May 19, 2026

Supporting Statement for
Paperwork Reduction Act Submissions

OMB Control Number: 1660-0131

Title: Threat and Hazard Identification and Risk Assessment (THIRA) / Stakeholder Preparedness Review (SPR) Unified Reporting Tool

Form Number(s):

- **FEMA Form FF-008-FY-21-106 (formerly FEMA Forms 008-0-19 (for THIRA) and 008-0-20 (for SPR)) Threat and Hazard Identification and Risk Assessment (THIRA) / Stakeholder Preparedness Review (SPR) Unified Reporting Tool**

- **FEMA Form FF-008-FY-21-107 (formerly FEMA Form 008-0-23) THIRA/SPR After Action Conference Calls**

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.**

This package is an extension of an information collection titled the Threat and Hazard Identification and Risk Assessment (THIRA) / Stakeholder Preparedness Review (SPR) Reporting Tool under OMB Control Number 1660-0131. The Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA) (Pub. L. 109-295), as amended by the Implementing Recommendations of the 9/11 Commission Act of 2007 (Pub. L. 110-53), established an annual preparedness reporting requirement for States and territories through the State Preparedness Report (PKEMRA Section 652(c), 6 U.S.C. 752(c). FEMA subsequently expanded preparedness reporting through the Stakeholder Preparedness Review (SPR), which is now completed annually by States, territories, urban areas, and Tribes receiving DHS non-disaster preparedness grant funding. Each report must include a description of current capability levels, a discussion of the extent to which target capabilities identified in the applicable state homeland security plan and other applicable plans are unmet, and an assessment of resources needed to meet the preparedness priorities established under PKEMRA Section 646(e) (6 U.S.C 746(e)), including: (i) an estimate of the amount of expenditures required to attain the preparedness priorities; and (ii) the extent to which the use of Federal assistance during the preceding fiscal year achieved the preparedness priorities. To meet this requirement, States, territories, urban areas, and Tribes first identify capability targets through the THIRA and then assess against these targets in the SPR. Through the SPR, these jurisdictions estimate their current capabilities, identify and describe gaps between current capabilities and targets, indicate their intended approach for addressing gaps in the future, and report on the impact of Federal grant dollars in building and sustaining capabilities. It is also important to note that completing the THIRA and SPR are allowable expenses under the grant awards.

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.**

This collection assessment will remain on the same online platform available to respondents through *https://preptoolkit.fema.gov/urt-info*. The information collected enables States, territories, urban areas, and Tribes, along with the Federal Government, to understand the risks these entities face from threats and hazards, to estimate the capabilities and resources they need to manage those risks, to assess their current capability levels against their targeted capability levels, and to identify gaps between their current capabilities and the capabilities they need. This information characterizes the first two components of the National Preparedness System:

Identifying and Assessing Risk, and Estimating Capability Requirements. It serves as a foundation for the remainder of the National Preparedness System, and thus represents the first steps of the nation's process for achieving its National Preparedness Goal of a secure and resilient nation.

The information collection consists of two major steps. Respondents first complete a THIRA by establishing capability targets based on their jurisdiction's own threats and hazards. Respondents then estimate their current capability levels against those targets in the SPR. Together, the two steps enable respondents to identify their capabilities and capability gaps and prioritize the building and sustaining of capabilities.

The assessment is structured by the 32 core capabilities from the 2015 National Preparedness Goal, and therefore States, territories, and urban areas provide information on their current capability levels and capability gaps in each core capability; Tribes complete the THIRA and SPR processes only for eight of the core capabilities, which includes 12 total capability targets. States, territories, urban areas, and Tribes gather the information and complete the THIRA following Comprehensive Preparedness Guide (CPG) 201, Third Edition. States, territories, urban areas, and Tribes typically rely on subject matter expertise of emergency management personnel, homeland security personnel, and other stakeholders to complete the THIRA and SPR.

This collection is designed to standardize the submission method for States, territories, urban areas, and Tribes, and to meet public law requirements. The information serves as the primary source of data on the preparedness capabilities of all of the states and territories. The information is summarized in the National Preparedness Report, as required by *Presidential Policy Directive 8: National Preparedness* (PPD-8). The National Preparedness Report is an annual report to the President that summarizes national progress in building, sustaining, and delivering the 32 core capabilities outlined in the National Preparedness Goal.

FEMA and other Federal Departments and Agencies use THIRA and SPR information to inform and prioritize their preparedness programs and activities. FEMA's National Training and Education Division (NTED) uses the information to identify and address the Nation's greatest training needs. Since 2016, FEMA has shared SPR information with over 50 Federal preparedness partners, and thus the information is widely used across the Federal preparedness community.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The online forms for this collection provide respondents with an easier and streamlined means to ensure the PKEMRA requirements could be met in a timely fashion. FEMA is utilizing the online Unified Reporting Tool (URT) hosted on preptoolkit.fema.gov web portal to enable respondents to access the online forms. Preptoolkit.fema.gov is a government-wide collaborative web portal designed for the whole community to which most respondents already have access (and those who do not can create online accounts). The link to access FEMA Forms FF-008-FY-21-106 (THIRA / SPR Unified Reporting Tool), and FF-008-FY-21-107 (After Action Conference Calls) can be found at: https://preptoolkit.fema.gov/urt-info. Through the online process, respondents can easily log in and respond to each jurisdiction's applicable questions. FEMA's Risk Identification and Capability Assessments Branch (RICAB) then exports the entered data into Excel Spreadsheets that are stored on the internal FEMA SharePoint for analytical purposes. For the After-Action Conference Calls found in FEMA Form FF-008-FY-21-107, questions will be provided to respondents by sending them a copy of FEMA Form FF-008-FY-21-107. Once respondents receive the form, FEMA will schedule regional after-action calls where respondents will have an opportunity to verbally respond to the questions. If respondents prefer to answer the questions independently, they can use the form for that purpose and email it back to FEMA's RICAB office. Responding to these after-action questions is voluntary and intended to give respondents an opportunity to provide input and feedback for improvements.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This information is not collected in any other form, and therefore is not duplicated elsewhere.

5. **If the collection of information impacts businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.**

FEMA provides technical assistance via training and technical support to those who request such support in responding to agency requests for information such as community THIRA and SPR. Additionally, governmental jurisdictions of varying size may utilize the subject grant funds if they complete the THIRA and SPR process.

6. **Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.**

FEMA would be unable to properly meet the PKEMRA-mandated requirement to produce the SPR without this collection of information. The PKEMRA-mandated requirement to produce the Catastrophic Resource Report would also be hindered, as the report includes THIRA and SPR information. Additionally, the Federal preparedness community would lose the main source of data that provides an annual understanding of the States', territories', urban areas' and Tribes' current preparedness levels, including an understanding of how prepared States, territories, urban areas, and Tribes are for real-world events. If the information requested in this collection was not collected, the National Preparedness Report, a PPD-8 requirement, would lose one of its main inputs.

States, territories, urban areas, and Tribes would not have a systematic process for obtaining the information required in the foundational steps of the National Preparedness System, and the nation would therefore be unable to follow that organized process for achieving the National Preparedness Goal.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner (*See* 5 CFR 1320.5(d)(2)):**

    a. **Requiring respondents to report information to the agency more often than quarterly.**

This information collection does not require respondents to report information more than quarterly.

    b. **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**

This information collection does not require respondents to prepare a written response in fewer than 30 days after receipt of it.

    c. **Requiring respondents to submit more than an original and two copies of any document.**

This information collection does not require respondents to submit more than an original and two copies of any document.

    d. **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**

This information collection does not require respondents to retain records (other than health, medical, government contract, grant-in-aid, or tax records) for more than three years.

e. **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.**

This information collection contains a statistical survey that is designed to produce valid and reliable results that can be generalized to the universe of study.

f. **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**

This information collection does not use a statistical data classification that has not been reviewed and approved by OMB.

g. **That includes a pledge of confidentiality that is not supported by authority established in statue or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**

This information collection does not include a pledge of confidentiality that is not supported by established authorities or policies.

h. **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This information collection does not require respondents to submit trade secrets or other confidential information.

