

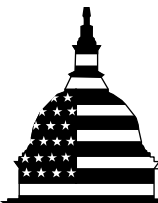
GAO

Report to the Committee on Homeland
Security and Governmental Affairs,
United States Senate

October 2012

**COUNTERING
VIOLENT
EXTREMISM**

**Additional Actions
Could Strengthen
Training Efforts**



G A O

Accountability * Integrity * Reliability

Highlights of [GAO-13-79](#), a report to the Committee on Homeland Security and Governmental Affairs, United States Senate

Why GAO Did This Study

DHS and DOJ have responsibility for training state and local law enforcement and community members on how to defend against violent extremism—ideologically motivated violence to further political goals. Community members and advocacy organizations have raised concerns about the quality of some CVE-related training that DOJ and DHS provide or fund. As requested, GAO examined (1) the extent to which DHS and DOJ have identified and communicated topics that CVE-related training should address to their components and state and local partners, (2) any concerns raised by state and local partners who have participated in CVE-related training provided or funded by DHS or DOJ, and (3) actions DHS and DOJ have taken to improve the quality of CVE-related training. GAO reviewed relevant documents, such as training participant feedback forms and DHS and DOJ guidance; and interviewed relevant officials from DHS and DOJ components. This is a public version of a sensitive report that GAO issued in September 2012. Information that the FBI deemed sensitive has been redacted.

What GAO Recommends

GAO recommends that DOJ identify and communicate principal CVE-related training topics and that FBI field offices and USAOs consider soliciting feedback more consistently. DOJ agreed that it should more consistently solicit feedback, but disagreed that it should identify CVE training topics because DOJ does not have primary responsibility for CVE-related training, among other things. GAO believes this recommendation remains valid as discussed further in this report.

View [GAO-13-79](#). For more information, contact Eileen Larence at (202) 512-8777 or larencee@gao.gov.

October 2012

COUNTERING VIOLENT EXTREMISM

Additional Actions Could Strengthen Training Efforts

What GAO Found

The Department of Homeland Security (DHS) has identified and is communicating to its components and state and local partners topics that the training on countering violent extremism (CVE) it provides or funds should cover; in contrast, the Department of Justice (DOJ) has not identified what topics should be covered in its CVE-related training. According to a DHS official who leads DHS's CVE efforts, identifying topics has helped to provide a logical structure for DHS's CVE-related training efforts. According to DOJ officials, even though they have not specifically identified what topics should be covered in CVE-related training, they understand internally which of the department's training is CVE-related and contributes either directly or indirectly to the department's training responsibilities under the CVE national strategy. However, over the course of this review, the department generally relied upon the framework GAO developed for potential CVE-related training topics to determine which of its existing training was CVE-related. Further, because DOJ has not identified CVE-related training topics, DOJ components have had challenges in determining the extent to which their training efforts contribute to DOJ's responsibilities under the CVE national strategy. In addition, officials who participated in an interagency working group focusing on ensuring CVE-related training quality stated that the group found it challenging to catalogue federal CVE-related training because agencies' views differed as to what CVE-related training includes.

The majority of state and local participant feedback on training that DHS or DOJ provided or funded and that GAO identified as CVE-related was positive or neutral, but a minority of participants raised concerns about biased, inaccurate, or offensive material. DHS and DOJ collected feedback from 8,424 state and local participants in CVE-related training during fiscal years 2010 and 2011, and 77—less than 1 percent—provided comments that expressed such concerns. According to DHS and DOJ officials, agencies used the feedback to make changes where appropriate. DOJ's Federal Bureau of Investigation (FBI) and other components generally solicit feedback for more formal, curriculum-based training, but the FBI does not require this for activities such as presentations by guest speakers because the FBI does not consider this to be training. Similarly, DOJ's United States Attorneys' Offices (USAO) do not require feedback on presentations and similar efforts. Nevertheless, FBI field offices and USAOs covered about 39 percent (approximately 9,900) of all participants in DOJ CVE-related training during fiscal years 2010 and 2011 through these less formal methods, yet only 4 of 21 FBI field offices and 15 of 39 USAOs chose to solicit feedback on such methods. GAO has previously reported that agencies need to develop systematic evaluation processes in order to obtain accurate information about the benefits of their training. Soliciting feedback for less formal efforts on a more consistent basis could help these agencies ensure their quality.

DOJ and DHS have undertaken reviews and developed guidance to help improve the quality of CVE-related training. For example, in September 2011, the DOJ Deputy Attorney General directed all DOJ components and USAOs to review all of their training materials, including those related to CVE, to ensure they are consistent with DOJ standards. In addition, in October 2011, DHS issued guidance that covers best practices for CVE-related training and informs recipients of DHS grants who use the funding for training involving CVE on how to ensure high-quality training. Since the departments' reviews and efforts to implement the guidance they have developed are relatively new, it is too soon to determine their effectiveness.

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Abbreviations

ATAC	Antiterrorism Advisory Council
BJA	Bureau of Justice Assistance
COPS	Office of Community Oriented Policing Services
CPD	Community Policing Development
CREST	Community Relations Executive Seminar Training
CRS	Community Relations Service
CVE	countering violent extremism
DHS	Department of Homeland Security
DOD	Department of Defense
DOJ	Department of Justice
EOUSA	Executive Office for United States Attorneys
FBI	Federal Bureau of Investigation
FEMA	Federal Emergency Management Agency
FLETC	Federal Law Enforcement Training Center
HSAC	Homeland Security Advisory Council
HSGP	Homeland Security Grant Program
HVEB	Homegrown Violent Extremism Branch
I&A	Office of Intelligence and Analysis
IACP	International Association of Chiefs of Police
JAG	Justice Assistance Grant
JTTF	Joint Terrorism Task Force
MCC	Major Cities Chiefs Association
NCAP	National Consortium for Advanced Policing
NCTC	National Counterterrorism Center
NJTTF	National Joint Terrorism Task Force Program
ODNI	Office of the Director of National Intelligence
S&T	Science and Technology Directorate
SLATT	State and Local Anti-Terrorism Training Program
USAO	United States Attorney's Office

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G A O

Accountability * Integrity * Reliability

United States Government Accountability Office
Washington, DC 20548

October 18, 2012

The Honorable Joseph Lieberman
Chairman
The Honorable Susan Collins
Ranking Member
Committee on Homeland Security
and Governmental Affairs
United States Senate

State and local law enforcement and homeland security officials, in partnership with local community members, are the first line of defense against the evolving threat posed by violent extremism—ideologically motivated violence to further political goals.¹ In recent history, the United States has faced violent extremist plots by neo-Nazis and other anti-Semitic hate groups, racial supremacists, and international and domestic terrorist groups. These events included the 2009 shooting at Fort Hood in Texas, the 2010 attempted bombing at Times Square in New York City, and the 2011 attempt by a white supremacist to injure participants of a Martin Luther King, Jr., Day parade with an explosive device in the state of Washington. Since the September 11, 2001, terrorist attacks, al Qaeda and its affiliates and adherents, as well as other extremists, have inspired or directed an expanded range of plots and attacks in the United States. For example, the National Consortium for the Study of Terrorism and Responses to Terrorism, using open sources, developed a database with information on 210 violent Islamic extremists known to have radicalized in North America from 1989 through 2011 to the point of supporting violence. Of these individuals, 80 percent began their radicalization after the events of September 11, 2001, and the subsequent Global War on Terrorism.² The United States government identifies al Qaeda as the preeminent terrorist threat to the country, and the Executive Office of the President has emphasized that the prevalence of particular violent extremist ideologies changes over time and new threats will undoubtedly

¹See White House, *Empowering Local Partners to Prevent Violent Extremism in the United States*, (Washington, D.C: August 2011), for a definition of “violent extremism.”

²University of Maryland National Consortium for the Study of Terrorism and Responses to Terrorism, *Profiles of Islamic Radicalization in North America Database* (College Park, MD: 2010-2011).

arise in the future. Accordingly, the United States government must ensure that its approach to countering violent extremism (CVE) is flexible enough to address a variety of current and possible future threats, whether they are posed by al Qaeda or other groups.

Given the critical role state and local law enforcement officers play in CVE, it is important that they receive high-quality CVE-related training. The Departments of Homeland Security (DHS) and Justice (DOJ) have responsibility for executing several programs and activities related to CVE, some of which include providing or funding CVE-related training for state and local law enforcement officers or community members who partner with law enforcement. However, some community members and advocacy organizations have raised concerns about the quality of CVE-related training, including training that DHS and DOJ provide or fund. In particular, letters that individuals and advocacy organizations submitted to DHS and DOJ have indicated anecdotally that some of the individuals who provide training to state and local law enforcement agencies and community members misunderstand the ideology of violent Islamist extremism and cast aspersions on the vast majority of Muslim Americans who pose no threat to the United States. According to the implementation plan for Empowering Local Partners to Prevent Violent Extremism in the United States (CVE national strategy), the instances of federally sponsored or funded CVE and counterterrorism training that used offensive and inaccurate information underscored a need to improve CVE-related training and develop standards for such training. Further, according to the CVE national strategy, misinformation about the threat and dynamics of radicalization to violence can harm security by sending local stakeholders in the wrong direction and unnecessarily creating tensions with potential community partners.

You requested that we assess DHS and DOJ efforts to ensure the quality of violent extremism training that the departments provide or fund for state and local partners. Specifically, we addressed the following questions:

- To what extent have DHS and DOJ identified and communicated topics that CVE-related training addresses to their components and state and local partners?
- What, if any, concerns have been raised by state and local partners who have participated in CVE-related training provided or funded by DHS and DOJ?
- What actions, if any, have DHS and DOJ taken to improve the quality of CVE-related training?

This report is a public version of the prior sensitive report that we provided to you. The Federal Bureau of Investigation (FBI) determined that some of the information in the prior report was For Official Use Only and Law Enforcement Sensitive, which must be protected from public disclosure. Therefore, this report omits sensitive information about CVE-related training that the FBI provided, including associated costs, and the results of a review that the FBI undertook to assess the quality of its counterterrorism training materials, some of which included CVE-related content. Although the information provided in this report is more limited in scope, it addresses the same questions as the sensitive report. Also, the overall methodology used for both reports is the same.

To address our objectives, we met with DHS and DOJ officials to determine how the departments define and communicate CVE-related training topics, and which departmental training programs were relevant to our review. We analyzed this information to assess the extent to which the departments' efforts allow them to demonstrate fulfillment of their CVE-related training responsibilities under the CVE national strategy. During these initial interviews, DHS and DOJ officials expressed difficulty in responding to our request for CVE-related training materials, in part because agency officials were not clear on which training should be considered CVE-related. Therefore, for the purposes of this review, we developed a framework for what constitutes CVE-related training. This framework identifies three distinct content areas CVE-related training likely addresses: (1) radicalization, (2) cultural competency, and (3) community engagement. We discuss these content areas in greater detail later in this report. We solicited feedback on this framework from DHS and DOJ. DHS officials generally agreed with the content areas we identified, and we incorporated feedback DHS provided, as appropriate. DOJ officials stated that they view the framework as reasonable for the purpose of our review. We focused generally on training provided in fiscal years 2010 and 2011 because "countering violent extremism" is a relatively nascent term. In addition, we focused on training provided to state and local entities because the CVE national strategy identifies CVE-related training for these entities as a major component of the national CVE approach.

For the purpose of this review, we considered training to include instruction, presentations, or briefings. We asked DHS and DOJ components to identify CVE-related offices and programs that would be appropriate to include in the scope of our review utilizing the framework for CVE-related training that we developed. We also asked DHS and DOJ to identify and provide all materials for any training that DHS and DOJ

provided or funded through grant programs for state and local entities, including law enforcement officers and community members, that agencies assumed to be CVE-related based on our framework. We considered the training to be CVE-related if all or a portion of it addressed one or more of the three content areas.³ For training that we determined was CVE-related, we requested information on the approximate number and type of participants that attended each training and the estimated cost of providing the training.⁴ In addition, in July 2012, GAO conducted a web-based survey of training points of contact within 51 state administrative agencies regarding the clarity of guidance DHS provides to recipients of grant funds that can be used for CVE-related training.⁵ Of the 51 state administrative agencies to which we sent a survey, 30 responded for an overall response rate of 59 percent. On the basis of a comparison of the geographic regions and state populations of state administrative agencies that did and did not respond to our survey, we concluded that the experiences of state administrative agencies from some of the larger states may not be captured in our survey results. Nevertheless, the survey results provide insight into the level of clarity about DHS CVE guidance among grantees.

To obtain participant perspectives about CVE-related training, two analysts independently reviewed 8,424 evaluations completed by participants of six DHS and DOJ training programs that were CVE-related according to our framework to identify and categorize any complaints or concerns about this training. To identify complaints or concerns that were submitted to the agencies outside of course evaluations, we asked DHS and DOJ to identify concerns that were submitted to them in writing, conducted keyword searches of LexisNexis and Google, and interviewed representatives, including leaders, of advocacy groups that raised the concerns we identified through our searches. We also interviewed DHS and DOJ officials who oversee these training programs to obtain their

³We refer to training we identified to address one or more of these three content areas as “CVE-related” throughout this report. In addition, whether the training was specifically developed for CVE purposes or if the training was primarily developed for another purpose but addresses at least one of the CVE content areas, we refer to it as “CVE-related.”

⁴The cost of providing some of the training is law enforcement sensitive and not included in this report.

⁵The state administrative agencies that we surveyed are responsible for managing DHS grant awards to states and the District of Columbia and ensuring that grant recipients comply with grant requirements.

perspectives on any concerns or complaints that were raised about the CVE-related training and to learn about any actions agencies took in response to these incidents.

To address what actions DHS and DOJ have taken to improve the overall quality of CVE-related training, we reviewed relevant documents, including recently released guidance and best practices for training that DHS, DOJ, and the FBI developed. We also analyzed the counterterrorism training materials that were CVE-related according to our framework that the FBI determined were inappropriate as a result of its internal review, which the FBI undertook to identify and purge potentially objectionable training materials. This analysis enabled us to better understand the review results with regard to training materials that were CVE-related according to our framework, and provided context for the quality assurance steps the FBI has taken in response to the review. The FBI considers the methodology it used to conduct its internal review and our analysis of the training materials that the FBI considered objectionable to be For Official Use Only; therefore, we did not include that information in this report. In addition, we interviewed DHS and DOJ officials and inquired about guidance agencies adhere to when vetting or reviewing training materials and instructors, as well as other actions they have taken to ensure CVE-related training quality. Appendix I contains additional details on our scope and methodology.

We conducted this performance audit from October 2011 through October 2012 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.

Background

The past decade has seen an increasing emphasis in the United States on the role of state and local entities in the fight against violent extremism. More recently, in August 2011, the White House issued the nation's first CVE strategy, *Empowering Local Partners to Prevent Violent Extremism in the United States*, and in December 2011, it issued an

implementation plan for the CVE national strategy.⁶ The strategy leverages existing programs and structures in order to counter radicalization that leads to violence, rather than creating new programs and funding streams.⁷ The strategy highlights three major areas of activity: (1) enhancing engagement with and support to local communities that violent extremists may target, (2) building government and law enforcement expertise for preventing violent extremism, and (3) countering violent extremist propaganda while promoting U.S. ideals. The strategy also identifies the provision of training to federal, state, and local entities as a major component of the national CVE approach, and the implementation plan notes that the federal government will enhance CVE-related training offered to federal, state, and local agencies. The implementation plan states that this is necessary because of “a small number of instances of federally-sponsored or funded CVE and counterterrorism training that used offensive and inaccurate information.”⁸ Accordingly, one of the objectives of the implementation plan is to improve the development and use of standardized training with rigorous curricula that imparts information about violent extremism, improves cultural competency, and conveys best practices and lessons for effective community engagement and partnerships.

The implementation plan designates federal departments, agencies, and components as leaders and partners regarding certain aspects of CVE, and DHS and DOJ have principal roles in implementing the CVE national strategy. Table 1 identifies the primary federal departments and agencies

⁶The White House, *Empowering Local Partners to Prevent Violent Extremism in the United States*, (Washington, D.C.: August 2011); and the White House, *Strategic Implementation Plan for Empowering Local Partners to Prevent Violent Extremism in the United States*, (Washington, D.C: December 2011).

