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**THESIS**

**DEFEATING AND DETERRING DOMESTIC TERRORISM  
THROUGH EVIDENCE-BASED POLICYMAKING**

by

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September 2022

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**DEFEATING AND DETERRING DOMESTIC TERRORISM THROUGH  
EVIDENCE-BASED POLICYMAKING**

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## **ABSTRACT**

This thesis investigates how evidence-based policymaking can be employed to improve policy decisions and resource allocations aimed at deterring and defeating domestic terrorism. The executive and legislative branches of government have mandated that evidence-based policymaking be implemented in federal governmental decisional processes, including the National Strategy for Countering Domestic Terrorism. However, there is no federal guidance that specifies how to use evidence and data to combat domestic terrorism. This thesis investigates the numerous challenges of using evidence in domestic counterterrorism initiatives and analyzes three case studies to provide recommendations for an integrated approach to the implementation of the Strategy. The findings of this thesis supplement OMB's guidance on the four components of evidence-based policymaking. Among others, it recommends that the government should institute standardized data collection, provide improved guidelines, generate a cadre of professionals trained in evaluation, establish evidence-based policymaking centers of excellence, designate a bipartisan Congressionally mandated oversight office, and create a repository that captures the methodologies and results of ongoing and completed evidence-based programs for countering domestic terrorism.

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## EXECUTIVE SUMMARY

Both the executive and legislative branches of government have mandated that evidence-based policymaking be implemented in federal governmental decisional processes.<sup>1</sup> Evidence-based policymaking is the theory that governments should develop “public policies, programs, and practices that are grounded in empirical evidence.”<sup>2</sup> In alignment with this direction, the 2021 *National Strategy for Countering Domestic Terrorism* cites that it “will ensure that its counter-domestic terrorism prevention efforts are *driven by data* [and will fund] *evidence-based programs*” in support of those efforts.<sup>3</sup> Although evidence-based policymaking has been in use since the 1990s, it has primarily been used in healthcare and scientific research and the use of evaluation and evidence in counterterrorism has neither been researched nor implemented extensively.<sup>4</sup> The bipartisan passage of the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act) recognized that there was not enough data or evaluation being used in the government’s decisions and the effectiveness of policies and programs.<sup>5</sup> Following the Evidence Act, the Office of Management and Budget (OMB) released several memorandums to provide guidance to Departments in its implementation.<sup>6</sup> The Department of Homeland Security

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<sup>1</sup> Foundations for Evidence-Based Policymaking Act of 2018, *U.S. Code* 5 (2019) §§ 101 <https://www.congress.gov/bill/115th-congress/house-bill/4174>; Russell T. Vought, *Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance*, M-19-23 (Washington, DC: Office of Management and Budget, 2019), <https://www.whitehouse.gov/wp-content/uploads/2019/07/M-19-23.pdf>.

<sup>2</sup> *Britannica*, s.v. “evidence-based policy,” accessed January 17, 2022. <https://www.britannica.com/topic/evidence-based-policy>.

<sup>3</sup> National Security Council, *National Strategy for Countering Domestic Terrorism* (Washington, DC: White House, 2021), 20, <https://www.whitehouse.gov/wp-content/uploads/2021/06/National-Strategy-for-Countering-Domestic-Terrorism.pdf>.

<sup>4</sup> *Britannica*, ‘evidence-based policy.’; Cynthia Lum and Leslie W. Kennedy, *Evidence-Based Counterterrorism Policy* (New York: Springer, 2012).

<sup>5</sup> Foundations for Evidence-Based Policymaking Act of 2018

<sup>6</sup> Vought, Phase 1 Implementation of the Foundations.

released Directives 069–03 and 069–03–001 stating that “DHS is committed to ensuring a strong culture of evaluation, evidence building and organization learning” but they did not provide specific guidance on the steps needed to conduct an effective evaluation.<sup>7</sup> Moreover, neither the Department of Homeland Security nor the Department of Justice has identified countering domestic terrorism as a priority in its Learning Agenda despite the direction provided in the White House strategy. Currently, there is no federal guidance that specifies how to use evidence and data to combat domestic terrorism.

Despite the lack of specific guidance, using evidence in support of domestic counterterrorism is challenging due to several factors. There is a lack of literature that demonstrates repeatable and effective programs combating any type of terrorism.<sup>8</sup> Also, data collection is exacerbated by the relative rarity of domestic terrorism cases within western-based societies and that “domestic [terrorism] incident datasets have been virtually unavailable.”<sup>9</sup> Additionally, policymaking “is an inherently political process” with many variables that impact the final decision.<sup>10</sup> As Brian Head elaborates in his research, “political leaders often insist that measurable results be available in a short time-frame, leading to greater focus on visible activities rather building the foundations for sustainable benefits”—resulting in reduced effectiveness of the evidence-based process.<sup>11</sup> This can

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<sup>7</sup> Randolph D. Alles, *Program, Policy, and Organizational Evaluations*, DHS Directive 069–03 (Washington, DC: Department of Homeland Security, 2021), 1.

<sup>8</sup> Lum and Kennedy, *Evidence-Based Counterterrorism Policy*, 2012, 4.

<sup>9</sup> Richard E. Berkebile, “What Is Domestic Terrorism? A Method for Classifying Events from the Global Terrorism Database,” *Terrorism and Political Violence* 29, no. 1 (2017): 1, <https://doi.org/10.1080/09546553.2014.985378>.

<sup>10</sup> Sophie Sutcliffe and Julius Court, *Toolkit for Progressive Policymakers in Developing Countries* (London: Overseas Development Institute, 2006), 3.

<sup>11</sup> Brian W. Head, “Reconsidering Evidence-Based Policy: Key Issues and Challenges,” *Policy and Society* 29, no. 2 (2010): 84, <https://doi.org/10.1016/j.polsoc.2010.03.001>.



lead to “policy-based evidence” when “governments tend to use and promote those research findings which fit policies already decided upon [and] the role of research is more often one of legitimizing policy rather than ‘driving’ it.”<sup>12</sup> Finally, if evaluation methods are not conducted properly and/or bias is not accounted for, researchers can inadvertently include data that can potentially lead to discriminatory policy decisions.

This thesis first investigates the challenges of using evidence in value-based decisions and the social sciences. The second part of this thesis conducts three case study analyses of domestic and foreign policy initiatives—other than counterterrorism—with respect to the foundations of evidence-based policymaking. This analysis identifies common themes that guide recommendations on how to implement evaluation as one part of an integrated approach in the implementation of the *National Strategy for Countering Domestic Terrorism in the United States*.

This thesis supplements OMB’s guidance that “depicts and describes four interdependent components of evidence: foundational fact-finding, policy analysis, program evaluation, and performance measurement.”<sup>13</sup> OMB recommended that agencies consider these types of evidence in their activities but did not explicitly define or provide guidance on how to incorporate these four components of evidence-based policy. This thesis reviews different approaches by several organizations committed to incorporating evaluation in the use of decision-making and identifies more explicit steps to support OMB’s guidance. A synopsis of the recommendations from the case studies is organized under OMB’s four components and summarized in Table 1.

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<sup>13</sup> Vought, *Phase 1 Implementation of the Foundations*, 13.

Table 1. Recommendations Developed from the Case Studies

<b>Components of Evidence</b>	<b>Recommendation</b>
Foundational Fact Finding	The federal government should standardize data collection across all agencies, including federal, state, and local partners associated with countering domestic terrorism. Standardization will assist in transferable data and measuring the performance of policy initiatives.
Policy Analysis	Evidence-based policymaking agencies must establish a common methodology before beginning an intervention. The development of a common framework and guidelines may be useful in establishing consistency across agencies.
	Agencies should conduct an inventory and classify programs for feasibility and other criteria before implementing evidence-based approaches. Agencies should also review and leverage existing evaluation-based social science interventions from other Departments.
Performance Measurement	Program facilitators should ensure that efforts remain focused on the programmatic goals and not inadvertently shift to other metrics.
	All agencies should strive to avoid bias through effective evaluation design and robust data sets.
Program Evaluation	The Federal government can improve evidence-based policymaking efforts by hiring or training a cadre of professional evaluators who can review, compile and communicate the data effectively. The fusion of the data into a useful format is critical in implementing effective prevention and response techniques.
	Establish a bipartisan Congressionally mandated office within the Federal government that minimizes the impacts of changing Administrations and politically-driven decisions. The relatively short tenure of executive-level Administrations within the United States creates competing priorities that impact data-driven decisions. To avoid policy-based evidence, a bipartisan or politically independent organization may provide stability when leadership or the environment changes.
	The federal government should consider the creation of clearinghouses where existing evidence-based policy programs can be easily located and shared across other agencies with similar goals. This will also provide opportunities for agencies to mimic successful interventions while avoiding poorly developed methodologies.

<b>Components of Evidence</b>	<b>Recommendation</b>
All of the Dimensions	Develop a common framework and clear guidelines that provide detailed direction to federal agencies on how to properly apply evaluation in social issues. The United States should consider developing a comprehensive guide like the Magenta Guide used in the United Kingdom. <sup>14</sup>
	Fund private centers of excellence that can support the development and execution of agency-driven initiatives in an evidence-based approach. Until the Federal government can develop the expertise and talent within its agencies, private institutions should be considered for support, including health-based agencies that may have more experience with evaluation practices.

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<sup>14</sup> Her Majesty's Treasury, *Prudential Standards in the Financial Services Bill: Policy Statement* (London: UK Government, 2020), [https://www.webarchive.org.uk/access/resolve/20200311151411/https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/871680/Final\\_Budget\\_policy\\_statement\\_-\\_Basel\\_and\\_prudential\\_measures.pdf](https://www.webarchive.org.uk/access/resolve/20200311151411/https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/871680/Final_Budget_policy_statement_-_Basel_and_prudential_measures.pdf).

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# I. INTRODUCTION

## A. PROBLEM STATEMENT

Both the executive and legislative branches of government have mandated that evidence-based policymaking be implemented in federal governmental decisional processes.<sup>1</sup> Evidence-based policymaking is the theory that governments should develop “public policies, programs, and practices that are grounded in empirical evidence.”<sup>2</sup> Moreover, the 2021 *National Strategy for Countering Domestic Terrorism* specifically cites that it “will ensure that its counter-domestic terrorism prevention efforts are *driven by data* [emphasis added] and informed by community-based partners. The Department of Homeland Security also has increased the grant funding available in this area in support of *evidence-based programs* [emphasis added] and with transparency regarding their use.”<sup>3</sup>

Although evidence-based policymaking has been in use since the 1990s in the United Kingdom, it has primarily been used in healthcare and scientific research.<sup>4</sup> Employing evidence in other areas of policymaking, specifically social sciences like countering domestic terrorism, may result in unexpected challenges not fully envisioned by the Foundations for Evidence-Based Policymaking Act of 2018 (The Evidence Act).<sup>5</sup> For example, as outlined by Cynthia Lum and Leslie Kennedy, the use of evaluation and evidence in counterterrorism has neither been researched nor implemented extensively.<sup>6</sup> This thesis provides an opportunity to review the federal government’s efforts to “make well-informed decisions about policies, programs and projects by putting the best available

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<sup>1</sup> Foundations for Evidence-Based Policymaking Act of 2018; Vought, *Phase 1 Implementation of the Foundations*.

<sup>2</sup> *Britannica*, s.v. “evidence-based policy,” accessed January 17, 2022.  
<https://www.britannica.com/topic/evidence-based-policy>.

<sup>3</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*, 20.

<sup>4</sup> *Britannica*, “evidence-based policy.”

<sup>5</sup> Foundations for Evidence-Based Policymaking Act of 2018.

<sup>6</sup> Cynthia Lum and Leslie W. Kennedy, *Evidence-Based Counterterrorism Policy* (New York: Springer, 2012).

evidence from research at the heart of policy development and implementation” for countering domestic terrorism.<sup>7</sup>

Recently, the Secretary of Homeland Security recommissioned the office within the Department’s Office of Intelligence and Analysis to focus on domestic terrorism, but no formal guidance addresses using evidence and data to either improve policy decisions or apply resources that will deter or defeat malignant domestic actors.<sup>8</sup> Using evidence in support of domestic counterterrorism is challenging due to several factors. Primarily, there is a lack of available data—not only are attacks relatively rare, but domestic “terrorism is notoriously difficult to define.”<sup>9</sup> Differing definitions have created inconsistent statistics and “domestic [terrorism] incident datasets have been virtually unavailable.”<sup>10</sup> For example, several terrorism databases within the United States excluded domestic terrorism in the recordkeeping until recently—resulting in a lack of data for effective research and evaluation of domestic counterterrorism methods. As highlighted by Richard Berkebile, “the lack of comprehensive domestic data results in substantive questions remaining incompletely explored or completely unanswered.”<sup>11</sup> Brian Head expands on this issue by noting that “political leaders often insist that measurable results be available in a short time-frame, leading to greater focus on visible activities rather building the foundations for sustainable benefits”—resulting in reduced effectiveness of the evidence-based process.<sup>12</sup>

Neither the *National Strategy for Countering Domestic Terrorism*, nor any other federal guidance specifies how to use evidence to address sharing information more effectively, combat transnational aspects of domestic terrorism, understand recruitment

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<sup>7</sup> Philip Davies, “Is Evidence-Based Government Possible?” (Washington, DC, 2004), 3, <https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.545.364&rep=rep1&type=pdf>.

<sup>8</sup> “DHS Creates New Center for Prevention Programs and Partnerships and Additional Efforts to Comprehensively Combat Domestic Violent Extremism,” Press Releases, May 11, 2021, <https://www.dhs.gov/news/2021/05/11/dhs-creates-new-center-prevention-programs-and-partnerships-and-additional-efforts>.

<sup>9</sup> Berkebile, “What Is Domestic Terrorism?,” 5.

<sup>10</sup> Berkebile, 1.

<sup>11</sup> Berkebile, 2.

<sup>12</sup> Head, “Reconsidering Evidence-Based Policy,” 84.



and mobilization, and identify effective legislative reforms.<sup>13</sup> This thesis provides an opportunity to assist federal and community-based partners in developing a framework to use evidence in achieving the four pillars outlined in the *National Strategy for Countering Domestic Terrorism*.

## **B. RESEARCH QUESTION**

How can Evidence-Based Policymaking be applied to improve policy decisions and resource allocations aimed at deterring and defeating domestic terrorism?

## **C. LITERATURE REVIEW**

The purpose of this literature review is to examine the varying perspectives on evidence-based policymaking and its application towards countering domestic terrorism. This section reviews the current literature surrounding evidence-based policymaking, as well as literature on combating terrorism and countering violent extremism. The first part of this section discusses the differing opinions on the use in social sciences of evidence-based policymaking, which is the theory that governments should develop “public policies, programs, and practices that are grounded in empirical evidence.”<sup>14</sup> The second part reviews research on the effectiveness and challenges of policies and methods in producing a measurable reduction in terrorist activity, as well as the impacts on evidence-based policymaking due to the limited data for domestic terrorism activities within the United States.

### **1. Evidence-Based Policymaking**

The following paragraphs discuss the divided field of thought on evidence-based policymaking. One school of thought promotes the rhetoric that evidence should be used across all aspects of government decision-making, whereas another school argues that qualitative evidence neither applies in value-based judgments nor can meet the high standards to be considered evidence for policymaking. The latter school of thought

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<sup>13</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*.

<sup>14</sup> *Britannica*, “evidence-based policy.”

contends that often within government, research is completed to support an existing policy, leading to “policy-based evidence.” In other words, the evidence may be contaminated by confirmation bias and influenced by political objectives, calling its efficacy into question.

Authors, like Ron Haskins and Esther Duflo, promote the use of evidence in solving social science problems, similar to its use in the field of medicine. Ron Haskins, one of the leading experts on Evidence-Based Policy and a proponent of its use, was a lead author for the Commission on Evidence-Based Policymaking Report.<sup>15</sup> His analysis, along with that of other authors, highlights its growing use by the United States and the United Kingdom to positively tackle social issues through scientific evidence. His work strongly contends that programs can only be proven effective if the results are evaluated using rigorous data analysis. He advises that its application has been primarily “to social and human services programs, but a wide variety of government programs could benefit from building and using evidence.”<sup>16</sup> Esther Duflo, a Nobel peace prize winner, strengthens this approach through her research and notes that “experiments create a mutually enriching dialogue between social science and policy design. Each experiment...successively adding to and subtracting from our ever-evolving fund of theoretical and practical knowledge of what works.”<sup>17</sup> The National Institute of Corrections has been at the forefront of evidence and evaluation for several decades and has used the scientific method in the development of lessons learned for criminal justice professionals to reduce recidivism. Authors sponsored by the organization have noted that “evidence-based policy and practice provides more assurance that professionals are using proven strategies and approaches, which will result

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<sup>15</sup> Katharine G. Abraham and Ron Haskins, *The Promise of Evidence-Based Policymaking: Report of the Commission on Evidence-Based Policymaking* (Washington, DC: Commission on Evidence-Based Policymaking, 2017), <https://bipartisanpolicy.org/download/?file=/wp-content/uploads/2019/03/Full-Report-The-Promise-of-Evidence-Based-Policymaking-Report-of-the-Comission-on-Evidence-based-Policymaking.pdf>.

<sup>16</sup> Evidence-Based Policymaking Collaborative, *Principles of Evidence-Based Policymaking* (Washington, DC: Urban Institute, 2016), 2, [https://www.urban.org/sites/default/files/publication/99739/principles\\_of\\_evidence-based\\_policymaking.pdf](https://www.urban.org/sites/default/files/publication/99739/principles_of_evidence-based_policymaking.pdf).

<sup>17</sup> Esther Duflo and Kudzai Takavarasha, “Social Science and Policy Design,” in *World Social Science Report: Knowledge Divides*, ed. Françoise Caillods (Paris: UNESCO Publishing, 2010), 332, <https://unesdoc.unesco.org/ark:/48223/pf0000211832>.

in reduced misconduct and enhanced safety for all.”<sup>18</sup> In this way, evidence has been successfully applied to some of the most challenging social problems including criminal activity and recidivism.

Authors, like Andrea Saltelli and Brian Head, argue that societal issues with multiple differing value judgments negate the effectiveness of evaluation in social sciences. Andrea Saltelli holds that the complex nature of value-based decisions results in significant controversy when applying scientific evidence and that this leads to “policy-based evidence,” in which data is selectively chosen to support a given decision or policy. She disputes the effectiveness of evidence and warns that “rather than resolving political debate, science often becomes ammunition in partisan squabbling, mobilized selectively by contending sides to bolster their positions.”<sup>19</sup> Brian Head supports this position although he softens the argument by stating that there is an opportunity to use evaluation to improve decision-making, but it is not the only factor in policymaking. He states that “the politics of decision-making inherently involves a mixing of science, value preferences, and practical judgments about the feasibility and legitimacy of policy choices.”<sup>20</sup> Enver Solomon agrees with Brian Head’s approach and offers an integrated model that is systemic.<sup>21</sup> Nick Hart and Meron Yohannes, working for the Bipartisan Policy Center, provide multiple successful examples that acknowledge that an integrated approach can reduce uncertainty and ensure policymakers are not “basing decisions on faulty beliefs or misguided theories.”<sup>22</sup> In sum, evaluation cannot be transferred directly into value-based policies but can be used as one factor in the decision-making process.

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<sup>18</sup> Elyse Clawson and Meghan Guevara, *Putting the Pieces Together: Practical Strategies for Implementing Evidence-Based Practices* (Washington, DC: National Institute of Corrections, 2011), xvi, <https://permanent.fdlp.gov/gpo20721/024394.pdf>.

<sup>19</sup> Andrea Saltelli and Mario Giampietro, “What Is Wrong with Evidence Based Policy, and How Can It Be Improved?,” *Futures*, Post-Normal Science in Practice, 91 (2017): 63, <https://doi.org/10.1016/j.futures.2016.11.012>.

<sup>20</sup> Head, “Reconsidering Evidence-Based Policy,” 89.

<sup>21</sup> Meghan Guevara, et al., *Implementing Evidence-Based Policy and Practice in Community Corrections*, 2nd ed. (Washington, DC: National Institute of Corrections, 2009), <https://nicic.gov/implementing-evidence-based-policy-and-practice-community-corrections>; Clawson and Guevara, *Putting the Pieces Together*, act 90.

<sup>22</sup> Nick Hart and Meron Yohannes, *Evidence Works: Cases Where Evidence Meaningfully Informed Policy* (Washington, DC: Bipartisan Policy Center, 2019), 9, <https://papers.ssrn.com/abstract=3766880>.

## 2. Combating Terrorism and Countering Violent Extremism

This section assesses the research conducted on methods for countering violent extremism and combating terrorism. Counterterrorism strategies often discuss the progression towards radicalization and execution of violence, but as described below, research diverges over whether effective policies and methods have demonstrated a measurable reduction in terrorist activity. The limited data for domestic terrorism activities within the United States further compound the lack of successful strategies.

The *National Strategy for Countering Domestic Terrorism* has stated an explicit objective to ensure that evidence-based policy drives implementation.<sup>23</sup> One aspect of the strategy focuses on recruitment and mobilization to violence. Although several studies conclude that the path toward terrorism cannot be clearly defined, others articulate clear and distinguishable steps. The identification of violent extremist risk factors and indicators is not agreed upon, and several studies provide conflicting evidence about recognizing radicalization and recruitment of terrorists. Without agreement on recruitment and mobilization, implementation efforts to combat domestic terrorism as a social issue will be challenging.

