



July 2021

COUNTERING VIOLENT EXTREMISM

DHS Can Further Enhance Its Strategic Planning and Data Governance Efforts



A Century of Non-Partisan Fact-Based Work

GAO@100 Highlights

Highlights of [GAO-21-507](#), a report to congressional requesters

Why GAO Did This Study

Data collected through the Extremist Crime Database show that there were 81 fatal violent extremist attacks in the United States from 2010 through 2020, resulting in 240 deaths. Since 2010, DHS has developed strategic initiatives that address targeted violence and terrorism prevention, which include efforts to counter violent extremism, among other things. GAO was asked to review DHS's longer-term efforts to prevent terrorism and targeted violence.

This report examines the extent to which (1) DHS's 2019 strategy to address targeted violence and terrorism prevention includes key elements of a comprehensive strategy, and (2) DHS has developed a data governance framework to help implement its strategy. GAO reviewed DHS documentation and compared DHS's strategy to identified elements of a comprehensive strategy, and compared DHS's efforts to develop a data governance framework to federal requirements for implementing data governance.

What GAO Recommends

GAO is making three recommendations, including that DHS revise its strategy to include all key elements of a comprehensive strategy, and incorporate its targeted violence and terrorism prevention mission into its departmental governance of data.

View [GAO-21-507](#). For more information, contact Triana McNeil at (202) 512-8777 or McNeilT@gao.gov.

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DHS Can Further Enhance Its Strategic Planning and Data Governance Efforts

What GAO Found

DHS's 2019 Strategic Framework for Countering Terrorism and Targeted Violence and the related plans—collectively referred to as the strategy—outline the department's vision for all DHS counterterrorism activities. In prior work, GAO has identified seven elements of a comprehensive strategy. GAO found that DHS's strategy contains some but not all of the key elements (see figure). For example, GAO found that DHS's strategy included a mission statement, and a set of goals that were in turn linked to objectives and priority actions. However, the strategy did not include a discussion of external factors such as how the economy, demographics, or emerging technologies may affect the department in meeting its goals. By identifying and assessing such external factors, DHS would be better positioned to proactively mitigate such factors or plan for contingencies, if needed.

Extent to Which DHS's Strategy for Countering Terrorism and Targeted Violence Included the Seven Elements of a Comprehensive Strategy

Elements of a comprehensive strategy	GAO assessment
Mission statement	●
Problem definition, scope, and methodology	◐
Goals and objectives	●
Activities, milestones, and performance measures	◐
Organizational roles, responsibilities, and coordination	◐
Resources and investments	○
Key external factors that could affect goals	○

Legend

● Fully included ◐ Partially included ○ Not included

Source: GAO analysis of DHS Strategic Framework for Countering Terrorism and Targeted Violence and the Framework's Public Action Plan and the Implementation Plan. | GAO-21-507

DHS has taken some steps to establish a data governance framework, which helps ensure that an agency's data assets are transparent, accessible, and of sufficient quality to support its mission. For example, DHS established a data governance council to manage various data priority areas, however it has not yet completed actions to include targeted violence and terrorism prevention data into its department-wide framework. DHS has already identified some data challenges, such as the lack of comprehensive, national-level statistics on terrorism and targeted violence that underscore the need for a data governance framework. By incorporating targeted violence and terrorism prevention data into its broader data governance framework, DHS would be better able to leverage data to support and inform its prevention efforts, including building effective policy to address the threats and trends it identifies in the data.

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Abbreviations

DHS	Department of Homeland Security
DOJ	Department of Justice
OMB	Office of Management and Budget

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July 20, 2021

The Honorable Gary C. Peters
Chairman
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. From 2010 through 2020, data from the Extremist Crime Database show that there were 240 deaths resulting from 81 violent extremist attacks in the United States.¹ Recent demonstrations and riots in cities across the country have presented extremists with additional opportunities to sow discord and commit violence, including the attack that occurred on the U.S. Capitol on January 6, 2021. According to the Secretary of Homeland Security, domestic violent extremism poses the most lethal and persistent terrorism-related threat to the homeland and must be treated as a national priority.²

In response to the threat of violent extremism, the Department of Homeland Security (DHS)—in partnership with the White House and other federal departments—has developed a series of initiatives and strategies since 2010 aimed at addressing the immediate prevention of

¹These data are reported as of May 2021 by the Extremist Crime Database. The 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 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, except for the recent addition of far-left extremists to the database.

²According to the Office of the Director of National Intelligence, a domestic violent extremist is an individual, based and operating primarily in the United States without direction or inspiration from a foreign terrorist group or other foreign power, who seeks to further political or social goals wholly or in part through unlawful acts of force or violence.

extremist attacks, and promoting actions that could reduce the likelihood that attacks are planned in the first place. These strategies have included a 2011 plan for preventing violent extremism, a revised plan in 2016, and most recently a new strategy in 2019 that revised its focus to include not only ideological attacks, but also other violent attacks not necessarily driven by an ideology, referred to as “targeted violence.”³ Activities under these strategies have included efforts to promote community awareness to better identify potential threats before they become imminent threats or to dissuade individuals from committing violent acts.

In 2017, we reviewed DHS and Department of Justice (DOJ) government-wide countering violent extremism strategic planning efforts, including their efforts associated with the 2011 and 2016 strategic implementation plans.⁴ Among other things, we found that the federal government did not have a cohesive strategy or process for assessing overall efforts for countering violent extremism. DHS and DOJ agreed with our recommendations that they work through an interagency task force to develop a cohesive strategy with measurable outcomes and establish a process to assess the overall progress of efforts to counter violent extremism. However, the interagency task force disbanded in 2017, and the departments have not developed an alternative method for developing a government-wide cohesive strategy. As a result, these recommendations have not been implemented.

In addition to the strategies, DHS implemented grant programs in 2016 and 2020 for \$10 million each. Grants under the first program supported efforts to counter violent extremism, while grants under the second

³In December 2011, the White House issued *The National Strategy for Empowering Local Partners to Prevent Violent Extremism in the United States, Strategic Implementation Plan*. The Strategic Implementation Plan was replaced by a new version in October 2016. For more information, see GAO, *Countering Violent Extremism: Actions Needed to Define Strategy and Assess Progress of Federal Efforts*, [GAO-17-300](#) (Washington, D.C.: Apr. 6, 2017). In September 2019, DHS issued its *Strategic Framework for Countering Terrorism and Targeted Violence*. DHS released associated public and internal implementation plans for the framework in 2020. We collectively refer to these as the strategy. The background of this report provides more detail on the strategy and related documentation.

⁴[GAO-17-300](#).

program supported efforts to prevent targeted violence and terrorism.⁵ In February 2021, we reported on DHS's 2016 Countering Violent Extremism Grant Program. DHS agreed with our recommendations that it could improve its grants management by documenting its rationale for grant-making decisions in future programs, and collecting data that would enable meaningful evaluation of individual grants and the overall grant program.⁶ These recommendations have not been fully addressed, as of May 2021. Separately, in February 2021, the Secretary of Homeland Security announced that state and local governments would be required to spend a combined total of at least \$77 million in preparedness grant funding to combat domestic violent extremism.

You asked us to explore DHS's longer-term efforts to prevent targeted violence and terrorism. This report examines the extent to which (1) DHS's 2019 strategy to address targeted violence and terrorism prevention includes key elements of a comprehensive strategy, and (2) DHS has developed a data governance structure to help implement its targeted violence and terrorism prevention strategy.

To determine the extent to which DHS's strategy includes the key elements of a comprehensive strategy to guide its counterterrorism and targeted violence efforts, we evaluated DHS's strategy and determined whether it included the elements applicable to a comprehensive strategy. We also reviewed DHS documentation of its policies and guidance, along with prior White House and DHS strategies and plans, and our work evaluating agencies' strategic plans to provide context and determine which criteria to apply to DHS's strategy. Specifically, in our prior work, we identified seven elements that are necessary for a strategy to be comprehensive, and we determined they were all applicable to DHS's strategy.⁷ Two of our analysts independently reviewed and evaluated DHS's strategy and the related implementation plan with the seven elements for a comprehensive strategy. We determined that the strategy and the supporting internal implementation plan "fully included" an

⁵DHS defines terrorism as a premeditated threat or act of violence, against persons, property, environmental, or economic targets, to induce fear or to intimidate, coerce or affect a government, the civilian population, or any segment thereof, in furtherance of political, social, ideological, or religious objectives. The background of this report provides information on DHS's transition from using the terms countering violent extremism to terrorism prevention.

⁶[GAO-21-216](#).

⁷GAO, *Defense Logistics: A Completed Comprehensive Strategy is Needed to Guide DOD's In-Transit Visibility Efforts*, [GAO-13-201](#) (Washington, D.C.: Feb. 28, 2013).

element if they described the entire element, and “partially included” an element if they described some, but not all, parts of that element. If the strategy and implementation plan did not explicitly cite any of the parts of an element, we determined that the element was “not included.”

To determine the extent to which DHS has implemented a data governance framework for its targeted violence and terrorism prevention data, we reviewed the Office of Management and Budget’s (OMB) Federal Data Strategy and its associated Federal Data Strategy 2020 Action Plan.⁸ We identified three key activities in the Federal Data Strategy 2020 Action Plan that applied to an agency’s data governance framework activities. We considered our prior work on data governance to determine which activities would apply to DHS’s targeted violence and terrorism prevention data.⁹ We also used criteria for establishing a common definition of targeted violence. Specifically, we reviewed the DHS Lexicon’s purpose statements—which is DHS’s unified controlled vocabulary that the department and its components use when communicating and sharing data—and OMB’s Federal Data Strategy.

