



# Securing the Cities Implementation Plan

Fiscal Year 2022

*November 4, 2022*

Fiscal Year 2022 Report to Congress



**Homeland  
Security**

*Countering Weapons of Mass Destruction*

# Message from the Acting Assistant Secretary

November 4, 2022

I am pleased to present the following report, “Securing the Cities Implementation Plan,” which was prepared by the Countering Weapons of Mass Destruction Office (CWMD).

This report was compiled pursuant to a requirement in the Joint Explanatory Statement, which accompanies the Fiscal Year (FY) 2022 Department of Homeland Security (DHS) Appropriations Act (P.L. 117-103). It discusses the status of in-progress changes being made to the Securing the Cities (STC) implementation plan and a detailed assessment of expenditures.

Pursuant to congressional requirements, this report is being provided to the following Members of Congress:

The Honorable Lucille Roybal-Allard  
Chairwoman, House Appropriations Subcommittee on Homeland Security

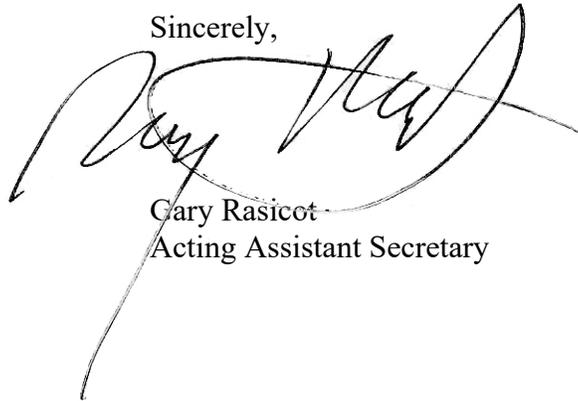
The Honorable Chuck Fleischmann  
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Chris Murphy  
Chair, Senate Appropriations Subcommittee on Homeland Security

The Honorable Shelley Moore Capito  
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

Should you have any questions, please contact the Department's Office of Legislative Affairs at (202) 447-5890.

Sincerely,



Gary Rasicot  
Acting Assistant Secretary



# Executive Summary

Through the STC program, CWMD seeks to detect radiological/nuclear (R/N) materials out of regulatory control, preventing terrorist attacks and other high-consequence events using R/N materials in the United States. In accordance with the Countering Weapons of Mass Destruction Act of 2018, the Secretary of Homeland Security designates eligible jurisdictions from among high-risk urban areas (HRUA) to participate in the STC program.<sup>1</sup> CWMD currently supports 13 STC regions covering 14 HRUAs throughout the United States.

This report fulfills requirements set forth in the Joint Explanatory Statement that accompanies the FY 2022 DHS Appropriations Act (P. L. 117-103). This report focuses on summarizing key updates to the STC implementation plan and STC regional progress reported in the Securing the Cities Program Assessment Report and details expenditures to date.

Per U.S. Government Accountability Office (GAO) recommendations<sup>2</sup>, CWMD began work with the STC regions in November 2021 to collect and report more detailed quarterly expenditures. In accordance with the new information requirement, regions submitted the first expenditure reports for first quarter of FY 2022 in January of 2022. Although the regions have made progress toward achieving one of the key milestones (initial operational capability (IOC)),<sup>3</sup> current expenditure status of the regions corresponds to delays in STC implementation. Implementation was delayed for reasons such as attrition and personnel turnover (both at the regions and the CWMD STC program management office (PMO)), and the re-evaluation of program processes and regional support. In some cases, implementation was impacted further by operational complications of the Coronavirus Disease 2019 pandemic and civil unrest in some major cities. Recently, as the regions and the CWMD STC PMO are returning to normal operations, regional and program expenditures are expected to increase as result of a ramp-up in equipment procurement, training, and sustainment.

The CWMD STC PMO hosted various seminars, program reviews, and senior leader meetings to facilitate and assist regions in their progress through STC implementation phases as they work to establish R/N detection programs. CWMD continues to work with regions on two fronts: (1) to help regions improve submissions of required reports and data to enable more accurate assessments of implementation progress toward successful IOC, followed by full operational capability, and (2) to help improve efficiency in funding execution.

