Municipal Agencies	7
Advocacy Groups	5
Law Enforcement	5
Universities	1
Federal Leadership	1
Media, national organizations with an interest	1
Family members of victims of terrorism and mass violence, family members of military service members, first responders and their family members.	1
Mental Health Professionals	1

Note: Responses were open-ended, then coded and aggregated. Respondents sometimes provided information that resulted in more than one coded response.

5. How did you first learn about the CVE Grant Program?

Total Number of respondents = 18	
Category of Response	Count of responses
Federal Announcement	3
Independent research	3
3rd party contact	6
DHS contact	5
State authority contacts	1

6. How clear or unclear were the instructions in the [Notice of Funding Opportunity](#) or grant announcement?

Total Number of Respondents = 20					
Very Clear	Somewhat Clear	Neither Clear or Unclear	Somewhat unclear	Very Unclear	Total
8	11	0	1	0	20

**Appendix III: Selected Responses from DHS's
Countering Violent Extremism Grant Program
Grantees**

7. How clear or unclear was the description of the purpose of the CVE Grant Program in the grant announcement?

Total Number of Respondents = 20					
Very Clear	Somewhat Clear	Neither Clear or Unclear	Somewhat unclear	Very Unclear	Total
8	11	1	0	0	20

8. DHS had some organizational changes to the office responsible for the CVE Grant Program such as using the term "Terrorism Prevention" in place of "CVE". Are you aware of these changes?

Total Number of Respondents = 21		
Yes	No	Total
18	3	21

9. As far as you are aware, did any of these organizational changes have an impact on the *goals, priorities, methods or processes* of the project your organization implemented under the CVE Grant Program, including how you interacted with your target audience?

Total Number of Respondents = 17		
Yes	No	Total
7	10	17

a Very briefly, what impact did the organizational changes have on the project your organization implemented under the CVE Grant Program?

Total Number of respondents = 7	
Category of Response	Count of responses
Positive Responses	
Beneficial change in approach– Unlinked "CVE" and Muslim community	1
No major disruptions / No indications of problems to program	2
Negative Responses	
Lost partners because of delays	1
Slowed project planning	1
Exacerbated misconceptions of CVE work and terminology	2
Lost valuable DHS contact	1

Note: Responses were open-ended, then coded and aggregated. Respondents sometimes provided information that resulted in more than one coded response.

**Appendix III: Selected Responses from DHS's
Countering Violent Extremism Grant Program
Grantees**

10. During the period of time in which you were completing the application materials and prior to DHS making its grant announcement in June 2017, how accessible or inaccessible were DHS staff members to requests for technical assistance?

Total Number of Respondents = 20					
Very Accessible	Somewhat Accessible	Neither Accessible Nor Inaccessible	Somewhat Inaccessible	Very Inaccessible	Total
6	5	6	2	1	20

11. During the time in which you were completing the application materials and prior to DHS making its grant announcement in June 2017, did DHS provide any technical assistance to your organization?

Total Number of Respondents = 20		
Yes	No	Total
10	10	20

a Very briefly, what type of technical assistance did DHS provide?

Total Number of respondents = 10	
Category of Response	Count of responses
All aspects of programming and data requirements, including evaluation	3
Application requirements and processes	2
Changes related to change in Administration	1
Miscellaneous	4

12. How helpful or unhelpful was the technical assistance DHS provided your organization prior to its grant announcement in June 2017?

Total Number of Respondents = 10					
Very Helpful	Somewhat Helpful	Neither Helpful Nor Unhelpful	Somewhat Unhelpful	Very Unhelpful	Total
6	3	1	—	—	10

13. Very briefly, please provide any additional information that you think we should know regarding the technical assistance that DHS may or may not have provided prior to its grant announcement in June 2017.

Total Number of respondents = 9

Category of Response	Count of responses
Helped understanding expectations	1
TA was lacking or none provided	3
No need for TA	2
Other Response	3

14. At any point after January 2017, did DHS directly correspond with your organization in any way to explain that the [original awards announced in early 2017](#) were being put on hold?

Total Number of Respondents = 21

Yes	No	Total
14	7	21

15. How did DHS correspond with you to indicate it was changing the original awards announced in early 2017?

Total Number of Respondents = 14

In Person	By Phone	Email
5	8	11

16. Did DHS explain the reason for changing the original awards?

Total Number of Respondents = 14

Yes	No	Total
8	6	14

a Very briefly, what explanation did DHS provide for changing the original award announcement?