8. Federal Register Notice:

a. **Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day Federal Register Notice inviting public comments was published on February 11, 2026, at 91 FR 6240. Fourteen (14) public comments were received.

Comment 1 (FEMA-2025-0278-0002): A private individual stated:

> I recommend that we create a "one stop shop" risk assessment data that will meet the requirement and needs of the THIRA/SPR and the HIRA (Mitigation Plans) and EMAP Accreditation. Having an innovative hybrid risk assessment that is formatted in a manner to meet the requirements of various programs will reduce overlaps and duplication of efforts. Will make workloads easier for the states and local jurisdictions. By reducing the workload, the quality of data will be enhanced. For more information refer to the Homeland Security Operational Analysis Center Research Report titled, "Streamlining Emergency Management". I have already produced a one stop shop format that we are piloting in our own state that is designed to meet the requirements of all the other programs.

FEMA Response to Comment 1: FEMA appreciates the respondent's recommendations to develop a "one stop shop" risk assessment approach to align requirements across the THIRA/SPR, HIRA and EMAP. Consistent with the Paper Reduction Act, FEMA seeks to minimize the information collection burden, reduce duplication across federal programs, and ensure the practical utility of collected data. FEMA recognizes that greater alignment among risk assessment processes may help streamline reporting and improve data quality. FEMA will consider this recommendation as part of ongoing efforts to evaluate and refine THIRA/SPR information collection requirements.

Comment 2 (FEMA-2025-0278-0003): The Washington State Emergency Management Division stated:

> Regarding "(a) evaluate whether the proposed data collection is necessary for the proper performance of the Agency, including whether the information shall have practical utility": I refer you to the Homeland Security Grant Program Review Subcommittee's report dated September 14th, 2023 which found the THIRA/SPR process "...is apparently not factored into the risk methodology score that determines the hierarchy of [HSGP] funding levels. As a result, the utility of the THIRA process is unclear."
>
> Regarding "(b) evaluate the accuracy of the Agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used": The burden of information collection is tremendous, requiring significant amounts of time and subject matter expertise to understand the reporting requirements, develop and disseminate data gathering tools and methodologies, organizing and analyzing data, and finally submitting data gathered in correct format. This burden rises to the level of necessitating one or more full time employees dedicated

solely to data gathering and processing, a luxury not all jurisdictions can afford. Regarding the methodology, while the reporting format and "steps" of the THIRA/SPR process are standardized, there is no standardized methodology across all reporting jurisdictions. Interpretation of requirements, definitions, and data gathered vary significantly, even within states with multiple reporting jurisdictions.

Regarding "(c) enhance the quality, utility, and clarity of the information to be collected": I refer you to the above-mentioned subcommittee's report which recommends "strengthening the THIRA/SPR strategy to reflect the current threats communities face more accurately, including eliminating the THIRA."

Regarding "(d) minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses": Electronic data collection and reporting mechanisms are already in place, however, they are of limited practical use and "clunky." In order to truly minimize the collection burden, a centralized online reporting mechanism would be required. This mechanism would need to be situated with FEMA and facilitate direct input from all jurisdictional levels in a straightforward and easy to understand manner.

In closing, I again refer you to the subcommittee's report in regard to the THIRA/SPR process in recommending DHS/FEMA "eliminate, or at least significantly modify and streamline, the DHS threat risk methodology to better quantify and inform grant funding allocation," and, "propose amendments that permit multi-year funding awards of grants while accounting for what is achievable in the budget cycle and the current threats being targeted." The current process lacks standardization across jurisdictions, requires exhaustive and uneven data gathering efforts, and produces a product with limited to no value outside of "checking the box" for grant applications to fund the absolutely necessary work being done at the state and local level to prepare for, prevent, protect from, mitigate, and respond to threats and hazards.

FEMA Response to Comment 2: FEMA appreciates the commenter’s feedback regarding the THIRA/SPR information collection, including concerns related to necessity, practical utility, burden, methodological variability, and data quality, as well as the referenced Homeland Security Grant Program Review Subcommittee report. Consistent with the Paper Reduction Act, FEMA seeks to ensure that information collections are necessary for the proper performance of agency functions, have practical utility, and minimize respondent burden. FEMA acknowledges the concerns regarding variability across jurisdictions, the effort required to complete submissions, and the usability of current reporting tools. FEMA will consider these comments into its ongoing evaluation of the THIRA/SPR information collection, including opportunities to improve clarity, enhance consistency, reassess burden estimates, and streamline data collection through improved technology.

Comment 3 (FEMA-2025-0278-0004): The New York State (NYS) Division of Homeland Security and Emergency Services (DHSES) stated:

> …. The NYS Division of Homeland Security and Emergency Services (DHSES) has long had concerns with the THIRA/SPR process and methodology and has shared these concerns with FEMA on numerous occasions.
>
> The THIRA/SPR process is deeply flawed in that it does not truly result in a risk or capability assessment, as the name implies. For example, it does not require a comprehensive threat/hazard risk assessment; rather, it involves the identification of various scenarios that are used to identify capability targets. In other words, THIRA only requires a simple listing of threats/hazards and some basic contextual information. There is no true assessment of these threats/hazards, such as an evaluation of their likelihood and consequence. Additionally, each state and urban area is required to identify its own unique capability targets. The differing capability targets do not lend themselves to aggregation and cannot be meaningfully compared by FEMA. These are just a few of the fundamental flaws with the current process.
>
> At the state and local level, the THIRA/SPR process requires tremendous amount of time (over 100 hours) and effort to collect the necessary data and information, but there is little (if any) practical utility for the state and local agencies. It is also unclear to us what value the process has for FEMA (beyond meeting the Congressional mandate to produce the National Preparedness Report) and if/how FEMA uses the THIRA/SPR to make decisions.
>
> NYS DHSES very much agrees with the need to conduct comprehensive risk and capability assessments to help ensure readiness for the various threats and hazards we face. However, due to the flawed THIRA/SPR process, New York State has developed its own risk/capability initiative known as the County Emergency Preparedness Assessment (CEPA). The CEPA process includes facilitated meetings with emergency management stakeholders in each county, and standardized risk and capability assessment process that allows for the ability to aggregate data and information in structured way allowing for the ability to identify key trends and insights. Unlike THIRA/SPR, which relies on a web portal to capture and report the information, CEPA is focused on in-person engagements with key stakeholders which also helps to build and strengthen relationships, and these relationships are critical during all phases of emergency management.

> We believe the CEPA process could easily be adopted by FEMA and that it would result in a more useful, intuitive, and meaningful risk and capability assessment process. Some states have already adopted CEPA, and we would be happy to engage with FEMA more on this important topic as well.

