

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
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* 3. Date Received: <input type="text" value="05/12/2022"/>	4. Applicant Identifier: <input type="text"/>
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5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>
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State Use Only:

6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>
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8. APPLICANT INFORMATION:

* a. Legal Name:

* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="(b)(6)"/>	* c. UEI: <input type="text" value="NIACHB9PNN93"/>
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d. Address:

* Street1:	<input type="text" value="Middlebury Institute"/>
Street2:	<input type="text" value="460 Pierce Street"/>
* City:	<input type="text" value="Monterey"/>
County/Parish:	<input type="text"/>
* State:	<input type="text" value="CA: California"/>
Province:	<input type="text"/>
* Country:	<input type="text" value="USA: UNITED STATES"/>
* Zip / Postal Code:	<input type="text" value="93940-2623"/>

e. Organizational Unit:

Department Name: <input type="text" value="Center on Terrorism, Extremism"/>	Division Name: <input type="text"/>
---	--

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: <input type="text"/>	* First Name: <input type="text" value="Meghan"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Rasmussen"/>	
Suffix: <input type="text"/>	

Title:

Organizational Affiliation:

* Telephone Number: <input type="text" value="(b)(6)"/>	Fax Number: <input type="text"/>
---	----------------------------------

* Email:

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

O: Private Institution of Higher Education

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Department of Homeland Security - FEMA

11. Catalog of Federal Domestic Assistance Number:

97.132

CFDA Title:

Financial Assistance for Targeted Violence and Terrorism Prevention

*** 12. Funding Opportunity Number:**

DHS-22-TTP-132-00-01

* Title:

Fiscal Year (FY) 2022 Targeted Violence and Terrorism Prevention (TVTP)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

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*** 15. Descriptive Title of Applicant's Project:**

Disrupting Video Games-Based Radicalization Through Collaborative Cross-Sector Networks (Innovation Track)

Attach supporting documents as specified in agency instructions.

Add Attachments

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16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

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17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="687,763.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="687,763.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

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21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed:

COLLEGES AND UNIVERSITIES RATE AGREEMENT

EIN: (b)(6)

DATE: 04/01/2021

ORGANIZATION:
Middlebury College

FILING REF.: The preceding
agreement was dated
01/25/2021

Middlebury, VT 05753-6175

The rates approved in this agreement are for use on grants, contracts and other agreements with the Federal Government, subject to the conditions in Section III.

SECTION I: INDIRECT COST RATES

RATE TYPES: FIXED FINAL PROV. (PROVISIONAL) PRED. (PREDETERMINED)

EFFECTIVE PERIOD

<u>TYPE</u>	<u>FROM</u>	<u>TO</u>	<u>RATE (%)</u>	<u>LOCATION</u>	<u>APPLICABLE TO</u>
PRED.	07/01/2020	06/30/2021	65.00	On-Campus (1)	All Programs
PRED.	07/01/2020	06/30/2021	54.00	On-Campus (2)	All Programs
PRED.	07/01/2021	06/30/2025	61.00	On-Campus (1)	All Programs
PRED.	07/01/2021	06/30/2025	29.00	Off-Campus (1)	All Programs
PRED.	07/01/2021	06/30/2025	51.00	On-Campus (2)	All Programs
PRED.	07/01/2021	06/30/2025	29.40	Off-Campus (2)	All Programs
PROV.	07/01/2025	Until Amended			Use same rates and conditions as those cited for fiscal year ending June 30, 2025.

*BASE

ORGANIZATION: Middlebury College

AGREEMENT DATE: 4/1/2021

(1) Applicable to Middlebury College

Direct salaries and wages including vacation, holiday, sick pay and other paid absences but excluding all other fringe benefits.

*BASE

(2) Applicable to Middlebury Institute of International Studies

Direct salaries and wages including vacation, holiday, sick pay and other paid absences but excluding all other fringe benefits.

ORGANIZATION: Middlebury College

AGREEMENT DATE: 4/1/2021

SECTION I: FRINGE BENEFIT RATES**

<u>TYPE</u>	<u>FROM</u>	<u>TO</u>	<u>RATE (%)</u>	<u>LOCATION</u>	<u>APPLICABLE TO</u>
FIXED	7/1/2020	6/30/2021	39.00	All (1)	Salaries and Wages
FIXED	7/1/2020	6/30/2021	34.00	All (2)	Salaries and Wages
FIXED	7/1/2021	6/30/2022	37.00	All (1)	Salaries and Wages
FIXED	7/1/2021	6/30/2022	34.00	All (2)	Salaries and Wages
PROV.	7/1/2022	Until amended	37.00	All (1)	Salaries and Wages
PROV.	7/1/2022	Until amended	34.00	All (2)	Salaries and Wages

** DESCRIPTION OF FRINGE BENEFITS RATE BASE:

Salaries and wages.

(1) Applies to Middlebury College.

(2) Applies to Middlebury Institute of International Studies.

ORGANIZATION: Middlebury College

AGREEMENT DATE: 4/1/2021

SECTION II: SPECIAL REMARKS

TREATMENT OF FRINGE BENEFITS:

Applicable to Middlebury College and Middlebury Institute of International Studies:

The fringe benefits are charged using the rate(s) listed in the Fringe Benefits Section of this Agreement. The fringe benefits included in the rate (s) are listed below.

TREATMENT OF PAID ABSENCES

Applicable to Middlebury College and Middlebury Institute of International Studies:

Vacation, holiday, sick leave pay and other paid absences are included in salaries and wages and are claimed on grants, contracts and other agreements as part of the normal cost for salaries and wages. Separate claims are not made for the cost of these paid absences.

OFF-SITE DEFINITION: The off-site rate will apply for all activities: a) Performed in facilities not owned by the organization and where these facility costs are not included in the indirect cost pools; or b) Where rent is directly allocated/charged to the project(s). Actual costs will be apportioned between on-site and off-site components. Each portion will bear the appropriate rate.

Applicable to Middlebury College:

1. The fringe benefit rate consists of Health Insurance, Life Insurance, FICA, Disability Insurance, Pension/Retirement, Unemployment Insurance, Workmen's Compensation, Dental Insurance, Employee Assistance Program and Sabbatical Research Leave.

Applicable to Middlebury Institute of International Studies:

2. The fringe benefit rate consists of Health Insurance, Life Insurance, FICA, Disability Insurance, Pension/Retirement, Unemployment Insurance, Workmen's Compensation, Dental Insurance, Employee Assistance Program and Sabbatical Research Leave.

** Your next fringe benefit proposal based on actual costs for the fiscal year ending June 30, 2021 will be due in our office by December 31, 2021.

** Your next indirect cost rate proposal for the fiscal year ending June 30, 2024 will be due in our office by December 31, 2024.

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds \$5,000.

ORGANIZATION: Middlebury College

AGREEMENT DATE: 4/1/2021

SECTION III: GENERAL

A. LIMITATIONS:

The rates in this Agreement are subject to any statutory or administrative limitations and apply to a given grant, contract or other agreement only to the extent that funds are available. Acceptance of the rates is subject to the following conditions: (1) Only costs incurred by the organization were included in its facilities and administrative cost pools as finally accepted; such costs are legal obligations of the organization and are allowable under the governing cost principles; (2) The same costs that have been treated as facilities and administrative costs are not claimed as direct costs; (3) Similar types of costs have been accorded consistent accounting treatment; and (4) The information provided by the organization which was used to establish the rates is not later found to be materially incomplete or inaccurate by the Federal Government. In such situations the rate(s) would be subject to renegotiation at the discretion of the Federal Government.

B. ACCOUNTING CHANGES:

This Agreement is based on the accounting system purported by the organization to be in effect during the Agreement period. Changes to the method of accounting for costs which affect the amount of reimbursement resulting from the use of this Agreement require prior approval of the authorized representative of the cognizant agency. Such changes include, but are not limited to, changes in the charging of a particular type of cost from facilities and administrative to direct. Failure to obtain approval may result in cost disallowances.

C. FIXED RATES:

If a fixed rate is in this Agreement, it is based on an estimate of the costs for the period covered by the rate. When the actual costs for this period are determined, an adjustment will be made to a rate of a future year(s) to compensate for the difference between the costs used to establish the fixed rate and actual costs.