⁷One such program is the Building Communities of Trust Initiative. Established by DOJ and DHS, this initiative is intended to improve trust among local police, fusion centers, and the communities they serve in order to address the challenges of crime and terrorism prevention. A fusion center is generally a collaborative effort of two or more agencies that provide resources, expertise, and information to the center with the goal of maximizing their ability to detect, prevent, investigate, and respond to criminal and terrorist activity. See Global Justice Information Sharing Initiative, *Fusion Center Guidelines, Developing and Sharing Information and Intelligence in a New Era, Guidelines for Establishing and Operating Fusion Centers at the Local, State, and Federal Levels—Law Enforcement Intelligence, Public Safety, and the Private Sector* (August 2006).

⁸The White House, *Strategic Implementation Plan for Empowering Local Partners to Prevent Violent Extremism in the United States*, 15.

with CVE-related responsibilities and their respective missions. Other agencies involved in implementing the strategy include the Departments of the Treasury, Education, and Commerce, among others.

Table 1: Primary Federal Departments, Agencies, and Components to Which the Implementation Plan for the CVE National Strategy Assigns CVE-Related Responsibilities

Department/ agency	Implementing component	Component mission	Examples of CVE activities described in the implementation plan
DHS	Office for Civil Rights and Civil Liberties	<ul style="list-style-type: none"> Advise DHS leadership, personnel, and partners about civil rights and civil liberties issues. Communicate with individuals and communities whose civil rights and civil liberties may be affected by DHS activities, informing these entities about policies and avenues of redress, and promoting appropriate attention within DHS to these entities' experiences and concerns. Investigate and resolve civil rights and civil liberties complaints filed by the public. 	<ul style="list-style-type: none"> Conduct outreach to communities and quarterly engagement roundtables that include CVE-related topics Implement a campus youth community engagement plan intended to engage young adults on the topic of violent extremism Train law enforcement officials on CVE and cultural issues
	Office of Intelligence and Analysis (I&A)	<ul style="list-style-type: none"> Equip the Homeland Security Enterprise with the intelligence and information it needs to keep the homeland safe, secure, and resilient.^a 	<ul style="list-style-type: none"> Assess the capacity of state correctional institutions to detect and share information regarding individuals who demonstrate behaviors associated with violent extremism while in the correctional system
	Federal Emergency Management Agency (FEMA)	<ul style="list-style-type: none"> Provide assistance, training support, and leadership to help federal, state, tribal, and local governments and the private sector build the operational capabilities needed to successfully implement preparedness strategies. 	<ul style="list-style-type: none"> Administer grants to fund training concerning CVE Leverage existing mechanisms to hold grantees and subgrantees accountable for training related to CVE that they pay for using DHS grant funds
	Science and Technology Directorate (S&T)	<ul style="list-style-type: none"> Strengthen America's security and resiliency by providing knowledge products and innovative technology solutions for the Homeland Security Enterprise.^b 	<ul style="list-style-type: none"> Support research on CVE
	Office of Policy	<ul style="list-style-type: none"> Strengthen homeland security by developing and integrating DHS-wide policies, planning, and programs in order to better coordinate the department's prevention, protection, response, and recovery missions. 	<ul style="list-style-type: none"> Establish a Faith-Based Community Information Sharing Working Group to determine how DHS can (1) better share information with faith communities and (2) support the development of faith-based community information-sharing networks

Department/agency	Implementing component	Component mission	Examples of CVE activities described in the implementation plan
DOJ	FBI	<ul style="list-style-type: none"> Protect and defend the United States against terrorist and foreign intelligence threats. Uphold and enforce the federal laws of the United States not exclusively assigned to another federal agency. Provide leadership and criminal justice services to federal, state, municipal, and international agencies and partners. 	<ul style="list-style-type: none"> Establish the FBI CVE Coordination Office to help assess and leverage existing FBI efforts to better understand and counter violent extremism Coordinate with the National Task Force to develop CVE-specific education and awareness modules^c Disseminate information about violent extremism to state and local entities
	United States Attorneys' Offices (USAO)	<ul style="list-style-type: none"> The U.S. Attorney is the chief prosecutor for the United States in a particular jurisdiction in criminal law cases, and represents the United States in civil law cases as either the defendant or plaintiff, as appropriate. Under the leadership of the U.S. Attorney General, USAOs investigate and prosecute a wide range of criminal activities, including domestic and international terrorism. 	<ul style="list-style-type: none"> Coordinate CVE engagement with communities that may be targeted by violent extremist radicalization Raise awareness about the threat of violent extremism Facilitate partnerships to help identify and prevent radicalization to violence
Office of the Director of National Intelligence (ODNI)	National Counterterrorism Center (NCTC)	<ul style="list-style-type: none"> Integrate and analyze intelligence pertaining to counterterrorism (except for information pertaining exclusively to domestic terrorism). Conduct strategic operational planning for counterterrorism activities across the U.S. government. 	<ul style="list-style-type: none"> Expand briefings and information sharing about violent extremism with state and local law enforcement and government Facilitate a "train the trainer" program to increase the reach of CVE training Review information-sharing protocols to identify ways of increasing dissemination of products to state, local, and tribal authorities
Department of Defense (DOD)	Not specified	<ul style="list-style-type: none"> Provide the military forces needed to deter war and to protect the security of the United States. 	<ul style="list-style-type: none"> Coordinate nontraditional partners' activities within DOD (e.g., counterintelligence and behavioral health) to better understand how to identify and prevent violent extremism within the military

Sources: DHS, DOJ, ODNI, DOD, CVE national strategy, and the CVE national strategy implementation plan.

^aDHS defines the Homeland Security Enterprise as the federal, state, local, tribal, territorial, nongovernmental, and private sector entities, as well as individuals, families, and communities, who share a common national interest in the safety and security of the United States and the American population.

^bAccording to DHS, knowledge products could include resources such as standards and protocols. First responders are individuals responsible for protecting and preserving life, property, evidence, and the environment in the early stages of a terrorist attack, natural disaster, or other large-scale emergency. They include federal, state, and local governmental and nongovernmental emergency public safety, fire, law enforcement, emergency response, and emergency medical personnel. See 6 U.S.C. § 101(6) (defining "emergency response providers").

^cThe National Task Force is led by DOJ and DHS and was established in November 2010 to help coordinate community engagement at the national level. It includes all departments and agencies involved in relevant community engagement efforts and focuses on compiling and disseminating local, national, and international best practices. It is also responsible for connecting regionally and field-based federal components to the full range of federal officials involved in community engagement to maximize partnerships, coordination, and resource sharing.

DHS Has Identified CVE-Related Training Topics but DOJ Has Not, Making It Difficult for DOJ to Demonstrate How It Is Meeting Its CVE Responsibilities

The CVE national strategy implementation plan assigns both DHS and DOJ responsibility for supporting national CVE-related training efforts and emphasizes the importance of collaboration among federal, state, local, and tribal government agencies in order to achieve the goals of the strategy. In order for DHS and DOJ components to determine the extent to which they are fulfilling departmental CVE-related responsibilities, they must be able to identify which of the training they conduct is CVE-related, which requires that they understand what constitutes CVE-related training. The DHS Counterterrorism Working Group, the entity responsible for leading DHS's CVE efforts under the direction of the Principal Deputy Counterterrorism Coordinator, has identified topics to be addressed in CVE-related training that DHS develops, provides, or funds. The group has also undertaken efforts to communicate these topics to other DHS components, state and local law enforcement officials, and grant recipients who may allocate DHS funding for CVE-related training within their states. DHS's communication efforts have helped DHS components and state and local partners to better understand what constitutes CVE-related training, but some DHS grantees who responded to our survey reported that they were not clear as to what topics should be addressed in CVE-related training, and most indicated that it would be helpful for DHS to provide additional information or guidance on topics covered under CVE. DHS plans to undertake additional communication efforts with these grantees to educate them about the principal topics CVE-related training addresses. In contrast, DOJ has not identified topics it considers as CVE-related training. Consequently, DOJ is unable to demonstrate how it is meeting its CVE responsibilities under the CVE national strategy.

DHS Has Identified Principal CVE-Related Training Topics and Made Efforts to Communicate Them

In February 2010, the Secretary of Homeland Security tasked the Homeland Security Advisory Council (HSAC) with developing recommendations regarding how DHS can better support community-based efforts to combat violent extremism domestically, focusing on the issues of training, information sharing, and the adoption of community-oriented law enforcement approaches.⁹ The council established the HSAC CVE Working Group to carry out this tasking, and the working group issued its findings in summer 2010. The HSAC CVE Working

⁹HSAC provides advice and recommendations to the Secretary of Homeland Security. It is composed of leaders from state and local government, first responder communities, the private sector, and academia.

Group determined that CVE-related training should focus on (1) improving the capacity of law enforcement and other government personnel to communicate and collaborate with individuals from diverse religious, ethnic, and racial communities, and (2) promoting understanding of the threats facing a local community and recognizing behavior and indicators associated with those threats. The DHS Counterterrorism Working Group subsequently determined that, in order to support implementation of the CVE national strategy and the HSAC CVE Working Group findings, CVE-related training should address the following: violent extremism (e.g., the threat it poses), cultural demystification (e.g., education on culture and religion), community partnerships (e.g., how to build them), and community policing efforts (e.g., how to apply community policing efforts to CVE). According to the DHS Principal Deputy Counterterrorism Coordinator, identifying these topics helped to provide a logical structure for DHS's CVE-related training-related efforts.

The Counterterrorism Working Group has undertaken efforts to communicate these topics to DHS components that contribute to DHS CVE-related training.¹⁰ Toward the beginning of our review officials from DHS components that contributed to training in fiscal years 2010 and 2011 that was CVE-related according to our framework cited lack of clarity regarding what topics CVE-related training is to address; however, by August 2012, the components reported that the topics were clear, a fact that they attributed to these communications efforts. The Counterterrorism Working Group communicated CVE-related training topics to relevant DHS components during weekly meetings as well as by involving the components in the development of new CVE-related training.¹¹ For example, the Counterterrorism Working Group has invited relevant components to participate in workshops on CVE-related training, provided them with briefings and updates on its CVE-related training

¹⁰During fiscal years 2010 and 2011, components that contributed to CVE-related training included the Office for Civil Rights and Civil Liberties and I&A, which provided CVE-related training; FEMA, which administered grants that could be used for CVE-related training; and S&T, which oversaw research on CVE that was relevant to CVE-related training content. These components are all members of DHS's internal CVE Working Group, which the department established in October 2011 in order to coordinate all CVE activities, policies, and operations across DHS. More than 20 DHS components and offices are represented in the working group.

¹¹These include trainings for experienced state and local law enforcement officers and recruits, correctional facility officers, and federal law enforcement officers. For more information about these trainings, see appendix II.

development efforts, and included them in review of draft CVE curricula. According to Counterterrorism Working Group officials, the group led a series of meetings with these components to communicate and review the content of multiple CVE-related trainings the group is working to develop. According to officials from relevant DHS components, these communication efforts have helped to clarify topics CVE-related training addresses. For example, according to the official that leads CVE-related training that the Office for Civil Rights and Civil Liberties provides, reviewing the CVE curricula under development involves ensuring that training topics are clear and well understood. In addition, according to the S&T official who oversees research on CVE that is to inform CVE-related training content, DHS officials have clearly communicated topics that CVE-related training is to include during weekly meetings that the Counterterrorism Working Group leads involving all DHS CVE Working Group members.

The Counterterrorism Working Group also communicated with state and local partners and associations that DHS collaborates with to achieve national CVE goals regarding DHS's CVE-related training topics. For example, according to the director of a state police academy and a police department lieutenant, the Counterterrorism Working Group has consistently consulted with them in developing training modules addressing CVE topics. The Counterterrorism Working Group is also collaborating to develop and implement CVE-related training curricula with the Major Cities Chiefs Association (MCC), the National Consortium for Advanced Policing (NCAP), and the International Association of Chiefs of Police (IACP).¹² As reported by the official who oversees CVE-related training that the DHS Office for Civil Rights and Civil Liberties provides, such collaboration inherently entails discussion of topics CVE-related training is to address.

¹²MCC is a professional association of police chiefs and sheriffs that is to provide a forum for executives to share ideas, experiences, and strategies for addressing the challenges of policing in large urban communities. MCC membership is composed of chiefs and sheriffs of the 63 largest law enforcement agencies in the United States and 7 largest in Canada. NCAP works to bring together top-tier professionals with backgrounds in law enforcement, academia, the intelligence community, government service, and homeland security to provide law enforcement training and technical assistance programs. IACP is a nonprofit membership organization of police executives, with over 20,000 members in over 100 countries. IACP's leadership consists of the operating chief executives of international, federal, state, and local agencies of all sizes.

DHS Is Undertaking Additional Communication to Help Ensure Grantees Fund CVE-Related Training That Is Consistent with the Goals of the CVE National Strategy

DHS's communication efforts have helped DHS components and state and local partners to better understand what constitutes CVE-related training, but our review indicates that some state administrative agency representatives are not clear about the principal topics CVE-related training addresses, making it difficult for them to determine what CVE-related training best supports national CVE efforts. According to officials from FEMA, which administers DHS grant funding, the agency has increased grant funding available for CVE-related training because the Secretary of Homeland Security has identified CVE efforts as a priority for the department. In particular, in fiscal year 2011, FEMA began to allow state and local entities to use funds awarded through the Homeland Security Grant Program for CVE-related training. Further, in fiscal year 2012, FEMA explicitly stated in its Homeland Security Grant Program funding announcement that grantees could use program funds for CVE-related training, and retroactively allowed recipients to use program funds from prior years for CVE activities. In July 2012, we surveyed the 51 training points of contact within state administrative agencies—which are responsible for managing Homeland Security Grant Program funds that DHS awards—about the extent to which they understand what is meant by CVE training. Of the 30 training points of contact who responded to our survey, 11 indicated that they were not at all clear or were somewhat clear on what is meant by CVE-related training. Further, 26 agreed or strongly agreed that it would be helpful for DHS to provide additional information or guidance on topics covered under CVE. As long as FEMA continues to make grant funding available for CVE-related training, but grantees do not have an understanding of what topics CVE-related training should address, it will be difficult for grantees to determine what training best supports the national CVE objective of improving CVE-related training and use funds appropriately toward those efforts.

DHS Counterterrorism Working Group officials stated that the group had made efforts to communicate CVE-related training topics to state administrative agencies, but in light of our survey results, the group plans to expand its efforts. In winter 2011, the Principal Deputy Counterterrorism Coordinator, who leads DHS CVE efforts, participated in a conference call with State Homeland Security Program advisers and staff who administer DHS grants that can be used for CVE-related training, during which this official highlighted DHS's CVE-related training efforts and associated guidance. Nonetheless, according to the Principal Deputy Counterterrorism Coordinator, some training points of contact may not be aware of what topics CVE-related training should address because the working group's coordination efforts have focused on state and local representatives who administer law enforcement training

programs (e.g., at police academies), not state administrative agencies. The Principal Deputy Counterterrorism Coordinator also emphasized that DHS has focused its efforts on developing high-quality CVE-related training that state and local entities can readily access and that FEMA will pre approve as eligible for DHS grant funding. As a result, according to this official, grantees will rarely have to independently identify appropriate CVE-related training to fund or undertake steps to ensure the quality of CVE-related training they fund.

Nevertheless, the Principal Deputy Counterterrorism Coordinator agreed that our survey results revealed that it is important for DHS to undertake additional efforts to educate state administrative agency officials on the principal topics CVE-related training addresses. To that end, in August 2012, the Principal Deputy Counterterrorism Coordinator held an additional meeting with more than 100 state administrative agency representatives and other federal, state, and local officials, during which the Coordinator provided information on DHS CVE-related training development efforts and the content of DHS's CVE-related training, among other things. In addition, in August 2012, DHS, in partnership with the FBI, launched an online portal for a select group of law enforcement training partners that is intended to provide federal, state, local, tribal, territorial, and correctional law enforcement with access to CVE-related training materials. DHS aims to broaden access to the portal to trainers nationwide by the end of September 2012. Further, the Principal Deputy Counterterrorism Coordinator stated that the Counterterrorism Working Group is developing an outreach strategy for communicating with state and local entities about DHS's CVE-related training efforts. Given the recency of these efforts, we are not able to assess their effectiveness as part of our review. However, they are positive steps that should contribute to educating state administrative agency representatives about CVE topics, and thereby help them to fund CVE-related training that is consistent with the goals of the CVE national strategy.