FEMA Response to Comment 3: FEMA appreciates the commenter's feedback regarding the THIRA/SPR information collection, including concerns related to methodology burden, and practical utility, as well as the description of the County Emergency Preparedness Assessment (CEPA) approach. Consistent with the Paper Reduction Act, FEMA seeks to ensure that the information collections are necessary for the proper performance of agency functions, have practical utility, and minimize respondent burden. FEMA acknowledges the concerns regarding the level of effort required to complete THIRA/SPR submissions, variability in implementation across jurisdictions, and challenges related to data comparability and usability. FEMA will consider these comments as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to improve clarity of guidance, enhance consistency and standardization where appropriate, reassess burden estimates, and strengthen the utility of collected information. FEMA also appreciates the information provided on alternative approaches and encourages continued information sharing to support the identification of best practices.

Comment 4 (FEMA-2025-0278-0005): A private individual stated:

> Please include language within the updated THIRA document to ADD or reflect a category for "Complex Coordinated Terrorist Attack" (CCTA) as this is a major new threat vector in our evolving US threat lanscape of Iran engagement but more importantly the complex web of stateside FTO,TCO,HVE,DVE,RMVE from Al Qaeda/ISIS/AoA++ and the "Homeland Plot" or "09/11-2.0" to CodePink/PSL/CAIR/MSA/Tranttifa this should be at the top and highlighted within any DHS checklist (s).

FEMA Response to Comment 4: FEMA appreciates the commenter's recommendation to include additional threat considerations, including complex coordinated terrorist attacks (CCTA) within the THIRA/SPR assessment. FEMA seeks to ensure that information collections are necessary, have practical utility, and provide a flexible framework for jurisdictions to assess risks based on their specific threat environments. The THIRA/SPR methodology is designed to allow jurisdictions to consider a range of threats and hazards, including emerging and evolving risks, as appropriate. FEMA will consider this recommendation as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to clarify guidance and ensure that the methodology continues to support the identification and assessment of current and emerging threats, consistent with national preparedness priorities and applicable requirements.

Comment 5 (FEMA-2025-0278-0006): A private individual stated:

> To improve the THIRA/SPR process I would ask you to read the recommendations provided by Rand Corporation - Homeland Security Operational Analysis Center (HSOAC)from the research report "Streamlining Emergency Management", pages 10-11;16;27-28. It points out how the THIRA/SPR and the HMP processes should be streamlined to help achieve greater integration. In other word consolidate the THIRA and the HIRA to create a single all-hazards risk assessment. I would also recommend reading the HSOAC research report "Improving Assessments in Emergency Management" which goes into detail on how to integrate the THIRA and HIRA together. Here are the links to the reports:
>
> https://www.rand.org/pubs/research_reports/RRA2437-1.html
> https://www.rand.org/pubs/research_reports/RRA1440-5.html

FEMA Response to Comment 5: FEMA appreciates the commenter's recommendation to review analysis by the RAND Corporation - Homeland Security Operational Analysis Center (HSOAC) regarding opportunities to streamline and integrate the THIRA/SPR and hazard mitigation planning processes. FEMA seeks to minimize respondent burden, reduce duplication, and enhance the practical utility of information collections. FEMA recognizes that improved alignment across preparedness and mitigation assessment processes may support these objectives. FEMA will consider the referenced research and recommendations as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to improve coordination, reduce redundancy, and enhance efficiency and utility of data collection, consistent with applicable requirements.

Comment 6 (FEMA-2025-0278-0007): The California Governor's Office of Emergency Services provided a detailed comment, summarized as follows:

> While the process is informative, its practical utility has been limited. Threats and hazard identification is valuable but much of the resulting THIRA/SPR output is difficult to apply in real operational decision-making. Target capability language is open to rigid and does not consistently reflect real-world state needs, gaps, and variations in performance across capability components. As a result, a reported 100% capability in a core area (e.g., planning) may mask meaningful deficiency in sub-elements of that capability.
>
> California's scale and complexity significantly complicate the process. With 40 million residents, thousands of jurisdictions, and extensive SLTT partners, it is not feasible to gather fully comprehensive input. This creates a burdensome reporting process, especially for a single division. Estimated workload exceeds 1,000 staff hours in THIRA/SPR years and is approximately 600-700 hours in SPR-only years, not including

stakeholder time, meetings, or coordination. Including external participation, the total burden would be substantially higher.

The methodology also relies heavily on assumptions and standardized modeling that can oversimplify complex and dynamic hazards. While intended to improve consistency and transparency, the approach can be difficult for practitioners to interpret and apply. Many capability measures are inherently qualitative, and quantifying them requires extensive SME judgment with limited technical assistance, increasing uncertainty and variability in results.

Overall, the THIRA/SPR framework is viewed as overly one-size-fits-all for large and diverse states like California. The outputs are not easily translated into actionable insights for all stakeholders, and the burden on staff and partners is significant. California notes that while the SPR supports broader planning products and strategies, its current structure limits its usability, especially given its assumptions, complexity, and reporting demands.

FEMA Response to Comment 6: FEMA appreciates the commenter’s feedback regarding the THIRA/SPR information collection, including concerns related to burden, practical utility, methodological assumptions, data quality, variability across jurisdictions, the balance of qualitative and quantitative data, the applicability of certain capability targets, and the functionality of the Unified Reporting Tool (URT), as well as recommendations for increased flexibility in the reporting process. Consistent with the Paper Reduction Act, FEMA seeks to ensure that the information collections are necessary for the proper performance of agency functions, have practical utility, and minimize respondent burden. FEMA also seeks to leverage appropriate information technology to improve the efficiency of data collection. FEMA acknowledges the concerns regarding the level of effort required to complete THIRA/SPR submissions, particularly for large and complex jurisdictions, as well as challenges related to standardization, data comparability, and data availability for certain capability targets that may fall outside of state authority. FEMA will consider these comments as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to reassess burden estimates and underlying assumptions, improve clarity of guidance and technical assistance, enhance flexibility where appropriate, and explore improvements to electronic reporting systems to streamline data entry and reduce burden.

Comment 7 (FEMA-2025-0278-0008): The Baltimore Area Urban Area Security Initiative (UASI) stated:

The concerns outlined below have been raised repeatedly over multiple reporting cycles, yet no meaningful changes have been made. As a result, the current process continues to impose significant burden without a corresponding improvement in data quality or usefulness.

First, several capability targets do not reflect the actual roles, authorities, or resources of emergency management agencies. For example, targets tied to areas such as housing insurance fall outside the scope of emergency management responsibilities. Requiring jurisdictions to report against targets they do not control undermines the credibility and utility of the assessment.

Second, the flexibility for jurisdictions to define their own capability targets has resulted in a process that is entirely subjective. This makes it impossible to measure progress in any meaningful way—either over time within a jurisdiction or comparatively across jurisdictions. Without standardized benchmarks, the data cannot support valid national-level analysis or informed decision-making.

Third, the reporting tool itself is inefficient and unnecessarily time-consuming. The system's structure requires extensive manual data entry across fragmented fields, even though the same information could be more clearly and efficiently provided through a standardized template submission. The current format prioritizes system design over user practicality and significantly increases administrative burden.

Fourth, the approach to aggregating jurisdictional data into regional or state-level submissions is unclear and unresolved. The tool collects detailed, jurisdiction-level inputs —including information on mutual aid—yet requires submission at a higher level without providing guidance on weighting or reconciliation. This raises fundamental questions about how the data is interpreted and whether the resulting outputs are valid.

Finally, there has been a lack of updates, responsiveness, or training from FEMA despite ongoing feedback. The absence of engagement in these long-standing issues further limits the effectiveness of the process.

In its current form, the THIRA/SPR process does not produce consistent, comparable, or decision-useful data and continues to require a disproportionate level of effort from jurisdictions. Addressing these longstanding issues is necessary to ensure the process meets its intended purpose.

