

Recommendations for Addressing Nation-State Threats to the US Homeland



The National Homeland Security Consortium (NHSC) met on February 5, 2025, in Alexandria, Virginia to discuss the evolving nation-state threat and to identify recommendations for how the incoming Federal Emergency Management Agency (FEMA) leadership can best position the agency to support its stakeholders in confronting this threat. The nation-state threat that the US faces in this context refers to strategic military, cyber, and state-sponsored terrorist activities undertaken by rival countries to undermine national security. The primary threats that factor into this discussion are cyberattacks, support for terrorism and potential terrorist attacks within the homeland, and military aggression up to and including nuclear missile attack.

The NHSC is a forum for public and private sector disciplines to coalesce efforts and perspectives about how best to protect America in the 21st century. The Consortium consists of 22 national organizations that represent local, state, and private sector professionals. The group represents the array of professions that deliver the daily services that are vital to the safety and security of the United States.

The sponsorship of this paper by the NHSC does not imply endorsement of the findings by the individual member associations.

CHALLENGES

NHSC members identified the following challenges and outstanding questions associated with addressing the evolving nation-state threat:

- *Many private sector partners and elected officials lack an understanding of the specific nature of the nation-state threat facing the homeland, how this threat may put their communities at risk, and what specific actions they can take to prepare for this threat in a meaningful way.*
- *Coordinated planning and preparedness for response are critical elements of mitigating the impacts of any nation-state attack—whether kinetic or cyber in nature.* The National Preparedness Goal provides high-level guidance to assist communities in preventing, protecting against, mitigating, responding to, and recovering from the threats that are most relevant to them and their communities. While homeland security grants enable baseline preparedness for acts of terrorism and other large-scale risks facing the homeland, preparedness for the whole-of-government response that could be needed following a large-scale attack by a nation-state actor is not a current reality. Few local and state agencies, or private sector and elected officials, are conversant in a meaningful way in the scale of response and complex coordination that this type of attack could demand. Without significant new investments in planning and capability building, this deficit is likely to result in critical deficiencies in operational coordination, communication, resourcing, response, and recovery.
- *Formal outreach to key private sector stakeholders is limited in many jurisdictions and information-sharing is at times hampered by classification levels and access to intelligence.* These factors present challenges to broad-based public and private sector engagement on nation-state threats.
- *Significant questions remain unanswered regarding critical planning considerations:* How should the country approach resource stockpiles for key commodities which will be essential in any response (e.g., generators, IV fluids, generic drugs, maintenance parts for critical resources such as ventilators)? How will scarce resources be allocated in a national security emergency and how will competing demands be prioritized? Who has authority in a nation-state threat scenario? How will fast-moving technologies such as artificial intelligence (AI) threaten or support the response?

RECOMMENDATIONS FOR ACTION

The NHSC makes the following recommendations to FEMA to address these challenges and strengthen intergovernmental and public-private partnership in combatting nation-state threats. The NHSC stands ready to partner with and support FEMA in implementing these recommendations to ensure that all stakeholders have access to the right threat information, consequence management considerations, and capability-building frameworks necessary to create a unified and effective national approach to mitigating the risks posed by nation-states.

Increased Education and Information Sharing

Regular information sharing and education about nation-state threats and the potential consequences that must be managed in a national security emergency are essential for enhancing coordination and preparedness to effectively manage these threats. *The NHSC urges FEMA to work with the Cybersecurity and Infrastructure Security Agency (CISA) and the Office of Intelligence and Analysis (I&A) to initiate a robust engagement effort to educate its intergovernmental and private sector stakeholders regarding the nation-state threat and the consequence management dimensions of that threat. Additionally, FEMA, CISA, and I&A should share critical intelligence and planning assumptions with the right audience in a timely manner and in a format that helps inform investment actions and key decisions.*

The NHSC applauds FEMA's recent efforts to grant security clearances to state emergency management directors and other key stakeholders and recommends that these efforts be accelerated given the urgency with which we must prepare for the nation-state threat. Notably, however, a great deal of critical information can—and must—be communicated to state, local, territorial, tribal, and private sector partners at an unclassified level, if effective preparedness actions are to be undertaken.