DOJ Has Not Identified CVE-Related Training Topics, Which Could Preclude DOJ from Demonstrating How It Is Implementing the CVE National Strategy

As with DHS, the CVE national strategy implementation plan has identified DOJ, including the FBI, as among the federal departments and agencies responsible for conducting CVE-related training. However, DOJ has not yet identified topics that should be covered in its CVE-related training. In addition, DOJ has not generally identified which of its existing training could be categorized as CVE-related training, thus limiting DOJ's ability to demonstrate how it is fulfilling its training responsibilities under the CVE national strategy.

According to senior DOJ officials, even though the department has not identified CVE-related training topics, they understand internally which of the department's training is CVE-related and contributes either directly or indirectly to the department's training responsibilities under the CVE national strategy. However, because DOJ has not identified what constitutes CVE-related training, CVE-related efforts undertaken at the direction of the President's National Security Staff have been hindered, according to DHS officials who participated in an Interagency Policy Committee Working Group on Law Enforcement Training Regarding Domestic Radicalization and CVE. This group, which is chaired by DHS and NCTC, was formed at the direction of the President's National Security Staff to identify and coordinate CVE-related training that federal agencies deliver or fund. The group's principal objective was twofold: (1) to determine how agencies are currently developing training and (2) to identify options for ensuring that the Intelligence Community's current analysis of radicalization informs training for federal, state, local, and tribal officials, and that customers of this type of training receive high-quality training and information consistent with U.S. government analysis.¹³ As part of this effort, the Interagency Policy Committee Working Group on Law Enforcement Training Regarding Domestic Radicalization and CVE endeavored to create an inventory of CVE-related training that the federal government offers. However, according to DHS officials that participated in the working group, members who led this effort found it challenging to do so because agencies' views differed as to what CVE-related training includes when providing information on their training. More specifically, according to one DHS official, some components found it difficult to differentiate between counterterrorism and CVE-related training, and trying to categorize training that was not developed for CVE purposes but that can benefit CVE can be confusing. We observed this problem firsthand during our review when the DOJ components that the department identified as potentially relevant to our work, including the FBI, Executive Office for United States Attorneys, and Office of Community Oriented Policing Services could not readily respond to our requests for information about CVE-related training they provide or fund. According to these officials, they found it difficult to respond to our requests because DOJ has not established a definition for "CVE" or "CVE-related training," and therefore they were not sure what constitutes

¹³The U.S. Intelligence Community comprises 17 components, including DHS I&A and the FBI, and is overseen by the Office of the Director of National Intelligence. See 50 U.S.C. § 401a(4).

CVE-related training.¹⁴ Bureau of Justice Assistance (BJA) officials acknowledged that training that BJA funds under the State and Local Anti-Terrorism Training (SLATT) program could be considered CVE-related training, but they also acknowledged that what constitutes CVE-related training was not clear, in part because CVE is a relatively new term. The other DOJ components, however, relied upon a framework that we developed for the purpose of this review to determine which of their existing training was CVE-related.

DOJ officials also said that it would be inappropriate to label certain types of the department's training, such as community outreach training, as CVE-related because doing so would be imprecise and misleading. These officials explained that DOJ CVE activities include efforts that are specifically designed for CVE-related purposes as well as efforts that are not specifically designed for CVE-related purposes, but that may indirectly benefit the department's CVE efforts. For example, the DOJ Community Relations Service conducts outreach in communities and invites community members to assist in providing cultural competency training to enhance law enforcement officers' understanding of and sensitivity to cultural and religious practices of the Arab, Muslim, and Sikh American communities.¹⁵ However, DOJ officials expressed concern that labeling outreach, or training on how to conduct outreach, as CVE-related would imply that these efforts are driven by security efforts when they are not. Nevertheless, the CVE national strategy and implementation plan publicly

¹⁴The Executive Office for United States Attorneys is to act as a liaison between DOJ and the 93 United States Attorneys' offices, which may partake in CVE-related activities. The Office of Community Oriented Policing Services works to advance the practice of community policing in America's state, local, and tribal law enforcement agencies by sharing information and making grants to police departments around the United States. The Bureau of Justice Assistance's mission is to provide leadership and services in grant administration and criminal justice policy development to support local, state, and tribal justice strategies to achieve safer communities.

¹⁵The Community Relations Service is DOJ's "peacemaker" for community conflicts and tensions arising from differences of race, color, and national origin. It is dedicated to assisting state and local units of government, private and public organizations, and community groups with preventing and resolving racial and ethnic tensions, incidents, and civil disorders, and in restoring racial stability and harmony. According to DOJ, pursuant to the Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act, the Community Relations Service also works with communities to develop strategies to prevent and respond more effectively to alleged violent hate crimes committed on the basis of race, color, national origin, gender, gender identity, sexual orientation, religion, or disability. See generally Pub. L. No. 111-84, Div. E, 123 Stat. 2190, 2835 (2009). See also 18 U.S.C. § 249.

and explicitly emphasize the importance of community engagement in CVE efforts while recognizing that such engagement should focus on a full range of community concerns, and not just on issues such as national security. Further, the implementation plan has assigned DOJ responsibility for supporting national CVE-related training efforts. However, because DOJ has not identified what topics it thinks should be addressed by CVE-related training, it is difficult to identify which of DOJ's current training is related to CVE—either directly or indirectly, which also makes it difficult to determine whether and how DOJ is fulfilling its training responsibilities per the CVE national strategy.

If departments are unclear regarding what constitutes CVE-related training, they will also have difficulty accounting for their CVE-related training responsibilities. By not identifying and communicating CVE-related training topics to its components, DOJ is not able to demonstrate how it is fulfilling its CVE-related training responsibilities and ensure that it is carrying out its responsibilities as established in the CVE national strategy implementation plan.

Few Participants Raised Concerns about DHS and DOJ CVE-Related Training, but the FBI and USAOs Could Help Ensure Quality of Training by More Consistently Soliciting Feedback

Less than 1 percent of state and local participants in CVE-related training that DHS and DOJ provided or funded who provided feedback to the departments expressed concerns about information included in the course materials or that instructors presented during training. In addition, while DOJ generally solicits feedback from all participants for programs that provide formal, curriculum-based CVE-related training, the FBI and USAOs do not always solicit feedback for programs that provide less formal CVE-related training (e.g., presentations by guest speakers), even though such training was provided to about 9,900 participants in fiscal years 2010 and 2011. Finally, apart from the training participants, some individuals and advocacy organizations have raised concerns about DHS and DOJ CVE-related training.

As previously discussed, because DHS and DOJ components were unclear regarding what constitutes CVE-related training, for the purposes of conducting this review, we developed a framework for determining which training may be CVE-related. Our framework identifies training as CVE-related if it addressed one or more of the following three content

areas: (1) radicalization, (2) cultural competency, and (3) community engagement.¹⁶



DHS Counterterrorism Working Group officials generally agreed with the content areas we identified, and we incorporated feedback the group provided, as appropriate. DOJ officials stated that they view the framework as reasonable for the purpose of our review. However, as previously discussed, DOJ officials do not think it is appropriate for DOJ to identify topics as addressed in CVE-related training.¹⁷

We applied our framework to identify CVE-related training DOJ and DHS components provided to state and local entities during fiscal years 2010 and 2011. Figure 1 presents the DOJ and DHS programs that provided the CVE-related training we identified, and appendix III provides more detailed information about the training, including the number of participants and associated costs.

¹⁶Radicalization addresses approaches that are based on research and accurate information to understanding the threat radicalization poses, how individuals may become radicalized, how individuals seek to radicalize Americans (threat of violent extremist recruitment), behaviors exhibited by radicalized individuals, or what works to prevent radicalization that results in violence. Cultural competency seeks to enhance state and local law enforcement's understanding of culture or religion, and civil rights and civil liberties, or their ability to distinguish, using information-driven and standardized approaches, between violent extremism and legal behavior. Community engagement addresses ways to build effective community partnerships, such as through outreach, and community capacity for the purpose of, among other things, mitigating threats posed by violent extremism. See appendix I for more detailed information about how we developed and applied the framework.

¹⁷According to the FBI, while the bureau has conducted counterterrorism training in the past, it would not be appropriate to categorize any of what FBI considers to be counterterrorism training as CVE-related training because the term "CVE" is relatively nascent, neither the FBI nor DOJ has defined what constitutes CVE-related training, and there is a distinction between counterterrorism and CVE. However, the CVE national strategy implementation plan identifies certain activities that the FBI has undertaken as CVE-related. For instance, the implementation plan cites briefings that the FBI provided in collaboration with DHS, NCTC, and the National Intelligence Council—which serves as a bridge between the intelligence and policy communities—on violent extremism as an example of national CVE efforts. In addition, our framework does not identify CVE-related training and counterterrorism training as mutually exclusive. For instance, if the primary focus of training is counterterrorism, certain topics addressed by the training may be CVE-related. As FBI training programs described in figure 1 used course materials during fiscal years 2010 and 2011 that addressed at least one of the CVE content areas identified by our framework, we are nonetheless categorizing them as CVE-related for the purpose of our review.

Figure 1: DHS and DOJ Components and Programs That Provided CVE-Related Training during Fiscal Years 2010 and 2011

 Department of Justice	 Department of Homeland Security
<p>Bureau of Justice Assistance</p> <ul style="list-style-type: none"> • State and Local Anti-Terrorism Training Program 	<p>Office for Civil Rights and Civil Liberties</p> <ul style="list-style-type: none"> • Civil Rights and Civil Liberties Institute
<p>Federal Bureau of Investigation</p> <ul style="list-style-type: none"> • Community Relations Executive Seminar Training • Citizens' Academy • National Joint Terrorism Task Force Program • National Academy 	<p>Office of Intelligence and Analysis</p> <ul style="list-style-type: none"> • Homegrown Violent Extremism Branch • State and Local Program Office
<p>United States Attorneys' Offices</p>	
<p>Community Relations Service</p>	

Source: GAO.

State and Local Participants' Perspectives on CVE-Related Training Were Mostly Positive or Neutral

The majority of participant feedback on CVE-related training that DHS and DOJ provided or funded during fiscal years 2010 and 2011 was positive or neutral; a minority of participants expressed concerns about information included in course materials or that instructors presented. DHS and DOJ collected and retained feedback forms from 8,424 of the more than 28,000 participants—including state, local, and tribal law enforcement officials, prison officials, and community members—of training they provided or funded in fiscal years 2010 and 2011 that was CVE-related according to our framework.¹⁸ We analyzed all of these

¹⁸The departments did not collect feedback from all participants that attended CVE-related training during this period. For example, while the FBI requires solicitation of feedback for its centrally administered, curriculum-based courses, it does not require the solicitation of feedback for its Community Relations Executive Seminar Training and Citizens' Academy outreach programs, or other briefings or presentations that FBI field offices provide, because it does not consider these programs and activities as training. Similarly, USAOs are not required to obtain feedback from recipients of presentations and briefings that their individual offices provide. In addition, some of the State and Local Anti-Terrorism Training Program, National Joint Terrorism Task Force, and USAO trainings for which we reviewed feedback forms included federal participants. In these instances, as participants did not indicate their affiliated agency on the feedback forms, we reviewed all completed forms, including those that may have been filled out by federal officials.

evaluations and found that the vast majority of participants submitted comments about the training that were positive or neutral. For example, participants commented that the courses were among the most challenging they had taken, that the instructors were professional and knowledgeable, or that the course materials were well assembled. In addition, participants stated that the training was informative with regard to the threat posed by, and how to best counter, violent extremists or provided a valuable overview of an extremist group. In another instance, a participant stated that the course was helpful in understanding the beliefs and concerns of a particular community. Some participants also said that the training would be worthwhile to provide to a broader audience, that they intended to share what they learned with colleagues, or that they would like to see the course length expanded. We also identified 77 participant evaluations—less than 1 percent—that included comments that expressed concern of any sort. For example, we identified concerns that a training was too politically correct, as well as concerns that a training was one-sided, with regard to issues of religion and culture. The concerns the participants expressed fell into the following three categories:

1. The course information or instruction was politically or culturally biased (54 evaluations). For example, participant comments that fell into this category were that the instructor had a liberal bias, and other comments were that the instructor too often relayed his or her personal views.
2. The course information or instruction was offensive (12 evaluations). For example, one concern raised in this category was that an instructor presented Islam in a negative manner, whereas another concern was that a guest presenter spoke disrespectfully about the United States.
3. The course information was inaccurate (11 evaluations). For example, comments that fell into this category raised concern that an instructor provided misinformation about dressing norms for Middle Eastern women and that an instructor cited incorrect information about a criminal case discussed during the class.

The concerns that were raised varied across different training providers and, although few, most of the concerns stemmed from the evaluation records documenting feedback from DOJ SLATT Program and FBI National Joint Terrorism Task Force Program participants. See appendix IV for additional details on the types of concerns by training provider.

DOJ and DHS officials who oversee these training programs indicated that they review the feedback participants provide and assess if it warrants action. However, these officials stated that determining how to respond to feedback can be difficult when the feedback is subjective or not actionable. For example, the SLATT Program Director stated that if a comment simply says “one-sided information,” he cannot take action on it because he does not know which side the person is referring to or what the person thinks should be changed. However, if there is a trend in clear feedback participants provided, he will take action. Further, according to SLATT and Office for Civil Rights and Civil Liberties officials, perceptions regarding what is biased vary by audience and even by the participants within a given audience. Therefore, DHS and DOJ officials stated that they take action to address participant feedback on a case-by-case basis, as they and their staff deem appropriate. For example, the SLATT Director explained that there is no specific threshold to determine whether a participant’s comment warrants further action, but generally, if a similar concern has been submitted by multiple participants, over multiple courses, SLATT officials will review the substance of the comment and devise a plan to correct the issue. For example, the SLATT Director noted that in response to a comment that a course title did not reflect the material taught in the course, he suggested a change to the title.

More Consistently Soliciting Feedback on Informal CVE-Related Training Could Provide Information to Help Ensure Its Quality

Most of the CVE-related training that DHS and DOJ components provided was formal, classroom-based or curriculum-based training, and the components generally solicited participant feedback for this type of training, which we describe above.¹⁹ In addition, two DOJ components—FBI and USAOs—also provided informal CVE-related training consisting of briefings and presentations at workshops, conferences, and other venues to about 9,900 participants in fiscal years 2010 and 2011. However, these components did not consistently solicit participant feedback for this type of training, which makes it difficult for them to assess the quality of the training, determine whether the training is achieving expected outcomes, and make changes where appropriate.

¹⁹According to CRS officials, the service has used evaluations in the past, but too few participants returned course evaluations, thus limiting the service’s ability to analyze them effectively. The service is in the process of instituting new procedures for distributing, collecting, and reviewing course evaluations that it expects will improve the number of evaluations returned, according to these officials.

According to FBI officials, training that the FBI centrally administers—including that provided under the National Academy and National Joint Terrorism Task Force programs—is to adhere to the Kirkpatrick model to help ensure its quality.²⁰ The standards this model prescribes require the solicitation of student feedback. As a result, the FBI collects feedback through evaluations on the formal, classroom-based courses it provides through its National Academy. The FBI does not require entities providing informal training, such as briefings and presentations during outreach, to solicit feedback.²¹ Specifically, officials from the FBI’s Office of Public Affairs told us that the bureau does not solicit feedback on presentations, briefings, or its Citizens’ Academy and Community Relations Executive Seminar Training (CREST) outreach programs because doing so is not required, and the officials noted that the FBI does not classify these programs and activities as training.²² Officials also noted that some field offices, which administer the programs, do solicit feedback from participants although they are not required to do so. For example, 4 of 21 FBI field offices that provided Citizens’ Academy training that was CVE-related according to our framework collected evaluations. However, none of the 3 FBI field offices that provided CREST training or the 5 FBI field offices that provided other training that was CVE-related according to our framework solicited feedback from course participants. Similarly, USAOs are not required to obtain feedback from recipients of training that their individual offices provide. According to Executive Office for U.S. Attorneys officials, USAOs do not typically solicit feedback from participants on the

²⁰The Kirkpatrick model is a multilevel approach to evaluate an organization’s training and development efforts. Soliciting feedback from course participants is a key element in this model, which consists of four levels of evaluation. The first level measures the training participants’ reaction to, and satisfaction with, the training program through the collection of feedback. The second level measures the extent to which learning has occurred because of the training effort. The third level measures the application of this learning to the work environment through changes in behavior that trainees exhibit on the job because of training. Finally, the fourth level measures the impact of the training program on the agency’s program or organizational results.

