

**To:** Biden-Harris Agency Review Team: Cybersecurity and Infrastructure Security Agency, U.S. Department of Homeland Security  
**From:** National League of Cities  
**Re:** Policy Areas of Importance to Cities, Towns and Villages  
**Date:** January 27, 2020

As the voice of America's cities, towns and villages, representing more than 200 million people across the country, the National League of Cities (NLC) looks forward to working with the Biden-Harris Administration and with the team at the Cybersecurity and Infrastructure Security Agency. With more than 19,000 cities, towns and villages in the United States, nearly all of which have their own websites, email networks, and servers handling personal and financial information for employees, residents, and local businesses, municipal governments present an enormous attack surface for bad cyber actors. While cities are steadily increasing their own investment in hardware, software, and personnel to secure themselves, the need for financial and technical cybersecurity assistance for the local government sector is enormous.

As cities look to partner with the Administration in the first 100 days and beyond, we hope that the following areas will be taken into consideration:

#### **Direct Fiscal Relief to Cities, Towns and Villages**

Cities are the engine of our nation's economy and essential to America's economic recovery. Health and the economy perhaps have never been more closely aligned than now - as the urgency to address public health to ensure a strong economy is vital. With so many city leaders and essential workers on the front lines risking their health and safety, navigating expanding needs for health and mental health services, support and relief is needed more than ever. America's communities are hurting. As the findings of NLC's 2020 [City Fiscal Conditions report](#) reveals, America's cities are experiencing the fiscal consequences of the coronavirus pandemic-downturn at an unprecedented speed – and like recent recessions, it will take years for municipal budgets to recover from the impact of COVID-19. This effects health and well-being in communities in the long-term as well. Cities, towns and villages across our country need direct fiscal relief to communities of all sizes to ensure that essential city services and important community-anchoring programs can remain in operation.

#### **Regular Communication with Stakeholders**

Local leaders are committed to intergovernmental partnership, through federalism, requiring a cooperative partnership among local, state and federal governments that must be strengthened through all levels of government. Local leaders look forward to working collaboratively with the Biden-Harris Administration and in a manner that recognizes the importance of a federal-local partnership. As such, we hope that CISA will institute regular intergovernmental briefings, as well as ensure that local governments are at the table when rules and resources are being crafted to provide an important perspective on ensuring that they are effective, implementable, offer local flexibility, avoid a "one-size-fits-all" approach and avoid an unfunded mandate.

#### **Invest in Municipal Cybersecurity**

Local governments are highly visible and extremely visible targets. Cities responsible for everything from managing election administration to managing public health can ill-afford threats like data theft or ransomware. At the same time, local governments had limited resources to invest in cybersecurity prior to the pandemic and are now even further limited by pandemic-induced budgetary shortfalls. CISA

should prioritize establishing connections with communities before they experience an attack, and expand the scope of grants and technical assistance targeted at this sector.

CISA should also consider tailoring resources and programming more narrowly to small jurisdictions. Small cities, which represent the majority of municipalities, face the same kinds of threats as bigger cities, but without the same level of resources. The smallest communities often lack full-time staff, or rely on small teams wearing many hats to administer local functions. Federal one-size-fits all unfunded mandates or standards are impossible for these communities to manage, and standards, regulations, guidance, and resources should be developed with these communities and their capacity in mind.