Fathali M. Moghaddam, a professor of psychology, is often quoted for his explanation of how individuals become radicalized. His portrayal of militant recruitment as a “staircase to terrorism” clearly describes opportunities to implement prevention measures for a population that routinely perceives discrimination and inequality.<sup>24</sup> In support of Moghaddam, Michael Jensen highlights opportunities for programs addressing violent extremism through methods that “address feelings of community victimization in ways that challenge myths and misperceptions, but also acknowledge legitimate grievances.”<sup>25</sup> In contrast to his own statement, however, Jensen also cautions that

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<sup>23</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*.

<sup>24</sup> Fathali M. Moghaddam, “The Staircase to Terrorism: A Psychological Exploration,” *American Psychologist* 60, no. 2 (2005): 161–69, <https://doi.org/10.1037/0003-066X.60.2.161>.

<sup>25</sup> Michael Jensen et al., *Final Report: Empirical Assessment of Domestic Radicalization (EADR)* (College Park, MD: National Consortium for the Study of Terrorism and Responses to Terrorism (START), 2016), 6, <https://www.ojp.gov/pdffiles1/nij/grants/250481.pdf>.

approaches designed to counter violent extremist activity among populations with perceptions of “relative deprivation may be ineffective in many cases.” Nevertheless, even though Jensen’s research “reveals that psychological, emotional, material, and group-based factors can combine in complex ways to produce many pathways to violent extremism,” it also provides keys to developing effective methods when implementing a domestic counterterrorism strategy.<sup>26</sup> Assessing the research surrounding radicalization yields consensus about specific factors that can be analyzed; no one method is universally effective in defeating every pathway to terrorism.

In contrast, research by Harsha Pandurangu at the Brennan Center for Justice contends that “studies of individuals who have committed terrorist acts show there is no definable path a person follows before engaging in terrorism.”<sup>27</sup> Supporting Panduranga’s argument, Brian Jackson at RAND Corporation, further articulates that without key markers of radicalization in a population, determining risk factors, applying methods of prevention, or even measuring the success of counterterrorism strategies prove impossible.<sup>28</sup> Michael Jensen, in a comprehensive analysis of an exhaustive database of individual radicalization factors, provides another view through a report to the Department of Justice.<sup>29</sup> The paper identifies several factors that indicate which extremists are most likely to engage in violent acts, including eight routes to violent extremism. However, he highlights that even the study’s in-depth “analysis does not account for the pathways of 15 of the 35 violent individuals in [the] sample” and that additional research is needed to explain the causes of radicalization.<sup>30</sup> These imprecise results lead to disagreement on the path toward terrorism.

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<sup>26</sup> Jensen et al., 6.

<sup>27</sup> Harsha Panduranga, *Community Investment, Not Criminalization* (New York: Brennan Center for Justice, 2021), 4.

<sup>28</sup> Brian A. Jackson et al., *Practical Terrorism Prevention: Reexamining U.S. National Approaches to Addressing the Threat of Ideologically Motivated Violence* (Santa Monica, CA: RAND Corporation, 2019), [https://www.rand.org/pubs/research\\_reports/RR2647.html](https://www.rand.org/pubs/research_reports/RR2647.html).

<sup>29</sup> Jensen et al., *Final Report: Empirical Assessment of Domestic Radicalization (EADR)*.

<sup>30</sup> Jensen et al., 6.

Given an incomplete understanding of how individuals become radicalized, effective prevention programs have not been established. A 2018 study on factors and indicators for terrorist radicalization, conducted by Allison Smith at the National Institute for Justice, highlights the growing evidence to develop prevention and intervention programs concentrated on individuals with a higher risk of radicalization.<sup>31</sup> However, Adrian Cherney conducted in-depth interviews of Australian police officers engaged in community outreach efforts to identify terrorism activity and determined that policing lacks a significant amount of scientific data about successful methods.<sup>32</sup> Moreover, the officers could not explicitly define their impact on national security or “effectiveness in countering terrorism and violent extremism.”<sup>33</sup> Although this study was small, it highlights the challenges of building evidence to support counterterrorism methods. The complicated nature of domestic terrorism increases the difficulty of creating counter-radicalization programs, particularly in the absence of large data sets traditionally required for effective evidence-based policymaking.

### **3. Conclusions**

This literature review examined the varying perspectives on Evidence-Based Policymaking and its application towards countering domestic terrorism. The review of the current literature surrounding evidence-based policymaking demonstrated varying opinions on how it should be implemented in social sciences, but the consensus is that evaluation plays a role, but should not necessarily be absolute in making decisions. The review of current literature on counterterrorism measures highlighted the lack of agreement and supporting evidence on what leads to radicalization and which measures are effective in reducing violent attacks. Most studies agree, however, despite a growing body of

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<sup>31</sup> Allison G. Smith, *Risk Factors and Indicators Associated with Radicalization to Terrorism in the United States*, NCJ 251789 (Washington, DC: National Institute of Justice, 2018), <https://www.ojp.gov/pdffiles1/nij/251789.pdf>.

<sup>32</sup> Adrian Cherney, “Police Community Engagement and Outreach in a Counterterrorism Context,” *Journal of Policing, Intelligence and Counter Terrorism* 13, no. 1 (2018): 60–79, <https://doi.org/10.1080/18335330.2018.1432880>.

<sup>33</sup> Cherney, 74.

evidence that may be useful in future counterterrorism efforts, additional research is necessary.

#### **D. RESEARCH DESIGN**

The purpose of this thesis is to investigate the application of evidence-based policymaking to the 2021 *National Strategy for Countering Domestic Terrorism* and to provide recommendations to homeland security professionals.<sup>34</sup> This thesis will first describe the use of evidence-based policymaking in the United States and its applicability to countering domestic terrorism. It will then conduct a case study analysis of domestic and foreign initiatives—other than counterterrorism—to determine commonality. The analysis of these policies will focus on the cornerstones of evidence-based policymaking which include the ability to collect data, conduct evaluations, and measure results. These commonalities will then be explored to provide recommendations to address the challenges of applying evidence to U.S. domestic counterterrorism policymaking.

The first part of this thesis will investigate the challenges of using evidence in value-based decisions and the social sciences. Derived from the field of medicine and scientific methods, the application of evidence-based policymaking to social problems involving human behavior has mixed reviews of successful implementation. Particularly difficult are policies that involve politically sensitive issues and value-based judgments. Domestic terrorism in today's United States incorporates both complex subjects. This section will be an analysis of the literature to identify areas of dispute and commonality of evaluation in the social sciences, with an emphasis on the challenges in countering terrorism.

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<sup>34</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*.

Unfortunately, there is a lack of literature that demonstrates repeatable and effective counterterrorism strategies based on evidence.<sup>35</sup> Data collection is further exacerbated by the relative rarity of domestic terrorism cases within western-based societies and a lack of common definitions. The second part of this thesis will conduct a case study analysis of domestic and foreign policy initiatives—other than counterterrorism—with respect to the foundations of evidence-based policymaking. This analysis will identify common themes of successful evidence-based programs (see Table 1) with an emphasis on identifying critical factors on data requirements, evaluative methods, and the ability to measure results. These common themes will guide recommendations on how to implement evaluation as one part of an integrated approach in the implementation of the *National Strategy for Countering Domestic Terrorism* in the United States.

Table 1 Foreign and Domestic Evidence-Based Policymaking Programs to be Analyzed

<b>Policy Based on Evidence</b>	<b>Applicability to Thesis</b>
Reducing Violence using the Cardiff Model <sup>36</sup>	A suburb of Milwaukee successfully used the Cardiff Model to identify previously unknown hotspots of crime and enabled the community and law enforcement to implement prevention measures. The collection of crime data has direct parallels to countering domestic terrorism and targeted violence.
Crime Reduction Program in the United Kingdom <sup>37</sup>	The Crime Reduction Program was conducted in the UK in 1999 but ultimately resulted in an example of <i>policy-driven evidence</i> . The lessons learned when applying resources to politically charged issues can be correlated to efforts on combating targeted violence and domestic terrorism.

<sup>35</sup> Lum and Kennedy, *Evidence-Based Counterterrorism Policy*, 4.

<sup>36</sup> Jonathan Shepherd, “What the Cardiff Model Can Teach Us about Evidence in Policymaking,” *apolitical*, November 27, 2019, <https://apolitical.co/solution-articles/en/what-the-cardiff-model-can-teach-us-about-violence-prevention>.

<sup>37</sup> Maguire, “The Crime Reduction Programme in England and Wales.”



Policy Based on Evidence	Applicability to Thesis
Countering Violent Extremism in Los Angeles <sup>38</sup>	The city of Los Angeles conducted a pilot program for countering violent extremism in 2015. Several evaluations of the program provided recommendations that can be used in evidence-based efforts targeted towards reducing domestic terrorism.

## E. OVERVIEW OF CHAPTERS

Chapter II provides a background discussion of evidence-based policymaking including a definition of how it is applied in this thesis, its history in the United States, and provides guiding principles and key steps for developing robust evaluation procedures. Chapter II finishes with a discussion of the challenges of implementation in social science-based issues. Chapter III provides an overview of the United States strategy for countering domestic terrorism and the requirements to use evidence-based policymaking in programmatic efforts. Chapter IV conducts a case study analysis of three evidence-based policy initiatives that have lessons learned applicable to countering domestic terrorism in the United States. The three initiatives include the application of the Cardiff Model in the United States; the United Kingdom’s Crime Reduction Program; and the Los Angeles Framework for Countering Violent Extremism. Chapter V provides a conclusion that compares the similarities and differences between the three case studies against OMB’s four principles of evaluation-based programs. Chapter V also provides recommendations based on the lessons learned in the case studies for improving evidence-based policymaking when implementing the United States strategy for countering domestic terrorism strategy.

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<sup>38</sup> Stevan Weine et al., *Leveraging a Targeted Violence Prevention Program to Prevent Violent Extremism: A Formative Evaluation in Los Angeles* (Washington, DC: Department of Homeland Security, 2016).

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## II. BACKGROUND DISCUSSION ON EVIDENCE-BASED POLICYMAKING

### A. WHAT IS EVIDENCE-BASED POLICYMAKING?

For the purposes of this thesis, evidence-based policymaking will be defined as the theory that states that governments should develop “public policies, programs, and practices that are grounded in empirical evidence.”<sup>39</sup> As described by Philip Davies, it is a technique that “helps people make well-informed decisions about policies, programs and projects by putting the best available evidence from research at the heart of policy development and implementation.”<sup>40</sup> Its roots are based on evidence-based medicine, with emphasis on running experiments or interventions to determine what improves an individual’s health outcomes. As with evidence-based medicine, the theory behind addressing social issues is the methodological application of research through interventions with the intent to produce evidence that demonstrates results towards a specific problem. If the data or evidence provides measurable successful results, it can then be scaled to other population sets through additional interventions and evaluation to determine if similar results occur.

The intent of evidence-based policymaking is to improve decisions and policies that impact human lives with an effort to remove any inherent bias that may occur in political or value-based decisions. However, not all evidence is created equally. There is a range of reliability on the amount and type of data available when coupled with the evaluation methodology and measuring the results. In evidence-based decision-making, it is common to assign levels of reliability to the information supporting the decision to ensure the quality of the input. In the medical field, such as in vaccine development, the gold standard in using evidence is accomplished through the execution of randomized control trials, or interventions. One reason that randomized control trials, specifically double-blind studies, are so effective in research is that this method can effectively remove

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<sup>39</sup> *Britannica*, “evidence-based policy.”

<sup>40</sup> Davies, “Is Evidence-Based Government Possible?,” 3.

most types of bias. Bias can be incorporated into research in a variety of ways including confirmation bias, representative bias, availability bias, and many more. If proper evaluation methods are not conducted and/or bias is not accounted for, researchers can inadvertently include data that can potentially lead to discriminatory policy decisions. Figure 1 demonstrates the impact of different evaluation methods on quality of evidence and bias reduction. Typically, higher methods in the pyramid exhibit increased quality while also reducing the risk of bias and/or discrimination. Even though Figure 1 is designed around experimental methods used in the medical sciences, and not all of these methods may effectively translate into countering domestic terrorism, it does provide a model to consider how bias may impact evidence-based policymaking.



Figure 1 Levels of Evidence Pyramid<sup>41</sup>

<sup>41</sup> Elizabeth Yetley et al., “Options for Basing Dietary Reference Intakes (DRIs) on Chronic Disease Endpoints: Report from a Joint US-/Canadian-Sponsored Working Group,” *American Journal of Clinical Nutrition* 105 (2016): S11, <https://doi.org/10.3945/ajcn.116.139097>.

Starting at the bottom of the pyramid, the levels in the pyramid of evidence in Figure 1 are defined as:

- Editorials and Expert Opinion are good resources for understanding a topic, learning definitions, and understanding parameters. However, reduction in bias requires statistically significant data from research higher in the pyramid.
- Mechanistic studies are experiments where a healthy system is perturbed to expand knowledge about the design and how it reacts to differing data. In the social sciences, this can be used to find improvements in systems.<sup>42</sup>
- Case Series/Case Reports document the outcome of a specific or hypothetical case. Case studies are generally not used in evidenced-based policymaking as they are typically anecdotal evidence without statistical significance.
- Cross-sectional studies are observational and are known as descriptive research, not causal or relational, meaning that they cannot be used to determine the cause of something, such as a disease. Researchers record the information that is present in a population, but they do not manipulate variables.<sup>43</sup> This is the first step in evidence-based policymaking to collect data about a system.
- In healthcare, “Case-Control Studies look at a group of individuals with a specific condition and compare them to a group of people without the same condition.”<sup>44</sup> Case-Control Studies can be used in the social sciences to build statistical conclusions based on similarities and suggest relationships between the past and present.

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<sup>42</sup> Raymond MacAllister and Kristin Veighey, “Governing Mechanistic Studies to Understand Human Biology,” *Research Ethics* 8, no. 4 (2012): 212–15, <https://doi.org/10.1177/1747016112464840>.

<sup>43</sup> Kendra Cherry, “How Does the Cross-Sectional Research Method Work?,” *Verywell Mind*, October 10, 2019, <https://www.verywellmind.com/what-is-a-cross-sectional-study-2794978>.

<sup>44</sup> Dubravka Juraga, “Nursing: Evidence Pyramid,” *Triton College Library*, accessed October 7, 2021, <https://library.triton.edu/c.php?g=433673&p=3720267>.

- Cohort Studies are observational studies that compare a cohort already undergoing a process or with specific, unique exposure to a separate cohort that is not utilizing the same process or exposure.<sup>45</sup> In the social sciences, this approach can evaluate different results or determine biases between different cohorts.
- Randomized Controlled Trials answer questions about the efficacy of different types of methods. They are designed with two cohort groups, a test group, and a control group, with subjects assigned randomly to each group. This allows the study to test a specific process against either no-process or a different method.<sup>46</sup>
- Meta-Analysis and Systematic Reviews are the gold standards. Systematic Reviews summarize the results of multiple randomized control trials on a specific issue. They assess the methodology, sample size, and quality of the studies, using the highest quality data available to answer specific questions and develop recommendations. Meta-Analysis takes this process one step further, reviewing multiple Systematic Reviews to consider all of the data and produce the highest statistical analysis.<sup>47</sup>

Appropriately understanding the reliability, quality, and limitations of research methods and the potential impacts of bias is important when conducting evaluation to address policy issues. Some experimental methods used in the medical sciences might not be effectively translated into the social sciences due to a variety of reasons including low-quality data, small sample sizes, and human research protections, among others. Therefore, evidence-based policymaking researchers have the option to use theory-based methods to improve decisions while minimizing bias. The discussion of evaluation methodologies is beyond the scope of this thesis, but the UK's Magenta Book provides an exceptional resource to determine what type of experimental, quasi-experimental, and theory-based

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<sup>45</sup> Juraga.

<sup>46</sup> Juraga.

<sup>47</sup> Juraga.

methods are best suited for different situations.<sup>48</sup> Additionally, the Office of Management and Budget provides guidelines for conducting evaluations and reducing bias in policy decisions through Circular A-11.<sup>49</sup>

It is important to note that evidence is not the only element influencing policymaking in the social sciences. Several factors impact the decision process, including research methods, institutional inertia, and the time available. Additionally, there are significant differences between academics and decision-makers that “use different languages and have different priorities, agendas, timescales and reward systems” which can result in a poor correlation between expectations and results.<sup>50</sup> Moreover, “policymaking is neither objective nor neutral: it is an inherently political process.”<sup>51</sup> For this reason, evidence-based policymaking is often called evidence-influenced policymaking in the social sciences and value-based decisions.

## **B. HISTORY OF EVIDENCE-BASED POLICYMAKING**

Evidence-based policymaking began its existence in the 1960s in social welfare programs but did not get started as a movement across other social sciences until the 1990s.<sup>52</sup> The United Kingdom, in particular, has been at the forefront of incorporating the paradigm of using data to build evidence in the medical field for interventions against disease by converting the principles of evidence-based medicine into evidence-based policy.<sup>53</sup> Specifically, the Blair government incorporated evidence-based policymaking in the late 1990s by encouraging rationalized decision-making through the slogan “what

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<sup>48</sup> Her Majesty’s Treasury, *Prudential Standards in the Financial Services Bill*, 47.

<sup>49</sup> Shalanda D. Young, *Circular No. A-11 Preparation, Submission, and Execution of the Budget* (Washington, DC: Office of Management and Budget, 2021), 636, <https://www.whitehouse.gov/wp-content/uploads/2018/06/a11.pdf>.

<sup>50</sup> Sutcliffe and Court, *Toolkit for Progressive Policymakers*, 3.

<sup>51</sup> Sutcliffe and Court, 3.

<sup>52</sup> Ray Pawson and Nick Tilley, *Realistic Evaluation* (Thousand Oaks: CA: Sage, 1997), 2.

<sup>53</sup> *Britannica*, “evidence-based policy.”

matters is what works.”<sup>54</sup> The UK Treasury Department promoted this new approach across the government “with resources tied to the achievement of performance targets.”<sup>55</sup> The strong support of evidence-based policy by the government of the United Kingdom created an upswell of activity in evaluation and research which led to increased use by other nations.

The United States incorporated Evidence-Based Policymaking in the field of welfare reform in the 1980s and Congressionally mandated evaluations of education programs at the turn of the twenty-first century, but the last five years have shown a renewed commitment to all fields of policymaking through bipartisan action.<sup>56</sup> In 2016, Congress established a Commission to investigate how the government can best incorporate evidence in future decisions. The results of this Commission provided multiple recommendations to improve the effectiveness of programs through the use of evaluation, primarily through improving access to data and the assignment of government officials charged with the primary responsibility of increasing the use of evaluation in the decision-making process.<sup>57</sup> The Commission’s Report led to Congress’s bipartisan passing of the Foundations for Evidence-Based Policymaking Act of 2018 (or simply just called the Evidence Act).<sup>58</sup> The Evidence Act recognized that there was not enough data or evaluation being used in the government’s decisions and the effectiveness of policies and programs. The Office of Management and Budget states that “the Evidence Act mandates a systematic rethinking of government data management to better facilitate access for evidence-building activities and public consumption [and a] shift away from low-value activities toward actions that support decision-makers.”<sup>59</sup>

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<sup>54</sup> Ian Sanderson, “Making Sense of ‘What Works’: Evidence Based Policy Making as Instrumental Rationality?,” *Public Policy and Administration* 17, no. 3 (2002): 62, <https://doi.org/10.1177/095207670201700305>.

<sup>55</sup> Sanderson, 63.

<sup>56</sup> Jon Baron, “A Brief History of Evidence-Based Policy,” *ANNALS of the American Academy of Political and Social Science* 678, no. 1 (2018): 40–50, <https://doi.org/10.1177/0002716218763128>.

<sup>57</sup> Abraham and Haskins, *The Promise of Evidence-Based Policymaking*.

<sup>58</sup> Foundations for Evidence-Based Policymaking Act of 2018.

<sup>59</sup> Vought, *Phase 1 Implementation of the Foundations*.



The Evidence Act states that evaluation is “an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency.”<sup>60</sup> In supplement to the Evidence Act, the Office of Management and Budget (OMB) released a Memorandum on July 10, 2019, outlining Phase I of implementing the Evidence Act and describing the fundamental components of evidence (Figure 2).<sup>61</sup> The 2019 memo was the beginning of a four-phased approach to provide guidance to appropriately implement the Evidence Act.



Figure 2 OMB Phases to Prepare Federal Agencies to Support the Evidence Act

The first phase in the 2019 OMB memo required that certain federal agencies assign a Chief Data Officer, Evaluation Officer, and Statistical Official to lead each agency through increased use of data governance and the development of a Learning Agenda. The Office of Management and Budget provides guidance noting that “the Learning Agendas are, in many ways, the driving force for several of the activities required by and resulting from the Evidence Act. The creation of Learning Agendas requires agencies to identify and

<sup>60</sup> Foundations for Evidence-Based Policymaking Act of 2018.

<sup>61</sup> Vought, *Phase 1 Implementation of the Foundations*.

set priorities for evidence building, in consultation with various stakeholders.”<sup>62</sup> The memorandum also requires that agencies develop a Performance Plan, Evaluation Plans, and Capacity Assessments (completed annually and submitted to OMB) to determine what is required to successfully address the priority questions laid out in the Learning Agenda. The Evaluation Plans discretely describe what questions are being answered by the specific studies being undertaken, including the information needed and the methodology. OMB’s guidance was instrumental in setting up the government for future implementation of evaluation and data in decision-making.