D. USE BY OTHER FEDERAL AGENCIES:

The rates in this Agreement were approved in accordance with the authority in Title 2 of the Code of Federal Regulations, Part 200 (2 CFR 200), and should be applied to grants, contracts and other agreements covered by 2 CFR 200, subject to any limitations in A above. The organization may provide copies of the Agreement to other Federal Agencies to give them early notification of the Agreement.

E. OTHER:

If any Federal contract, grant or other agreement is reimbursing facilities and administrative costs by a means other than the approved rate(s) in this Agreement, the organization should (1) credit such costs to the affected programs, and (2) apply the approved rate(s) to the appropriate base to identify the proper amount of facilities and administrative costs allocable to these programs.

BY THE INSTITUTION:

Middlebury College

(b)(6)

(SIGNATURE)

STEVEN S. MARINO, M.S.

(NAME)

Manager of Finance

(TITLE)

4-20-21

(DATE)

ON BEHALF OF THE FEDERAL GOVERNMENT:

DEPARTMENT OF HEALTH AND HUMAN SERVICES

(b)(6)

(SIGNATURE)

Darryl W. Mayes

(NAME)

Deputy Director, Cost Allocation Services

(TITLE)

4/1/2021

(DATE) 4475

HHS REPRESENTATIVE:

Rebecca Kaplan

Telephone:

(b)(6)

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* 1. Type of Submission:

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 Continuation
 Revision

* If Revision, select appropriate letter(s):

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05/17/2022

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5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: President and Fellows of Middlebury College

* b. Employer/Taxpayer Identification Number (EIN/TIN):

(b)(6)

* c. UEI:

N1ACHB9PNN93

d. Address:

* Street1:

Middlebury Institute

Street2:

460 Pierce Street

* City:

Monterey

County/Parish:

* State:

CA: California

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

93940-2623

e. Organizational Unit:

Department Name:

Center on Terrorism, Extremism

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Meghan

Middle Name:

* Last Name:

Rasmussen

Suffix:

Title: Director of Sponsored Programs

Organizational Affiliation:

Middlebury Institute

* Telephone Number:

(b)(6)

Fax Number:

* Email:

(b)(6)

Application for Federal Assistance SF-424

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Private Institution of Higher Education

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

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*** 12. Funding Opportunity Number:**

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* Title:

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13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

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*** 15. Descriptive Title of Applicant's Project:**

Disrupting Video Games-Based Radicalization Through Collaborative Cross-Sector Networks

Attach supporting documents as specified in the instructions

Add Attachments

Delete Attachments

View Attachments

Form Attachments:

Add Attachment

Delete Attachment

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Done

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* a. Applicant

* b. Program/Project

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View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="699763.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="699,763.00"/>

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b. Program is subject to E.O. 12372 but has not been selected by the State for review.

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Yes No

If "Yes", provide explanation and attach

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21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

Project Title: Disrupting Video Games-Based Radicalization Through Collaborative Cross-Sector Networks

Applicant: Middlebury’s Center on Terrorism, Extremism, and Counterterrorism in collaboration with Take This and Logically

Primary Location of Applicants:

- Monterey, California (CTEC/Middlebury Institute)
- Kirkland, WA (Take This)
- Washington, D.C. (Logically)

Additional Locations of Activities:

- San Francisco Bay Area, CA
- Seattle, WA
- Montreal, Canada

Application Track: Innovation

Project Type: N/A

Amount of Funds Requested: \$699,763

Proposal Abstract

Over the past decade, video games have increasingly become focal points of social activity and identity creation for adolescents and young adults. Relationships made and fostered within game ecosystems routinely cross over into the real world and are impactful parts of local communities. Correspondingly, extremists have used video games and targeted video game communities for activities ranging from propaganda creation to terrorist mobilization and training^{1,2,3}. Game developers in general—from small, independent studios to multi-billion dollar multinational corporations—have lagged in awareness of how extremists may attempt to exploit their games, and how their communities can be targeted for radicalization. This joint project from the Center on Terrorism, Extremism, and Counterterrorism, Take This, and Logically seeks to develop a shared framework for understanding extremism in games. This includes the development of a set of best practices and centralized resources for monitoring and evaluation of extremist activities as well as a series of training workshops for the monitoring, detection, and prevention of extremist exploitation in gaming spaces for community managers, multiplayer designers, lore developers, mechanics designers, and trust and safety professionals. In addition, this project will provide a first-of-its-kind collaborative structure for public-private partnerships on preventing and mitigating games-based extremism. Taken together, this project will simultaneously improve counter-extremism collaboration in the video game industry while also providing substantial capacity building within and across developers.

EMW-2022-GR-APP-00036

1. Needs Assessment

On May 14, 2022, an 18-year-old allegedly walked into a supermarket in Buffalo, NY, and murdered 10 people, most of whom were Black. The suspect was outfitted in body armor, live-streamed the attack to the Internet, and published a deeply racist manifesto. He also appears to have been active in video game communities⁴, and he planned his attack on a server on Discord—a games-focused chat app that has a long history of being used by far-right extremists². He is not the first suspect of a far-right attack that was entrenched within gaming communities.

Games have increasingly become a target of radicalization and exploitation by extremists⁵. While the role of video game content in encouraging violence has long been debated across industry, civil society, and policymaking circles, the role that video game mechanics, communities, and identities play in the radicalization process has garnered less attention⁶. However, extremism has become deeply linked to elements of video games, as evidenced by other high-profile examples of terrorists referencing game culture (e.g. the Christchurch, NZ, shooter yelling “Subscribe to PewDiePie,” or shootings live-streamed in such a way as to evoke the look and feel of first-person shooter games)^{7, 8}. In addition, extremists have developed identities that integrate elements from video games into their canon and propaganda, indicating that narrative and world design are targeted for use in radicalization as well⁹.

The video game industry is valued at over \$200 billion worldwide, and the biggest games routinely rank among blockbuster films for the most valuable entertainment properties¹⁰. An estimated 3.3 billion people play games worldwide¹¹, making it a truly global phenomenon. Games are increasingly a focal point of social life, and developers are building new games to encourage engagement and community-building. Despite this, developer and government understanding of how games become cultural assets of influence, and how they are subsequently leveraged for extremist goals, has lagged behind the exponential growth of games as an industry. While large social media companies often have dedicated subject matter experts and counter-extremisms teams on staff, many game developers and publishers do not have the capacity to build moderation teams robust enough to deal with these trends. Financial limitations do matter, but more important is a lack of collective knowledge about the specific and unique ways in which extremism manifests and exploits video games.

Public sector officials, too, have been slow to develop a framework for addressing extremism in video games. Dedicated efforts from government agencies have been rare, and those that exist have generally remained at the level of information-gathering rather than solutions-oriented action.

Together, these gaps have established a significant vulnerability in resilience to extremist radicalization, and extremists have acted in response to take advantage of this gap. The games

industry and public-sector community need a dedicated, robust framework for 1) understanding, 2) collaborating, and 3) addressing the radicalization efforts currently underway within games.

This project, led by CTEC, Take This, and Logically, will address a target population of practitioners in both the video game industry and government spaces who are responsible for disrupting radicalization pathways and encouraging safe communities. Our approach is built on a foundation in the social sciences, behavioral psychology, and extremism studies. We will begin by establishing a strong baseline for understanding the sociology and psychology of extremism in games, as well as a robust benchmark for the contemporary scope and nature of extremist activity in gaming communities. We will then work closely with industry partners, such as the Electronic Software Association and game developers, to establish a series of workshops geared towards both game designers and community managers. We will organize and run collaborative sessions with both government and industry stakeholders to establish a shared agenda for addressing extremism in games. Additionally, , we will build and publish an innovative framework and toolbox for consumption by game developers and government stakeholders worldwide to scale our approach to countering extremism in games.