FEMA Response to Comment 7: FEMA appreciates the commenter's feedback regarding the THIRA/SPR information collection, including concerns related to burden, practical utility, methodological consistency, standardization of capability targets, data aggregation and comparability, the functionality of the reporting tool, and responsiveness to prior stakeholder input. FEMA is committed to ensuring that information collections are necessary for the proper performance of agency functions, have practical utility, are appropriately standardized, and minimize responded burden. FEMA acknowledges the concerns raised regarding the applicability of certain capability targets across diverse jurisdictional responsibilities, variability in implementation, challenges in data aggregation and interpretation, and the usability of the current reporting system. FEMA will consider these comments as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to improve clarity of guidance, enhance consistency and standardization where appropriate, strengthen instructions for data aggregation and reporting, reassess burden estimates and underlying assumptions, and explore enhancements to electronic reporting tools and user support resources. FEMA also notes that it continues to evaluate stakeholder feedback received through prior reporting cycles as part of its routine review and refinement of the THIRA/SPR process.

Comment 8 (FEMA-2025-0278-0009): The Utah Division of Emergency Management stated:

> While the need for a comprehensive threat assessment and capability assessment exists, the current process and methodology used by FEMA has provided complications and uneven reporting in our jurisdiction. We have found that the data and information collected in the current THIRA and SPR process provides little applicable value to state and local stakeholders.
>
> Utah's topography, population, and general disaster threats and hazards are vastly different, even for jurisdictions that are only an hour's drive away. As part of the THIRA process, theoretical scenarios are used to measure a capability target and current capability. However, it is nearly impossible to have realistic scenarios that effectively capture the unique circumstances of every jurisdiction in Utah.
>
> Additionally, stakeholders have also expressed concern over the capability target and current capability measurements. Utah's 'worst-case' scenario would be a large earthquake across the Wasatch Fault. Utah has not to date had an earthquake of that magnitude in such a populated area. Current data and tools can give an estimate of what may happen, but there is no measurable data or past experience to allow stakeholders to come up with a meaningful capability target to measure against. Many stakeholders have expressed concern with the scenario-based type of reporting, citing that it feels they are just guessing numbers without past data to compare against.
>
> We recognize the importance of conducting meaningful capability assessments to help our jurisdictions understand their capabilities and improve upon them. However, because the current THIRA and SPR processes do not meet our state's needs, we have implemented a locally based assessment called the Utah Community Emergency Preparedness Assessment (UCEPA), similar to the programs utilized by New York State and Colorado State. We have found that this process greatly benefits our local jurisdictions by giving them meaningful data focused on capabilities for their individualized circumstances. We have also been working to integrate a similar UCEPA

> process to the state agency level, where the data can be more easily tracked and trends monitored over several years….

FEMA Response to Comment 8: FEMA appreciates the commenter's feedback regarding the THIRA/SPR information collection, including concerns related to the applicability of scenario-based methodology, variability across jurisdictions, capability target development, and the practical utility of resulting data for state and local stakeholders. Consistent with the Paper Reduction Act, FEMA seeks to ensure that information collections are necessary for the proper performance of agency functions, have practical utility, and minimize respondent burden. FEMA acknowledges the challenges described in applying standardized scenario-based planning approaches across jurisdictions with different geographic, demographic, and hazard profiles, as well as concerns regarding the development and interpretation of capability targets in low-frequency, high-consequence events. FEMA will consider these comments as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to improve clarity of guidance, enhanced flexibility in scenario application, strengthen technical assistance, and support more consistent interpretation of capability assessment methods across diverse jurisdictions. FEMA also notes the commenter's description of alternative state-led assessment approaches and will consider such examples as part of ongoing efforts to identify best practices in preparedness assessment methodologies.

Comment 9 (FEMA-2025-0278-0010): The Maryland Department of Emergency Management stated:

> The State of Maryland strongly supports the intent behind THIRA/SPR, to assess risk and capability in a manner that informs preparedness investments and strengthens national readiness. However, as currently structured, the THIRA/SPR process remains overly burdensome, insufficiently standardized, and of limited practical utility to state and local partners.
>
> **Practical Utility of the Information Collection**
>
> In its current form, THIRA/SPR does not function as a true risk or capability assessment. The process relies on scenario-based inputs and jurisdiction-specific capability targets that cannot be meaningfully aggregated or compared across jurisdictions. As a result, the outputs have limited value for operational decision-making, prioritization, or national-level analysis.
>
> For partners, the data produced (under the current methodology) is rarely used to inform real-world planning, resource allocation, or policy decisions. At the federal level, it remains unclear how THIRA/SPR data meaningfully influences funding determinations

or strategic investments. This disconnect undermines confidence in the process and reduces its effectiveness as a national preparedness tool.

Burden Estimate and Methodology

The burden associated with the THIRA/SPR is significant and underestimated. The process requires extensive coordination across state agencies and local jurisdictions, development of data collection tools, facilitation of stakeholder engagement, analysis of inputs, and data entry into a reporting system that consistently breaks down. This effort takes a considerable amount of staff hours that many jurisdictions simply do not have the bandwidth to provide.

Additionally, while the reporting structure is standardized, the methodology is not. Variability in interpretation, data collection approaches, and stakeholder engagement results in inconsistent and incomparable data outputs across jurisdictions.

Enhancing Quality, Utility, and Clarity

Maryland encourages FEMA to move toward a more standardized, scalable, and analytically
meaningful approach to risk and capability assessment. Specifically, we recommend:

- Transitioning to a model that incorporates both risk and capability in a consistent and measurable way;
- Standardizing data inputs and assessment criteria to enable aggregation and comparison across jurisdictions;
- Aligning THIRA/SPR with other federal and state requirements, including Hazard Identification and Risk Assessments (HIRAs), mitigation planning, Integrated Preparedness Plans (IPPs), grant reporting requirements, and accreditation frameworks such as EMAP, to reduce duplication of effort; and
- Prioritizing outputs that are actionable and directly inform planning, investment, and policy decisions at all levels of government.

Maryland also notes that FEMA previously proposed updates to the THIRA/SPR methodology that would have addressed several longstanding concerns, including the use of Likert-scale, rubric-based assessments across POETE areas and the removal of duplicative narrative requirements. These changes would improve comparability, reduce burden and enhance usability of the data. We strongly encourage FEMA to implement these changes.

Various States and UASI jurisdictions have implemented new, innovative capability assessment methodologies which better translate data collected into practical assessments useful in guiding investment and understanding gaps. Maryland would be an enthusiastic participant in a FEMA-led working group to help translate these innovations into a standardized national model.

Minimizing the Burden Through Improved Systems and Design

While the Unified Reporting Tool (URT) provides a centralized mechanism for submission, it does not sufficiently reduce the overall burden of data collection and analysis. True burden reduction will require a reimagined approach that integrates data collection across programs and allows for a “one-stop-shop” risk and capability assessment framework.

Maryland supports the development of a unified, hybrid assessment model that can simultaneously meet THIRA/SPR requirements, mitigation planning needs, and broader preparedness and resilience frameworks. Such an approach would reduce redundancy, streamline workloads, and improve data quality while maximizing the value of stakeholder engagement.

Additionally, FEMA should ensure that any future methodology changes are implemented in a manner that respects the time and effort of participants. Requiring jurisdictions to complete a full THIRA under the current methodology immediately prior to a major overhaul risks duplicative effort and stakeholder fatigue. Providing flexible or hybrid options during transition periods would better support partners and improve overall outcomes.

Conclusion

The current THIRA/SPR process places a substantial burden on State and local partners while producing limited actionable value. Maryland strongly encourages FEMA to significantly revise and streamline the methodology to prioritize standardization, usability, and alignment with real-world emergency management practice.