The funding execution by region is often difficult to control or influence because of local procurement and contract regulations and processes. To mitigate this issue, CWMD set up a centralized procurement strategy through the CWMD Systems Support Directorate to procure primary screening equipment. To maintain flexibility, the STC program continues to provide

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<sup>1</sup> 6 U.S.C. § 596b(c)(1).

<sup>2</sup> Report – GAO-19-327, *Combatting Nuclear Terrorism: DHS Should Address Limitations to Its Program to Secure Key Cities* (May 13, 2019).

<sup>3</sup> IOC is established on an individual basis with each region through cooperation between the regional PMOs and the CWMD STC program manager, and centers on the region's ability to detect and report the presence of R/N materials out of regulatory control with an initial set of key partners. This is validated via a tabletop exercise.

direct grant funding to lead agencies of the regions so that they may procure equipment locally when centralized procurement is not compatible with local requirements. This will help to alleviate the burden of local procurement agencies, as well as will help to rework internal timelines and processes to accommodate such delays.



# Securing the Cities Implementation Plan

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# I. Legislative Language

This document was compiled pursuant to direction in the Joint Explanatory Statement that accompanies the Fiscal Year (FY) 2022 Department of Homeland Security (DHS) Appropriations Act (P. L. 117-103), which states:

*Securing the Cities.*—CWMD is directed to provide an updated implementation plan, within 120 days, for the Securing the Cities program that incorporates a detailed assessment on expenditures and their impact on achieving key performance measures and program milestones.

## II. Background

Through the Securing the Cities (STC) program, the Countering Weapons of Mass Destruction Office (CWMD) seeks to detect radiological/nuclear (R/N) materials out of regulatory control, preventing terrorist attacks and other high-consequence events using R/N materials in the United States. The STC program began as a pilot in 2007 with stakeholders in New York City (NYC) and Jersey City/Newark, New Jersey—two distinct high-risk urban areas (HRUA) counted as one STC region. Lessons learned during the pilot program and operations in other regions over the last 15 years helped to refine the program so that CWMD could establish a standard implementation model. Between 2012 and 2017, the program added four other HRUAs: Los Angeles/Long Beach (LA/LB), the National Capital Region (NCR), Houston, and Chicago. These four HRUAs combined with the two HRUAs from the pilot program make up the five legacy STC regions. In 2020, CWMD added 8 new regions, bringing the total number of STC regions to 13, covering 14 HRUAs throughout the United States.

To ensure continued and constructive collaboration among federal, state, and local stakeholders, CWMD pursued noncompetitive cooperative agreements<sup>4</sup> with the 13 STC regions. These agreements provide platforms to institute best practices, to track performance of regional capability development, and to ensure directed support to R/N detection. A cooperative agreement allows CWMD to be involved substantially with providing programmatic and technical subject matter expertise and support as required across these regions.

In coordination with the DHS Office of Procurement Operations, Grants and Financial Assistance Division, CWMD has structured the cooperative agreements to suit best the needs of the state, local, tribal, and territorial (SLTT) partners and to facilitate the development of standardized R/N detection capabilities. CWMD has adopted the Federal Emergency Management Agency's subgrantee model to ensure better coordination with a single principal partner and to gain efficiencies in federal oversight of a single recipient or lead agency within a region. The lead agency is responsible for the local program management through a regional STC program management office (PMO), the coordination between partner agencies, and reporting for the region, which includes metrics pertaining to performance measures according to the STC implementation plan. This single interface provides a streamlined process for partner integration to support successful regional performance.

In June 2021, CWMD submitted to Congress the Implementation Plan for Securing the Cities Program to fulfill the reporting requirement in the Countering Weapons of Mass Destruction Act of 2018 (P.L. 115-387, codified at 6 U.S.C. § 596b). Further, CWMD submitted the Securing the Cities Program Assessment Report in September 2022, a 1-year assessment report following the submission of the implementation plan. The report included the assessment of the STC program's effectiveness based on performance metrics and milestones from the implementation

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<sup>4</sup> Cooperative agreements may be competitive or noncompetitive. A competitive award allows multiple applicants to compete for some or all funds available under a notice of funding opportunity. Competitive awards generally require the federal partner to refrain from assisting applicants with their award submissions. Noncompetitive awards allow STC federal program personnel, with extensive knowledge in building radiation detection capability, to assist the lead agency to apply funds appropriately in the cooperative agreement.

plan, refinement of the detailed assessment approach, and the method that CWMD used in addressing program challenges.

