Maximum Impact: Assessing the Effectiveness of the State Department's CT Programs and Charting the Path Forward

U.S. House of Representatives
Committee on Foreign Affairs
Subcommittee on the Middle East and North Africa

May 6, 2025

Testimony of Ambassador Nathan A. Sales

Chairman Lawler, Ranking Member Cherfilus-McCormick, and Members of the Subcommittee, it is a pleasure to be here today.

My name is Nathan Sales. I am the founder and principal of Fillmore Global Strategies LLC, a consultancy that provides legal and strategic advice on matters at the intersection of law, policy, and diplomacy. I am also a distinguished fellow at the Atlantic Council.

From 2017 to 2021, I served at the U.S. Department of State as the Ambassador-at-Large and Coordinator for Counterterrorism. Concurrently, I was the acting Under Secretary of State for Civilian Security, Democracy, and Human Rights, as well as the Special Presidential Envoy to the Global Coalition to Defeat ISIS. I previously served at the U.S. Department of Homeland Security as Deputy Assistant Secretary for Policy, and at the U.S. Department of Justice as Senior Counsel in the Office of Legal Policy, where I worked on counterterrorism policy. I am here as a private citizen, but my testimony is informed by my experiences working on national security and counterterrorism for the U.S. government over the course of two decades.

Today, I will begin with a brief description of the global terrorist threat landscape; I will discuss how counterterrorism can promote American strategic objectives in an era of great power competition; and I will suggest some organizational and procedural reforms to make the State Department's vital counterterrorism work even more effective.

In short, counterterrorism still matters, even at a time when Washington's primary focus is on the challenges posed by adversary states such as China, Russia, Iran, and North Korea. Counterterrorism is important because the United States and our allies continue to face a daunting array of terrorist threats, from Afghanistan to Syria and Iraq to Sub-Saharan Africa. And it is important because the counterterrorism toolkit can be used, not just to degrade and defeat terrorist groups that threaten us, but to solidify partnerships with key states and to impose costs on rivals that increasingly are turning to terror tactics to advance their malign objectives.

I.

Counterterrorism still matters for a simple reason: terrorism still matters. Indeed, today's global threat landscape is as complex and unpredictable as it has ever been. To cite just a few examples, the United States' withdrawal from Afghanistan set the stage for core al Qaeda to regroup in the country under the protection of its longstanding Taliban patrons, while ISIS and

other groups plot attacks across the region and farther afield. In Syria, we have seen a steady rise in attacks by ISIS remnants after the so-called "caliphate" was dismantled during the first Trump administration. And West Africa has become perhaps the hottest of the globe's terrorist hot spots, with dozens of groups attacking civilians with seeming impunity, destabilizing national governments, and reshaping the world's geopolitical map in the process. It remains a strategic interest of the United States to counter these threats – not primarily through the use of military force, but through the judicious use of all instruments of national power.

In Afghanistan, the U.S. withdrawal in 2021 created a security vacuum that has enabled a wide variety of terrorist groups to take root and flourish. The local ISIS affiliate – ISIS Khorasan Province, or ISIS-K – is thought to have as many as 6,000 fighters[1] and has shown an alarming capability to conduct attacks far beyond Afghanistan's borders, such as the March 2024 attack in Moscow that killed more than 140 people.[2] Meanwhile, al Qaeda has reasserted itself in Afghanistan under the Taliban's protection; the group reportedly built nine new terrorist camps in the country in 2024 alone.[3] Tehrik-e-Taliban Pakistan, better known as the "Pakistani Taliban," operates training camps alongside al Qaeda and uses Afghan territory to carry out attacks in Pakistan – a bitter irony given Islamabad's longstanding support to the Afghan Taliban.[4] Under the Taliban's misrule, Afghanistan has once again become a safe haven for terror. No fewer than 21 terrorist groups are active on its territory.[5]

In Syria and Iraq, ISIS has steadily ramped up attacks following the loss of its physical "caliphate" in 2019.[6] Last year, according to the Soufan Center, ISIS conducted about 700 attacks in Syria, an average of nearly 60 attacks per month, almost tripling its operational tempo over 2023.[7] The situation has become more volatile since the fall of Bashar al-Assad in late 2024. After a drop in ISIS activity around the new year – due in part to a series of punishing airstrikes on ISIS training camps carried out by U.S. forces after the Assad regime's collapse[8] – the group launched

---

[1] United Nations, *Thirty-Fourth Report of the Analytical Support and Sanctions Monitoring Team Submitted Pursuant to Resolution 2734 (2024) Concerning ISIL (Da'esh), Al-Qaida and Associated Individuals and Entities*, July 22, 2024, at 16, https://docs.un.org/en/S/2024/556.