A modernized, integrated, and analytically sound approach to risk and capability assessment is essential to not only improve preparedness outcomes, but also to enhance accountability and credibility with elected officials and the public we serve.

FEMA Response to Comment 9: FEMA appreciates the commenter’s feedback regarding the THIRA/SPR information collection, including concerns related to burden, practical utility, methodological consistency, standardization, data comparability, and alignment with real-world emergency management practices, as well as recommendations for streamlining and integrating assessment processes. Consistent with the Paper Reduction Act, FEMA seeks to ensure that the information collections are necessary for the proper performance of agency functions, have practical utility, support meaningful analysis, and minimize respondent burden. FEMA acknowledges the concerns regarding the level of effort required to complete THIRA/SPR submissions, variability in implementation across jurisdictions, challenges in aggregating and comparing data, and the usability of current reporting tools. FEMA will consider these comments as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to enhance the standardization and comparability, improve alignment with related preparedness and mitigation requirements, reassess burden estimates and methodology, and explore options to streamline data collection, and improve the utility of outputs for decision-making. FEMA also appreciates the commenter's interest in continued collaboration and will consider stakeholder input in future refinement efforts.

Comment 10 (FEMA-2025-0278-0011): The Connecticut Division of Emergency Management / Homeland Security stated:

> From Connecticut's perspective as a state level user, we appreciate the structured framework FEMA provides for capability assessment and preparedness planning. The use of standardized impacts has greatly improved year-over-year collaboration between partners in determining capabilities, gaps, and general topics of discussion regarding impacts and hazards. We would like to highlight several areas where updates to the THIRA/SPR process and tool would improve accuracy, usability, and value for states.
>
> 1) Data entry in the THIRA/SPR is currently required by states, tribes, and current FEMA-funded UASIs only. As a state, we are responsible for the required submission, however the most accurate information about capability gaps and operational capacity resides with local jurisdictions. Most local jurisdictions do not have the bandwidth or capacity to undertake a full THIRA/SPR process however municipal and regional partners manage the day-to-day realities of emergency response and have the clearest understanding of true gaps. Connecticut conducts regular data calls and work sessions by core capability and invites state, local, and regional partners pertinent to that capability, however without a mechanism for structured, direct local input, states must manually collect and interpret this information, which can be inefficient and could reduce accuracy. Connecticut encourages FEMA to consider enabling some form of local or regional data entry or a standardized sub state collection process. Connecticut would recommend keeping the THIRA/SPR requirement for the states, but maybe consider developing a method for optional local/regional data entry that ultimately feeds the state's data entry and can be used as reference for state submission.

2) It is well known that THIRA data does not impact DHS/FEMA annual grant allocations to states and locals through the Emergency Management Performance Grant (EMPG) and Homeland Security Grant Program (HSGP). The data that DHS/FEMA uses currently to determine funding levels is often out of the control of states, especially Emergency Management partners, and based on factors that are not impacted by gaps outlined in the THIRA/SPR process. To improve the efficacy of limited FEMA emergency management/homeland security grant dollars, the gaps and findings from States in the annual THIRA/SPR process should be taken into consideration for future funding allocations.

3) Even with the annual changes to required core capabilities, the THIRA/SPR Unified Reporting Tool (URT) could better support year over year tracking of improvements and investments. While there is a way to compare prior assessments, if the URT could have a real-time data tracking tool to monitor how capability gaps shift over time, or close based on specific investments, the states could have real-time data analytics as we prepare budgets, implement projects, and conduct future THIRA/SPRs. With all of the technology and federal portals, tying the URT to FEMA Go and/or ND Grants etc. would enhance the tool and overall THIRA/SPR process. Prepopulated prior year data, trend visualizations, or structured change tracking would significantly improve states' ability to measure progress, justify investments, and communicate outcomes to stakeholders.

FEMA Response to Comment 10: FEMA appreciates the commenter’s feedback regarding the THIRA/SPR information collection, including observations on the value of the structured framework and recommendations related to local input, data accuracy, usability, and enhanced data analytics and tracking capabilities within the Unified Reporting Tool. Consistent with the Paper Reduction Act, FEMA seeks to ensure that information collections have practical utility, minimize respondent burden, and leverage information technology to improve the efficiency usefulness of data collection. FEMA acknowledges the challenges associated with incorporating local-level information into state submissions, as well as the potential benefits of improved data tracking, trend analysis, and system integration. FEMA will consider these comments as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to enhance guidance for data collection across jurisdictions, explore improvements to reporting tools, and strengthen the utility of collected information for preparedness planning and decision-making.

Comment 11 (FEMA-2025-0278-0012): The Michigan State Police, Emergency Management and Homeland Security Division stated:

Overall, the URT is a usable system that follows a logical flow. However, there are several recurring system and process challenges that significantly affect the user experience, data quality, and the ability of states to fully leverage the THIRA/SPR process.

1. System Time-Out and Login Issues

The most persistent frustration involves the system timing out while users are actively working in the URT. Users often do not realize the system has logged them out until attempting to save progress or transition to another section, resulting in lost work. This issue may be related in part to the URT automatically opening multiple browser windows during login, but regardless of the cause, the unexpected time-outs interrupt workflow and reduce efficiency. A more predictable and visible session-timeout warning would greatly improve usability.

2. SPR Output Format Challenges

While POETE elements are entered in a logical and structured manner, the generated SPR pre-submission output is difficult to read and track. Each POETE element is placed in a single column that often spans multiple pages. Reviewing gaps and approaches requires constant page-turning to follow the information flow. A more user-friendly, consolidated, or horizontally aligned output format would substantially improve readability and review.

3. Lack of Transparency on How Data Is Used at the Federal Level

Despite the THIRA/SPR being required for grant eligibility, it is unclear how the data submitted through the URT is used by FEMA and federal partners. The annual National Preparedness Report is highly generalized and does not provide actionable insights for states or regions. States would benefit from more detailed information on how their submissions inform national or regional preparedness activities, how state-level data contributes to federal decisions, and how states can use this information to improve their own planning efforts. States should receive an explanation of how their data was used.

4. Lack of Common Approaches and Insufficient Guidance

There are no nationwide nor standardized approaches for completing the SPR or entering POETE details into the URT. If the SPR is being used by the FEMA Review Council or the federal government, in general, to inform future grant eligibility, it is essential that states understand how to provide consistent, accurate, and meaningful data that appropriately reflects their needs. Requests for assistance and clarification on data entry expectations have not yielded actionable guidance, leaving states uncertain about best practices.

Compounding this challenge is the reduction in FEMA-led training opportunities. Both regional and national training sessions are needed to ensure consistent data entry and interpretation across jurisdictions. Without this shared foundation, states may unintentionally report data in ways that are not aligned with national expectations.

5. After Action Calls and Unresolved Issues
The After-Action calls offer an avenue for feedback, but many recurring concerns—such as usability issues, data-entry questions, and lack of training—remain unresolved year after year. Some concerns have been resolved, like issues related to rich-text formatting, random characters generated in the URT, and spacing issues. Updates to the URT often occur without advance notice or documentation explaining what has changed, which complicates planning and increases the risk of errors. System updates should occur outside of the typical THIRA/SPR submission window, ideally between January and May.

6. Key Needs / Summary

- From a state perspective, the most important improvements include:
- A more stable URT platform that does not log users out unexpectedly.
- A more readable SPR output format for internal review and planning.
- Greater transparency on how state data is used at regional and national levels.
- Regular and accessible regional and national training opportunities.
- Clear guidance on expected data-entry approaches to ensure national consistency.
- Advance notice and documentation for any URT system updates.