2. Program Design

Problem Statement

Countering extremism in games and gaming communities requires a unique approach that considers the specific sociological, psychological, and cultural aspects of games. This program will improve knowledge and empower game developer and policymakers, building resilience to games-based radicalization by addressing Objectives 1 and 5 of the TVTP Grant program by **increasing awareness of the radicalization process within games and giving game developers and policymakers the tools to manage and reduce risks of extremism within games.**

Program Goals and Objectives

Goals: Leveraging the team’s expertise in the psychology and sociology of extremism and radicalization within games, the goal of this program is to develop a scaled approach to (i) educate game developers on how to build resilience within game structures to extremist exploitation, (ii) provide information and context to government officials to flexibly address games-based radicalization, and (iii) build collaborative public-private networks to create long-term strategies for resisting games-based extremism. CTEC, Take This, and Logically will develop a series of workshops, collaborative sessions, and toolboxes to achieve these goals.

The proposed project will be designed to provide research and capacity-building programming at the developer, public-sector, and cross-sector levels. This programming will target skills that are necessary for disrupting and preventing radicalization and extremist behavior in games, including:

- Scaled detection, monitoring, and enforcement of community policies;
- Understanding of how extremism evolves over time;
- Adaptability to the changing contours of games-based extremism;
- Knowledge of how specific elements of games (narrative, single-player mechanics, multiplayer features, communities) distinctly impact extremist behavior;
- Resilience, health, and safety for community managers;
- Public official best practices to avoid over-regulation and over-enforcement while still providing support to developers.

The proposed program supports the DHS Strategic Framework for Countering Terrorism and Targeted Violence by building a greater understanding around the problem of extremism in the context of video games through cutting-edge research carried out by academic experts in psychology, sociology, and extremism studies. In addition to establishing a strong public baseline for characterizing games-based extremism, this research will also inform a series of workshops that will teach game developers how to recognize attempts by hostile actors to recruit and exploit people who engage with their games. This project will also establish a robust, sustainable forum for collaboration across sectors for the purpose of coordinating games-based extremism prevention.

Objectives

By the end of Year 1 of the project period, CTEC and Take This will complete innovative research, leveraging scaled analytical techniques like surveys and social media intelligence analysis, to establish a foundation of knowledge of the nuances of extremist behavior within games and gaming communities. Alongside this research, the project team will begin two series of educational workshops with game developers, one targeting narrative and single-player designers, and the other targeting multiplayer designers, community managers, and trust and safety teams, to be completed in Year 2. Also in Year 2, the project team will establish a collaborative private/public network to share information, discuss best practices, and open lines of communication specifically regarding extremist trends in games. Finally, by the end of Year 2, the project team will publish three toolboxes: 1) methods for scaled extremism detection in games, 2) best practices for game designers, and 3) a public sector-oriented manual for how to engage with the games industry to address games-based extremism.

Program effectiveness will be measured by evaluating participants' awareness of extremist activity in games, to include propaganda creation, organization, mobilization, and grooming. This assessment will be done via pre- and post-workshop surveys. Effectiveness will also be measured by the scope of engagement across the games industry and policymaking spaces.

Logic Model Theory of Change

Extremist movements have increasingly focused on video games for radicalization and mobilization efforts. Video games provide a combination of social networking, youth-centered audiences, and particularly intense trust-building mechanisms that can be particularly vulnerable to extremist targeting. While individuals are radicalized based on a complicated variety of overlapping social, cultural, and emotional factors, a preventing and countering violent extremism (P/CVE) program focusing on *platforms* of radicalization can disrupt radicalization activity at its source. This can provide more comprehensive and diverse prevention than some target-focused efforts.

However, as complex, multifaceted entertainment and socialization products, games still provide multiple different vectors for exploitation by extremist communities. Narrative, lore, and game mechanics can and have all been used by extremist groups in propaganda, and the fandom communities that emerge based on the lore of certain games are vulnerable to radicalization influences. Multiplayer features, including cooperative mechanics and competitive modes, are often used by extremist groups for grooming, training, and social networking.

A successful P/CVE program focused on improving resilience within the video game industry must take into account all of these factors. It must 1) involve all elements of a video game design team: mechanics designers, narrative designers, and community managers, 2) provide evidence-based solutions for disrupting exploitation opportunities while remaining compatible to the spirit of games, 3) contribute to the safety and security of frontline games workers, especially community managers, and 4) provide a template for collaborative, productive work between game developers and policymakers.

This CTEC, Take This, and Logically project will address each of these areas through an innovative, comprehensive, and collaborative approach to capacity building within the games industry. Through cutting-edge computational social science research, roundtable discussions, collaborative workshops, and the development of reusable, flexible frameworks, this project will provide a holistic approach to strengthening the games industry to the threats of extremist exploitation.

Assumptions:

Although very little specific, empirical literature on extremist exploitation of games and games-centric communities has been published, we assess that extremism in games will likely continue to increase in prevalence and risk. This assessment is based on years of extensive qualitative research and monitoring of video game communities, and our work is based on the research-informed belief that video game developers are a first line of defense and community resilience to the influences of extremism.

Inputs:

(A) Gamer population sociological research

The project team will conduct innovative research to understand the infiltration of extremist ideas across gaming populations at scale. The first study will be survey-based and aim to understand *dark participation* in games. The survey will include about 30 self-report questions assessing gamers' experiences with various forms of dark participation (e.g., trash talking, hate speech, doxxing), the overall perception of the social community (e.g., good natured, hurtful/toxic), and questions relating specifically to activities associated with extremism (e.g., fascist iconography, usernames, etc.).

The second study will focus on the process of *identity fusion* in games. Identity fusion is potentially a key vulnerability for integration into extremist ideologies and social groups among game players. While we know that online gaming communities can have positive effects on our psychological well-being at the individual level, it is possible that the nature of the community around players can impact that value to deleterious interpersonal and/or societal effects. To assess the influence of the nature of gaming communities on identity fusion outcomes, we will administer a self-report questionnaire to players looking at the impact of identity fusion and psychological outcomes (both positive and negative) within the context of their social community. This research will also involve extensive archiving, analysis, and assessment of how games and games mechanics become *cultural assets* within communities. This will involve specific exploration of trends such as the use of first-person shooter aesthetics in mass-shooting livestreams, the creation of "leaderboards" for terrorists, and the integration of game aesthetics and lore into the specific identity creation systems of extremist groups.

(B) Game developer interviews

Currently, understanding of extremism in games is siloed and there is limited cross-disciplinary development of trust and safety strategies, front-line developer encounters, and internal developer experiences in dealing with extremism and radicalization. The project team will conduct interviews with practitioners in the games industry, with an emphasis on collecting viewpoints from a diverse range of roles and companies. Information from the interviews will be collected, compiled, and analyzed to inform the creation of toolboxes and frameworks for consumption by the industry.

(C) Media and propaganda research and games as cultural assets

Games are a critically important but understudied part of extremist communication, rhetoric, identity, and propaganda. Content from games is frequently adopted and remixed for various extremist purposes, and fandoms around games are frequently targeted for radicalization and exploitation. The project team will undertake groundbreaking research into the unique and dangerous role that games and game content can play in the establishment of extremist identities. This will be based on large-scale rhetorical analysis using social media data collection and in-

depth historical archive research to specifically track the methods by which fringe groups leverage games for communications purposes.

(D) Scaled community and social network analysis

CTEC, Take This, and Logically will undertake a sophisticated, mixed-methods approach to extremist threat detection on video game platforms. Using scaled, automated methods (e.g. Logically's Intelligence platform) alongside subject matter experts, the team will characterize how extremists—in particular far-right extremists—use games and game platforms to create shared identities, communicate, organize, mobilize, and spread propaganda.

(E) Partners

Take This currently has industry partners with whom it is engaged in initial aspects of this work, including the Fair Play Alliance, the Entertainment Software Association, Games for Change and numerous companies including Roblox, EA, Microsoft, and others. We anticipate being able to bring our workshops to these entities - and others - in year two of the grant.

Activities:

Survey Phase

CTEC, Take This, and Logically staff members are experts at conducting social and cultural analysis. In this phase, the project team will create and deploy surveys to collect data from people who are immersed in video game communities. In conjunction with game developer partners, these surveys will be delivered directly to gamers and will be developed for the purpose of understanding gamer self-identification trends. The first set of surveys will collect data about dark participation, and the second will collect data about identity fusion. We will receive approval from Middlebury's Institutional Review Board before beginning any of the project activities. We expect to receive approval by September 2022.

