Create Regional Outreach Groups to Establish Connections and Build Trust

By Matt A. Mayer   August 2016

Key Points

- Countering violent extremism in America will require closer cooperation and integrating efforts between Muslim communities and local law enforcement.

- The Department of Homeland Security (DHS) should fund the creation of regional outreach groups (ROGs) that can serve as meeting spaces between local law enforcement and Muslim communities.

- To efficiently use federal funds, these ROGs should be located in metropolitan areas already identified by the DHS as being at high risk of terrorist attack.

With the rise of the Islamic State of Iraq and the Levant (ISIS) and its intent to direct, enable, and inspire attacks in the United States, improving how America deals with this latest threat is more vital than ever. In light of the Orlando terrorist attack in June 2016, such advances will allow law enforcement entities to develop deeper relationships within the Muslim community, enabling them to more effectively counter violent extremism (CVE).

Our communities clearly have gaps in which individuals are falling prey to the recruitment tactics of terrorist groups. In many cases, family, friends, neighbors, coworkers, and acquaintances of individuals being radicalized have some suspicions of what is happening. The more connections that exist between local law enforcement and the Muslim community, the greater chance both groups have to deploy CVE resources.

Policymakers need to recognize that America can achieve success against terrorists only by deploying both a sword and a shield. My report

Enhanced Human Intelligence Is Key to Defeating Terrorists made the case for significantly expanding local law enforcement's use of human intelligence (HUMINT) to detect and stop terrorist attacks.[1] This report serves as a complementary piece aimed at increasing the connections and trust Muslim communities have with local law enforcement.

Most local law enforcement agencies have limited staff and expertise, and therefore it is unrealistic to expect every law enforcement agency in America to deploy resources for specific outreach to Muslim communities. For this reason, the resources of the federal government will be essential to improving outreach and trust.

Specifically, using federal terrorism funds from the US Department of Homeland Security (DHS) to support and create Regional Outreach Groups (ROGs) to serve as meeting spaces between local law enforcement and Muslim communities would improve the mutual trust necessary for a successful CVE effort.

Basing these around the 28 jurisdictions eligible for Urban Areas Security Initiative (UASI) funds would consolidate resources and enable iterative learning.[2] The UASI grant program already focuses federal terrorism funding to cities deemed to possess the greatest risk of a terrorist attack based on threat intelligence, making it a logical source for funds and requiring only a small extension of the grant program's authorities.

Why ROGs Are Needed

First, it is important that any CVE effort in the United States is not federally driven, but led and run by local law enforcement. Unlike the FBI, local law enforcement already possesses long-term relationships with diverse communities. These relationships provide local law enforcement with the best chances of closing gaps where radicalization can occur. Moreover, given local law enforcement's long-term work with community policing and engagement, building trusted partnerships is far more likely and easier to do.

For example, the FBI has created Shared Responsibility Committees (SRCs) that aim to bring together officials from federal and local law enforcement, representatives from mental health and other city and school programs, social workers, and imams and other religious leaders to develop intervention strategies for those at risk of being persuaded by ISIS or other radical propaganda.[3] Aside from the FBI's SRC program, there is no other nationwide federal CVE effort focused on improving the connections between local law enforcement and the Muslim communities within their jurisdictions.

While the FBI initiative is a good one, these activities will likely be viewed suspiciously if they appear to be federally driven and lack local leadership and buy-in.[4] In some cases, the only experience some communities have with federal law enforcement entities is negative. However, the idea behind the SRCs recognizes the importance of integrating Muslim communities in the United States.

The Obama administration conducted a national working group on the issue of how best to prevent radicalization and strengthen community ties. The White House's 2011 report, *Empowering Local Partners to Prevent Violent Extremism in the United States*, recognizes that Muslim American communities are both the targets of recruitment by radical terrorists and the best positioned to take the lead in protecting themselves from radical ideologies. As it states, "Muslim American communities have categorically condemned terrorism, worked with law enforcement to help prevent terrorist attacks, and forged creative programs to protect their sons and daughters from al-Qa'ida's murderous ideology."[5] Ironically, the report does not even mention ISIS, but focuses on al Qaeda.