[2] Shane Harris, *U.S. Told Russia that Crocus City Hall Was Possible Target of Attack*, Wash. Post, Apr. 2, 2024, https://www.washingtonpost.com/national-security/2024/04/02/us-warning-russia-isis-crocus/.

[3] Jack Detsch, *Al Qaeda Expands Its Footprint in Afghanistan*, Foreign Policy, Aug. 30, 2024, https://foreignpolicy.com/2024/08/30/al-qaeda-presence-afghanistan-taliban-resistance-panjshir-cia/.

[4] U.N., *supra* note 1, at 18.

[5] Detsch, *supra* note 3.

[6] Colin P. Clarke, *The Islamic State Is Making a Comeback*, Foreign Policy, Feb. 17, 2025, https://foreignpolicy.com/2025/02/17/islamic-state-syria-comeback-terrorism/.

[7] *The Islamic State Will Exploit the Current Situation in Syria to Its Advantage*, Soufan Center, Dec. 18, 2024, https://thesoufancenter.org/intelbrief-2024-december-18/.

[8] *U.S. Airstrikes in Syria Meant to Prevent Islamic State from Taking Power in Leadership Void*, PBS, Dec. 10, 2024, https://www.pbs.org/newshour/world/u-s-airstrikes-in-syria-meant-to-prevent-islamic-state-from-taking-power-in-leadership-void.

at least 14 attacks in the first two weeks of April 2025 alone, a fourth consecutive month of rising operations.[9]

West Africa continues to emerge as an epicenter of global terrorism.[10] Last year, the Sahel region accounted for 51 percent of global terrorism-related deaths, with the number of such deaths rising by a factor of ten since 2019. Five of the ten countries in the world most affected by terrorism are in the Sahel.[11] Al Qaeda's affiliate JNIM is particularly capable, with approximately 5,000 to 6,000 fighters across several countries, including Burkina Faso, Mali, and Niger.[12] For its part, ISIS has five highly active provinces in Africa, including ISIS Mozambique and ISIS West Africa Province. The situation in Nigeria is particularly concerning. Extremist violence in the country has targeted Christian communities, with some 200 Christians massacred ahead of Holy Week in 2025,[13] adding to the more than 52,000 Christians killed in the country since 2009 alongside 30,000 moderate, non-Fulani Muslims.[14] For good reason, some observers are calling the attacks on Nigerian Christians a genocide.

It is a vital national security interest of the United States to degrade and defeat such terrorist threats, for a number of reasons. Most importantly, to prevent deadly attacks on Americans abroad, and ultimately on the American homeland. In addition, successful terrorist attacks can spur open warfare between states, with far-reaching regional and even global consequences. (We saw this after the October 7, 2023 attack on Israel by the Iranian regime's terror proxy Hamas; today, India and Pakistan – two nuclear armed powers – are on the brink of war after an attack on Indian tourists in Kashmir.) Persistent terrorist violence can also unleash waves of migration that threaten to import security risks and upend domestic politics in destination countries, as Europe has learned in recent years (and as hostile states like Russia know all too well, as they weaponize migration to destabilize their neighbors). Finally, devoting sufficient resources to keep global terrorist threats at bay provides leaders the space they need to address other geopolitical problems. Another catastrophic, 9/11 level attack would leave policymakers with little bandwidth for the urgent challenges posed by rival states.

---

[9] Charles Lister, *ISIS Is on the Ropes in Syria*, Middle East Inst., Apr. 14, 2025, https://www.mei.edu/publications/isis-ropes-syria-successful-transition-damascus-could-deliver-knockout-blow.

[10] *Sub-Saharan Africa Remains an Epicenter of Violent Jihadist Terrorism*, Soufan Center, May 1, 2025, https://thesoufancenter.org/intelbrief-2025-May-1/.