Following completion of the surveys, the project team will collect, clean, and analyze the findings for the purpose of creating a strong foundation of knowledge about the scope of extremist behavior, awareness, and identity within gaming communities. This data will provide first-of-their-kind, high-detail, and statistically robust metrics about how games interact with extremism. The conclusions will be essential for assessing the effectiveness of existing trust and safety measures, identifying vulnerabilities, and understanding how communities react to the presence of extreme behaviors.

Community Analysis Phase

Concurrent with the surveys, the project team will use scaled community analysis techniques to collect and process large amounts of social media and game platform data for the purpose of understanding community creation, identity expression, mobilization, and radicalization trends.

Focusing specifically on games and game-adjacent platforms, this will be the first project of its scope to research the unique elements of online games-based extremism relative to social media-based extremism more generally. In addition, this research will allow the project team to produce a number of innovative products that can be leveraged by game developers and policymakers, including an indicator database of terms, symbols, and signs of games-based extremism, social network analysis, and an in-depth analysis of propaganda that leverages game content.

Narrative and Game Design Workshop Series

Based on our extensive propaganda, identity creation, community development, and communications research, the project team will run a series of workshops geared toward game developers who work within narrative and world-building, game design, and game mechanics. The role of the narrative and single-player elements of games in extremism are particularly understudied but also play an outsized role in the creation of extremist identities. As of today, there is no dedicated resource for game designers to understand how different elements of narrative and game design can be exploited by extremists; our workshops will target this vulnerability and work toward building awareness and resilience toward this aspect of extremism in games.

Multiplayer Design and Community Building Workshop Series

Games are increasingly used as social networking platforms for the purpose of both recruitment and mobilization. Past literature has demonstrated that relationship-building in games is unique compared to other online and offline interactions, and these unique characteristics may mean that relationships focused around games are particularly vulnerable to radicalization processes. In addition, multiplayer developers and community managers are often not equipped with the training or resources to understand the specifics of extremist behavior. This can result in the primary mechanisms of moderation and enforcement focusing disproportionately on player self-reports—which often over-represents harassment issues and misses radicalization—and community managers facing burnout and negative mental health impacts. Our workshops will serve to build resilience at both the multiplayer designer and front-line community manager levels, giving these stakeholders the skills and awareness they need to disrupt extreme behaviors.

Policymaker Workshop Series

In order to develop sustainable extremism prevention over the long term, the private-sector games industry needs more opportunities to collaborate constructively with policymakers and intelligence officials. Informed by empirical research and interviews with developers, the project team will hold a series of workshops featuring participants from both public and private organizations in order to level-set, synchronize, and develop best practices for addressing extremism in games. These workshops will focus on giving government stakeholders impactful, operational information about the complex extremist behaviors within games while also allowing

game companies to share their perspectives on how regulatory and law enforcement relationships can be more productive and effective.

Developer Toolboxes and Collaborative Framework Development

Based on data collected during the research phases, feedback from the workshop series, and analysis by the project team, we will create a set of toolboxes and frameworks for sustainable resilience- and capacity-building within game developers and across public and private sectors. One toolbox will contain best practices, moderation assistance, and specific analytic and disruption methodologies for front-line practitioners (community managers and trust and safety analysts) to better prevent extremism in game communities. Another will provide game designers a robust compendium of information about how extremists frequently exploit narrative and mechanic elements for use in identity creation and propaganda. Finally, our framework will establish a baseline of knowledge and agreed-upon best practices for collaborative, cross-industry approaches to preventing extremism in games.

01	Contextual Factors and Underlying Assumptions	<ul style="list-style-type: none"> • Underlying assumption: Extremists are actively targeting games because of specific characteristics of games that make them vulnerable to radicalization and mobilization efforts. This risk will continue to grow in the coming years as games become bigger and more social. • Contextual factors: Awareness and adoption of our toolboxes and framework will be essential for the long-term sustainability and success of the project. The project team will engage early with partners and collaborators to run awareness campaigns.
02	Inputs	<ul style="list-style-type: none"> • Funding via grants awarded to CTEC and Take This. • Developer partners and access to front-line practitioners. • Gamer survey data collected by CTEC and Take This. • Developer interview data collected by CTEC and Take This. • Community data collected by CTEC and Take This.
03	Activities	<ul style="list-style-type: none"> • Survey, Data Collection, and Analysis Phase • Narrative and Game Design Workshop Series • Multiplayer Design Workshop Series • Policymaker Workshop Series • Developer Toolboxes and Collaborative Framework Development
04	Outputs	<ul style="list-style-type: none"> • 8 developer-focused workshops completed with 30 participants at each. • 2 private-public roundtable events held. • 2 toolboxes for trust and safety methods produced and promoted. • Framework for public/private collaboration on games-based extremism produced. • 2 research papers on large-scale extremist social networking in games communities published. • 2 research papers on results from surveys published.
05	Short-Term Outcomes	<ul style="list-style-type: none"> • Increased knowledge of extremism, moderation best practices, and potential pitfalls among developer participants. • Increased awareness of the particular unique aspects of games-based radicalization among public/private workshop participants. • Contributions to academic and policy work on games-based extremism. • Adoption of moderation best practices at at least 2 developers.
06	Long-Term Outcomes	<ul style="list-style-type: none"> • Improved resilience to extremist exploitation across the games industry. • Improved collaborative efforts between public and private stakeholders on disrupting extremist networks in games. • Capacity to scale up program implementation and toolbox adoption across more of the games industry.
06	Likelihood of Success	<ul style="list-style-type: none"> • By emphasizing capacity building, public/private collaborations, and more flexible methodologies, this program will be successful in its goal of increasing resilience to extremist activity in games and building skills among developers to anticipate future risks before they are exploited.

3. Organizations and Key Personnel

The team will be composed of experts from CTEC, Take This, and Logically. CTEC will lead project management and research development, and it will directly coordinate development of the workshops and toolboxes. CTEC staff will also supervise the development and publication of the team's research. Take This will leverage its world-renowned expertise in the psychology, sociology, and culture of games and will manage developer interviews, partnerships with game developers, and the creation and execution of survey-based research products. Logically will use its industry-leading social media monitoring and data science resources to supervise scaled analysis, using internal experts and tools to collect and analyze large-scale data from games communities. Logically will also assist CTEC in facilitating government participation in project activities.

CTEC: The Center on Terrorism, Extremism, and Counter-Terrorism (CTEC) will serve as the lead organization on the project.

CTEC was founded by Middlebury Institute of International Studies (MIIS) faculty in 2018 to deliver research and education programs that inform private sector, government, and multilateral institutions' understanding of and responses to the terrorism threat. At CTEC, world-renowned faculty collaborate with and train graduate student researchers to evaluate current threats in radicalization, recruitment, and domestic violent extremism (DVE). CTEC analysts use mixed-methods research practices across the fields of policy, data science, and linguistics, to assist clients and decision-makers more broadly in preventing DVE. The Center's extensive research into terrorist use of the Internet has enhanced the understanding of extremist messaging, recruitment tactics, and fundraising online. CTEC's parent institution, MIIS, has a long history of winning and managing large grants from both public and private organizations. CTEC and MIIS have won and administered grants funded by Department of Homeland Security, Department of State, and foreign governments such as the United Kingdom, Germany, Austria, Japan, and others.

The CTEC team will be led by Deputy Director Alex Newhouse, who is a specialist in online extremism and a data scientist with years of experience in collecting and analyzing social media data for disrupting extremist activity. He will lead development of detection, monitoring, and disruption research, best practices for front-line practitioners at game developers, and qualitative propaganda and communications research. Alex has extensive knowledge and practical experience analyzing right-wing extremism, religious fundamentalism, online extremism and propaganda. Alex has a passion for video games and first-hand experience working for large video game corporations such as Playstation. This passion has intermingled with his drive and motivation to deter radicalization from gaining footholds in some of the most vulnerable online communities.