This realization has led to community-based efforts across the country. For example, the Muslim Public Affairs Council (MPAC) created the Safe Spaces Initiative in 2014 to assist in CVE. Recognizing that "many factors raise a person's risk of moving from extreme thoughts into illegal and violent behavior," MPAC identified five key factors. These are:

- **"The emotional 'pull' to act in the face of injustice."** Emotions, rather than ideology, can affect many individuals' decision to engage in violence. Thus, the intellectual details of an ideology are less important than the emotional appeal of "seeing oneself as a defender of Muslims against perceived Western aggression."

- **"Thrill, excitement and 'coolness.'"** For some individuals, the attraction to illegal and violent behavior stems from its perception as being exciting and "cool," as well as the sense of adventure.

- **"Status and internal code of honor."** For some, being more defiant and violent is a path to increasing their status or part of adhering to an internal code of honor.

- **"Peer pressure."** Committing violent acts can be a means to achieve greater status within like-minded groups.

- **"The lack of alternatives."** A lack of alternative activities or information that

dissuade individuals from committing violent acts also facilitates the movement toward violence. One of the most consistent features of *takfiri* violent extremists, who accuse other Muslims of apostasy, is a lack of religious knowledge and political activity.[6]

To combat the pull of these factors, MPAC recommends that Muslim communities "expand [their] community institution's network of trusted contacts," which "include[s] getting to know and building strong working relations with [their] local law enforcement agencies."[7]

In follow-up to its report on homegrown violent extremism, the Obama administration released a road map in 2011 on how to build more resilient communities. The White House's *Strategic Implementation Plan for Empowering Local Partners to Prevent Violent Extremism in the United States* echoed MPAC's call for broadening contacts, such as incorporating "communities that are being targeted by violent extremists into broader forums with other communities" to amplify integration efforts.[8] The report concludes by expressly committing to "increase support for local, community-led programs and initiatives to counter violent extremism, predominantly by identifying opportunities within existing appropriations for incorporating CVE as an eligible area of work for public safety, violence prevention, and community resilience grants."[9]

The Los Angeles Police Department Model

A model already exists for the federal government to direct terrorism funding.[10] For more than eight years, the Los Angeles Police Department (LAPD) has dedicated resources to engage in purely community-outreach efforts. The program includes seven officers whose daily jobs are to interface with their assigned communities to maintain strong connections and high levels of trust. The role of these engagement officers is expressly not to collect intelligence or spy on their communities.

Figure 1. Los Angeles CVE Framework Overview

Source: Los Angeles Interagency Coordination Group in Collaboration with Community Stakeholders, *The Los Angeles Framework for Countering Violent Extremism*, February 2015, 11.

The LAPD released *The Los Angeles Framework for Countering Violent Extremism*, which it developed via the Los Angeles Interagency Coordination Group in Collaboration with Community Stakeholders in February 2015. This collection of law enforcement entities, health care agencies, and their federal partners from three counties began in 2008 and expanded to its current form as connections were made and relationships grew. The Los Angeles Framework contains three key components: prevention, intervention, and interdiction (Figure 1). As noted, "These components are independent of one another, yet are collectively integral to successfully addressing the complexities of CVE."[11]

The prevention component focuses on the communal level by developing and holding community-oriented activities and conversations. The intervention component, or "Off Ramps," focuses resources such as counseling and mentoring on an individual in the radicalization process. The interdiction component uses traditional police powers to stop potential criminal activities.

The Los Angeles CVE framework identifies specific ways to engage communities along three pillars: awareness, community inclusion, and participation of women and youth (Table 1).[12]

The LAPD views such efforts as necessary to create resilient communities. Even though these engagement activities are not specifically CVE-centric, "the outcomes of such programs are naturally in line with promoting the resilience and

Table 1. Established Formats for Engagement

Awareness	Community Inclusion	Participation of Women and Youth
Public Forums	Community Working Groups	Young Adult Engagement and Leadership Programs
Town Halls	Community Advisory Boards	Advisory Groups
Workshops	Interfaith Events	Women's Leadership Programs
Conferences		
Press Conferences		
Participating in or Cohosting Community Events		

Source: Los Angeles Interagency Coordination Group in Collaboration with Community Stakeholders, *The Los Angeles Framework for Countering Violent Extremism*, February 2015, 4.