OMB followed up with another memorandum in 2020 which provided “program evaluation standards to guide agencies in developing and implementing evaluation activities, evaluation policies, and in hiring and retaining qualified staff.”<sup>63</sup> The memo also highlights the importance of conducting evaluations that follow the principles of “relevance and utility, rigor, independence and objectivity, transparency, and ethics.”<sup>64</sup> This guidance was designed not to be overly prescriptive and allows for agency flexibility but also provides an “extensive list of source documents [that] identify widely accepted standards for evaluation” for agencies that have not yet matured their evaluation practices.<sup>65</sup>

OMB’s most recent guidance followed President Biden’s 2021 memorandum to federal agencies, which reinforced his direction and intent “to make evidence-based decisions guided by the best available science and data.”<sup>66</sup> In alignment with previous discussions, the President highlighted that appropriate evaluation methods were critical in improving decision-making and include “pilot projects, randomized controlled trials,

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<sup>62</sup> Vought, 2.

<sup>63</sup> Russell T. Vought, *Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices*, M-20–12 (Washington, DC: Office of Management and Budget, 2020), 1, <https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-12.pdf>.

<sup>64</sup> Vought, 1.

<sup>65</sup> Vought, 2.

<sup>66</sup> Joseph R. Biden, Jr., “Memorandum on Restoring Trust in Government through Scientific Integrity and Evidence-Based Policymaking,” The White House Briefing Room, January 27, 2021, <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policymaking/>.

quantitative survey research, and statistical analysis, qualitative research, ethnography” among other methods in the data sciences.<sup>67</sup> OMB’s guidance stressed the importance that agencies shall dedicate funding to evaluation processes as well as work with community partners to improve the quality and implementation of evidence. Moreover, the office expanded the approaches laid out by the Presidential memorandum to include “using outcome-focused grant designs like tiered evidence, pay-for-performance approaches, waiver demonstrations that suspend certain requirements within programs and then undergo rigorous evaluation to test those changes, and opportunities to embed and test alternative strategies to achieve policy and program outcomes.”<sup>68</sup> In alignment with the direction from OMB, the Department of Homeland Security released Directives 069–03 and 069–03-001 stating that the “DHS is committed to ensuring a strong culture of evaluation, evidence building, and organizational learning.”<sup>69</sup> The directive also guided the Department on how to implement the Evidence Act, but in reality, fundamentally just restated the OMB guidance on the steps needed to conduct an effective evaluation as well as its dissemination criteria.

### C. CATEGORIES AND STEPS OF EVIDENCE-BASED POLICYMAKING

The Bipartisan Policy Center notes that “policymaking can be a complex, nonlinear process. How policies are enacted may depend on the specific issue, stakeholders, contexts, constraints, considerations, and politics.”<sup>70</sup> The Office of Management and Budget provides the diagram shown in Figure 3. Per OMB guidance, this “depicts and describes four interdependent components of evidence: foundational fact-finding, policy analysis, program evaluation, and performance measurement. Each of these components informs and directs the others, and many evidence-building activities may be hard to categorize

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<sup>67</sup> Biden, Jr.

<sup>68</sup> Shalanda D. Young, *Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans*, M-21–27 (Washington, DC: Office of Management and Budget, 2021), 11, <https://www.whitehouse.gov/wp-content/uploads/2021/06/M-21-27.pdf>.

<sup>69</sup> Alles, *Program, Policy, and Organizational Evaluations*, 1.

<sup>70</sup> Bipartisan Policy Center, “Evidence-Based Policymaking Primer” (Washington, DC: Bipartisan Policy Center, March 2019), 3, <https://bipartisanpolicy.org/download/?file=/wp-content/uploads/2019/03/Evidence-Based-Policymaking-Primer.pdf>.

because they organically include more than one component.”<sup>71</sup> OMB recommended that agencies consider these types of evidence in their activities but did not explicitly define the four categories of evidence-based policy in Figure 3. While OMB helped clarify the process in 2021, there is not a single definitive source for the process of evidence-based policymaking.<sup>72</sup>

Different organizations have promoted and recommended varying approaches to incorporate evaluation in the use of evidence-based decision-making. The Pew-MacArthur Foundation’s Results First Initiative released the Evidence-Based Policymaking Guide for Effective Government which has five different steps, including Program Assessment, Budget Development, Implementation Oversight, Outcome Monitoring, and Targeted Evaluation.<sup>73</sup> The Bipartisan Policy Center has three focus areas, and the Overseas Development Institute has six steps.<sup>74</sup> Since the Office of Management and Budget has established the four steps listed in Figure 3 for federal government implementation, the following is the author’s effort to assist in defining the key components needed to implement evaluation in countering domestic terrorism. The key components under each of the four steps are derived from various approaches to evaluation including the documents listed above.

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<sup>71</sup> Vought, *Phase 1 Implementation of the Foundations*, 13.

<sup>72</sup> Young, *Evidence-Based Policymaking*.

<sup>73</sup> Susan K. Urahn and Michael Caudell-Feagan, *Evidence-Based Policymaking: A Guide for Effective Government* (Washington, DC: Pew Charitable Trusts, 2014), <https://www.pewtrusts.org/en/research-and-analysis/reports/2014/11/evidence-based-policymaking-a-guide-for-effective-government>.

<sup>74</sup> Bipartisan Policy Center, “Evidence-Based Policymaking Primer”; Sutcliffe and Court, *Toolkit for Progressive Policymakers*.

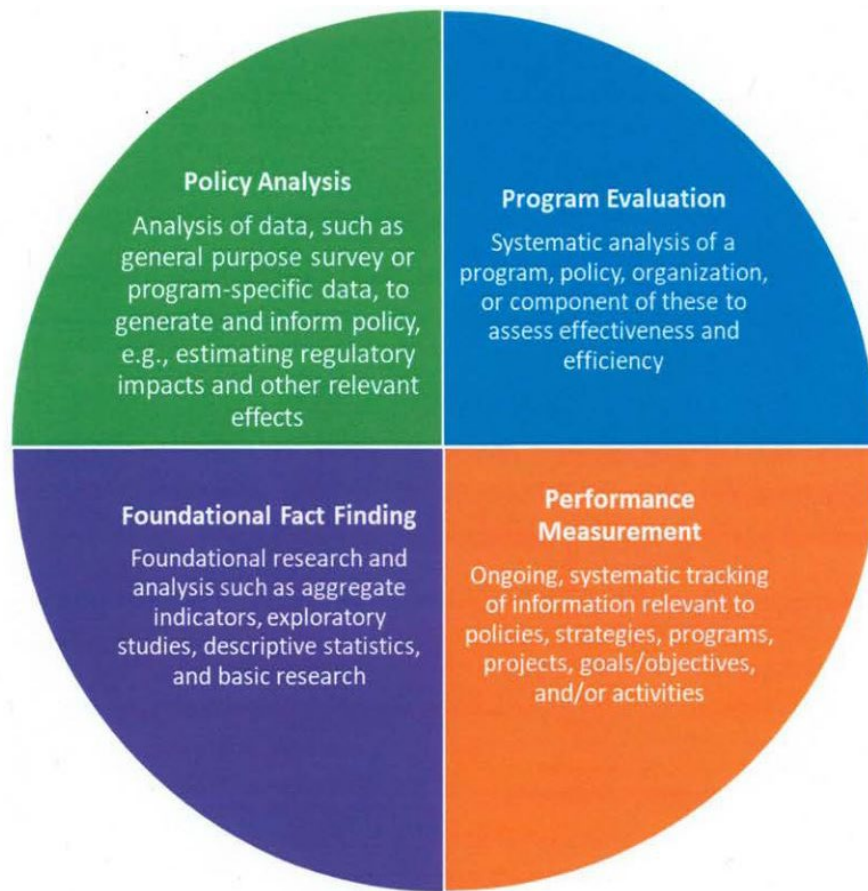


Figure 3 OMB Guidance on the Components of Evidence<sup>75</sup>

**Foundational Fact-Finding:** Foundational fact-finding is typically considered the most basic of research to highlight data trends or provide simple studies. Online resources describe this step as a method to “investigate an issue, occurrence or phenomenon that is not clearly defined.”<sup>76</sup> OMB describes this step as a way to “understand relationships between program activities and participant outcomes, measure relationships between policies and particular outcomes, describe program participants or components, and identify trends or patterns in data.”<sup>77</sup> Health and Human Services identifies this type of

<sup>75</sup> Vought, *Phase 1 Implementation of the Foundations*, 13.

<sup>76</sup> “How to Conduct Exploratory Research for Your Early Research Needs,” Pollfish Resources, April 26, 2021, <https://resources.pollfish.com/survey-guides/how-to-conduct-exploratory-research/>.

<sup>77</sup> Young, *Circular A-11*.

research as providing “descriptions and documentation of interventions, services, programs, or policies currently being implemented in the field” as well as steps to “identify logical connections that may form the basis for future interventions, programs, or strategies.”<sup>78</sup> Importantly, OMB stated that this part of the process can be “through quantitative and/or qualitative data...without inferring causality or measuring effectiveness.”<sup>79</sup> As a basic fact-finding method, this part of the process remains lower in the pyramid of evidence (see Figure 1) and may contain higher levels of bias, but provides the groundwork for beginning to understand how programs are performing. Key components in properly performing this step include:

- Define the Problem—The Evidence Act required that the federal government develop learning agendas that “address the key questions an agency wants to answer.”<sup>80</sup> It is a key first step in the process as it “promotes deliberate planning of evidence-building activities.”<sup>81</sup>
- Standardize Data—The backbone of evidence is the “systematic collection of high-quality data and analysis of those data with rigorous research methods, which creates evidence on which decisions can be based.”<sup>82</sup> To be effective, data needs to be standardized or normalized to evaluate its performance and compare it against other programs.
- Inventory Programs—The Pew-MacArthur foundation recommends that governments “develop an inventory of funded programs.”<sup>83</sup> This assists the

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<sup>78</sup> Office of Planning, Research & Evaluation, *The Administration for Children & Families Common Framework for Research and Evaluation*, OPRE Report 2016-14 (Washington, DC: Department of Health and Human Services, 2016), 3, [https://www.acf.hhs.gov/sites/default/files/documents/opre/acf\\_common\\_framework\\_for\\_research\\_and\\_evaluation\\_v02\\_a.pdf](https://www.acf.hhs.gov/sites/default/files/documents/opre/acf_common_framework_for_research_and_evaluation_v02_a.pdf).

<sup>79</sup> Young, *Evidence-Based Policymaking*, 18.

<sup>80</sup> Vought, *Phase 1 Implementation of the Foundations*, 14.

<sup>81</sup> Vought, 14.

<sup>82</sup> Bipartisan Policy Center, “Evidence-Based Policymaking Primer.”

<sup>83</sup> Urahn and Caudell-Feagan, *Evidence-Based Policymaking*, 20.

policymakers in understanding what programs have already been implemented on the topic.

Policy Analysis: OMB describes this step as determining “what approach best addresses the problem given available evidence.”<sup>84</sup> This is the least defined step in the process, but the CDC helps inform this step by stating that “policy analysis is the process of identifying potential policy options that could address your problem and then comparing those options to choose the most effective, efficient, and feasible one.”<sup>85</sup> A review of Pew-MacArthur’s Evidence-Based Policymaking Guide for Effective Government highlights that for this to be effective governments should “assess the available evidence of effectiveness and return on investment for each [program].”<sup>86</sup> This is an important step because it begins the process of comparing different interventions or policy decisions against each other. Key components in properly performing this step include:

- Classify Programs—Not all programs are created equal. Some may already be evidence-based with thorough evaluation demonstrating results, while others may have no evaluation or associated data. Pew-MacArthur recommends that agencies “categorize programs by their evidence of effectiveness” to help determine which programs to implement and which ones need more evaluative analysis.<sup>87</sup>
- Conduct Comparisons—Comparing programs against each other and against other governments’ initiatives, sometimes called benchmarking, is useful in measuring progress. A good example of this can be found in the U.S. Department of Housing and Urban Development’s Healthy Communities Assessment Tool or the National Core Indicators project which provides a “standard set of performance and

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<sup>84</sup> Young, *Evidence-Based Policymaking*, 5.

<sup>85</sup> “Policy Analysis,” Centers for Disease Control and Prevention, March 3, 2021, <https://www.cdc.gov/policy/polaris/policyprocess/policyanalysis/index.html>.

<sup>86</sup> Urahn and Caudell-Feagan, *Evidence-Based Policymaking*, 4.

<sup>87</sup> Urahn and Caudell-Feagan, 20.

outcome indicators that can be used to track state service system performance over time, to compare results across states and to establish benchmarks.”<sup>88</sup>

Performance Measurement: OMB describes this step as “used to measure progress toward goals, and also used to find ways to improve progress, reduce risks, or improve cost-effectiveness.”<sup>89</sup> Importantly, performance measurement can assess the outputs or outcomes provided by a program or a process, but “it typically cannot discern causal attribution,” which does not occur until the program evaluation step.<sup>90</sup> Pew-MacArthur’s guide captures this step under its outcome monitoring section which describes that governments should “routinely measure and report outcome data to determine whether programs are achieving desired results.”<sup>91</sup> Key components in properly performing this step include:

- Develop Meaningful Metrics—outputs that help inform the results of the program towards the desired objective. Governments should avoid reporting on metrics, such as the number of people served or products delivered, which are of limited use in determining results.
- Capture Relevant Information—“Information is relevant if it is connected directly to the purposes of the evaluation.”<sup>92</sup> Extraneous information may cause policymakers to focus on topics that do not accomplish the desired goals of the program.

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<sup>88</sup> “HCI Domains and Indicators,” Healthy Communities Assessment Tool (HCAT), accessed April 17, 2022, <https://archives.huduser.gov/healthycommunities/indicators.html>; “Indicators,” National Core Indicators, accessed April 17, 2022, <https://www.nationalcoreindicators.org/about/indicators/>.

<sup>89</sup> Young, *Evidence-Based Policymaking*, 25.

<sup>90</sup> Young, 25.

<sup>91</sup> Urahn and Caudell-Feagan, *Evidence-Based Policymaking*, 14.

<sup>92</sup> Donald B. Yarbrough, ed., *The Program Evaluation Standards: A Guide for Evaluators and Evaluation Users*, 3rd ed. (Thousand Oaks, CA: SAGE Publications, 2011), 45.



- Establish the Evaluation Design—Prior to initiating a program, the methodology needs to be specified and reduce the risk of bias “associated with the adoption of inappropriate methods or selective reporting of findings.”<sup>93</sup>

Program Evaluation: This step is an essential component when conducting effective policymaking based on evidence. The Evidence Act describes this as “an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency.”<sup>94</sup> OMB provided specific guidance on this step and lists the five evaluation standards as Relevance and Utility, Rigor, Independence and Objectivity, Transparency, and Ethics. However, the agency also notes that “while these standards and practices will assist in establishing a more formal structure for Federal evaluation, they should not be used to introduce administrative rigidity and complexity, which may detract from innovation in developing and maintaining agencies’ evaluation capacity.”<sup>95</sup> Program evaluation is the step where agencies rigorously assess the outcomes or impacts of programs including some of the methods that reduce bias as listed higher in the evaluation pyramid in Figure 1. Key components in properly performing this step include:

- Assess Evidence—Evaluations must be credible and objective. “Evidence has varying degrees of credibility, and the strongest evidence generally comes from a portfolio of high- quality, credible sources rather than a single source.”<sup>96</sup> Priority for future funding should be given to programs that have demonstrated the successful use of evidence across several initiatives without bias.
- Report Results—Analysts and researchers should prioritize reporting all results of programs in alignment with OMB’s evaluation standards. This will help promote

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<sup>93</sup> Young, *Evidence-Based Policymaking*, 5.

<sup>94</sup> Foundations for Evidence-Based Policymaking Act of 2018.

<sup>95</sup> Young, *Evidence-Based Policymaking*, 7.

<sup>96</sup> Young, *Circular A-11*, Section 200, 18.

continued use of evaluation and strengthen accountability on what works and what gaps need to be addressed.

- Centralize Results—The evaluation results of the program and the data associated with it should be easily located and retrieved by developing a standard location for the future such as in a “central repository or clearinghouse.”<sup>97</sup>

#### **D. CHALLENGES WITH APPLYING EVIDENCE-BASED POLICYMAKING TO SOCIAL SCIENCES AND VALUE-BASED DECISIONS**

As discussed, evidence-based policymaking began in the medical sciences. Using the same approach in value-based social sciences creates different challenges. In medicine, an intervention can typically be easily measured based on whether the patient gets better or not. Despite this simplistic view, research in evidence-based medicine follows approved methodologies to avoid bias and inaccurate data. This approach often results in an agreed-upon peer-based review that the intervention resulted in the curing of the disease or amelioration of the symptoms. In the social sciences, the metrics that demonstrate improvements or effectiveness may be value-dependent. In value-based decisions, the relevant values of policymakers can significantly influence the decision process. In politically charged issues, this can lead to “policy-based evidence” where statistics are cherry-picked to support the policymaker’s preferred policy. For example, gun violence is a problem in the United States but quickly becomes a politically charged issue. Even though the bipartisan goal is to reduce violence due to guns, individuals that value the right to possess weapons may demonstrate cases where guns were helpful in personal protection while others may provide examples and statistics demonstrating that gun ownership leads to increased violence. Value-based decisions result in policy-based evidence that further highlights that the use of evidence is critical to help inform policymakers to make decisions that meet the desired outcomes, rather than rely on intuition or heuristics.

Some researchers, like Andrea Saltelli and Brian Head, have argued that multiple differing value judgments on societal issues negate the effectiveness of evaluation in the

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<sup>97</sup> Urahn and Caudell-Feagan, *Evidence-Based Policymaking*, 22.

social sciences.<sup>98</sup> “Values are subsets of beliefs. Some studies acknowledge that values are abstract, internal, and subjective concepts” which can be influenced and driven by multiple variables, including education, religion, environment, and cultural ideology.<sup>99</sup> Additionally, evaluation criteria in evidence-based policymaking may require the use of weighting and priority setting. Jonathan Haidt described the process by which people make decisions as based on the relative prioritization of the moral characteristics of care, fairness, liberty, loyalty, authority, and purity.<sup>100</sup> Conflicts arise when policymakers do not agree on the prioritization of values. The Model for Value-based Policy-making in Health Systems published in the *International Journal of Preventive Medicine* notes that “sometimes values are in conflict with each other and we will be forced to choose one value at the expense of losing the other.”<sup>101</sup> Another challenge in the social sciences is the lack of available data. The medical field has clear guidelines on calculating and reporting sample sizes to assess the quality of randomized controlled trial reports.<sup>102</sup> In commonly experienced health issues (i.e., cancer, heart disease, etc.), there is often a large sample size that can reduce bias and improve results in an evaluation, but in social sciences (like domestic terrorism) there are often relatively few cases. As stated by the Office of Management and Budget, “federal agencies often lack the data and evidence necessary to make critical decisions about program operations, policy, and regulations.”<sup>103</sup>

The lack of data leads to the inability to conduct statistically significant interventions, inherent biases, or deficient control methods. Even in evidence-based medicine, policymaking can be challenging when there is not enough data, or the data

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<sup>98</sup> Saltelli and Giampietro, “What Is Wrong with Evidence Based Policy”; Head, “Reconsidering Evidence-Based Policy.”

<sup>99</sup> Lida Shams et al., “Model for Value-Based Policy-Making in Health Systems,” *International Journal of Preventive Medicine* 12 (2021): 3, [https://doi.org/10.4103/ijpvm.IJPVM\\_325\\_19](https://doi.org/10.4103/ijpvm.IJPVM_325_19).

<sup>100</sup> Jonathan Haidt, *The Righteous Mind: Why Good People Are Divided by Politics and Religion* (New York: Vintage Books, 2013), <http://jeffco.axis360.baker-taylor.com/Title?itemid=0009839976>.

<sup>101</sup> Shams et al., “Model for Value-Based Policy-Making in Health Systems,” 4.

<sup>102</sup> Ameneh Ebrahim Valojerdi, Kiarash Tanha, and Leila Janani, “Important Considerations in Calculating and Reporting of Sample Size in Randomized Controlled Trials,” *Medical Journal of the Islamic Republic of Iran* 31 (December 25, 2017): 1–4, <https://doi.org/10.14196/mjiri.31.127>.

<sup>103</sup> Vought, *Phase 1 Implementation of the Foundations*, 1.

continues to evolve. For example, during the COVID-19 pandemic, policymakers in Sweden made a value-based decision that the community would follow voluntary recommendations, while most other countries conducted mandatory measures. Sweden has been clear in that “independent expert government agencies make recommendations, [and] the government makes decisions.”<sup>104</sup> The government of Sweden made a value-based decision that “maintaining the health and stability of the economy [was] the nation’s top priority.”<sup>105</sup> Eventually, after more data became available and the earlier policy decisions did not have the anticipated impacts, Sweden instituted mandatory restrictions. Policy decisions based on evidence will continue to be challenging when data is unavailable or more time is needed to gather appropriate data.

In politically charged issues, the complex nature of value-based decisions results in significant controversy when applying scientific evidence. Andrea Saltelli and Mario Giampietro note that “rather than resolving political debate, science often becomes ammunition in partisan squabbling, mobilized selectively by contending sides to bolster their positions.”<sup>106</sup> In the *Righteous Mind*, Jonathan Haidt points out that “people bind themselves into political teams that share moral narratives. Once they accept a particular narrative, they become blind to alternative moral worlds.”<sup>107</sup> This can lead to “policy-based evidence” when “governments tend to use and promote those research findings which fit policies already decided upon (in extreme cases ‘burying’ evidence which seriously challenges such policies), so that the role of research is more often one of legitimizing policy rather than ‘driving’ it.”<sup>108</sup> Researchers and policymakers must continue to work together closely to ensure data and evaluation are not contaminated by

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<sup>104</sup> “Here’s a Brief Summary of How Sweden Has Handled the Covid-19 Pandemic,” Sweden and Corona—In Brief, April 1, 2022, <https://sweden.se/life/society/sweden-and-corona-in-brief>.