Alex will be supported by CTEC's Research Lead for Digital Extremism Robin O'Lunaigh and Digital Researcher Enrique Nusi. Robin is an experienced extremism researcher with extensive familiarity with open-source methods and analyzing online ecosystems. Enrique is an extremism-focused data analyst who builds tools, collects data, and produces analysis to support CTEC's mixed-

methods approach. Together, Robin and Enrique will provide significant resources for long-term and cross-platform community analyses that CTEC will perform in this project.

Take This: Take This is a mental health advocacy organization with a focus on the game industry and community. They provide resources, training, and support for individuals and companies that help the gaming community improve its mental well-being and resilience. The organization addresses the underlying conditions that can create and perpetuate mental health challenges: stigma, harmful studio culture, harassment and toxicity, lack of diversity and accessibility, and problematic game and community design. As experts in applied social, cultural, and psychological research of games communities, Take This staff will lead efforts to understand gamer mentalities, identities, and behavior. Take This is also well-established in the games industry as a leading organization on gamer safety, and it will supervise development of relationships to game developers.

The Take This team will be led by Rachel Kowert, Ph.D, who is a research psychologist and the Research Director of Take This. She is a world-renowned researcher on the uses and effects of digital games, including their impact on physical, social, and psychological well-being. An award-winning author, she has published a variety of books and scientific articles relating to the psychology of games and, more recently, the relationship between games and mental health specifically. Her published works include peer-reviewed books such as *Video Game Debate*, *Video Game Debate 2*, and *Video Games and Well-being: Press Start*, as well as community-focused books such as *A Parent's Guide to Video Games*, and *Pragmatic Princess*. Recently, she founded her YouTube channel *Psychgeist*, which serves to bridge the gap between moral panic and scientific knowledge on a variety of psychology and game-related topics. Dr. Kowert has been featured in various media outlets, including NPR, the Wall Street Journal, the Atlantic, Wired, and video game publications such as Kotaku and Polygon.

Logically: Logically is a technology company combining advanced artificial intelligence with human expertise to tackle harmful and problematic online content at scale. It aims to provide everyone, from individual citizens to national governments, with the tools to identify and disarm damaging and misleading information. Logically will apply its industry-leading expertise and internal tools in information disorder and social media research to lead the project's efforts on understanding scaled community development, social network dynamics, and identity creation within gaming ecosystems.

(b)(6)

(b)(6)

Please see resumes/CVs in the Appendix.

4. Sustainability

The core deliverables of this project—the workshops, the toolboxes, and the foundational research—are designed to be used and applied at scale far beyond the project period. CTEC, Take This, and Logically will develop our products with the explicit end goal of sharing them to the industry and public-sector stakeholders broadly. As a result, we anticipate our project having an impact far beyond its two-year period of performance.

To bolster its sustainability, we will also continue to build relationships with game developers to establish longer-term engagements for consistent training. We will work with collaborative entities like the Electronic Software Association and Fair Play Alliance to create long-term relationships and foster skills and knowledge development programs for community managers and game designers. Finally, the team will work to acquire additional sponsors to continue activities like the public-private partnership network beyond two years.

By combining innovative scaled analysis, in-depth extremism prevention work, and capacity building for the video game community, this project is representative of the core missions of all three project partners. CTEC, Take This, and Logically are committed to follow-on research and dissemination of our products from this project, and we will permanently incorporate support of this project’s goals into our organizations.

5. Budget Detail and Narrative

Budget Category	Federal Request
Personnel	\$122,941
Fringe Benefits	\$44,259
Travel	\$10,984
Contractual	\$440,000
Other Direct Costs	\$42,200
<i>Total Direct Costs</i>	\$660,384
Indirect Costs	\$39,379
TOTAL PROJECT COSTS	\$699,763

(b)(4)

(b)(4)

Contracts - \$440,000. Two-year subawards a) Take This, Inc. and b) Logically, Ltd. (see below).

Travel - \$10,984. CTEC staff work remotely from multiple locations (not all in Monterey, CA)

- Two CTEC staff trips to San Francisco, CA, to run in-person workshops with Bay Area video game developers and partners. Flights are estimated at \$500 roundtrip per year, and lodging and M&IE use GSA rates (3 nights, 4 days) for San Francisco.
- Two CTEC staff trips to Montreal, Canada, to work and run in-person workshops with Seattle-area video game developers and partners. Flights are estimated at \$500 roundtrip per year, and lodging and M&IE (3 nights, 4 days) use State Department rates for Montreal.
- Two CTEC staff trips to Washington, D.C., to collaborate with policymakers and run in-person public-private roundtable sessions. Flights are estimated at \$500 roundtrip per year, and lodging and M&IE (3 nights, 4 days) use GSA rates for Washington, DC.

Other Direct Costs: Workshop materials at \$1.00 x 100 participants per year (\$200). Workshop food and beverages estimated at \$40 x 100 participants x 6 days in Year 1 and \$20 x 100 participants x 6 days in Year 2 (\$36,000). Workshop venue rental and AV costs estimated at \$3,000 per year.

Indirect costs calculated at 29.4% of salaries and wages for off-campus staff and 54% of wages for students.

Subaward 1: Take This

Budget Category	Federal Request
Personnel	\$189,648
Travel	\$10,352
<i>Total Direct Costs</i>	\$200,000
Indirect Costs	\$20,000
TOTAL PROJECT COSTS	\$220,000

(b)(4); (b)(6)

Travel costs for the workshops account for travel to and from Ottawa, BC, Canada for Dr. Kowert, and for the research assistant (to be hired).

Travel - \$10,352. Travel will cover six total trips:

- Two staff trips to San Francisco, CA, to work and run in-person workshops with Bay Area video game developers and partners. Flights are estimated at \$500 roundtrip per year, and lodging and M&IE use GSA rates.
- Two staff trips to Montreal, Canada, to work and run in-person workshops with Seattle-area video game developers and partners. Flights are estimated at \$500 roundtrip per year, and lodging and M&IE use State Department rates.
- Two staff trips to Washington, D.C., to collaborate with policymakers and run in-person public-private roundtable sessions. Flights are estimated at \$500 roundtrip per year, and lodging and M&IE use GSA rates.

Overhead costs for Take This are allocated using the de minimus rate of 10%.

Subaward 2: Logically

Personnel	131,765
Fringe Benefits	13,176
Other Direct Costs	61,883
Total Direct charges	206,824
<i>Total Indirect costs</i>	13,176
Total Project Cost	220,000

The Logically Ltd. (Logically) will assign four (4) employees to complete work on our proposed effort. These four employees collectively hold positions as *subject expert, head of data science, senior analyst, and analyst* inside of our company. All of the employees assigned to this effort are based in the Arlington, VA local area, at Logically’s U.S.-based office.

(b)(4); (b)(6)

Fringe Benefits: Logically estimates a fringe rate of 10% for this effort that accounts for and

incorporates benefits it provides to all employees including a company pension, annual leave, and remote work allowances.

Logically Intelligence Software Licenses and Support: For this effort, Logically estimates that it will leverage its Intelligence tool for large-scale research and support cost will be

(b)(4)

Indirect/Overhead/SG&A Rate: Logically's estimated, cumulative indirect overhead, general, and administrative rate for this effort is estimated at \$13,176. Logically has never had a NICRA and as such may request indirect costs of *up to 10%* of the modified total direct costs as defined in 2 CFR 200.68.

Endnotes

¹ Miller, C. & Silva, S. (2021). Extremists using video-game chats to spread hate. BBC News. Retrieved from <https://www.bbc.com/news/technology-58600181>

² Institute for Strategic Dialogue (2021). Gaming and Extremism: The Extreme Right on Discord, Retrieved from <https://www.isdglobal.org/isd-publications/gaming-and-extremism-the-extreme-right-on-discord/>

³ D'Anastasio, C. (2021). How Roblox Became a Playground for Virtual Fascists. *Wired*. Retrieved from <https://www.wired.com/story/roblox-online-games-irl-fascism-roman-empire/>

⁴ Winslow, J. (2022). Mass shooting apparently planned on Discord, streamed on Twitch, investigated as a hate crime. *Kotaku*. Retrieved from <https://kotaku.com/twitch-discord-4chan-shooting-buffalo-tops-jimboboi-m-1848927240>

⁵ Townsend, M. (2021). How far right uses video games and tech to lure and radicalise teenage recruits. *The Guardian*. Retrieved from <https://www.theguardian.com/world/2021/feb/14/how-far-right-uses-video-games-tech-lure-radicalise-teenage-recruits-white-supremacists>

⁶ Kowert, R. & Newhouse, A. (2022). The landscape of extremist behaviors in games. *Games Developer Conference (GDC)*. San Francisco, CA.