healthy communities needed to combat nefarious ideologies that promote violent extremism."[13] The end goal is to overcome obstacles "around identity formation, integration, inter-group relations, political discourse, and social services."[14]

Deputy Chief Michael Downing started the LAPD's outreach program by leveraging past community-based efforts. As recently profiled in the *New York Times*, "Chief Downing established a regular forum to meet with Muslim leaders, modeled after one he had formed with the LGBT activists in Hollywood."[15] Chief Downing didn't just attend meetings, however; "he set about educating himself about Islam through courses, readings and travel abroad. And he came to see American Islam as perhaps the world's best hope for a vibrant, moderate iteration of the faith."[16]

Indeed, the LAPD model itself bears many similarities to the community-oriented policing models that focus on police building ties and working closely with community members, which are generally regarded as successful policing strategies for increasing citizen satisfaction and trust in the police.[17]

The ROG concept builds on the LAPD's example and on lessons learned from nearly two decades of community-oriented policing by expanding the LAPD's program to include other local law enforcement agencies in neighboring jurisdictions and other Muslim communities not within the LAPD's area of operation.[18] ROGs would aim to meet every week in locations that accommodate all the various community stakeholders within their areas. Because few local law enforcement agencies possess the LAPD's staffing levels and resources, the goal is to make it easier for medium and smaller law enforcement agencies to staff these gatherings.

DHS grant funds would cover all costs of hosting and operating the ROG. A recent report from the DHS on CVE lends itself to funding this concept.[19] To ensure smaller law enforcement entities that demonstrate an inability to pay can still participate, DHS grant funds could cover the personnel costs of the officers assigned to the ROG and related outreach activities. With an increasing amount of local law enforcement budgets getting swallowed by post-Ferguson technology requirements such as cameras in cars and on officers, adding yet another cost is not plausible.

It is crucial to understand that the ROG is not a spying tool for local law enforcement. Rather, it is a forum for the Muslim community and law enforcement to come together to seek common ground and build trust. As demonstrated by the LAPD, it "formally separated the investigative and community-relations functions in [the] bureau to try to assuage Muslim concerns of being spied upon under the guise of outreach."[20] If a Muslim leader brought an individual to the attention of a community-outreach officer, the officer would pass along that information to an investigative officer, but the outreach officer is not liaising with the Muslim community for the purpose of getting tips or gathering intelligence.

Because the LAPD has gained enormous amounts of experience in proper community engagement, the DHS should leverage its knowledge and put funding and support behind a broader effort to design and train ROG groups nationwide. By applying the LAPD's best practices and techniques, policymakers can ensure that

ROGs become strong community organizations that increase connections and trust between local law enforcement and Muslim communities, which is vital in an ISIS-inspired environment.

Where ROGs Are Needed

Locating ROGs only within areas where there is a high risk of terrorist attack will ensure federal money is not wasted. There are 28 eligible urban areas under the FY 2016 UASI grant program.[21] An urban area selected for UASI funding has already been identified, through a risk-rating method used by the DHS, as being a high risk for terrorist attack. Yet, simply placing ROGs within each of the 28 jurisdictions would not be an efficient allocation of resources.

Expanding the jurisdictions deemed high-risk under the UASI grant program to include jurisdictions nearby would more efficiently broaden the coverage of the ROG's activities. To be clear, the expansion to include other jurisdictions should not make those jurisdictions eligible for direct UASI funding or participation in other UASI programs; rather, it will merely allow the UASI-eligible jurisdiction to provide financial support to cover costs associated with participation in the ROG.

Another way to identify jurisdictions that should participate is to use the parameters of the Combined Statistical Area (CSA) and—if a CSA is not designated for that jurisdiction yet—the Metropolitan Statistical Area (MSA) for each UASI jurisdiction.[22] Although it is a rough metric of risk, larger populations generally will include a critical mass of infrastructure and dense populations that present significant vulnerabilities (possible targets) and consequences (deaths, injuries, and destruction of property). Using this approach, the 28 remaining UASI jurisdictions get combined into 24 ROG areas. Roughly 159 million people live in the 24 ROG areas, which cover nearly 50 percent of the US population.[23]

Figure 2. Proposed Regional Outreach Groups
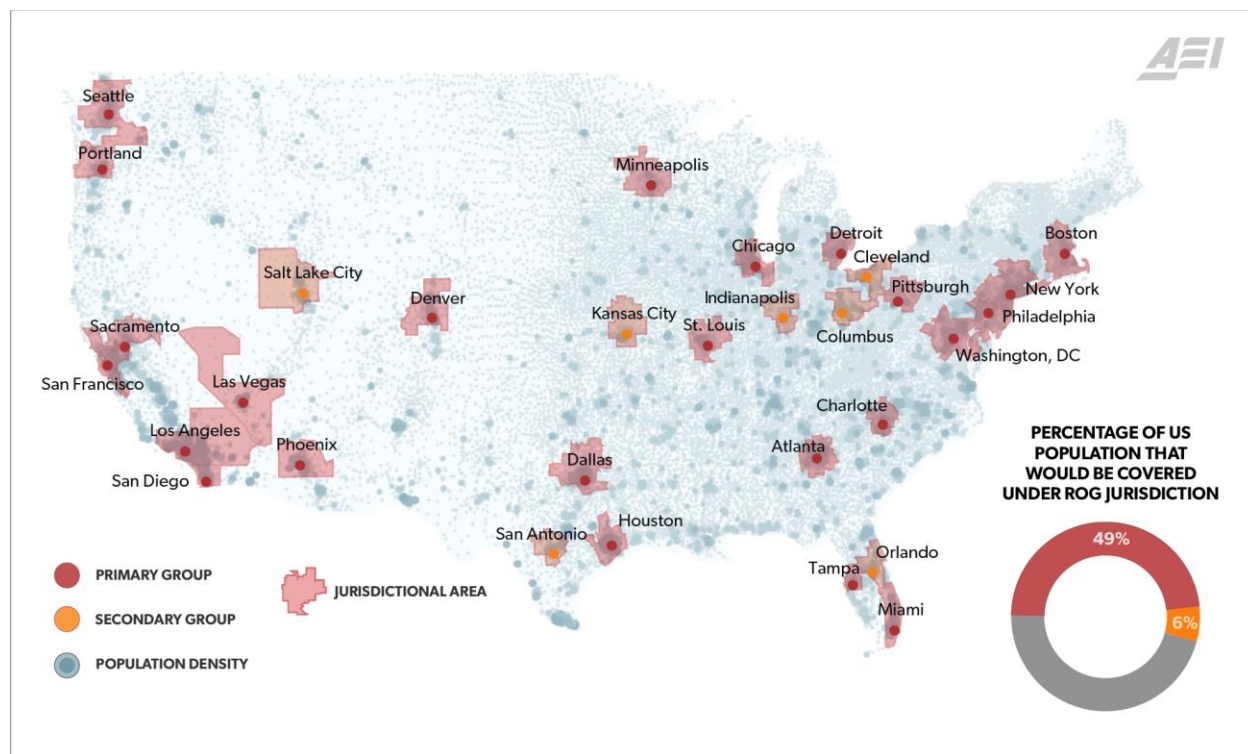
Source: US Census Bureau, Population Division, Annual Estimates of the Resident Population: April 1, 2010 to July 1, 2015, http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml.

Including representatives from all county law enforcement agencies, as well as law enforcement entities from cities with populations of 15,000 people or more, for each ROG area would ensure representation from a wide segment of jurisdictions. Naturally, law enforcement officers from different jurisdictions have different perspectives, information, and experiences that all need to be brought together. Similarly, ROGs should include representatives from mosques located within the area,[24] as well as leaders from Muslim nonprofits and civic groups. Again, the goal is to ensure all stakeholders' voices are heard and to broaden connections across jurisdictions.

The aim of each ROG is to deepen ties between the Muslim community and local law enforcement within each sub-ROG jurisdiction and across the ROG jurisdiction. By strengthening ties, the Muslim community and local law enforcement will be in better positions to communicate on tough issues, de-escalate misunderstandings, foster more resilient communities, and seek joint solutions to seemingly intractable problems.

