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Comment Submitted by Chicago Office of Emergency Management and Communications

Posted by the **Federal Emergency Management Agency** on Apr 14, 2026

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While I do believe there is some value to these products, I generally feel that the output from the THIRA and SPR each year does not match the amount of time and effort dedicated to producing them. I agree with another commenter's statement: "The burden of information collection is tremendous, requiring significant amounts of time and subject matter expertise to understand the reporting requirements, develop and disseminate data gathering tools and methodologies, organizing and analyzing data, and finally submitting data gathered in correct format". Unlike a traditional HIRA, the THIRA/SPR is often a subjective process that does not necessarily rely on consistent quantitative data. I don't believe the SPR capability scores can be accurately compared across States or Urban Areas. 2 suggestions for improving THIRA/SPR:

- 1) I don't believe this needs to be an annual process. The THIRA currently runs on a 3-year cycle, and I believe FEMA should also move the SPR to a 3-year cycle. Our threats and capabilities don't typically change much from year to year (although current DHS grant funding reductions may have a greater impact than usual).
- 2) In 2024, FEMA unveiled a proposed new, streamlined methodology update to THIRA/SPR, using qualitative, Likert-scale-based survey questions. The objectives of this new methodology were to a) decrease the burden on communities; b) improve data quality; and c) focus on customer needs. The original plan was to implement this new methodology in 2026, but that does not appear to be the case this year. If FEMA does continue to keep requiring States and UASI to conduct their THIRA/SPR each year, we would strongly prefer that we switch over to this new methodology.

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