²¹The FBI’s Citizens’ Academy and CREST programs are provided to business and religious leaders and members of the community to provide them with firsthand experience with how the FBI investigates crimes and threats to national security, as well as to educate them about the various tools and techniques it employs to carry out its mission. Some Citizens’ Academy and CREST sessions include CVE-related presentations. For more information, see appendix III.

²²The CREST and Citizens’ Academy programs are provided directly by FBI field offices. However, the Office of Public Affairs provides administrative and logistical support and suggestions for program execution.

presentations that our framework identified as CVE-related that they provide in their districts, particularly with respect to threat-related briefings for law enforcement officials that are intended to address a particular area of concern for that region at a particular time. Under these circumstances, according to these officials, feedback may be less useful than it would be for curriculum-based trainings, because the presentation is less likely to be repeated for many different audiences. We identified 39 USAOs that provided or facilitated training that was CVE-related according to our framework, excluding training that was facilitated by a USAO, but provided by another federal entity (such as SLATT).²³ Out of these 39 USAOs, 15 collected feedback from CVE-related training participants.

We have previously reported that evaluating training is important and that agencies need to develop systematic evaluation processes in order to obtain accurate information about the benefits of their training.²⁴ We recognize the distinction between formal training programs and less formal training, such as presentations. However, the CREST and Citizens' Academy programs, other FBI field office initiatives, and USAOs collectively trained about 39 percent (about 9,900) of all training participants in DOJ CVE-related training during fiscal years 2010 and 2011. Soliciting feedback on informal training could help the FBI and USAOs obtain valuable information for determining the extent to which these programs are yielding desired outcomes (e.g., whether the FBI's Citizens' Academy is projecting a positive image of the FBI in the communities it serves) as well as complying with the CVE national strategy. Such feedback could also be obtained without incurring significant costs. According to officials at a FBI field office that distributes feedback forms and the DHS official who oversees the Office for Civil Rights and Civil Liberties CVE-related training, agencies can solicit feedback from training participants at minimal cost (e.g., the paper on which the form is distributed and the employee time associated with reviewing the forms), feedback is critical to ensure the training is communicating its intended messages effectively, and soliciting feedback is a worthwhile undertaking given the significant time and resources their offices invest in providing CVE-related training.

²³Officials noted that SLATT is a program administered by the Bureau of Justice Assistance but often is hosted and facilitated by USAOs. Feedback is solicited from SLATT training participants, which is considered to be formal training.

²⁴GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: Mar. 1, 2004).

Some Individuals and Advocacy Organizations Have Raised Some Concerns about CVE-Related Training

In addition to the concerns we identified in participant evaluations, individuals and advocacy organizations submitted at least six letters of complaint to DHS, DOJ, the Executive Office of the President, and other federal government entities regarding 18 alleged incidents of biased CVE and counterterrorism training that DHS or DOJ provided or funded during fiscal years 2010 and 2011.²⁵ Representatives of the advocacy organizations that submitted the letters generally did not participate in the training that generated these concerns. Rather, their concerns were derived from information reported in the media and individuals who attended a training session and expressed concern about the training to the organizations. We determined that 7 of the alleged incidents described in five of the letters were relevant to this review because they pertained to CVE-related training provided to state and local officials and community members, not training that was exclusively provided to federal officials.²⁶ The 7 incidents described in these letters, some of which the media initially reported, articulated similar concerns as those identified in the participant evaluations we reviewed. That is, the allegations made in the letters raised concerns that course information and instructors were biased, offensive, or inaccurate. Table 2 summarizes the concerns raised in these five letters and the agency's perspectives about the concerns.

²⁵To identify these letters of concern, we reviewed open source information, contacted advocacy organizations, and requested all complaints regarding CVE-related training sent to DHS and DOJ during fiscal years 2010 and 2011. See appendix I for more information regarding our methodology.

²⁶The other 11 incidents discussed in the letters cited were outside of the scope of this review because, for example, they pertained to training that was provided exclusively to federal officials or occurred before fiscal year 2010. As a result, they are excluded from this analysis.

Table 2: Concerns Raised in Letters Submitted to DHS and DOJ during Fiscal Years 2010 and 2011 Regarding CVE-Related Training and Agency Perspectives

Training provider	Concern raised	Agency perspective
FBI local-level Joint Terrorism Task Force (JTTF) ^a	Two letters sent to the FBI signed by 28 organizations alleged, among other things, that a known anti-Islamic speaker was invited by FBI's Virginia Tidewater JTTF to provide training to state and federal law enforcement officers.	According to the FBI Assistant Special Agent in Charge of the office that arranged the presentation, the speaker was brought in as an "enrichment speaker" to present his perspective on Islam, and the speaker did not provide formal training. According to this official, although no audience members voiced concern about the presentation, the field office will not invite the speaker to present in the future.
FBI Citizens' Academy	A letter sent to the FBI by a community member who attended a Seattle-based Citizens' Academy and a letter undersigned by 18 organizations alleged that course materials compared Islamic religious materials to propaganda used by Nazis.	According to the Special Agent in Charge of the office that provided the training, the information cited in the concern was not part of the established course materials or presentation. Rather, a participant had asked the instructor a question by email following the class, which the instructor responded to in writing and this response was distributed to all course participants. The office no longer distributes such responses. According to field office officials, the instructor's response did not make a link between Islam and Nazism as alleged in the letter. Rather, according to field office officials, the instructor's response made a link between propaganda used in Islamism (which officials identified as a political ideology that can include jihad) and Nazism.
FBI field office	A letter sent to the FBI that was signed by 18 organizations alleged that two FBI agents participating in an outreach workshop provided to community members in Seattle delivered a presentation to members of the East African, Muslim, Sikh, and Arab communities addressing terrorist groups and community members with an almost exclusive focus on Islamic groups. According to this letter, when audience members asked the agents if a photo of a figure in the presentation was of Ayatollah Ruhollah Khomeini, a political and religious leader, they did not know who he was.	The Special Agent in Charge of the field office explained that the field office provided the presentation referred to in the letter at the request of a local law enforcement agency that specifically asked the office to provide an international terrorism presentation. According to the Special Agent in Charge, the presentation provided was a valid reflection of current intelligence information pertaining to the types of individuals who have engaged in international terrorism. However, officials stated that, moving forward, the office would also include information on domestic terrorism, which will lend itself to presenting information about a greater variety of terrorist groups. Officials also acknowledged that the agents should have been able to identify the individual in the photo. Following this incident, the Special Agent in Charge organized meetings with local advocacy organizations and individuals to discuss the incident.
FBI National Joint Terrorism Task Force Program	A letter was submitted to the Executive Office of the President's Deputy National Security Advisor and a copy was also sent to DOJ. It was signed by 57 organizations and alleged that orientation material for all 4,400 members of the FBI's Joint Terrorism Task Force stated that "Sunni Muslims have been prolific in spawning numerous and varied fundamentalist extremist terrorist organizations. Sunni core doctrine and end state have remained the same and they continue to strive for Sunni Islamic domination of the world ..."	FBI officials from the Counterterrorism Division, which includes the National Joint Terrorism Task Force Program, told us they were not familiar with this concern, and looked into it upon GAO's inquiring about the FBI's position on it. They found that the FBI Inspection Division reviewed the training material that was the subject of this complaint as part of its internal review of counterterrorism training materials, described in further detail later in this report, and determined that the material was consistent with the FBI's guiding principles for training. That is, the FBI assessed the materials to, among other things, conform to constitutional principles, adhere to the FBI's core values, be tailored to the intended audience, and focused to ensure message clarity.

Training provider	Concern raised	Agency perspective
FBI analyst	A letter was submitted to DOJ and signed by 18 organizations. It alleged that an individual identified as an FBI analyst delivered a lecture to law enforcement officials in New York City in June 2011 during which the analyst asserted that the fight against al Qaeda is a waste compared with the threat presented by the ideology of Islam, and that it would be a waste of time to turn to the American Muslim community for assistance in finding and stopping radical terrorists.	According to FBI officials, the FBI analyst who provided this presentation did not do so on behalf of the FBI. Rather, according to these officials, the analyst served as an adjunct professor independent of the FBI, and provided the presentation in that independent capacity. Nonetheless, FBI officials stated that the information the analyst presented was taken out of context. FBI officials further stated that the analyst has only provided training on behalf of the FBI on one occasion, in April 2011. Following the training, the FBI determined that the analyst was not sufficiently effective at teaching the course, and he has not provided training on behalf of the FBI since that time.
DHS Homeland Security Grant Program recipient	A letter of concern was sent to DHS by one organization and alleged that DHS funds were used to pay an anti-Islamic author \$5,000 to appear at a conference in South Dakota that was sponsored by the South Dakota Department of Public Safety.	DHS officials verified that a grantee used DHS grant funds to pay the speaker to appear at a conference, and stated that the grantee was not aware of the speaker's controversial stature and was not required to obtain pre approval from DHS to use grant funds to hire the speaker. Once the state learned of the speaker's controversial stature, according to DHS officials, it ended its contract with the speaker as an approved training provider for the state. DHS explained that if the same situation were to occur again, in light of grant guidance DHS subsequently issued related to ensuring the quality of CVE-related training, it would likely require the grantee to repay the department the funds it used to pay the speaker, as spending money to hire the speaker would be inconsistent with DHS guidance.
USAO	A letter sent to DOJ by three organizations alleged that a USAO intelligence specialist made inaccurate and biased claims against Muslims during a training. For example, the letter alleged that the specialist asserted that American Muslims are waging a "Civilizational Jihad" against the United States through "civilians, juries, lawyers, media, academia and charities" who threaten "our values."	The U.S. Attorney for the district that provided this training stated that upon becoming aware that there were concerns about the content of the slides used for the presentation, the office immediately discontinued providing the presentation. The U.S. Attorney also explained that the controversial text on the slide was a direct quote from an exhibit entered into evidence during a counterterrorism prosecution, and that the presentations slides were not intended for public dissemination (they were labeled sensitive), where they could be misinterpreted by individuals who were not privy to the context in which they were presented.

Source: GAO analysis of open source information and information provided by DHS, DOJ, and advocacy organizations.

^aA JTTF is an investigative unit consisting of law enforcement and other specialists from federal, state, and local law enforcement and intelligence agencies, led by DOJ and the FBI. Each of the FBI's 56 main field offices has a task force, and additional task forces are located in smaller FBI offices.

DOJ Has Undertaken Reviews and DHS and DOJ Have Developed Guidance to Improve Training Quality

Although the number of concerns and complaints raised about CVE-related training may have been small, according to DHS and DOJ officials, the departments have generally considered the complaints as serious issues that warranted action to better ensure the quality of future training, particularly given the negative effects that such incidents can have on the departments' reputations and trust with the communities they serve. For example, according to the DHS Principal Deputy Counterterrorism Coordinator, developing CVE-related training is a

priority for the department because inappropriate and inaccurate training undermines community partnerships that are critical to preventing crime and negatively impacts efforts of law enforcement to identify legitimate behaviors and indicators of violent extremism. DOJ has undertaken quality reviews of existing training materials that are CVE-related according to our framework, and both DOJ and DHS have developed guidance for CVE-related training and developed other quality assurance mechanisms for this training.

DOJ Components Have Undertaken Reviews of CVE-Related Training

DOJ components have conducted or are currently conducting internal reviews of their training materials, including those with topics that our framework identified as related to CVE, in an effort to identify and purge potentially objectionable materials.

In September 2011, the FBI launched a review of all FBI counterterrorism training materials, including materials that were CVE-related according to our framework. This review included approximately 160,000 pages of training materials, and the FBI determined that less than one percent of the pages contained factually inaccurate or imprecise information or used stereotypes.

The Office of the Deputy Attorney General has also ordered a departmentwide review of training materials. Unlike the FBI's internal review, which focused on counterterrorism training materials, a memorandum issued by the Deputy Attorney General to heads of DOJ components and U.S. Attorneys in September 2011 directed them to carefully review all training material and presentations that their personnel provided. The memorandum stated components particularly should review training related to combating terrorism, CVE, and other subjects that may relate to ongoing outreach efforts in Arab, Muslim, Sikh, South Asian, and other communities. The purpose of the review was to ensure that the material and information presented are consistent with DOJ standards, goals, and instructions. Officials from the four DOJ components that we identified as having provided or funded CVE-related training reported that their components have completed, or intend to complete, the review the Deputy Attorney General ordered. According to DOJ officials, as of August 2012, some components are still reviewing relevant materials and the Deputy Attorney General asked components to provide any questionable training materials to the Deputy Attorney

General's office.²⁷ DOJ officials also told us that each DOJ component is to make its own determination on what materials are appropriate, but that components are to review all training materials, even if the components do not have specific plans to present the materials in the future.

DHS and DOJ Have Developed Guidance Intended to Avoid Future Incidences of Biased or Otherwise Inappropriate Training

DHS, DOJ, and the FBI have developed guidance to avoid future incidences or allegations of biased or otherwise inappropriate training. In October 2011, the DHS Office for Civil Rights and Civil Liberties issued *Countering Violent Extremism Training Guidance & Best Practices* (DHS CVE Guidance), which acknowledges that it is important for law enforcement personnel to be appropriately trained in understanding and detecting ideologically motivated criminal behavior and in working with communities and local law enforcement to counter domestic violent extremism.²⁸ The DHS CVE guidance states that training must be accurate, based on current intelligence, and include cultural competency training. To this end, its goals are to help ensure that (1) trainers are experts and well regarded; (2) training is sensitive to constitutional values; (3) training facilitates further dialogue and learning; (4) training adheres to government standards and efforts; and (5) training and objectives are appropriately tailored, focused, and supported. The guidance provides best practices for federal, state, and local officials organizing CVE, cultural awareness, or counterterrorism training to adhere to in support of these goals. Best practices include reviewing a prospective trainer's résumé; reviewing the training program to ensure that it uses examples to demonstrate that terrorists and violent extremists vary in ethnicity, race, gender, and religion; and reaching out to sponsors of existing government training efforts for input.

Following the release of DHS's CVE Guidance, FEMA issued an information bulletin to its state, local, and private sector partners and grantees to emphasize the importance of ensuring that all CVE-related

²⁷Although some USAOs reported that they have not yet reviewed training materials they used in fiscal years 2010 and 2011 that we identified as CVE-related, officials from the Executive Office for United States Attorneys stated that the office will continue to work with the U.S. Attorneys' Offices to execute any further review of training materials that is required by the Office of the Deputy Attorney General.

²⁸DHS, Office for Civil Rights and Civil Liberties. *Countering Violent Extremism (CVE) Training Guidance and Best Practices*. October 2011.

training is consistent with DHS and U.S. government policy.²⁹ This bulletin referenced the DHS CVE Guidance and stated, among other things, that grant-funded training should avoid the use of hostile, stereotypical, or factually inaccurate information about Muslims and Islam or any community. The bulletin also emphasized the importance of community engagement and interaction to promote communities as part of the solution. According to FEMA officials, if a grantee were to provide CVE-related training and not follow the DHS CVE guidance, DHS may require that the grantee repay any grant funds that were spent on the training. However, several DHS grantees indicated that they would not necessarily know when to apply the best practices for ensuring the quality of CVE-related training described in the informational bulletin. Specifically, of the 30 Homeland Security Grant Program training points of contact who responded to our survey, 18 said that they were not at all clear or only somewhat clear about when to apply the principles in the FEMA bulletin. In addition, 20 said that topics that may be covered during CVE-related training are not at all clear or only somewhat clear in the bulletin. As a result, these grantees could have difficulty in determining when to apply the principles. As previously discussed, the additional efforts DHS is undertaking to educate state administrative agency officials on the principal topics CVE-related training addresses could further enable the officials to fund training that supports the CVE national strategy. These survey results indicate that such educational efforts should help grantees more readily identify topics that may be covered during CVE-related training, and thus more appropriately apply DHS CVE-related training quality assurance guidance.

DHS is also developing additional mechanisms to ensure the quality of CVE-related training. Specifically, Counterterrorism Working Group officials told us that in June 2012 DHS established a CVE-related training Working Group within the department to develop a framework to (1) ensure that training DHS components provide meets DHS and the U.S. government's CVE standards; (2) ensure that grantees using grant funds for training utilize certified trainers; and (3) disseminate DHS training through agency partners, such as the International Association of Chiefs of Police. In July 2012, this working group proposed recommendations for meeting these goals in a memorandum to the DHS Deputy

²⁹FEMA Information Bulletin #373, *Ensuring Training on Counter Terrorism and Countering Violent Extremism is Consistent with USG and DHS Policy* (Washington, D.C.: Oct. 7, 2011).