<sup>105</sup> Vera Jonsdottir, “Sweden’s Unconventional Approach to Covid-19: What Went Wrong,” *Chicago Policy Review*, December 14, 2021, <https://chicagopolicyreview.org/2021/12/14/swedens-unconventional-approach-to-covid-19-what-went-wrong/>.

<sup>106</sup> Saltelli and Giampietro, “What Is Wrong with Evidence Based Policy,” 63.

<sup>107</sup> Haidt, *The Righteous Mind*, 2.

<sup>108</sup> Maguire, “The Crime Reduction Programme in England and Wales,” 227.

confirmation bias or influenced by value-laden political objectives that call its efficacy into question.

Despite these challenges, many authors promote the use of evidence in solving social science problems, similar to its use in the medical field. The Commission on Evidence-Based Policymaking Report strongly contends that social science programs can be proven effective if the results are evaluated using rigorous data analysis.<sup>109</sup> Additionally, the Evidence-Based Policymaking Collaborative states that “a wide variety of government programs could benefit from building and using evidence.”<sup>110</sup> Many practitioners recognize that evidence is not the only factor in policymaking. Brian Head notes that “the politics of decision-making inherently involves a mixing of science, value preferences, and practical judgments about the legitimacy of policy choices.”<sup>111</sup> This approach is often called “evidence-informed” policymaking and academics have developed integrated models, including the Bipartisan Policy Center, which has provided multiple successful examples that acknowledge that an integrated approach can reduce uncertainty.<sup>112</sup> In validation, Nick Hart and Meron Yohannes also highlight successful cases where policymakers were not “basing decisions on faulty beliefs or misguided theories.”<sup>113</sup> The National Institute of Corrections has been at the forefront of evidence-based policymaking for several decades and has used the scientific method in the development of lessons learned for criminal justice professionals to reduce recidivism. Authors sponsored by the organization have noted that “evidence-based policy and practice provides more assurance that professionals are using proven strategies and approaches, which will result in reduced misconduct and enhanced safety for all.”<sup>114</sup> In this way,

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<sup>109</sup> Abraham and Haskins, *The Promise of Evidence-Based Policymaking*.

<sup>110</sup> Evidence-Based Policymaking Collaborative, *Principles of Evidence-Based Policymaking*, 2.

<sup>111</sup> Head, “Reconsidering Evidence-Based Policy,” 89.

<sup>112</sup> Guevara, et al., *Implementing Evidence-Based Policy*; Clawson and Guevara, *Putting the Pieces Together*, 90.

<sup>113</sup> Hart and Yohannes, *Evidence Works*, 9.

<sup>114</sup> Clawson and Guevara, *Putting the Pieces Together*, xvi.

evidence has been successfully applied to some of the most challenging social problems including criminal activity and recidivism.

## **E. CHAPTER SUMMARY**

This chapter provided a definition of evidence-based policymaking, a historical summary of its foundations and implementation, a model for implementation in the United States, and a discussion of the challenges associated with applying evidence to social sciences. Dvora Yanow defines evidence-based policymaking as the theory that states that governments should develop “public policies, programs, and practices that are grounded in empirical evidence.”<sup>115</sup> Philip Davies discusses that governments can make data-driven decisions “by putting the best available evidence from research at the heart of policy development and implementation.”<sup>116</sup> The medical field has been at the forefront of using data to build evidence for interventions against disease. While evidence-based policymaking began its existence in the 1960s in social welfare programs, it did not get started as a movement across other social sciences until the 1990s.<sup>117</sup>

Decisions based on evaluation must use high-quality data that mitigates most types of bias. The medical sciences have used randomized control trials and other methods to minimize bias and improve quality, but not all of these methods may effectively translate into policies on countering domestic terrorism. Several documents including the UK’s Magenta Book and OMB’s Circular A-11 guide what type of experimental, quasi-experimental, and theory-based methods are best suited for different situations.<sup>118</sup> However, policymaking “is an inherently political process” with many variables that impact the final decision.<sup>119</sup> For this reason, evidence-based policymaking is often called evidence-influenced policymaking in the social sciences and value-based decisions.

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<sup>115</sup> *Britannica*, “evidence-based policy.”

<sup>116</sup> Davies, “Is Evidence-Based Government Possible?,” 3.

<sup>117</sup> Pawson and Tilley, *Realistic Evaluation*, 2.

<sup>118</sup> Her Majesty’s Treasury, *Prudential Standards in the Financial Services Bill*, 47; Young, *Circular A-11*.

<sup>119</sup> Sutcliffe and Court, *Toolkit for Progressive Policymakers*, 3.

Moreover, in politically charged issues, the complex nature of value-based decisions results in significant controversy when applying scientific evidence. Practitioners recognize that evidence is not the only factor in policymaking and therefore an integrated approach or “evidence-informed” policymaking has been successfully applied to some of the most challenging social problems.

Following a bipartisan Commission on evidence-based policymaking which identified that there was not enough data or evaluation being used in the government’s decisions, Congress passed the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act). Following the passage of the Evidence Act, OMB released several memorandums providing guidance to agencies on the implementation process. OMB’s guidance described “four interdependent components of evidence: foundational fact-finding, policy analysis, program evaluation, and performance measurement.”<sup>120</sup> While OMB recommended that agencies consider these types of evidence in their activities, it did not explicitly define the four categories. Several organizations including the Pew-MacArthur Foundation, the Bipartisan Policy Center, and others provide different approaches to incorporating evidence in policy decisions. Table 2 incorporates the key components of these different approaches and provides the author’s recommendations on how agencies should implement OMB’s guidance as it applies to countering domestic terrorism.

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<sup>120</sup> Vought, *Phase 1 Implementation of the Foundations*, 13.

Table 2. Author’s Recommendations on Key Components of Implementing OMB’s Four Phases of Evidence

<b>OMB Guidance</b>	<b>Key Components</b>	<b>Supporting Sources (not inclusive)</b>
Foundational Fact Finding	Define the Problem	Office of Management and Budget
	Standardize the Data	Bipartisan Policy Center
		Pew-MacArthur
Inventory Programs	Pew-MacArthur	
Policy Analysis	Classify Programs	Pew-MacArthur
	Conduct Comparisons	HUD Healthy Community Assessment Tool
		National Core Indicators
Pew-MacArthur		
Performance Measurement	Develop Meaningful Metrics	Pew-MacArthur
		Health and Human Services
		Office of Management and Budget
	Capture Relevant Information	Yarbrough: The Program Evaluation Standards: A Guide for Evaluators and Evaluation Users
		Pew-MacArthur
		Bipartisan Policy Center
Establish the Evaluation Design	Office of Management and Budget	
	Health and Human Services	
	Pew-MacArthur	
Program Evaluation	Assess Evidence	Office of Management and Budget
		Pew-MacArthur
		Health and Human Services
		Bipartisan Policy Center
		Yarbrough: The Program Evaluation Standards: A Guide for Evaluators and Evaluation Users
	Report Results	Office of Management and Budget
		Pew-MacArthur
	Centralize Results	Pew-MacArthur
Office of Management and Budget		
Evidence Act		



### III. COUNTERING DOMESTIC TERRORISM THROUGH EVIDENCE-BASED POLICYMAKING

#### A. DISCUSSION

Both the executive and legislative branches of government have mandated that evidence-based policymaking be implemented in federal governmental decisional processes.<sup>121</sup> In alignment with these mandates, the 2021 *National Strategy for Countering Domestic Terrorism* recognizes that the accomplishment of its goals requires and would benefit greatly from the use of evidence in its implementation. The domestic counterterrorism strategy specifically cites that it “will ensure that its counter–domestic terrorism prevention efforts are *driven by data* [emphasis added] and informed by community–based partners. The Department of Homeland Security also has increased the grant funding available in this area in support of *evidence–based programs* [emphasis added] and with transparency regarding their use.”<sup>122</sup>

While the use of evidence has been mandated, there is little to no federal guidance on how to implement evaluation to counter domestic terrorism. Neither the *National Strategy for Countering Domestic Terrorism*, the Department of Homeland Security’s Strategic Framework for Countering Terrorism and Targeted Violence Public Action Plan, nor any other federal guidance specifies how to use evidence and data to combat domestic terrorism, understand recruitment and mobilization, and identify effective legislative reforms.<sup>123</sup> There have been evaluation efforts conducted in the United States and globally on reducing crime, but its use in the field of counterterrorism has neither been researched nor implemented extensively.

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<sup>121</sup> Foundations for Evidence-Based Policymaking Act of 2018; Vought, *Phase 1 Implementation of the Foundations*.

<sup>122</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*, 20.

<sup>123</sup> Kevin McAleenan, *Department of Homeland Security Strategic Framework for Countering Terrorism and Targeted Violence* (Washington, DC: Department of Homeland Security, 2019); National Security Council, *National Strategy for Countering Domestic Terrorism*.

Using evidence in support of domestic counterterrorism is challenging due to several factors. Primarily, there is a lack of available data—not only are attacks relatively rare, but domestic “terrorism is notoriously difficult to define.”<sup>124</sup> Differing definitions have created inconsistent statistics and “domestic [terrorism] incident datasets have been virtually unavailable.”<sup>125</sup> For example, several terrorism databases within the United States excluded domestic terrorism in the recordkeeping until recently—resulting in a lack of data for effective research and evaluation of domestic counterterrorism methods. Richard Berkebile in his work on domestic terrorism discusses that “the lack of comprehensive domestic data results in substantive questions remaining incompletely explored or completely unanswered.”<sup>126</sup> Moreover, domestic terrorism (which is typically politically or ideologically motivated) is fundamentally different from traditional crime (which is typically for personal gain or emotionally driven).<sup>127</sup> Therefore, evidence-based policies used in traditional crime (where there is significant data) may not be translated effectively into policies that counter domestic terrorism. Finally, Brian Head points out that “political leaders often insist that measurable results be available in a short time-frame, leading to greater focus on visible activities rather than building the foundations for sustainable benefits”—resulting in reduced effectiveness of the evidence-based process.<sup>128</sup> The desire for politicians to demonstrate progress tends to result in “many political decisions [that are] driven by values [and/or expediency] rather than outcomes.”<sup>129</sup> This problem is exacerbated by the bounded rationality that “policymakers can only gather

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<sup>124</sup> Berkebile, “What Is Domestic Terrorism?,” 5.

<sup>125</sup> Berkebile, 1.

<sup>126</sup> Berkebile, 2.

<sup>127</sup> K. Jack Riley and Bruce Hoffman, *Domestic Terrorism: A National Assessment of State and Local Law Enforcement Preparedness* (Santa Monica, CA: RAND Corporation, 1995), 3, [https://www.rand.org/pubs/monograph\\_reports/MR505.html](https://www.rand.org/pubs/monograph_reports/MR505.html).

<sup>128</sup> Head, “Reconsidering Evidence-Based Policy,” 84.

<sup>129</sup> Jill Rutter, *Evidence and Evaluation in Policy Making: A Problem of Supply or Demand?* (London: Institute for Government, 2012), 17, [https://www.instituteforgovernment.org.uk/sites/default/files/publications/evidence%20and%20evaluation%20in%20template\\_final\\_0.pdf](https://www.instituteforgovernment.org.uk/sites/default/files/publications/evidence%20and%20evaluation%20in%20template_final_0.pdf).

limited information before they make decisions quickly. They will have made a choice before [one has] a chance to say ‘more research is needed’!”<sup>130</sup>

**B. THE NATIONAL STRATEGY FOR COUNTERING DOMESTIC TERRORISM**

The national counterterrorism strategy is based on four pillars which have varying degrees of requirements for the use of unbiased data and evidence-based processes in its implementation.<sup>131</sup> The strategy lists some specific action items that are currently in progress, and while it does not state whether they are rooted in evidence-based programs, it routinely highlights the commitment to a science-based approach.

The first pillar in the national counterterrorism strategy focuses on the need to “Understand and Share Domestic Terrorism-Related Information.” When viewed through an evidence-based policy lens, the strategy highlights the need for “facilitating a systematic provision of information and data” in a “structured way that provides a channel for such analysis while also avoiding bias or improper influence.”<sup>132</sup> In addition, the White House stated that it will develop and share “data-driven guidance on how to recognize potential indicators of mobilization to domestic terrorism.”<sup>133</sup> There are opportunities, as stated within the strategy, to leverage the benefits of evidence, and the reduction of bias, through the appropriate use of evaluation of data.

The second pillar highlights the intent to “Prevent Domestic Terrorism Recruitment and Mobilization to Violence” and states that its efforts will be “grounded in existing evidence and best practices in public health–focused violence prevention.”<sup>134</sup> Additionally, the Administration states that it is “currently funding and implementing or planning evidence-based digital programming, including enhancing media literacy and

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<sup>130</sup> Paul Cairney, “The Politics of Evidence-Based Policymaking,” *The Guardian*, March 10, 2016, sec. Science, <http://www.theguardian.com/science/political-science/2016/mar/10/the-politics-of-evidence-based-policymaking>.

<sup>131</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*.

<sup>132</sup> National Security Council, 15, 16.

<sup>133</sup> National Security Council, 17.

<sup>134</sup> National Security Council, 20.

critical thinking skills, as a mechanism for strengthening user resilience to disinformation and misinformation online for domestic audiences.”<sup>135</sup> Although the White House has promoted this approach, there is a lot of disagreement between academics on whether effective policies and methods exist that have demonstrated a measurable reduction in terrorist activity. The identification of violent extremist risk factors and indicators is not agreed upon, and several studies provide conflicting evidence about recognizing radicalization and recruitment of terrorists. An incomplete understanding of how individuals become radicalized, as well as the challenges associated with demonstrating successful prevention of extremist behavior, has resulted in a lack of evidence of effective programs. Data collection is further exacerbated by the relative rarity of domestic terrorism cases within western-based societies and a lack of common definitions. Without agreement on recruitment and mobilization and the limited data for the complicated nature of domestic terrorism activities within the United States increases the difficulty of creating evidence-based counter-radicalization programs.<sup>136</sup> While the Administration is committed to “counterdomestic terrorism prevention efforts [that] are driven by data,” it will be challenging to implement programs that are based on evidence.<sup>137</sup>

The third pillar and fourth pillars of the Strategy are to “Disrupt and Deter Domestic Terrorism Activity” and “Confront Long-term Contributors to Domestic Terrorism.” Neither of these pillars specifically highlights the use of evidence-based policy efforts but tangentially discusses parts of the process. One aspect of evaluation is the use of interventions or experiments to determine what works and the national counterterrorism strategy does highlight that it will focus on “open, robust exchanges of ideas on novel approaches for collaboration in addressing domestic terrorism.”<sup>138</sup> As discussed previously, another critical component of responsible use of evidence is to minimize the bias within evaluation. In their efforts to combat domestic terrorism, the White House states

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<sup>135</sup> National Security Council, 20.

<sup>136</sup> Lum and Kennedy, *Evidence-Based Counterterrorism Policy*, 2012.

<sup>137</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*, 20.

<sup>138</sup> National Security Council, 25.

that they “are working to bolster efforts to ensure that law enforcement operates without bias as it identifies and responds to domestic terrorism threats.”<sup>139</sup>

### **C. STRATEGIC FRAMEWORK FOR COUNTERING TERRORISM AND TARGETED VIOLENCE PUBLIC ACTION PLAN**

The Department of Homeland Security (DHS), with the primary goal of combating terrorism, released the 2019 Strategic Framework for Countering Terrorism and Targeted Violence Public Action Plan (CTTV Plan).<sup>140</sup> Although the CTTV Plan preceded the White House’s direction to focus on evidence-based policymaking in combating domestic terrorism, the 2020 National Defense Authorization Act (NDAA) also required DHS to provide a report to Congress on specifics of “each completed or attempted incident of domestic terrorism that has occurred in the United States” since 2009.<sup>141</sup> The 2020 NDAA required that the FBI and DHS jointly develop standardized definitions of terminology relating to domestic terrorism. In response, both the FBI and DHS highlighted their definitions listed in law (U.S. Code at 18 U.S.C. 2331(5) and 6 U.S.C. 101(18) as the standardized definitions. While substantially similar, the definitions are not identical. In recognition of the existing lack of data on domestic terrorism needed to complete this report, the CTTV Plan provides direction to “coordinate a review of the current methods and platforms for data collection of national-level statistics on terrorism and targeted violence.”<sup>142</sup> In support of this direction, DHS sponsored research by RAND Corporation’s Homeland Security Operational Analysis Center (HSOAC). HSOAC completed their “Review of Public Data about Terrorism and Targeted Violence in 2021” which highlighted gaps and provided recommendations to improve data for appropriate

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<sup>139</sup> National Security Council, 28.

<sup>140</sup> Department of Homeland Security, *Strategic Framework for Countering Terrorism and Targeted Violence: Public Action Plan* (Washington, DC: Department of Homeland Security, 2020), <https://www.dhs.gov/publication/strategic-framework-countering-terrorism-and-targeted-violence>.

<sup>141</sup> National Defense Authorization Act for Fiscal Year 2020, Public Law 116-92, *U.S. Statutes at Large* 133 (2019): 1198-2316, <https://www.govinfo.gov/content/pkg/PLAW-116publ92/pdf/PLAW-116publ92.pdf>.

<sup>142</sup> Department of Homeland Security, *Strategic Framework for Countering Terrorism*, 1.

evaluation under the Evidence Act.<sup>143</sup> HSOAC identified five areas that needed data to meet DHS requirements; transnational terrorism, extremist violence in the United States [domestic terrorism is captured under this category], targeted violence, cyberthreats for strategic or political purposes, [and] school shootings.<sup>144</sup> It identified that there was a “current nonuniform application of standards across prominent databases [and that DHS needs to] invest in new data collection methods and an expedited process for identifying new data needs.”<sup>145</sup> HSOAC identified 137 databases, but despite the prevalence of databases, the HSOAC report concluded that there was “a gap between the documented quality, transparency, and rigor required for end users to have confidence in data used to study terrorism and targeted violence.”<sup>146</sup> HSOAC provided four recommendations “to improve the evidence-based study of terrorism and targeted violence.” These recommendations include increasing funding to improve databases, requiring uniform standards for data collection, investing in better collection methods, and reducing the time for data retrieval.<sup>147</sup> These efforts to improve access to data through standardization and advancing collection and retrieval processes are the first critical steps in meeting the objectives of the national counterterrorism strategy and the CTTV Action Plan.

#### **D. CHAPTER SUMMARY**

This chapter provided background on the U.S. government’s mandate that evidence-based policymaking is implemented in federal governmental decisional processes.<sup>148</sup> This approach includes efforts outlined in the 2021 *National Strategy for Countering Domestic Terrorism* that “will ensure that its counter-domestic terrorism prevention efforts are *driven by data* [emphasis added] and... [will increase] the grant

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<sup>143</sup> Joe Eyerman et al., *A Review of Public Data about Terrorism and Targeted Violence to Meet U.S. Department of Homeland Security Mission Needs* (Santa Monica, CA: RAND Corporation, 2021), [https://www.rand.org/pubs/research\\_reports/RRA1203-1.html](https://www.rand.org/pubs/research_reports/RRA1203-1.html).

<sup>144</sup> Eyerman et al., xi.

<sup>145</sup> Eyerman et al., xi.

<sup>146</sup> Eyerman et al., 33.

<sup>147</sup> Eyerman et al., *A Review of Public Data about Terrorism and Targeted Violence*.

<sup>148</sup> Foundations for Evidence-Based Policymaking Act of 2018; Vought, *Phase 1 Implementation of the Foundations*.

funding available in this area in support of *evidence-based programs* [emphasis added].”<sup>149</sup> The four pillars of the *National Strategy for Countering Domestic Terrorism* have varying degrees of requirements for the use of unbiased data and evidence-based processes in its implementation.<sup>150</sup> There are opportunities, as stated within the strategy, to leverage the benefits of evidence, and the reduction of bias, through the appropriate use of evaluation of data. However, there remains disagreement between academics on whether effective policies and methods exist that have demonstrated a measurable reduction in terrorist activity. The limited data and challenges in demonstrating successful prevention increase the difficulty of creating evidence-based counterterrorism programs.<sup>151</sup>

This chapter also described that despite the White House mandate, the Department of Homeland Security has not provided guidance on how to use evidence and data to combat domestic terrorism, understand recruitment and mobilization, and identify effective legislative reforms.<sup>152</sup> Moreover, there has been scant research on researching or implementing evaluation efforts in the field of counterterrorism. A primary factor in the absence of research is that “domestic [terrorism] incident datasets have been virtually unavailable.”<sup>153</sup> This is exacerbated by the relative rarity of domestic terrorism within the United States. Without data, evaluation of domestic counterterrorism methods becomes unreliable.

The Department of Homeland Security, in recognition of the lack of evidence to meet its objectives, contracted RAND Corporation to provide recommendations on how to improve data collection. RAND identified that there was “a gap between the documented quality, transparency, and rigor required for end users to have confidence in data used to study terrorism and targeted violence.”<sup>154</sup> RAND recommended increasing funding to improve databases, requiring uniform standards for data collection, investing in better

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<sup>149</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*, 20.

