

October 29, 2026

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-0118

**Title: Homeland Security Exercise and Evaluation Program (HSEEP)
Documentation**

Form Number(s):

- 1) FEMA Form FF-008-FY-21-102 (formerly 091-0-1), After Action Report/Improvement Plan (AAR/IP);**
- 2) FEMA Form FF-008-FY-21-100 (formerly 008-0-26), Integrated Preparedness Plans (IPPs);**
- 3) FEMA Form FF-008-FY-21-101 (formerly 008-0-27), National Exercise Program (NEP) Support Request Form**

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(1)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

- 1. Explain the circumstances that make the collection of information necessary.**

Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

The National Preparedness Goal (NPG) identifies the core capabilities necessary for preparedness and the National Preparedness System (NPS) guides activities that will enable the nation to achieve the NPG. The NPS will allow the nation to track the progress of our ability to build and improve the capabilities necessary to prevent, protect against, mitigate the effects of, respond to, and recover from those threats that pose the greatest risk to the security of the nation.

The Homeland Security Exercise and Evaluation Program (HSEEP) is a key part of the “Validating Capabilities” component of the NPS. In order for this component to operate properly at the national level, the National Exercise Program Support Request Forms are necessary to nominate exercises of national significance into the National Exercise Program. The National Exercise Program is a requirement of Section 648(b)(1) of the Post-Katrina Emergency Reform Act of 2006, Pub. L. 109-295 (6 U.S.C. 748(b)(1)) which states that the Administrator of the Federal Emergency Management Agency (FEMA) “shall carry out a national exercise program to test and evaluate the national preparedness goal, National Incident Management System, National Response, and other related plans and strategies.” Additionally, Integrated Preparedness Plans and After Action Report/Improvement Plans are required to partially assess grantee progress towards the NPG.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

FEMA Form FF-008-FY-21-102 (formerly 091-0-1), After Action

Report/Improvement Plan (AAR/IP) - FEMA requires these plans to be submitted as evidence from grantees that they have validated the preparedness capabilities of the nation. This information is used to create trend analysis documents and also informs the National Preparedness Report.

FEMA Form FF-008-FY-21-100 (formerly 008-0-26), Integrated Preparedness Plans (IPPs) – FEMA uses these plans submitted by grantees to better understand and support the priorities of grant recipients.

FEMA Form FF-008-FY-21-101 (formerly 008-0-27), National Exercise Program (NEP) Support Request Form – FEMA uses this request form to select the most significant exercises in the nation for inclusion into the National Exercise Program.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

All information is collected through email. The After Action Report/Improvement Plans, FEMA Form FF-008-FY-21-102 (formerly 091-0-1) and the Integrated Preparedness Plans, FEMA Form FF-008-FY-21-100 (formerly 008-0-26) are available for download from <https://www.fema.gov/hseep> and the NEP Support Request Form, FEMA Form FF-008-FY-21-101 (formerly 008-0-27) is available for download from <https://www.fema.gov/nep>.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The After Action Report/Improvement Plans, FEMA Form FF-008-FY-21-102 exists as the single report for an exercise's capability performance and improvement planning. This information is not collected in any other form and therefore is not duplicated elsewhere.

The Integrated Preparedness Plans, FEMA Form FF-008-FY-21-100 is also a single report produced annually that identifies a jurisdiction's exercise program priorities. This information is not collected in any other form and therefore is not duplicated elsewhere.