Counterterrorism Coordinator. For example, the group recommended that the department establish and maintain a database of certified CVE instructors and appoint a CVE program coordinator to oversee the instructor vetting and training process. According to Counterterrorism Working Group officials, DHS is working on plans to implement these recommendations. As these recommendations were made recently and DHS has just decided to implement them, it is too early to assess any quality assurance impact they will have on CVE-related training.

DOJ also developed guidance applicable to all training, including CVE-related training, conducted or funded by DOJ to help ensure its quality. DOJ formed a working group on training issues chaired by its Civil Rights Division within the Attorney General's Arab-Muslim Engagement Advisory Group.³⁰ The working group developed the DOJ training principles to guide DOJ's training and to ensure that all communities that DOJ serves are respected. In March 2012, the Deputy Attorney General issued a memorandum for DOJ heads of components and USAOs outlining guiding principles to which all training that DOJ conducted or funded must adhere. Specifically, it stated that (1) training must be consistent with the U.S. Constitution and DOJ values; (2) the content of training and training materials must be accurate, appropriately tailored, and focused; (3) trainers must be well qualified in the subject area and skilled in presenting it; (4) trainers must demonstrate the highest standards of professionalism; and (5) training must meet department standards.

Also in March 2012, the FBI published *The FBI's Guiding Principles Touchstone Document on Training*. This document is intended to be consistent with the March 2012 Deputy Attorney General guidance, but elaborates on each training principle outlined in the document. The FBI's guidance states that training must (1) conform to constitutional principles and adhere to the FBI's core values; (2) be tailored to the intended audience, focused to ensure message clarity, and supported with the

³⁰The Arab-Muslim Engagement Advisory Group was established to help identify more effective ways for DOJ to foster greater communication and collaboration, as well as a new level of respect and understanding, between law enforcement and Muslim and Arab-American communities. The group includes representatives from the Office of Legal Policy, the Civil Rights Division, the Office of Justice Policy, the Community Relations Service, the Executive Office for United States Attorneys, the National Security Division, the FBI, the Office of Community Oriented Policing Services, the Bureau of Prisons, and members of the Attorney General's Advisory Committee.

appropriate course materials; and (3) be reviewed, and trainers must be knowledgeable of applicable subject material.

DOJ officials also told us that the department's guiding principles are meant to memorialize department training standards and values and are the group's first step for ongoing work to ensure the quality of future counterterrorism and CVE-related training. Although developing these principles marks an important first step, we were unable to assess the extent to which they can help ensure the quality of CVE-related training moving forward because the review is ongoing and DOJ officials are in the process of planning additional efforts.

Conclusions

Providing high-quality and balanced CVE-related training is a difficult task given the complexity and sensitivities surrounding the phenomenon of violent extremism. However, misinformation about the threat and dynamics of radicalization to violence can harm security efforts by unnecessarily creating tensions with potential community partners. The CVE national strategy implementation plan commits the federal government, including DHS and DOJ, to supporting state and local partners in their efforts to prevent violent extremism by providing CVE-related training. By identifying and communicating CVE-related training topics, DOJ could better demonstrate the extent to which it is fulfilling departmental CVE-related responsibilities as established in the implementation plan for the CVE national strategy. In addition, by proactively soliciting feedback from participants in informal CVE-related training on a more consistent basis, FBI field offices and USAOs could more effectively obtain information on the strengths and weaknesses of their presentations and briefings, and thus better ensure their quality.

Recommendations for Executive Action

To better enable DOJ to demonstrate the extent to which it is fulfilling its CVE-related training responsibilities, we recommend that the Deputy Attorney General identify principal topics that encompass CVE-related training—including training that is directly related to CVE or that has ancillary benefits for CVE—and communicate the topics to DOJ components.

To obtain valuable information for determining the extent to which CVE-related programs are yielding the desired outcomes and complying with the CVE national strategy, we recommend that the Deputy Attorney General direct USAOs and the Director of the FBI's Office of Public Affairs direct FBI field offices to consider soliciting feedback more

consistently from participants in informal training, such as presentations and briefings, that covers the type of information addressed in the CVE national strategy.

Agency Comments and Our Evaluation

We provided a draft of the sensitive version of this report to DHS, DOJ, ODNI, and DOD for their review and comment. We received written comments from DHS and DOJ, which are reproduced in full in appendixes V and VI, respectively. DHS generally agreed with the findings in its comments, and DOJ agreed with one of the recommendations in this report, but disagreed with the other recommendation. ODNI and DOD did not provide written comments on the draft report. However, ODNI provided technical comments, as did DHS and DOJ, which we incorporated throughout the report as appropriate.

In its written comments, DHS noted that the report recognizes DHS's efforts to develop and improve the quality of CVE training and identified additional efforts that the department is taking to improve communication with its various CVE stakeholders and to implement the priorities outlined in its framework for vetting CVE training. For example, DHS stated that it will be hosting a CVE train-the-trainer workshop in September 2012, and identifying trainers on its online CVE training portal who meet the standards included in DHS's training guidance and best practices. DHS also stated that it remains committed to improving and expanding its development of CVE resources and providing information about those resources to state and local partners.

DOJ stated that it generally agrees with the recommendation that the Deputy Attorney General and the Director of FBI's Office of Public Affairs direct USAOs and FBI field offices to consider soliciting feedback more consistently from participants in informal training that covers the type of information addressed in the CVE national strategy. The department stated that it will develop a plan of action that describes how USAOs and FBI field offices will implement this recommendation. Developing such a plan should address the intent of our recommendations.

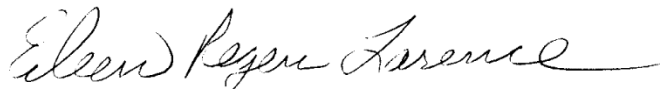
DOJ, however, disagreed with the recommendation that the Deputy Attorney General identify principal topics that encompass CVE-related training and communicate those topics to DOJ components. According to DOJ, the CVE national strategy implementation plan assigns DOJ, through its USAOs, primary responsibility for expanding the scope of engagement and outreach events and initiatives that may have direct or

indirect benefits for CVE; however, the plan does not assign the department primary responsibility for developing specific CVE-related training. We recognize that DOJ is not the lead agency for the subsection of the implementation plan related to the development of standardized CVE training; however, the CVE implementation plan nonetheless assigns DOJ as a lead or partner agency for other CVE training-related activities. For example, the implementation plan states that the FBI will lead the development of CVE-specific education modules and that DOJ will colead (1) the expansion of briefings about violent extremism for state and local law enforcement and government, and (2) the expansion of briefing efforts to raise community awareness about the threat of radicalization to violence. In addition, the implementation plan directs the FBI to develop a CVE Coordination Office, and according to the FBI, that office is in the process of developing CVE-related training. Given that DOJ has been identified as a lead or partner agency for several training related activities identified in the implementation plan, identifying CVE training topics could help DOJ demonstrate the extent to which it is fulfilling its responsibilities under the CVE national strategy. Identifying CVE training topics could also help the FBI determine what issues it should be addressing in the training that its CVE Coordination Office is developing, and assist the department in being able to publicly account for the CVE-related training that the department provides or funds.

DOJ also stated in its comments that the draft report recommended that DOJ redefine its cultural competency training and community outreach efforts (which may have benefits for CVE) as “CVE.” DOJ then stated that redefining these efforts as such would be imprecise and potentially counterproductive, and that labeling these efforts as CVE would suggest that they are driven by security efforts, when they are not. To clarify, the report does not include a recommendation that DOJ redefine or label its cultural competency training and community outreach efforts as CVE. Although we included these topics in the framework we used to identify potentially CVE-related training for the purpose of this review, the recommendation was that DOJ identify principal topics that encompass CVE-related training and communicate such topics to DOJ components. We defer to the department to determine which topics are appropriate to cover in its CVE-related training.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees. We will also send copies to the Secretary of Homeland Security, the Attorney General, the Secretary of Defense, and the Director of National Intelligence. In addition, this report will be made publicly available at no extra charge on the GAO 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 larencee@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix VII.



Eileen R. Larence
Director
Homeland Security and Justice

Appendix I: Scope and Methodology

This report answers the following questions:

1. To what extent have the Department of Homeland Security (DHS) and the Department of Justice (DOJ) identified and communicated topics that countering violent extremism-related (CVE-related) training addresses to their components and state and local partners?
2. What, if any, concerns have been raised by state and local partners who have participated in CVE-related training provided or funded by DHS and DOJ?
3. What actions, if any, have DHS and DOJ taken to improve the quality of CVE-related training?

To determine the extent to which DHS and DOJ identified and communicated topics that should be addressed by CVE-related training, we met with officials from both departments to discuss how they define CVE-related training, which departmental training programs were relevant to our review, and how the departments communicated principal CVE-related training topics to relevant components and state and local partners. We then analyzed this information to assess the extent to which the departments' efforts allow them to demonstrate fulfillment of their CVE-related training responsibilities under the CVE national strategy. We also met with officials from the Department of Defense (DOD) and Office of the Director of National Intelligence (ODNI) who possess knowledge about CVE-related training and who are involved in interagency efforts related to CVE. More specifically, we met with officials from the components and offices listed in table 3.

Table 3: Components and Offices Interviewed

DHS	Office of the Secretary, Counterterrorism Working Group Office for Civil Rights and Civil Liberties Office of Intelligence and Analysis (I&A) Federal Emergency Management Agency (FEMA) Federal Law Enforcement Training Center (FLETC) Science and Technology Directorate (S&T)
DOJ	Federal Bureau of Investigation (FBI) Counterterrorism Division Inspection Division Office of Public Affairs Training Division National Security Branch Bureau of Justice Assistance (BJA) Office of Community Oriented Policing Services (COPS) Executive Office for U.S. Attorneys (EOUSA) Community Relations Service (CRS) Office of the Deputy Attorney General
DOD	Combating Terrorism Center at West Point
ODNI	National Counterterrorism Center

Source: GAO.

To obtain additional views on CVE-related training provided or funded by DHS or DOJ, we interviewed representatives from nine state and local law enforcement agencies and law enforcement representative organizations involved with federal CVE-related training efforts. They included the Minneapolis Police Department, the Los Angeles Police Department, the Las Vegas Sheriff’s Department, the Arkansas State Police Program, the Dearborn Police Department, the National Sheriff’s Association, the Major City Chief’s Association, the International Association of Law Enforcement Intelligence Analysts, and the National Consortium for Advanced Policing. We selected these agencies and organizations based on their involvement with CVE-related training efforts and the extent to which they collaborate with DHS or DOJ on CVE-related training. While the views of these entities do not represent the views of all agencies and organizations involved in CVE-related training, these entities were able to offer helpful perspectives for the purpose of this review. We also interviewed individuals with expertise in CVE, such as academic researchers who have published on CVE-related topics and researchers from organizations that study CVE-related topics, to obtain their views on topics CVE-related training should address and identify

potential training programs to include in our review. They included individuals from the Georgetown University Prince Alwaleed Bin Talal Center for Muslim-Christian Understanding, the RAND Corporation, the Foundation for Defense of Democracies, the International Centre for the Study of Radicalisation, and the National Consortium for the Study of Terrorism and Responses to Terrorism.¹ We selected these individuals based on the depth of their experience with, and knowledge of, CVE; the relevance of their publications; referrals from other practitioners; and to develop a sample that represented various sectors (e.g., academic, advocacy, etc.). They provided valuable insight even though the perspectives they offered are not generalizable.

In addition, we obtained the views of state and local grantees regarding the clarity of guidance FEMA provides to recipients of grant funds that are eligible for CVE-related training by conducting a web-based survey of 51 training points of contact within state administrative agencies.² To help develop our questionnaire, we conducted pretests with officials from three state administrative agencies and made modifications to the questionnaire as necessary based on their input. In July 2012, we sent e-mails with links to our web-based questionnaire and unique login information to each member of our sample. Nonresponding state administrative agencies were sent additional e-mails, and we also made telephone calls to nonrespondents encouraging them to respond. Our survey closed at the end of July 2012. We received a total of 30 complete responses, for an overall response rate of 59 percent. To assess whether there are consistent differences between respondents and nonrespondents that might affect conclusions drawn based on our survey results, we examined the geographic regions and sizes of states of the state administrative agencies. We found that the state administrative agencies that responded to our survey come from a mix of different states in terms of size and region of the country. For example, state administrative agencies from some states with large populations, such as New York and Pennsylvania, responded to the survey, but state administrative agencies from some other states with large populations,

¹The National Consortium for the Study of Terrorism and Responses to Terrorism is an independent consortium funded in part by DHS S&T.

²The state administrative agencies that we surveyed are responsible for managing DHS grant awards to states and the District of Columbia that are eligible for CVE-related training and ensuring that grant recipients comply with grant requirements.

such as California and Texas, did not. As a result, the experiences of state administrative agencies from some of the larger states may not be captured in our survey results. Nevertheless, the survey results provide insights into the level of clarity about DHS CVE-related guidance for other grantees.

To obtain a better understanding of the departments' CVE-related training responsibilities, we requested information from DOJ and DHS on the approximate number and type of participants that attended training we determined was CVE-related and the estimated cost. We provide additional details on how we classified training as CVE-related below. We assessed the reliability of the training data provided by interviewing agency officials familiar with the data to learn more about the processes used to collect, record, and analyze the data. For example, we found that several training providers collected information on the number and type of participants through sign-in sheets. We used these data to approximate the dollar amount spent by agencies on CVE-related training in appendix III.³ As described above, we determined that the data were sufficiently reliable for showing general trends in attendance and spending, but some agencies either did not record participant data, and thus could not provide them; did not record participant figures and provided estimates of attendance based on the instructor's recall; or recorded participant figures, but not the participants' places of employment, so they could not specify how many of the attendees were from state and local versus federal entities. We noted these instances in our report.

Identifying CVE-Related Training

During our initial interviews with DHS and DOJ, officials expressed difficulty in responding to our request for CVE-related training materials, in part because agency officials were not clear on which training should be considered CVE-related. To facilitate our request for course materials for CVE-related training, we developed a framework to classify training as CVE-related based on our review and analysis of information from the following sources: (1) federal strategies related to violent extremism, such as *Empowering Local Partners to Prevent Violent Extremism in the United*

³We did not include the cost estimates for some of the training in appendix III because the FBI considers those estimates to be law enforcement sensitive.

*States*⁴ and its associated implementation plan;⁵ (2) DHS and DOJ plans, reports, or strategies that address CVE-related training topics such as DHS's CVE-related training Guidance and Best Practices; and (3) perspectives provided by individuals with CVE expertise. Specifically, we conducted a content analysis of our transcripts of interviews with experts and CVE-related documents to determine the current understanding of the content areas covered by CVE-related training and the knowledge state and local officials should possess or principles they should understand to effectively carry out CVE efforts. We then analyzed this information to identify similar themes and principles across the sources and grouped them together into three distinct content areas CVE-related training likely addresses:

1. Radicalization addresses approaches that are based on research and accurate information to understanding the threat radicalization poses, how individuals may become radicalized, how individuals seek to radicalize Americans (threat of violent extremist recruitment), behaviors exhibited by radicalized individuals, or what works to prevent radicalization that results in violence.
2. Cultural competency seeks to enhance state and local law enforcement's understanding of culture or religion, and civil rights and civil liberties, or their ability to distinguish, using information driven and standardized approaches, between violent extremism and legal behavior.
3. Community engagement addresses ways to build effective community partnerships, such as through outreach, and community capacity for the purpose of, among other things, mitigating threats posed by violent extremism.

We solicited feedback on this framework from DHS and DOJ. DHS Counterterrorism Working Group officials generally agreed with the content areas we identified, and we incorporated feedback the group provided, as appropriate. DOJ officials stated that they view the

⁴The White House, *Empowering Local Partners to Prevent Violent Extremism in the United States*, (Washington, D.C: August 2011), 1. The strategy defines violent extremists as individuals who support or commit ideologically motivated violence to further political goals.

⁵The White House, *Strategic Implementation Plan for Empowering Local Partners to Prevent Violent Extremism in the United States*, (Washington, D.C: December 2011).

framework as reasonable for the purpose of our review. For this review, we considered CVE-related training to include instruction, presentations, briefings, or related outreach efforts conducted, sponsored, promoted, or otherwise supported by DOJ, DHS, or a respective component, to help state, local, or tribal entities related to the three aforementioned content areas.