This document draws on information provided in the Securing the Cities Program Assessment Report. It provides a summary of key updates to the STC implementation plan, a detailed assessment on expenditures, and the impact on achieving key performance measures and program milestones.

### III. Update to Implementation Plan

CWMD assesses program performance based on how well each impact measure fits into two broad definitions of success: sufficiency and appropriateness. CWMD assesses STC program performance sufficiency and appropriateness using five impact measures and associated measures of performance (MOP). As stated in the implementation plan for the STC program, “sufficiency” is defined as the measure of the *quantity* of evidence used to support findings and conclusions, which depended on the appropriateness of that data. On the other hand, “appropriateness” is defined as the measure of the *quality* of evidence that encompassed relevance, validity, and reliability used to support findings and conclusions. Based on current methodology for program performance assessment, the five original STC regions that have matured over time have been assessed to be effective. Table 1 below shows the results of this assessment.

**Table 1: Assessment of STC Legacy Regions**

<b>Legacy STC Regions</b>	<b>Impact Measure 1</b>	<b>Impact Measure 2</b>	<b>Impact Measure 3</b>	<b>Impact Measure 4</b>	<b>Impact Measure 5</b>	<b>Overall</b>
<b>NYC/Newark</b>	Yes	Yes	Yes	Yes	Yes	Effective
<b>LA/LB</b>	Yes	Yes	Yes	Yes	Yes	Effective
<b>NCR</b>	Yes	Yes	Yes	Yes	Yes	Effective
<b>Houston</b>	Yes	Yes	Yes	Yes	Yes	Effective
<b>Chicago</b>	Yes	Yes	Yes	Yes	No	Effective*

\*Based on the original assessment methodology, Chicago is assessed as having an “effective” capability.

After recent discussions with the STC Chicago PMO, it was decided jointly that it would benefit the program if Chicago remained in Phase II (Implementation); such status is reflected in Table 4 (STC regional status by phases). Because of the Coronavirus Disease 2019 (COVID-19) pandemic and job attrition, key personnel in the STC lead agency and partner agencies were lost. While the STC Chicago PMO actively is hiring a new STC program manager, this delay will allow the program to reestablish its executive committee and subcommittees, renewing each partner’s commitment.

The assessment approach detailed in the Implementation Plan for Securing the Cities Program was useful for mature legacy regions that are already in Phase IV (Sustainment). However, during interactions with newer regions, CWMD recognizes that simply confirming whether regions are meeting impact measures and MOPs, as outlined in the original assessment methodology, does not offer a complete representation of program effectiveness. As a result, CWMD initiated a revision of the assessment methodology with more details. Two major areas of revision consisted of integration of Homeland Security Exercise and Evaluation Program<sup>5</sup> (HSEEP)-compliant exercises with application of core capabilities from the National

<sup>5</sup> See *HSEEP Guide*, January 2020.

Preparedness Goal and moving the tabletop exercise (TTX) from Phase III (Integration) to Phase II (Implementation).

Integration of HSEEP-compliant exercises enables regions to plan, train, and execute operations to a standardized approach and to enable CWMD to assess using a common standard across all regions. Further, HSEEP methodology integrates after-action reports that help regions to continually improve operational readiness through lessons learned. Additionally, the reason for the change in TTX execution timeline from Phase III to Phase II is to use a TTX to validate initial operational capability (IOC), which is in Phase II. The full-scale exercise (FSE) still is required to be executed in Phase III per the implementation plan to validate full operational capability (FOC).

Validating effectiveness of the STC program relies on accurate, timely, and targeted evidence as each individual region progresses through phases of the implementation plan. CWMD's ability to conduct regional program evaluations and other assessments depends on information reported by regional PMOs during each phase and whether each region's scheduled training and exercises remain on track. Since current data does not address CWMD's evaluation and other assessment needs fully, CWMD is refining assessment methodology to ensure that each regional program is effective, on schedule, and mission-capable.