⁷ D'Anastasio, C. (2021). How Roblox Became a Playground for Virtual Fascists. *Wired*. Retrieved from <https://www.wired.com/story/roblox-online-games-irl-fascism-roman-empire/>

⁸ Romano, A. (2019). How the Christchurch shooter used memes to spread hate. *Vox*. Retrieved from <https://www.vox.com/culture/2019/3/16/18266930/christchurch-shooter-manifesto-memes-subscribe-to-pewdiepie>

⁹ Kingdon, A. (2019). Framing Far Cry 5: The gamification of white separatist propaganda. *Center for the Analysis of the Radical Right*. Retrieved from <https://www.radicalrightanalysis.com/2019/12/16/framing-far-cry-5-the-gamification-of-white-separatist-propaganda/>

¹⁰ Newzoo (2021). Newzoo Global Games Market Report. Retrieved from <https://newzoo.com/insights/trend-reports/newzoo-global-games-market-report-2021-free-version>

¹¹ Statista. (2021). Number of video gamers worldwide in 2021, by region. Retrieved from <https://www.statista.com/statistics/293304/number-video-gamers/ideo-gamers/>

OTVTP Implementation & Measurement Plan

Organization Name	President and Fellows of Middlebury College: Center on Terrorism, Extremism, and Counterterrorism; Take This, Inc.; Logically, Ltd.
Project Title	Disrupting Video Games-Based Radicalization Through Collaborative Cross-Sector Networks
Grant Number	EMW-2022-GR-APP-00036
Grant Implementation Period:	October 1, 2022 – September 30, 2024

Project Goal Statement

This program will develop a series of workshops and toolboxes that (i) establish a strong baseline for understanding the unique characteristics of extremist activity within video game communities, (ii) build capacity within game developers for game designers and frontline workers like community managers for preventing and countering violent extremism, and (iii) create collaborative networks across public and private sectors. The Center on Terrorism, Extremism, and Counterterrorism (CTEC) at the Middlebury Institute of International Studies, Take This, Inc., and Logically, Ltd., will develop these programs to facilitate greater resilience within the games industry to extremist exploitation.

Target Population

The games industry is composed of thousands of employees and hundreds of companies throughout the world, although exact counts are not available. While big, the games industry is dwarfed by the number of gamers, which is estimated at over 3 billion worldwide. The biggest games in the world, such as Minecraft, Among Us, and Roblox, can number in the hundreds of millions of players each. This project will work closely with game developers, frontline community practitioners, and government stakeholders to help improve developer capacity for understanding and preventing violent extremist activity within their communities. We will partner with developers who work on a diverse array of games with varied gaming communities, and our project is designed to scale to the industry at large.

Goal 1: Create a baseline of knowledge about the scope, characteristics, and indicators of video games-based extremist exploitation.

Goal 1 IMPLEMENTATION PLAN

Objectives	Activity	Inputs/Resources	Time Frame	Anticipated Outputs
<p><i>Objective 1.1: Launch and complete surveys to statistically characterize the prevalence of extremist activity and identity within games.</i></p>	<p><i>Activity 1.1.1: Dark Participation Survey.</i></p>	<p>The project team will use hours allotted to foundational research to build, run, and analyze results from a survey designed to measure “dark participation” patterns among games. Core resource is a group of participants, engaged with via crowdsourcing platform or via collaboration with developers to deliver surveys directly to gamers.</p>	<p>Q4 2022- Q1 2023 (Oct 1, 2022 – Mar 31, 2023)</p>	<p>Statistically robust results revealing the prevalence of dark participation patterns among a representative group of gamers, presented in a paper and used to inform developer workshops and toolboxes.</p>
	<p><i>Activity 1.1.2: Identity Fusion Survey.</i></p>	<p>The project team will use hours allotted to foundational research to build, run, and analyze results from a survey designed to measure the extent of identity fusion within games communities. Core resource is a group of participants, engaged with via crowdsourcing platform or via collaboration with developers to deliver surveys directly to gamers.</p>	<p>Q4 2022- Q1 2023 (Oct 1, 2022 – Mar 31, 2023)</p>	<p>Statistically robust results revealing the prevalence of identity fusion and psychological characteristics among a representative group of gamers, presented in a paper and used to inform developer workshops and toolboxes.</p>
<p><i>Objective 1.2: Interview employees of game developers to gather first-hand accounts of awareness of and engagement with games-based extremism.</i></p>	<p><i>Activity 1.2.1: Interviews with narrative designers.</i></p>	<p>The project team will engage directly with game designers to get first-hand perspectives on extremism within games. For designers, this will be used to gauge awareness and conceptualization of the issues.</p>	<p>Q1 2023 – Q2 2023 (Jan 1 – Jun 30, 2023)</p>	<p>Qualitatively rich vignettes and extractable data, such as general awareness of extremist issues, challenges faced by designers, and any design practices that have already developed to disrupt extremism.</p>
	<p><i>Activity 1.2.2: Interviews with trust and safety/community managers.</i></p>	<p>The project team will engage directly with community managers and trust and safety</p>	<p>Q1 2023 – Q2 2023 (Jan 1 –</p>	<p>Qualitatively rich vignettes and extractable data, such as general awareness of</p>

Objectives	Activity	Inputs/Resources	Time Frame	Anticipated Outputs
		practitioners to get first-hand perspectives on extremism within games. For these frontline employees, this will be used to understand challenges faced, general awareness of the unique elements of violent extremism, and any practices developed.	Jun 30, 2023)	extremist issues, challenges faced by community managers, and any trust and safety practices that have already developed to disrupt extremism.
<i>Objective 1.3: Perform scaled and qualitative analysis of games communities to understand how they are facilitated for identity creation, mobilization, and propagandizing.</i>	<i>Activity 1.3.1: Community analysis.</i>	The project team will use hours allotted to foundational research and internal tools (especially Logically Intelligence) to analyze video game community data at scale, with a particular emphasis on the intersection points of video game communities with extremist networks.	Q1 2023 – Q4 2023 (Jan 1 – Sep 31, 2023)	Unprecedented insight into how extremists use gaming platforms to generate identity, spread propaganda, mobilize, and organize. Findings will be used to develop game design toolboxes and will be published in academic papers.
	<i>Activity 1.3.2: Media and propaganda research.</i>	The project team will use hours allotted to foundational research and internal tools to do in-depth research on how video game lore, narrative, and aesthetics have been adopted and remixed for use in extremist propaganda. This work will be based on both case study and scaled analysis research.	Q1 2023 – Q4 2023 (Jan 1 – Sep 31, 2023)	Historical and longitudinal analysis on how games are exploited for propaganda and radicalization, which will inform toolboxes build for consumption by narrative and lore designers.