Provide Clarity to State and Local Governments on Federal Posture and Expectations

To effectively prepare for, mitigate, respond to, and recover from a nation-state attack, all partners require a unified and coordinated awareness of their specific roles and responsibilities, particularly under varied scenarios that may alter traditional lines of authority. With the ongoing changes in the threat environment, state, local, territorial, and tribal officials must understand what to expect from the federal government; what doctrine will govern the federal response to a national security emergency; and how best to leverage its programs, resources, and expertise.

The NHSC recommends that FEMA formalize, and share through appropriate channels, federal doctrine for domestic incident response to a nation-state attack. This should include critical planning assumptions concerning the anticipated scale, scope, duration, and nature of consequences, as well as expectations for how federal support will be provided. It will be especially important to understand and communicate how lead agency authorities and responsibilities will be assigned under the National Incident Management System. This level of clarity is necessary to enable state, local, territorial, and tribal governments to plan and operate effectively with the federal government to respond to the cascading impacts that a nation-state attack can produce; and to collaborate to stabilize community lifelines and restore services.

A National Civil Preparedness Initiative for the Nation-State Threat

The consequence management dimensions of potential hybrid attacks against critical infrastructure systems could be much more severe, widespread, and prolonged than typically experienced in extreme natural disasters. At the same time, adversary influence operations designed to discredit US public

institutions will aim to sow civil discord and erode public trust. Consequence management in these environments will require a broad array of organizations to operate in often unfamiliar roles. It is, therefore, critical that these stakeholders be convened as part of a structured preparedness process to conduct discovery exercises and develop joint concepts of operations that can support effective response to a hybrid nation-state attack on the US homeland. Critical questions which must be navigated during such a process include, but are not limited to, the following:

- What are the relevant laws, authorities, and regulations at the federal level and within each state which must be leveraged to support an effective response?
- How will prioritization and allocation decisions for scarce resources be made at all levels of government?
- How can adversary information operations designed to discredit and sow distrust in US authorities be anticipated and countered?
- What federal and state capabilities will be especially critical to an effective response?

The NHSC recommends that FEMA execute a National Level Exercise (NLE) focused on preparing for a nation-state attack involving the simultaneous play of all ten FEMA Regions together with the Department of Defense, states, localities, and key private sector stakeholders. Such an exercise will help raise awareness, identify capability gaps, and reveal critical planning considerations that the nation must address to enable an effective, integrated response to a national security emergency.

Additional Opportunities

Expanded focus for mitigation efforts. State and local governments are heavily reliant on federal government funding for planning and implementation of mitigation projects. FEMA mitigation grant funds do not currently fund mitigation activities for human-caused risks. Given the severity of the risk of cyber-attacks on public works and transportation infrastructure systems, the NHSC recommends that FEMA broaden the focus of its mitigation programs to allow states and local governments to invest FEMA grant funding in mitigation projects that can address critical vulnerabilities in these public infrastructures.

Leveraging new technologies. The advancement of AI and other new technologies is accelerating rapidly. Public health, safety, and security organizations at all levels are grappling both with the new risks these advances are introducing as well as opportunities to employ these technologies to increase efficiency and improve mission outcomes. The NHSC recommends that FEMA work with CISA and the Science and Technology Directorate to provide guidance and support to partner organizations to build awareness of new risks and to identify and promulgate use cases for the employment of new technologies—and AI in particular—to improve mission delivery.

Strengthening ‘community continuity’ on a national scale. FEMA has long emphasized the critical role that individuals, families, and social capital play in fostering community resilience in the face of disasters. The potential consequence dimensions of the nation-state threat place even greater emphasis on the need for a well-prepared citizenry that is capable and willing to collectively support one another during a nation-state attack. The NHSC recommends that FEMA expand and build on prior efforts and work to foster a spirit of nationwide preparedness, not just among emergency management professionals, but among individuals and communities as well.