FEDERAL REGISTER NOTICE

Agency Information Collection Activities: Proposed Collection, Comment Request, Threat and Hazard Identification and Risk Assessment (THIRA)/Stakeholder Preparedness Review (SPR) Unified Reporting Tool

Evaluate whether the proposed data collection is necessary for the proper performance of the agency, including whether the information shall have practical utility:
Since the inception of the THIRA/SPR reports, the California Governor's Office of Emergency Services (Cal OES) has served as the lead agency for the production and submission of California's THIRA/SPR. **While informative, the information generated through the THIRA and/or SPR has been challenging to apply in a practical context.** The identification of threats and hazards to the state is essential for preparedness and the expansion of information sharing for all SLTT entities. Yet, the quantitative application found in THIRA/SPR is generally obsolete. In part, this is because entities, such as Cal OES, regularly identify threats and hazards to the state, where they are planned for an exercised against in our day to day operations.

Although the target capability language provides a specific goal within each core capability, **the targets do not consistently align with the state's needs, gaps, challenges, or successes**. For example, the state may maintain 100 percent capability in the target language (such as planning) but may be deficient in another aspect of the planning capability. Thus, **the rigidity of the core capability target language inhibits the utility of this report for California, and likely other states.** Moreover, these target capabilities are heavily reliant on data tools that may not collect/create a holistic picture presented by the target capability language.

Due to the geographic size and extensive number of SLTT partners within California (7,000+ unique organizations), **it is nearly impossible for California to gather all of these stakeholders, generating a truly holistic and comprehensive product. In short, THIRA/SPR places a larger, and arguably significant, burden on geographically large or populous states to produce this report**.

The identification of a goal (target) and the subsequent measurement of the progress towards meeting the established THIRA goal is incredibly difficult and likely has a significant margin of error. This is further complicated when examined from the county or local level due to a wide range of available resources. Currently, the report does not provide guidance on how to average or determine the state's capability with significant capabilities differences across the state. *It should be noted Cal OES is not advocating for county or level assets for every capability*. Cal OES would like to emphasize, requiring county and/or local jurisdictions to complete the THIRA/SPR would likely create a significant burden on smaller, local jurisdictions. Requiring THIRA/SPR by all jurisdictions throughout the state would necessitate considerable staff hours, which in turn could tie up crucial funding at the local level that could be spent preparing for and mitigating against threats and hazards.

For the SPR, **the practical value of the capability-change descriptions for decision-making purposes is limited.** In the 2025 iteration of the THIRA/SPR, California stakeholders found the most utility in identifying actual or potential gaps and current plans to address these gaps for their respective organizations. Due to the size and scale

of California, it is nearly impossible to identify all gaps experienced and identified by SLTT entities throughout California and subsequently develop comprehensive plans to address these gaps across this diverse group.

By focusing goals on a specific scenario that is generally restricted to a singular geographic region**, the current methodology provides a very restrictive and potentially misleading picture of California's capabilities.**

Much of California's aforementioned challenges were corroborated in the 2020 Government Accountability Office report titled "Additional Actions Needed to Address Gaps in the Nation's Emergency Management Capabilities."

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:

Since 2022, the burden of work to collect data encompassing 40 million residents, millions of visitors, 14,000-plus SEAR events, 58 counties, more than 400 cities and 3,000 special districts, nearly 7 fusion centers, dozens of state entities, and 6 UASIs **is estimated to be more than 1,000 hours** across a very small division at Cal OES. *This does not include the six California UASI THIRA/SPR burden of work.*

The approximate 1,000-hour estimate is derived from 2025 when both the THIRA and SPR were due. The estimate was created through a count of staff hours expended on the various components of THIRA/SPR, including counting meeting hours, phone calls, emails, administrative actions (such as scheduling meetings), and the time needed for writing. These hours only reflect the team managing and writing the THIRA and SPR, and do not account for the hours the stakeholders who provided content and input committed to the project. If these hours were included, the hour estimate would be significantly more.

In SPR-only years, the burden of work estimate is a bit lower at approximately 600-700 hours. Even with efforts to make the process more efficient, due to the size of California, the number of SLTT entities to include, and the sheer number of core capabilities requiring assessment, the burden of work remains high.

One of the most striking, and potentially concerning, elements of the THIRA/SPR are the numerous assumptions relied upon to craft a statewide image. The mathematical methodology introduced in federal fiscal year (FFY) 2023 was meant to reflect the current threat environment and create a "simpler and more transparent" view of the threat landscape. Rather, **this methodology leaves emergency managers, homeland security, and cybersecurity managers confused and unable to quantify information that is inherently qualitative.** Disasters and man-made threats rarely playout in the ways our books and trainings detail. While our exercises may give us an example of how we can respond, it is simply impossible to exercise for every scenario that might play out. It is easy for an entity to quantify the number of fire trucks available within the mutual aid system, and the number of fatalities one facility can handle. Yet the variables of strength, magnitude, and psychological impact cannot truly be measured no matter how good HAZUS and predictive models may be. This requires an incredible amount of assumption on the part of subject matter experts with little to no guidance from FEMA.