[11] Institute for Economics & Peace, *Global Terrorism Index 2025*, at 2, https://www.economicsandpeace.org/global-terrorism-index/.

[12] U.N., *supra* note 1, at 6.

[13] *Nigeria Soaked in "Ocean of Blood", Says Bishop After Murders of 200 Christians in One Week*, Catholic Herald, Apr. 19, 2025, https://thecatholicherald.com/nigeria-soaked-in-ocean-of-blood-says-bishop-after-murders-of-200-christians-in-one-week/.

[14] Lisa Zengarini, *Over 50,000 Christians Killed in Nigeria by Islamist Extremists*, Vatican News, Apr. 17, 2023, https://www.vaticannews.va/en/church/news/2023-04/over-50000-christians-killed-in-nigeria-by-islamist-extremists.html.

II.

Counterterrorism continues to be essential to American grand strategy, even in an era of great power competition.[15] CT is a comparative advantage of the United States, and CT cooperation can cement partnerships with key states facing an array of terrorist threats, bringing them into closer alignment with Washington and detaching them from competitors such as China and Russia. Furthermore, America's rivals increasingly are using terror proxies to advance their own strategic objectives. The CT toolkit – law enforcement cooperation, intelligence sharing, aviation security, economic sanctions, and so on – is an important part of countering state-backed terror campaigns and imposing costs on our adversaries.

Consider partnerships. In the quarter century since the 9/11 terror attacks, the United States has developed, through trial and sometimes error, a suite of CT capabilities that our competitors cannot approach. Using a combination of civilian and military assistance, the United States is able to offer unparallelled CT tools to states on the front lines.

For example, the United States trains police officers, lawyers, and judges to investigate, prosecute, and adjudicate terrorism related crimes, ensuring that perpetrators are held accountable and victims receive justice. We train and equip rapid response units to suppress terrorist attacks in real time, saving innocent lives. We boost partners' ability to sanction terrorist financiers, stanching the flow of money that is the lifeblood of international terrorism. We enhance border security, curtailing terrorist travel. And we strengthen aviation security, particularly at airports with direct flights to the U.S. This assistance is not charity. It is an investment in American security. If partner nations have the tools they need to cripple terrorist threats abroad, that adds to our security here at home. And if partner nations are more aligned with the United States, they will typically be less aligned with our competitors.

Africa is an especially important region for U.S. counterterrorism assistance, not just because Africa faces a staggering array of terrorist threats, but because China sees it as central to its Belt and Road Initiative and because Russia covets the continent's mineral wealth. It bears emphasis that the United States and our African partners share the same goal: We want frontline states to be able to defend themselves on their own and not be perpetually dependent on Washington. This stands in sharp contrast to the Chinese Communist Party, whose debt-trap diplomacy creates vassals, and whose approach to economic development enriches politically connected Chinese companies far more than local communities. The American approach also is a marked departure from that of Russia, whose idea of security assistance is to dispatch Wagner mercenaries with heavy handed tactics that seem likely to produce even more terrorist radicalization and recruitment. African countries are eager to cooperate on counterterrorism, and for many the United States remains their security partner of choice. If we don't help, they will turn to our competitors – even with all their manifest flaws. They may well conclude that a flawed partner is better than no partner at all.

---

[15] *See generally* Nathan Sales, *Counterterrorism and Great-Power Competition*, Atlantic Council, Sept. 7, 2021, https://www.atlanticcouncil.org/commentary/article/counterterrorism-and-great-power-competition/.

Unfortunately, America's strategic position in West Africa has deteriorated significantly in recent years. During the previous administration, the government of Niger ended security cooperation with the United States – including forcing us to abandon our $100 million drone base at Agadez, which we had used to collect intelligence about, and apply pressure to, a range of terrorist groups active in the region, including ISIS and al Qaeda affiliates.[16] This highly regrettable development came on the heels of France being forced, beginning in 2022, to wind down its military presence in a number of West African countries where it had provided substantial counterterrorism assistance. The French presence, which had enabled American counterterrorism operations in the region, has been replaced by Russian forces arriving to fill the resulting security vacuum.[17] Restoring security cooperation in the strategically vital region of West Africa must be an urgent priority for the new administration and our European partners.