Additionally, we reviewed DHS’s Data Governance Charter and its Evidence-Based Data Strategy to determine the department’s framework for data governance, and we reviewed DHS’s Strategic Framework for Countering Terrorism and Targeted Violence Implementation Plan to identify data challenges, plans, and milestones related to targeted violence and terrorism prevention data governance, including plans to add targeted violence to the DHS Lexicon. To provide context for understanding DHS’s activities with respect to defining key terms for homeland security activities, including terrorism-related definitions, we reviewed reports from the Homeland Security Advisory Council from 2010 through 2019.

We interviewed an official from DHS’s Office of the Chief Data Officer to obtain information on DHS’s progress in implementing both department-wide data governance and data governance for targeted violence and terrorism prevention. We also interviewed officials from the Office for Targeted Violence and Terrorism Prevention and the Science and

⁸OMB, Federal Data Strategy – A Framework for Consistency, OMB Memorandum M-19-18 (Washington, D.C.: 2019). Federal Data Strategy Development Team, President’s Management Agenda: Federal Data Strategy 2020 Action Plan (Washington, D.C.: December 2019).

⁹GAO, *Data Governance: Agencies Made Progress in Establishing Governance, but Need to Address Key Milestones*, [GAO-21-152](#) (Washington, D.C.: Dec. 16, 2020).

Technology Directorate to obtain their views on the data challenges facing the department in meeting its targeted violence and terrorism prevention mission, including data governance and establishing a common definition of targeted violence.

To provide contextual information on the number of domestic attacks and deaths associated with violent extremism or targeted violence from 2010 through 2020, we obtained information from the Extremist Crime Database, which is a joint project for collecting and reporting data on extremist-related violence.¹⁰ We reported on this 11-year period because it coincided with major activities associated with countering violent extremism and provided context to DHS's strategic activities. We assessed the reliability of the database through review of database documentation and an interview with the Extremist Crime Database principal investigators. 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 and year. Appendix I contains a more detailed discussion of our scope and methodology.

We conducted this performance audit from September 2020 to July 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

¹⁰The 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 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. Celinet Duran was the principal investigator for the far-left extremist attack and deaths data. 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.

Background

Violent Extremism in the United States

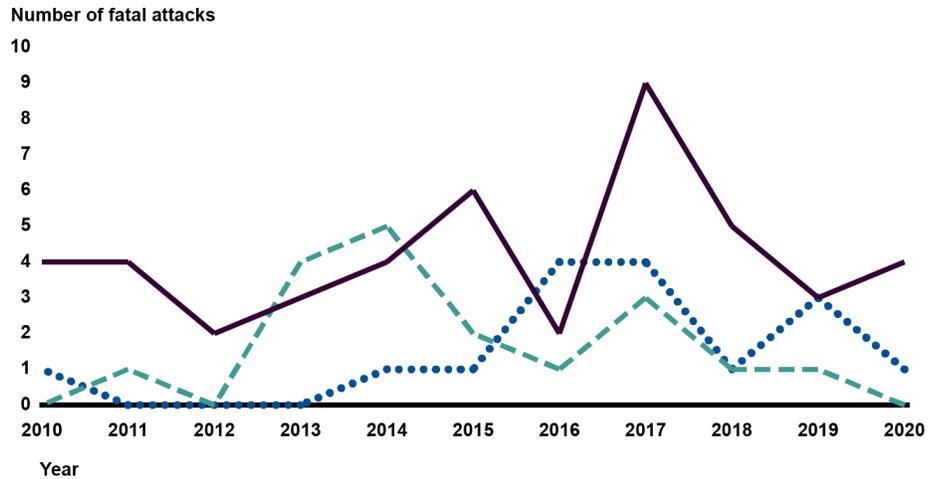
Domestic violent extremists, such as white supremacists, anti-government extremists, radical Islamist extremists, and other ideologically-inspired domestic violent extremists have been active in the United States for decades. Violent extremist attacks resulting in deaths generally originated from two broad groups: far-right extremists and radical Islamist extremists.¹¹ Since 2010, the single highest-casualty ideological attack occurred in 2016 by an Islamic extremist, killing 49 people at an Orlando nightclub. Since that time, however, there has been a general rise in far-right extremist-related deaths. Far-left extremist-related deaths have generally remained lower than from Islamist and far-right extremist-related deaths during this time period, with the highest number of deaths at 10 in 2016.¹² See figure 1 below.

¹¹Radical 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 right extremists groups may exhibit fiercely nationalistic, anti-global, xenophobic or white supremacist views and include Neo-Nazis, the Atomwaffen Division, and some members of the sovereign citizens' movement, among others. Far left extremist groups include Moorish sovereign citizens, which have black nationalist views. Far-left extremists also include those with extreme views on animal rights, the environment, and extreme egalitarianism.

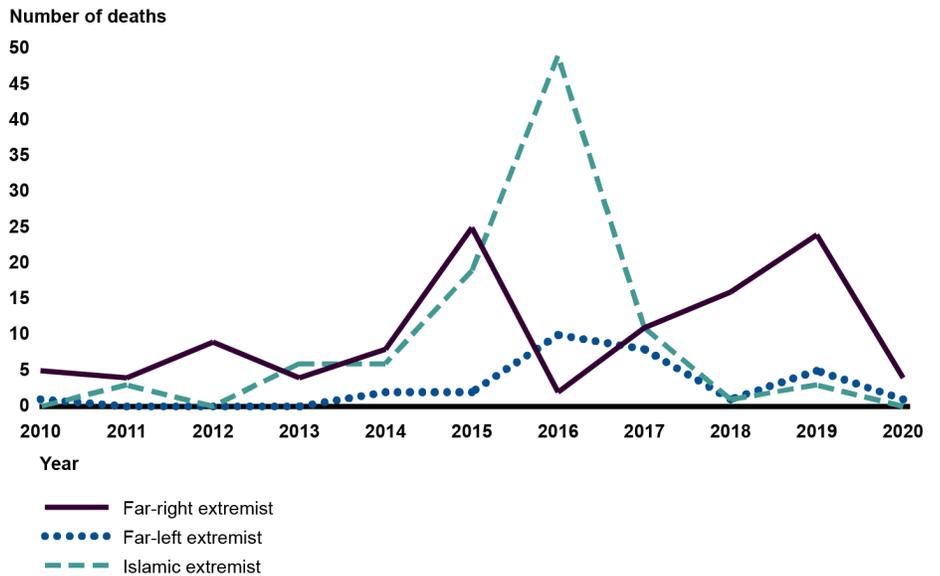
¹²DHS Office for Targeted Violence and Terrorism Prevention officials told us that they do not use or distinguish between far right and far left extremism, but they categorize both as violent extremism. However, they said it is not incorrect or uncommon for experts to make these distinctions in the data.

Figure 1: Number of Fatal Attacks and Deaths from Violent Extremist Activities in the United States from 2010 through 2020

Number of fatal attacks conducted by violent extremists in the U.S., 2010-2020



Number of deaths associated with violent extremist attacks in the U.S., 2010- 2020



Source: GAO analysis of the Extremist Crime Database. | GAO-21-507

Note: The Information presented above, including the ideological motivation of the attacks, are from the Extremist Crime Database, and not determinations of the Department of Homeland Security (DHS). The Extremist Crime Database was a part of the DHS Emeritus Center of Excellence National Consortium for the Study of Terrorism and Responses to Terrorism. The focus of this database is to identify extremist-related crime and the extent to which extremism played a role in the crime. As of 2019, the database is independently managed by the Extremist Crime Database Research Team and not affiliated with DHS, but generally uses the same methodology and is managed by the same principal researchers as when it was receiving funding from DHS. DHS 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. The information presented above excludes attacks that were ranked in the Extremist Crime Database as having little or no perceived tie to ideological motivation of the perpetrator, such as anti-government, radical Islamist, or white supremacy sentiments.

