



March 2024

# NUCLEAR TERRORISM PREVENTION

## DHS Has Strengthened the Securing the Cities Program, but Actions Are Needed to Address Key Remaining Challenges

Accessible Version

# GAO Highlights

Highlights of [GAO-24-106922](#), a report to congressional committees

## Why GAO Did This Study

The U.S. faces an enduring threat that terrorists could steal or smuggle nuclear or radiological materials to use in a terrorist attack. The Department of Homeland Security initiated the STC program as a pilot in 2007 to reduce the risk of such attacks by developing and enhancing sustainable radiological and nuclear detection capabilities of state and local agencies in high-risk urban areas. The program includes 13 regions. CWMD awarded about \$300 million to these regions through fiscal year 2023.

The CWMD Act of 2018 included a provision for GAO to evaluate the STC program once CWMD completed an assessment of the program, which it did in 2022. This report evaluates (1) CWMD's efforts to strengthen the STC program and address regions' challenges and (2) the extent to which CWMD is measuring and tracking STC regions' performance.

GAO reviewed CWMD and STC regions' documents, interviewed officials from CWMD and from each region, and visited two regions carrying out training exercises. GAO compared CWMD's performance assessment approach with key practices for assessing program effectiveness that GAO identified in prior work.

## What GAO Recommends

GAO is making five recommendations, including that CWMD clearly communicate performance expectations to STC regions, collect quality information from the regions, and ensure regions' timely progress through program phases and toward achieving program goals. DHS concurred with the recommendations.

View [GAO-24-106922](#). For more information, contact Allison Bawden at (202) 512-3841 or [bawdena@gao.gov](mailto:bawdena@gao.gov).

March 2024

## NUCLEAR TERRORISM PREVENTION

### DHS Has Strengthened the Securing the Cities Program, but Actions Are Needed to Address Key Remaining Challenges

#### What GAO Found

The Department of Homeland Security's Countering Weapons of Mass Destruction Office (CWMD) has taken multiple steps to strengthen the Securing the Cities (STC) program and is working with regions to address remaining program implementation challenges. CWMD awards funding to support STC regions' program administration. It also funds the procurement and deployment of radiological and nuclear detection equipment and training for the law enforcement officers and other agency partners who use it. To strengthen the program, CWMD has increased outreach and communication activities, developed templates for regional planning and quarterly reporting, and ensured regions' access to long-term federal funding to sustain their STC-related capabilities.

As CWMD continues to improve the program, it is also working with STC regions to address challenges that may affect program implementation. Regions identified several key challenges, including staff attrition and turnover; availability and difficulty of scheduling training courses; and keeping partner agencies engaged with the STC program mission among other competing priorities.

#### Photos of Types of Nuclear and Radiological Detection Equipment



Source: Department of Homeland Security (photos). | GAO-24-106922

#### Accessible Text for Photos of Types of Nuclear and Radiological Detection Equipment

- Rectangular handheld device with screen
- Rectangular hardware with specialized attachments
- Hardware resting on surface
- Handheld device in front of backpack

Source: Department of Homeland Security (photos). | GAO-24-106922

CWMD's approach to measuring and tracking regions' performance—outlined in a 2023 revision to its STC program implementation plan—generally follows the key practices and their supporting actions for assessing program effectiveness. For example, CWMD uses weekly or biweekly meetings with the STC regions to provide tailored information that regions need to address specific issues affecting their program implementation. However, it has not clearly communicated to the regions the performance expectations and planned assessment approach adopted in the revised plan. By doing so, CWMD would increase the transparency and accountability for results being achieved through the program.

CWMD is collecting and reviewing regional performance data to set targets and benchmarks for assessments that it plans to begin in fiscal year 2025. However, it needs to take additional steps to ensure that information collected from the regions is timely, consistent, complete, and accurate. CWMD officials also stated that they need to complete ongoing and planned efforts to better oversee and hold regions accountable for their performance and timely progress through program phases and toward achieving program goals. By taking these steps, CWMD will be in a better position to use evidence to manage the STC program more effectively, demonstrate regions' progress toward meeting the program goals, and communicate these results to stakeholders.

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#### Abbreviations

CWMD	Countering Weapons of Mass Destruction Office
DHS	Department of Homeland Security
STC	Securing the Cities

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March 20, 2024

### Congressional Committees

The U.S. faces an enduring threat that terrorists could steal or smuggle nuclear or radiological materials to use in a terrorist attack, and efforts to counter such threats are considered a top national priority.<sup>1</sup> The Countering Weapons of Mass Destruction Act of 2018 amended the Homeland Security Act of 2002 to establish in statute the Department of Homeland Security’s (DHS) Countering Weapons of Mass Destruction Office (CWMD) and to authorize CWMD to implement the Securing the Cities (STC) program.<sup>2</sup> CWMD works to protect against the dangers posed by hostile state and nonstate actors who seek to acquire and use nuclear, chemical, radiological, or biological materials in the form of weapons of mass destruction to harm Americans or U.S. interests.<sup>3</sup>

DHS initiated the STC program in fiscal year 2007 as a pilot in the New York City, Jersey City, and Newark region. The mission of the STC

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<sup>1</sup>GAO, *Combating Nuclear Terrorism: DHS Should Address Limitation to Its Program to Secure Key Cities*, [GAO-19-327](#) (Washington, D.C.: May 13, 2019). In addition, in March 2023, President Biden signed National Security Memorandum-19, which sets forth a national strategy to, among other things, reduce the risks posed by the malevolent use of nuclear and radiological materials. The White House, “FACT SHEET: President Biden Signs National Security Memorandum to Counter Weapons of Mass Destruction Terrorism and Advance Nuclear and Radioactive Material Security” (Mar. 2, 2023).

<sup>2</sup>Pub. L. No 115-387, §§ 2(a)(2), 2(a)(10), 132 Stat. 5162, 5164 (amending the Homeland Security Act of 2002, Pub. L. No. 107-296) (codified at 6 U.S.C. §§ 591, 596b). DHS’s Domestic Nuclear Detection Office implemented the STC program for the program’s first decade. During this time, this office was the primary entity in the U.S. government responsible for implementing domestic nuclear detection efforts to support a managed and coordinated strategy to counter nuclear or radiological threats. In October 2017, DHS initiated an intradepartmental reorganization under which the office was consolidated with other offices into a new office, known as the Countering Weapons of Mass Destruction Office. The Countering Weapons of Mass Destruction Act of 2018 redesignated the office as CWMD.

<sup>3</sup>CWMD manages programs intended to enhance the U.S.’ ability to detect, deter, and defend against chemical, biological, radiological, and nuclear threats. The primary statutory missions of the CWMD office are coordinating with other federal efforts and developing a strategy and policy for the department to (1) plan for, detect, and protect against the importation, possession, storage, transportation, development, or use of unauthorized chemical, biological, radiological, or nuclear materials, devices, or agents in the U.S.; and (2) protect against an attack using such materials, devices, or agents against U.S. people, territory, or interests.

program is to enhance the ability of the U.S. to detect and prevent the malevolent use of nuclear and radioactive materials that pose risks to high-risk urban areas. Therefore, the STC program seeks to reduce the risk of a successful deployment of a nuclear or radiological weapon against cities and surrounding metropolitan areas in the U.S. by providing, among other things, equipment and training to detect nuclear and radiological material before an incident involving these materials occurs. Our prior work has shown that a radiological weapon, also called a dirty bomb, detonated in an urban area has the potential of producing hundreds of deaths from evacuations and tens of billions of dollars in socioeconomic damage.<sup>4</sup>