Goal 1 MEASUREMENT PLAN

Activity #	Performance Measures & Targets	Data Collection Method and Timeframe
Activity 1.1.1: Dark Participation Survey	Surveys are built and deployed to participants. Statistically representative groups of participants are acquired and engage with the surveys. At least 300 people complete each proposal. Robust statistical analysis is completed and gives the project team a strong baseline of how games communities engage with extreme activity and identities.	Data will be collected using a survey platform such as Mechanical Turk, Google Forms, or Qualtrics. Surveys will be delivered to participants using either crowdsourcing (via Mechanical Turk) or through direct delivery to gamers via collaboration with video game developer partners. Surveys will be launched by the end of Q4 2022, and data collection and analysis will be finished, and a report written by the end of Q1 2023.
Activity 1.1.2: Identity Fusion Survey		
Activity 1.2.1: Interviews with narrative designers	Directly engage with people across video game developers who work on narrative and lore design in games. Complete at least 20 interviews and extract data from the transcripts for them.	Interviews will be recorded and transcribed; qualitative coding techniques will be applied in order to extract and aggregate findings from the interviews. Interviews will be completed and analyzed by end of Q2 2023.
Activity 1.2.2: Interviews with community managers and trust and safety practitioners	Directly engage with people across video game developers who work on trust and safety and community management within games. Complete at least 20 interviews and extract data from the transcripts for them.	Interviews will be recorded and transcribed; qualitative coding techniques will be applied in order to extract and aggregate findings from the interviews. Interviews will be completed and analyzed by end of Q2 2023.
Activity 1.3.1: Community analysis	Gather and analyze large-scale social data across at least 2 years from at least 5 video game platforms. Use Logically Intelligence to track information contagion, extremist narratives, and mobilizing activity. Visualize and characterize hardened extremist networks on games platforms.	Data will be collected using mixed methods, including scaled data mining techniques, use of existing data leaks and archives, and Logically’s existing data assets. Analysis will be conducted using natural language processing and social network analysis techniques. Collection and analysis will be completed and written up in a report by the end of Q4 2023.
Activity 1.3.2: Media and Propaganda Research	Perform in-depth historical research on the development of propaganda and communities’ identities using game aesthetics, lore, and mechanics.	Data will be collected through scaled data mining techniques as well as manual open-source investigations. Research will be completed and written into a report by the end of Q4 2023.

Goal 2: Strengthen resilience and capacity among game developers, especially designers and community managers, to the exploitation of their games by violent extremist networks.

Objectives	Activity	Inputs/Resources	Time Frame	Anticipated Outputs
<p><i>Objective 2.1: Develop and run a series of workshops to engage with narrative and mechanics designers to build capacity for preventing and disrupting games-based extremism.</i></p>	<p><i>Activity 2.1.1: Workshop series with narrative designers.</i></p>	<p>Based on the findings from the foundational research, surveys, and interviews, the project team will develop a series of workshops to engage with narrative designers across the games industry. We will gather volunteers among employees at game developer partners.</p>	<p>Q3 2023 – Q3 2024 (July 1, 2023 – Sep 31, 2024)</p>	<p>3 workshops per year (2 virtual and 1 in person), with an estimated 100 participants for virtual workshops and 30 for in-person workshops. Participants will be asked to fill out feedback surveys to gauge increased awareness of extremist activity in games and potential solutions.</p>
	<p><i>Activity 2.1.2: Workshop series with mechanics designers.</i></p>	<p>Based on the findings from the foundational research, surveys, and interviews, the project team will develop a series of workshops to engage with mechanics designers across the games industry. We will gather volunteers among employees at game developer partners.</p>	<p>Q3 2023 – Q3 2024 (July 1, 2023 – Sep 31, 2024)</p>	<p>3 workshops per year (2 virtual and 1 in person), with an estimated 100 participants for virtual workshops and 30 for in-person workshops. Participants will be asked to fill out feedback surveys to gauge increased awareness of extremist activity in games and potential solutions.</p>
<p><i>Objective 2.2: Develop and run a series of workshops to engage multiplayer designers and community managers to build capacity for disrupting extremist</i></p>	<p><i>Activity 2.2.1: Workshop series with multiplayer designers.</i></p>	<p>Based on the findings from the foundational research, surveys, and interviews, the project team will develop a series of workshops to engage with multiplayer designers across the games industry. We will gather volunteers among employees at game developer partners.</p>	<p>Q3 2023 – Q3 2024 (July 1, 2023 – Sep 31, 2024)</p>	<p>3 workshops per year (2 virtual and 1 in person), with an estimated 100 participants for virtual workshops and 30 for in-person workshops. Participants will be asked to fill out feedback surveys to gauge increased awareness of extremist</p>

Objectives	Activity	Inputs/Resources	Time Frame	Anticipated Outputs
<i>mobilizing and radicalization activities in games.</i>				activity in games and potential solutions.
	<i>Activity 2.2.2: Workshop series with community managers and trust and safety practitioners.</i>	Based on the findings from the foundational research, surveys, and interviews, the project team will develop a series of workshops to engage with trust and safety practitioners across the games industry. We will gather volunteers among employees at game developer partners.	Q3 2023 – Q3 2024 (July 1, 2023 – Sep 31, 2024)	3 workshops per year (2 virtual and 1 in person), with an estimated 100 participants for virtual workshops and 30 for in-person workshops. Participants will be asked to fill out feedback surveys to gauge increased awareness of extremist activity in games and potential solutions.

Activity #	Performance Measures & Targets	Data Collection Method and Timeframe
Activity 2.1.1: <i>Workshop series with narrative designers</i>	For all workshops, at least 30 participants for each in-person session and 100 for each virtual session. Increased awareness among participants to the nature of extremist exploitation in games and best practices for disrupting it.	Assessment data will be collected via survey platform. Sessions will be led by project teams. These sessions will take place (3 per year for each series) between Q3 2023 and Q3 2024.
Activity 2.1.2: <i>Workshop series with mechanics designers</i>		
Activity 2.2.1: <i>Workshop series with multiplayer designers</i>		
Activity 2.2.2: <i>Workshop series with community managers and trust and safety practitioners</i>		

Goal 3: Facilitate effective policy, regulation, and enforcement from government officials by establishing public-private partnership roundtables.

Objectives	Activity	Inputs/Resources	Time Frame	Anticipated Outputs
<i>Objective 1.1: Develop a collaborative workshop series to improve public/private cooperation for the</i>	<i>Activity 1.1.1: Workshop series with public and private participants.</i>	Based on foundational research, the project team will create a series of workshops for public-private collaboration. These workshops will require participation from both game developers and government	Q3 2023 – Q3 2024 (July 1, 2023 – Sep 31, 2024)	1 workshop per year with 50 participants at each, in-person (in Washington, D.C.). Participants will engage with the project team to provide feedback for the creation of a shared

Objectives	Activity	Inputs/Resources	Time Frame	Anticipated Outputs
<i>prevention of games-based extremism.</i>		stakeholders, facilitated by the project team's relationships with industry networks like the ESA.		framework for sustainable public/private collaboration.

Activity #	Performance Measures & Targets	Data Collection Method and Timeframe
Activity 3.1.1: Workshop series with public and private participants	Each session will have 50 participants (split evenly between public and private organizations). Improved understanding of productive collaboration on disrupting extremist content.	Assessment data will be collected via survey platform. Sessions will be led by project teams. These sessions will take place (1 per year) between Q3 2023 and Q3 2024.

Goal 4: Improve P/CVE skills, including monitoring, detection, and disruption of extremist networks and responsible video game design, at scale across the video game industry.

Objective 4.1: Create toolboxes for game designers and practitioners.

Objective 4.2: Public-sector oriented manual for how to engage with the games industry and understand the unique elements of gaming communities

Objectives	Activity	Inputs/Resources	Time Frame	Anticipated Outputs
<i>Objective 4.1: Create innovative toolboxes for game developers to improve capacity</i>	<i>Activity 4.1.1: Toolbox for game designers.</i>	Based on the foundational research and feedback from the workshops, the project team will create a toolbox for game designers to use as a reference	Q2 2024- Q3 2024 (Apr 1, 2024 – Sep 31, 2024)	A standardized toolbox composed of vignettes, case studies, resources, and skills development information to help game