These changes would improve detail and data quality, reduce burden, and strengthen the value of the THIRA/SPR process for both states and the federal government.

FEMA Response to Comment 11: FEMA appreciates the commenter’s feedback regarding the THIRA/SPR information collection, including observation on the usability of the Unified Reporting Tool and concerns related to system functionality, data quality, transparency, and training. FEMA seeks to minimize respondent burden, enhance the practical utility of collected information, and leverage information technology to improve the efficiency and reliability of data collection. FEMA acknowledges the concerns regarding system timeouts, usability of output formats, clarity of data entry, availability of training, and transparency in how submitted data is used. FEMA will consider these comments as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to improve system performance and user experience, enhance guidance and training, increase transparency regarding data use, and provide clearer communication regarding system updates.

Comment 12 (FEMA-2025-0278-0013): The Oregon Department of Emergency Management stated:

The THIRA/SPR process led by the Federal Emergency Management Agency intends to measure how prepared states are for human-caused, natural, or technological threats, but the current use of state capability targets offer limited practical utility. Quantitative, scenario-based targets are too abstract and do not translate into actionable planning, investment, or operational decisions. As a result, the process functions mainly as a compliance exercise.

A shift to Likert-scale or capability maturity assessments would better reflect real-world conditions and provide more meaningful insight. Eliminating state capability targets would allow the process to focus on actionable gaps and trends.

....

The burden is underestimated mainly because of reliance on a flawed quantitative methodology. Developing capability targets requires significant coordination but relies on subjective and inconsistent data. The assumption that jurisdictions can accurately quantify capabilities is not realistic.

Moving to a qualitative, Likert-scale approach and eliminating state targets would reduce burden while improving consistency and credibility.

....

Quality and utility would improve by:

- Eliminating state capability targets
- Shifting to Likert-scale or maturity-based assessments
- Aligning with the Planning, Organizing, Equipping, Training, and Exercise (POETE) framework and real-world performance data (incidents, exercises)
- Providing clearer guidance and flexibility for regional differences

These changes would produce more actionable, comparable, and understandable data.

....

Burden can be reduced by:

- Removing quantitative target requirements
- Leveraging existing state/local assessment data
- Using simplified, qualitative inputs

- Improving electronic tools for data reuse and integration, allowing for carryover of all data from year to year.

> **Summary**
>
> The issue is both the state capability targets and the broader THIRA/SPR methodology, which relies on unrealistic quantitative assumptions. Eliminating targets and shifting to qualitative, maturity-based assessments would reduce burden and make the process more useful for improving preparedness.

FEMA Response to Comment 12: FEMA appreciates the commenter's feedback regarding the THIRA/SPR information collection, including concerns related to the usefulness of quantitative capability targets, methodological assumptions, burden estimates, and recommendations to transition toward qualitative or maturity-based assessment approaches. Consistent with the Paper Reduction Act, FEMA seeks to ensure that the information collections are necessary for the proper performance of agency functions, have practical utility, and minimize respondent burden. FEMA acknowledges the concerns regarding the ability of standardized quantitative capability targets to reflect jurisdictional variability and the challenges associated with translating scenario-based assessments into operational planning and decision-making. FEMA will consider these comments as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to improve the clarity and usefulness of guidance, reassess methodological assumptions, enhance the utility of collected information for preparedness planning, and explore ways to reduce burden through improved flexibility and efficiency in data collection.

Comment 13 (FEMA-2025-0278-00014): The Chicago Office of Emergency Management and Communications stated:

> While I do believe there is some value to these products, I generally feel that the output from the THIRA and SPR each year does not match the amount of time and effort dedicated to producing them. I agree with another commenter's statement: "The burden of information collection is tremendous, requiring significant amounts of time and subject matter expertise to understand the reporting requirements, develop and disseminate data gathering tools and methodologies, organizing and analyzing data, and finally submitting data gathered in correct format". Unlike a traditional HIRA, the THIRA/SPR is often a subjective process that does not necessarily rely on consistent quantitative data. I don't believe the SPR capability scores can be accurately compared across States or Urban Areas. 2 suggestions for improving THIRA/SPR:
>
> 1) I don't believe this needs to be an annual process. The THIRA currently runs on a 3-year cycle, and I believe FEMA should also move the SPR to a 3-year cycle. Our threats

> and capabilities don't typically change much from year to year (although current DHS grant funding reductions may have a greater impact than usual).
>
> 2) In 2024, FEMA unveiled a proposed new, streamlined methodology update to THIRA/SPR, using qualitative, Likert-scale-based survey questions. The objectives of this new methodology were to a) decrease the burden on communities; b) improve data quality; and c) focus on customer needs. The original plan was to implement this new methodology in 2026, but that does not appear to be the case this year. If FEMA does continue to keep requiring States and UASI to conduct their THIRA/SPR each year, we would strongly prefer that we switch over to this new methodology.

FEMA Response to Comment 13: FEMA appreciates the commenter's feedback regarding the THIRA/SPR information collection, including concerns related to respondent burden, practical utility, methodological consistency, and the frequency of reporting, as well as recommendations to transition to a streamlined, qualitative assessment approach. Consistent with the Paper Reduction Act, FEMA seeks to ensure that information collections are necessary for the proper performance of agency functions, have practical utility, and minimize respondent burden. FEMA acknowledges the concerns regarding the level of effort required to complete annual submissions, challenges in comparing data across jurisdictions, and the perceived limitations of current methodology. FEMA will consider these comments as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to reassess reporting frequency, refine methodology, and improve the utility and comparability of collected information.

Comment 14 (FEMA-2025-0278-0015): Houston Urban Area Security Initiative stated:

> Related to the statutory requirements within the SPR to capture *"(i) an estimate of the amount of expenditures required to attain the preparedness priorities; and (ii) the extent to which the use of Federal assistance during the preceding fiscal year achieved the preparedness priorities."* – while the current methodology contributes useful qualitative insights toward these areas, full alignment with these requirements in a consistent, measurable way remains challenging. In practice, jurisdictions often rely on a combination of available data and subject matter expert (SME) judgment, which can make it difficult to produce precise capability levels across a broad geographical area or clearly attribute outcomes to specific prior-year Federal investments.
>
> Additionally, the process in current state is highly labor-intensive for local and state partners. Significant time and effort are required to gather inputs, coordinate across agencies, and develop capability assessments, yet the resulting outputs do not always translate into actionable or decision-ready information at the local level. This is particularly evident when attempting to define and quantify capability gaps (lost, built,

and sustained in a year) for specific operational capabilities as defined by FEMA, such as a structure fire. This is often based on informed judgment of SMEs but is not structured in a way that would allow for a repeatable, analytical method.

Overall, while the THIRA/SPR process remains valuable for fostering collaboration and providing a structured approach to preparedness assessment, the current methodology does not consistently produce the level of outcomes it is intended to achieve, both in terms of fully supporting statutory expectations and delivering practical value to jurisdictions. There is a clear opportunity to strengthen the process so that it more effectively translates effort into actionable, decision-useful results. **Greater engagement with state, local, tribal, and territorial (SLTT) partners would be critical to this effort to help refine the methodology, reduce unnecessary burden, and ensure the process better addresses current limitations while enhancing its overall utility.**

FEMA Response to Comment 14: FEMA appreciates the commenter's feedback regarding the THIRA/SPR information collection, including observations on its value in supporting coordination and providing a structured approach to preparedness assessment, as well as concerns related to burden, practical utility, and challenges in meeting statutory reporting requirements. Consistent with the Paper Reduction Act, FEMA seeks to ensure that information collections are necessary for the proper performance of agency functions, have practical utility, and minimize respondent burden. FEMA acknowledges the challenges described in producing consistent, measurable assessments across jurisdictions, including reliance on subject matter expertise, difficulty attributing outcomes to specific investments, and the level of effort required to complete submissions. FEMA will consider these comments as part of its ongoing evaluation of the THIRA/SPR information collection, including opportunities to improve clarity of guidance, enhance consistency, reduce burden, and strengthen the utility of collected information for decision-making. FEMA also recognizes the importance of continued engagement with state, local, tribal, and territorial partners in refining the methodology.

A 30-day Federal Register Notice inviting public comments was published on August 21, 2026, 91 FR 54355. The 30-Day public comment period closes on September 21, 2026.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

In 2010, FEMA convened a Reporting Requirements Working Group (RRWG), to conduct an exhaustive accounting of all information required of outside sources, including state and local jurisdictions. The findings of the RRWG indicated that the information gained through this collection represents the sole source of state preparedness data that is necessary to answer the

PKEMRA mandate and to authorize the State Preparedness Report (now known are the State Preparedness Review).

In 2013, FEMA again conducted an analysis to reduce FEMA's preparedness grant reporting requirements. This effort was initiated due to a request from the National Emergency Management Association, and FEMA consulted with the Centers for Disease Control and Prevention and the Department of Health and Human Services to conduct the analysis. FEMA consolidated grant reporting requirements and implemented these changes in 2014.

FEMA consulted with over 20 Federal Departments and Agencies in 2014 to discuss the utility and availability of the information collected, and to share the information so it could be used throughout the Federal Government. Through this effort, FEMA confirmed that other departments and agencies do not have similar data. This effort is ongoing and there is an increasing demand from other departments and agencies to view and use the information gained through this collection. Since 2016, FEMA has shared SPR information with over 50 Federal preparedness partners, and thus the information is widely used across the Federal preparedness community.

In 2017, FEMA consulted with over 150 State, territorial, urban area, and Tribal representatives from over 70 jurisdictions during its technical assistance workshops. Representatives were presented with multiple options for changing the process and were given the opportunity to recommend any changes they felt would improve the process. After this primary engagement, approximately 20 of those jurisdictions opted to continue to participate in the development of the improved methodology. Many of the new changes were adopted directly from stakeholder recommendations.

In 2021, FEMA conducted after-action calls, surveys, and listening sessions of over 120 State, territorial, urban area, and Tribal representatives as well as intra-agency partners to collect feedback on updates to the THIRA/SPR Methodology that would help improve the process.

FEMA also frequently engages with state and local emergency managers who provide the information in this collection to ensure that it captures useful information while reducing the burden as much as possible. FEMA fully explains these activities in item 8(c) below.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

FEMA developed the original SPR methodology in 2010 and 2011 through consultations with state representatives who respond to this information collection. FEMA conducted numerous site visits to state governments throughout the U.S. to discuss this collection and to solicit input for ways to improve the survey while reducing burden. FEMA used the findings from these visits to develop the agenda for a national workshop of state governments, with open invitation to all respondents. This workshop further discussed the collection and specific design considerations. FEMA developed this collection (format, methodology) directly from the input of the respondents themselves.

FEMA holds annual after-action calls every February with all state, territory, urban area, and tribal jurisdictions who complete the THIRA/SPR. FEMA uses this after-action process to gather feedback on the utility of the information and on how the burden can be further reduced. Participation in these calls is voluntary. Participants in the calls are asked to include their time participating in these calls when they respond to questions about hour burden. In 2020, FEMA collected feedback from 57 States and territories, and 10 Tribes through this process.

Additionally, FEMA engages with representatives who provide the information several other times each year. Each of these engagements are included in the respondent hour burden estimate. Some examples of these engagements are provided below:

- FEMA conducts Technical Assistance (TA) each year to train stakeholders on the methodology and collection tool. This training eases burden on stakeholders who provide this information. FEMA provided three in-person TA sessions, spread throughout the U.S, in 2018, paying for jurisdiction’s travel expenses.
- FEMA organizes monthly conference calls with every FEMA Region to answer any questions state and local stakeholders may have as they complete the THIRA and SPR process. Participation in the calls is voluntary.
- FEMA organizes quarterly conference calls with each Urban Area Security Initiative (UASI) partner to answer any questions the UASI’s might have as they compete the THIRA and SPR process. Participation in these calls is voluntary.
- In 2020 and 2021, FEMA provided technical assistance using an alternate live webinar online for jurisdictions due to COVID-19 travel restrictions. The use of the online platform to provide live webinars enabled more than 400 state, territorial, urban area, and tribal representatives, with over 1,100 total attendees to receive training on the THIRA/SPR assessment methodology and collection tool.
- In 2021, FEMA consulted with over 150 state, territorial, urban area, and tribal representatives from over 70 jurisdictions during its technical assistance workshops. Representatives were presented with multiple options for reviewing the current assessment and were given the opportunity to recommend any updates that would improve the process. After this primary engagement, approximately 43 of those jurisdictions opted to continue to participate in the development of the improved methodology and provide feedback through after-action

calls, surveys and listening-sessions.

9. **Explain any decision to provide any payments or gift to respondents, other than remuneration of contractors or grantees.**

There is no offer of monetary or material value for this information collection.

10. **Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.**

The Privacy Threshold Analysis (PTA) was approved by the Department of Homeland Security's (DHS's) Privacy Office on May 13, 2024.

Privacy Impact Assessment (PIA) coverage is provided by DHS/ALL/PIA-006, Department of Homeland Security General Contact Lists and DHS/ALL/PIA-015, Web Portals.

System of Records Notice (SORN) coverage is not needed for this information collection.

11. **Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

12. **Provide estimates of the hour burden of the collection of information. The statement should:**

    a. **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consolation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

See response below under “b” (more than one form in this collection).

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

FEMA Form FF-008-FY-21-106 (formerly 008-019) THIRA/SPR Unified Reporting Tool is estimated to have 39 Tribal Governments respondents once per year for 39 total annual responses. It is estimated that each Tribal Government response will require 290 burden hours to complete, therefore 39 Tribal responses times 290 burden hours equals 11,310 total annual burden hours (39 Tribal responses × 290 hours = 11,310).

FEMA Form FF-008-FY-21-106 (formerly 008-019) THIRA/SPR Unified Reporting Tool is estimated to have 89 urban area respondents once per year for 89 total annual responses. It is estimated that each urban area response will require 869 burden hours to complete, therefore 89 urban area responses times 869 burden hours equals 77,341 total annual burden hours (89 responses × 869 hours = 77,341).

FEMA Form FF-008-FY-21-107 THIRA/SPR After Action Conference Calls is estimated to have 128 respondents once per year for 128 total annual responses. It is estimated that each will require 1.0 burden hour to complete, therefore 128 responses times 1.0 burden hour equals 128 total annual burden hours (128 responses × 1.0 hours = 128).