Federal Strategies and Initiatives to Counter Violent Extremism

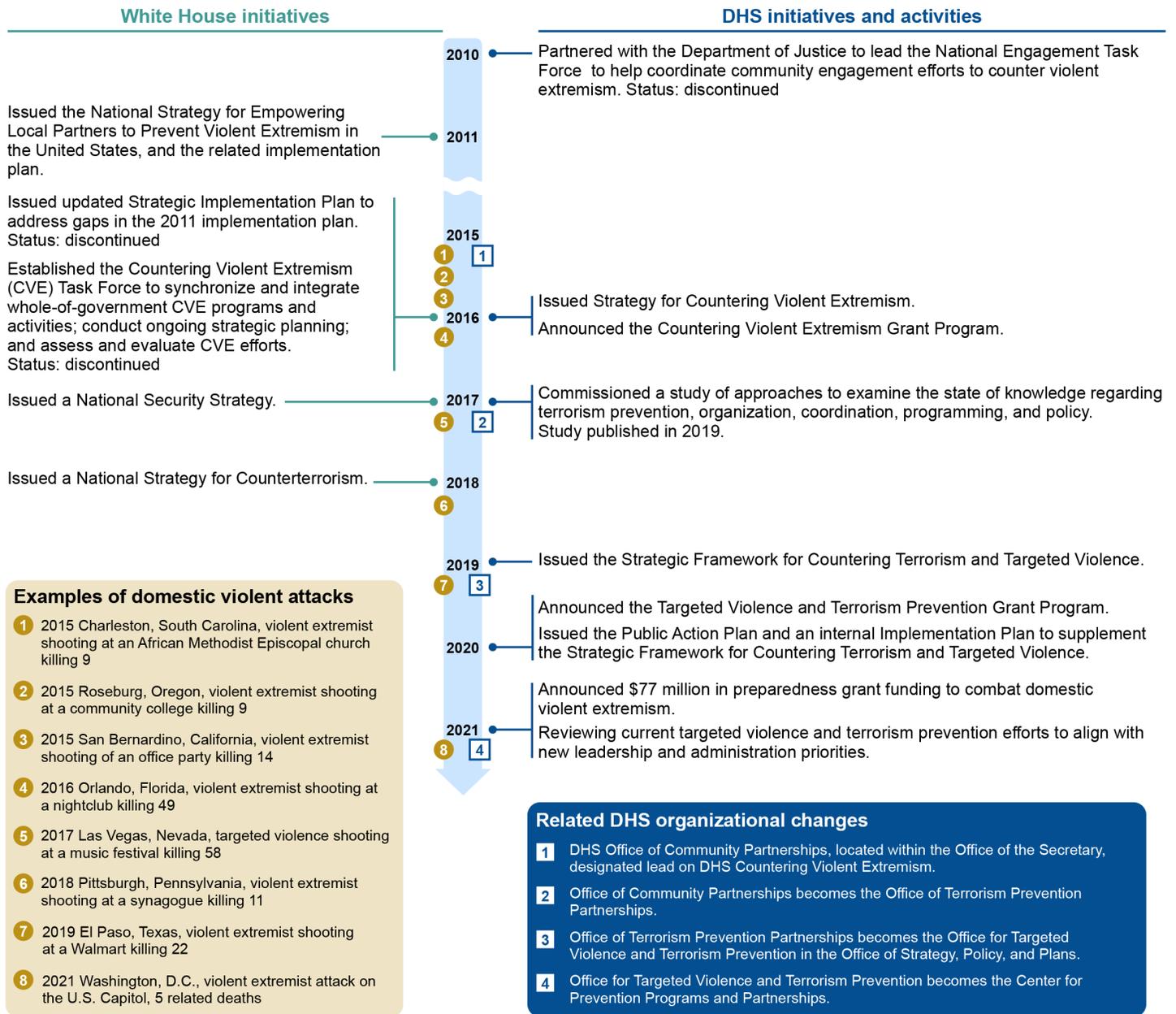
Since 2010, the White House, DHS, and DOJ have initiated national level efforts intended to counter violent extremism. In 2010, DHS collaborated with DOJ and its component, the FBI, to help lead the National Engagement Task Force to coordinate community engagement efforts to counter violent extremism. The effort involved representatives from a broad range of federal departments and agencies, and, among other things, identified best practices for countering violent extremism.¹³

The White House subsequently developed a national strategy for countering violent extremism in 2011, updated it in 2016, and developed additional national security-related strategies that included references to countering violent extremism. At the department level, DHS developed a strategy for countering violent extremism in 2016, and replaced it in 2019 with a strategy for preventing targeted violence and terrorism. According to DHS, it broadened the terrorism prevention concept to include targeted violence in 2019 to recognize and address a broader range of current and emerging threats among communities.

Figure 2 below shows the various strategies and initiatives that the White House and DHS have initiated since 2010; key DHS organizational changes related to efforts to address violent extremism; and examples of domestic violent extremism and targeted violence, which we label as domestic violent attacks, that occurred from 2010 through January 6, 2021.

¹³The National Engagement Task Force was discontinued in 2013.

Figure 2: White House and DHS Initiatives and Activities to Address Targeted Violence and Violent Extremism



Source: Analysis of information from the White House, DHS, the Extremist Crime Database and relevant literature. | GAO-21-507

Note: The examples of domestic violent attacks include (1) the most deadly violent extremist attacks identified in the Extremist Crime Database, (2) one DHS-designated targeted violence shooting attack in 2017, and (3) the violent extremist attack on the U.S. Capitol in 2021 that resulted in deaths, as identified by the FBI. The focus of the Extremist Crime Database is to identify extremist-related crime and the extent to which extremism played a role in the crime. The database was part of the DHS

Emeritus Center of Excellence National Consortium for the Study of Terrorism and Responses to Terrorism. As of fall 2019, the database has been independently managed by the Extremist Crime Database Research Team and not affiliated with DHS, but uses the same methodology and is managed by the same principal researchers as when it was receiving funding from DHS. To limit the number of examples of extremist attacks, we included attacks that resulted in more than eight deaths, except in the case of the U.S. Capitol attack, which had five related deaths but was included because of its national significance. On May 11, 2021, DHS redesignated the Office for Targeted Violence and Terrorism Prevention with the Center for Prevention Programs and Partnerships.

Transition to Targeted Violence and Terrorism Prevention

Countering violent extremism

Proactive actions to counter efforts by extremists to radicalize, recruit, and mobilize followers to violence.

Terrorism prevention

Proactive actions ensuring that all segments of society: 1) understand the terrorism threat, 2) have developed activities to address risk factors and build protective non-law enforcement measures against engaging in terrorism, 3) have well-developed bystander referral networks, and 4) have a rich and diverse set of social service and other programs to help individuals move away from violence. The goal of terrorism prevention is to stop or off-ramp an act of violence before it becomes a law enforcement issue. Previously, such activities were referred to as “countering violent extremism.”

Targeted violence and terrorism prevention

Targeted violence includes attacks that lack political, ideological, or religious motivation, but still render casualties and property destruction similar to terrorist attacks. Examples can include attacks on schools and public spaces. Targeted violence and terrorism prevention concepts are melded into one descriptor as both are often interrelated.

Source: GAO analysis of Department of Homeland Security documents. | GAO-21-507

Until 2015, no one DHS component had primary responsibility for leading the department’s effort to counter violent extremism. In 2015, DHS established the Office of Community Partnerships to consolidate, coordinate, and focus the department’s efforts to counter violent extremism; and to support the efforts of state, local and private entities, such as through grants. In 2017, DHS began using the term “terrorism prevention” in place of “countering violent extremism.” According to DHS, in 2019, it expanded its terrorism prevention focus to include related efforts to prevent targeted violence (see sidebar). DHS also redesignated the Office of Terrorism Prevention Partnerships as the Office for Targeted Violence and Terrorism Prevention, which assumed the responsibilities of its predecessor office.

The Office for Targeted Violence and Terrorism Prevention and its predecessor offices’ operating budgets averaged \$3 million for each of the fiscal years 2016 through 2020. The Office’s fiscal year 2021 operating budget of \$16.5 million, plus \$20 million for targeted violence and terrorism prevention grants, represents a greater commitment of resources to the prevention effort to include an expansion in headquarters and field office staffing.

DHS Entities' Roles and Responsibilities for Targeted Violence and Terrorism Prevention

The Office of Counterterrorism and Threat Prevention Policy—within DHS's Office of Strategy, Policy, and Plans—leads and integrates department-wide efforts to develop, coordinate, and implement policies, plans, and strategies to support DHS's mission to 1) counter terrorism and mitigate emerging threats, 2) execute its enforcement mission, and 3) conduct screening and vetting. Within this lead office, the Office for Targeted Violence and Terrorism Prevention is responsible for executing programs and coordinating efforts within the department to counter terrorism and emerging terrorist threats, including managing grants, conducting community and law enforcement awareness briefings and threat assessments, and coordinating information sharing. While this office has the primary responsibility for leading and coordinating the department's terrorism and targeted violence efforts, at least 21 other DHS offices have a role in targeted violence and terrorism prevention-related activities.¹⁴