Objectives	Activity	Inputs/Resources	Time Frame	Anticipated Outputs
<p><i>for disrupting games-based extremism.</i></p>		<p>guide to build resilience toward extremist exploitation. This toolbox will include case studies of past exploitative activities; best practices; resources for additional dialogue and inquiries; and resources to continue education.</p>		<p>designers navigate potential risks within game design to extremist exploitation.</p>
	<p><i>Activity 4.1.2: Toolbox for trust and safety practitioners.</i></p>	<p>Based on the foundational research and feedback from the workshops, the project team will create a toolbox for trust and safety practitioners to use as a reference guide to build resilience toward extremist exploitation. This toolbox will include operational intelligence; skills information, such as social network-based content moderation; and indicator schema that can be immediately deployed.</p>	<p>Q2 2024- Q3 2024 (Apr 1, 2024 – Sep 31, 2024)</p>	<p>A standardized toolbox composed of vignettes, case studies, resources, and skills development information to help trust and safety professionals within the games industry improve capacity for disrupting extremist activity.</p>
<p><i>Objective 4.2: Provide guide for facilitating public/private partnerships on games-based extremism.</i></p>	<p><i>Activity 4.2.1: Manual containing best practices and foundational knowledge for public/private collaboration.</i></p>	<p>Based on the foundational research and feedback from the workshops, the project team will create a manual that can be used by stakeholders to guide continued engagement across public and private sectors.</p>	<p>Q2 2024- Q3 2024 (Apr 1, 2024 – Sep 31, 2024)</p>	<p>A standardized guide to building out collaborative networks for the specific purpose of tackling games-based extremism at both the public and the private levels.</p>

Activity #	Performance Measures & Targets	Data Collection Method and Timeframe
Activity 4.1.1: Toolbox for game designers	One toolbox composed of vignettes, case studies, operational information, best practices, and tutorials directed toward game designers to help them build resilience to vulnerabilities and risks in game design.	Toolboxes will be based on foundational research and workshop feedback and will be completed by the end of Q3 2024.
Activity 4.1.2: Toolbox for trust and safety practitioners	One toolbox composed of operational intelligence and tutorials, including indicator glossaries, data-driven reports, and novel moderation methods such as social network-based moderation.	Toolboxes will be based on foundational research and workshop feedback and will be completed by the end of Q3 2024.
Activity 4.2.1: Manual containing best practices and foundational knowledge for public/private collaboration.	One reference guide for sustaining public/private collaboration on preventing games-based extremism.	The guide will be based on foundational research and workshop feedback and will be completed by the end of Q3 2024.

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of the Freedom of Information and Privacy Act

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of the Freedom of Information and Privacy Act

May 16, 2022

Dear Grant Review Committee:

I am submitting this letter in support of the Center on Terrorism, Extremism, and Counterterrorism (CTEC) at the Middlebury Institute of International Studies at Monterey (MIIS). CTEC is a thriving academic center that was founded around precisely the type of actionable research and outreach proposed within their DHS grant application. CTEC has established itself as a reputable center where research and programming is focused in the areas where there is the greatest potential for progress in preventing and countering extremist violence and the subcultures, tactics, and propaganda leveraged in support of it. By addressing the unique vulnerabilities within gaming communities while leveraging their unique expertise and partnerships with Take This and Logically AI, CTEC is fully addressing both the specialized analysis required for gaming communities and the essential training of games developers and trust and safety professionals.

Since its founding, CTEC has supported technology companies with careful sampling and analysis across platforms while building specialized expertise in established and emerging high-risk terminology related to radicalization into contemporary violent extremist groups and movements. CTEC has actively applied its extensive data sets of high-risk terminology to support multiple partners, including Spectrum Labs, in evaluating and mitigating hateful, radicalizing discourse.

Since its inaugural research project, CTEC has recruited and cultivated a community of analysts with expertise in gaming subcultures, as this precise knowledge is crucial to identifying and analyzing in-group language within both extremist and extremist-adjacent communities. Gaming communities have been leveraged for extremist purposes in diverse ways, and they continue to be at high risk for violent extremist (VE) exploitation.

CTEC is uniquely situated within not only a graduate school where policy and language professionals matriculate from across the globe, but also within the larger Middlebury system that is known for its academic excellence and language expertise. Research at CTEC is supported by world-class analysts, academics, and students within a larger educational system that has created generations of professionals who have served in diverse roles within international security.

CTEC has worked with Spectrum Labs in multiple capacities as an essential partner that provides invaluable research, analysis, language expertise, and online behavioral alignment, all of which is required to build effective artificial intelligence detection models. Both the depth and breadth of CTEC's experience make it unique among small academic research centers.

In summary, among academic research centers, CTEC is a standout in its resources, expertise, and partnerships.

Best regards,

(b)(6)

Kris McGuffie

(b)(6)

Research Director, Spectrum Labs

EMW-2022-GR-APP-00036

Application Information

Application Number: EMW-2022-GR-APP-00036

Funding Opportunity Name: Fiscal Year (FY) 2022 Targeted Violence and Terrorism Prevention (TVTP)

Funding Opportunity Number: DHS-22-TTP-132-00-01

Application Status: Pending Review

Applicant Information

Legal Name: President and Fellows of Middlebury College

Organization ID: 22489

Type: Private Institutions of Higher Education

Division:

Department:

EIN(b)(6)

EIN Shared With Organizations:

DUNS: 020651675

DUNS 4: 0000

Congressional District: Congressional District 00, VT

Physical Address

Address Line 1: Old Chapel Road

Address Line 2: [Grantee Organization > Physical Address > Address 2]

City: Middlebury

State: Vermont

Province:

Zip: 05753-[Grantee Organization > Physical Address > Zip 4]

Country: UNITED STATES

Mailing Address

Address Line 1: Old Chapel Road

Address Line 2: [Grantee Organization > Mailing Address > Address 2]

City: Middlebury

State: Vermont

Province:

Zip: 05753-[Grantee Organization > Mailing Address > Zip 4]

Country: UNITED STATES

SF-424 Information

Project Information

Project Title: Disrupting Video Games-Based Radicalization Through Collaborative Cross-Sector Networks (Innovation Track)

Program/Project Congressional Districts: Congressional District 20, CA

Proposed Start Date: Sat Oct 01 00:00:00 GMT 2022

Proposed End Date: Mon Sep 30 00:00:00 GMT 2024

Areas Affected by Project (Cities, Counties, States, etc.): Multiple

Estimated Funding

Funding Source	Estimated Funding (\$)
Federal Funding	\$699763
Applicant Funding	\$0
State Funding	\$0
Local Funding	\$0
Other Funding	\$0
Program Income Funding	\$0
Total Funding	\$699763

Is application subject to review by state under the Executive Order 12373 process? Program is not covered by E.O. 12372.

Is applicant delinquent on any federal debt? false

Contacts

Contact Name	Email	Primary Phone Number	Contact Types
Alex Newhouse	(b)(6)		Secondary Contact
Meghan Rasmussen			Primary Contact Authorized Official Signatory Authority

SF-424A

Budget Information for Non-Construction Programs

Grant Program: Targeted Violence and Terrorism Prevention Grant Program

CFDA Number: 97.132

Budget Object Class	Amount
Personnel	\$122941
Fringe Benefits	\$44259
Travel	\$10984
Equipment	\$0
Supplies	\$0
Contractual	\$440000
Construction	\$0
Other	\$42200
Indirect Charges	\$39379
Non-Federal Resources	Amount
Applicant	\$0
State	\$0
Other	\$42200
Income	Amount
Program Income	\$0

How are you requesting to use this Program Income? [\$budget.programIncomeType]

Direct Charges Explanation:

Indirect Charges explanation:

Forecasted Cash Needs (Optional)

	First Quarter	Second Quarter	Third Quarter	Fourth Quarter
Federal	\$	\$	\$	\$
Non-Federal	\$	\$	\$	\$

Future Funding Periods (Years) (Optional)

First	Second	Third	Fourth
\$	\$	\$	\$

Remarks:

SF-424C

Budget Information for Construction Programs

Assurances for Non-Construction Programs

Form not applicable? false

Signatory Authority Name: Meghan Rasmussen

Signed Date: Tue May 17 21:07:00 GMT 2022

Signatory Authority Title: Director of Sponsored Programs

Certification Regarding Lobbying

Form not applicable? false

Signatory Authority Name: Meghan Rasmussen

Signed Date: Tue May 17 00:00:00 GMT 2022

Signatory Authority Title: Director of Sponsored Programs

Disclosure of Lobbying Activities

Form not applicable? true

Signatory Authority Name: Meghan Rasmussen

Signed Date:

Signatory Authority Title:

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

*** APPLICANT'S ORGANIZATION**

President and Fellows of Middlebury College

*** PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE**

Prefix: * First Name: Middle Name:

* Last Name: Suffix:

* Title:

* SIGNATURE:

* DATE: