

**Congress of the United States**  
**Washington, DC 20515**

April 26, 2022

The Honorable Lucille Roybal-Allard  
Chairwoman  
House Appropriations Subcommittee on  
Homeland Security  
2006 Rayburn House Office Building  
Washington, DC 20515

The Honorable Chuck Fleischmann  
Ranking Member  
House Appropriations Subcommittee on  
Homeland Security  
1036 Longworth House Office Building  
Washington, DC 20515

Dear Chairwoman Roybal-Allard and Ranking Member Fleischmann:

Thank you for your work to write this year's Homeland Security appropriations bill. We write to respectfully request that the Committee support report language establishing greater transparency measures over the Department of Homeland Security's (DHS) Center for Prevention Programs and Partnerships (CP3).

In May 2021, DHS established CP3, which supports its targeted violence and terrorism prevention efforts. CP3 evolved from the Countering Violent Extremism (CVE) initiatives that discriminatorily targeted Muslims in an attempt to identify individuals who might commit a terrorist attack. Department officials have rightly acknowledged that CVE was a biased program, premised on the islamophobic assumption that "individuals who are high risk were coming from specific religious and ethnic communities," and have asserted that CP3 represents a rejection of the CVE framework.

The stated commitment to reject failed approaches is welcome. In practice, however, CP3 expands the core CVE prevention model rather than jettisons it: CP3 efforts now apparently focus on a broader range of violence than only terrorism associated with Muslims, exposing even more communities to the risks it generates. Like CVE, the CP3 model employs ill-defined and commonplace phenomena among individuals — for example, social alienation, mood swings, having a "grievance" or "extremist" view — as predictors of future violence, raising the specter of reporting based on constitutionally-protected activism or racial and religious stereotypes that inform who is perceived as threatening. Like CVE, CP3 tasks state and local stakeholders (police, public safety agencies, community groups, universities, and others) with working together to identify and intervene with people experiencing such conditions, putting law enforcement between people and the help they may need. As recently as 2020, after the Department had formally abandoned the label "CVE," it noted that such targeted violence and terrorism prevention efforts were "filling a gap where law enforcement or intelligence cannot operate because of constitutionally based civil rights and liberties."

In 2021, Congress provided more than \$80 million to activities under the broader umbrella of targeted violence and terrorism prevention, but more information is needed to justify continued funding for such initiatives, especially since they generate serious civil rights and liberties risks and have never been shown to prevent violence. As further detailed in the draft report language:

- **Efficacy.** An independent, third-party accounting of whether the CP3 model has been shown to achieve its stated goal: preventing violence. Indeed, some of the government-funded studies the Department cites as support for the program clearly state that it is not possible to reliably identify in advance people who may commit violence (for example, “because there are no unambiguous early indicators of future violent behavior, the performance of risk assessment tools and methods to distinguish individuals who appear to be threats from those who actually do pose a threat is limited”). Despite DHS’s claims that these programs are successful, the agency’s evaluations rely on performance metrics that are unconnected to violence reduction, focusing instead on the reach of a program or the degree to which a grantee has fulfilled funding conditions, while simply presupposing that violence reduction will follow if the Department’s prevention framework is implemented.
- **Impact.** CP3’s predecessor programs overtly targeted Muslim, Arab, and South Asian communities. More clarity is necessary on how CP3 is currently being targeted, and a full accounting of the impacts it is having as administered, based largely on data the Department has committed to collect in public grant proposal documents.
- **Civil Rights and Liberties.** The Department says that it intends to safeguard civil rights and liberties as it carries out CP3 efforts, but it has not specified how it is doing so. More detail regarding the nature of these civil rights and liberties protections is required.

It’s essential that the kinds of violence prevention strategies we fund are effective. By allowing CP3 to continue without robust transparency requirements and public civil rights and liberties safeguards, we risk sowing distrust and causing further harm to some of the communities most in need of support in our country — including children, people with disabilities, immigrants, and families facing poverty. We ask you to support these reporting requirements, so Congress and DHS can make more informed decisions about CP3 in the future.

We urge the subcommittee to include the following report language for the FY 2023 appropriations cycle for the Department of Homeland Security’s Center for Prevention Programs and Partnerships (CP3):

**Report Language Request #1:**

*Center for Prevention Programs and Partnerships (CP3).*—Not later than 180 days after the date of enactment of this Act, and annually thereafter, CP3 shall submit to the Committee and make publicly available online a report containing the following:

1. For each risk factor, indicator, or other sign of potential violence used in DHS Countering Violent Extremism (CVE), Targeted Violence and Terrorism Prevention (TVTP), and CP3 programs, including grant-funded activities:
  - a. the form of potential threat it pertains to, for example, targeted violence or terrorism, divided by threat category, such as racially or ethnically motivated violent extremism, and sub-category, such as white supremacist violence or black separatist violence, as appropriate; and
  - b. citations to peer-reviewed research validating its predictive value and whether the federal government has funded or supported the cited research.

2. A description of all procedural and substantive privacy, civil rights, and civil liberties protections applicable to CP3 programs, whether administered directly by the Department, through grant recipients, or by other third parties, and a detailed description of how CP3 monitors grant recipient compliance with federal civil rights laws pursuant to 44 C.F.R. Part 7, as well as of any other applicable statutory or regulatory provisions.
3. Beginning with the fiscal year 2020 grant cycle, detailed descriptions of:
  - a. the operative policies for award decisions for each cycle, including the specific criteria for awarding grants and how they were applied; and
  - b. the performance metrics and evaluation criteria for grant recipients for each cycle.
4. For each grant award for the most recent fiscal year cycle and for prior year awards still within their period of performance:
  - a. a list of all subgrantees and any entities that participate in grant-funded programs without receiving grant funding;
  - b. the particular forms of terrorism or violent extremism, divided by threat category and sub-category as appropriate, and targeted violence prevention addressed by each grant;
  - c. the population demographics of the jurisdiction where each grantee will be implementing grant funded activities;
  - d. descriptions of any third-party complaints related to the grant-funded activities of the grantee;
  - e. detailed, summarized evaluations based on evaluation criteria and performance metrics; and
  - f. in particular, for each grant award that supports threat assessment and management teams:
    - i. the number, professional backgrounds, and organizational affiliations of members of the associated threat assessment and management team(s);
    - ii. the identified risk factor(s), behavioral changes, extremist ideologies (if any); and grievances (if identified) for each opened case;
    - iii. the number of referrals for mental health, substance abuse, job skills, housing assistance, or other services; and
    - iv. the number of federal, state, and local criminal inquiries opened as a result of referrals from an associated threat assessment and management team, disaggregated by investigating agency, type of inquiry, federal investigative classification, terrorism classification and sub-classification, including information on violent extremism threat category and sub-category, and subsequent law enforcement action.

**Report Language Request #2:**

*Center for Prevention Programs and Partnerships (CP3).*—Not later than one year after the date of enactment of this Act, and annually thereafter, CP3 shall submit to the Committee and make publicly available online a report containing the following:

1. Disclosure of any correspondence or engagements involving CP3 staff, whether or not solicited and with Personally Identifiable Information (PII) omitted or redacted, pertaining to specific individuals identified as of-concern by state or local partners, if any, and a description of any DHS follow-up action, referral, or recommendations given, if any.
2. A description of the nature of PII received, if any, from engagements or grantees or otherwise collected by CP3, through personnel such as local prevention officers or other means.

Thank you for your consideration of these requests.

Sincerely,



RASHIDA TLAIB  
Member of Congress



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