We asked DHS and DOJ to identify and provide all course materials for any courses that they provided or funded during fiscal years 2010 and 2011 through grant programs for state and local entities, including law enforcement officers and community members, assumed to be CVE-related based on GAO's framework. We focused generally on training provided in fiscal years 2010 and 2011 because "countering violent extremism" is a relatively nascent term. In addition, we focused on training provided to state and local entities because the CVE national strategy emphasizes the importance of providing CVE-related training to these entities. While the FBI identified its National Academy as providing training that could be considered CVE-related, it did not identify any of its other programs as germane to our review. However, complaint letters raised concerns about FBI training that was CVE-related according to our framework that was provided through two other FBI programs—the Citizens' Academy and the National Joint Terrorism Task Force. We assessed some of the training provided through these programs and determined the training to be CVE-related according to our framework. In addition, the FBI's internal review of counterterrorism training, which included the FBI programs within the scope of our review, assessed the training materials against criteria for CVE-related training, thereby suggesting that these programs may have provided training that was CVE-related. Accordingly, we requested course materials on these programs, as well as the Community Relations Executive Seminar Training Program, which is an abbreviated version of the Citizens' Academy.

We received approximately 290 presentations, briefings, and course materials from two components within DHS and four within DOJ. In some cases, DHS and DOJ offices provided us only with course abstracts or agendas instead of the full presentations or course materials because (1) they contracted the training with an outside provider and did not retain all of the associated training materials or (2) the training materials were particularly voluminous and, on the basis of discussions with the offices, we agreed that the course abstracts or agendas would enable us to sufficiently determine the relevancy of the training to our review. In those cases, we determined CVE-relevancy based on the agenda or abstract

alone. We reviewed these training materials to assess whether each of the individual courses, presentations, briefings, and other training-related activities undertaken or funded by DHS and DOJ agencies addressed one or more of the three content areas described above. If they addressed any of these content areas, we considered them CVE-related, even if the primary focus of the materials was not CVE-related. To ensure consistency in our analysis, two analysts independently reviewed the materials for each training and recorded their assessment of whether the training addressed each content area. Any discrepancies in the initial determinations were then discussed and reconciled.

Identifying Concerns about CVE-Related Training

To determine what concerns, if any, participants raised about CVE-related training, we reviewed course evaluations completed by participants of CVE-related training offered by DHS I&A, DHS Office for Civil Rights and Civil Liberties, DOJ BJA, and the FBI, and identified complaints or concerns about CVE-related training made formally in writing. We limited our analysis to training that was provided or funded by DHS or DOJ during fiscal years 2010 or 2011 and provided to a state or local entity (e.g., police department, community group, or fusion center).⁶ Two analysts independently reviewed 8,424 course evaluations from six training programs to consistently determine which ones included concerns or complaints. The analysts also assessed the nature of the concerns and complaints and assigned each complaint to one of three categories: (1) politically or culturally biased, (2) offensive, or (3) inaccurate. Where there were discrepancies between the analysts, they were resolved through supervisory review.

To identify formally submitted or documented complaints or concerns participants expressed, we asked DHS and DOJ to identify those submitted in writing to DHS or DOJ, or articulated to DHS or DOJ through other means but subsequently documented by the agency, from fiscal years 2010 through 2011. We also conducted keyword searches using LexisNexis and Google to identify concerns that were raised by either

⁶A fusion center is generally a collaborative effort of two or more agencies that provide resources, expertise, and information to the center with the goal of maximizing their ability to detect, prevent, investigate, and respond to criminal and terrorist activity. See Global Justice Information Sharing Initiative, *Fusion Center Guidelines, Developing and Sharing Information and Intelligence in a New Era, Guidelines for Establishing and Operating Fusion Centers at the Local, State, and Federal Levels—Law Enforcement Intelligence, Public Safety, and the Private Sector* (August 2006).

individuals or advocacy groups that were submitted in writing to DHS or DOJ. In addition, we interviewed representatives, including leaders, of select advocacy groups that raised concerns about CVE-related training to identify what concerns and complaints, if any, they submitted in writing to DHS or DOJ on behalf of training participants. The advocacy and civil liberties organizations we interviewed included the American Civil Liberties Union, the American-Arab Anti-Discrimination Committee, the Council on American Islamic Relations, and the Muslim Public Affairs Council. We selected these organizations based on their leadership in raising concerns we identified (e.g., by virtue of being the primary signatories) and upon the recommendation of other advocacy groups. These interviews also enabled us to confirm or obtain additional views on the formally documented complaints DHS or DOJ provided. Through these approaches, we identified a total of six letters of complaint regarding 18 alleged incidents of biased CVE and counterterrorism training that DHS or DOJ provided or funded during fiscal years 2010 and 2011. Given that the scope of this review is limited to CVE-related training provided to state and local officials and community members, and not training that is exclusively provided to federal officials, we determined that 7 of the alleged incidents described in five of the letters were relevant to this review. We also interviewed relevant DHS and DOJ officials to obtain their perspectives on the concerns raised in the written complaints and information on any actions agencies took in response to these incidents.

Identifying DHS and DOJ Efforts to Improve the Quality of CVE-Related Training

To address what actions, if any, DHS and DOJ have taken overall to improve the quality of CVE-related training, we interviewed DHS and DOJ officials responsible for providing or funding CVE-related training to inquire about any current or pending guidance, whether documented or undocumented, they adhere to when vetting training materials and instructors and other actions they have taken to ensure the quality of CVE-related training. We reviewed relevant DHS and DOJ documents including recently released guidance and best practices for training that DHS, DOJ, and the FBI developed. We also analyzed FBI and DOJ data from training reviews and information on how DHS and DOJ review and vet training curricula and instructors. Specifically, we analyzed the counterterrorism training materials that the FBI determined were inappropriate as a result of its internal review, which the FBI undertook to identify and purge potentially objectionable training materials. This analysis enabled us to better understand the review results with regard to training materials that were CVE-related under our framework, and provided context for the quality assurance steps FBI has taken in response to the review. To focus our analysis on training materials

included in the FBI's review that were CVE-related, one analyst assessed which of these training materials were CVE-related, according to our framework, and if the materials were CVE-related, the analyst entered the FBI's observations and additional data about that training into a data collection form. A second analyst then reviewed these results. When there was disagreement, the two reviewers discussed the material, reached agreement, and modified the entries as necessary to ensure concurrence regarding which of the training materials included in the FBI's review were germane to our review. The FBI considers the methodology it used to conduct its internal review and our analysis of the training materials that the FBI considered objectionable to be For Official Use Only; therefore, we did not include that information in this report.

In addition, we conducted a site visit in San Diego, California, in January 2012, where DHS hosted a pilot of a CVE-related course under development. During the site visit, we observed the pilot training, and interviewed DHS officials who were sponsoring the training and local agencies that had developed and delivered the course curriculum. On the basis of the information we collected, we evaluated DHS's adherence to its own CVE-related training guidance. We also assessed DHS and DOJ guidance and actions related to guidance provided by departmental leadership, such as DOJ training guidance issued to its components.

We conducted this performance audit from October 2011 through October 2012 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: CVE-Related Training the Departments of Homeland Security and Justice Are Developing

DHS is currently working with its components and relevant state and local entities to develop and implement CVE-focused training for state and local law enforcement officers, state police academy recruits, correctional facility officers, and new federal law enforcement officers. DHS's Principal Deputy Counterterrorism Coordinator, who heads the department's CVE efforts, has testified that developing CVE-related training is a priority for the department because inappropriate or inaccurate training undermines community partnerships and negatively affects efforts of law enforcement to identify legitimate behaviors and indicators of violent extremism.¹ DHS has determined that CVE-related training should address: violent extremism (e.g., the threat it poses), cultural demystification (e.g., education on culture and religion), community partnerships (e.g., how to build them), and community policing efforts (e.g., how to apply community policing efforts to CVE). Accordingly, the DHS Counterterrorism Working Group, which is overseen by the Principal Deputy Counterterrorism Coordinator, is developing training that addresses these topics. These trainings include the following:

- A continuing education CVE curriculum for frontline and executive state and local law enforcement that DHS is developing with the Los Angeles Police Department, Major Cities Chiefs Association (MCC), and the National Consortium for Advanced Policing (NCAP).² DHS hosted a first pilot for this course in San Diego, California, in January 2012 that 45 state and local law enforcement officials attended. The pilot consisted of 3 days of classroom instruction and student participation activities. According to Counterterrorism Working Group officials, DHS held a second pilot in the National Capital Region in July 2012, and a third pilot in Minneapolis, Minnesota, in August 2012. In July 2012, DHS also presented the curriculum at a CVE conference it hosted in Washington, D.C., and according to Counterterrorism

¹*The American Muslim Response to Hearings on Radicalization within their Community, Before the Committee on Homeland Security, 112th Cong. 7 (2012)* (statement of John Cohen, Principal Deputy Counterterrorism Coordinator and Senior Advisor to the Secretary of Homeland Security).

²MCC is a professional association that is to provide a forum for executives to share ideas, experiences, and strategies for addressing the challenges of policing large urban communities. MCC membership is composed of police chiefs and sheriffs of the 63 largest law enforcement agencies in the United States and 7 largest in Canada. The National Consortium for Advanced Policing brings together professionals with backgrounds in law enforcement, academia, intelligence, government service, and homeland security to provide law enforcement training and technical assistance programs.

- Working Group officials, the department is working to enhance the curriculum based on feedback that conference attendees provided. MCC has passed a motion to adopt the curriculum, which DHS aims to implement in collaboration with state and local partners in 2013.
- CVE-related training modules for state police academies, which DHS is developing in collaboration with the International Association of Chiefs of Police (IACP).³ These training modules will be 1 to 2 hours in length, and are intended for police recruits. DHS plans for police academies to introduce the modules into their training and to make them available online for police recruits by the end of 2012.
 - A CVE awareness training for correctional facility, probation, and patrol officers at the state and local levels that DHS is working to develop in collaboration with the Bureau of Prisons, the FBI National Joint Terrorism Task Force, and the Interagency Threat Assessment Coordination Group.⁴ Counterterrorism Working Group officials reported that DHS completed pilots for this training in Maryland in March 2012 and in California in July 2012. FEMA is also developing a curriculum for rural correctional facility management.

Further, according to DHS officials, the Federal Law Enforcement Training Center has finalized a CVE-related training course that it integrated into its existing training for recruits. In February 2012, DHS hosted a symposium on the curriculum, and as of July 2012, FLETC had taught the curriculum to about 190 students. In addition, according to DHS officials, FLETC is also in the process of integrating aspects of the DHS Office for Civil Rights and Civil Liberty's cultural competency training, which is described in detail in appendix III, into all new CVE curriculum and training efforts.

Within DOJ, the FBI is also developing CVE-related training. The CVE national strategy implementation plan tasks FBI with establishing a CVE

³IACP is a nonprofit membership organization of police executives, with over 20,000 members in over 100 countries. IACP's leadership consists of the operating chief executives of international, federal, state, and local agencies of all sizes.

⁴The FBI National Joint Terrorism Task Force, among other things, coordinates information and intelligence gathering initiatives and synthesizes terrorism intelligence for use by FBI entities, as well as other agencies in the Intelligence Community. The Interagency Threat Assessment Coordination Group was established at the National Counterterrorism Center to help DHS, the FBI, and other agencies produce federally coordinated, terrorism-related information products tailored to the needs of state, local, tribal, and territorial governments and private sector partners.

Coordination Office that will, as part of its activities, coordinate with the National Task Force on CVE-specific education and awareness modules.⁵ According to FBI officials, the FBI established a CVE office in January 2012, and as of August 2012, had assigned staff to the office and was in the process of developing CVE-related training modules. In particular, the CVE Office developed and presented a CVE-related training module to FBI public affairs specialists and community outreach coordinators and specialists in FBI field offices from April through August, 2012, according to FBI officials. FBI officials also reported that the CVE Office is collaborating with the FBI Counterterrorism Division to develop a CVE-related training module for FBI special agents and mid- and senior-level managers that it plans to complete in December 2012 and implement in early 2013.

⁵The National Task Force, led by DOJ and DHS, was established in November 2010 to help coordinate community engagement at the national level. It includes all departments and agencies involved in relevant community engagement efforts and focuses on compiling local, national, and international best practices and disseminating these to the field. The task force is also responsible for connecting field-based federal components to the full range of U.S. government officials involved in community engagement to maximize partnerships, coordination, and resource sharing.

Appendix III: CVE-Related Training Provided or Funded during Fiscal Years 2010 and 2011

DOJ and DHS components provided training that was CVE-related according to our framework to more than 28,000 state and local entities, including law enforcement officials, fusion center personnel, and community members, during fiscal years 2010 and 2011. That is, DOJ and DHS components provided training, including courses, briefings, presentations, and workshops, that addressed one or more of the three CVE-related training topical areas we identified: (1) the phenomenon of violent extremism and the threat posed by radicalization that leads to violence; (2) cultural competency and how to distinguish between criminal and constitutionally protected cultural and religious behaviors; and (3) how to build effective community partnerships to, among other things, mitigate threats posed by violent extremism.¹ The majority of these trainings did not have the term “CVE” in their titles, a fact that DOJ and DHS officials attributed to CVE being a relatively new concept, or that the trainings had been developed for purposes other than CVE. Nonetheless, they provided some instruction on at least one of the three CVE-related training topics we identified, and thus are considered CVE-related for the purpose of this review. Although the CVE-related trainings that DOJ and DHS provided collectively addressed all three CVE-related training topics, the trainings more frequently addressed the phenomenon of violent extremism and cultural competency than community engagement. The specific topics addressed by each training DOJ and DHS components provided during fiscal years 2010 and 2011 are described in the tables that follow. In addition, the DOJ grant-funded State and Local Anti-Terrorism Training (SLATT) Program provided CVE-related training to approximately 11,000 state and local law enforcement officials.

¹For information about this framework and how we identified these topical areas, see appendix I.

**CVE-Related Training That
DOJ Components Provided**

Within DOJ, the FBI, CRS, and U.S. Attorneys' Offices (USAO) provided CVE-related training directly to state and local entities during fiscal years 2010 and 2011.² In total, these entities provided CVE-related training to more than 15,000 state and local law enforcement and community members. More specifically, the FBI National Academy, the FBI National Joint Terrorism Task Force (NJTTF) Program, select FBI field offices, CRS, and about half of USAOs (48 of 93 offices) provided CVE-related training to law enforcement. In addition, the FBI's Citizens' Academy and Community Relations Executive Seminar Training (CREST) outreach programs provided CVE-related training to community members. Tables 4, 5, and 6 provide more detailed information on these programs and trainings.

²The FBI's mission is to protect and defend the United States against terrorist and foreign intelligence threats, uphold and enforce the criminal laws of the United States, and provide leadership and criminal justice services to agencies and partners. CRS is DOJ's DOJ's "peacemaker" for community conflicts and tensions arising from differences of race, color, and national origin. It is dedicated to assisting state and local units of government, private and public organizations, and community groups with preventing and resolving racial and ethnic tensions, incidents, and civil disorders, and in restoring racial stability and harmony. According to DOJ, pursuant to the Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act, CRS also works with communities to develop strategies to prevent and respond more effectively to alleged violent hate crimes committed on the basis of race, color, national origin, gender, gender identity, sexual orientation, religion, or disability. See generally Pub. L. No. 111-84, Div. E, 123 Stat. 2190, 2835 (2009). See also 18 U.S.C. § 249.