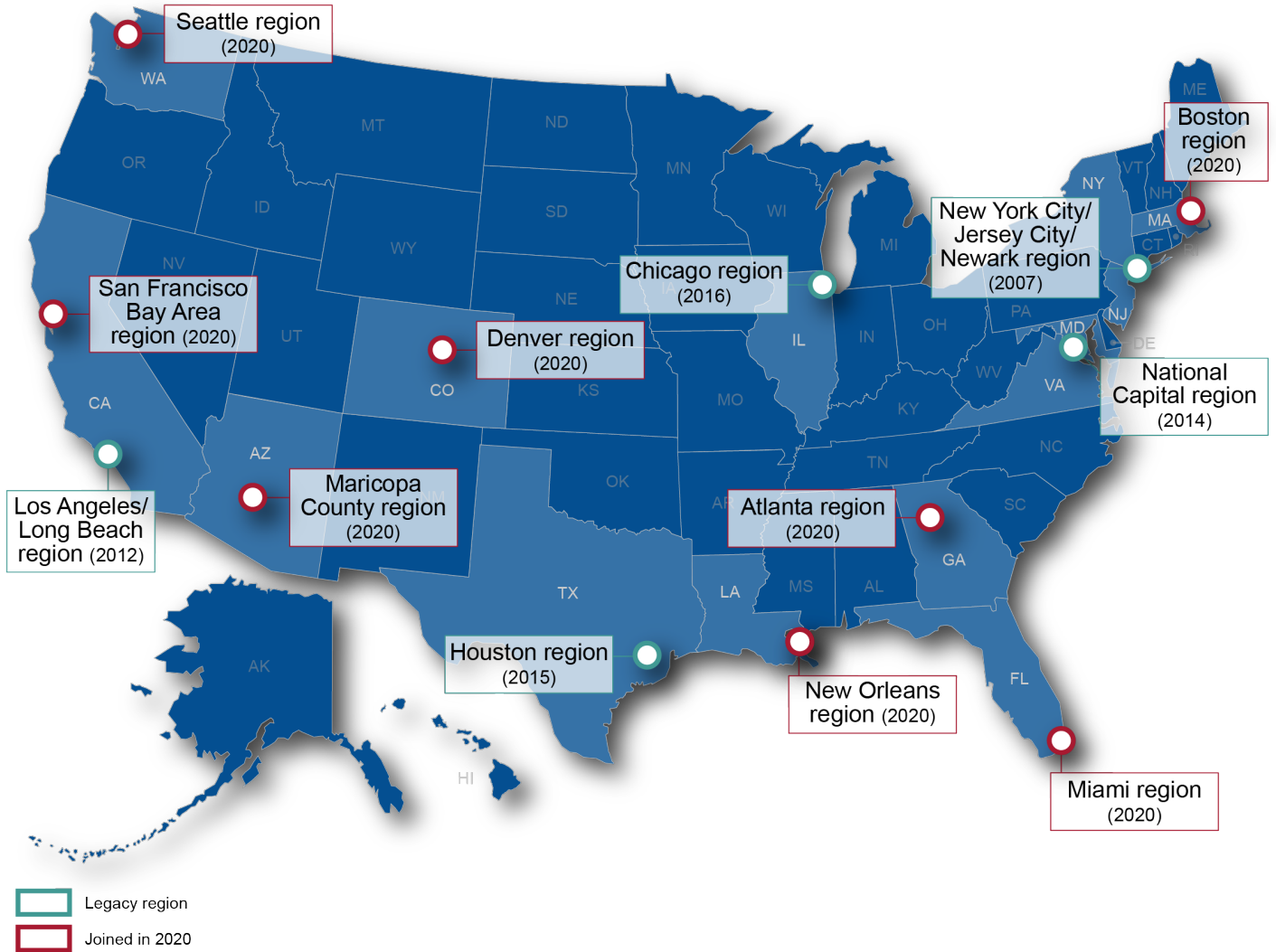
From 2012 through 2016, DHS initiated efforts to expand the program beyond the pilot phase and added four major metropolitan regions across the country, which, along with the New York City region, are referred to as the legacy regions. In 2020, the STC program expanded again and currently includes 13 participating regions across the U.S., as shown in figure 1.<sup>5</sup> The STC program has awarded the regions about \$300 million from fiscal year 2007 through the end of fiscal year 2023, with annual funding averaging around \$29 million in recent years.

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<sup>4</sup>GAO, *Combating Nuclear Terrorism: NRC Needs to Take Additional Actions to Ensure the Security of High-Risk Radioactive Material*, [GAO-19-468](#) (Washington, D.C.: Apr. 4, 2019). According to experts and recent studies, fatalities are unlikely to result from a radiological dispersal device, or dirty bomb. Studies in 2017 and 2018 from Sandia National Laboratories measuring the consequences of these devices found that there would be no immediate fatalities from radiation. The experts convened for our 2019 report generally agreed that socioeconomic effects (e.g., relocations and cleanup costs) and fatalities that could result from evacuations are the most relevant criteria for evaluating the risks of radioactive material.

<sup>5</sup>CWMD uses the Federal Emergency Management Agency's designations for High-Risk Urban Areas. These areas include the 100 most populous metropolitan areas in the U.S., which are assessed annually for their relative risk of terrorist acts. In some instances, CWMD has consolidated multiple cities into a single region. As a result, the STC program includes 13 regions composed of 15 cities deemed a high risk for a nuclear or radiological attack. For reporting purposes, we will use the terms "region" or "STC regions" to refer to the participating cities and surrounding metropolitan areas.

Figure 1: Securing the Cities Program Regions and Dates When They Joined



Sources: Department of Homeland Security; Map Resources (map). | GAO-24-106922

**Accessible Text for Figure 1: Securing the Cities Program Regions and Dates When They Joined**

- Seattle region – 2020
- San Francisco Bay Area region 2020
- Denver region – 2020
- Chicago region – 2016
- New York City/Jersey City/Newark region – 2007



- National Capital region – 2014
- Boston region – 2020
- Miami region – 2020
- New Orleans – 2020
- Atlanta region – 2020
- Houston region – 2015
- Maricopa region – 2020
- Los Angeles/Long Beach region - 2012

Sources: Department of Homeland Security; Map Resources (map). | GAO-24-106922

In May 2019, we identified several limitations in CWMD Office's efforts to implement the STC program.<sup>6</sup> We found that CWMD did not collect information needed to fully track the regions' use of STC funds for approved purposes and to assess regions' performance in the program. We reported that CWMD tracked some performance data but did not collect data needed to ensure that performance metrics and program milestones were achieved. To address limitations that we identified with CWMD's management of the STC program, we made four recommendations to CWMD, including that the agency should more fully assess regions' performance by collecting information on achievement of key performance metrics and milestones and enforcing reporting requirements.<sup>7</sup>

The Countering Weapons of Mass Destruction Act of 2018 included a requirement for CWMD to develop an implementation plan and strategy for the STC program. CWMD issued this plan in June 2021. The act also required that CWMD assess performance of the STC program based on this plan, which it completed in August 2022. The act also included a provision for GAO to evaluate CWMD's implementation plan and progress in achieving and sustaining STC program capabilities.<sup>8</sup> This report examines (1) what steps CWMD has taken to strengthen the program and address any challenges facing the STC regions in achieving and sustaining detection capabilities and (2) the extent to which CWMD is measuring and tracking participating regions' progress toward achieving the goals and objectives of the STC program.

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<sup>6</sup>GAO-19-327.

<sup>7</sup>In November 2021, we determined that CWMD had taken steps to implement each of the four recommendations.

<sup>8</sup>Pub. L. No 115-387, § 2(a)(10), 132 Stat. 5162, 5164 (codified at 6 U.S.C. § 596b(d)(3)). The act directs GAO to report on its findings within 18 months of the date when CWMD issued its 2022 assessment report.

To address the first objective, we reviewed CWMD guidance, policies, and other agency documentation that establish the structure of the program and support provided to the regions. We reviewed cooperative agreements that CWMD enters into with the STC regions, which include the terms and conditions for participation in the program and their associated funding awards. We interviewed CWMD officials about changes to the STC program, such as steps to improve communication between CWMD and the regions and CWMD's process for overseeing the regions' timely development and submission of required plans and reports. We interviewed officials from each of the 13 regions to learn about their experiences and perspectives on participating in the program, including challenges they face and steps CWMD is taking to address their challenges.<sup>9</sup> We also conducted site visits to two STC regions that were conducting training exercises and attended a semiannual national STC program meeting.

To address the second objective, we interviewed CWMD officials and analyzed regional plans and quarterly performance progress reports. We compared the 2023 STC Program Implementation Plan developed by CWMD with key practices we have previously identified for performance management and for evidence-building activities for managing and assessing the results of federal efforts.<sup>10</sup> We also interviewed officials from each of the 13 STC regions. We asked about their efforts to implement the program in their areas, their performance goals and objectives, and how CWMD has assessed and communicated to them about their performance and progress. Further, we discussed with regional officials what actions CWMD has taken to hold regions accountable. We obtained and reviewed performance reports and other documentation the STC regions must submit to CWMD to document their activities and progress.

We conducted this performance audit from June 2023 to March 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain

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<sup>9</sup>For these interviews, we used a standard set of questions to capture the officials' responses and perspectives on the STC program. We analyzed the results of these interviews and related documents. We use the following modifiers to characterize our findings, as follows: "some" represents three to four regions, "several" represents five to six regions, "many" represents seven to eight regions, "most" represents nine to 10 regions, and "nearly all" represents 11 to 12 regions, and "all" or "each" for 13 regions.

<sup>10</sup>GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023).

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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.

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## Background

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### STC Program Goals and Phases

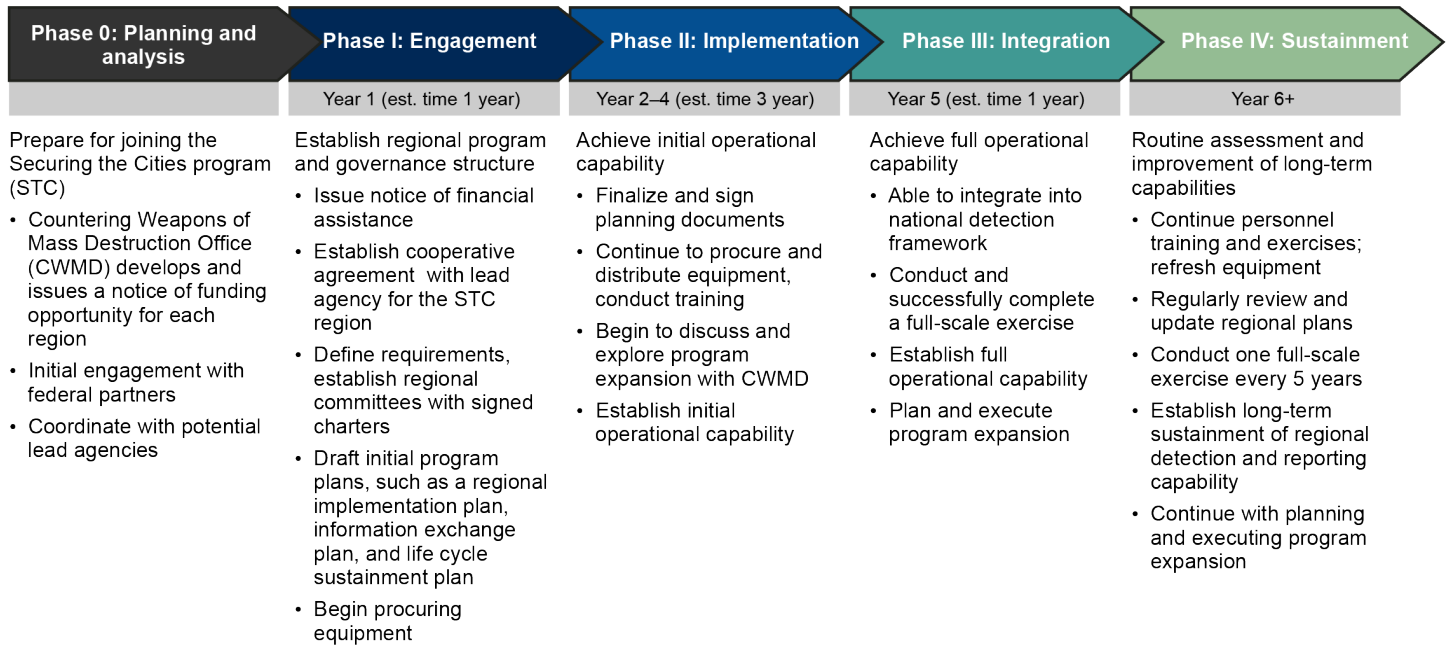
The STC program has three primary goals: (1) enhance regional capabilities to detect, identify, report, and interdict nuclear and other radioactive materials out of regulatory control; (2) provide regional training and exercise opportunities necessary to enhance regional capabilities; and (3) support long-term sustainment of these critical capabilities over time.

The program has the following four objectives to help accomplish these goals:

1. Assist state, local, tribal, and territorial agencies in developing radiological/nuclear detection and reporting capability. This helps ensure more efficient operations and better communications with the regions and their partners in the event of an attack.
2. Establish information connectivity to support radiological/nuclear alarm adjudication through developed interagency protocols. This requires establishment and connection of partner agencies' systems, including cellphones, tablets, and laptops, so that information about a potential threat alarm flows to those who need it to determine an appropriate response.
3. Establish administrative infrastructure to support a radiological/nuclear detection program.
4. Establish coordination mechanisms between federal, state, local, tribal, and territorial partners for day-to-day operations; enhance these operations to provide additional detection capabilities for planned special events with increased security needs or as part of coordinated responses to identified threats; and search operations.

The STC program consists of five phases that provide participating regions with a framework for the planning, engagement, implementation, integration, and sustainment of nuclear or radiological detection capabilities, as shown in figure 2.

**Figure 2: Securing the Cities Program Phased Implementation Approach**



Source: GAO summary of Department of Homeland Security information. | GAO-24-106922

**Accessible Text for Figure 2: Securing the Cities Program Phased Implementation Approach**

Phase	Phase title	Time period	Phase information
Zero	Planning and Analysis	na	<p>Prepare for joining the Securing the Cities program (STC)</p> <ul style="list-style-type: none"> <li>Countering Weapons of Mass Destruction Office (CWMD) develops and issues a notice of funding opportunity for each region</li> <li>Initial engagement with federal partners</li> <li>Coordinate with potential lead agencies</li> </ul>

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Phase	Phase title	Time period	Phase information
One	Engagement	Year one (estimated time one year)	Establish regional program and governance structure <ul style="list-style-type: none"> <li>• Issue notice of financial assistance</li> <li>• Establish cooperative agreement with lead agency for the STC region</li> <li>• Define requirements, establish regional committees with signed charters</li> <li>• Draft initial program plans, such as a regional implementation plan, information exchange plan, and life cycle sustainment plan</li> <li>• Begin procuring equipment</li> </ul>
Two	Implementation	Years two through four (estimated time three years)	Achieve initial operational capability <ul style="list-style-type: none"> <li>• Finalize and sign planning documents</li> <li>• Continue to procure and distribute equipment, conduct training</li> <li>• Begin to discuss and explore program expansion with CWMD</li> <li>• Establish initial operational capability</li> </ul>
Three	Integration	Year five (estimated time one year)	Achieve full operational capability <ul style="list-style-type: none"> <li>• Able to integrate into national detection framework</li> <li>• Conduct and successfully complete a full-scale exercise</li> <li>• Establish full operational capability</li> <li>• Plan and execute program expansion</li> </ul>

Phase	Phase title	Time period	Phase information
Four	Sustainment	Year six plus	<p>Routine assessment and improvement of long-term capabilities</p> <ul style="list-style-type: none"><li>• Continue personnel training and exercises; refresh equipment</li><li>• Regularly review and update regional plans</li><li>• Conduct one full-scale exercise every 5 years</li><li>• Establish long-term sustainment of regional detection and reporting capability</li><li>• Continue with planning and executing program expansion</li></ul>

Source: GAO summary of Department of Homeland Security information. | GAO-24-106922

As of December 1, 2023, four STC regions are in the sustainment phase (IV), six regions are in the implementation phase (II), and three regions are in the engagement phase (I).

## How the STC Program Operates

The STC program operates as a cooperative agreement between CWMD and eligible regions.<sup>11</sup> A full cooperative agreement package for the STC program includes a notice of funding opportunity, notice of financial assistance, terms and conditions for award recipients, and general guidance for the program.

<sup>11</sup>A cooperative agreement is a legal instrument of financial assistance between a federal agency and a recipient, the principal purpose of which is to transfer anything of value to the recipient to carry out a public purpose authorized by law instead of acquiring property or services for the federal government's direct benefit or use. The distinction between a cooperative agreement and a grant agreement is that substantial involvement is expected between the federal agency and the recipient when carrying out the activity contemplated by the federal award, whereas such involvement is not expected in carrying out a grant agreement. 31 U.S.C. §§ 6304-6305; 2 C.F.R. § 200.1.

CWMD seeks applications for the program through a notice of funding opportunity, which lays out eligibility criteria and other requirements.<sup>12</sup> In its application to the STC program, the interested region identifies the proposed lead agency that will be responsible for administering the program, such as a city police department, and provides program details to answer the requirements specified in the funding notice. CWMD then evaluates the application, awards a cooperative agreement, and begins engaging with the lead agency to start building the local program structure.

When CWMD accepts a region into the STC program, the lead agency receives a notice of financial assistance, which details the approved budget for an approved budget period, among other requirements. The lead agency can then award funds to its local and state principal partners and subpartners, such as police departments, fire departments, and public health agencies. The lead agency is responsible for local program management, procuring and deploying equipment to its partners, and coordination with CWMD. It is also responsible for developing and submitting required plans and other reports, including required quarterly performance reports with expenditure information, as required by the cooperative agreement.

For awards to STC regions that joined the program between fiscal years 2012 and 2019, CWMD used cooperative agreements that covered a 5-year period of performance, under which the regions were eligible to receive and obligate funding. In some instances, the regions could seek an extension to obligate their funds if they had been unable to do so within the original period of performance. Beginning in fiscal year 2020, CWMD entered into a new series of cooperative agreements with each of the 13 STC regions that included 10-year periods of performance, to include continued federal support for all program phases. The new 10-year agreements include budget periods of 12 months each and require regions to apply annually for the next funding increment. According to CWMD, the applications should contain the following elements: project narrative; key personnel; principal partners; detailed budget by category; separate narrative and budget for carryover funding from prior year by

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<sup>12</sup>Beginning in fiscal year 2012, the program opened eligibility to regions in DHS's Urban Area Security Initiative identified as having the highest risks for a terrorist attack. This initiative is a program that provides funding to enhance regional preparedness and capabilities in designated high-risk urban areas.

category, such as equipment and training; and other required standard forms.

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## STC Program Activities

Regions participating in the STC program may spend their funds on nuclear and radiological detection equipment and training and administrative program costs, among other things. Such equipment and training are the basis for the detection capabilities developed through the program. Several types of detection equipment may be used.

- **Personal radiation detectors** are wearable radiation detectors, approximately the size of a cellular phone. When exposed to elevated radiation levels, the devices alarm with flashing lights, tones, vibrations, or combinations of these. Most personal radiation detectors numerically display the detected radiation intensity (on a scale of zero to nine) and alert their users to nearby radiation sources. However, they typically are not as sensitive as more advanced detectors and cannot identify the type of radiation source.
- **Radiation isotope identification devices** are radiation detectors that can analyze the energy spectrum of radiation, which enables them to identify the specific material emitting the radiation. Such devices may determine if detected radiation is coming from a potential threat or from naturally occurring radioactive material, such as granite.
- **Mobile detection systems** contain larger detectors. Typically, mobile detection systems interface with a laptop computer to display alarms and analysis, and they are capable of both detection and identification. This type of system may be mounted on vehicle platforms, such as cars, trucks, vans, boats, or helicopters.
- **Radiation detection backpacks** are used for initial screening and for conducting wide area searches, according to CWMD officials. These officials said the size of the detector contained within the backpack allows the operator greater detection sensitivity as compared with a personal radiation detector. CWMD officials also said these devices are especially useful for screening a large venue for radiological materials prior to occupancy by the public.

Figure 3 shows examples of such equipment.