## IV. Detailed Assessment of Expenditures and Status of STC Regions

### U.S. Government Accountability Office (GAO) Recommendations

In 2019, GAO produced a report<sup>6</sup> that examined three areas: (1) the extent to which DHS tracks STC cities' use of program funds and assesses their performance; (2) what assurance DHS has that cities can sustain capabilities gained through the STC program and challenges that cities face in sustaining such capabilities; and (3) potential changes to the STC program and how DHS plans to implement them, the basis for these changes, and the extent to which DHS communicated with cities about impact of making changes. After reviewing DHS documents, conducting site visits to all cities in the program regions, and interviewing DHS and city officials, GAO provided CWMD with four recommendations, all of which were closed officially as implemented as of November 2021. Below are two of the four recommendations that deal with expenditures and performance and respective CWMD responses, including the actions taken to close them.

**GAO Recommendation 1:** The Assistant Secretary of CWMD should ensure the office regularly collects detailed information from cities on expenditures made using program funds and compares the information to approved purchase plans to ensure these funds were spent as approved, consistent with program goals, and that the expenditures are in keeping with the objectives of the program.

- **CWMD Response:** This recommendation was assessed by GAO as implemented and closed on November 3, 2021. DHS CWMD, in coordination with the DHS Office of the Chief Financial Officer, Financial Assistance Policy and Oversight office and STC Partners, instituted a pre- and post-expenditure review process to ensure expenditures are consistent with purchase plans by utilizing restrictions, award-specific conditions, pre- and post-expenditure review measures, as well as desk audits and site visits to fully address GAO's recommendation.
- **CWMD Continuing Related Efforts:** As of November 30, 2022, regions are required to report quarterly on all applicable budget category spending information to include personnel, fringe benefits, travel, equipment, supplies, contractual, construction, other, and indirect costs. It abides by the policies and the spirit of the cooperative agreement. It allows the program to perform its due diligence regarding expenditure tracking, while minimizing any undue burden to the grantee.

**GAO Recommendation 2:** The Assistant Secretary of CWMD should more fully assess cities' performance by collecting information from cities on achieving key performance metrics and program milestones and enforcing reporting requirements on performance during exercises.

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<sup>6</sup> Report – GAO-19-327, *Combatting Nuclear Terrorism: DHS Should Address Limitations to Its Program to Secure Key Cities* (May 13, 2019).

- CWMD Response:** This recommendation was assessed by GAO as implemented and closed on August 2, 2021. In June 2021, CWMD issued its Securing the Cities Implementation Plan, which lays out key performance metrics, program milestones, and expected deliverables that CWMD will collect from each city in the program. Additionally, CWMD is developing a HSEEP that will be consistent with its Multi-Year Training and Exercise Plan.
- CWMD Continuing Related Efforts:** The STC PMO is ensuring that regions submit quarterly financial reports and quarterly operations reports, which cover key metrics (as referenced in the STC implementation plan submitted to Congress in 2021), and is reworking the assessment criteria/infrastructure for measuring each region’s progress programmatically and technically. The notice of funding opportunities includes timelines (i.e., validation dates) in which significant regional deliverables are due. This drives regional programmatic schedules, while performance is measured through secondary screening proficiency testing, training, and exercise assessments. Currently, CWMD is re-examining the existing assessment criteria and methodology being applied to assess a region’s capability more accurately.

## Expenditures

Per GAO Recommendation 1 above, CWMD started working with STC regions to collect more detailed expenditures. Table 2 depicts the total award that each region received and expended, less FY 2022 funding, at the aggregate level as of March 2022.