Moreover, there is little technical assistance available to THIRA/SPR subject matter experts to understand the information FEMA may be seeking.

Enhance the quality, utility, and clarify the information to be collected:
It is clear is that a "one-size fits all" approach may not be what is best for larger states such as California. Moreover, expecting smaller states to detail the same type of information, each with their own unique needs, may not be productive for their THIRA/SPR process.

This document is meant to be living, and to be multi-purpose. For example, in California, the THIRA/SPR feeds multiple documents, and vice versa. These documents include the California Homeland Security Strategy, the Integrated Preparedness Plan, Emergency Support Function annexes, many of the catastrophic plans, and the State Emergency Plan. **While this functionality is incredible, the quantitative methodology required within THIRA/SPR makes it difficult for SMEs of these complimentary documents to extract the necessary qualitative data for their reports.** To ensure a holistic approach to the State's capabilities and gaps as it relates to catastrophic scenarios, qualitative and quantitative data, *together*, are required. Where quantitative data may lack all the facts, the qualitative data often supports, shedding light where needed, and vice versa. In some cases, the THIRA/SPR provide opportunities to expand on quantitative data. However, if taking numbers detailed in these reports at face value, there is potentially misleading and/or misrepresentation of a state's true capabilities.

In a similar vein, several capabilities targets require states to identify information that may not be relevant to their state's composition. For example, several capability targets ask states to identify the number of publicly managed and/or regulated critical infrastructure facilities. The Cybersecurity and Infrastructure Security Agency (CISA) notes that the private sector owns and operates a majority of our nation's critical infrastructure; this rings true in California. Therefore, when assessing this capability, it is difficult for California to provide an answer that provides the federal government with an accurate picture. While California state agencies maintain excellent relationships with all 16 critical infrastructure sector partners, "requiring" these entities to share information is not possible. Again, this methodology leaves emergency managers, homeland security professionals, and cybersecurity managers confused and unable to quantify information that is outside the scope of the state.

Minimize the burden of collection of information on those who are to respond, including through the use of appropriated, automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.
Currently, FEMA uses the "Unified Reporting Tool" (URT) for the intake of yearly THIRA/SPR submissions. While electronic data collection and reporting mechanisms remain in place through the URT, this tool is limited, difficult to navigate, and often crashes, "kicking out" users when inputting data. In 2023, FEMA hosted an in-person training to guide THIRA/SPR submitters or their designees through the process. In a two-day class, THIRA/SPR analysts and submitters attending the class spent nearly six hours working through how to input information into the URT. This included bringing the lead URT designer (a private sector contractor) to the event to "walk through" URT input. Analysts

who attended this training noted that while it was somewhat helpful, there was admission of the "clunkiness" of and gaps within this tool, which are substantial.

During the 2025 THIRA/SPR process, submitters, on behalf of Cal OES, were unable to upload information simultaneously. This drastically increased the burden of work, and time spent submitting the required information. For the State's THIRA/SPR submission there are no less than three subject areas that submit information – one for CPG 101 requirements, one for THIRA/SPR, and another related to Senior Advisory Committee responsibilities and requirements. This means that none of these teams, across a relatively large agency, can input information simultaneously.

California recommends that FEMA evaluate the following items, and provide states the opportunity to offer input and/or feedback on a THIRA/SPR redesign

- **Recommendation:** Redesign, or offer an alternative, THIRA/SPR to accommodate state population, geographic size, critical infrastructure, etc.
    - As noted previously, population, geographic location and size, number of hazards, critical infrastructure, and more, play a huge role in the quantitative and qualitative approach to each state's THIRA/SPR.
    - Providing an alternative avenue for reporting would eliminate the "one size fits all approach."
- **Alternative Recommendation:** Consider the geographic size and number of partners needed in the design of the THIRA/SPR.
    - In its current structure, there are too many stakeholders to create a holistic picture for larger states, limiting accuracy
    - This results in a very restricted or potentially misleading picture of California's capabilities as it focuses on one local or regional area that is impacted.
    - Moreover, this eliminates other, smaller areas from enumerating their needs and challenges as they are overshadowed by events happening in another geographical area.
- **Recommendation:** Allow states to focus on 13 capabilities/sub-capabilities during each year of the three-year THIRA cycle, to lessen the burden of work on subject matter experts.
    - In its current structure, subject matter experts are asked to assess numerous capability targets, often creating information fatigue.
    - By allowing states to focus on one-third of the capabilities set forth by FEMA, stakeholders could provide a more holistic, inclusive, and detailed account of gaps, challenges, successes, and maintenance throughout the year.
- **Alternative Recommendation:** Allow states to focus on one component of a capability rather than multiple.
    - Capability targets are helpful, but they are too rigid in their current format.

- Further, the rigidity of these targets decreases the utility for subject matter experts, emergency managers, entities within the homeland security enterprise, and decision makers throughout the state.
- Requiring states to focus on multiple components within a capability, which are often conflicting, leave subject matter experts feeling confused and unable to quantify their needs in an area that would be best explained qualitatively.