Total Number of respondents = 6

Category of Response	Count of responses
Program undergoing a review with new administration	5
Groups declined funding	1
Some original announced were not in compliance of standards in the grant announcement	1

**Appendix III: Selected Responses from DHS's
Countering Violent Extremism Grant Program
Grantees**

Note: Responses were open-ended, then coded and aggregated. Respondents sometimes provided information that resulted in more than one coded response.

17. How satisfied or dissatisfied are you with how DHS managed the award notification process?

Total Number of Respondents = 20					
Very Satisfied	Somewhat Satisfied	Neither Satisfied nor Dissatisfied	Somewhat Dissatisfied	Very Dissatisfied	Total
3	7	6	1	3	20

a Very briefly, please explain your response.

Total Number of respondents = 15	
Category of Response	Count of responses
Positive Responses	
DHS worked well/no issue	4
Gave opportunity to address implementation plan	1
Negative Responses	
Lack of transparency / limited information/ added confusion	5
Affected momentum / took a long time	3
Affected appearance, added confusion, or obscured intentions of the Program	2

18. After your organization began work authorized under the CVE Grant Program, did DHS assign your organization a dedicated DHS staff person to contact for questions and guidance regarding your grant?

Total Number of Respondents = 22		
Yes	No	Total
22	—	22

**Appendix III: Selected Responses from DHS's
Countering Violent Extremism Grant Program
Grantees**

a Very generally, what was the nature of the assistance provided by that person?

Total Number of respondents = 21

Category of Response	Count of responses
Program guidance / project management	11
Budgeting, Expenditure, and financial administrative requirements	5
Administrative Support	4
Reporting requirements	5

Note: Responses were open-ended, then coded and aggregated. Respondents sometimes provided information that resulted in more than one coded response.

19. In what ways have you interacted with the dedicated DHS staff person to discuss questions or guidance regarding your grant?

Total Number of Respondents = 22

In Person	By Phone	Email	Other (online presentations and meetings via Adobe connect)	
8	20	22		1

20. After your organization began work authorized under the CVE Grant Program, how responsive, if at all, was the dedicated DHS staff person to any questions or requests for guidance regarding your grant?

Total number of respondents = 22

Very Responsive	Somewhat Responsive	Not at all Responsive	Total
15	7	—	22

21. How helpful or unhelpful was the technical assistance provided by the dedicated DHS staff person?

Total Number of Respondents = 21

Very Helpful	Somewhat Helpful	Neither Helpful Nor Unhelpful	Somewhat Unhelpful	Very Unhelpful	Total
10	7	2	2	—	21

**Appendix III: Selected Responses from DHS's
Countering Violent Extremism Grant Program
Grantees**

22. The Project Implementation and Evaluation Plan or PIEP is a reporting tool used to describe CVE Grant Program activities, anticipated outputs and deliverables, project operations, and program progress on a quarterly basis. Did you complete a PIEP at any point after your organization began work authorized under the CVE grant?

Total Number of Respondents = 22		
Yes	No	Total
20	2	22

23. Overall, how helpful or unhelpful has completing PIEPs been in terms of enabling your organization to monitor the progress of your CVE grant?

Total Number of Respondents = 20					
Very Helpful	Somewhat Helpful	Neither Helpful Nor Unhelpful	Somewhat Unhelpful	Very Unhelpful	Total
3	11	3	1	2	20

a Please explain your response

Total Number of respondents = 18	
Category of Response	Count of responses
Positive Responses	
Keeping project management on track; prioritizing program goals	10
Identify and evaluate and performance measures	1
Miscellaneous	2
Negative Responses	
Lacked flexibility/Did not align with program needs	5
Cumbersome/Confusing	4

Note: Responses were open-ended, then coded and aggregated. Respondents sometimes provided information that resulted in more than one coded response.

24. What section or sections of the PIEP, if any, did you find particularly helpful or unhelpful in enabling your organization to monitor the progress of the CVE grant?

Total Number of respondents = 20	
Category of Response	Count of responses
Positive Responses	
collecting data on outputs and outcomes	11

**Appendix III: Selected Responses from DHS's
Countering Violent Extremism Grant Program
Grantees**

Total Number of respondents = 20	
Category of Response	Count of responses
Project management and Progress reporting	12
Risk management	1
Examples provided were helpful	1
Negative Responses	
collecting data on outputs and outcomes	1
Too much information required	2
Project management and Progress reporting	1
Some required info became repetitive	1
Not enough space for reporting	1
Risk management	1

Note: Responses were open-ended, then coded and aggregated. Respondents sometimes provided information that resulted in more than one coded response.

25. Did DHS provide your organization any technical assistance with the development of the PIEP?

Total Number of Respondents = 20		
Yes	No	Total
16	4	20

a Very generally, what was the nature of this technical assistance?