<sup>150</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*.

<sup>151</sup> Lum and Kennedy, *Evidence-Based Counterterrorism Policy*, 2012.

<sup>152</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*.

<sup>153</sup> Berkebile, “What Is Domestic Terrorism?,” 1.

<sup>154</sup> Eyerman et al., *A Review of Public Data about Terrorism and Targeted Violence*, 33.

collection methods, and reducing the time for data retrieval.<sup>155</sup> These efforts to improve access to data through standardization and advancing collection and retrieval processes are the first critical steps in meeting the objectives of the national counterterrorism strategy.

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<sup>155</sup> Eyerman et al., *A Review of Public Data about Terrorism and Targeted Violence*.



## **IV. EXAMPLES OF EVIDENCE-BASED POLICYMAKING IN U.S AND FOREIGN PROGRAMS**

This chapter provides an analysis of three case studies of evidence-based programs. The analysis is designed to identify lessons learned for implementation in developing evidence-based policy to counter domestic terrorism in support of the United States national strategy. The three case studies are based in the United Kingdom and the United States and include:

- The implementation of the Cardiff Model (developed in the United Kingdom) in the greater Milwaukee region of Wisconsin to reduce crime.
- The United Kingdom’s Crime Reduction Program which was ultimately deemed a failure due to poor implementation stemming from a political desire to achieve results too quickly.
- The Los Angeles Framework for Countering Violent Extremism is a health-based prevention model modified to improve community-based policing efforts.

The recommendations from each of these case studies, as they apply to countering domestic terrorism are incorporated in Chapter V.

### **A. REDUCING VIOLENCE IN THE UNITED STATES USING THE CARDIFF MODEL**

#### **1. Background**

In 2014, Milwaukee’s violent crime rate placed it as the nation’s 9th most dangerous place to live in the United States.<sup>156</sup> The Milwaukee crime statistics for that year were significantly above average and on the rise with 90 murders and 4,859 assaults (when compared to violent crime in the United States, Milwaukee was four times as

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<sup>156</sup> “The 10 Most Dangerous Cities in America,” MarketWatch, accessed June 5, 2021, <https://www.marketwatch.com/story/the-10-most-dangerous-cities-in-america-2014-11-20>.

dangerous as the average city in the United States in 2014).<sup>157</sup> In previous years, the emergency department treated more than 500 assault cases, and the Child Advocacy Centers saw 7,000 incidents of child abuse across the entire state.<sup>158</sup> In an effort to reduce violence, the Milwaukee suburb of West Allis decided to turn to an evidence-based program called the Cardiff Model, an overseas solution to violence that collected hospital data and passed that information to the police department.

Research shows that police knowledge of violence relies on injured people reporting to the police. But many do not report, for fear of reprisals, because they don't want their own behavior scrutinized and because they don't know who injured them and therefore don't think the police can help. People who carry or use weapons, are involved in the drug trade, are regularly intoxicated with alcohol, or who are gang members, aren't going to report violence to the police; yet such people are those who are most likely to be injured in violence.<sup>159</sup>

Like all evidence-based policymaking, the Cardiff Model, developed at Cardiff University in Wales, capitalizes on the use of data and evaluation when making a decision. The Model collects data from hospital emergency departments including the precise geographic location of the violence, the type of weapon used, the names of any involved parties, and the time of the incident. The data is then made anonymous and placed into a database that is shared with local police and city governments.<sup>160</sup> To gain a clearer picture of trending violence areas in a city, the Cardiff Model uses the data acquired at hospitals to overlay exact locations with increased violence rates. This data then allows analysts to identify hot spots across the communities which may have previously been unknown. The detection of these localized areas helps improve law enforcement prevention and response efforts, ultimately improving safety in the community. This approach resulted in a 35%

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<sup>157</sup> "Crime in Milwaukee, Wisconsin (WI): Murders, Rapes, Robberies, Assaults, Burglaries, Thefts, Auto Thefts, Arson, Law Enforcement Employees, Police Officers, Crime Map," City-Data.com, accessed June 5, 2021, <https://www.city-data.com/crime/crime-Milwaukee-Wisconsin.html>.

<sup>158</sup> Michael Levas, "Safe MKE: How Community Leaders Are Coming Together to Prevent Violence," Children's Wisconsin NewsHub, January 19, 2017, <https://childrenswi.org/NewsHub/stories/safe-mke-how-community-leaders-are-coming-together-to-prevent-violence>.

<sup>159</sup> Shepherd, "What the Cardiff Model Can Teach Us."

<sup>160</sup> "Approaches to Reducing Violence in Cities," World Health Organization, accessed May 26, 2021, <https://www.who.int/health-topics/urban---health/cities-spotlight/approaches-to-reducing-violence-in-cities>.

reduction in violence-related hospital admissions and a 42% reduction in serious violence recorded by the police in the United Kingdom.<sup>161</sup> Moreover, the CDC describes the Cardiff Model as providing “a straightforward framework for hospitals, law enforcement agencies, public health agencies, community groups, and others interested in violence prevention to work together and develop collaborative violence prevention strategies.”<sup>162</sup>

In the United Kingdom, the Cardiff Model has proven effective in unanticipated ways when it was first developed, for example, identifying and tackling gang violence and locating crack houses.<sup>163</sup> A process evaluation on Cardiff violence prevention found that “for every \$1 spent, nearly \$15 in the health system and over \$19 in criminal justice system costs are saved,” resulting in a total savings of \$6.6 million.<sup>164</sup> Evaluation of the data “determined that domestic violence is predominant in rural areas while cities tend to produce alcohol- and tavern-related violence.”<sup>165</sup>

The Cardiff Model has also been implemented internationally with varying degrees of success. In Kingston, Jamaica, St. Williams Park was identified as a hotspot for crime even though injuries were not reported to the police.<sup>166</sup> “In Australia, emergency department doctors began asking intoxicated minors with injuries where they had been

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<sup>161</sup> Crime and Security Research Institute, “Cardiff Model for Violence Prevention” (Cardiff, UK: Cardiff University, 2017), 1, <https://www.cardiff.ac.uk/crime-security-research-institute/publications/research-briefings/the-cardiff-model>.

<sup>162</sup> James A. Mercy, *Cardiff Model Toolkit: Community Guidance for Violence Prevention* (Atlanta: Centers for Disease Control and Prevention, 2018), 9, <https://www.cdc.gov/violenceprevention/pdf/cardiffmodel/cardiff-toolkit508.pdf>.

<sup>163</sup> Shepherd, “What the Cardiff Model Can Teach Us.”

<sup>164</sup> Laura M. Mercer Kollar et al., “Building Capacity for Injury Prevention: A Process Evaluation of a Replication of the Cardiff Violence Prevention Programme in the Southeastern USA,” *Injury Prevention* 26, no. 3 (June 2020): 221–28, <https://doi.org/10.1136/injuryprev-2018-043127>.

<sup>165</sup> Talis Shelbourne, “A Violence Prevention Model from the United Kingdom Could Help Reduce Violence in the Milwaukee Area,” *Milwaukee Journal Sentinel*, November 4, 2019, <https://www.jsonline.com/story/news/solutions/2019/11/04/violence-prevention-model-worked-uk-may-help-milwaukee-area/1749331001/>.

<sup>166</sup> Cory Robinson, “Problems in St William Grant Park—Hospital Data Shows Several Serious Crimes Not Reported to the Police,” *Jamaica Gleaner*, December 6, 2018, <https://jamaica-gleaner.com/article/news/20181209/problems-st-william-grant-park-hospital-data-shows-several-serious-crimes-not>.

drinking; the results identified bars serving alcohol to minors.”<sup>167</sup> Despite successes in other countries, the United States has different gun laws, privacy rights, and health insurance, so the West Allis experiment was important in creating data for evaluation.

## **2. Implementing the Cardiff Model in the United States**

In a report on injury prevention, Mercer Kollar et al. described “violence [as] a major public health problem in the USA. In 2016, more than 1.6 million assault-related injuries were treated in U.S. emergency departments.”<sup>168</sup> According to a U.S. Department of Justice report in 2015, 53% of all violent crimes and 43% of violent crimes involving an injury go unreported to law enforcement.<sup>169</sup> The Centers for Disease Control and Prevention (CDC) noted that this “means cities and communities lack a complete understanding of where violence occurs, which limits the ability to develop successful solutions.”<sup>170</sup> Recognizing a need to address these issues, the CDC embraced the information-sharing approach and created the “Cardiff Model Toolkit: Community Guidance for Violence Prevention which provides a straightforward framework for hospitals, law enforcement agencies, public health agencies, community groups, and others interested in violence prevention to work together and develop collaborative violence prevention strategies.”<sup>171</sup> While the linkages between violent criminals and domestic terrorists are not well-defined, and beyond the scope of this paper, the process of evaluation and lessons learned from implementing the Cardiff Model can be used to improve other evidence-based policymaking in the United States.

## **3. Challenges of Using the Cardiff Model in the United States**

One of the challenges for the Cardiff Model is how the federal government collects violent crime data. Until the beginning of 2021, the two primary sources of government

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<sup>167</sup> Shelbourne, “A Violence Prevention Model.”

<sup>168</sup> Mercer Kollar et al., “Building Capacity for Injury Prevention,” 221.

<sup>169</sup> Rachel E. Morgan and Grace Kena, *Criminal Victimization, 2016: Revised* (Washington, DC: Bureau of Justice Statistics, 2018), 30, <https://bjs.ojp.gov/content/pub/pdf/cv16.pdf>.

<sup>170</sup> Mercy, *Cardiff Model Toolkit*, 1.

<sup>171</sup> Mercy, 1.

crime statistics, the Federal Bureau of Investigation (FBI) and the Bureau of Justice Statistics used systems that painted an imperfect picture. The Bureau of Justice Statistics uses the National Crime Victimization Survey (NCVS) and until January 1, 2021, the FBI used the Summary Reporting System (SRS) within the Uniform Crime Reporting (UCR) program to gather information on “homicide, forcible rape, robbery, aggravated assault, burglary, larceny-theft, motor vehicle theft, and arson.”<sup>172</sup> However, the FBI’s system only allowed for one crime to be reported per incident.

Significant methodological and definitional differences existed between how serious violent crimes are measured in the FBI system and Justice Statistics system. The FBI system included homicide and commercial crimes, while the Justice Statistics system excludes these crime types. For example, due to the nature of the crime and how it captures data, the Justice Statistics system does not include murder as a serious violent crime. One system excluded sexual assault, while the other included it.

In an effort to improve the overall quality of crime data, the FBI officially retired the older system on January 1, 2021, and transitioned to a National Incident-Based Reporting System within the UCR, which “captures details on each single crime incident—as well as on separate offenses within the same incident—including information on victims, known offenders, relationships between victims and offenders, arrestees, and property involved in crimes.”<sup>173</sup> When fully implemented across law enforcement agencies, the new system will significantly improve the quality and quantity of data available to researchers and senior officials to implement evidence-based policy decisions.

#### **4. The Cardiff Model in the Milwaukee Suburb of West Allis**

West Allis is a suburb of Milwaukee County, WI with approximately 60,000 people. The VFWAC noted that “each year there are over 600 occurrences of interpersonal violence [in West Allis]. The bulk of the violent occurrences are simple assaults and largely

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<sup>172</sup> Department of Justice, “The Nation’s Two Crime Measures” (Washington, DC: Department of Justice, 2004), 1, <https://bjs.ojp.gov/content/pub/pdf/ntcm.pdf>.

<sup>173</sup> “National Incident-Based Reporting System (NIBRS),” Services, accessed July 17, 2021, <https://www.fbi.gov/services/cjis/ucr/nibrs>.

of a domestic nature ...primarily occurring at home, which makes it difficult to ‘see’ violence in our community.”<sup>174</sup> The Health Department and the Medical College of Wisconsin worked together to form a collaborative made up of employees from local government, social service providers, and other agencies to address violent crime in West Allis.<sup>175</sup> Every month, a group of members across the health and safety community analyzes data from West Allis police, emergency medical services, and several hospitals and medical centers. During the meetings, the group collaborates on understanding the data and how to create solutions to address the violence. Michael Levas, a pediatric emergency medicine physician who helped implement the Cardiff Model at Children’s Wisconsin, listed some of the findings uncovered by VFWAC in 2017.

For example, in the past year, we saw 10 injuries within a 500-foot area. We examined that location and found it contained four bars and a liquor store. It’s no secret that drugs and alcohol are common contributing factors to acts of violence. We also learned that 40 percent of all of the assaults happened in or around schools. Schools must be a safe space for children. Now armed with this knowledge, the community and law enforcement can begin to devise and implement targeted plans to prevent these incidents from happening in the first place.<sup>176</sup>

In West Allis, community leaders were at the forefront of incorporating data from violence in hospitals into prevention methods. The group brought together critical stakeholders from law enforcement, public safety, businesses, and community services organizations to “identify data-informed and place-based strategies to target violence in the City of West Allis and specific neighborhoods with high violence rates.”<sup>177</sup> A vital component is that every reported injury is closely scrutinized to ensure that the appropriate prevention program is applied. For instance, extra law enforcement patrols in areas heavily

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<sup>174</sup> Violence Free West Allis Collaborative, *Violence Free West Allis Cooperative: Action Plan* (West Allis, WI: West Allis City Hall, 2020), 4, <https://www.westalliswi.gov/DocumentCenter/View/15633/VFWAC-Strategic-Action-Plan>.

<sup>175</sup> Shelbourne, “A Violence Prevention Model.”

<sup>176</sup> Levas, “Safe MKE.”

<sup>177</sup> “Violence Free West Allis,” West Allis Official Website, accessed June 2, 2021, <https://www.westalliswi.gov/1758/Violence-Free>.

populated with liquor stores will not significantly reduce domestic violence, but increased policing at crowded bars has shown a reduction in violent crime.<sup>178</sup>

## 5. Lessons Learned from the Cardiff Model

The United States brings additional challenges over those experienced in the United Kingdom. Britain has a universal public health care system with shared information.<sup>179</sup> In contrast, the U.S. has a private insurance model with proprietary information and restrictions on sharing due to the Health Insurance Portability and Accountability Act.<sup>180</sup> Protection of confidential patient information is a major consideration in the implementation of the Cardiff Model.<sup>181</sup> The inability to share data across hospitals without consent means that each and every hospital in a populated area (which could be dozens) has to overcome internal bureaucratic struggles, resolve legal challenges, and develop independent information-sharing agreements. Many hospitals are not funded for these additional expenses nor want to participate in this type of program. In their research Mercer Kollar et al. noted that “unlike the original implementation of the Cardiff Model in Wales, the local law enforcement partner [in major cities in the United States] serves a large geographical area which includes multiple hospitals. In large metropolitan areas, data from multiple hospitals is likely needed to fully reveal unknown hotspots. Thus, more hospitals and law enforcement agencies, working in collaboration, are needed to create more complete violence maps.”<sup>182</sup> In addition, much of the violence in the U.S. can be attributed to guns, which has a rate of firearm homicides 100 times greater than in Britain.<sup>183</sup> Reducing violence due to guns may require politically unfeasible gun control

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<sup>178</sup> Sam Bieler and John Roman, “Addressing Violence and Disorder around Alcohol Outlets” (Washington, DC: District of Columbia Crime Policy Institute, 2013), <https://doi.org/10.1037/e529002013-001>.

<sup>179</sup> Mercer Kollar et al., “Building Capacity for Injury Prevention.”

<sup>180</sup> Mercer Kollar et al.; Health and Human Services, “Your Medical Records,” Health and Human Services, accessed July 16, 2021, <https://www.hhs.gov/hipaa/for-individuals/medical-records/index.html>.

<sup>181</sup> Mercy, *Cardiff Model Toolkit*, 6.

<sup>182</sup> Mercer Kollar et al., “Building Capacity for Injury Prevention,” 227.

<sup>183</sup> Jonathan Masters, “U.S. Gun Policy: Global Comparisons,” Council on Foreign Relations, June 10, 2022, <https://www.cfr.org/backgrounder/us-gun-policy-global-comparisons>.

regulations, which are likely outside the jurisdiction of partners participating in the Cardiff Model system. These differences alone will make collecting health data and implementing effective evidence-based policy decisions on violence prevention more difficult.

For the Cardiff Model to be effective, measures must be implemented appropriately with a standardized focus on methods of prevention and response that result in the goals of the program—in this case, a reduction in violence. Jonathan Shepherd highlighted this shortfall when noting that “in England, unfortunately, the Cardiff Model was translated as Information Sharing to Tackle Violence (ISTV), as if information sharing on its own prevents violence, which of course it doesn’t. Highly responsive, multi-agency Violence Reduction Units, a core component of the Model, are also needed to turn the information into practical prevention. Every city and large town needs one.”<sup>184</sup>

The Cardiff Model was concurrently implemented in Atlanta and Philadelphia and may provide additional statistics for measures of success. In the Atlanta metropolitan area, a “Cardiff Model partnership was established at a large, urban Emergency Department with a level I trauma designation and local metropolitan law enforcement agency.”<sup>185</sup> A 2015 to 2017 study focused on implementation in Atlanta reveals that a similar process was developed within West Allis.<sup>186</sup> In Atlanta, “after visiting the hotspot area and several meetings with the L.E. precinct commander and staff, an active community representative and a local business group; the United States Injury Prevention Partnership piloted a Safety Improvement Project with the precinct and three area businesses to implement violence prevention interventions. These included: supporting existing law enforcement work (e.g., improving patrols), supporting local youth engagement activities (e.g., youth basketball program), business environmental improvements (e.g., cleaning the lot and adding plants), and business safety improvements (e.g., increasing lighting and security cameras).”<sup>187</sup>

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<sup>184</sup> Shepherd, “What the Cardiff Model Can Teach Us.”

<sup>185</sup> Mercer Kollar et al., “Building Capacity for Injury Prevention,” 221.

<sup>186</sup> Mercer Kollar et al., “Building Capacity for Injury Prevention.”

<sup>187</sup> Mercer Kollar et al.



The results in West Allis are not yet mature and more analysis of crime trends is necessary to make a conclusion on the effectiveness of the experiment. Similar to West Allis, the results in Atlanta are not yet complete and analysis of effectiveness is ongoing. In Philadelphia, the approach was unsuccessful because officials there could not solve the challenging problem of combining multiple proprietary health care systems or the legal challenges of sharing healthcare information outside the medical system with law enforcement agencies. Regardless of levels of success, the information that is eventually gleaned from the programs will be useful in determining how to implement the next intervention to improve violence prevention.

Table 3. Lessons Learned from the Cardiff Model

- Evidence-based policymaking agencies must establish a common methodology before beginning an intervention. The development of a common framework and guidelines may be useful in establishing consistency across agencies.
- Standardized data and sharing procedures are critical to successful evidence-based decisions in interagency programs.
- Metrics of interventions must be incorporated into successive iterations to ensure the desired goals are being accomplished.

## **B. CRIME REDUCTION PROGRAM IN THE UNITED KINGDOM**

### **1. Background**

The United Kingdom's Crime Reduction Program is based on the principles of evidence-based policymaking and provides an opportunity to examine experiences and lessons learned as the United States embarks on implementing evidence towards countering domestic terrorism. The UK Crime Reduction Program was conceived in 1999 as a research-driven initiative, but ultimately ended in 2002 with poor results and was heralded as an example of policy-driven evidence. The lessons learned in the United Kingdom can

be correlated to addressing similar politically charged issues in the United States such as combating targeted violence and domestic terrorism. This section focuses on the government of the United Kingdom's efforts "to accumulate, disseminate and use research-based knowledge about the effectiveness of a wide variety of interventions" to reduce crime.<sup>188</sup> While domestic crime and domestic terrorism are not the same, the principles of evidence-based policymaking in the social sciences are still applicable and lessons can be learned from the UK's efforts.

The United Kingdom has been one of the forerunners in converting the principles of evidence-based medicine into evidence-based policy.<sup>189</sup> The Blair government incorporated evidence-based policymaking in the late 1990s by encouraging rationalized decision-making by promoting what the Prime Minister defined as "what matters is what works."<sup>190</sup> This slogan grew into the What Matters is What Works initiative and one of the UK government's key projects was the UK Crime Reduction Program. The UK Crime Reduction Program "represents the most comprehensive, systematic and far-sighted initiative ever undertaken by a British government to develop strategies for tackling crime."<sup>191</sup> The UK government began this program with funding of £250 million and it was designed "to be a road map for guiding long-term investment strategies for the government in its continuing effort to drive down crime."<sup>192</sup> "This program had three goals:

1. To achieve a sustained reduction in crime.
2. To improve and mainstream knowledge of best practices.

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<sup>188</sup> Maguire, "The Crime Reduction Programme in England and Wales," 213.

<sup>189</sup> *Britannica*, "evidence-based policy."

<sup>190</sup> Eric Shaw, "What Matters Is What Works: The Third Way and the Case of the Private Finance Initiative," in *The Third Way and Beyond: Criticisms, Futures, Alternatives*, ed. Sarah Hale, Will Leggett, and Luke Martell (Manchester, UK: Manchester University Press, 2004), 64–82, <https://doi.org/10.7765/9781526137883.00010>.

<sup>191</sup> Maguire, "The Crime Reduction Programme in England and Wales," 214.

<sup>192</sup> Peter Homel et al., *Investing to Deliver: Reviewing the Implementation of the UK Crime Reduction Programme* (London: Home Office Research, 2004), v, <https://webarchive.nationalarchives.gov.uk/ukgwa/20091207103024/http://www.crimereduction.homeoffice.gov.uk/crpevaluation.htm>.