**Figure 3: Photos of Types of Nuclear and Radiological Detection Equipment**



Source: Department of Homeland Security (photos). | GAO-24-106922

**Accessible Text for Figure 3: Photos of Types of Nuclear and Radiological Detection Equipment**

- Rectangular handheld device with screen
- Rectangular hardware with specialized attachments
- Hardware resting on surface
- Handheld device in front of backpack

Source: Department of Homeland Security (photos). | GAO-24-106922

## STC Program Implementation Plans

The Countering Weapons of Mass Destruction Act of 2018 required CWMD to develop an implementation plan for carrying out the STC program that includes

1. a discussion of the goals of the STC program and a strategy to achieve those goals,
2. performance metrics and milestones for the STC program,
3. measures for achieving and sustaining capabilities under the STC program, and
4. costs associated with achieving the goals of the STC program.

CWMD developed and issued its initial Implementation Plan for the Securing the Cities Program on June 4, 2021.<sup>13</sup> Since then, language

<sup>13</sup>Department of Homeland Security, Countering Weapons of Mass Destruction Office, *Implementation Plan for the Securing the Cities Program, Fiscal Year 2019 Report to Congress* (June 4, 2021). The act included a deadline for the implementation plan to be submitted to the appropriate congressional committees and the Comptroller General of the United States by December 21, 2019.

accompanying the office's appropriations has twice directed CWMD to update its STC implementation plan, with the most recent revision issued in June 2023.<sup>14</sup> For this report, we focus on the program assessment approach and the set of performance measures and outcomes adopted in the 2023 revisions to the plan.

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## CWMD Has Strengthened Its Program to Secure Cities and Is Addressing Regional Challenges to Ensure Progress toward Achieving and Sustaining Detection Capabilities

CWMD has taken multiple steps to strengthen the STC program and continues working with the regions to address challenges and ensure continued progress toward achieving and sustaining their detection capabilities. Specifically, CWMD has incorporated lessons learned from implementing the STC program over the years. Further, it has addressed our prior recommendations to strengthen the program, including increasing outreach, developing planning and reporting guidance, and providing long-term federal sustainment funding. Along with these improvements, CWMD is working with the STC regions to address challenges they continue to face in implementing their programs, such as staff attrition, training availability and scheduling, partner engagement, and expansion of their programs.

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### CWMD Has Taken Multiple Steps to Strengthen the STC Program

In 2020, CWMD began taking multiple steps to strengthen the STC program that reflect lessons learned from years implementing the program, as well as recommendations in our prior work. The steps include increasing outreach and communication, developing planning and reporting templates, and providing federal funding for sustainment of capabilities developed through the STC regional programs.

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<sup>14</sup>The directions to update the implementation plans were included in the joint explanatory statements accompanying the DHS appropriations acts for fiscal years 2022 and 2023. CWMD issued its first revision to the plan in November 2022 and its second revision in June 2023.

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### Increased Outreach and Communication

CWMD's current STC program leadership is conducting extensive outreach activities to foster more consistent, frequent, and collaborative communication between CWMD and the STC regions and among the regions themselves. These include initiating a range of regularly scheduled activities, such as weekly or biweekly meetings for STC regions and federal program leaders; monthly webinars on programmatic and technical topics; semiannual meetings; and other information sessions, as needed, to help provide the regions with guidance on program requirements. Most of the STC regional officials we interviewed told us they appreciated the "open door" approach CWMD has fostered and the flexibility to keep in touch with their assigned federal program managers as frequently as needed to get assistance. Some officials also noted that when CWMD cannot provide the answers or solutions needed to their questions, it makes the effort to connect regions to those who can.

In our interviews with officials of the 13 STC regions, most described the increased outreach and communication between CWMD leadership and the regions as one of the primary improvements to the program in recent years. This includes encouraging the regions to coordinate and collaborate with each other to work through common issues. Regarding the outreach activities CWMD initiated, officials from each of the 13 STC regions we interviewed told us that the semiannual meetings have presented meaningful opportunities to develop in-person relationships with their colleagues to share information, best practices, and lessons learned through their experiences in their respective regions.

### Planning and Reporting Templates

CWMD standardized its implementation structure with what it refers to as a "Program in a Box" in response to lessons learned from the pilot program and requests for guidance from regions, according to CWMD planning documents. The Program in a Box includes templates for the various planning and governance documents the STC regions must develop, such as a regional implementation plan and executive committee charters. While these templates help establish a degree of standardization and set expectations for what the regions should include in their respective plans, CWMD officials told us they are open to the regions using other formats that could be tailored to meet their needs and internal procedures.

CWMD officials told us they have also started an internal community of interest website to serve as a repository for national and regional STC program documentation. The regions can voluntarily upload their planning, quarterly performance reports, and other documentation to serve as resources and best practices for other regions to adopt. This also includes utilizing a DHS platform that offers STC regions the ability to customize and visualize the data they report on their operational, training, and equipment activities.

Additionally, in March 2023, CWMD revised its quarterly reporting templates to help ensure that more consistent and complete information was collected about the regions' operations and activities. Officials from some of the STC regions we interviewed told us they were uncertain about what information CWMD wanted them to report using the prior templates because the templates did not contain instructions or guidance on what information to include. For example, it was unclear what period should be covered in the report or what some of the acronyms meant. In revising the templates to better align with information CWMD needed to track regional performance, CWMD also developed a cover page that includes instructions for completing the report, a table with the months covered by each quarter of the federal fiscal year, and definitions for key terms.

### Federal Sustainment Funding

Beginning with fiscal year 2020 grant awards, CWMD entered into cooperative agreements that provide for a 10-year period of performance, including funding for the sustainment phase. According to CWMD, providing federal funding beyond the initial 5-year implementation period was necessary to assure sustained regional capabilities, support program stability, and provide ongoing direct technical support.<sup>15</sup> As we found in our prior work, officials from the five legacy regions raised concerns about their ability to maintain and sustain capabilities over time without a dedicated source of federal funding.

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<sup>15</sup>When the STC program was initially formed, federal funding was provided for an initial 5-year implementation period when the participating regions were expected to develop their programs and detection capabilities. While CWMD would continue to assist with program management and provide technical support, the expectation was for the regions to secure the funding needed for continued sustainment of the capabilities and equipment through local, state, or other sources.

Though four STC regions have entered the sustainment phase, officials from many regions we interviewed told us about planning benefits from assured federal funding beyond their initial implementation phase. For example, officials from one region told us that before federal sustainment funding was available, the region had delayed developing its life cycle sustainment plan to focus on short-term efforts to procure and distribute equipment to its existing partners. However, the officials told us the availability of the long-term funding enabled the region to take a broader outlook to sustain the capabilities it developed. Officials from many of the STC regions we interviewed told us that the sustainment funding will help their efforts to maintain and recruit additional partnerships as they work to expand their respective programs' coverage. For example, officials from two regions explained that, given the expense of equipment and trainings, the long-term funding makes it easier to recruit partner agencies because they do not need to burden their own financial resources.

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### CWMD Is Working to Address a Variety of Challenges Affecting Some Regions' Program Implementation

As CWMD continues its efforts to strengthen the STC program, it is also working with the regions to address a variety of internal and external challenges and issues affecting program implementation. From our interviews with officials from each of the 13 STC regions and analysis of their annual program reviews for fiscal years 2023 and 2024, we found the following:

- **Officials from several regions reported challenges related to staff attrition and turnover in STC programs and partner agencies that can make it difficult to administer the program and maintain continuity of operations.** Staff attrition rates from retirements, reassignments, promotions, and other factors have led to staffing shortages and unfilled positions in some regional programs, causing difficulty maintaining the organizational capacity needed to operate their programs. For example, officials in one region told us that it had gone nearly 2 years without a full-time permanent program manager, which has hampered efforts to keep up with planning and reporting requirements. Officials in another region told us that recent changes in regional program leaders have affected the continuity of their programs. Officials from a few regions noted that staff turnover in partner agencies means the regions have an ongoing need to manage new personnel and train them on the grant reporting requirements and train field staff on equipment. These program leadership and capacity issues can lead to required plans not being

developed or updated as required, delays in procuring equipment and scheduling training activities, and not spending down awarded funds at expected rates.

While CWMD reports recognize that the COVID-19 pandemic played a part in these staffing challenges, in other instances they have resulted from internal factors, such as competing priorities and reorganizations within local governments that CWMD has limited ability to address. To help one region, CWMD officials told us that in fiscal year 2022, CWMD issued a direct \$650,000 award to “re-establish and reinvigorate” the region’s governance and executive committee structures, which had been inconsistently staffed in recent years. CWMD also has had senior leadership visit the region to educate local officials about the STC program mission and its role in protecting public safety, along with other regional priorities.

- **Officials from several STC regions reported issues with the availability of and difficulty in scheduling training courses with CWMD’s federal vendor.** While officials from the regions told us they were generally satisfied with the quality of the training provided through CWMD’s federal vendor, several described issues with training course availability and scheduling difficulty. For example, officials from one region noted that the vendor often requires registration 6 to 9 months in advance, which is impractical for many of their law enforcement and emergency response partners. Officials from other regions told us it was difficult to meet the vendor’s minimum attendance requirements, which contributed to issues in meeting their training goals. Some of the regions reported that a shortage of law enforcement personnel was contributing to their training challenges, with personnel unavailable to backfill positions left vacant during training. Officials from one region noted that, without completing such trainings, achieving its goals for deploying the detection equipment was challenging.