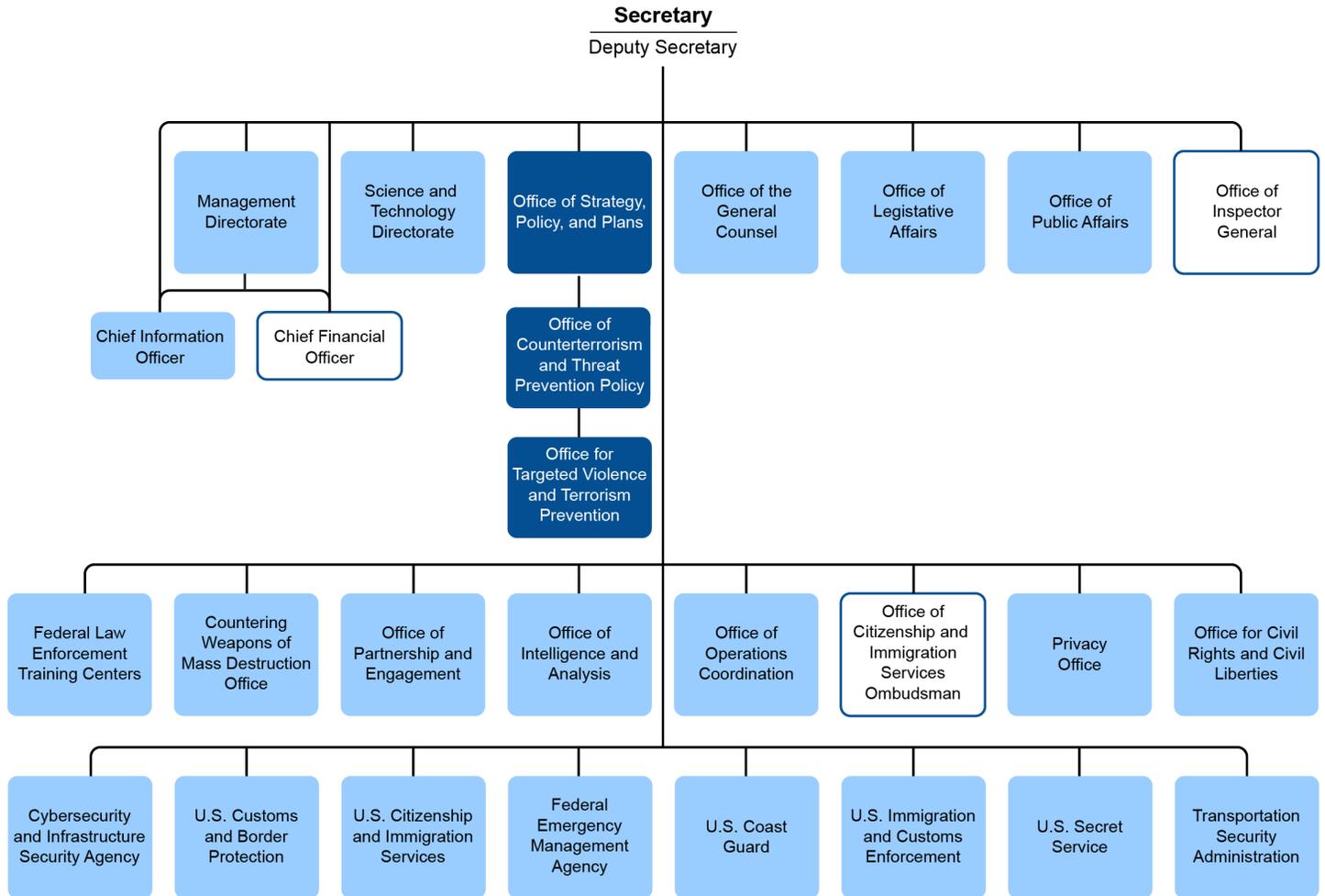
On May 11, 2021, DHS redesignated the Office for Targeted Violence and Terrorism Prevention as the Center for Prevention Programs and Partnerships. According to DHS, the new center coordinates and builds upon the broad range of violent extremism prevention activities that are currently undertaken across DHS, including grants, community and law enforcement awareness briefings, threat assessments, and information sharing. However, it is too early to tell in what ways this office will be the same as or different from the Office for Targeted Violence and Terrorism Prevention. We refer to the Office for Targeted Violence and Terrorism Prevention throughout this report as that was the office in place at the time of our audit work and from which we obtained information.

Figure 3 below shows the DHS components and offices with roles in addressing targeted violence and terrorism prevention before May 11, 2021.

¹⁴In addition to DHS, multiple partners and stakeholders are involved in addressing targeted violence and terrorism prevention, including federal agencies such as DOJ and the Department of State; state, local, and tribal governments; nongovernmental organizations; academic institutions; and others in the private sector.

Figure 3: Department of Homeland Security (DHS) Components and Offices with a Role Implementing Targeted Violence and Terrorism Prevention Activities Prior to May 11, 2021

U.S. Department of Homeland Security



- Offices with no designated roles or responsibilities for targeted violence and terrorism prevention
- Targeted violence and terrorism prevention mission related roles and responsibilities
- Offices with primary responsibility for addressing targeted violence and terrorism prevention

Source: GAO analysis of DHS documents. | GAO-21-507

Note: On May 11, 2021, DHS redesignated the Office for Targeted Violence and Terrorism Prevention as the Center for Prevention Programs and Partnerships.

Current DHS Targeted Violence and Terrorism Prevention Strategic Efforts

DHS's Strategic Framework For Countering Terrorism and Targeted Violence Goals

Goal 1: Understanding the evolving terrorism and targeted violence threat environment, and support partners in the homeland security enterprise through this specialized knowledge.

Goal 2: Prevent terrorists and other hostile actors from entering the United States, and deny them the opportunity to exploit the Nation's trade, immigration, and domestic and international travel systems.

Goal 3: Prevent terrorism and targeted violence.

Goal 4: Enhance U.S. infrastructure protections and community preparedness.

Source: Department of Homeland Security Strategic Framework for Countering Terrorism and Targeted Violence. | GAO-21-507

As described earlier, DHS developed a strategic framework for Targeted Violence and Terrorism Prevention, which consists of three components described below. Unless otherwise specified, we refer to all of these collectively as the strategy.

- **The Strategic Framework:** Released in 2019, the Strategic Framework for Countering Terrorism and Targeted Violence outlines the department's vision for all DHS counterterrorism activities, including for the first time a terrorism and targeted violence prevention goal, objectives and general priority actions for each objective.¹⁵ The terrorism and targeted violence prevention goal is the third of DHS's 4-goal strategy (see sidebar), and is to be primarily addressed by the Office for Targeted Violence and Terrorism Prevention.¹⁶
- **Publicly available implementation plan:** Released in September 2020, DHS's Public Action Plan is intended to outline how DHS will be accountable to the public for meeting its goals and objectives, including providing annual assessments to congressional oversight committees. The plan also highlights select priority actions and anticipated completion dates for these actions.
- **Internal implementation plan:** Developed in October 2020, this document is intended to guide components' and offices' efforts in implementing the strategy.¹⁷ The plan outlines the milestones for specific actions under each priority action and objective identified in the strategy. It also identifies which offices are responsible for these actions, designating a lead and supporting offices for each activity.

Elements of a Comprehensive Strategy

A comprehensive strategy provides the foundation upon which an agency builds its plan for defining what the agency intends to accomplish and provides a roadmap for how it will achieve desired results and meet its goals and objectives. In our prior work, we identified seven key elements that are necessary for a strategy to be comprehensive. We did so by reviewing statutory requirements for agency strategic plans under the

¹⁵The countering violent extremism effort, now termed terrorism prevention and addressed under the larger framework of targeted violence and terrorism prevention, previously had its own strategy. The current strategy addresses terrorism prevention and targeted violence under goal 3 and to a limited extent, goal 1.

¹⁶The Office for Targeted Violence and Terrorism Prevention also has some limited responsibility under goal 1, specifically to develop a definition of targeted violence.

¹⁷The internal implementation plan is for DHS components and offices to use for internal purposes only and was not released to the public.

Government Performance and Results Act of 1993 and applying the seven key elements of a comprehensive strategy we identified in assessing other agency strategies.¹⁸ The following is a list of the seven key elements:

1. a comprehensive mission statement;
2. a discussion of the problem to be addressed with the strategy and the scope and methodology;
3. goals and objectives that address overall results desired;
4. activities, milestones, and performance measures to determine outcomes;
5. resources and investments needed to execute the strategy;
6. organizational roles, responsibilities, and coordination required to manage and oversee implementing the strategy; and
7. key external factors beyond the control of the organization that could affect meeting the strategy's goals.

Data Governance Framework

Data governance is the framework or structure for ensuring that an agency's data assets are transparent, accessible, and of sufficient quality to support its mission; improve the efficiency and effectiveness of agency operations; and provide useful information to the public. In our prior work, we reported that key practices for data governance include developing and approving data standards; managing, controlling, monitoring, and enforcing consistent application of data standards; making decisions about changes to existing data standards; and resolving conflicts related to the application of data standards.¹⁹ Implementing an effective data governance framework requires participation and commitment from agency staff and officials that generate, analyze, and use the data to make decisions.

In June 2019, the Office of Management and Budget (OMB) released the Federal Data Strategy, which established a set of principles and best

¹⁸See, for example, GAO, *Managing for Results: Critical Issues for Improving Federal Agencies' Strategic Plans*, [GAO/GGD-97-180](#) (Washington, D.C.: Sept. 16, 1997); and GAO, *Defense Logistics: A Completed Comprehensive Strategy is Needed to Guide DOD's In-Transit Visibility Efforts*, [GAO-13-201](#) (Washington, D.C.: Feb. 28, 2013).

¹⁹GAO, *Data Act: OMB Needs to Formalize Data Governance for Reporting Federal Spending*, [GAO-19-284](#) (Washington, D.C.: Mar. 22, 2019).

practices to help agencies leverage data as a strategic asset by supporting strong data governance.²⁰ The Federal Data Strategy states that such a structure helps agencies use data to answer important questions, which should be driven by user needs. To further aid agencies in implementing data governance, the Federal Data Strategy team released the Federal Data Strategy 2020 Action Plan (2020 Action Plan).²¹ The 2020 Action Plan includes a set of 20 concrete and measurable actions that agencies are either required or encouraged to take during their first year of implementing the Federal Data Strategy. We previously reported that of the 20 actions, three related to establishing data governance. These are (1) constituting a diverse data governance body, (2) assessing data and related infrastructure maturity, and (3) identifying opportunities to increase staff's data skills.²² According to DHS, while data governance is a shared responsibility throughout the department, in 2019, DHS established the position of Chief Data Officer to work with components and offices to implement data governance across the department.