3. To maximize the implementation of cost-effective crime reduction activity.”<sup>193</sup>

## **2. Lessons Learned in the UK Crime Reduction Program**

Despite the UK’s focus on implementing evaluation and history of conscientious application in its decision-making processes, it had significant challenges when implementing the Crime Reduction Program due to three factors:

1. Over-ambitious agenda with too little oversight;
2. Over-reliance on evaluation in a field with relatively scarce qualitative data; and
3. A political environment searching for quick results.<sup>194</sup>

The advent of the UK’s Crime Reduction Program was “the most ambitious, best-resourced and most comprehensive effort for driving down crime ever attempted in a Western developed country.”<sup>195</sup> Unfortunately, its large scale at the beginning may have also been its Achilles Heel resulting in its downfall. The over-ambitious agenda “suffered from major practical problems caused by unfeasible timescales, slow-moving bureaucratic procedures, and shortages of capacity.”<sup>196</sup> This was exacerbated by too little oversight of the projects resulting from “a general lack of experience among both Home Office and regional staff in these kinds of tasks.”<sup>197</sup> For example, one of the major projects involved burglary reduction, but had several implementation failures due to the “absence of a project manager, lack of staff or staff changes, inappropriate, or unrealistic or overly ambitious interventions.”<sup>198</sup> While heavily resourced, the aggressive approach to the UK’s Crime Reduction Program is an important lesson when applying evidence-based policy in the

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<sup>193</sup> Homel et al., v.

<sup>194</sup> Maguire, “The Crime Reduction Programme in England and Wales.”

<sup>195</sup> Homel et al., *Investing to Deliver*, i.

<sup>196</sup> Maguire, “The Crime Reduction Programme in England and Wales,” 213.

<sup>197</sup> Maguire, 222.

<sup>198</sup> Homel et al., *Investing to Deliver*, 36.

United States. Implementation efforts should be conducted in a methodical and gradual approach to avoid failure from the lack of capacity experienced by the UK.

The second reason for the lack of success in the program was the over-reliance on evaluation in a field with relatively scarce qualitative data. Evidence-based policymaking requires significant measurement of data to determine if an experiment or initiative is producing the desired results. In several cases, researchers did not have access or “the inclusion of the appropriate data, thereby effectively reducing the power of the evaluation process.”<sup>199</sup> The implementation of several programs resulted in not understanding the criticality of data collection and “the problem nationally did not come to light until at least a year into the Crime Reduction Program. In many cases, too, it was too late to rescue the situation in terms of producing the necessary quality and quantity of data.”<sup>200</sup> For example, several projects within the program were faced with situations where “available data were insufficiently reliable, or contained too few crimes or cases for valid statistical analysis, [so] the evaluator would be left without anything useful to say about the effectiveness of the program.”<sup>201</sup> The lack of data, particularly with evidence-based policymaking initiatives, will often result in less than desirable outcomes due to the inability to measure performance. When implementing evaluation in policymaking, researchers must ensure appropriate data sets are established early and applied consistently during the experimentation process. This becomes more important in the social sciences, such as countering domestic terrorism, where data may not be easily measured.

The final key ingredient in the failure of the Crime Reduction Program was the desire to produce results quickly in a politically charged arena. It was marketed as a quick way to address the challenging issue of crime reduction. In his report, Mike Maguire noted that “although initially conceived essentially as a set of experiments or pilot projects, the Crime Reduction Program was ... expected to contribute significantly (and quickly) to the achievement of performance targets...including highly challenging crime reduction targets

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<sup>199</sup> Homel et al., 23.

<sup>200</sup> Maguire, “The Crime Reduction Programme in England and Wales,” 229.

<sup>201</sup> Maguire, 230.

such as a 30 percent reduction in vehicle crime ... and a 25 percent reduction in burglary” in the first five years.<sup>202</sup> In short, “too much was expected, in too short a time” and “it was vulnerable both to the impatience for ‘results’ characteristic of government ministers, for whom ... the electoral cycle is a key temporal framework.”<sup>203</sup> Unfortunately, the beginning of the program paradoxically aligned with an “increase in the overall recorded crime figure” which added increased pressure on researchers to quickly provide results despite the intent of the program to operate over at least ten years to create a database of knowledge.<sup>204</sup> “In a political culture that is driven to a large extent by expediency, reactions to events, and relatively short term goals and targets,” the ability to effectively implement evidence-based policy as it has been designed becomes extremely challenged.<sup>205</sup> Mike Maguire points out that “the central focus of the Crime Reduction Program began a clear shift away from the need for good research evidence about ‘what works’, towards an emphasis on delivering crime reduction outcomes as soon as possible.”<sup>206</sup> Politicians often high-jacked the process and espoused a “common-sense” approach, such as the inclusion of more CCTV systems across the country despite a dearth of evidence that these systems reduced crime.<sup>207</sup> Understanding the political climate, and creating procedures to mitigate the impacts of changing administrations are important when developing evidence-based programs. The United States is also subject to the shifting currents of public policy and must be wary of evidence-based decisions “taking second place to a perceived need to react decisively to short-term changes.”<sup>208</sup>

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<sup>202</sup> Maguire, 218.

<sup>203</sup> Maguire, 215, 217.

<sup>204</sup> Maguire, 224.

<sup>205</sup> Maguire, 232.

<sup>206</sup> Maguire, 224.

<sup>207</sup> Brandon C. Welsh and David P. Farrington, *Crime Prevention Effects of Closed Circuit Television: A Systematic Review* (London: Home Office Research, 2003).

<sup>208</sup> Maguire, “The Crime Reduction Programme in England and Wales,” 225.

Table 4. Shortfalls in the UK Crime Reduction Program

Shortfall	Things to Avoid in Future Programs
Over-ambitious agenda with too little oversight	<ul style="list-style-type: none"> <li>• unfeasible time scales (expected results in the first five years from experiments designed to perform for ten years)</li> <li>• bureaucracy slowed down expected timelines</li> <li>• shortage of capacity</li> <li>• lack of oversight of projects</li> <li>• lack of experience in evaluation design</li> </ul>
Over-reliance on evaluation w/ scarce data	<ul style="list-style-type: none"> <li>• lack of qualitative data (too few crimes for statistical analysis)</li> <li>• unreliable data (programs did not properly set up experiments to capture appropriate data)</li> </ul>
Political environment searching for quick results	<ul style="list-style-type: none"> <li>• Performance targets were set before evaluation of experiments could occur</li> <li>• Politicians needed results before the next election cycle</li> <li>• Crime began trending upward before experiments could provide results</li> </ul>

### 3. Comparing the United States and the United Kingdom

An analysis of the UK approach to evidence-based policymaking and the environment within the UK must be compared against the United States before determining how the United States can learn from the failures of the UK Crime Reduction Program. This section will demonstrate that the lessons learned from these three factors of failure can be applied in the United States due to a close correlation between the U.S. and the UK, particularly concerning social policy issues that are politically charged.

The challenges with implementing evidence-based policy in the United States have many similarities with the UK including: the research necessary to provide answers to relevant policy questions takes too much time; the lack of good usable data with which to conduct research and evaluation; and politicians continue to be driven by value decisions instead of evidence due to a continuous pressure to be re-elected.

In many social policy issues, the problem has often been identified (e.g., populations with low employment, high homelessness, chronic disease, increased suicide, substance abuse, high school dropout rates, substandard health care); however, finding solutions is not immediately available or does not have the appropriate research demonstrating positive results. A properly developed evidence-based approach takes time and resources to establish an accepted methodology, including measuring impacts across a statistically significant group for an appropriate period. Successful results may not be obtainable for several years. Often, the policymakers' timeline to demonstrate results is much shorter than the time required for appropriate research. In one of a series of seminars held within the UK, Kevan Collins, Chief Executive of the Education Endowment Foundation, noted "that there is still an instinctive belief you can do it quickly... [there is an] imperative to solve problems right now. Education policy is littered with reforms of good intentions without evidence."<sup>209</sup> Rutter also notes that in addition to decision-makers not understanding the time required to conduct proper research, "some academics find it difficult to engage effectively with the policy process" for the inverse reason.<sup>210</sup> OMB guidance attempts to mitigate this by highlighting that evidence and evaluation take a long time and should be "free from political considerations," but there is still much work to be done to instill this culture in policymakers.<sup>211</sup>

One of the primary reasons currently impacting both the UK and the United States is the shortage of data that has been collected about programs and policies. OMB notes that "federal agencies often lack the data and evidence necessary to make critical decisions about program operations, policy, and regulations."<sup>212</sup> Despite being a leader in the field of evidence-based policy, the United Kingdom also has "a lack of good usable data to provide the basis for research both within and outside government."<sup>213</sup> There also exists a lack of mechanisms that link data across government agencies as well as a lack of ability

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<sup>209</sup> Rutter, *Evidence and Evaluation in Policy Making*, 12.

<sup>210</sup> Rutter, 10.

<sup>211</sup> Young, *Evidence-Based Policymaking*, 18.

<sup>212</sup> Vought, *Phase 1 Implementation of the Foundations*, 1.

<sup>213</sup> Rutter, *Evidence and Evaluation in Policy Making*, 10.

for agencies “to answer simple but important questions about the populations that their policies were supposed to target—or benefit.”<sup>214</sup> Data is the key factor in evidence-based policymaking and the dearth of data in the social sciences is the limiting element in developing effective programs.

Finally, the political system in both the United States and the United Kingdom (and other democratic countries) is not prejudiced towards using facts in the decision-making process. Political systems based on popular votes require elected officials to keep constituents engaged and demonstrate commitment to the values that they embrace.<sup>215</sup> It has been suggested that evidence-based policymaking is not sustainable in these types of electoral systems because, in the pressurized world of politics, the standards of evaluation cannot be met as representatives take shortcuts to keep their voters happy.<sup>216</sup> This paradigm tends to result in “many political decisions [that are] driven by values rather than outcomes—[because] sometimes the ‘evidence-driven’ answer brought significant political risk.”<sup>217</sup> Both the United Kingdom and the United States have to overcome the challenges of implementing evidence in a political system that results in high turnover due to the election cycle.

Despite the similarities in the conditions surrounding the implementation of evidence in the two nations, there remain some stark differences that may impact the success of the United States in its efforts. Although the UK has traditionally been the forerunner in the use of evaluation in the social sciences, there is no mandate for national agencies in the UK to use evidence in decision-making. Although it is too early to tell, in the United States, it is likely that the mandate for federal agencies to implement evaluation, as required in the Evidence Act, will improve its success and effectiveness when compared to the UK. Conversely, although the UK does not have a mandate, they have provided created institutions, such as the Economic and Social Research Council and the Evaluation

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<sup>214</sup> Rutter, 13.

<sup>215</sup> Head, “Reconsidering Evidence-Based Policy.”

<sup>216</sup> Cairney, “The Politics of Evidence-Based Policymaking.”

<sup>217</sup> Rutter, *Evidence and Evaluation in Policy Making*, 17.



Task Force, which both fund evaluation and encourage a culture of using evidence.<sup>218</sup> In addition, there has been a concerted effort in the UK to develop and implement clear guidelines as well as centers of excellence for evaluation. The differences between the two nations' approaches to evidence may be beneficial to the United States in some cases while slowing the process in others.

The UK has established several comprehensive guidebooks to help the government with its implementation of evaluation. Two primary documents were published by the UK government, the Green Book and the Magenta Book. "The Magenta Book has been written for government decision-makers and government analysts to help them understand the role of evaluation and the processes and methods for conducting an evaluation."<sup>219</sup> The Green Book "provides guidance on the design and use of monitoring and evaluation before, during and after implementation."<sup>220</sup> As discussed previously, the Office of Management and Budget's guidance is very generalized and only provides the foundation for a framework to implement evidence—not to the level provided by the government of the United Kingdom. To supplement OMB guidance concerning homeland security issues like countering domestic terrorism, DHS released Directive Number 069–03 stating that the "DHS is committed to ensuring a strong culture of evaluation, evidence building, and organizational learning."<sup>221</sup> In actuality, DHS Directive 069–03, along with 069–03-001 released a few days later, only restates OMB guidance with very little additional direction on the steps needed to conduct effective evaluation of DHS programs.<sup>222</sup> The

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<sup>218</sup> "Economic and Social Research Council (ESRC)," UK Research and Innovation, accessed April 15, 2022, <https://www.ukri.org/councils/esrc/>; "Evaluation Task Force," About Us, accessed April 15, 2022, <https://www.gov.uk/government/organisations/evaluation-task-force/about>.

<sup>219</sup> Her Majesty's Treasury, *Prudential Standards in the Financial Services Bill*, 15.

<sup>220</sup> Her Majesty's Treasury, *The Green Book: Central Government Guidance on Appraisal and Evaluation*. (London: Her Majesty's Treasury, 2020), 9, [https://www.webarchive.org.uk/access/resolve/20201125231833/https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/938046/The\\_Green\\_Book\\_2020.pdf](https://www.webarchive.org.uk/access/resolve/20201125231833/https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938046/The_Green_Book_2020.pdf).

<sup>221</sup> Alles, *Program, Policy, and Organizational Evaluations*, 1.

<sup>222</sup> Alles, *Program, Policy, and Organizational Evaluations*; Stacy A. Marcott, *Program, Policy, and Organizational Evaluations Update*, DHS Directive 069-03-001 (Washington, DC: Department of Homeland Security, 2021).

memorandums and directives issued by the United States federal government lack specificity when compared to the guidance provided in the United Kingdom.

In addition to clear guidance in the Green and Magenta Books, the UK has invested in several workshops and centers for excellence in bringing evidence-based policymaking tools to the end-user. One of these organizations is the Policy Lab which is “a creative space where policy teams can develop the knowledge and skills to develop policy in a more open, data-driven, digital and user-centered way.”<sup>223</sup> Additionally, the UK has established a network of centers that focus on what works. “The network is made up of 9 independent What Works Centers [which] are different from standard research institutions. Each center is committed to increasing both the supply of, and demand for, evidence in their policy area, and their output is tailored to the needs of decision-makers.”<sup>224</sup> Though the Department of Education has created the Institute for Education and the Department of Health and Human Services has created the Office of Planning, Research and Evaluation to Sciences to focus on evaluation within its own departmental initiatives—the United States has not funded any similar sort of centers to support a comprehensive alliance for evaluation. Private organizations, like the Pew-MacArthur’s Results First Initiative and Arnold Ventures, have created example cases and guides which can be used by the government in its evidence-based policymaking initiatives.<sup>225</sup>

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<sup>223</sup> “About Policy Lab,” *Policy Lab* (blog), accessed March 16, 2022, <https://openpolicy.blog.gov.uk/about/>.

<sup>224</sup> “What Works Network,” Public Services, accessed March 16, 2022, <https://www.gov.uk/guidance/what-works-network>.

<sup>225</sup> Sara Dube, “Results First Initiative,” Pew Charitable Trusts, accessed March 24, 2022, <https://pew.org/382k9ML>; Laura Arnold and John Arnold, “About Arnold Ventures,” Arnold Ventures, accessed March 24, 2022, <https://www.arnoldventures.org/about>; and Urahn and Caudell-Feagan, *Evidence-Based Policymaking*.

Table 5. Lessons Learned from the UK Crime Reduction Program

- Provide enough time for data and evidence to be collected to properly inform decisions before changing policies. Develop measures to combat policy-based evidence driven by political expediency.
- Standardize the data and build systems before beginning the program to properly collect, store, and share data.
- Ensure experts are involved in the process when developing evaluation-based policies. If the expertise does not reside in-house, consider hiring, outsourcing, or training a cadre of professional evaluators who can review, compile and communicate the data effectively.
- Create institutes or centers of excellence to facilitate the development and execution of agency-driven initiatives in an evidence-based approach.
- Develop a common framework and clear guidelines that provide detailed direction to federal agencies on how to properly apply evaluation in social issues. The United States should consider developing a comprehensive guide like the Magenta Guide used in the United Kingdom.<sup>226</sup>

## C. COUNTERING VIOLENT EXTREMISM IN LOS ANGELES

### 1. Background

In 2011, the White House released the “Empowering Local Partners to Prevent Violent Extremism in the United States” strategy.<sup>227</sup> The fundamental approach of the strategy is based on civic solutions including local outreach and community policing efforts to combat domestic violent extremism. The City of Los Angeles—which has been leading

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<sup>226</sup> Her Majesty’s Treasury, *Prudential Standards in the Financial Services Bill*.

<sup>227</sup> Barack Obama, *Empowering Local Partners to Prevent Violent Extremism in the United States* (Washington, DC: White House, 2011).

efforts in “community policing and engagement with community partners to prevent violence” for more than two decades—built on the White House strategy and developed the “Los Angeles Framework for Countering Violent Extremism” (LA Framework).<sup>228</sup> This chapter examines the LA Framework and provides recommendations to incorporate lessons learned towards using evidence-based policy for countering domestic terrorism.

The original development of the LA Framework does not appear to be based on an evaluation-based methodology. Specifically, the framework did not address how to collect data and measure outcomes. However, follow-on analysis was conducted under the principles of evidence-based policymaking and yielded opportunities to improve the program. Primary lessons learned from the LA Framework include developing better methods to measure the impact of violence prevention and intervention efforts, leveraging existing programs from other disciplines to improve effectiveness, and ensuring that evidence-based efforts minimize bias. The lessons learned and recommendations were developed from several different analysis efforts of the LA framework.

In 2013, Los Angeles organized an Interagency Coordination Group to develop an “intervention program [that] would seek to provide individuals, already deemed to be on a path towards violent extremism, with off-ramps to needed social services, mental health, faith-based and other services.”<sup>229</sup> The City of Los Angeles developed their framework “to address a broad spectrum of extremist ideology that promotes violence and criminal activity.”<sup>230</sup> Moreover, Stevan Weine et al. described the approach as a focus on “getting individuals help to address the behaviors that occur before undertaking violence.”<sup>231</sup> To combat violent extremism, the LA Framework consists of three pillars: prevention, intervention, and interdiction.

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<sup>228</sup> Weine et al., *Leveraging a Targeted Violence Prevention Program*, 5; Los Angeles Interagency Coordination Group, *The Los Angeles Framework for Countering Violent Extremism* (Los Angeles, 2015), <https://www.justice.gov/sites/default/files/usao-cdca/legacy/2015/05/18/MayUpdatedLAFrameworkforCounteringViolentExtremism.pdf>.

<sup>229</sup> Weine et al., *Leveraging a Targeted Violence Prevention Program*, 5.

<sup>230</sup> Los Angeles Interagency Coordination Group, *The Los Angeles Framework for Countering Violent Extremism*, 1.

<sup>231</sup> Weine et al., *Leveraging a Targeted Violence Prevention Program*, 3.

Prevention is defined as collective efforts aimed at closing a range of gaps and social openings by which violent extremist ideologies can find legitimacy. Prevention strategies aim to build healthy, resilient communities where it is more difficult for violent ideologies to take root.<sup>232</sup>

The intervention program would seek to provide individuals, already deemed to be on a path towards violent extremism, with off-ramps to needed social services, mental health, faith-based and other services. The ultimate purpose of “Off-Ramps” will be to provide rehabilitative care to individuals who are moving down a path toward committing illegal activity.<sup>233</sup>

Interdiction efforts (i.e., investigation, arrest, and potential prosecution) are also an important component of the LA Framework for disrupting crimes involving extremist violence and threats to the safety of our communities. The interdiction component is critical to stopping individuals who are intent on committing violence, investigating crimes associated with extremist violence, creating an environment where the public feels safe to go about their daily lives, and serving as a deterrent to those who may aspire to commit acts of violence.<sup>234</sup>

## **2. Countering Violent Extremism and Combating Domestic Terrorism Similarities**

Historically, violent extremists have been treated separately and distinctly from domestic terrorists. However, the underlying approach to countering violence has recently evolved to recognize the similarities. The National Counterterrorism Center defines homegrown violent extremists as “ideologically motivated terrorist activities (including providing support to terrorism) in furtherance of political or social objectives promoted by a foreign terrorist organization...Homegrown violent extremists are distinct from traditional domestic terrorists who engage in unlawful acts of violence to intimidate civilian populations or attempt to influence domestic policy without direction or influence from a foreign actor.”<sup>235</sup> Moreover, the United States’ efforts to combat violent extremism “in the last 10 years has been largely shaped in response to terrorists inspired by foreign

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<sup>232</sup> Weine et al., 3.

<sup>233</sup> Weine et al., 7.

<sup>234</sup> Weine et al., 8.

<sup>235</sup> The National Counterterrorism Center, *U.S. Violent Extremist Mobilization Indicators 2021 Edition* (Washington, DC: The National Counterterrorism Center, 2021), 3, [https://www.dni.gov/files/NCTC/documents/news\\_documents/Mobilization\\_Indicators\\_Booklet\\_2021.pdf](https://www.dni.gov/files/NCTC/documents/news_documents/Mobilization_Indicators_Booklet_2021.pdf).

ideologies.”<sup>236</sup> The federal government’s approach to countering violent extremism began to shift more towards all types of ideologies, including domestic beliefs, during the Obama Administration. The 2011 Strategy noted that efforts must account for “countering the radicalization of all types of potential terrorists” in addition to a focus on violent jihadists.<sup>237</sup> This pivot recognized the similarities between the radicalization of foreign and domestic terrorists and that “the emergence of violent extremist narratives is not bound to a particular ideology or theology, but to the ways in which groups organize their beliefs about the ingroup and its relationship to others.”<sup>238</sup> Even though the LA Framework was designed to counter violent extremism, the underlying approach and lessons learned can be applied to combating domestic terrorism.