The NEP Support Request Form, FEMA Form FF-008-FY-21-101 is the only mechanism for a jurisdiction to nominate an exercise into the NEP. This information is not collected in any other form, and therefore is not duplicated elsewhere.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

This information collection does not have a significant impact on small businesses. Small entities such as local governments have burden reduction through their State as State sponsorship is required for a NEP nomination, and IPP and AAR/IP are requirements of grants primarily managed by State entities and issued to local governments as sub-grants.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Without the information provided in the After Action Report/Improvement Plans, FEMA Form FF-008-FY-21-102, the ability of FEMA to assess and validate the current national preparedness capabilities would be diminished. Additionally, without the information from Integrated Preparedness Plans, FEMA Form FF-008-FY-21-100 as well as the NEP Support Request Form, FEMA Form FF-008-FY-21-101 the ability of FEMA to provide support to state, local, Tribal, and territorial governments would be diminished. FEMA is better positioned to understand progress toward the NPG as a result of the collection.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner (See 5 CFR 1320.5(d)(2)):

a. Requiring respondents to report information to the agency more often than quarterly.

This information collection does not require respondents to report information more than quarterly.

b. Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

This information collection does not require respondents to prepare a written response in fewer than 30 days after receipt of it.

c. Requiring respondents to submit more than an original and two copies of any document.

This information collection does not require respondents to submit more than an original and two copies of any document.

- d. Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**

This information collection does not require respondents to retain records (other than health, medical, government contract, grant-in-aid, or tax records) for more than three years.

- e. In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.**

This information collection does not include a statistical survey.

- f. Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**

This information collection does not use a statistical data classification that has not been reviewed and approved by OMB.

- g. That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**

This information collection does not include a pledge of confidentiality that is not supported by established authorities or policies.

- h. Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This information collection does not require respondents to submit trade secrets or other confidential information.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on June 17, 2026, at 91 FR 36605. Four public comments were received. FEMA appreciates the commenters’ support for maintaining the HSEEP Documentation information collection and recognition of the continued value of HSEEP in supporting consistent exercise design, conduct, evaluation, after-action reporting, improvement planning, grant accountability, and national preparedness analysis. Commenters emphasized that HSEEP templates and documentation help validate preparedness capabilities, support trend analysis, and encourage participation and accountability across components, jurisdictions, and exercise partners. FEMA also acknowledges concerns that current HSEEP templates can be difficult to manipulate, may require duplicative data entry across documents, and can create administrative burden through formatting, reconciliation, and document-management tasks, particularly for smaller or less-resourced exercise programs. In future revisions to this collection, FEMA will consider the recommendations to simplify and modernize HSEEP templates, reduce redundant content across Exercise Plan/Situation Manual, Controller/Evaluator, EEG, and AAR/IP materials, provide clearer minimum documentation guidance for each of the seven exercise types, and support scalable approaches such as simplified forms, digital submission, reusable structured data, conditional fields, and responsible AI use. FEMA notes that the [Homeland Security Exercise and Evaluation Program](#) (HSEEP doctrine) emphasizes flexibility, scalability, and the appropriate documentation based on exercise purpose and scope. FEMA’s current collection allows electronic submission, and tools such as the Preparedness Toolkit and Exercise Builder support exercise planning, conduct, evaluation, and documentation. No change to the information collection burden estimate is proposed based on these comments, but FEMA will consider the feedback in future updates to HSEEP doctrine, templates, forms, supporting tools, and burden analyses.

Comment 1 (FEMA-2026-0298-0002):

For consideration: The HSEEP documents are a great beginning and have been a standard for years. However, they need to be more able to be manipulated without losing the format. There are so many duplicated and redundant sections in the EXPlan/SitMan, Controller/Evaluator docs, and the AAR. I went to much simpler

forms like the placement (Created by the US Coast Guard in my MEP cohort) and a simple AAR template with all of the 32 Core Capabilities built in to delete what you don't want (see attached). I love standards, but I also appreciate simple standards. HSEEP is not scalable and flexible like ICS, and it can be.

I would love to see a more in-depth discussion on each of the 7 exercise types and the minimum paperwork to go with each. Also teaching digital forms and AI use.

FEMA Response to Comment 1: FEMA agrees that exercise documentation should be practical, scalable, and easy to adapt without creating unnecessary duplication. The HSEEP doctrine emphasizes that HSEEP is optional guidance, not a compliance requirement, and that practitioners may adapt tools and templates to meet the needs of their jurisdiction or organization. The doctrine also reinforces “right-sizing” exercises based on purpose, scope, type, participation level, duration, location, and resources. No change to the information collection is being made based on this comment, but FEMA will consider the feedback in future revisions of HSEEP guidance, templates, and supporting tools.