CWMD and the regions have been exploring options to increase availability and flexibility in scheduling training. A leading option is for regions to use “train-the-trainer” courses to certify local staff to offer in-house training. Some of the regions have been using their own training staff to supplement the CWMD vendor’s courses, while others are in the early stages of developing this capability. For example, officials from some regions told us their goal was to achieve self-sufficiency by building its train-the-trainer capacity so that it could train its partners itself. Another region is seeking to acquire its own radiological sources required for these courses to enable it to provide a more flexible training schedule for its partners. While CWMD has

generally supported these efforts, officials from some of the regions told us it can be challenging to obtain the equipment and radiological source materials needed for the training courses, including having the necessary safety officers and getting the required certifications.

To help address the issues presented by shortages of law enforcement staff and their ability to attend trainings, CWMD and the regions are considering options to reduce time spent on in-person attendance. This could include a combination of virtual sessions for background or academic portions of the training, and in-person instruction on the equipment's functions and features. Another option includes streamlining the requirements for refresher trainings for those who have completed the initial courses compared with those required for new hires.

- **Officials from several regions reported concerns with how CWMD encourages expansion of STC regional programs.** A key initiative for CWMD in fiscal year 2024 is the continued expansion of STC regional programs. CWMD encourages regions to begin planning for program expansion early in the implementation phase of their program development. CWMD expects STC regions to expand their partnerships with local and state agencies so they can cover other neighboring high population centers and major threat pathways to their areas, such as known smuggling and trafficking routes.<sup>16</sup> According to CWMD's implementation plan, each region's annual funding application should include its expansion plans, informed by threat and capability assessments. CWMD then reviews the plans and considers how the region is performing under its cooperative agreement in determining whether to approve the request.

However, officials from some regions told us their concerns about a lack of guidance and criteria from CWMD on how, when, and where to expand their programs. Officials from one region expressed reservations about program expansion without a framework or clear set of expectations from CWMD. Officials from some regions indicated that they would need additional resources to support and sustain a larger footprint. One noted that growing a region's size and partnerships can sometimes hinder communication between partners. While many regions are actively working on expanding their

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<sup>16</sup>The lead agency in the respective STC regions initiates expansion by working with its partners and other federal agencies to conduct vulnerability assessments to identify threats, risks, and gaps that can be addressed through expansion, with the objective of developing a layered defense inside and around their initial program areas.

programs, others have elected to focus on developing capabilities in their core areas before engaging in such efforts.

CWMD officials said that while they are encouraging regions to think about expansion early in their program implementation, they also realize some regions may not be ready to initiate these efforts. CWMD officials also said that they are working with some regions whose programs have initiated expansion efforts and intend to provide lessons learned from these efforts to other regions. As other regions' programs mature and begin planning for expansion, CWMD is also looking to develop and provide the regions with threat briefings and other risk products to help them identify and assess where gaps and vulnerabilities exist that could be addressed through expansion.

- **Officials from some STC regions reported challenges in keeping partners engaged with the STC program mission compared with other priorities.** Partner agencies may range from law enforcement, fire services, and radiation health agencies to special district government entities, such as regional transit authorities, who establish principal partnerships to build detection capabilities throughout their geographic areas.<sup>17</sup> Although one agency is considered the lead for each region, they all have their own missions and priorities, which may compete with or take precedence over their role supporting the STC program at different times. For instance, officials for a few regions explained that a lack of understanding of the potential dangers of an event using radiological or nuclear materials, along with a minimal history of radiological detections leading directly to arrests or other law enforcement action, can make it difficult to market the program and get buy-in from law enforcement agencies that prioritize other public health and safety concerns. However, sharing program successes and other benefits that the STC program offers can help with this engagement (see text box below for an example).

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<sup>17</sup>These principal partnerships are executed through a memorandum of understanding or agreement with the region's lead agency, which integrates the partners with the region's STC processes and procedures, along with the resources the program will provide for equipment and training.



**Secondary Benefits of the STC Program—Houston, TX, October 2023**

The recent discovery of abandoned radiological material at a scrapyard in Houston, Texas illustrates secondary benefits to public safety that the Securing the Cities (STC) program can provide. While driving on a highway on October 16, 2023, an off-duty Houston police officer received an alert on the personal radiation detector issued to him by the STC Houston program. A single alert on a highway may be from a passing vehicle or be a false alarm, but this one formed a pattern—the officer had received an alert in the same area of northeast Houston before.

As a result, he exited the highway to investigate. His personal radiation detector helped him trace the radiation source to a nearby scrapyard. Following his training, the officer contacted the regional reporting system, which then sent the Houston Police Department bomb squad and contacted the local Federal Bureau of Investigation field office and state health department. Investigators searched the property using advanced radiation detection equipment.

The search discovered four improperly discarded devices containing cesium-137 emitting radiation at an intensity reported by the local press to be 50 times the public safety threshold. While cesium is common in medical devices and industrial gauges, improper storage can release radiation that increases cancer risk and causes burns and radiation sickness. In addition, the Nuclear Regulatory Commission considers cesium-137 an isotope of concern for its potential to be used in a “dirty bomb.”

According to the local press, the discovery was among the largest finds by STC Houston region’s local agency partners. Though the investigation identified no immediate threat to public safety, Countering Weapons of Mass Destruction Office officials pointed to it as evidence that the system is working as intended.

Source: GAO summary of information reported about the incident. | GAO-24-106922

One regional official told us that the region has experienced difficulties in implementing its program because, under state law, an alarm from a personal radiation detector is insufficient for establishing probable cause to stop or search someone. As noted above, personal radiation detectors do not identify the radiation by source type; accordingly, they cannot distinguish between medical or naturally occurring isotopes and others that may require a law enforcement response. Because of this, the regional official told us the region has not been deploying equipment to its law enforcement partners. Instead, the region has requested that CWMD approve its procurement of spectroscopic personal radiation detectors, which can identify the type of radiation that has been detected.<sup>18</sup> It has developed a set of standard operating procedures to help officers evaluate the totality of the circumstances when responding to an alarm from this equipment. Officials for the region explained that this more detailed information would provide officers with a better understanding of the type of material they were dealing with in determining whether to detain the individual. CWMD officials told us one of the concerns with this

<sup>18</sup>Spectroscopic personal radiation detectors have the additional capability to measure the energy spectrum of the radiation source to identify the specific radionuclide.

approach is that this equipment is more expensive, more complex to use, and requires additional training compared with the standard equipment. However, they told us they are working with the region to implement a pilot program in 2024 to evaluate if this approach is feasible for the region.

CWMD officials told us that other regions have faced similar issues. CWMD's advice to the regions has been to engage early on with their state attorney's offices and local counsels to better understand the scope of authority in their respective jurisdictions and how it applies in the STC mission space as part of developing their regions' standard operating procedures. CWMD also encourages the regions to use this outreach as an opportunity to inform their existing and potential future partners about the STC program.

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## **CWMD Generally Follows Key Practices in Its Planned Approach for Assessing STC Program Effectiveness but Has Not Been Conducting Formal Performance Assessments**

CWMD is generally following key practices in its planned approach for assessing STC program effectiveness, but it will not begin formally measuring and tracking regional performance until fiscal year 2025. CWMD's approach for assessing the performance of the STC program, including the development of its revised 2023 STC Program Implementation Plan, generally follows key practices for building and using evidence to manage and evaluate results of federal efforts. CWMD officials told us they will continue to collect and analyze regional data and other information to set performance targets through the end of fiscal year 2024 and will not begin formally assessing STC regions' performance using the measures in its implementation plan until fiscal year 2025.

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## **CWMD's Approach for Assessing STC Program Performance Generally Follows Key Practices**

We found that CWMD's planned approach for assessing STC program performance, which includes an implementation plan with measurable outcomes, generally follows key practices that we have identified in prior work for building and using evidence to manage and evaluate results of federal efforts. In June 2023, CWMD released an updated version of its

STC Implementation Plan detailing its current planned approach for implementing the program and assessing regional performance using a set of short-, medium-, and long-term outcomes.<sup>19</sup> We compared CWMD's planned approach with 13 key practices and 29 supporting actions for using evidence to more effectively manage and assess the results of federal programs.<sup>20</sup> These 13 practices are divided into four interrelated topic areas: (1) plan for results, (2) assess and build evidence, (3) use evidence, and (4) foster a culture of learning and continuous improvement.

In our analysis, we found that CWMD's planned approach for assessing STC program performance generally follows eight of the 13 key practices and partially follows five of the practices, as shown in figure 4. Furthermore, we found that CWMD is incorporating 24 of the 29 key actions that support implementing the 13 key practices. As CWMD is in the early stages of implementing its planned assessment approach, our assessments of the key practices that it is partially following could be more fully realized as CWMD continues these efforts.

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<sup>19</sup>Department of Homeland Security, Countering Weapons of Mass Destruction Office, *Securing the Cities Implementation, Fiscal Year 2023 Report to Congress* (June 29, 2023).

<sup>20</sup>[GAO-23-105460](#).