**Table 2: Total Awarded and Expended by Region over the Life of the Program as of Q2 FY 2022**

Regions	Total Awarded (\$K)	Total Expended (\$K)	Total Expended (%)
<b>Legacy Awardees</b>			
<b>Chicago</b>	\$ 20,725	\$ 8,554	41%
<b>Houston</b>	\$ 23,612	\$ 14,401	61%
<b>LA/LB</b>	\$ 26,672	\$ 19,867	74%
<b>NCR</b>	\$ 22,350	\$ 15,396	69%
<b>NYC/Newark</b>	\$ 133,757	\$ 125,876	94%
<b>New Awardees</b>			
<b>Atlanta</b>	\$ 4,950	\$ 243	5%
<b>Boston</b>	\$ 3,500	\$ 95	3%
<b>Denver</b>	\$ 5,700	\$ 651	11%
<b>Phoenix (Maricopa Co)</b>	\$ 3,200	\$ 66	2%
<b>Miami</b>	\$ 4,927	\$ 79	2%
<b>NOLA</b>	\$ 3,248	\$ 936	29%
<b>San Francisco</b>	\$ 7,166	\$ 2,893	40%
<b>Seattle</b>	\$ 2,975	\$ 666	22%
<b>Total</b>	\$ 262,782	\$ 189,723	72%

## Detailed Expenditures

To collect detailed expenditures from regions, CWMD modified the cooperative agreement requiring each region to submit a detailed quarterly expenditure report during the first month of the following quarter. This change went into effect at the beginning of the first quarter of FY 2022. Table 3 provides the detailed expenditures of the FY 2020 and FY 2021 awards reflected in the second quarter reports for FY 2022 submitted by STC regions.

**Table 3: Detailed Expenditures of FY 2020 and FY 2021 Awards by Region as of Q2 FY 2022<sup>7</sup> (in thousands of dollars)**

Regions (Dollar Unit in \$K)	Salaries & Wages	Fringe Benefits	Equipment	Supplies	Travel	Other*	Contractual*	Total
Chicago Awarded	\$ 401	\$ 217	\$ -	\$ -	\$ -	\$ 33	\$ -	\$ 650
Chicago Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Houston Awarded	\$ 277	\$ 141	\$ 2,026	\$ 26	\$ 25	\$ 18	\$ -	\$ 2,512
Houston Expenditure	\$ 178	\$ 78	\$ -	\$ -	\$ 2	\$ 0.8	\$ -	\$ 260
LA/LB Awarded	\$ 521	\$ 113	\$ 822	\$ 11	\$ 62	\$ 443	\$ 200	\$ 2,172
LA/LB Expenditure	\$ -	\$ -	\$ 137	\$ -	\$ -	\$ -	\$ -	\$ 137
NCR Awarded	\$ 90	\$ 13	\$ 2,700	\$ -	\$ -	\$ 347	\$ -	\$ 3,150
NCR Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
NYC/Newark Awarded	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 7,982	\$ 2,553	\$ 10,534
NYC/Newark Expenditure	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,654	\$ -	\$ 2,654
Atlanta Awarded	\$ 397	\$ 74	\$ 4,082	\$ 139	\$ 4	\$ -	\$ 254	\$ 4,950
Atlanta Expenditure	\$ 132	\$ 40	\$ 67	\$ 0.3	\$ -	\$ -	\$ 3	\$ 243
Boston Awarded	\$ 130	\$ 14	\$ 2,220	\$ 22	\$ -	\$ -	\$ 1,115	\$ 3,500
Boston Expenditure	\$ 81	\$ 8	\$ -	\$ 6	\$ -	\$ -	\$ -	\$ 95
Denver Awarded	\$ 471	\$ 141	\$ 3,530	\$ 99	\$ 20	\$ 1,339	\$ 100	\$ 5,700
Denver Expenditure	\$ 334	\$ 119	\$ -	\$ 10	\$ 3	\$ 2	\$ 182	\$ 651
Phoenix (Maricopa Co) Awarded	\$ 188	\$ 94	\$ 1,486	\$ 9	\$ -	\$ 1,423	\$ -	\$ 3,200
Phoenix (Maricopa Co) Expenditure	\$ 45	\$ 18	\$ -	\$ 2	\$ -	\$ 1	\$ -	\$ 66
Miami Awarded	\$ 441	\$ 194	\$ 1,340	\$ 233	\$ 239	\$ 688	\$ 1,792	\$ 4,927
Miami Expenditure	\$ 66	\$ 5	\$ 2	\$ 2	\$ 2	\$ 1	\$ -	\$ 79
NOLA Awarded	\$ 266	\$ 84	\$ 1,700	\$ 8	\$ 30	\$ 1,106	\$ 54	\$ 3,248
NOLA Expenditure	\$ 225	\$ 72	\$ 627	\$ 3	\$ 8	\$ -	\$ -	\$ 936
San Francisco Awarded	\$ 706	\$ 247	\$ 2,378	\$ 41	\$ 48	\$ 1,461	\$ 2,284	\$ 7,166
San Francisco Expenditure	\$ 246	\$ 102	\$ 1,388	\$ 12	\$ 0.9	\$ 93	\$ 1,052	\$ 2,893
Seattle Awarded	\$ 1,042	\$ 353	\$ 585	\$ 60	\$ 114	\$ 500	\$ 321	\$ 2,975
Seattle Expenditure	\$ 117	\$ 19	\$ 520	\$ 2	\$ 0.2	\$ -	\$ 7	\$ 666
Total Awarded	\$ 4,929	\$ 1,687	\$ 22,869	\$ 648	\$ 541	\$ 15,338	\$ 8,673	\$ 54,685
Total Expenditures	\$ 1,425	\$ 461	\$ 2,742	\$ 39	\$ 17	\$ 2,752	\$ 1,245	\$ 8,680
Total Remaining	\$ 3,505	\$ 1,225	\$ 20,128	\$ 609	\$ 524	\$ 12,586	\$ 7,429	\$ 46,005