Despite the historical focus on ideologies of foreign groups when countering violent extremists, there are similarities when developing programs that address the roots of domestic terrorism. Social identity theory, as one example described by Anders Strindberg, has been proposed as a “way to structure our inquiry into terrorism and violent extremism at both the macro- and microlevels as well as a means of thinking about counter-efforts.”<sup>239</sup> The LA Framework program when viewed through the lens of social identity theory is a useful starting place when addressing domestic terrorism. This approach may also be useful in addressing the challenges of lone-wolf domestic terrorism, because the beliefs espoused by a violent group can be adopted “unbeknownst to the group in question, and for reasons that are entirely [the lone wolf’s] own.”<sup>240</sup> Anders Strindberg describes that the use of understanding ingroup beliefs “has gained ground with law enforcement analysts dealing with terrorism, violent extremism, and other violent sub-state actors due to its

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<sup>236</sup> Jerome P. Bjelopera, *The Domestic Terrorist Threat: Background and Issues for Congress*, CRS Report No. R42536 (Washington, DC: Congressional Research Service, 2013), 8.

<sup>237</sup> Bjelopera, 64.

<sup>238</sup> Anders Strindberg, *Social Identity Theory and the Study of Terrorism and Violent Extremism* (Stockholm: Swedish Defence Research Agency, 2020), 29, <https://www.foi.se/rest-api/report/FOI-R--5062--SE>.

<sup>239</sup> Strindberg, 60.

<sup>240</sup> Strindberg, 41.

ability to accurately forecast actions and reactions.”<sup>241</sup> A social identity theory perspective, “is able to give us insight into the mechanisms of the radicalization process, as well as the necessary conditions for successful counter- and de-radicalization.”<sup>242</sup> Therefore, the lessons learned from the LA Framework may be useful when implementing the *National Strategy for Countering Domestic Terrorism*.

### **3. Analysis of the LA Framework**

#### **a. Background**

The LA Framework was selected by the Department of Homeland Security as a pilot program to “identify promising practices that will inform and inspire community-led efforts throughout the nation.”<sup>243</sup> Under the evidence-based policy rubric, it has undergone several reviews and assessments, including a formative study and a process evaluation. An assessment of the LA Framework points out that the formulation of the program was missing significant elements of a data-based evaluation process. Nevertheless, these reports provide the opportunity to incorporate expert opinion and analysis towards recommendations for future implementation efforts that are based on evidence theory.

#### **b. Formative Study**

In 2015, under a grant from the Department of Homeland Security, a team of health professionals conducted a formative study of the LA Framework “to understand, plan, and assess its programs to address all forms of violent extremism.”<sup>244</sup> A formative study is described as using “qualitative and quantitative methods to provide information for researchers to plan intervention programs.”<sup>245</sup> The formative study conducted on the LA Framework was designed “to obtain detailed information on the activities currently taking

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<sup>241</sup> Strindberg, 24.

<sup>242</sup> Strindberg, 39.

<sup>243</sup> Weine et al., *Leveraging a Targeted Violence Prevention Program*, 5.

<sup>244</sup> Weine et al., 3.

<sup>245</sup> Joel Gittelsohn et al., “Formative Research in School and Community-Based Health Programs and Studies: ‘State of the Art’ and the TAAG Approach,” *Health Education & Behavior* 33, no. 1 (February 2006): 25, <https://doi.org/10.1177/1090198105282412>.

place in Los Angeles, including available resources and outcomes of interest, so as to develop an evaluable program focused on a feasible set of program goals and activities.”<sup>246</sup> For the purposes of alignment with the OMB guidance on the components of evidence in Chapter II, the formative study will be categorized as foundational fact finding (i.e. “descriptions and documentation of interventions, services, programs, or policies currently being implemented in the field”) as described in the text supporting Figure 3.<sup>247</sup>

The formative study reviewed the LA Framework through the perspective that addressing violent extremism should be treated as a public health issue and specifically on the prevention aspects of public health programs. Prevention is a primary pillar in the *National Strategy for Countering Domestic Terrorism* with the specific goal to “strengthen domestic terrorism prevention resources and services.”<sup>248</sup> Additionally, the National Strategy for Combating Domestic Terrorism notes that domestic terror prevention efforts should incorporate the “best practices in public health–focused violence prevention.”<sup>249</sup> The formative study describes the different deterrence measures applied to violent extremism as “primary, secondary and tertiary levels of prevention.”<sup>250</sup> (Figure 4)

Primary prevention targets the whole community, the vast majority of whom do not have problematic behaviors associated with violent extremism, through activities such as community-wide messaging campaigns that aim to shift cultural norms while strengthening the bond between individuals and communities.<sup>251</sup>

Secondary prevention [measures are] intended for persons who have been identified with behaviors or communications that signal they are at risk of committing violence but have not yet committed a violent act.<sup>252</sup>

Finally, tertiary prevention in public health is aimed at persons with demonstrated violent behavior. [Countering violent extremism] tertiary

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<sup>246</sup> Weine et al., *Leveraging a Targeted Violence Prevention Program*, 11.

<sup>247</sup> Office of Planning, Research & Evaluation, *The Administration for Children & Families*, 2.

<sup>248</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*, 19.

<sup>249</sup> National Security Council, 20.

<sup>250</sup> Weine et al., *Leveraging a Targeted Violence Prevention Program*, 8.

<sup>251</sup> Weine et al., 8.

<sup>252</sup> Weine et al., 8.



prevention is directed at managing and rehabilitating persons who have manifested criminal, violent extremist behaviors.<sup>253</sup>

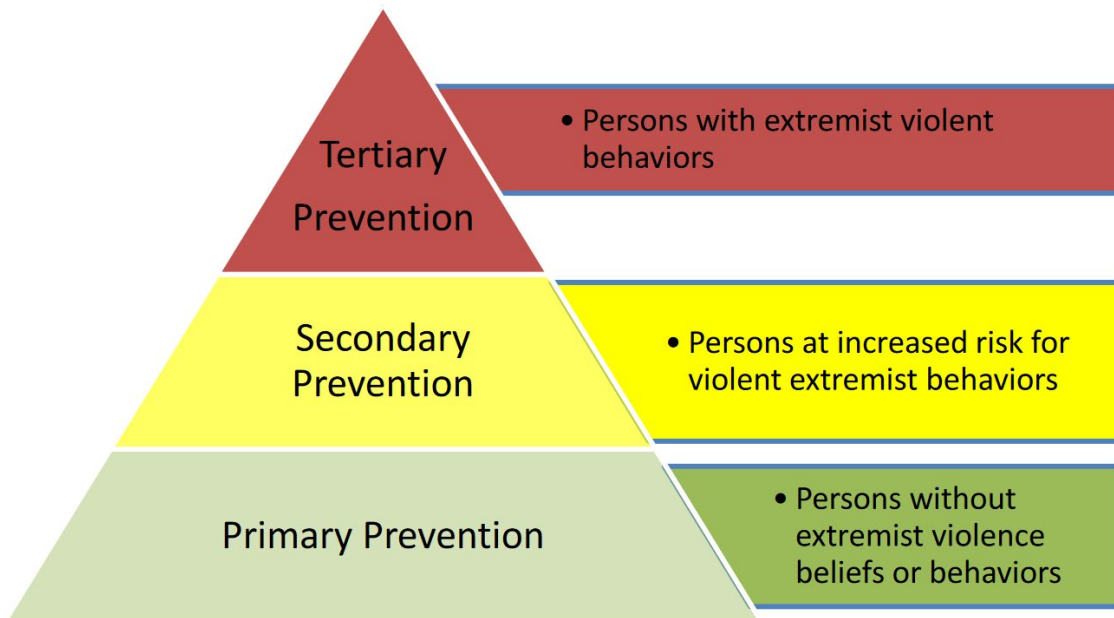


Figure 4 Three-Tiered Model for Prevention of Violent Extremism<sup>254</sup>

The formative study—in alignment with evidence-based methods to conduct evaluation through a robust methodology that includes measurement of results—was conducted to ensure “that the [LA Framework] is well-developed and reaches its intended target audience ... and intended outcomes are feasible.”<sup>255</sup> The study identified that there was a lack of secondary prevention measures in the LA Framework. To address these gaps, the steering committee in the research group decided to leverage the already existing prevention program in Los Angeles identified as the School Threat Assessment Response Team. Stevan Weine et al. described the School Threat Assessment program as evaluation-based with a demonstrated high success rate that implements “health interventions that

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<sup>253</sup> Weine et al., 9.

<sup>254</sup> Weine et al., 8.

<sup>255</sup> Weine et al., 10.

address the needs of individuals engaged in, or at risk for, acts of targeted violence in school settings countywide.”<sup>256</sup>

Based on the School Threat model, the formative study proposed a logic model that would meet the needs of an evidence-based approach for countering violence. In support of using a model like the School Threat Assessment Response Team,<sup>257</sup> there is “an existing resource called *Getting to Outcomes*, an evidence-based approach to evaluation that has been used to aid many community-based organizations in the public health sphere in assessing their own programs.”<sup>258</sup> This approach is analogous to the recommendations in the formative study with the first step to “identify your program’s components, and build a logic model.”<sup>259</sup> A similar approach can be applied when countering domestic terrorism and by developing logic models in support of the national strategy.

### **c. Process Evaluation**

Following the formative study, a process evaluation was conducted on the LA Framework by the National Consortium for the Study of Terrorism and Responses to Terrorism. “A process evaluation examines the course and context of a program so as to understand what is happening, to identify best practices, and to understand the program in its broader context.”<sup>260</sup> The CDC states that “process evaluation determines whether

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<sup>256</sup> Stevan Weine et al., *Evaluation of a Targeted Violence Prevention Program* (Washington, DC: Department of Homeland Security, 2021), 2, <https://www.dhs.gov/publication/evaluation-targeted-violence-prevention-program>; Weine et al., *Leveraging a Targeted Violence Prevention Program*, 17.

<sup>257</sup> NOTE: While this School Threat Assessment Response Team has received accolades from several organizations, the author cannot find any studies that indicate that the program has undergone any form of evidence-based evaluation.

<sup>258</sup> Justin Snair, Claire Giammaria, and Anna Nicholson, eds., *Countering Violent Extremism through Public Health Practice: Proceedings of a Workshop* (Washington, DC: National Academies Press, 2017), 79, <https://doi.org/10.17226/24638>.

<sup>259</sup> Snair, Giammaria, and Nicholson, 79.

<sup>260</sup> Stevan Weine, Ahmed Younis, and Chloe Polutnik, *Community Policing to Counter Violent Extremism: A Process Evaluation in Los Angeles* (College Park, MD: National Consortium for the Study of Terrorism and Responses to Terrorism, 2017), 1, <https://www.start.umd.edu/publication/community-policing-counter-violent-extremism-process-evaluation-los-angeles>.

program activities have been implemented as intended and resulted in certain outputs.”<sup>261</sup> For example, process evaluations have been validated in medical intervention trials addressing hypertension in low and middle-income countries, victim protection programs, and tobacco prevention programs.<sup>262</sup> For the purposes of alignment with the OMB guidance on the components of evidence, the process evaluation will be categorized as performance measurement (i.e. “used to measure progress toward goals” as defined in Figure 3).<sup>263</sup> In this case, the researchers reviewed and compared potential policy options to address the problem of countering violent extremism by conducting field observations and structural interviews to “develop a prevention model, identify core prevention strategies, and plan for assessing community resilience to violent extremism.”<sup>264</sup>

At the time of the process evaluation, the LA Framework was not following robust evidence-based policymaking methods. The outcomes of the program were not being measured and therefore unable to be evaluated. Moreover, the process evaluation report highlighted that the current countering violent extremism program in LA does “not appear to have a prevention model which is solidly based on sound theory.”<sup>265</sup> Proper implementation of evidence-based policymaking procedures at the outset would have identified this shortcoming prior to implementation.

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<sup>261</sup> Centers for Disease Control and Prevention, “Types of Evaluation” (Atlanta: Centers for Disease Control and Prevention, 2012), 1, <https://www.cdc.gov/std/program/pupestd/types%20of%20evaluation.pdf>.

<sup>262</sup> Felix Limbani et al., “Process Evaluation in the Field: Global Learnings from Seven Implementation Research Hypertension Projects in Low-and Middle-Income Countries,” *BMC Public Health* 19, no. 1 (2019): 953, <https://doi.org/10.1186/s12889-019-7261-8>; Jo Ann Intili et al., *An Evaluation Framework for USAID-Funded TIP Prevention and Victim Protection Programs* (Washington, DC: US Agency for International Development, 2009), <https://childhub.org/en/child-protection-online-library/evaluation-framework-usaid-funded-tip-prevention-and-victim>; and Matthew McKenna, *Introduction to Process Evaluation in Tobacco Use Prevention and Control* (Washington, DC: Centers for Disease Control and Prevention, 2008), [https://www.cdc.gov/tobacco/stateandcommunity/tobacco-control/pdfs/tobaccousemanual\\_updated04182008.pdf](https://www.cdc.gov/tobacco/stateandcommunity/tobacco-control/pdfs/tobaccousemanual_updated04182008.pdf).

<sup>263</sup> Young, *Evidence-Based Policymaking*, 25.

<sup>264</sup> Weine, Younis, and Polutnik, *Community Policing to Counter Violent Extremism*, 5.

<sup>265</sup> Weine, Younis, and Polutnik, 27.

**d. Challenges of the LA Framework and Other Approaches to Countering Violent Extremism**

As discussed in Chapter II, poor implementation of evidence-based programs can result in results that are skewed or biased by incorporating faulty or incomplete data sets. In the case of countering violent extremism, the Council on American-Islamic Relations, an Islamic civil liberties group, noted that these programs typically focus only on Muslim communities. The group states “that the government [should] stop investing in countering violent extremism programs that will only stigmatize and marginalize our communities.”<sup>266</sup> The group recommends that any efforts to counter violent extremism should “simply target violent activity generally, regardless of its ideological origins” and move away from using religion as a basis for law enforcement engagement.<sup>267</sup> This approach to profiling is outlined specifically in the LA Framework which focused on “partnerships with American-Muslim communities because these communities are leading efforts to develop some of the most innovative prevention and intervention programs in the region.”<sup>268</sup> The Brennan Center for Justice further highlights that “strategies for countering violent extremism can erode democratic principles and social cohesion, increase radicalization and incite conflict and violence.”<sup>269</sup> and “all serious empirical studies — including those funded by the U.S. government — have concluded there is no typical trajectory that a person follows to become a terrorist.”<sup>270</sup> Current countering violent extremism programs “have resulted in profiling, discrimination, and resentment in the individuals they were meant to help, and, sometimes, programs have been shown to increase an individual’s sense of isolation and inspire violent behavior.”<sup>271</sup> Focusing on

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<sup>266</sup> Ojaala Ahmad, “L.A. Based Organizations’ Statement on Federal Government’s CVE Programs,” CAIR Los Angeles, accessed May 18, 2022, <https://ca.cair.com/losangeles/updates/l-a-based-organizations-statement-on-federal-governments-countering-violent-extremism-programs/>.

<sup>267</sup> Ahmad.

<sup>268</sup> Weine et al., *Leveraging a Targeted Violence Prevention Program*, 1.

<sup>269</sup> Faiza Patel and Michael German, “Fact Sheet: Countering Violent Extremism: Myths and Facts” (New York: Brennan Center for Justice, November 2, 2015), 1, <https://www.brennancenter.org/our-work/research-reports/fact-sheet-countering-violent-extremism-myths-and-facts>.

<sup>270</sup> Patel and German, 1.

<sup>271</sup> Snair, Giammaria, and Nicholson, *Countering Violent Extremism*, 44.

just American-Muslim (or any specific) communities creates an inherent bias in the data for evidence-based purposes while also potentially creating outcomes that are not desirable. While countering violent extremism is typically considered to be influenced by foreign ideologies, the bias becomes inherent when focusing on specific groups. This approach can also create bias in domestic terrorism programs and create gaps in data if not implemented appropriately.

Another challenge with counter-violent extremism programs is the lack of available data. Similar to domestic terrorism, there is “lack of a clear, agreed- upon definition for violent extremism and of clear outcomes” being measured.<sup>272</sup> Additionally, it is difficult to define metrics that demonstrate successful prevention programs because researchers are unable “measure and demonstrate the counterfactual—the number of extremist acts the program had prevented.”<sup>273</sup> Moreover, there is “limited evidence regarding the risk factors for violent extremism” and “the best outcomes might not be the easiest to measure, leading to a false sense of security because measured outcomes are looking good, while unmeasured (but more important) outcomes might be poor.”<sup>274</sup> In fact, “research studies of community policing have shown that it can improve citizens’ satisfaction with and trust in the police, but it does not necessarily decrease crime” which is a major component of the purpose of the LA Framework.<sup>275</sup>

Evidence-based programs designed for expediency rather than outcome measurement can lead to policy-based evidence. In the case of countering violent extremism, this can result in programs where “the body of relevant research has been ignored because it does not provide the answers that practitioners are seeking: How to establish the profile of a violent extremist; how to predict violent extremism, and how to define the preterrorist state.”<sup>276</sup> Experts in the field note that “public health [officials] begin working toward prevention immediately when a crisis emerges, even before the

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<sup>272</sup> Snair, Giammaria, and Nicholson, 82.

<sup>273</sup> Snair, Giammaria, and Nicholson, 80.

<sup>274</sup> Snair, Giammaria, and Nicholson, 83, 59.

<sup>275</sup> Weine, Younis, and Polutnik, *Community Policing to Counter Violent Extremism*, 1.

<sup>276</sup> Snair, Giammaria, and Nicholson, *Countering Violent Extremism*, 47.

mechanisms that underlie the outcomes are fully understood.”<sup>277</sup> This is coupled with the fact that “little is known about the actual efficacy of the countering violent extremism interventions.”<sup>278</sup> One expert “reported that despite the strength of efforts in the interdiction pillar, to date those activities have not resulted in a perceptible reduction of threats or of recruitment efforts.”<sup>279</sup> This leads to significant concerns when trying to make evidence-based decisions “because it entails pathologizing characteristics that are not scientifically validated and extend into the realm of political beliefs.”<sup>280</sup>

As discussed previously, the LA Framework “initiatives were not designed to be evaluated and did not conduct any regular program monitoring or evaluation activities.”<sup>281</sup> Moreover, “none of these education and support activities were manualized or evidence-based.”<sup>282</sup> However, experts highlight “that over the years, challenges and lessons learned through activities in Los Angeles have spurred evolution on multiple fronts for approaching these complex issues, such as redefining the core concepts of radicalization and counterradicalization and shifting activities toward the social domain and away from the traditional law enforcement counterterrorism lens.”<sup>283</sup> The formative and process evaluations of the LA Framework provide lessons learned to better implement evidence-based policymaking in future efforts.

#### *e. Lessons Learned*

Reviewing the literature on the LA Framework provides several opportunities to take lessons learned from the countering violent extremism work and apply them to evidence-based policymaking in the domestic counterterrorism domain. Primary examples that can be applied from the LA Framework include: 1) developing better methods to

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<sup>277</sup> Snair, Giammaria, and Nicholson, 78.

<sup>278</sup> Snair, Giammaria, and Nicholson, 78.

<sup>279</sup> Snair, Giammaria, and Nicholson, 36.

<sup>280</sup> Snair, Giammaria, and Nicholson, 47.

<sup>281</sup> Weine et al., *Leveraging a Targeted Violence Prevention Program*, 16.

<sup>282</sup> Weine et al., 15.

<sup>283</sup> Snair, Giammaria, and Nicholson, *Countering Violent Extremism*, 34.

measure the impact of violence prevention and intervention efforts, 2) leveraging existing programs from other disciplines to improve effectiveness, and 3) ensuring that evidence-based efforts minimize bias.

(1) Metrics

The LA framework has been criticized for not measuring the impact of its community policing and other outreach efforts. Specifically, the framework has a “lack of adequate understanding and evidence about how exactly community policing practices can [strengthen the capacities of communities to prevent violent radicalization and to stop attacks].”<sup>284</sup> This criticism of countering violent extremism is not restricted to efforts by the city of Los Angeles. A consortium of experts conducted a tabletop exercise to evaluate how community policing efforts would be implemented to counter violent extremism. Participants noted that “the exercise was very successful in exposing the complexity of developing effective and appropriate interventions in this precriminal space.”<sup>285</sup> Additionally, the U.S. Government Accountability Office (GAO) conducted a study of countering violent extremism efforts and found that there was no “process for measuring the overall effort. Furthermore, the report went on to note that “it was not able to determine if the United States is better off today than it was in 2011 ... because no cohesive strategy with measurable outcomes has been established to guide the multi-agency effort.”<sup>286</sup> While not constrained to the LA Framework, these reports highlight a consistent problem with metrics that should be corrected in future combating domestic terrorism programs.

The Evidence Act requires that federal agencies are able to measure consequences when implementing policies. To fulfill the standards outlined in the Evidence Act, the GAO states any countering violent extremism efforts must incorporate “a cohesive strategy that includes measurable outcomes.”<sup>287</sup> Moreover, the GAO establishes that without

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<sup>284</sup> Weine, Younis, and Polutnik, *Community Policing to Counter Violent Extremism*, 1.

<sup>285</sup> Snair, Giammaria, and Nicholson, *Countering Violent Extremism*, 37.