**Figure 4: Analysis of the Countering Weapons of Mass Destruction Office’s Approach for Assessing Securing the Cities Regions’ Performance Compared with Key Practices**

**Plan for results**



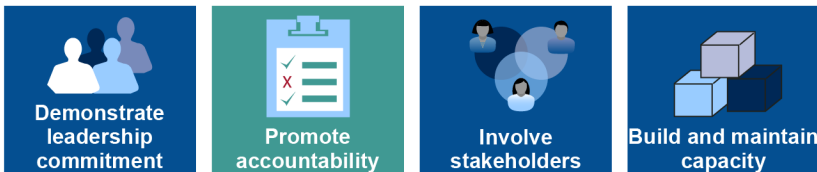
**Assess and build evidence**



**Use evidence**



**Foster a culture of learning and continuous improvement**



Generally following  
 Partially following

Sources: GAO analysis of Department of Homeland Security information; GAO (icons). | GAO-24-106922

**Accessible Text for Figure 4: Analysis of the Countering Weapons of Mass Destruction Office’s Approach for Assessing Securing the Cities Regions’ Performance Compared with Key Practices**

Topic Area	Key Practice	Overall Assessment
Plan for Results	Define goals	partially following
Plan for Results	Identify strategies and resources	generally following
Plan for Results	Assess the environment	generally following
Assess and Build Evidence	Assess the sufficiency of existing evidence	partially following
Assess and Build Evidence	Identify and prioritize evidence needs	generally following

Topic Area	Key Practice	Overall Assessment
Assess and Build Evidence	Generate new evidence	generally following
Use Evidence	Use Evidence to learn	partially following
Use Evidence	Apply learning to decision making	generally following
Use Evidence	Communicate learning and results	partially following
Foster a Culture of Learning and Continuous Improvement	Demonstrate leadership commitment	generally following
Foster a Culture of Learning and Continuous Improvement	Promote Accountability	partially following
Foster a Culture of Learning and Continuous Improvement	Involve stakeholders	generally following
Foster a Culture of Learning and Continuous Improvement	Build and maintain capacity	generally following

Sources: GAO analysis of Department of Homeland Security information; GAO (icons). | GAO-24-106922

Note: Each key practice has two to three key supporting actions. Key practices assessed as “generally following” incorporate each of the key actions for that respective key practice. Key practices assessed as “partially following” have incorporated at least one, but not all, of the supporting key actions for that respective key practice.

The following summarizes our assessment of the 13 key practices and 29 supporting key actions by topic area. See appendix I for a more detailed assessment of each key practice and supporting actions.

- Plan for results.** We found that CWMD’s planned approach is generally following two of the three key practices for this topic area and is fully incorporating seven of the eight supporting actions. CWMD is partially following the key practice of defining goals for the STC program. Actions taken by CWMD to implement this practice include using a logic model to assess how the program’s inputs, activities, and outputs support desired outcomes. This led it to adopt a new set of short-, medium-, and long-term outputs, outcomes, and performance measures in the 2023 revisions to STC implementation plan. However, though these outcomes and performance measures align with STC program phases and objectives, CWMD has not fully aligned them at the regional level. For example, the STC regions’ implementation plans that we reviewed include the impact measures from the initial 2021 STC implementation plan. CWMD officials told us they will work with the regions in fiscal year 2024 to amend or supplement the performance sections of their plans to incorporate the revised set of performance measures. By ensuring that the performance sections of regions’ implementation plans align with the revised set of performance measures and outcomes, CWMD will be in a better position to assess regional performance.

- **Assess and build evidence.** We found that CWMD's planned approach is generally following two of the three key practices for this topic area and is fully incorporating six of the seven supporting actions. CWMD is partially following the key practice of assessing the sufficiency of existing evidence. Actions CWMD has taken to implement this practice include identifying key questions to be addressed, such as by participating in a DHS evaluability assessment for the STC program and its 2023 implementation plan.<sup>21</sup> The assessment helped CWMD better understand the gaps in information needed to evaluate STC program performance and concluded it was ready to proceed with implementing its planned approach. However, CWMD has not fully incorporated the key action of assessing the coverage and quality of the evidence being collected from the regions. CWMD's internal assessments, as well as the DHS evaluation, found that the program's ability to assess regional performance was limited, due to inconsistent and incomplete information being reported by the regions. CWMD has taken steps to address this limitation by revising its quarterly reporting templates and including instructions. CWMD officials acknowledged the importance of having quality data to assess regions' performance. They stated that CWMD is working to determine how additional staff could improve CWMD's ability to monitor and review the consistency, completeness, and accuracy of this information.
- **Use evidence to learn.** We found that CWMD is generally following one and partially following two of the key practices for this topic area, while incorporating four of the six supporting actions. CWMD is partially following the key practice of communicating results. Actions taken to implement this practice include tailoring information to meet stakeholder needs, such as through the weekly or biweekly meetings and monthly webinars with the regions. This frequent and regular communication provides CWMD with the opportunity to engage with the regions to understand how well they are performing and deciding on the actions needed to further improve their progress.

However, we found that CWMD has not fully taken actions to clearly communicate and inform interested stakeholders about the STC regions' performance and progress. CWMD issued its revised set of performance measures and outcomes in June 2023, but we found that

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<sup>21</sup>An evaluability assessment is a systematic process for determining whether a program evaluation is justified, feasible, and likely to provide useful information. See Department of Homeland Security, Homeland Security Operation Analysis Center, *Countering Weapons of Mass Destruction Securing the Cities Program, Evaluability Assessment*, PRJ-A2401-07 (Sept. 2023).

CWMD had not clearly communicated expectations to the regions about how they would be assessed using this revised approach. For instance, in our interviews with regions starting in October 2023, nearly all of the regional officials told us they were not familiar with the new plan or how CWMD was planning to use it to assess their performance. Subsequently, CWMD included information about the new measures at its January 2024 semiannual meeting and plans for additional outreach.

Additionally, CWMD does not routinely issue reports or make information on regional or program performance available to external entities, with the only assessment of the program issued by CWMD in 2022. Moreover, CWMD does not have a documented plan for making the results of its planned assessments under the revised implementation plan available to the regions, Congress, and other outside entities. As CWMD proceeds with its planned approach for assessing STC regions' performance, communicating its performance expectations to the regions and the results of its assessments to outside entities, such as Congress, would increase accountability for how the program is being implemented. Doing so would also demonstrate how the STC program is meeting its mission, which could help the regions in their efforts to recruit and keep partner agencies engaged as they proceed with expanding their programs.

- **Foster a culture of learning and continuous improvement.** We found that CWMD is generally following three of the four key practices for this topic area and is fully incorporating seven of the eight supporting actions. For example, CWMD leadership has demonstrated a commitment to improve program performance through attending the STC program's semiannual meetings and actively soliciting feedback from the regions to identify and address challenges that may be affecting their progress and achieving desired results. However, CWMD has not fully incorporated all of the key actions for this topic area, as it has not demonstrated that it is currently using the evidence being collected from the regions to hold them accountable for their performance and results. This action could be satisfied, if CWMD follows its plans to begin assessing regions' performance against the performance targets and benchmarks in fiscal year 2025, along with developing plans to address results that fall short of those goals.

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## CWMD Plans to Begin Assessing Regional Progress Using Its Revised Set of Performance Outcomes and Measures by Fiscal Year 2025

The Countering Weapons of Mass Destruction Act of 2018 required CWMD to assess the effectiveness of the STC program based on the performance metrics and milestones in its initial implementation plan from 2021. CWMD completed this assessment in 2022.<sup>22</sup> CWMD's assessment found that the five legacy regions were effectively implementing the program, but it also concluded that CWMD lacked consistent, complete, and accurate information needed to evaluate the eight newer regions that joined the STC program in 2020. Based on the findings in the 2022 assessment, along with other reviews, CWMD determined it needed to revise the approach adopted in the initial 2021 STC implementation plan and establish a new set of outcome- and output-based performance measures.<sup>23</sup>

As noted earlier, the 2023 revisions to the implementation plan established a new set of short-, medium-, and long-term outputs and outcomes along with associated quantitative performance measures. They also included measurable performance targets and benchmarks that the plan states should enable CWMD to better understand the progress of each STC region. The STC implementation plan also indicated that these measures will be considered in CWMD's decision-making process for determining funding and when a region is ready to enter the next program phase. The time frames for the measures are short term (1 to 2 years), medium term (3 to 4 years), and long term (4 to 6 years), which generally align with STC program phases. Examples of the outcomes and associated performance measures are shown in table 1.

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<sup>22</sup>Pub. L. No 115-387, § 2(a)(10), 132 Stat. 5162, 5164. Department of Homeland Security, Countering Weapons of Mass Destruction Office, *The Securing the Cities Program Assessment Report, Fiscal Year 2022 Report to Congress* (Aug. 29, 2022). The act also required the assessment to include proposals for any changes to the STC program, including an explanation of how those changes align with the strategy and goals of the STC program and, as appropriate, address any challenges faced by the STC program.

<sup>23</sup>See, for example, Countering Weapons of Mass Destruction Office, Nexight Group, *Independent Verification and Validation of Performance Measure Data, FY2022 Review and Report of Findings* (Oct. 2022).



**Table 1: Examples of Outcomes and Performance Measures in CWMD’s STC Implementation Plan**

<b>Outcome time frames</b>	<b>Examples of outcomes</b>	<b>Examples of performance measures</b>
Short term (1–2 years)	Training and equipment meet the needs of the STC region	Percentage of law enforcement and first responders trained meets the need of the STC region
Short term (1–2 years)	Training and equipment meet the needs of the STC region	Increase in law enforcement and first responders’ knowledge of detection equipment and protocols
Medium term (3–4 years)	Law enforcement and first responders are prepared and feel confident in their ability to detect radiological or nuclear materials	Percentage of law enforcement and first responders who complete primary and secondary screener refresher training
Medium term (3–4 years)	Law enforcement and first responders are prepared and feel confident in their ability to detect radiological or nuclear materials	Percentage of law enforcement and first responders who demonstrate skills through primary and secondary screening drills
Long term (4–6 years)	State, local, territorial, and tribal operational partners have sustained capabilities to detect and prevent terrorist attacks that utilize radiological or nuclear materials	Percentage of STC regions which move into Phase IV (Sustainment) of the program within 6 years
Long term (4–6 years)	State, local, territorial, and tribal operational partners have sustained capabilities to detect and prevent terrorist attacks that utilize radiological or nuclear materials	Percentage of target goals the STC region meets overall

Source: GAO summary of the Countering Weapons of Mass Destruction Office’s (CWMD) 2023 Securing the Cities (STC) Implementation Plan. | GAO-24-106922

CWMD is in the early stages of initiating the assessment approach adopted in the 2023 revision to its implementation plan. CWMD officials told us they will not begin using the quantitative performance measures to assess regional performance and progress before fiscal year 2025. They told us they would be analyzing quarterly performance data collected from the regions in fiscal years 2023 and 2024 to establish the percentage targets and benchmarks for the new performance measures. Once the data are analyzed and targets are set, the officials indicated they would then begin discussing data and trends at the weekly or biweekly meetings, as well as during annual program management reviews conducted with each region. CWMD officials stated that in the interim, they will continue to informally monitor and discuss regional performance through their ongoing periodic outreach activities, reviewing quarterly reports, and reviewing after action reports submitted following the completion of regional tabletop and full-scale exercises. While CWMD is in the process of improving its assessment approach by sharing and discussing regional results compared with the new targets and benchmarks, there are some uncertainties in the approach. For example, CWMD officials are uncertain whether they will be assessing regions’ performance on a weekly, quarterly, or annual basis.

In addition to CWMD's efforts to better use evidence in its management and oversight of the STC program, officials stated the program also needs to do a better job of ensuring that regions meet planning and reporting requirements and determining regions' progress through program phases. These areas for improvement include the following:

- **Planning and reporting.** The cooperative agreements and the STC program phases include time frames for regions to develop and complete various plans for implementing their programs. However, our work has shown that CWMD has not been monitoring the regions to ensure that they are complying with these requirements. For example, the cooperative agreements require that a plan for sustaining the regional program should initially be drafted within the first 2 years of joining the STC program. In our review, we found that seven of the regions that entered the program in 2020 have either not started or completed developing their respective plans within this time frame. Moreover, one region had not completed drafting any of the required planning documents within this 2-year period.
- **Phase determination and documentation.** In our interviews with officials from the STC regions, we found that many were uncertain what program phase they were in, the date they entered that phase, or the dates when they anticipated transitioning to the next phase. We similarly asked CWMD officials to provide this information, but they stated the program had not been routinely tracking this information or formally documenting these decisions. To help address this issue, CWMD asked regions to develop and update a plan of action and milestone tracker as part of their quarterly performance reporting. To date, CWMD officials stated that they have not been actively monitoring and engaging with the regions about the dates and status of their milestone trackers but intend to follow these more closely going forward. Furthermore, CWMD officials stated in 2024 that they are prioritizing improving the consistency and documentation of the phase determinations. The officials told us that the proposed improvements include documenting phase changes with a formal memo to the STC region and refining the criteria and milestones for advancement through the program phases.

In discussing the need for CWMD to improve oversight of the regions, CWMD officials identified staffing challenges as part of the reason they are having difficulty ensuring that regions develop and update required planning documentation and report consistent, complete, and accurate information. CWMD officials told us that it will continue to be challenging to effectively oversee the regions' reporting, as the office does not currently expect additional staff in the near term.

Federal standards for internal control call for management to use quality information to achieve the goals and objectives of a program.<sup>24</sup> Quality information is appropriate, current, complete, accurate, accessible, and provided on a timely basis. By regularly tracking and reviewing the quarterly performance and progress information reported by the regions, CWMD will be better informed about their activities and where improvements are needed. When CWMD begins formally assessing regions' performance on a regular basis, it will have the increased ability to use evidence in its decision-making and management of the STC program. Further, as reflected in our key practices, these actions will also enhance CWMD's ability to use evidence in holding regions accountable for their timely progress through program phases and to ensure that regions comply with program planning and reporting requirements and are achieving and sustaining the program's goals and objectives.

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## Conclusions

CWMD has taken multiple steps to strengthen its STC program to ensure that high-risk urban areas and their surrounding regions have the resources to develop and sustain the capabilities needed to detect and deter the threat of an attack using nuclear or radiological materials. As CWMD is in the process of implementing its approach for assessing the program's performance, opportunities exist for it take additional actions to increase accountability for results being achieved through the program and to communicate those results to stakeholders.

Specifically, CWMD can work to ensure that its approach fully follows key practices for building and using evidence to manage and evaluate the results of federal efforts by clearly communicating to the STC regions about performance expectations and how they will be assessed on the outcomes and quantitative metrics in its 2023 implementation plan. It can also better track and use quality information in its assessments of regional performance. These two steps will put CWMD in a better position to use evidence to manage the STC program more effectively; demonstrate achievements in meeting the program's mission; and communicate these results to outside stakeholders, including agency partners and Congress.

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<sup>24</sup>GAO, *Standards for Internal Controls in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 2014).

Moreover, CWMD could do more to work with the regions to make sure they progress through program phases in a timely manner, such as ensuring that plans are developed and updated as required and formally documenting decisions on advancement to the next program phase. Doing so would enable CWMD to better guide the regions toward achieving and sustaining the goal of fully operational detection capabilities.

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## Recommendations for Executive Action

We are making the following five recommendations to CWMD:

The Assistant Secretary of CWMD should ensure that the performance sections of regions' implementation plans align with the revised set of performance measures and outcomes. (Recommendation 1)

The Assistant Secretary of CWMD should clearly communicate performance expectations to the STC regions for how they will be assessed. (Recommendation 2)

The Assistant Secretary of CWMD should regularly communicate the results of its assessments to the regions and outside entities, such as Congress. (Recommendation 3)

The Assistant Secretary of CWMD should ensure that the STC regions are reporting timely, consistent, complete, and accurate information in their quarterly performance reports. (Recommendation 4)

The Assistant Secretary of CWMD should formally track and document information on regions' progress toward achieving program phases and goals. (Recommendation 5)

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## Agency Comments

We provided a draft of this report to the Department of Homeland Security for review and comment. DHS provided written comments on the draft, which are reproduced in appendix II, and technical comments, which we incorporated as appropriate. In its response to our draft report, DHS concurred with all five of our recommendations and identified actions it will take to address them.

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

If you or your staff have any questions concerning this report, please contact me at (202) 512-3841 or [bawdena@gao.gov](mailto:bawdena@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.

A handwritten signature in black ink, appearing to read "Allison Bawden". The signature is fluid and cursive, with a long horizontal stroke at the end.

Allison Bawden  
Director, Natural Resources and Environment

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*List of Committees*

The Honorable Gary C. Peters  
Chairman  
The Honorable Rand Paul, M.D.  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Chris Murphy  
Chair  
The Honorable Katie Britt  
Ranking Member  
Subcommittee on Homeland Security  
Committee on Appropriations  
United States Senate

The Honorable Mark E. Green, M.D.  
Chairman  
The Honorable Bennie G. Thompson  
Ranking Member  
Committee on Homeland Security  
House of Representatives

The Honorable Dave Joyce  
Chair  
The Honorable Henry Cuellar  
Ranking Member  
Subcommittee on Homeland Security  
Committee on Appropriations  
House of Representatives

# Appendix I: Assessment of the Countering Weapons of Mass Destruction Office's Approach Compared with 13 Key Practices

On the basis of our previous work, GAO developed a guide that identifies 13 key practices that can help federal leaders and employees develop and use evidence to effectively manage and assess results of federal efforts.<sup>1</sup> These 13 practices are divided into four interrelated topic areas: (1) plan for results, (2) assess and build evidence, (3) use evidence, and (4) foster a culture of learning and continuous improvement. The key practices were distilled from hundreds of actions identified in GAO's past work as effective for implementing federal evidence-building and performance management activities. The key practices provide guidance for gathering and analyzing evidence, as well as assessing performance and progress toward achieving federal programs' goals. The guide also provides further details about the 13 key practices, including 29 key actions to implement the practices and related examples of how they have been implemented by one or more federal agencies.

For this report, we compared the Department of Homeland Security's Countering Weapons of Mass Destruction Office's (CWMD) planned approach for assessing performance of the Securing the Cities (STC) program with the 13 key practices. We primarily focused our analysis on the performance assessment approach established by CWMD in its June 2023 revision to the STC Program Implementation Plan.<sup>2</sup> We also considered other supplemental documents and information provided by CWMD.

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<sup>1</sup>GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023).

<sup>2</sup>Department of Homeland Security, Countering Weapons of Mass Destruction Office, *Securing the Cities Implementation, Fiscal Year 2023 Report to Congress* (June 29, 2023).

**Appendix I: Assessment of the Countering Weapons of Mass Destruction Office's Approach Compared with 13 Key Practices**

In our assessment, we found that CWMD was generally following or partially following all of the 13 key practices.<sup>3</sup> In addition, as shown in table 2, we found that CWMD was implementing 24 of the 29 key actions that comprise the 13 key practices.

