

Comment on Docket ID FEMA-2026-0025: Threat and Hazard Identification and Risk Assessment (THIRA)/Stakeholder Preparedness Review (SPR) Unified Reporting Tool

Thank you for the opportunity to provide comment on the proposed information collection for the THIRA/SPR Unified Reporting Tool.

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.

Maryland appreciates the opportunity to provide input and stands ready to partner with FEMA in developing a more effective and sustainable approach.