Total Number of respondents = 16	
Category of Response	Count of responses
How to quantify, report activities	2
Feedback on PIEP development and updates how to develop/update PIEP	11
Collecting data requirements	2
Inconsistency in collecting data requirements	1

26. How responsive, if at all, was DHS to any questions or requests for guidance you may have had regarding the development of the PIEP?

Total number of respondents = 16			
DHS responsiveness to request for guidance on PIEP			
Very Responsive	Somewhat Responsive	Not at all Responsive	Total
11	5	—	16

**Appendix III: Selected Responses from DHS's
Countering Violent Extremism Grant Program
Grantees**

27. How helpful or unhelpful was the technical assistance provided by DHS?

Total Number of Respondents = 16					
Very Helpful	Somewhat Helpful	Neither Helpful Nor Unhelpful	Somewhat Unhelpful	Very Unhelpful	Total
7	8	1	—	—	16

28. In terms of helping your organization to monitor grant progress, is the PIEP more helpful, equally helpful or less helpful than the reporting tools?

Total number of respondents = 13			
More Helpful	Equally Helpful	Less Helpful	Total
1	7	5	13

a Very briefly, please explain your response.

Total Number of respondents = 10	
Category of Response	Count of responses
Positive Responses	
Tracking performance and progress	4
PIEP Narrative summary section	1
Negative Responses	
Usefulness to practitioners	2
Tracking performance and progress	4
Lots of reporting requirements not explained upfront	1

Note: Responses were open-ended, then coded and aggregated. Respondents sometimes provided information that resulted in more than one coded response.

29. Overall, how helpful or unhelpful has completing SF-PPRs been in terms of enabling your organization to comply with the timeframes and schedule of the CVE grant?

Total Number of Respondents = 21					
Very Helpful	Somewhat Helpful	Neither Helpful Nor Unhelpful	Somewhat Unhelpful	Very Unhelpful	Total
4	9	5	3	—	21

**Appendix III: Selected Responses from DHS's
Countering Violent Extremism Grant Program
Grantees**

a Please explain your response.

Total Number of respondents = 19	
Category of Response	Count of responses
Positive Responses	
monitoring progress/project planning– show evolution and transparency of project	6
effectiveness of summarizing program results	2
Allowed for more information to be explained that could not be in the PIEP	2
Helped to explain to DHS opportunities where it could be involved	1
Negative Responses	
monitoring progress/project planning– show evolution and transparency of project	1
Added no value/redundant/used as a cover sheet	6
Time consuming	1
Required learning multiple systems to navigate and submit info / difficulty Accessing	2

Note: Responses were open-ended, then coded and aggregated. Respondents sometimes provided information that resulted in more than one coded response.

30. In your opinion, how successful, if at all, has your CVE-related project been in meeting the goals described in the [Notice of Funding Opportunity](#) (grant announcement)?

Total number of respondents = 21			
Very Successful	Somewhat Successful	Not at all Successful	Total
17	4	–	21

31. State and local partners can also fund CVE activities through the DHS Homeland Security Grant Program or HSGP. Were you aware that HSGP funding could be used for CVE purposes?

Total Number of Respondents = 22		
Yes	No	Total
5	17	22

**Appendix III: Selected Responses from DHS's
Countering Violent Extremism Grant Program
Grantees**

32. Given your experience with the CVE Grant Program, what changes in the program, if any, would you suggest to best support your organization's CVE activities?

Total Number of respondents = 19

Category of Response	Count of responses
Consider removing the terms of CVE or terrorism prevention	3
Provide more resources for understanding CVE landscape and previous approaches that worked such as research, international best practices, more substantive relationships with CVE program officials, or encourage more interaction with other CVE grantees	6
Emphasize public health model and/or completely divorce program from law enforcement type agencies/DHS	4
Improve programmatic, administrative, and reporting requirements and system reporting capabilities (e.g., revising the logic model, better guidance for closeout)	6
Continue funding grant program / longer funding timeline	4
Emphasize broader set threats instead of targeting only Muslim community, address current political climate that stigmatizes Muslim community	1
Change FOIA laws so CVE research is not subject to FOIA	1
Work harder to get community buy-in	1

Note: Responses were open-ended, then coded and aggregated. Respondents sometimes provided information that resulted in more than one coded response.