Note: At the time when this report was drafted, CWMD was preparing the release of FY 2022 awards; thus, FY 2022 awards and expenditures are not reflected in the table.

\*See Footnotes for the definitions of the Other<sup>8</sup> and Contractual<sup>9</sup> columns.

<sup>7</sup> Some "Total" values do not reflect the sum of numbers as shown on the table due to rounding to the nearest thousand dollars.

<sup>8</sup> Other – Any other items proposed as direct costs. They provided an itemized list with costs and state the basis for each proposed item (e.g., exercises). Additionally, all backfill and overtime for training is contained in this category.

<sup>9</sup> Contractual – Costs of all contracts for services and goods except for those that belong under other categories such as equipment, supplies, etc. They included third-party evaluation contracts (if applicable) and contracts with secondary recipient organizations.

CWMD deliberately has planned and awarded STC regions with funding in accordance with established process and for each region's specific category of activities as reflected in Table 3. Since FY 2021, the regions' STC implementations were impacted by operational complications created by the COVID-19 pandemic and civil unrest in some major cities. In addition, delays may be attributed to attrition and personnel turnover (both at the regions and CWMD STC PMO), and re-evaluation of program processes and regional support.

While regions' current expenditure status reflects delays in execution, their planned activities, including standing up governance structure, development and submission of plans and requirements documents, procurement and distribution of equipment, and execution of TTX and FSE including planning sessions, remain as required and necessary activities to implement STC programs. Current funding is allocated and expended against these activities as regions progress through the implementation phases. Recently, the CWMD STC PMO has engaged each region to review and refine the plan of action and milestones (POAM), which allows CWMD to plan and track the detailed status of the regions' progress. Table 4 provides 13 STC regions' status with respect to the 5 phases of implementation (see Appendix A: STC Phased Implementation). The table provides a snapshot of progress to date in accordance with the activity progress reports that regions submit along with their detailed quarterly expenditure reports, a CWMD requirement implemented per GAO recommendation, and their respective POAM updates.