Counterterrorism also remains relevant because adversary states increasingly are turning to proxy groups to do their dirty work, and CT tools can be used to counter such methods and to impose costs on rivals. The Islamic Republic of Iran, of course, pioneered the use of terror proxies almost five decades ago and to this day it remains the most enthusiastic practitioner of this bloody style of statecraft. North Korea has followed suit,[18] and Russia likewise has ramped up its use of violent proxies – particularly after its 2022 invasion of Ukraine as the Kremlin looks to destabilize Kyiv's supporters in Europe.[19]

In particular, America's adversaries have directed organized crime syndicates, drug cartels, mercenaries, and their own intelligence services to carry out a wide variety of acts of what can only be described as terrorism. To take just a few notorious examples, they have planned and conducted assassinations of political figures, dissidents, corporate leaders, and other prominent targets, sometimes by using prohibited chemical weapons. They have attempted transnational kidnappings. They have carried out bombings and arson attacks against community centers, shopping centers, and other civilian infrastructure. They have planted explosives on cargo planes.

The counterterrorism toolkit can be an effective suite of responses to these sorts of hostile measures. Sanctions, prosecutions, and other highly visible measures can impose meaningful costs on those responsible while negating the plausible deniability that led adversary states to operate through proxies in the first place. And in the same way that adversary states will employ gray zone methods short of open armed conflict to manage escalation risk, so too the counterterrorism toolkit provides American and allied policymakers with a graduated and calibrated menu of responses that can be dialed up or down as circumstances warrant.

---

[16] *U.S. Military Completes Withdrawal from Key Drone Base in Niger*, Reuters, Aug. 5, 2024, https://www.reuters.com/world/africa/us-military-completes-withdrawal-key-drone-base-niger-2024-08-05/.

[17] *France Ends Military Presence in Sahel Region with Handover of Last Base in Chad*, France 24, Jan. 30, 2025, https://www.france24.com/en/live-news/20250130-france-hands-over-last-base-in-chad-amid-withdrawal.

[18] Robert Windrem et al., *North Korea Has a History of Assassination Attempts on Foreign Soil*, NBC News, Nov. 21, 2017, https://www.nbcnews.com/news/north-korea/north-korea-has-history-assassination-attempts-foreign-soil-n823016.

[19] Emma Burrows, *Western Officials Say Russia Is Behind a Campaign of Sabotage Across Europe*, AP, Mar. 21, 2025, https://apnews.com/article/russia-ukraine-war-europe-hybrid-campaign-d61887dd3ec6151adf354c5bd3e6273e.

III.

Let me close with several organizational and procedural suggestions that Congress and the administration might consider to make the State Department's counterterrorism work even more effective.

First, it might be worthwhile to consolidate in the Counterterrorism Bureau some of the counterterrorism-related functions and responsibilities that today are housed elsewhere in the State Department. For example, during the first Trump administration, the Office of the Special Presidential Envoy to the Global Coalition to Defeat ISIS was merged into CT Bureau, and further reorganization along these lines could be beneficial. Moving these elements to CT Bureau could result in better integration of the Department's counterterrorism efforts, create efficiencies by streamlining policymaking and operational processes, and establish a clearer chain of command – and thus accountability – on counterterrorism issues.

One example is the Rewards for Justice (RFJ) program, which offers monetary awards to tipsters who provide information leading to the arrest or conviction of certain specified terrorists.[20] The program is administered by the Bureau of Diplomatic Security (DS), but, in practice, RFJs typically piggyback on top of counterterrorism sanctions administered by CT Bureau: The evidentiary record that CT compiles and then uses to prepare a sanctions package will subsequently be used to justify an RFJ. Bringing the RFJ program into CT Bureau would ensure that awards are fully aligned with and integrated into the sanctions programs for which CT Bureau is responsible. It also would reduce wasteful duplication of effort across two separate bureaus.

A second, perhaps more complicated, example concerns the Anti-Terrorism Assistance (ATA) program, which aims to build counterterrorism capacity in key partner states. Responsibility for ATA programming is divided between CT and DS. CT is responsible for determining the program's overall strategic direction, providing the necessary funding, setting the requirements for specific capacity building programs, and monitoring and evaluating program effectiveness. For its part, DS handles the implementation of certain programs in certain countries. It might make sense to fold the DS elements into CT Bureau, to promote better coordination and feedback between program design and implementation. On the other hand, there may be some value in continuing to keep responsibility for program evaluation separate from program execution.

