



Oregon

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(a) Evaluate whether the proposed data collection is necessary for the proper performance of the Agency, including whether the information shall have practical utility

The THIRA/SPR process led by the Federal Emergency Management Agency intends to measure how prepared states are for human-caused, natural, or technological threats, but the current use of state capability targets offer limited practical utility. Quantitative, scenario-based targets are too abstract and do not translate into actionable planning, investment, or operational decisions. As a result, the process functions mainly as a compliance exercise.

A shift to Likert-scale or capability maturity assessments would better reflect real-world conditions and provide more meaningful insight. Eliminating state capability targets would allow the process to focus on actionable gaps and trends.

(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 is underestimated mainly because of reliance on a flawed quantitative methodology. Developing capability targets requires significant coordination but relies on subjective and inconsistent data. The assumption that jurisdictions can accurately quantify capabilities is not realistic.

Moving to a qualitative, Likert-scale approach and eliminating state targets would reduce burden while improving consistency and credibility.

(c) Enhance the quality, utility, and clarity of the information to be collected

Quality and utility would improve by:

- Eliminating state capability targets
- Shifting to Likert-scale or maturity-based assessments
- Aligning with the Planning, Organizing, Equipping, Training, and Exercise (POETE) framework and real-world performance data (incidents, exercises)
- Providing clearer guidance and flexibility for regional differences

These changes would produce more actionable, comparable, and understandable data.

(d) Minimize the burden of the collection of information on those who are to respond

Burden can be reduced by:

- Removing quantitative target requirements
- Leveraging existing state/local assessment data
- Using simplified, qualitative inputs
- Improving electronic tools for data reuse and integration, allowing for carryover of all data from year to year.

Summary

The issue is both the state capability targets and the broader THIRA/SPR methodology, which relies on unrealistic quantitative assumptions. Eliminating targets and shifting to qualitative, maturity-based assessments would reduce burden and make the process more useful for improving preparedness.