DHS's Strategy for Countering Terrorism and Targeted Violence Lacks Some Key Elements of a Comprehensive Strategy

DHS's 2019 Strategy for Countering Terrorism and Targeted Violence and the related plans contain some but not all key elements of a comprehensive strategy. In our prior work, we have identified seven elements of a comprehensive strategy, which include a mission statement; goals and objectives; and organizational roles, responsibilities, and coordination; among other elements.²³ Our analysis found that the strategy and related plans fully include two of the seven elements of a comprehensive strategy, partially include three others, and do not include the remaining two. Table 1 describes the seven key elements of a comprehensive strategy, and shows the results of our assessment on the extent to which DHS's 2019 strategy included them.

²⁰OMB, Federal Data Strategy – A Framework for Consistency, OMB Memorandum M-19-18 (Washington, D.C.: 2019).

²¹Federal Data Strategy Development Team, President's Management Agenda: Federal Data Strategy 2020 Action Plan (Washington, D.C.: December 2019).

²²GAO, *Data Governance: Agencies Made Progress in Establishing Governance, but Need to Address Key Milestones*, [GAO-21-152](#) (Washington, D.C.: Dec. 16, 2020). For more information on these steps, see the objective in this report related to data governance.

²³See, for example, GAO, *Defense Logistics: A Completed Comprehensive Strategy Is Needed to Guide DOD's In-Transit Visibility Efforts*, [GAO-13-201](#) (Washington, D.C.: Feb. 28, 2013).

Table 1: Extent To Which the Department of Homeland Security’s (DHS) Strategy for Countering Terrorism and Targeted Violence Included the Key Elements of a Comprehensive Strategy

Elements of a Comprehensive Strategy	Description of Elements	DHS Strategy Status	GAO’s Assessment ^a
Mission statement	A comprehensive statement that summarizes the main purpose of the strategy.	The strategy discusses its overall purpose, and includes a mission statement.	●
Problem definition, scope, and methodology	Presentation of the issues to be addressed by the strategy, its scope, and the process by which it was developed.	The strategy describes its purpose and scope but does not clearly document the methodology used to develop the goals, objectives, and priority actions.	◐
Goals and objectives	The identification of the goals to be achieved by the strategy and linked objectives to meet the goals.	The strategy contains four goals. Each goal is linked to a set of objectives that are, in turn, linked to a set of priority actions.	●
Activities, milestones, and performance measures	The identification of measureable outcomes through steps to achieve results, as well as milestones and performance measures to gauge results.	The strategy identifies activities, and the implementation plan identifies over 500 milestones. However, it does not provide performance measures needed to determine whether it is a success, or provide methods for determining whether DHS is on the right track for meeting desired outcomes.	◐
Organizational roles, responsibilities, and coordination	A description of roles and responsibilities for managing and overseeing implementation of the strategy and the establishment of mechanisms for multiple stakeholders to coordinate their efforts throughout implementation and to make necessary adjustments to the strategy based on performance.	The strategy’s implementation plan identifies the DHS offices’ roles and responsibilities, but there is limited discussion about what they should coordinate on, how they are to coordinate, or how often they should coordinate.	◐
Resources and investments	Costs to execute the plan and the sources and types of resources and investments, including skills and technology, and the human, capital, information, and other resources required to meet the goals/objectives.	The strategy does not identify the types of resources or investments needed to execute the strategy. It does not describe DHS’s current or planned use of risk management to prioritize and allocate resources, including maximizing its use of grant funds through risk-based investments. Additionally, DHS lacks comprehensive budgetary information for targeted violence and terrorism prevention activities across the department.	○

Key external factors that could affect goals	Key factors external to the organization and beyond its control that could significantly affect the achievement of the long-term goals contained in the strategy. These can include economic, demographic, social, technological, or environmental factors, as well as conditions or events that could affect the organization's ability to achieve the desired results.	The strategy does not systematically identify the external factors that could affect reaching each goal.	○
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- Legend:
- Fully included
 - ◐ Partially included
 - Not included

Source: GAO analysis of DHS Strategic Framework for Countering Terrorism and Targeted Violence and the Framework's Public Action Plan and Implementation Plan. | GAO-21-507

^aWe determined that the strategy and plans "fully included" an element if they described the entire element, and "partially included" an element if they described some, but not all, parts of that element. If they did not explicitly cite any of the parts of an element, we determined that the element was "not included" in the strategy.

Based on our analysis of DHS's strategy, we determined that it fully includes a discussion of its main purpose, along with the strategy's goals and linked objectives to meet the goals. However, the strategy does not fully include other elements of a comprehensive strategy. For example, it does not include information about the resources and investments that would be required to achieve the goals in the strategy, or include key external factors—factors outside of the agency and beyond its control—that could affect the achievement of the goals.

We have previously reported that it is important to identify needed resources and investments—which may include skills and technology, human, capital, information, and other resources required to meet a strategy's goals and objectives.²⁴ However, DHS cannot identify all targeted violence and terrorism prevention activities across the department because it does not have a department-wide definition of targeted violence. As a result, DHS does not have information on needed investments across the departments for these activities that align with agency-wide targeted violence and terrorism prevention goals and priorities.

When we asked DHS for a breakdown of its budget and resources for supporting its targeted violence and terrorism prevention mission, DHS initially stated that to maintain accountability, transparency, and visibility

²⁴[GAO-13-201](#).

of targeted violence and terrorism prevention-related budget items, its Office of Policy established dedicated financial codes for terrorism prevention and targeted violence salaries and expenses. DHS later stated that it did not have the capability to determine how it is expending resources by each of the strategy's goals, but did not provide a reason for why that was the case.

In our prior work we reported that it is important to identify key external factors that might affect a comprehensive strategic plan so that a mitigation plan can be developed.²⁵ Specifically, we found that it is important to identify factors external to the organization and beyond its control that could significantly affect the achievement of the long-term goals contained in the strategy. These external factors can include economic, demographic, social, technological, or environmental factors, as well as conditions or events that would affect an agency's ability to achieve the desired results.

DHS's strategy does not discuss the key external factors—factors outside of the agency and beyond its control—that could affect the achievement of the goals related to targeted violence and terrorism prevention. DHS officials stated that it was an oversight and that they were focused on other factors of the strategy instead of analyzing the external factors because they did not know their strategy should include an analysis of external factors. For example, the implementation plan directly addresses the emerging challenges of the global pandemic in the introduction, speaking to the impact the pandemic could have on delivery timelines, according to DHS. However, the strategy and its related plans do not include a dedicated discussion of this or other external factors, such as considering how new and emerging technologies might affect the threat environment or including an analysis of how such factors might affect the goals or how the department might mitigate them. As a living document, the implementation plan can be updated to address other factors as they emerge in the DHS operating environment. By identifying and assessing such external factors, DHS would have a more realistic understanding of the risks posed by external factors and would be better positioned to mitigate such risks.

According to DHS officials, in developing the strategy, the department made a conscious decision to make the document as accessible as possible to the public. As a result, DHS officials stated that they kept the

²⁵[GAO-13-201](#).

strategy short and minimized information that readers outside DHS would find unfamiliar and unnecessary. In addition, DHS officials stated that the strategy omits tactical details required for its implementation because of sensitivity concerns in releasing these details to the public. However, DHS's internal implementation plan, which DHS did not release to the public, also does not have all elements of a comprehensive strategy even though it is intended to guide the actions of all components and offices with a role implementing the strategy.

According to DHS officials, at the time of our review, DHS was assessing the strategy's implementation and its contents, and recent changes in DHS leadership and policy resulting from a new presidential administration. DHS did not identify a timeframe for when it anticipates completing its assessment. By revising or supplementing its current strategy to include all key elements of a comprehensive strategy—or by including all of these elements in any new strategy DHS might develop—DHS would be better positioned to make informed decisions about targeted violence and terrorism prevention efforts, including setting priorities, allocating resources, and identifying program improvements when needed. Such a comprehensive strategy would also help guide DHS's efforts to respond and adapt to the evolving challenges of preventing targeted violence and terrorism.

DHS's Data
Governance
Framework Does Not
Fully Address
Targeted Violence
and Terrorism
Prevention, and
Lacks a Definition for
Targeted Violence

Data Governance Framework Does Not Fully Address Data Needs Related to Targeted Violence and Terrorism Prevention

DHS has taken some steps to establish a department-wide data governance framework. However, the department has not determined how its new governance framework will fully address targeted violence and terrorism prevention. According to OMB's Federal Data Strategy, agencies should prioritize data governance to help enable them to fully leverage data in support of their missions.²⁶ Further, the 2020 Action Plan identified three actions for agencies to take that relate to establishing data governance.²⁷ Specifically, the 2020 Action Plan directs agencies to

- constitute a diverse data governance body,
- assess data and related infrastructure maturity,²⁸ and
- identify opportunities to increase staff data skills.²⁹

Further, the Federal Data Strategy calls for agencies to create and implement data standards, such as defining key terms, within relevant communities of interest to maximize data quality and facilitate use, access, sharing, and interoperability.³⁰

According to an official from the DHS Office of the Chief Data Officer, the department created the DHS Data Governance Council in December 2020 to develop guidance, policies, standards, and investment recommendations for managing and using data across the department. As of March 2021, the council had identified its initial structure for governing data across its mission, identifying seven priority areas including immigration, emergency preparedness, cybersecurity, law enforcement, management, biometric information, and screening. DHS also established a data governance council charter and an evidence-

²⁶OMB Memorandum M-19-18.

