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Comment Submitted by NYS DHSES

Posted by the **Federal Emergency Management Agency** on Mar 10, 2026

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Comment

Thank you for the opportunity to provide comments on the Threat and Hazard Identification and Risk Assessment (THIRA)/Stakeholder Preparedness Review (SPR) Unified Reporting Tool. 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.

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