For example, when the LAPD and Muslim groups fought "over the official police definition of 'suspicious activity' and the department's plan to map areas of heavy Muslim populations," the fight did not result in a total breakdown in the relationships. The "two sides negotiated compromises on both matters" that did not satisfy everyone, but at least kept the key players engaged in the process.[25]

As a further example, police in Las Vegas have also embarked on a similar effort to build trust and reach out to the city's Muslim community, which has similarly reduced tensions and suspicion.[26]

Conclusion

Our aim in fighting radical Islamic terrorists who seek to harm Americans must be greater than just keeping up with them. Instead of constantly fighting the last terrorist attack, we have to be more proactive by evolving past them in a manner that gives our law enforcement community the best chance to detect and stop potential terrorist activity. Similarly, Muslims in America do not want to be defined by the bad actors on the fringes of their communities. One way to meet the needs of both law enforcement and the Muslim community is to strengthen the connections and trust between the two groups.

By creating Regional Outreach Groups in higher-risk urban areas and devolving their operations and management to on-the-ground local law enforcement, the federal government can jump ahead of ISIS's efforts to sow alienation and mistrust between Muslims and the United States. The use of hard power such as increased HUMINT is important, but so is the expansion of soft power activities such as community outreach. Our ability to defeat terrorists depends on both.

About the Author

Matt A. Mayer (@ohiomatt) is a visiting fellow on homeland security issues and former senior official at the US Department of Homeland Security.

Appendix

UASI Jurisdiction	Counties	2015 Population
Phoenix, Arizona	Maricopa, Pinal	4,574,531[1]
Anaheim-Long Beach-Los Angeles-Riverside-Santa Ana, California	Los Angeles, Orange, Riverside, San Bernardino, Ventura	18,679,763
Bay Area, California	Alameda, Contra Costa, Marin, San Benito, San Francisco, San Joaquin, San Mateo, Santa Clara, Santa Cruz, Solano, Sonoma	8,571,458
Sacramento, California	**CA:** El Dorado, Nevada, Placer, Sacramento, Sutter, Yolo, Yuba **NV:** Douglas	2,591,736
San Diego, California	San Diego	3,299,521
Denver, Colorado	Adams, Arapahoe, Boulder, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, Park, Weld	3,418,876
Miami-Fort Lauderdale, Florida	Broward, Indian River, Martin, Miami-Dade, Okeechobee, Palm Beach, St. Lucie	6,654,565
Tampa, Florida	Hernando, Hillsborough, Pasco, Pinellas	2,975,225
Atlanta, Georgia	Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Hall, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spalding, Walton	5,904,330
Chicago, Illinois	**IN:** Jasper, Lake, Newton, Porter **IL:** Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, Will **WI:** Kenosha	9,551,031
Boston, Massachusetts	**CT:** Windham **MA:** Barnstable, Bristol, Essex, Middlesex, Norfolk, Plymouth, Suffolk, Worcester **NH:** Belknap, Hillsborough, Merrimack, Rockingham, Strafford **RI:** Bristol, Kent, Newport, Providence, Washington	8,152,573
Detroit, Michigan	Genesee, Lapeer, Livingston, Macomb, Monroe, Oakland, St. Clair, Washtenaw, Wayne	5,221,340
Twin Cities, Minnesota	**MN:** Anoka, Benton, Carver, Chisago, Dakota, Goodhue, Hennepin, Isanti, Le Sueur, McLeod, Mille Lacs, Ramsey, Rice, Scott, Sherburne, Sibley, Stearns, Washington, Wright **WI:** Pierce, St. Croix	3,866,768
St. Louis, Missouri	**IL:** Bond, Calhoun, Clinton, Jersey, Macoupin, Madison, Monroe, St. Clair **MO:** Franklin, Jefferson, Lincoln, St. Charles, St. Francois, St. Louis (county), Warren, Washington	2,902,896
National Capital Region	District of Columbia **MD:** Anne Arundel, Baltimore (county), Calvert, Carroll, Charles, Dorchester, Frederick, Harford, Howard,	9,625,360

