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Comment Submitted by Washington State Emergency Management Division

Posted by the **Federal Emergency Management Agency** on Mar 4, 2026

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Comment

I am writing in response to the request for comment regarding the THIRA/SPR process and reporting burden.

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.

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