<sup>286</sup> Diana Maurer, *Countering Violent Extremism: Actions Needed to Define Strategy and Assess Progress of Federal Efforts*, GAO-17-300 (Washington, DC: Government Accountability Office, 2017), 16, <https://www.gao.gov/assets/gao-17-300.pdf>.

<sup>287</sup> Maurer, 17.

coordinated effort across the federal government, agencies will continue to be “left to develop and take their own individual actions without a clear understanding of whether and to what extent their actions will reduce violent extremism in the United States.”<sup>288</sup>

The GAO recommended that counter-violence programs should “1. Develop a cohesive strategy that includes measurable outcomes for CVE activities; and 2. Establish and implement a process to assess overall progress in CVE, including its effectiveness.”<sup>289</sup> The development of metrics, a cohesive approach, and an impact evaluation, or in OMB language—performance measurement (Figure 3)—is “critically important to scientifically assess and evaluate” how the government addresses the challenging issue of countering violent extremism.<sup>290</sup>

## (2) Leverage Existing Programs

Measuring the impacts of preventive programs, like countering violent extremism and combating domestic terrorism, is challenging. When developing and implementing evaluation-based programs, it may be useful to leverage programs from other disciplines that have been successful. Both the formative study and the process evaluation examined the use of the public health model as a method of treating violent extremism through preventive measures centered around community involvement. Both studies recommended that “additional work should include incorporating public health models of prevention and building resilience that rely on evidence-based strategies for addressing upstream risk factors and root causes.”<sup>291</sup> Experts highlight that violence prevention measures should include “CDC’s four key steps for implementing a public health.” and also urged practitioners to devise a paradigm for approaching countering violent extremism more holistically” in alignment with other evidence-based programs.<sup>292</sup> The White House also highlighted that domestic terrorism measures should be “grounded in existing evidence and

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<sup>288</sup> Maurer, 17.

<sup>289</sup> Maurer, 21.

<sup>290</sup> Snair, Giammaria, and Nicholson, *Countering Violent Extremism*, 78.

<sup>291</sup> Weine, Younis, and Polutnik, *Community Policing to Counter Violent Extremism*, 2.

<sup>292</sup> Maurer, *Countering Violent Extremism*, 17.



best practices in public health–focused violence prevention.”<sup>293</sup> Due to the lack of proven intervention programs in violence reduction, it may be helpful to adapt proven evidence-based programs when implementing domestic counterterrorism measures.

### (3) Minimize Bias

As discussed in Chapter II, robust evaluation must address factors of bias and mitigate those factors as much as possible. Traditionally, there has been inherent bias or discrimination when implementing policies that involve countering violent extremism. Profiling and focusing on specific neighborhoods has a deleterious impact on the communities where prevention is supposed to be occurring. “If discrimination is one of the drivers of violence, then declaring someone or some communities to be precriminal could have the counterintuitive effect of increasing their risk of committing criminal acts.”<sup>294</sup> The impacts of bias, as described in the evidence-based pyramid in Figure 1, are critical in understanding and correcting for this type of discrimination. Policies that address violent extremism or domestic terrorism should include larger sample sizes, or other control measures, to account for the impacts of bias when conducting evaluation. For example, “no such program should disproportionately target any particular community, since that would be both counterintuitive and counterproductive.”<sup>295</sup> The GAO supported this broader-based approach when it criticized the federal government’s 2016 Strategic Implementation plan noting that “research conducted in partnership with one such program that provides pathways out of violent extremism, [but] does not include any information on how the federal government will identify other groups.”<sup>296</sup> Not addressing the potential impacts of bias will leave gaps in programs designed to mitigate domestic terrorism.

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<sup>293</sup> National Security Council, *National Strategy for Countering Domestic Terrorism*, 20.

<sup>294</sup> Snair, Giammaria, and Nicholson, *Countering Violent Extremism*, 46.

<sup>295</sup> Snair, Giammaria, and Nicholson, 46.

<sup>296</sup> Maurer, *Countering Violent Extremism*, 16.

Table 6. Lessons Learned from the LA Framework

- Develop a common methodology to appropriately measure the impact of violence prevention and intervention efforts.
- Review and leverage existing evaluation-based social science interventions from other agencies and disciplines to improve effectiveness.
- Strive to avoid bias through effective evaluation design and robust data sets.

## V. CONCLUSION AND RECOMMENDATIONS FOR APPLYING EVIDENCE-BASED POLICYMAKING TO DOMESTIC TERRORISM

The United States has committed to using evidence when developing policies as outlined in both the Evidence Act and the *National Strategy for Countering Domestic Terrorism*. However, domestic counterterrorism programs that incorporate data and evaluation in their analysis and results are rare. While the U.S. is just beginning its standardization of evidence-based policymaking across the nation, there remains very generalized guidance from OMB on how to develop procedures that are statistically accurate and support the rigors of evaluation. The lessons learned as described in this thesis will be reviewed in this chapter to provide recommendations for creating the foundations for building a data-driven system that uses evaluation systemically in efforts to protect the nation against domestic terrorism.

Case studies surrounding how evidence-based policymaking has been performed in other aspects of the social sciences have created the opportunity to implement lessons learned in the field of countering domestic terrorism. While this thesis did not specifically evaluate how to counter domestic terrorism (that is best left to another thesis), it investigated the components that will be useful for agencies, specifically the Department of Homeland Security and the Department of Justice, in creating the foundations for building a data-driven system that uses evaluation systemically in efforts to protect the nation.

OMB's guidance "depicts and describes four interdependent components of evidence: foundational fact-finding, policy analysis, program evaluation, and performance measurement. Each of these components informs and directs the others, and many evidence-building activities may be hard to categorize because they organically include more than one component."<sup>297</sup> OMB recommended that agencies consider these types of evidence in their activities but did not explicitly define the four categories of evidence-

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<sup>297</sup> Vought, *Phase 1 Implementation of the Foundations*, 13.

based policy in Figure 3. While OMB helped clarify the process in 2021, there isn't a single definitive source for the process of evidence-based policymaking.<sup>298</sup> The lessons learned in the case studies are evaluated under OMB's four components of evidence as well as the more explicit steps outlined in Table 7 (summarized from Chapter II without the supporting sources). The recommendations are discussed in the following sections and incorporated into Table 8.

Table 7. Summary of Key Components of Implementing OMB's Four Phases

<b>OMB Guidance</b>	<b>Key Components</b>
Foundational Fact Finding	Define the Problem
	Standardize the Data
	Inventory Programs
Policy Analysis	Classify Programs
	Conduct Comparisons
Performance Measurement	Develop Meaningful Metrics
	Capture Relevant Information
	Establish the Evaluation Design
Program Evaluation	Assess Evidence
	Report Results
	Centralize Results

The Office of Management and Budget has created the beginnings of an agency-driven evidence-based policymaking culture by requiring that federal officials develop Learning Agendas that define the problems they are attempting to solve. As the first step in foundational fact finding, defining the problem, is arguably the most important step. In an effort to assist agencies that may be struggling with this new paradigm—as outlined during the UK Crime Reduction Program case study—the government should consider funding private centers of excellence that can support the development and execution of agency-driven initiatives in an evidence-based approach. Not only will this help define the problem at the outset, but it will also ensure consistent methodologies in the application of programs, and support multiple levels of OMB's four components of evidence.

<sup>298</sup> Young, *Evidence-Based Policymaking*.

A key component of evidence-based policymaking is the use of data when formulating decisions on programs. While this may be self-evident, there were several instances in the case studies where standardized data was not incorporated at the outset of the program. The Cardiff model, for example, when implemented in hospitals in the United States had difficulty in sharing information due to proprietary and disparate healthcare systems used across the region. The UK case study also demonstrated challenges with unreliable data because the implementation of several programs resulted in not understanding the criticality of data collection and “the problem nationally did not come to light until at least a year into the Crime Reduction Program. In many cases, too, it was too late to rescue the situation in terms of producing the necessary quality and quantity of data.”<sup>299</sup> The lack of standard data collection methods used in domestic terrorism are faced with these same challenges. As described previously, “domestic [terrorism] incident datasets have been virtually unavailable.”<sup>300</sup> resulting in a lack of data for effective research and evaluation on domestic counterterrorism methods. Moreover, in a discussion on domestic terrorism, Seth Jones notes that the “U.S. government does not publicly release comprehensive data on terrorist attacks and plots, the characteristics of perpetrators, and other factors like tactics and targets. Data analysis could offer an objective mechanism for apportioning counterterrorism resources and efforts relative to actual threats.”<sup>301</sup> Additionally, a key lesson learned during the LA Framework case study noted that researchers should “learn how to use data appropriately, without segmenting and targeting specific populations.”<sup>302</sup> Much like violent crime, the United States needs to look at how information for domestic terrorism incidents is collected—and standardize the data across all jurisdictions—to improve evaluation and evidence-based policymaking.

As part of foundational fact-finding, agencies should inventory programs that could be implemented to address their Learning Agenda. This assists the policymakers in

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<sup>299</sup> Maguire, “The Crime Reduction Programme in England and Wales,” 229.

<sup>300</sup> Berkebile, “What Is Domestic Terrorism?,” 1.

<sup>301</sup> Seth G. Jones, “The Evolution of Domestic Terrorism,” Center for Strategic and International Studies, February 17, 2022, <https://www.csis.org/analysis/evolution-domestic-terrorism>.

<sup>302</sup> Snair, Giammaria, and Nicholson, *Countering Violent Extremism*, 100.

understanding what programs have already been implemented on the topic. The Pew-MacArthur foundation, for example, recommends that governments “develop an inventory of funded programs.”<sup>303</sup> Following the inventory, practitioners should then classify the programs to determine the best viability of success before conducting implementation efforts. The General Services Administration provides some guidance that lists four specific criteria for developing successful Learning Agendas which include being useful, focused, feasible, and inclusive.<sup>304</sup> The CDC further helps inform this step by stating that “policy analysis is the process of identifying potential policy options that could address your problem and then comparing those options to choose the most effective, efficient, and feasible one.”<sup>305</sup> The Cardiff Model in Philadelphia, for example, failed due to the challenges of sharing information between hospitals and law enforcement. The legalities in Philadelphia removed the feasibility of conducting that program at that time. This could have been identified earlier if robust policy analysis had been completed before funding the program. The development of a common framework and guidelines will be useful in establishing evidence-based policymaking methodologies for agencies. The ambitious UK Crime Reduction Program also “suffered from major practical problems caused by unfeasible timescales, slow-moving bureaucratic procedures, and shortages of capacity.”<sup>306</sup> Finally, the formative study conducted on the LA Framework was designed “to obtain detailed information on the activities currently taking place in Los Angeles, including available resources and outcomes of interest, so as to develop an evaluable program focused on a feasible set of program goals and activities.”<sup>307</sup> Understanding what programs are available and classifying those programs for feasibility and other criteria is a necessary part of successful evidence-based programs.

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<sup>303</sup> Urahn and Caudell-Feagan, *Evidence-Based Policymaking*, 20.

<sup>304</sup> General Services Administration, *Evidence Act Toolkit—A Guide to Developing Your Agency’s Learning Agenda* (Washington, DC: General Services Administration Office of Evaluation Sciences, 2020), [https://oes.gsa.gov/assets/toolkits/A\\_Guide\\_to\\_Developing\\_your\\_Agency's\\_Learning\\_Agenda.pdf](https://oes.gsa.gov/assets/toolkits/A_Guide_to_Developing_your_Agency's_Learning_Agenda.pdf).

<sup>305</sup> Centers for Disease Control and Prevention, “Policy Analysis.”

<sup>306</sup> Maguire, “The Crime Reduction Programme in England and Wales,” 213.

<sup>307</sup> Weine et al., *Leveraging a Targeted Violence Prevention Program*, 11.

The White House strategy specifically highlights that health-based models should be incorporated into the approach to countering domestic terrorism. This aligns well with OMB's guidance for policy analysis and conducting comparisons. As noted in the LA Framework formative study, using best practices are helpful in “jumpstarting secondary prevention initiatives through engaging mental health and other community partners, building trust between stakeholders, and identifying capacities and gaps that need to be addressed to ensure successful implementation.”<sup>308</sup> Another key reason to use a public health approach is that it may be useful in improving participation when countering violence and domestic terrorism. Experts in the field have noted that there is often concern in contacting law enforcement and that “integrating a public health approach in developing countering violent extremism related programs help destigmatize the issue of wanting or needing to seek help.”<sup>309</sup> Lessons learned highlighted that leveraging existing evaluation-based social science interventions, like in the healthcare industry, provides a foundation to develop robust programs.

A consistent theme in evidence-based policymaking is to establish methodologies at the outset that can measure performance appropriately. To appropriately do this and establish rigor in any evaluation process, it is critical that programs develop meaningful metrics and capture relevant information. All of the case studies provide good examples of success or failure when conducting this step. For example, an analysis of the Los Angeles Framework highlighted that there was not a robust approach to determining its effectiveness in countering radicalization or violent behavior when it was initiated. The Department of Justice recommended to the city of Los Angeles in 2015 that they should focus on “developing better methodologies for effectively measuring the impact of countering violent extremism outreach, engagement methods, and initiatives.”<sup>310</sup> On the other hand, the Cardiff Model when implemented in the Milwaukee area was very focused on capturing the correct data and applying meaningful metrics that could be used toward

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<sup>308</sup> Weine et al., 4.

<sup>309</sup> Snair, Giammaria, and Nicholson, *Countering Violent Extremism*, 55.

<sup>310</sup> Los Angeles Interagency Coordination Group, *The Los Angeles Framework for Countering Violent Extremism*, 10.

measuring progress, ultimately resulting in an effective program. The UK Crime Reduction Program, however, “began a clear shift away from the need for good research evidence about ‘what works’, towards an emphasis on delivering crime reduction outcomes as soon as possible.”<sup>311</sup> This resulted in poorly evaluated performance that did not follow an established methodology.

Another key component of measuring performance is to establish the evaluation design so that the methodology continues to measure progress as well as reduce the risk of bias “associated with the adoption of inappropriate methods or selective reporting of findings.”<sup>312</sup> In England, for example, the Cardiff Model inadvertently shifted its goals towards information sharing instead of reducing violence. While information sharing is important, it was not the desired end goal of the program. This lesson learned highlights that the methodology must remain focused on the goals of the program to be effective. Evaluators must ensure that the methodology is closely followed and continues to build metrics that support the experiment. While deliberate changes may enrich the evaluation, any inadvertent changes that move away from building evidence that addresses the problem trying to be solved should be corrected. Additionally, the LA Framework program concentrated its efforts on Muslim-Americans, which inherently reduced the size and diversity of the data set during the evaluation—ultimately leading to a biased program that did not include other cultures. Domestic terrorists are not contained to a single ideology or motivation, but incorporate a wide-ranging set of actors with multiple dogmas. Evidence-based programs, specifically those that are addressing domestic terrorism, should strive to avoid bias through effective evaluation design. For example, in the LA Framework, “instead of limiting the focus to Muslim Americans, these strategies should address the full spectrum of ideologically inspired Islamists, far-right, and far-left violence as well as non-ideologically inspired violence.”<sup>313</sup> A biased emphasis “comes at the expense of exploring the other critical dimensions.”<sup>314</sup> As noted in Chapter II (Figure 1), striving toward robust

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<sup>311</sup> Maguire, “The Crime Reduction Programme in England and Wales,” 224.

<sup>312</sup> Young, *Evidence-Based Policymaking*, 5.

<sup>313</sup> Weine, Younis, and Polutnik, *Community Policing to Counter Violent Extremism*, 28.

<sup>314</sup> Snair, Giammaria, and Nicholson, *Countering Violent Extremism*, 47.



evaluation programs will reduce bias and improve the understanding of the impacts of programs.

Effective program evaluation requires that evidence be assessed credibly and objectively. A significant problem in evidence-based policymaking for democratic governments is the strong desire to achieve results quickly to demonstrate progress to voters as demonstrated in the UK Crime Reduction Program. The United States should incorporate methods to mitigate this breakdown in the process. One method may be the development of a Congressionally mandated bipartisan office that appoints members separately from the Executive Branch. This approach may reduce partisanship during Administration changes to ensure that evidence-based policymaking focuses on making decisions based on data and withstands the ebb and flow of value-based choices. Independent organizations like the Bipartisan Policy Center already exist that may help develop a federally mandated office that moderates shifting opinions on politically charged issues.<sup>315</sup> Moreover, agencies should consider using public health experts when evaluating countering domestic terrorism programs. For example, “USAID switched to a policy of using independent agencies to perform their measures of effectiveness.”<sup>316</sup> This approach provides the added advantage of incorporating lessons learned from the public health system when evaluating data and programs associated with violent behavior.

Sustainment of evidence-based initiatives requires that programs report results during and after the program. This allows for others to incorporate or scale the programs accordingly and strengthens accountability for what works across a larger enterprise. The Cardiff Model case study highlighted that success relied on having trained data analysts who can review, compile and communicate the data effectively to other community members. The UK case study also demonstrated “a general lack of experience” in project managers and staff.<sup>317</sup> This becomes even more important in programs, like countering domestic terrorism, that has multiple stakeholders across a wide variety of agencies.

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<sup>315</sup> Bipartisan Policy Center, “Evidence-Based Policymaking Primer.”

<sup>316</sup> Snair, Giammaria, and Nicholson, *Countering Violent Extremism*, 59.

<sup>317</sup> Maguire, “The Crime Reduction Programme in England and Wales,” 222.

Moreover, these reports should be centralized for ease of access and retrieval. Experts on evidence-based policymaking reinforce the creation of clearinghouses “to help expand the available knowledge base and help governments across the country more effectively direct funding to programs that have demonstrated strong results for residents.”<sup>318</sup>

A consistent factor across all the different components of OMB’s four principles for evidence-based policymaking is the need for more consistent and clear guidelines that provide detailed direction to federal agencies on how to properly apply evaluation in social issues. OMB should consider reviewing and imitating something similar to the UK’s Green Book and Magenta Book, along with other guidelines already developed within the Department of Education, the Department of Health and Human Services, and other agencies that can be applied across the Department of Homeland Security and other federal agencies.<sup>319</sup> Consistent guidance from OMB will improve the United States’ standardization of evidence-based policymaking and improve results for social issues. In addition to developing clear guidelines, the United States should consider funding private organizations that can serve as centers of excellence to help career government employees with developing and executing effective evidence-based initiatives. Several organizations exist, like Pew-MacArthur and Arnold Ventures, who are committed to the evidence-based policymaking process and have provided resources to assist the federal government.<sup>320</sup> Funding these organizations will likely be helpful as the government fully embraces evidence-based policymaking, but may not have the knowledge and experience to appropriately implement new initiatives.

Multiple administrations and bipartisan Congressional action have stipulated that future policy decisions should be informed by evidence. This thesis and case study analysis has provided an opportunity to recognize the progress made toward evidence-based policymaking in the United States and provide recommendations for its implementation in

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<sup>318</sup> Urahn and Caudell-Feagan, *Evidence-Based Policymaking*, 17.

<sup>319</sup> Her Majesty’s Treasury, *The Green Book*; Her Majesty’s Treasury, *Prudential Standards in the Financial Services Bill*.

<sup>320</sup> Dube, “Results First Initiative”; Arnold and Arnold, “About Arnold Ventures.”

the pillars outlined in the *National Strategy for Countering Domestic Terrorism*. Table 8 provides a summary of the recommendations outlined in this chapter.

Table 8. Recommendations Developed from the Case Studies

<b>Components of Evidence</b>	<b>Recommendation</b>
Foundational Fact Finding	The federal government should standardize data collection across all agencies, including federal, state, and local partners associated with countering domestic terrorism. Standardization will assist in transferable data and measuring the performance of policy initiatives.
Policy Analysis	Evidence-based policymaking agencies must establish a common methodology before beginning an intervention. The development of a common framework and guidelines may be useful in establishing consistency across agencies.
	Agencies should conduct an inventory and classify programs for feasibility and other criteria before implementing evidence-based approaches. Agencies should also review and leverage existing evaluation-based social science interventions from other Departments.
Performance Measurement	Program facilitators should ensure that efforts remain focused on the programmatic goals and not inadvertently shift to other metrics.
	All agencies should strive to avoid bias through effective evaluation design and robust data sets.
Program Evaluation	The Federal government can improve evidence-based policymaking efforts by hiring or training a cadre of professional evaluators who can review, compile and communicate the data effectively. The fusion of the data into a useful format is critical in implementing effective prevention and response techniques.
	Establish a bipartisan Congressionally mandated office within the Federal government that minimizes the impacts of changing Administrations and politically-driven decisions. The relatively short tenure of executive-level Administrations within the United States creates competing priorities that impact data-driven decisions. To avoid policy-based evidence, a bipartisan or politically independent organization may provide stability when leadership or the environment changes.
	The federal government should consider the creation of clearinghouses where existing evidence-based policy programs can be easily located and

	shared across other agencies with similar goals. This will also provide opportunities for agencies to mimic successful interventions while avoiding poorly developed methodologies.
All of the Dimensions	Develop a common framework and clear guidelines that provide detailed direction to federal agencies on how to properly apply evaluation in social issues. The United States should consider developing a comprehensive guide like the Magenta Guide used in the United Kingdom. <sup>321</sup>
	Fund private centers of excellence that can support the development and execution of agency-driven initiatives in an evidence-based approach. Until the Federal government can develop the expertise and talent within its agencies, private institutions should be considered for support, including health-based agencies that may have more experience with evaluation practices.

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<sup>321</sup> Her Majesty's Treasury, *Prudential Standards in the Financial Services Bill*.

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