	Montgomery, Prince George's, Queen Anne's, St. Mary's, Talbot, Washington **PA:** Franklin **VA:** Alexandria, Arlington, Clarke, Culpeper, Fairfax, Falls Church, Fauquier, Frederick, Fredericksburg, Loudoun, Manassas, Manassas Park, Prince William, Rappahannock, Spotsylvania, Stafford, Warren, Winchester **WV:** Berkeley, Hampshire, Jefferson	
Las Vegas, Nevada	**AZ:** Mohave **NV:** Clark, Nye	2,362,015
Newark, New Jersey-New York City, New York	**CT:** Fairfield, Litchfield, New Haven **NJ:** Bergen, Essex, Hudson, Hunterdon, Mercer, Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, Sussex, Union, Warren **NY:** Bronx, Dutchess, Kings, Nassau, New York, Orange, Putnam, Queens, Richmond, Rockland, Suffolk, Ulster, Westchester **PA:** Carbon, Lehigh, Monroe, Northampton, Pike	23,723,696
Charlotte, North Carolina	**NC:** Cabarrus, Cleveland, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, Stanly, Union **SC:** Chester, Lancaster, York	2,583,956
Portland, Oregon	**OR:** Clackamas, Columbia, Marion, Multnomah, Polk, Washington, Yamhill **WA:** Clark, Skamania, Yakima	3,048,149
Philadelphia, Pennsylvania	**DE:** Kent, New Castle **MD:** Cecil **NJ:** Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester, Salem **PA:** Berks, Bucks, Chester, Delaware, Montgomery, Philadelphia	7,183,479
Pittsburgh, Pennsylvania	**OH:** Jefferson **PA:** Allegheny, Armstrong, Beaver, Butler, Fayette, Indiana, Lawrence, Washington, Westmoreland **WV:** Brooke, Hancock	2,648,605
Dallas-Fort Worth-Arlington, Texas	**OK:** Bryan **TX:** Collin, Cooke, Dallas, Denton, Ellis, Fannin, Grayson, Henderson, Hood, Hopkins, Hunt, Johnson, Kaufman, Navarro, Palo Pinto, Parker, Rockwall, Somervell, Tarrant, Wise	7,538,055
Houston, Texas	Austin, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, Waller	6,678,990
Seattle, Washington	Island, King, Kitsap, Mason, Pierce, Skagit, Snohomish, Thurston	4,526,709

Source: US Census Bureau, Population Division, Annual Estimates of the Resident Population: April 1, 2010 to July 1, 2015, http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml.

Notes

1. Matt A. Mayer, "Enhanced Human Intelligence Is Key to Defeating Terrorists," American Enterprise Institute, June 16, 2016, https://www.aei.org/publication/enhanced-human-intelligence-is-key-to-defeating-terrorists/.

2. Cleveland likely made the list in 2016 only due to the Republican National Convention being held there in July and will not be on the list again in 2017. It was not on the list in 2015 when the DHS finally cut the list down to fewer than 30 cities. See Department of Homeland Security, Notice of Funding Opportunity (NOFO) Fiscal Year 2016 Homeland Security Grant Program (HSGP), February 2016, 32, http://www.fema.gov/media-library-data/1455569937218-3daa3552913b8affe0c6b5bc3b448635/FY_2016_HSGP_NOFO_FINAL.pdf.

3. Michael Hirsh, "Inside the FBI's Secret Muslim Network," *Politico*, March 24, 2016, http://www.politico.com/magazine/story/2016/03/fbi-muslim-outreach-terrorism-213765#ixzz44sjmwEYB.

4. Nicole J. Henderson et al., *Law Enforcement & Arab American Community Relations After September 11, 2001: Engagement in a Time of Uncertainty* (New York: Vera Institute of Justice, 2006), 27, http://www.vera.org/policerelations.

5. White House, *Empowering Local Partners to Prevent Violent Extremism in the United States*, August 2011, C3, https://www.whitehouse.gov/sites/default/files/empowering_local_partners.pdf.

6. Muslim Public Affairs Council, *Safe Spaces Initiative: Tools for Developing Healthy Communities*, 22, copy on file with author.

7. Ibid., 101.

8. White House, *Strategic Implementation Plan for Empowering Local Partners to Prevent Violent Extremism in the United States*, December 2011, 7, https://www.whitehouse.gov/sites/default/files/sip-final.pdf.