**Table 2: Assessment of the Countering Weapons of Mass Destruction Office's Approach to Assessing Securing the Cities Program Performance Compared with Key Practices**

Topic area	Key practice	Key actions	Individual assessment	Overall assessment
Plan for results	Define goals	Define goals for all activities	fully implemented	partially following
Plan for results	Define goals	Identify both long-term outcomes and near-term goals	fully implemented	partially following
Plan for results	Define goals	Align goals across organizational levels	not fully implemented	partially following
Plan for results	Identify strategies and resources	Identify strategies for each goal	fully implemented	generally following
Plan for results	Identify strategies and resources	Coordinate with other organizations, programs, and activities contributing to the goal, when applicable	fully implemented	generally following
Plan for results	Identify strategies and resources	Identify the resources needed to achieve each goal	fully implemented	generally following
Plan for results	Assess the environment	Identify internal and external factors that could affect goal achievement	fully implemented	generally following
Plan for results	Assess the environment	Define strategies to mitigate the factors	fully implemented	generally following
Assess and build evidence	Assess the sufficiency of existing evidence	Identify key questions to address	fully implemented	partially following
Assess and build evidence	Assess the sufficiency of existing evidence	Identify relevant internal and external sources of evidence	fully implemented	partially following
Assess and build evidence	Assess the sufficiency of existing evidence	Assess the coverage and quality of the evidence	not fully implemented	partially following
Assess and build evidence	Identify and prioritize evidence needs	Identify new evidence needs	fully implemented	generally following
Assess and build evidence	Identify and prioritize evidence needs	Prioritize how and when to fulfill those needs	fully implemented	generally following
Assess and build evidence	Generate new evidence	Develop an evidence-building implementation plan	fully implemented	generally following

<sup>3</sup>We used the following scale for our assessment of CWMD's approach: *generally following*, if it incorporates each key action for the respective key practice; *partially following*, if it incorporates at least one, but not all, of the key actions for the respective practice; and *is not following*, if it does not incorporate any of the key actions for the respective key practice.



**Appendix I: Assessment of the Countering  
Weapons of Mass Destruction Office's  
Approach Compared with 13 Key Practices**

<b>Topic area</b>	<b>Key practice</b>	<b>Key actions</b>	<b>Individual assessment</b>	<b>Overall assessment</b>
Assess and build evidence	Generate new evidence	Ensure that new evidence will meet quality standards	fully implemented	generally following
Use evidence	Use evidence to learn	Assess progress toward goals	not fully implemented	partially following
Use evidence	Use evidence to learn	Develop an understanding of why results were achieved	fully implemented	partially following
Use evidence	Apply learning to decision-making	Use evidence to inform management decisions	fully implemented	generally following
Use evidence	Apply learning to decision-making	Identify any additional evidence needs to further inform decisions	fully implemented	generally following
Use evidence	Communicate learning and results	Communicate relevant information internally and externally	not fully implemented	partially following
Use evidence	Communicate learning and results	Tailor the information to meet stakeholders' needs	fully implemented	partially following
Foster a culture of learning and continuous improvement	Demonstrate leadership commitment	Involve senior leaders	fully implemented	generally following
Foster a culture of learning and continuous improvement	Demonstrate leadership commitment	Coordinate and integrate activities	fully implemented	generally following
Foster a culture of learning and continuous improvement	Promote accountability	Assign responsibility	fully implemented	partially following
Foster a culture of learning and continuous improvement	Promote accountability	Hold individuals accountable for learning and results	not fully implemented	partially following
Foster a culture of learning and continuous improvement	Involve stakeholders	Engage stakeholders early and often	fully implemented	generally following
Foster a culture of learning and continuous improvement	Involve stakeholders	Tailor engagement based on needs and purpose	fully implemented	generally following
Foster a culture of learning and continuous improvement	Build and maintain capacity	Assess sufficiency of existing evidence-building capacity	fully implemented	generally following
Foster a culture of learning and continuous improvement	Build and maintain capacity	Identify actions to maintain or enhance capacity	fully implemented	generally following

✓ = action fully implemented X = action not fully implemented

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● = generally following ◐ = partially following ○ = not following

Source: GAO analysis of Department of Homeland Security information. | GAO-24-106922

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# Appendix II: Comments from the Department of Homeland Security

**Appendix II: Comments from the Department  
of Homeland Security**

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



March 11, 2024

Allison Bawden  
Director, Natural Resources and Environment  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-24-106922, "NUCLEAR  
TERRORISM PREVENTION: DHS Has Strengthened the Securing the Cities  
Program, but Actions are Needed to Address Key Remaining Challenges"

Dear Ms. Bawden:

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

DHS leadership is pleased to note GAO's recognition of the Department's Countering Weapons of Mass Destruction Office (CWMD) efforts to strengthen the Securing the Cities (STC) program by incorporating lessons learned from past implementation and working to address remaining program implementation challenges. Specific areas of improvement cited included measurable increases in outreach to state and local stakeholders; refined guidance for planning, reporting, and tracking progress; and adding strategy and funding for long-term sustainment of the program's regional capabilities.

In addition, GAO (1) found that most of the 13 STC regional officials interviewed said that they appreciated the "open door" approach CWMD fostered, and the flexibility to keep in touch with their assigned federal program managers as frequently as needed to get assistance, and (2) highlighted a real-world example where the STC Program led to one of the STC Houston region's local agency partners largest discovery of abandoned radiological material ever. DHS remains committed to protecting the Homeland from weapons of mass destruction (WMD) and chemical, biological, radiological, and nuclear (CBRN) threats.

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The draft report contains five recommendations with which the Department concurs. Enclosed is our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

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

Sincerely,

JIM H CRUMPACKER

Digitally signed by JIM H  
CRUMPACKER  
Date: 2024.03.11 14:03:46 -04'00'

JIM H. CRUMPACKER  
Director  
Departmental GAO-OIG Liaison Office

Enclosure

**Enclosure: Management Response to Recommendations  
Contained in GAO-24-106922**

GAO recommended that the Assistant Secretary of CWMD:

**Recommendation 1:** Ensure that the performance sections of the regions' implementation plans align with the revised set of performance measures and outcomes.

**Response:** Concur. During fiscal year (FY) 2024, CWMD's Operations Support Directorate (OSD) Program Support Division (PSD) STC National Program Management Office (NPMO) will collect and analyze FY 2023 and FY 2024 performance inputs from regions in order to establish baseline metric targets, and will also continue to socialize the performance measures and outcomes in the 2023 revisions to the "Securing the Cities Implementation Plan" (STC Implementation Plan)<sup>1</sup> with the regions. In addition, CWMD OSD/PSD/NPMO will ensure these revised performance measures are integrated into the performance section of the regions' respective plans when implemented in FY 2025. Estimated Completion Date (ECD): January 31, 2025.

**Recommendation 2:** Clearly communicate performance expectations to the STC regions for how they will be assessed.

**Response:** Concur. During FY 2024, CWMD's OSD/PSD/NPMO will meet with each region individually to discuss their performance and targets to incorporate their feedback into the regional assessment process. Once finalized, CWMD's OSD/PSD/NPMO will then socialize targets with the regions and clearly communicate finalized performance expectations. ECD: January 31, 2025.

**Recommendation 3:** Regularly communicate the results of its assessment to the regions and outside entities such as Congress.

**Response:** Concur. Once the performance metric targets for regions are established and the appropriate amount of data has been collected to assess performance, CWMD's OSD/PSD/NPMO will share quarterly data with the regions during their regularly scheduled meetings and Program Management Reviews. CWMD's OSD/PSD/NPMO will also share its assessment results with Congress on annual basis as an appendix to the STC Implementation Plan. ECD: March 31, 2025.

<sup>1</sup> Initially released June 2021; updated June 2023 (second version)

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**Appendix II: Comments from the Department  
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**Recommendation 4:** Ensure that the STC regions are reporting timely, consistent, complete, and accurate information in their quarterly performance reports.

**Response:** Concur. On February 22, 2024, CWMD's OSD/PSD/NPMO created a quarterly reporting checklist that ensures regional quarterly submissions are timely, consistent, complete, and accurate. Further, if the report is not in compliance, the checklist asks additional questions of the reviewer to ensure it is escalated appropriately and addressed. CWMD's OSD/PSD/NPMO continues to refine this checklist as it analyzes program performance data received by STC regions, and will create a process for incorporating the checklist into all reviews. ECD: June 28, 2024.

**Recommendation 5:** Formally track and document information on regions' progress toward achieving program phases and goals.

**Response:** Concur. During FY 2024, CWMD's OSD/PSD/NPMO will formalize the tracking and documentation of regions' progress toward achieving program phases and goals. In addition to establishing a formal memo for communicating a region's phase change, CWMD's OSD/PSD/NPMO will also provide more refined criteria and milestones to include checklists for document approvals. ECD: September 30, 2024.

# Accessible Text for Appendix II: Comments from the Department of Homeland Security

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Director, Natural Resources and Environment  
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## Appendix III: GAO Contact and Staff Acknowledgments

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### GAO Contact

Allison Bawden at (202) 512-3841 or [bawden@gao.gov](mailto:bawden@gao.gov).

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### Staff Acknowledgments

In addition to the contact named above, Ned Woodward (Assistant Director), Michael Meleady (Analyst in Charge), Antoinette Capaccio, Benjamin Licht, Amanda Miller, Matt McLaughlin, Sara Sullivan, and Matthew Whalen made key contributions to this report.



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