Appendix III: CVE-Related Training Provided or Funded during Fiscal Years 2010 and 2011

Table 4: CVE-Related Training FBI Provided to State and Local Entities in Fiscal Years 2010 and 2011

Training program and description	Audience	CVE content areas addressed	Approximate number of state and local participants
<p>National Academy The FBI National Academy provides undergraduate and graduate courses through 10-week training sessions on a range of topics, such as terrorism, law, and leadership development. Participation is by invitation only, and the academy offers four sessions of courses each year. Three National Academy courses were provided in fiscal years 2010 and 2011 that were CVE-related:</p>	Mid- to senior-level federal, state, local, and international law enforcement officials.	Violent radicalization Cultural competency Community engagement	Total across three trainings described below: 323
<i>Legal Aspects of Policing in Today's War on Terrorism</i> focuses on policing during the current war on terrorism, and is intended to provide officers with a comprehensive understanding of judicial and legislative trends affecting policing and policy development. It also emphasizes the importance of protecting civil liberties.		Cultural competency	78
<i>Leadership in Counterterrorism</i> aims to, among other things, familiarize officers with various types of U.S. domestic terrorist groups and educate them on the historical development of violent Islamic extremism. This course is taught in a symposium format and includes sessions on Middle Eastern culture and basic Islamic beliefs. ^a		Violent radicalization Cultural competency	83
<i>Understanding Terrorism: Mindset, Methodology, and Response</i> aims to provide students with an understanding of government responses to domestic terrorism. Topics addressed by this course include, among other things, definitions for terrorism and the mindset and grievances of terrorists, including violent extremists.		Violent radicalization Cultural competency Community engagement	162
<p>NJTTF Program The FBI has more than 100 Joint Terrorism Task Forces (JTTF) across the United States, in which more than 4,000 representatives from state, local, and federal agencies work together to combat terrorism at a regional level. The NJTTF is responsible for managing the JTTF program and coordinating the efforts of regional task forces. It also provides training to task force officers and members. Three NJTTF courses were provided in fiscal years 2010 and 2011 that were CVE-related:</p>	State and local task force officers; campus liaison agents, who serve as an FBI resource and point of contact for academic institutions; and FBI personnel.	Violent radicalization Cultural competency Community engagement	Total across three trainings described below: up to 1,393
<i>Campus Liaison Agents Conference</i> —2-day conference intended to, among other things, increase awareness and provide insight into the detection and deterrence of radicalization and recruitment of college students.	Campus liaison agents, state and local officials, and other federal employees.	Violent radicalization	43
<i>JTTF Task Force Officer Orientation and Operations Course</i> —course that the Combating Terrorism Center (CTC) at West Point, DHS, and the FBI taught that included a 4-hour block of instruction on CVE that addressed topics including Islamic culture, radicalization, and Islamism. ^b	State and local task force officers and members.	Violent radicalization Cultural competency Community engagement	672

Appendix III: CVE-Related Training Provided or Funded during Fiscal Years 2010 and 2011

Training program and description	Audience	CVE content areas addressed	Approximate number of state and local participants
<i>International Terrorism Origins, Ideologies, and Methods Regional Courses</i> —courses that CTC and the FBI taught to increase the knowledge base of counterterrorism practitioners. The specific topics covered in each course varied, but examples of topics they addressed included the origins of Islam, the diversity of cultures among Muslim Americans, the process by which individuals may be radicalized for jihad, and how extremists use the Internet for recruitment purposes.	FBI personnel working on counterterrorism issues and task force members.	Violent radicalization Cultural competency	up to 678 ^c
Citizens' Academy^d Ten-session program FBI field offices teach one or two times per year that provides business, religious, civil, and community leaders with an overview of the FBI. Each field office develops its own curriculum addressing a range of topics, which can include a session on counterterrorism that addresses CVE topics. GAO reviewed the topics addressed at Citizens' Academy programs provided by 42 of FBI's 56 field offices in fiscal years 2010 and 2011, and these offices provided a total of 61 presentations related to counterterrorism. FBI was able to provide GAO with 56 of these presentations, 35 of which were CVE-related. For example, these presentations addressed various types of violent extremists and the threats they pose, as well as FBI tenets for ensuring civil rights and civil liberties when undertaking investigations. ^e	Business, religious, civil, and community leaders.	Violent radicalization Cultural competency	945
CREST CREST is a 3- to 4-hour, more focused version of the Citizens' Academy that FBI field offices teach and conducted in partnership with a specific community group or organization. The topical focus of CREST sessions is customized to meet the needs of each organization. GAO's review of CREST agendas from 17 FBI field offices revealed that they provided a total of eight CREST sessions that related to counterterrorism during fiscal years 2010 and 2011. FBI was able to provide GAO with four of these presentations, all of which were CVE-related because they, for example, educated participants about various types of violent extremists and extremist groups.	Community group and organization members.	Violent radicalization Community engagement	165

Source: GAO analysis of DOJ information.

Notes: Although this table identifies the CVE topics each training addressed, this is not meant to suggest CVE was their explicit or primary focus. Some of the trainings described in the table may have also addressed topics unrelated to CVE, which are not identified because they are not the focus of this review. In addition, this table excludes any training these programs provided that was not CVE-related according to our framework. The table also excludes data on training costs and information on additional trainings that FBI field offices provided that were CVE-related according to our framework because the FBI considered this information to be law enforcement sensitive.

^aThis course is a combined effort of the FBI and the SLATT Program, which is described in table 8, and SLATT program instructors teach some National Academy course modules. To avoid double counting participants and costs, training SLATT provided at the National Academy is not included in the SLATT data presented in table 8.

^bCTC is part of the Department of Defense. It directs multiple graduate-level seminars on terrorism and counterterrorism and directs counterterrorism educational programs for partner government agencies, among other things.

^cThis figure includes all course participants because the FBI could not provide data specific to state and local attendees. According to the FBI, even though it collects the names and positions of participants, it does not collect the names of the organizations for which they work, and the FBI would need this information to specify the number of state and local participants.

^dAccording to the FBI, the mission of its Community Outreach Program, of which the Citizens' Academy and CREST programs are a part, is to enhance public trust and confidence in the FBI in order to enlist the cooperation and support of the public in the common interest of fighting terrorism and other criminal activity. Even though, according to the FBI, its outreach programs may produce a "CVE impact" on community partners by helping to build trust and empower communities to identify problems on their own, the Citizens' Academy is a community relations outreach effort that is not undertaken specifically for CVE and no formal CVE-related training curriculum is provided within the Citizens' Academy sessions. Although we agree that the FBI's outreach programs may have a CVE impact, according to our framework for CVE-related training, instruction provided through the Citizens' Academy in fiscal years 2010 and 2011 also constituted CVE-related training. Accordingly, we are categorizing it as CVE-related in our analysis.

^eAccording to the FBI, field offices could not provide presentation materials in some instances because the presenter no longer has a copy of them, the presenter retired or transferred away from the field office, or the field office could otherwise not locate the presentation materials.

Although we determined that CRS provided CVE-related training according to our framework, CRS officials emphasized that the service's mission does not include any national security, counterterrorism, or CVE-related training efforts. CRS works with communities to help address tension associated with allegations of discrimination on the basis of race, color, or national origin. CRS also works with communities to develop strategies to prevent and respond more effectively to alleged violent hate crimes on the basis of race, color, national origin, gender, gender identity, sexual orientation, religion, or disability. According to CRS officials, through its work preventing hate crimes, CRS helps develop relationships among Arab, Muslim, and Sikh communities who may be targeted for hate violence by violent extremists, including supremacists, and other community members, as well as local government and law enforcement officials. As a result, CRS does not conduct activities or programs with the express goal of CVE, but recognizes that its ability to help promote dialogue and develop strong relationships to create a sense of inclusion in communities may have ancillary CVE benefits in preventing violent extremism.

**Appendix III: CVE-Related Training Provided or
Funded during Fiscal Years 2010 and 2011**

Table 5: CVE-Related Training CRS Provided to State and Local Entities in Fiscal Years 2010 and 2011

Description	Audience	CVE content areas addressed	Approximate number of state and local participants	Estimated cost
<p><i>Arab, Muslim, and Sikh Cultural Awareness Course</i> Course provided to enhance law enforcement officers' understanding of and sensitivity to cultural and religious practices of Arab, Muslim, and Sikh American communities. This course is 2-4 hours in duration and is generally provided through two modules, one of which focuses on the cultural and religious practices of Arab-Americans and Muslims and the other of which focuses on cultural and religious practices of Sikhs.</p>	State and local law enforcement officers	Cultural competency Community engagement	2,765 ^a	\$7,900 ^b

Source: GAO analysis of DOJ information.

^aCRS does not systematically collect or use the number of attendees at CRS-delivered training as a data reference point or reporting requirement. CRS estimated the number of participants based on CRS staffs' observations at the time they delivered the course. While some staff recorded the information in their individual office files, others relied upon their memory to provide the data.

^bThis estimate includes expenses CRS instructors who traveled to provide instruction incurred. It does not include the cost of instructors' time or the cost to develop the course. Although CRS paid a contractor to develop the course content in 2003 that was delivered in fiscal years 2010 and 2011, CRS cannot provide information on the cost of course development because CRS disposed of this information according to its record retention schedule.

Table 6: CVE-Related Training USAOs Provided to State and Local Entities in Fiscal Years 2010 and 2011

Training description	Audience	CVE content areas addressed	Approximate number of participants
<p>DOJ has 93 USAOs across the United States, 48 (52%) of which provided, cohosted, or facilitated approximately 100 CVE-related trainings to state and local entities during fiscal years 2010 and 2011.^a According to EOUSA officials, these trainings were generally provided through the Antiterrorism Advisory Council (ATAC) program. Each USAO has an ATAC, which includes a crosssection of federal, state, and local law enforcement; first responders; and private sector security personnel who work together to coordinate counterterrorism efforts in their communities by, among other things, conducting trainings. Each USAO has an ATAC coordinator who is responsible for initiating training programs, and law enforcement coordinators within offices may also help facilitate trainings in their districts. CVE-related trainings may be offered as stand-alone courses or at workshops or conferences, and may be provided by a USAO representative, a private contractor, or in coordination with another federal office or program, such as FBI JTTF, SLATT (described below), the Office for Civil Rights and Civil Liberties Institute (described below), CRS, National Counterterrorism Center (NCTC), or CTC.^b</p> <p>Of the 100 CVE-related trainings, about a third—34—were facilitated by USAOs but provided by SLATT, CRS, Office for Civil Rights and Civil Liberties, NCTC, or CTC, as follows:</p> <ul style="list-style-type: none"> • Twenty-one were provided by SLATT. • Five were provided by CRS. • Four were provided by the Office for Civil Rights and Civil Liberties. • Four were provided by NCTC.^c • Two were provided by CTC.^d 	<p>Federal, state, and local law enforcement officers</p>	<p>USAOs provided or facilitated 66 CVE-related trainings in fiscal years 2010 and 2011 excluding trainings provided by CRS, SLATT, the Office for Civil Rights and Civil Liberties Institute, CTC, and NCTC. Of these 66 trainings:</p> <ul style="list-style-type: none"> • 60 addressed violent radicalization, • 43 addressed cultural competency, and • 8 addressed community engagement.^e 	<p>7,700^f</p>
<p>USAO representatives or a third party provided the remaining two-thirds of CVE-related training at events that USAOs hosted or cohosted. For example:</p>			
<ul style="list-style-type: none"> • Two USAOs cosponsored a conference on counterterrorism in 2010 and 2011 with FBI and the state in which their districts are located. The 2010 conference included a presentation on terrorism recruitment that addressed the radicalization of American-based Somalis, and the 2011 conference included a presentation on the ideologies of domestic terrorists, including violent extremists. • One USAO hosted a 3-hour symposium on homegrown terrorism that provided state and local law enforcement professionals with information on how to recognize and protect against the threat it poses. For example, during the symposium, a presenter provided a review of how terrorists use the Internet to recruit jihadists and case studies of U.S. citizens that were recruited. • Another USAO sponsored a conference on global terrorism in 2010 and 2011. The 2010 conference included a presentation on threats posed by radicalization and Islamic extremism in the United States, and the 2011 conference included a presentation made by an FBI agent and a former defendant charged with providing material support to al Qaeda that addressed radicalization. 			

Source: GAO analysis of information provided by EOUSA and USAOs.

Notes: Even though this table identifies the CVE topics USAO trainings addressed, this is not meant to suggest CVE was their explicit or primary focus. Some of the trainings described in the table also addressed topics unrelated to CVE, which are not identified because they are not the focus of this review. In addition, even though USAOs provided us with the total cost for the trainings that they provided or sponsored, they were not able to provide the cost of the portion of the course that was CVE-related. As a result, according to the Executive Office for United States Attorneys, the estimates provided are likely significantly larger than should be attributed to CVE-related training. Accordingly, we are not including them in this table.

^aOf the 93 USAOs, 50 indicated that they may have provided training that was CVE-related according to our framework. Upon reviewing training materials from these 50 offices, we determined that 48 offices provided CVE-related training according to our framework.

^bNCTC is an additional federal entity that provided CVE-related training to state and local entities during fiscal years 2010 and 2011. We are not presenting detailed information on these trainings given that the focus of this review is on DOJ and DHS. In addition to CVE-related training described in this report, NCTC's Radicalization and Extremist Messages Group provided briefings on 25 occasions to groups of federal, state, and local law enforcement officials during fiscal years 2010 and 2011 on the dynamics of radicalization. In addition, NCTC reported that its Directorate of Strategic Operational Planning CVE Group provided an awareness briefing to community leaders, educators, and others on more than 15 occasions. The purpose of the briefings was to share information on the threat of terrorist recruitment in the United States, listen to the perspectives and insights of community members, and foster discussion on ways the federal government and communities can work together to protect youth and at-risk individuals from extremist radicalization efforts.

^cAccording to NCTC officials, the center provided two additional briefings to USAO ATACs.

^dTrainings sum to 36 rather than 34 because two federal providers contributed to 2 of the trainings.

^eNumbers do not sum to 66 because some trainings addressed multiple content areas.

^fThe number of approximate participants is based on participant information provided by USAOs. It excludes participants in trainings organized by USAOs but provided by other federal entities (e.g., the Office for Civil Rights and Civil Liberties) to avoid double counting participants that are reported in other tables in this appendix. In some instances, USAOs were able to report the total number of participants, but not the number of total participants who were state and local versus federal officials. In addition, in some instances USAOs reported attendance by "other" officials, but did not specify the officials' affiliations. Further, in select instances, USAOs reported a range of participants. To balance the potential impact of a differential over- or undercount on the estimates of the total number of participants, our estimates (1) include federal officials where they were grouped together with state and local officials (which may lead to overestimation), and (2) exclude "other" participants and use the low end of participant ranges (which may lead to underestimation).

CVE-Related Training That DHS Components Provided

Within DHS, the Office for Civil Rights and Civil Liberties Institute and I&A provided CVE-related training to approximately 3,410 state and local intelligence and law enforcement officials during fiscal years 2010 and 2011.³ This training consisted of two classroom-based courses that the Office for Civil Rights and Civil Liberties Institute provided on about 40 occasions; one CVE-focused workshop that the I&A State and Local

³The Office for Civil Rights and Civil Liberties Institute provides training on issues at the intersection of homeland security and civil rights and civil liberties. I&A's mission is to provide intelligence and information needed to keep the homeland safe, secure, and resilient, and the Homegrown Violent Extremism Branch is responsible for carrying out this mission as it pertains to homegrown violent extremism.

Appendix III: CVE-Related Training Provided or Funded during Fiscal Years 2010 and 2011

Program Office hosted; and 17 briefings that the I&A Homegrown Violent Extremism Branch (HVEB) provided in coordination with the FBI and NCTC at fusion centers and fusion center conferences. Table 7 provides more detailed information on each of these trainings.

Table 7: CVE-Related Training DHS Provided to State and Local Entities in Fiscal Years 2010 and 2011

DHS entity	Training/description	Audience (state, local, and other participants)	CVE topical areas addressed	Approximate number of state and local participants	Estimated cost
Office for Civil Rights and Civil Liberties Institute	State and Major Urban Area Fusion Center Training, Cultural Tactics for Intelligence Professionals module: 1-hour module that is part of a broader training course focused on, among other things, the diversity of the threat violent extremists pose and building cultural competency, including dispelling misconceptions about Islam.	Fusion center personnel	Violent radicalization Cultural competency Community engagement	736	\$274,300
	CVE through Community Partnerships course: 4 to 8-hour course focused on the threat posed by violent extremism; building cultural competency, including dispelling misconceptions about Islam; and the role of communities in CVE, including contributions of Muslim communities in thwarting violent extremist plots and tips for interacting with community members.	Federal, state, local, and international law enforcement officers	Violent radicalization Cultural competency Community engagement	1,021	\$444,800
	CVE through Community Partnerships conference presentations: abbreviated version of CVE through Community Partnerships course curriculum presented at law enforcement conferences.	Federal, state and local law enforcement officers	Violent radicalization Cultural competency Community engagement	585	\$108,500
I&A HVEB and State and Local Program Office	Fusion center briefings: briefings provided by HVEB in collaboration with the FBI and NCTC to build awareness of the threat posed by, and indicators of, violent extremism, and to improve sharing of information related to violent extremism among federal, state, and local partners.	Fusion center personnel and other state and local law enforcement and intelligence professionals	Violent radicalization	930 ^a	\$24,000 ^b
	National CVE Workshop: 2-day workshop led by the State and Local Program Office to build understanding of violent extremism and share best practices to understand the phenomenon of violent extremism in the United States, build awareness of the violent extremism threat to local communities, and support fusion centers to develop better intelligence products to support law enforcement customers.	Fusion center personnel, intelligence commanders, and other federal partners	Violent radicalization Community engagement	138	\$108,500 ^c
Total				3,410	\$960,100

Source: GAO analysis of DHS information.