Appendix IV: Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

January 11, 2021

Ms. Triana D. McNeil
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Management Response to Draft Report GAO-21-216, "COUNTERING VIOLENT EXTREMISM: DHS Needs to Improve Grants Management and Data Collection"

Dear Ms. McNeil,

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's recognition of the threat of targeted violence and terrorism, as well as validating DHS's positive prevention approaches funded through the DHS Fiscal Year (FY) 2016 Countering Violent Extremism (CVE) Grant Program and the FY 2020 Targeted Violence and Terrorism Prevention (TVTP) Grant Program.

The GAO's draft report also included issues that DHS previously identified in a preliminary assessment report of the FY 2016 CVE grant program, "Fiscal Year 2016 Countering Violent Extremism Grant Program," dated March 26, 2020. While some of these issues were a result of delays associated with the 2017 presidential transition, others resulted from a lack of dedicated resources for grant management.

DHS remains committed to improving the management and effectiveness of the TVTP Grant Program, including implementing procedures to enhance accountability and transparency. For example, the lessons learned and promising practices of the FY 2016 CVE grant program identified in the March 2020 DHS preliminary assessment report were fully incorporated into the management of the FY 2020 TVTP Grant Program.

The draft report contained two recommendations with which the Department concurs. Attached find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy issues under a separate cover for GAO's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

**JIM H
CRUMPACKER**

Digitally signed by JIM H
CRUMPACKER
Date: 2021.01.11 12:09:39 -05'00'

JIM H. CRUMPACKER, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Attachment

**Attachment: Management Response to Recommendations
Contained in GAO Report Number GAO-21-216**

GAO recommended that the Acting Director for Office for Targeted Violence and Terrorism Prevention (OTVTP):

Recommendation 1: Develop policy to ensure the Office documents its rationale for grant-making decisions for future CVE-related grant programs.

Response: Concur. DHS documented the rationale for grant-making decisions in the FY 2020 TVTP Grant Program via a Decision Memo dated August 26, 2020, signed by the Senior Official Performing the Duties of the Under Secretary for the Office of Strategy, Policy, and Plans. This memo authorized the Federal Emergency Management Agency to begin granting awards. Additionally, OTVTP made this a program requirement for future awards, which will be documented in the forthcoming TVTP Grants Management Plan, which is overseen by the Associate Director for Grants and Innovation. Estimated Completion Date: September 30, 2021.

Recommendation 2: Take steps to ensure grantees collect and submit data that would enable evaluation of individual grant and overall grant program achievement of intended outcomes for future CVE-related grant programs.

Response: Concur. In March 2020, the FY 2020 TVTP Grant Program Notice of Funding Opportunity required applicants to include specific performance measures, based on each project type included in their application, and which are sufficient to evaluate whether the projects and the overall grant program are successful in achieving their intended outcomes. OTVTP documented this process in the TVTP Grant Program Evaluation Plan, dated December 22, 2020. The evaluation plan documents the elements of evaluating TVTP grant awardees and includes the roles and responsibilities for routine performance measurement and implementation evaluations for the grantees. The plan also outlines the requirements for outcome evaluations for the overall grant program.

DHS requests that the GAO consider this recommendation resolved and closed as implemented.

Appendix V: GAO Contact and Staff Acknowledgements

GAO Contact

Triana McNeil at (202) 512-8777, McNeilT@gao.gov

Staff Acknowledgments

In addition to the contact named above, David Lutter (Assistant Director), Jeremy Manion (Analyst-in-Charge), Carla D. Brown, Jieun Chang, Pamela R. Davidson, Christine F. Davis, Gretta Goodwin, Darren A. Grant, Eric D. Hauswirth, Thomas M. James, Benjamin T. Licht, Gary Malavenda, Samuel J. Portnow, Pamela N. Snedden, and Adam Vogt made key contributions to this report.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through our website. Each weekday afternoon, GAO posts on its [website](#) newly released reports, testimony, and correspondence. You can also [subscribe](#) to GAO's email updates to receive notification of newly posted products.

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).
Subscribe to our [RSS Feeds](#) or [Email Updates](#). Listen to our [Podcasts](#).
Visit GAO on the web at <https://www.gao.gov>.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/fraudnet/fraudnet.htm>

Automated answering system: (800) 424-5454 or (202) 512-7700

Congressional Relations

Orice Williams Brown, Managing Director, WilliamsO@gao.gov, (202) 512-4400,
U.S. Government Accountability Office, 441 G Street NW, Room 7125,
Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800
U.S. Government Accountability Office, 441 G Street NW, Room 7149
Washington, DC 20548

Strategic Planning and External Liaison

Stephen J. Sanford, Acting Managing Director, spel@gao.gov, (202) 512-4707
U.S. Government Accountability Office, 441 G Street NW, Room 7814,
Washington, DC 20548