9. Ibid., 11.

10. A good example of how not to engage in community outreach comes from the St. Paul Police Department. In that case, the community outreach program plan specifically included an intelligence-gathering function. Even though the department stated it never instituted the intelligence component, when the Muslim community discovered this intelligence component was part of the program, it undermined the program's ability to build trust. See Cora Currier, "Spies Among Us: How Community Outreach Programs to Muslims Blur Lines Between Outreach and Intelligence," Intercept, January 21, 2015, https://theintercept.com/2015/01/21/spies-among-us-community-outreach-programs-muslims-blur-lines-outreach-intelligence/.

11. Los Angeles Interagency Coordination Group in Collaboration with Community Stakeholders, *The Los Angeles Framework for Countering Violent Extremism*, February 2015, 2, https://www.dhs.gov/sites/default/files/publications/Los%20Angeles%20Framework%20for%20CVE-Full%20Report.pdf.

12. Ibid., 4.

13. Ibid., 5.

14. Ibid., 5.

15. Samuel G. Freedman, "Los Angeles Police Leader Makes Outreach to Muslims His Mission," *New York Times*, March 7, 2015, http://www.nytimes.com/2015/03/07/us/lapd-deputy-chief-muslims.html.

16. Ibid.

17. Department of Justice, *Community Policing Defined*, 2014, http://ric-zai-inc.com/Publications/cops-p157-pub.pdf; and Martin Maximo, "Community-Oriented Policing Strategies: Meta-Analysis of Law Enforcement Practices," Journalist's Resource, March 11, 2015, http://journalistsresource.org/studies/government/criminal-justice/the-impact-of-community-policing-meta-analysis-of-its-effects-in-u-s-cities.

18. Giving credit where credit is due, the idea of the ROG came from Sergeant Michael Sequin during a lunch conversation in Los Angeles in February 2016. The lunch involved several LAPD outreach officers and Sergeant Mike Abdeen from the Los Angeles County Sheriff's Department.

19. Homeland Security Advisory Council, Department of Homeland Security, *Countering Violent Extremism (CVE) Subcommittee: Interim Report and Recommendations*, June 2016, https://www.dhs.gov/sites/default/files/publications/HSAC/HSAC%20CVE%20Final%20Interim%20Report%20June%209%202016%20508%20compliant.pdf.

20. Freedman, "Los Angeles Police Leader Makes Outreach to Muslims His Mission."

21. See note 2.

22. Census Bureau, "Metropolitan and Micropolitan Statistical Areas Main," http://www.census.gov/population/metro/; and Census Bureau, "Delineation Files," July 2015, http://www.census.gov/population/metro/data/def.html.

23. In light of the terrorist attack in Orlando, it might be worth considering other areas for ROG participation. For example, six jurisdictions have CSA populations larger than the Las Vegas CSA (2,362,015): Cleveland-Akron-Canton, Ohio (3,493,596); Orlando-Deltona-Daytona Beach, Florida (3,129,308); Salt Lake City-Provo-Orem, Utah (2,467,709); Kansas City-Overland Park-Kansas City, Missouri/Kansas (2,428,362); Columbus-Marion-Zanesville, Ohio (2,424,831); and Indianapolis-Carmel-Muncie, Indiana (2,372,530). Similarly, one MSA jurisdiction has a population larger than the Las Vegas CSA: San Antonio-New Braunfels, Texas (2,384,075). Regardless of population totals, however, risk should be the primary driver for inclusion in the ROG program.

These additional jurisdictions should be included in only an ROG component of the UASI grant program and not as fully eligible jurisdictions.

24. Hartford Institute of Religion Research, "Database of Masjids, Mosques and Islamic Centers in the US," http://hirr.hartsem.edu/mosque/database.html.

25. Freedman, "Los Angeles Police Leader Makes Outreach to Muslims His Mission."

26. John M. Glionna, "Police in Las Vegas Forge Close Ties to the City's Muslim Community," *Washington Post*, May 22, 2016, https://www.washingtonpost.com/national/police-in-las-vegas-forge-close-ties-to-the-citys-muslim-community/2016/05/22/4f2a6e3c-1647-11e6-924d-838753295f9a_story.html.