

Thank you for the opportunity to provide input on the THIRA/SPR Unified Reporting Tool under OMB Control Number 1660-0131.

We want to be direct: 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.

We strongly encourage FEMA to take substantive action on these concerns rather than continuing to rely on a process that has been repeatedly identified as flawed.

Thank you for your consideration.