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.45 (1.62 for State and local government employees) [1] and this total should be entered in the cell for “Avg. Hourly Wage Rate.” The cost to the respondents of contracting out to paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

[1] Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03202026.pdf. Accessed May 15, 2026. The national wage multiplier is calculated by dividing total compensation for all workers of $48.78 by wages and salaries for all workers of $33.45 per hour yielding a benefits multiplier of approximately 1.45. For State and local government employees the wage multiplier is calculated by dividing total compensation for State and local government workers of $65.68 by Wages and salaries for State and local government workers of $40.49 per hour yielding a benefits multiplier of approximately 1.62.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	**Form Name / Form No.**	**No. of Respondents**	**No. of Responses per Respondent**	**Total No. of Responses**	**Avg. Burden per Response (in hours)**	**Total Annual Burden (in hours)**	**Avg. Hourly Wage Rate**	**Total Annual Respondent Cost**
Tribal Government	THIRA/SPR Unified Reporting Tool / FEMA Form FF-008-FY-21-106	39	1	39	290	11,310	$66.05	$747,026
Urban Areas	THIRA/SPR Unified Reporting Tool / FEMA Form FF-008-FY-21-106	89	1	89	869	77,341	$66.05	$5,108,373
State, Local and Tribal Government	THIRA/SPR After Action Conference Calls / FEMA Form FF-008-FY-21-107	128	1	128	1	128	$66.05	$8,454
Total		**256**		**256**		**88,779**		**$5,863,853**

Note: The "Avg. Hourly Wage Rate" for each respondent include a wage multiplier to reflect a fully-loaded wage rate.
"Type of Respondent should be entered exactly as chosen in Question 3 of the OMB Form 83-I.

Instruction for Wage-rate category multiplier: Take each non-loaded "Avg. Hourly Wage Rate" from the BLS website table and multiply that number by 1.45. For example, a non-loaded BLS table wage rate of $42.51 would be multiplied by 1.45, and the entry for the "Avg. Hourly Wage Rate" would be $61.64.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Urban and Regional Planners 19-3051 is estimated to be $45.55 per hour. [2] Including the wage rate multiplier of 1.45, the fully loaded wage rate is $66.05. Therefore, the estimated burden hour cost to respondents Urban and Regional Planners 19-3051 is estimated to be $5,863,853 annually ($66.05 x 88,779 hours).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

[2] Information on the May 2025 National mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at https://www.bls.gov/oes/tables.htm. Accessed May 13, 2026.

Annual Cost Burden to Respondents or Recordkeepers				
Data Collection Activity/Instrument	***Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures**	***Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional services, etc.)**	**Annual Non-Labor Cost (expenditures on training, travel, and other resources)**	**Total Annual Cost to Respondents**
THIRA/SPR (States, territories, urban areas)	0	$13,882,042	$2,313,644	$16,195,686
THIRA/SPR (Tribes)	0	$2,030,106	$338,364	$2,368,470
Total	**$0**	**$15,912,148.00**	**$2,652,008.00**	**$18,564,156**

The cost estimates should be split into two components:

a. **Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including systems and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred**.

Explain:

To calculate the average maintenance costs per response to the THIRA/SPR, FEMA used the estimated burden hours and loaded wage rate to determine the personnel costs and used estimates of how total costs break out between personnel, contracting, and non-labor to determine these other costs. FEMA estimated the breakout using the approved 2018 approach which is a cost breakout of 23 percent personnel, 66 percent contracting, and 11 percent non-labor.

Multiplying the average 869 burden hours per response by the loaded wage rate of $62.55 yields a total personnel cost of $54,356. Using the cost breakouts stated above, dividing $54,356 by 0.23 yields $236,330, representing the average THIRA/SPR development cost per response. Accordingly, contracting costs ($236,330 × 0.66 = $155,978 × 89 responses = $13,882,042) represent the Annual Operations and Maintenance costs and non-labor ($236,330 × 0.11 = 25,996 × 89 responses = $2,313,644) costs represent the Annual Non-Labor costs, totaling **$16,195,686**.

FEMA followed the same procedure to calculate the average maintenance costs per response to the THIRA/SPR data collection for Tribes. Multiplying the average 290 burden hours per response by the loaded wage rate of $62.55 yields a total personnel cost of $18,140. Using the cost breakouts stated above, dividing $18,140 by 0.23 yields $78,870, representing the average

THIRA development cost per response. Accordingly, contracting costs ($78,870 × 0.66 = $52,054) represent the Annual Operations and Maintenance costs, and non-labor ($78,870 × 0.11 = $8,676) represent the Annual Non-Labor costs. Multiplying average development costs by 39 respondents gives a total annual maintenance cost of $3,075,930 ($52,054 × 39 = $2,030,106 + ($8,676 × 39 = $338,364) = **$2,368,470**.

The total cost to respondents and record keepers (including operations/maintenance and non-labor costs) is **$16,195,686 + $2,368,470**, which equals **$18,564,156.**

b. Capital and Start-Up Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storge facilities.

There are no capital and start-up costs associated with this information collection. To determine operation and maintenance costs, FEMA calculated for the THIRA/SPR and information collection for all jurisdiction types. FEMA summed the costs associated with the THIRA and SPR to calculate the total costs. Participation in after action calls is included with each estimate.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government	
Item	**Cost ($)**
Contract Costs:	$1,026,277
Staff Salaries1: 1 GS 14, step 5 and 2 GS 12 step 5 employees spending 100 % of time annually as well as, 1 GS 13 step 5, 1 GS 12 step 5, and 1 GS 11 step 5 spending approximately 50% of their time supporting the THIRA/SPR ($163,104 + $116,071 + $116,071) x 1.45 =$573,107) + ((($138,024 + $116,071 + $96,843) x 0.5) x 1.45 =$254,430)	$827,537
Facilities [cost for renting, overhead, etc. for data collection activity]	$0
Computer Hardware and Software [cost of equipment annual lifecycle]	$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	$431,703
Travel (not to exceed)	$150,000
Total	**$2,435,517**

[1] Office of Personnel Management 2026 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DCB.pdf. Accessed January 09, 2026.
[2] Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A ***"Program increase"*** *is an additional burden resulting from a Federal Government regulation action or directive (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collection discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.*

A ***"Program decrease"*** *is a reduction in burden because of: (1) the discontinuation of an information collection, or (2) a change in an existing information collection by a Federal Agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).*

An ***"Adjustment"*** *denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.*

Itemized Changes in Annual Burden Hours						
Data Collection Activity / Instrument	Data Collection Activity / Instrument	Data Collection Activity / Instrument	Data Collection Activity / Instrument	Data Collection Activity / Instrument	Data Collection Activity / Instrument	Data Collection Activity / Instrument
THIRA/SPR Unified Reporting Tool / FEMA Form FF-008-FY-21-106				39	39	0
THIRA/SPR Unified Reporting Tool / FEMA Form FF-008-FY-21-106				89	89	0
THIRA/SPR After Action Conference Calls / FEMA Form FF-008-FY-21-107				128	128	0
Total				**256**	**256**	**0**

Explain: There were no changes in burden hours.

Itemized Changes in Annual Burden Hours						
Data Collection Activity / Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
THIRA/SPR Unified Reporting Tool / FEMA Form FF-008-FY-21-106				$626,122	$747,026	$120,904
THIRA/SPR Unified Reporting Tool / FEMA Form FF-008-FY-21-106				$4,281,598	$5,108,373	$826,775
THIRA/SPR After Action Conference Calls / FEMA Form FF-008-FY-21-107				$7,086	$8,454	$1,368
Total	**$0**	**$0**	**$0**	**$4,914,806**	**$5,863,853**	**$949,047**

Explain: Burden costs increased by $949,047 due to wage increases published by the Bureau of Labor Statistics.

16. **For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

There are no outline plans for tabulation and publication of data for this information collection

17. **If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.**

This collection does not seek approval to not display the expiration date for OMB approval.

18. **Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submission,” of OMB Form 83-I.**

This collection does not seek exception to Certification for Paperwork Reduction Act submissions.
Choose an item.