**Table 4: STC Regional Status by Phases as of 30 April 2022**

Regions	Phase 0	Phase I	Phase II	Phase III	Phase IV	Status
NYC/ Newark					▲	Reached Sustainment phase in 2020; currently executing equipment recapitalization; planning FSE
LA/LB					▲	Reached Sustainment phase in 2020; currently executing equipment recapitalization; planning for expansion in FY22-23
NCR					▲	Reached Sustainment phase in 2020; currently executing equipment recapitalization; planning for expansion in FY22-23
Houston					▲	Reached Sustainment phase in 2020; currently executing equipment recapitalization; executing expansion in FY22-23; planning FSE
Chicago			▲			Re-establishing Executive Committee and Sub-committees; resetting the program; conducting training; planning for expansion; updating documents
Atlanta		▲				Memoranda of Understanding (MOUs) signed, and Committees formed; developing regional plans and documents; equipment selected and approved to purchase
Denver			▲			Established Committees; MOUs signed; developing regional plans and documents; established equipment requirements; equipment purchase approved
Miami		▲				Establishing Committees; MOUs signed; developing regional plans and documents; working on selecting equipment
San Francisco			▲			Establishing IOC with equipment and training; developing regional plans and documents; exploring expansion
Seattle		▲				Committees formed; MOUs signed; selected equipment; started training; developing regional plans and documents
Boston			▲			Established Committees; MOUs signed; establishing equipment requirements; looking at expansion; developing regional plans and documents
NOLA			▲			Established Committees; MOUs signed; established IOC by leveraging Mardi Gras event; developing regional plans and documents
Phoenix (Maricopa Co)			▲			Established Committees with signed Charters; establishing requirements for program implementation; developing regional plans and documents; starting training

Generally, Table 4 shows three regions in Phase I (Engagement), two regions between Phases I and II (Implementation), four regions including Chicago in Phase II, and four legacy regions in Phase IV (Sustainment). The STC regions in Phase I (Engagement) are in the process of establishing a governance structure with standing committees and the associated charters and MOUs, and for developing regional plans and documents as required per deliverables outlined in the implementation plan.

The STC regions in Phase II (Implementation) are continuing development of plans and documents, and in planning and execution of IOC; the phase culminates with completion of plans and documents, and IOC that is validated via a TTX. Further, regions conduct training and drills and distribute procured equipment during this phase. While the New Orleans, Louisiana (NOLA), Region achieved IOC by leveraging the Mardi Gras event, it still is in Phase II as the region continues to increase and enhance its capability. It also continues to finalize the required documents, to conduct training and drills, and to distribute procured equipment to prepare for FOC. Table 4 depicts the STC regions’ progress in respect to STC implementation phases and notes their key performance in respect to reported deliverables and activities to date. These deliverables and activities are identified in their respective POAMs, and are specified in their cooperative agreement budget justifications for each budget year.

Additionally, as regions and the CWMD STC PMO recently started to return to normal operations, expenditures are expected to increase because of increases in equipment procurement and training as regions work toward FOC.

Efficient funding execution by regions is sometimes difficult to control or influence because of local procurement and contract regulations and processes. To mitigate this issue, CWMD set up a centralized procurement strategy through the CWMD Systems Support Directorate to procure primary screening equipment. To maintain flexibility, the STC program continues to provide direct grant funding to lead agencies of the regions so that they may procure equipment locally when centralized procurement is not compatible with local requirements. Notwithstanding this, CWMD continues to explore other ways to help to improve efficiency to include researching and making other procurement mechanisms available to SLTT partners, as well as by reworking internal timelines and processes to accommodate such delays.

## V. Conclusion

CWMD started implementing changes based on the 2019 GAO recommendations and lessons learned in its policy, program structure, and functions. The STC program continues to refine and establish a nationwide operational R/N detection capability to combat the threat of a high-consequence event, which has the potential to cause widespread destruction. Success of STC programs relies heavily on state, local, and interagency partners. CWMD is working diligently to support and integrate stakeholders better through all the capabilities discussed within this report.

Over the next several years, CWMD will continue to incorporate recommendations and lessons learned. This includes further refinement of financial reporting and tracking methodologies and performance assessment methodologies for STC regions as necessary to support the newer regions. CWMD continues to enhance engagements with the STC regions and stakeholders through various seminars, program reviews, and senior leaders' meetings, facilitating and assisting the regions in the execution of their deliverables and actions as they establish their respective R/N detection programs. These efforts likely will improve efficiency in their implementation, thus increasing their rate of expenditure. CWMD will continue to work with all STC regions to improve their submission of required reports and data to enable more accurate assessment of their progress through the STC implementation phases.

# Appendix A: STC Phased Implementation

## Phased Implementation

The Countering Weapons of Mass Destruction (CWMD) Securing the Cities (STC) program is executed in phases to align the local implementation progress better to program milestones defined within each cooperative agreement. Phasing also signals to each lead agency a graduated approach to capability development resulting in program stability.

### **Phase 0 (Planning and Analysis):**

Phase 0 consists of activities that prepare a high-risk urban area (HRUA) to enter into a cooperative agreement with CWMD. The activities include the development and issuance of the annual notice of funding opportunity (NOFO) for each respective HRUA; initial engagement with federal partners, including the Federal Bureau of Investigation and Department of Energy's National Nuclear Security Administration; and with potential lead agencies to understand the needs. The NOFO for the STC cooperative agreement lists required deliverables, reports, and associated timelines, which are foundational documents required to implement a sustainable radiological/nuclear (R/N) detection capability successfully. The reports are focused operationally and are tied directly to the program and financial metrics. This aids CWMD in monitoring regional performance measures and expenditures on an ongoing basis. The Department of Homeland Security (DHS) Secretary's approval is gained during Phase 0 for any additional regions that meet eligibility requirements. Phase 0 starts approximately 1 year prior to the initial award in Phase I.

### **Phase I (Engagement):**

Phase I begins with the award of a cooperative agreement with an HRUA. The application submitted by the HRUA identifies the proposed lead agency and provides program details to answer the requirements of the NOFO. DHS evaluates the application and awards a cooperative agreement. After the award, CWMD engages with the lead agency and principal partners to define requirements and to build local program structure. This phase is expected to take up to 1 year.

### **Phase II (Implementation):**

Phase II efforts focus on meeting immediate HRUA requirements to establish or enhance initial operational capabilities, which involves procuring equipment, receiving training, utilizing protocols, and sharing information to detect and report the presence of radiological/nuclear materials out of regulatory control. Phase II is expected to take 3 years.

### **Phase III (Integration):**

During Phase III, CWMD expects a region to achieve full operational capability and to demonstrate successfully its ability to integrate into a national detection framework, as defined in National Security Presidential Memorandum-36, "Guidelines for the United States Government Interagency Response to Terrorist Threats or Incidents in the United States and overseas," and the Domestic Detection Concept of Operations. Successful completion of a full-scale exercise (FSE) and compliance with all DHS reporting requirements will be the criteria for transitioning to the sustainment phase and for an STC region becoming eligible for federal STC program

sustainment funding. Also, expansion to the principal pathways is being planned and executed. Phase III is expected to last 1 year.

**Phase IV (Sustainment):**

At the end of the 5-year period, after the awarding of the cooperative agreement and contingent upon successful completion of the regional FSE, a region enters the Sustainment phase of the STC program. During this phase, the region will continue to train and exercise its personnel while refreshing equipment. To maintain eligibility for federal STC sustainment funding, a region is expected to successfully complete an FSE once every 5 years. This requirement is intended to facilitate long-term sustainment of the regional detection and reporting capability. It will require enduring program management by the local program office to maintain eligibility for continued federal support. Expansion planning and execution continue in this phase.

## Appendix: Abbreviations

<b>Abbreviation</b>	<b>Definition</b>
COVID-19	Coronavirus Disease 2019
CWMD	Countering Weapons of Mass Destruction
DHS	Department of Homeland Security
FSE	Full-Scale Exercise
FOC	Full Operational Capability
FY	Fiscal Year
GAO	U.S. Government Accountability Office
HRUA	High-Risk Urban Areas
HSEEP	Homeland Security Exercise and Evaluation Program
IOC	Initial Operational Capability
LA/LB	Los Angeles/Long Beach
MOP	Measures of Performance
MOU	Memorandum of Understanding
NCR	National Capital Region
NOFO	Notice of Funding Opportunity
NOLA	New Orleans, Louisiana
NYC	New York City
POAM	Plan of Action and Milestones
PMO	Program Management Office
R/N	Radiological/Nuclear
SLTT	State, Local, Tribal, and Territorial
STC	Securing the Cities
TTX	Tabletop Exercise