Next, Congress and the administration might relocate to CT Bureau elements of offices that are slated for closure, such as the Bureau of Conflict and Stabilization Operations (CSO) and the Global Engagement Center (GEC). CT would be a natural fit for CSO personnel with counterterrorism expertise, as well as experts in Middle Eastern, South Asian, and African affairs, given the prevalence of terrorism in those regions. As for the GEC, when it was originally established in 2016, its mission was to counter the online ISIS propaganda that inspired thousands of foreign terrorist fighters to stream into Iraq and Syria,[21] before mission creep led the office into the broader and more controversial issues that contributed to its disbanding in April of this year. The GEC elements that remained narrowly focused on the original mission of countering terrorist

[20] 22 U.S.C. § 2708.

[21] Exec. Order No. 13,721 (Mar. 17, 2016).

propaganda might be usefully incorporated into CT Bureau. Indeed, some consideration was given to doing so early in the first Trump administration.

Second, Congress might streamline the process of reevaluating designated Foreign Terrorist Organizations (FTOs). Under current law, CT Bureau is required to conduct a review every five years to determine whether a group that previously was designated as an FTO should remain on the list.[22] Such periodic reviews are unnecessary, as any designated groups that have renounced terror have the ability under the law to file a delisting petition.[23] Worse, the five-year reviews have a substantial opportunity cost. They consume policymaker bandwidth and other resources that might be more profitably spent imposing new sanctions on the constantly evolving universe of terrorist groups worldwide. Congress could extend the review period (e.g., to ten years) or eliminate the requirement altogether.

Third, Congress and the administration should consider changing the CT Coordinator's official title to "Assistant Secretary for Counterterrorism," adopting the standard nomenclature used by most other State Department bureaus. This would both reduce confusion and reflect changes over the years in how the U.S. government has organized to combat terrorist threats.

When the Coordinator position – now formally known as the "Coordinator for Counterterrorism [with] the Rank and Status of Ambassador at Large"[24] – was established in October 1972, the U.S. government's counterterrorism capabilities were in their infancy. The Coordinator was tasked not just with advising the Secretary of State and leading the State Department's counterterrorism efforts, but overseeing such efforts for the government as a whole; the "Coordinator" title reflects this interagency role. Today, of course, a robust counterterrorism architecture exists across the Executive Branch and the Coordinator's prior role as an interagency convener has been supplanted by others, including the NSC's Senior Director for Counterterrorism and the Director of the National Counterterrorism Center. The "Coordinator" title is a relic from another era.

In making any title changes, it strikes me as advisable to preserve the Coordinator's statutory rank and status as an Ambassador at Large, which, in my experience, has been invaluable in engaging top decisionmakers in foreign capitals. There is also the question of whether legislation is necessary to make the position an Assistant Secretary or whether this could be accomplished administratively. Congress by statute has capped the number of Assistant Secretaries of State at 24.[25] In the past, this cap has prevented the Coordinator position from being converted to an Assistant Secretary without further legislation. However, the administration's proposed reorganization of the State Department would merge or eliminate a number of bureaus, potentially freeing up authorized Assistant Secretary positions that could be allocated to CT.

---

[22] 8 U.S.C. § 1189(a)(4)(C).

[23] *Id*. § 1189(a)(4)(B).

[24] 22 U.S.C. § 2651(e)(1), (3).

[25] *Id*. § 2651(c)(1).

A **fourth** and final suggestion – one that applies not just to CT Bureau but to the entire State Department. It is advisable to maintain State's traditional role as the central hub for the distribution of all foreign assistance. Foreign assistance is an investment of taxpayer money. It is a way of translating America's foreign policy objectives into concrete and practical outcomes. As the nation's preeminent foreign policy agency, the State Department is normally in the best position to assess how a given program in a given country would (or would not) advance U.S. objectives. While other departments and agencies will and should continue to engage with their foreign counterparts and play an active role overseas, State should maintain its exclusive role in foreign assistance to ensure that resources are aligned with mission.

* * *

Mr. Chairman, Madame Ranking Member, and Members of the Subcommittee, thank you again. I look forward to your questions.