²⁷Federal Data Strategy Development Team, President's Management Agenda: Federal Data Strategy 2020 Action Plan (Washington, D.C.: December 2019). We previously made this observation in GAO, *Data Governance: Agencies Made Progress in Establishing Governance, but Need to Address Key Milestones*, [GAO-21-152](#) (Washington, D.C.: Dec. 16, 2020).

²⁸A data maturity assessment analyzes all aspects of agency policies, procedures, and operations related to data and data infrastructure, including data governance, data management, data culture, data systems and tools, data analytics, staff skills and capacity, resource capacity, and compliance with law and policy.

²⁹Data skills refer to staff's capability to identify and use data to inform an agency of its priorities to support evidence-building activities in its programs.

³⁰OMB Memorandum M-19-18.

based data strategy that further developed data management policies and provides guidance to agencies for sharing information and conforming to data standards, among other things. DHS's Acting Chief Data Officer laid out initial steps for assessing the maturity of the department's data for these priority areas. Further, the official outlined in the Evidence-Based Data Strategy DHS's commitment to a learning agenda to increase data skills and promote a data-driven culture of continuous and collaborative learning with and about data through ongoing investment in data infrastructure and human resources.

During the course of our audit, DHS took initial steps to incorporate targeted violence and terrorism prevention into its overarching data governance framework. For example, in April 2021, an official from the Office of the Chief Data Officer told us that DHS's data governance council might make targeted violence and terrorism prevention data its own priority area, or it might include some targeted violence and terrorism prevention data in other priority areas, such as law enforcement. However, in June 2021, this official stated that targeted violence and terrorism prevention is now formally a part of the intelligence and the law enforcement priority areas as well as other master Data Management Programs that align with the mission of DHS.

An official from the Office of the Chief Data Officer stated that, due to DHS's breadth of missions, there are a number of additional steps that the department would need to conduct to begin incorporating targeted violence and terrorism prevention data into its framework. For instance,

Challenges that Could Be Addressed with a Data Governance Framework

DHS identified various gaps in information it needs to fill to successfully achieve its targeted violence and terrorism prevention objectives. It also identified challenges that underscore the need for a data governance framework in the Strategic Framework for Countering Terrorism and Targeted Violence Strategic Implementation Plan. Below are three examples:

1. There are no comprehensive, national-level statistics on terrorism and targeted violence, though DHS stated it needed this information to make informed decisions regarding its prevention efforts.
2. DHS does not have a database of information, or a standardized approach to how it shares information on the latest threat trends and intervention research.
3. Gaps exist in DHS's knowledge of recidivism among current and former incarcerated individuals convicted of terrorism and targeted violence-related offenses. DHS plans to support research seeking to address major questions related to recidivism reduction, risk assessments, and the impact of incarceration on the spread of violent extremist ideologies.

Source: GAO analysis of Department of Homeland Security Strategic Framework for Countering Terrorism and Targeted Violence Strategic Implementation Plan. | GAO 21 507

- While DHS has established roles and responsibilities for the broader data governance council, DHS has not yet fully established data governance leadership and policies associated with targeted violence and terrorism prevention.
- In addition, DHS lacks an inventory of targeted violence and terrorism prevention-related data assets needed by the department to fill data gaps, such as the ones identified in three examples in the sidebar on the left, among other things. Without a data inventory, DHS cannot conduct a maturity assessment for its targeted violence and terrorism prevention efforts.
- In addition, DHS has not yet identified opportunities to increase staff data skills for targeted violence and terrorism prevention because it is not yet in a position to identify all the data needed to conduct targeted violence and terrorism prevention programs and activities.

DHS officials stated that the Office for Targeted Violence and Terrorism Prevention is working with the DHS Science and Technology Directorate and plans to assemble expert groups of stakeholders, operational subject matter experts, and academic experts to identify information they need for targeted violence and terrorism prevention and with whom they need to share it. These are important steps in the right direction. Targeted violence and terrorism prevention is an effort that relies on strong data and, as noted in its strategy, DHS currently faces data-related challenges. Incorporating targeted violence and terrorism prevention-related data into DHS's broader data governance framework, along with other efforts such as conducting a maturity assessment and identifying opportunities for officials to increase data skills would help create the organizational infrastructure needed for DHS to leverage data to support and inform its targeted violence and terrorism prevention efforts, including building effective policy to address threats and trends it identifies in the data.

DHS Lacks a Common Terminology for Targeted Violence

As described earlier, targeted violence and terrorism prevention efforts include the involvement of entities across the federal government, as well as state, local and tribal entities and the private sector. However, DHS lacks a common definition of targeted violence to manage its related programs and activities across the enterprise and with its partners and stakeholders.

In the strategy, DHS committed to introducing targeted violence into the DHS Lexicon, a unified controlled vocabulary that DHS and its components use when communicating and sharing data within DHS and among its federal, state, and local partners. By providing a common

definition for the terms used every day, the Lexicon reduces the possibility of misunderstandings when communicating across the Department and helps DHS to develop and manage knowledge, information, and data.

A leading data governance practice identified in the Federal Data Strategy is to adopt or adapt, create as needed, and implement data standards within relevant communities of interest to maximize data quality and facilitate use, access, sharing, and interoperability. We have previously reported that it is important for organizations to have complete, accurate, and consistent data to inform policy, document performance, and support decision-making.³¹ We have also previously highlighted the need for collaborating agencies to agree on common terminology and definitions to enable a cohesive working relationship among agencies.³²

The need to develop common terminology is a long-standing challenge for DHS. Several Homeland Security Advisory Council reports from 2010 through 2019 highlighted the need to develop common terminology across the homeland security enterprise.³³ For example, according to a 2019 Homeland Security Advisory Council report, terms and definitions for domestic violent extremism, domestic terrorism, and terrorist activity lack the level of clarity necessary for all stakeholders to act from a common basis of understanding.³⁴ According to a DHS Science and Technology Directorate official we interviewed, the term “targeted violence and terrorism prevention” means many things to practitioners and potential stakeholders, and these are not always aligned. According to the strategy, the department generally uses the term targeted violence to refer to any incident of violence that implicates homeland security

³¹GAO, *Humanitarian and Development Assistance: Project Evaluations and Better Information Sharing Needed to Manage the Military’s Efforts*, [GAO-12-359](#) (Washington, D.C.: Feb. 8, 2012) and GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#) (Washington, D.C.: June 1996).

³²[GAO-12-1022](#).

³³The Homeland Security Advisory Council provides organizational advice and recommendations to the Secretary of Homeland Security, including on the creation and implementation of policies, and conducts research and provides policy analysis on a variety of security issues.

³⁴In November 2020, DHS and the FBI jointly developed definitions for “domestic terrorism” and domestic violent extremism” in response to a statutory requirement in the National Defense Authorization Act for Fiscal Year 2020. See Pub. L. No. 116-92, div. E, tit. LVI §5602(a)(1)(A), 133 Stat. 1198, 2154 (2019). See [Domestic Terrorism: Definitions, Terminology, and Methodology](#).

and/or DHS activities in which a known or knowable attacker selects a particular target prior to the violent attack. Unlike terrorism, targeted violence includes attacks that lack a clearly discernible political, ideological, or religious motivation. However, the strategy states that this use of the term is unduly broad, and it indicates that it does not help the agency or stakeholders have a common understanding of the threat posed by targeted violence.

DHS has recognized the importance of developing and implementing a common terminology, and set it as one of the strategy's priority actions to create a new definition of targeted violence. The strategy stated that the new definition would be completed by the end of 2020, and that the Office for Targeted Violence and Terrorism Prevention would also develop a plan to socialize the approved definition within DHS, other federal agencies, and with state, local, tribal, and territorial government partners by that time. Further by the end of fiscal year 2021, the Office for Targeted Violence and Terrorism Prevention would assess the new definition.

However, as of April 2021, a definition had not been approved for use, delaying the department's process for promoting the newly scoped terminology. Officials from the Office of Policy stated that they do not know when it will be approved. According to the Office for Targeted Violence and Terrorism Prevention officials, the process for crafting the definition has involved consulting with many outside stakeholders, including the FBI, local law enforcement, academia, and nongovernmental organizations, and has taken more time than they expected. According to DHS officials, the department has also been hampered by its need to prioritize the response to the global pandemic. Further, DHS officials told us that the new administration is taking time to assess how it approaches targeted violence and terrorism prevention.

With the delay in developing common terminology around targeted violence, the department has not revised its time frames for finalizing and operationalizing the term among DHS offices, components, and relevant external stakeholders. Further, there is some urgency to this requirement because it directly affects the Office for Targeted Violence and Terrorism Prevention's responsibilities to spearhead the department's mission to prevent targeted violence. More specifically, without a common definition for targeted violence, it will be difficult for DHS to assess threats, track trends, and build effective policy within DHS and the stakeholder community.

Conclusions

DHS recognizes the United States faces increasingly complex threats from terrorism and targeted violence. However, the strategy and associated plans lack elements necessary for a comprehensive strategy, such as the sources and types of resources and investments it requires, and the key external factors beyond DHS's control that could significantly affect the achievement of the long-term goals contained in the strategy. Until DHS revises or supplements the strategy to address these key elements, the department will not have the information it needs to make well-informed decisions.

Furthermore, because DHS does not have a documented data governance framework in place to obtain and manage its targeted violence and terrorism prevention data, it risks challenges related to quality, availability, and integrity of the data it uses to support its targeted violence and terrorism prevention mission. Although DHS has started to develop a data governance framework for some areas such as immigration, emergency preparedness, intelligence, and law enforcement, it is important for DHS to fully document and define its process about what the framework would entail for its targeted violence and terrorism prevention mission given the increasing threat to the homeland. This would help the agency determine the effectiveness of its framework, an important consideration given current national-level statistics on terrorism and targeted violence in all its forms are not comprehensive.

Multiple entities across DHS have roles and responsibilities to combat targeted violence and terrorism in pursuit of their respective missions, but DHS has not yet defined targeted violence. As a result, DHS does not have the ability to maintain oversight of its total investment in targeted violence and terrorism prevention across the department. Without consistent terminology, the day-to-day activities and initiatives that DHS develops to operationalize its strategic goals and objectives may not appropriately align with those goals and objectives.

Recommendations for Executive Action

We are making the following three recommendations to DHS:

The Secretary of Homeland Security should ensure that the Office of Counterterrorism and Threat Prevention Policy and affected components and offices revise or supplement DHS's Countering Terrorism and Targeted Violence strategy to include all key elements of a comprehensive strategy. (Recommendation 1)

The Secretary of Homeland Security should ensure that the Chief Data Officer—in consultation with other affected offices and components—incorporates the governance of data needed to support DHS’s targeted violence and terrorism prevention mission into its departmental data governance framework, including determining how targeted violence and terrorism prevention will be represented on the data governance body, conducting a data maturity assessment, and identifying opportunities to increase staff data skills that includes targeted violence and terrorism prevention data. (Recommendation 2)

The Secretary of Homeland Security—in consultation with affected offices and components—should establish common terminology for targeted violence. (Recommendation 3)

Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. In its comments, reproduced in appendix II, DHS concurred with our three 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 DHS revise or supplement its Countering Terrorism and Targeted Violence strategy to include all key elements of a comprehensive strategy, DHS responded that it is conducting a review to identify opportunities and gaps across DHS with respect to the strategy and related implementation plan. Among other things, DHS is considering establishing routine processes to review and update the implementation plan to account for changes in the threat environment, departmental priorities, allocation of budget/resources aligned to support actions, and evaluation of performance metrics and associated outcomes. DHS stated it will evaluate options to revise, supplement, or issue a new version of the strategy once the White House issues updated versions of the National Security Strategy and National Strategy for Counterterrorism, and any other national policy guidance is updated. DHS expects to complete these and other actions by June 30, 2022, which if implemented effectively, would address the intent of our recommendation.

With regard to our second recommendation that DHS incorporate the governance of data needed to support DHS’s targeted violence and terrorism prevention mission into its departmental data governance framework, including determining how targeted violence and terrorism prevention will be represented on the data governance body, conducting a data maturity assessment, and identifying opportunities to increase staff

data skills that includes targeted violence and terrorism prevention data, DHS responded that the Chief Data Officer incorporated targeted violence and terrorism prevention into its Intelligence and Law Enforcement Data Domains, as part of the DHS data governance framework. As such, DHS stated these domains have the lead for any current or future efforts to develop and implement new data-related methods and tools for targeted violence and terrorism data. DHS expects to complete initial actions by July 30, 2021. These actions and their corresponding next steps, if implemented effectively, would address the intent of our recommendation.

With regard to our third recommendation that DHS should establish common terminology for targeted violence, DHS responded that a departmental definition developed in 2018 for targeted violence remains under review and will serve as the basis for a common terminology for targeted violence, once published. Further, DHS stated that the development of an approved DHS definition for targeted violence is also a priority action in the 2021 review of DHS capabilities to address terrorism and targeted violence. DHS expects to complete this action by March 31, 2022, which if implemented effectively, would address the intent of our recommendation.

We are sending copies of this report to appropriate congressional committees, the Secretary of Homeland Security, and other interested parties. In addition, the report will be available at no charge on GAO's website at <http://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 Offices of Congressional Relations and Public Affairs can be found on the last page of this report. Other major contributors to this report are listed in appendix III.



Triana McNeil
Director, Homeland Security and Justice

Appendix I: Objectives, Scope, and Methodology

This report follows our February 2021 report on DHS's 2016 Countering Violent Extremism Grant Program and explores DHS's longer-term efforts to prevent targeted violence and terrorism. Specifically, it examines the extent to which (1) DHS's 2019 strategy to address targeted violence and terrorism prevention includes key elements of a comprehensive strategy, and (2) DHS has developed a data governance structure to help implement its targeted violence and terrorism prevention strategy.

To determine the extent to which DHS's strategy includes the key elements of a comprehensive strategy to guide its counterterrorism and targeted violence efforts, we evaluated DHS's strategy and determined whether it included the elements applicable to a comprehensive strategy. We also reviewed DHS policies and guidance, along with prior White House and DHS strategies and plans; congressional testimonies related to targeted violence and terrorism prevention; and our work evaluating agencies' strategic plans to provide context and determine which criteria to apply to DHS's strategy. In addition, we reviewed a RAND Corporation report on terrorism prevention that was produced at the request of DHS and cited by officials as informative to their planning efforts.

Specifically, in our prior work, we reviewed statutory requirements applicable to agency plans under the Government Performance and Results Act of 1993 and identified seven key elements of a comprehensive strategy as criteria for assessing other agency strategies.¹ According to our prior work, a comprehensive strategy should include a mission statement; a problem definition, scope, and methodology; goals and objectives; activities, milestones, and performance measures; information about organizational roles, responsibilities, and coordination; resources and investments based on balancing risk reductions with costs; and a description of key external factors that could affect the achievement of goals.

Two of our analysts independently reviewed and evaluated the DHS strategy and the related implementation plan with the seven elements for a comprehensive strategy. We determined that the strategy and implementation plan "fully included" an element if they described the entire element, and "partially included" an element when they described some, but not all, parts of that element. If the strategy and implementation

¹See for example, GAO, *Managing for Results: Critical Issues for Improving Federal Agencies' Strategic Plans*, [GAO/IGD-97-180](#) (Washington, D.C.: Sept. 16, 1997); GAO, *Defense Logistics: A Completed Comprehensive Strategy is Needed to Guide DOD's In-Transit Visibility Efforts*, [GAO-13-201](#) (Washington, D.C.: Feb. 28, 2013).

plan did not explicitly cite any of the parts of an element, we determined that the element was “not included.”

In conducting our work, we also contacted and obtained information from various DHS entities that are involved in managing and supporting targeted violence and terrorism prevention efforts to understand their roles and obtain their views on DHS’s targeted violence and terrorism and targeted violence strategic activities. Specifically, we interviewed officials from the Office of Counterterrorism and Threat Prevention Policy; Office for Targeted Violence and Terrorism Prevention; Program Analysis & Evaluation Division; Science and Technology Directorate, and Office of Intelligence and Analysis.

DHS’s Office of Counterterrorism and Threat Prevention Policy leads the department in addressing global transportation security, screening and vetting, watchlisting, information sharing, identity management and credentialing, and biometrics through the development and coordination of department-wide strategy and the administration of programs. This includes the development of DHS’s Strategic Framework for Countering Terrorism and Targeted Violence and the related implementation plan. The Office for Targeted Violence and Terrorism Prevention is the primary entity responsible for building, maturing, and driving the prevention mission in DHS and works to equip and empower local efforts to prevent individuals from mobilizing to violence. DHS’s Office of Program Analysis and Evaluation coordinates performance management across DHS components. DHS’s Science and Technology Directorate conducts basic and applied research, development, demonstration, testing, and evaluation activities relevant to DHS. The Office of Intelligence and Analysis is responsible for sharing intelligence with DHS’s state, local, tribal, and territorial and private sector partners, and developing intelligence from those partners for the department and the Intelligence Community. We met with officials from the Office of Intelligence and Analysis to understand their role related to DHS’s targeted violence and terrorism prevention efforts and the extent to which the Office of Intelligence and Analysis provided risk information to inform these efforts.

To determine the extent to which DHS has implemented a data governance framework for its targeted violence and terrorism prevention data, we reviewed the Office of Management and Budget’s (OMB) Federal Data Strategy and its associated Federal Data Strategy 2020

Action Plan.² These two documents collectively establish a set of principles and leading practices to help agencies leverage data as a strategic asset by supporting strong data governance, among other things. We identified three key activities in the Federal Data Strategy 2020 Action Plan that agencies are to take that relate to data governance. We considered our prior work on data governance to determine which activities would apply to DHS's targeted violence and terrorism prevention data.³ We also used criteria for establishing a common definition of targeted violence. Specifically, we reviewed DHS's Strategic Framework for Countering Terrorism and Targeted Violence Implementation Plan, the DHS Lexicon purpose statements—DHS's unified controlled vocabulary that the department and its components use when communicating and sharing data—and OMB's Federal Data Strategy.

Additionally, we reviewed DHS's Data Governance Charter and its Evidence-Based Data Strategy to determine the department's framework for data governance, and we reviewed DHS's Strategic Framework for Counterterrorism and Targeted Violence Implementation Plan to identify data challenges, plans, and milestones related to targeted violence and terrorism prevention data governance, including plans to add targeted violence to the DHS Lexicon. To provide context for understanding DHS's activities with respect defining key terms for homeland security activities, including terrorism-related definitions, we reviewed reports from the Homeland Security Advisory Council from 2010 through 2019. We selected these reports in part because they contain recommendations to DHS on importance of defining terminology.

We interviewed an official from DHS's Office of the Chief Data Officer to obtain information on DHS's progress in implementing both department-wide data governance and data governance for targeted violence and terrorism prevention. We also interviewed officials from the Office for Targeted Violence and Terrorism Prevention and the Science and Technology Directorate to obtain their views on the data challenges facing the department in meeting its targeted violence and terrorism

²OMB, Federal Data Strategy – A Framework for Consistency, OMB Memorandum M-19-18 (Washington, D.C.: 2019). Federal Data Strategy Development Team, President's Management Agenda: Federal Data Strategy 2020 Action Plan (Washington, D.C.: December 2019).

³GAO, *Data Governance: Agencies Made Progress in Establishing Governance, but Need to Address Key Milestones*, [GAO-21-152](#) (Washington, D.C.: Dec. 16, 2020).

prevention mission, including data governance and establishing a common definition of targeted violence.

To provide contextual information on the number of domestic attacks and deaths associated with violent extremism or targeted violence from 2010 through 2020, we obtained information from the Extremist Crime Database, which is a joint project for collecting and reporting data on extremist-related violence. We used information that we previously reported in February 2021 as well as updated information provided by the Extremist Crime Database Research Team for 2020. In addition, the research team provided first-time data on far-left extremist attacks, which is the primary reason for the increase in number of attacks and deaths for the time period between the two reports.⁴ We reported on this 11-year period because it coincided with the major activities associated with countering violent extremism that we cover to provide context to DHS's strategic activities. 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 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 and year.

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

⁴The 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. Celinet Duran was the principal investigator for the new far-left extremist attack and deaths data. 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.

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.

We conducted this performance audit from September 2020 to July 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Comments from the Department of Homeland Security

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



**Homeland
Security**

June 25, 2021

Triana 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-21-507, "COUNTERING VIOLENT EXTREMISM: DHS Can Further Enhance Its Strategic Planning and Data Governance Efforts"

Dear Ms. McNeil:

Thank you for the opportunity to comment on this report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the 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 DHS's ongoing efforts to prevent terrorism and targeted violence. DHS remains committed to preventing all forms of terrorism and targeted violence. This includes preventing individuals from radicalizing to violence at the earliest possible moment, whether in the physical or online environment, and making it more difficult for them to carry out attacks thereby reducing the potential loss of life.

The Federal Government, however, cannot achieve this objective alone. Accordingly, DHS established the Center for Prevention Programs and Partnerships (CP3) on May 11, 2021 to facilitate Departmental efforts for adopting a community-based approach that builds trusted partnerships across all levels of government and among a multidisciplinary set of partners, including houses of worship, civic organizations, health practitioners, government agencies, law enforcement, and others. This approach furthers DHS' prevention mission, which centers on building local capacity and empowering our partners to prevent targeted violence and terrorism.

The draft report contained three recommendations with which the Department concurs. Attached find our detailed response to each recommendation. DHS previously submitted technical comments addressing several inaccuracies, contextual, and other 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: 2021.06.25 10:00:38 -04'00'

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

Attachment

**Attachment: Management Response to Recommendations
Contained in GAO -21-507**

GAO recommended that the Secretary of Homeland Security:

Recommendation 1: Ensure that the Office of Counterterrorism and Threat Prevention Policy [CTTP] and affected components and offices revise or supplement DHS's Countering Terrorism and Targeted Violence strategy to include all key elements of a comprehensive strategy.

Response: Concur. DHS issued the Strategic Framework for Countering Terrorism and Targeted Violence in September 2019 (Strategic Framework) and its corresponding Countering Terrorism and Targeted Violence Implementation Plan (Implementation Plan) in October 2020, based upon the priorities of the previous Administration. Subsequently, in March 2021, the DHS Office of Strategy, Policy, and Plans (PLCY), Targeted Violence and Terrorism Prevention (TVTP) (now CP3) initiated a review to identify opportunities and gaps across DHS with respect to the Strategic Framework and related Implementation Plan, and current capabilities in the Department's prevention, detection, disruption, and mitigation missions against all forms of foreign and domestic terrorism and targeted violence, including threats that manifest in both the physical and online environments. Once complete, the conclusions identified during the review will help prioritize DHS efforts to:

- counter threats of terrorism and targeted violence;
- inform Department decision-making as it works with the National Security Council on its counterterrorism and Domestic Violent Extremism reviews;
- prioritize, update, and/or modify existing milestones, roles, responsibilities, and timelines identified in the Implementation Plan; and
- support and inform other efforts being conducted across the Department, to include the Fiscal Year 2023 - 2027 Program and Budget Review.

Initial results of the 2021 review revealed that DHS's approach to monitoring and tracking the status of action items identified in the Implementation Plan has been fragmented and inconsistent and lacks dedicated resources and oversight. As a result, DHS identified the following options for consideration:

- Identify a dedicated and centralized management structure and process to oversee execution and tracking of priority activities in the Implementation Plan and provide increased visibility across Components;
- Leverage the findings and priorities from the DHS Counterterrorism and Targeted Violence Posture Review to supplement the Implementation Plan; and,
- Establish routine processes to review and update the Implementation Plan to account for changes in the threat environment, Departmental priorities, allocation

of budget/resources aligned to support actions, and evaluation of performance metrics and associated outcomes.

Based on the final results of this review, DHS will continue to update and execute priority actions identified in the Implementation Plan, as well as the National Strategy for Countering Domestic Terrorism, dated June 15, 2021, but does not plan on revising the current version of the Strategic Framework for Countering Terrorism and Targeted Violence. Once the White House issues updated versions of the National Security Strategy and National Strategy for Counterterrorism, and any other national policy guidance is updated, DHS will evaluate options to revise, supplement, or issue a new version of the DHS strategy to address counter terrorism and targeted violence. This will include all key elements of a comprehensive strategy, as identified by GAO; including:

- resources and investments; and
- key external factors that could affect goals.

Estimated Completion Date (ECD): June 30, 2022.

Recommendation 2: Ensure that the Chief Data Officer—in consultation with other affected offices and components—incorporates the governance of data needed to support DHS’s targeted violence and terrorism prevention mission into its departmental data governance framework, including determining how targeted violence and terrorism prevention will be represented on the data governance body, conducting a data maturity assessment, and identifying opportunities to increase staff data skills that includes targeted violence and terrorism prevention data.

Response: Concur. On May 10, 2021, the DHS Chief Data Officer (CDO) incorporated TVTP into the Intelligence and Law Enforcement Data Domains, as part of the DHS data governance framework. Consequently, the DHS Office of Chief Information Officer’s Intelligence and Law Enforcement Data Domains have the lead for any current or future efforts to develop and implement innovative methods and tools to detect, catalog, assess, and share threat data with federal, state, and local terrorism prevention authorities. The TVTP objectives include:

- increasing the speed of incident identification and notification of designated entities;
- expanding remote access to data;
- increasing intelligence data dissemination to state and local agencies;
- adding mobile data sharing applications; and
- accommodating a wider audience when sharing intelligence data information.

These objectives recognize that establishing Mission Data Domains is an ongoing DHS data governance process and, as DHS’s mission continues to grow, additional mission data domains may be established to support the data aspects of the Department and the unique TVTP data governance requirements.

DHS's CDO also implemented the necessary steps to include TVTP in both the Law Enforcement and Intelligence structure of the Data Governance Council. For example, the CDO Directorate initiated development of an evidence-based strategic plan. Once complete, this plan will identify the necessary actions for the Learning Agenda to increase data skills and promote a data driven culture of continuous and collaborative learning with, and about, data, via ongoing investments in data infrastructure and human resources. ECD: July 30, 2021.

Recommendation 3: Establish common terminology for targeted violence.

Response: Concur. With the 2019 Strategic Framework and 2020 Implementation Plan, DHS called for the development of an updated definition for targeted violence, and PLCY CTP engaged experts from internal offices and components, as well as externally, to craft a new definition for the "DHS Lexicon," dated January 2018. This definition remains under review, and will serve as the basis for a common terminology for targeted violence, once published. The development of an approved DHS definition for targeted violence is also a priority action in the 2021 review of DHS capabilities to address terrorism and targeted violence. ECD: March 31, 2022.

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

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

Staff Acknowledgments

In addition to the contact named above, David A. Lutter (Assistant Director), Jeremy P. Manion (Analyst-in-Charge), Carla D. Brown, Jieun Chang, Pamela R. Davidson, Christine F. Davis, Kathleen Drennan, Eric D. Hauswirth, Susan Hsu, Benjamin T. Licht, Gary M. Malavenda, and Sarah E. Veale made key contributions to this report.

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