Note: Even though this table identifies the CVE topics that each training addressed, this is not meant to suggest CVE was their explicit or primary focus. Some of the trainings described in the table may have also addressed topics unrelated to CVE, which are not identified because they are not the focus of this review. In addition, I&A officials do not identify I&A training presented in this table as CVE-related because I&A's focus is on describing threats from an intelligence perspective and not on countering the phenomenon of violent extremism. Nonetheless, as the HVEB trainings described above address the topics of violent radicalization and community engagement, they constitute CVE-related training as conceived by our framework, and thus constitute CVE-related training for the purpose of our review.

^aI&A provided the briefings at various fusion centers, and the approximate number of participants reflects the sum of estimated attendees at all of the briefings. I&A did not maintain records on the number of participants in the briefings because, according to I&A officials, I&A was generally invited to speak by fusion centers and did not sponsor the event. Accordingly, participant data are based on the recollection of I&A participants.

^bI&A fusion center briefing costs exclude money spent on local travel. In addition to costs incurred by I&A, the FBI spent approximately \$8,800 to attend and provide these fusion center briefings.

^cThe FBI spent approximately \$6,300 to attend, and provide briefings at, the National CVE Workshop.

DOJ and DHS Grant Programs That Provided Funding That Could Be Used for CVE-Related Training

DOJ and DHS also administered four grant programs during fiscal years 2010 and 2011 that provided funding for which CVE-related training was an eligible expense: (1) the DOJ Community Policing Development (CPD) Program, (2) the DOJ Edward Byrne Memorial Justice Assistance Grant (JAG) Program, (3) the DHS Homeland Security Grant Program (HSGP), and (4) the DOJ SLATT Program. We reviewed grant documentation for CPD grant projects that DOJ identified as potentially CVE-related and determined that they were not used to pay for training that was CVE-related according to our framework. Information DHS and DOJ collect on grant projects funded through the HSGP and JAG programs suggests that minimal, if any, funds from these programs were used for CVE-related training purposes; however, the level of detail in the information the departments collect from HSGP and JAG grantees is not sufficient to reliably and conclusively make this determination. In fiscal years 2010 and 2011, SLATT provided CVE-related training to approximately 11,000 state and local officials. Additional details regarding this training are provided in table 8.

Appendix III: CVE-Related Training Provided or Funded during Fiscal Years 2010 and 2011

Table 8: CVE-Related Training That the SLATT Program Provided in Fiscal Years 2010 and 2011

Description	Audience	CVE topical areas addressed	Approximate number of state, local, and tribal participants	Estimated cost
<p>SLATT provides funding to a single grantee through a cooperative agreement to provide training in detecting, investigating, and prosecuting extremist criminal activity, including activity that is inspired by international events. SLATT training consists of about 26 modules that address a range of topics, such as Arabic culture and Islam, violent criminal extremism in the prison system, and radicalization on college campuses. Training is provided through either a 3.5-day course or through workshops that are 1 or 2 days in duration. The content is tailored to the particular needs of the officers to who attend.</p>	<p>State, local, and tribal law enforcement personnel</p>	<p>Among the 19 CVE-related SLATT modules,</p> <ul style="list-style-type: none"> • 16 addressed violent radicalization, • 14 addressed cultural competency, and • 6 addressed community engagement.^a 	<p>11,000^b</p>	<p>\$4,615,100^c</p>

Source: GAO analysis of Office of Justice Programs information.

Notes: Although this table identifies the CVE topics that SLATT modules addressed, this is not meant to suggest that CVE was the explicit or primary focus of each module. Some SLATT modules also addressed topics unrelated to CVE, which are not identified because they are not the focus of this review.

^aNumbers do not sum to 19 because some trainings addressed multiple content areas.

^bWe assessed 19 of the 26 SLATT training modules as CVE-related. The number of participants reflects total state, local, and tribal attendees at courses in which one or more of the 19 modules were taught. SLATT provided training to approximately 900 additional participants that was not CVE-related according to our framework.

^cSLATT training costs include expenses associated with delivering all facets of the SLATT Program, such as research, administration, and production of materials. They also include the cost of delivering the 7 training modules that are not-CVE as conceptualized by our review. According to the SLATT program officials, although the program currently tracks the cost of providing specific trainings, it did not track their individual costs during fiscal years 2010 and 2011. In addition, according to SLATT officials, is difficult to estimate the costs associated with providing the CVE-related portion of a training that covers both CVE and other topics.

Appendix IV: Types of Concerns Raised about DHS and DOJ CVE-Related Training

Table 9 presents a summary of the 77 state and local participant concerns that we identified during our review of course evaluation forms that DHS and DOJ provided to us.¹

Table 9: Types of Concerns State and Local Participants Raised about DHS and DOJ CVE-Related Training That Occurred during Fiscal Years 2010 and 2011

Training provider ^a	Approximate total number of state and local participants in CVE-related trainings (rounded to the nearest hundred) ^b	Number of participants that provided feedback ^c	Number of participants that raised concerns		
			Politically or culturally biased	Offensive	Inaccurate
DOJ SLATT	11,000	5,005	17	1	4
FBI National Academy	300	248	4	2	1
FBI Citizens' Academy ^d	900	121	0	0	0
FBI NJTTF Program	1,400	1,053	26	5	3
DOJ USAOs	7,700	1,185	3	1	2
DHS I&A	1,100	28	0	0	0
DHS Office for Civil Rights and Civil Liberties Institute	2,300	784	4	3	1
Total	24,700	8,424	54	12	11

Source: GAO analysis of DHS and DOJ participant evaluations.

^aFor more information about the training these programs provided, see appendix III.

^bThe total number of participants for each program is the sum of all state and local participants in training that was CVE-related according to our framework, and the programs may have provided additional training to participants that was not CVE-related. Participants may be counted more than once if they attended multiple CVE-related training courses.

^cSome programs solicited participant feedback on only select courses. This table excludes CVE-related training provided by FBI field offices through the Community Relations Executive Seminar Training Program and other initiatives on which the offices did not solicit participant feedback. It also excludes the Community Relations Service, which reported that it has used evaluations in the past, but too few participants returned course evaluations, thus limiting the service's ability to analyze them effectively. According to Community Relations Service officials, the service is in the process of instituting new procedures for distributing, collecting, and reviewing course evaluations that it expects will improve the number of evaluations returned.

^dThe FBI provided us with information on trainings provided through the Citizens' Academy by 42 of the FBI's 56 field offices. Accordingly, the total number of Citizens' Academy participants excludes training provided by the 14 remaining field offices.

¹We did not independently assess the validity of the concerns raised by participants. Therefore, the data presented represent only the participants' perspectives.

Appendix V: Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, D.C. 20528



September 17, 2012

Eileen R. Larence
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Draft Report GAO-12-952SU, "COUNTERING VIOLENT EXTREMISM:
Additional Actions Could Strengthen Training Efforts"

Dear Ms. Larence:

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

The Department is pleased to note the report positively recognizes DHS's efforts to develop Countering Violent Extremism (CVE) training and to communicate training topics to components and state and local partners. DHS is also appreciative that the report acknowledges Department efforts to disseminate training guidance and best practices to help improve the quality of CVE training.

DHS continues to improve communication efforts with its various CVE stakeholders. For example, the Department has undertaken efforts to reach out to more than 100 State Administrative Agency Heads and Homeland Security Advisors from over 30 states in order to clarify what topics should be addressed in CVE-related training. Additionally, the Department is continuing to work with grantees to ensure understanding of our CVE efforts and high-quality training. For example, DHS is hosting a CVE Train-the-Trainer workshop in San Diego, California on September 27-28, 2012 for trainers from across the country. Last month, DHS also launched a new CVE Training Webportal for a select group of law enforcement training practitioners. We plan to expand access to this Webportal, containing more than 160 CVE training materials, to trainers nationwide within the next 60 days.

DHS has also begun to implement the priorities outlined in the CVE Training Vetting Framework developed by Federal Emergency Management Agency (FEMA) and Federal Law Enforcement Training Center. For example, DHS has identified Subject Matter Expert (SME) trainers who have a background in CVE on the new Webportal. These SMEs meet the standards of DHS's training guidance and best practices, and can be used as an additional resource by our state and local partners.

To better communicate CVE topics to state and local partners, DHS/FEMA is also working on a new Information Bulletin for State Administrative Agency Heads and grantees that describes the new CVE Webportal and the CVE training activities that can be funded by the FY 2012 Homeland Security Grant Program.

We noted the report does not contain any recommendations specifically directed to DHS, however, please know the Department remains committed to improving and expanding its development of CVE resources and communicating the content of these resources to its state and local partners.

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

Sincerely,



Jim H. Crumpacker
Director
Departmental GAO-OIG Liaison Office

Appendix VI: Comments from the Department of Justice



Office of the Deputy Attorney General
Washington, D.C. 20530

September 17, 2012

Eileen Larence, Director
Homeland Security and Justice Issues
441 G Street, N.W.
Washington, D.C. 20548

Subject: GAO Draft Report *Countering Violent Extremism: Additional Actions Could Strengthen Training Efforts* (GAO-12-952SU)

Dear Ms. Larence:

The Department of Justice appreciates the opportunity to review the Government Accountability Office's (GAO) draft report entitled *Countering Violent Extremism: Additional Actions Could Strengthen Training Efforts* (GAO-12-952SU). The draft report contains two recommendations for executive action:

Recommendation 1:

"To better enable DOJ to demonstrate the extent to which it is fulfilling its [countering violent extremism (CVE)]-related training responsibilities, we recommend that the Deputy Attorney General identify principal topics that encompass CVE-related training—including training that is directly related to CVE or that has ancillary benefits to CVE—and communicate the topics to DOJ components."

Recommendation 2:

"To obtain valuable information for determining the extent to which CVE-related programs are yielding the desired outcomes and complying with the CVE national strategy, we recommend the following two actions: The Deputy Attorney General direct USAOs and the Director of the FBI's Office of Public Affairs direct FBI field offices to consider soliciting feedback more consistently from participants in informal training, such as presentations and briefings, that covers the type of information addressed in the CVE national strategy."

The Department concurs generally with the GAO's second recommendation and will provide a plan of action in its response to Congress that describes how the U.S. Attorneys' Offices and the FBI field offices will consider soliciting feedback more consistently from participants in the type of informal training identified and discussed in the draft report.

The Department disagrees, however, with the GAO's recommendation that DOJ "identify principal topics that encompass CVE-related training—including training that is directly related to CVE or that has ancillary benefits to CVE" in order to "demonstrate the extent to which it is

Ms. Eileen Larence
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fulfilling its CVE-related training responsibilities.” (GAO Draft Report, p. 32.) The Department believes this recommendation rests upon a fundamental misunderstanding of the Department’s efforts to counter violent extremism.

Due to the Department’s—and specifically the U.S. Attorneys’ Offices’—long history of constructive engagement with various communities, the Department’s approach to CVE is focused primarily on engaging with communities that may be targeted by violent extremists, not CVE-related training. Under the Administration’s Strategic Implementation Plan for Empowering Local Partners to Prevent Violent Extremism in the United States (SIP), the Department has primary responsibility, through its U.S. Attorneys’ Offices, for expanding the scope of engagement and outreach events and initiatives that may have direct or indirect benefits for CVE. It shares lead responsibility with the Department of Homeland Security (DHS), and in some cases with the National Counterterrorism Center (NCTC), for other engagement-related efforts. While DOJ has primary responsibility for many community engagement and outreach efforts, it does not have primary responsibility for developing specific CVE-related training.¹ Under the SIP, DHS has primary responsibility for improving the development and use of standardized CVE-related training. Indeed, virtually all of the current and future activities listed under SIP Objective 2.3, which focuses on improving CVE training, are led by DHS, or relate exclusively to important work that DHS has done, especially with respect to state and local law enforcement.²

The National CVE Strategy recognizes that, “[r]ather than creating a new architecture of institutions and funding” to combat violent extremism, we should be “utilizing successful models” that already exist. *Empowering Local Partners to Prevent Violent Extremism in the United States*, p. 3. In the same way that the Department engages with communities to raise awareness about other public safety threats or acts of violence, the Department has been and will continue to work “to ensure that our communities are empowered to recognize threats of violent extremism and understand the range of government and nongovernment resources that help keep their families, friends, and neighbors safe.” (SIP, p. 7.)

Through the U.S. Attorneys’ Offices and other DOJ components, the Department has successfully leveraged existing programs and partnerships to expand its engagement efforts consistent with the SIP. In December 2010, 32 U.S. Attorneys’ Offices began expanding their

¹ This is not to suggest, however, that the Department does not conduct any CVE-related training for state and local law enforcement. For example, the Office of Justice Program’s State and Local Antiterrorism Training (SLATT) program has direct benefits for CVE. SLATT courses include: Pathways to Radicalization, Recognizing Terrorist Indicators and Warning Signs, Special Interest/Anarchist Groups, Radicalization on College Campuses, the Psychopathology of Hate Groups, and Violent Criminal Extremism in the Prison System.

² An exception to this involves review of training materials and guidance on training. All departments and agencies have the lead on “taking steps to identify training materials that may not meet internal standards and to improve processes for creating and reviewing such materials.” As the GAO correctly notes in the report, “DOJ has undertaken reviews and DHS and DOJ have developed guidance to improve training quality.” (GAO Draft Report, p. 26.)

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engagement with communities to raise awareness about civil rights violations and public safety threats, including the threat of violent extremism. As part of the SIP, the Department has built on that initial U.S. Attorney-led effort and included communities that may be targeted by violent extremism into broader engagement forums and programs that involve other communities. In addition, the Department is coordinating efforts to expand engagement specific to CVE with communities that may be targeted by violent extremists.

While the Department undertakes various cultural competency trainings and community outreach efforts—and recognizes how these may have benefits for CVE—it would be imprecise and potentially counter-productive to redefine them as “CVE,” as the GAO draft report recommends. Labeling our related cultural competency trainings and engagement and outreach efforts as “CVE” would imply that they are driven by security efforts when they are not.³ For example, the Department’s Community Relations Service (CRS) has a specific statutory mandate as the only federal agency dedicated to assisting state and local units of government, private and public organizations and community groups with preventing and resolving racial and ethnic tensions, incidents and civil disorders, and in restoring racial stability and harmony. While the Department certainly recognizes how CRS’s work benefits CVE by improving relations and building trust between the government and certain communities, CVE is not within CRS’s statutory purview and its work was not specifically designed to benefit CVE.

Across the range of DOJ activities with direct and ancillary CVE benefits, the Department has coordinated closely, both within and outside the Department, to facilitate a whole-of-government approach to CVE. For example, DHS is developing CVE curricula, and Department components have provided input and feedback as appropriate. We also participate in the sub-Interagency Policy Committee on CVE Training that is co-led by DHS and NCTC; through this group, DOJ components are made aware of training modules that are being developed and funded at other agencies, and those agencies are likewise made aware of DOJ funding opportunities.

³ Indeed, as the SIP recognizes, at the same time we engage in outreach, “we must ensure that our efforts to prevent violent extremism do not narrow our relationships with communities to any single issue, including national security.” (SIP, p. 7.)

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In conclusion, the Department appreciates the work of the GAO and this opportunity to comment on the GAO's draft report. We will follow up with the GAO on a course of action to address its second recommendation. We are also committed to providing Members of Congress with information on the Department's efforts to implement the Administration's CVE national strategy. Should you have any questions regarding this topic, please do not hesitate to contact Louise Duhamel, Acting Assistant Director, Audit Liaison Group, at 202-514-0469.

Sincerely,



James M. Cole
Deputy Attorney General

Appendix VII: GAO Contact and Acknowledgments

GAO Contact

Eileen R. Larence, (202) 512-8777 or larencee@gao.gov

Acknowledgments

In addition to the contact named above, Kristy N. Brown, Assistant Director, and Taylor Matheson, Analyst-In-Charge, managed this assignment. Melissa Bogar and Lerone Reid made significant contributions to this report. Gustavo Crosetto, Pamela Davidson, Richard Eiserman, Eric Hauswirth, Thomas Lombardi, Linda Miller, Jan Montgomery, and Anthony Pordes also provided valuable assistance.

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