Comment 2 (FEMA-2026-0298-0003):

4C North America appreciates the opportunity to provide comments on FEMA’s proposed extension of the Homeland Security Exercise and Evaluation Program (HSEEP) Documentation information collection, including the After Action Report/Improvement Plan, Integrated Preparedness Plan, and National Exercise Program Support Request Form.

We support FEMA maintaining this information collection. HSEEP documentation provides an important mechanism for capturing exercise results, assessing preparedness capabilities, identifying strengths and areas for improvement, and supporting future preparedness planning. The continued collection of this information is valuable to state, local, and tribal respondents, as well as to FEMA’s broader preparedness, grant, exercise, and corrective-action programs.

At the same time, we recommend that FEMA continue to encourage the use of structured digital methods for collecting, managing, and reporting HSEEP-related information. In our experience, electronic data collection methods that are easier to complete than structured manual forms can improve response quality while reducing administrative burden on respondents. Rather than requiring users to assemble exercise documentation manually from notes, spreadsheets, emails, and separate templates after an event, digital methods can allow information to be captured during the exercise planning, conduct, evaluation, hotwash, and

improvement-planning process.

Structured digital collection can provide several benefits:

- Less manual burden on state, local, and tribal respondents.
- Better traceability from exercise objectives to observations, corrective actions, and improvement plans.
- More consistent reporting across the 32 core capabilities and community lifelines.
- Improved management of FEMA preparedness, grant, exercise, and corrective-action programs.
- Better longitudinal analysis across exercises, jurisdictions, and reporting cycles.

We recommend that FEMA preserve the HSEEP documentation collection and continue to support approaches that allow respondents to capture information electronically, reuse structured data, and generate formatted AAR/IP and related outputs from the information collected. This approach would maintain the value of the current collection while improving clarity, consistency, traceability, and ease of completion for respondents.

FEMA Response to Comment 2: FEMA agrees that HSEEP documentation is an important mechanism for capturing exercise results, assessing capabilities, identifying strengths and areas for improvement, and supporting preparedness planning and corrective-action activities. FEMA also acknowledges the commenter's recommendation to continue encouraging structured digital methods that improve traceability from objectives to observations, recommended actions, and improvement plans, support more consistent reporting, and reduce respondent burden.

The current collection allows respondents to submit information electronically by email, and FEMA's Preparedness Toolkit and Exercise Builder provide additional capabilities to support exercise planning, conduct, evaluation, and documentation. No change to the information collection is being made based on this comment, but FEMA will consider opportunities to further support electronic capture, reuse of structured data, and generation of formatted AAR/IP, IPP, and related outputs in future revisions.

Comment 3 (FEMA-2026-0298-0004):

I am a continuity and exercise planner for a federal entity, using the HSEEP model for all exercises beyond annual Occupant Emergency Plan testing. I have used and taught HSEEP since 2008, most often developing tabletop exercises for

threats such as active shooters, hurricanes, and other disruptive incidents to which my component is regularly exposed.

It is already difficult enough to ensure that personnel who are trained, knowledgeable, and proficient in the HSEEP methodology are available to serve as evaluators or planning team members. We encounter a distinct lack of HSEEP trained or familiarized personnel with nearly every exercise, both within our own component and within the surrounding local jurisdictions with whom we partner for bilateral exercise support. We are required to build exercises based upon extremely limited information, exercise partners who do not understand the methodology or reasons for the data and production timeline we request, and a distinct lack of supporting funding. Most units requesting exercises want only to perform the exercise. They will not have the personnel available to assist with scoping, developing, or constructing it. They will not have personnel available for evaluating, controlling, or facilitating it. They will not be readily available when it comes to developing and refining the After-Action Report / Improvement Plan. Having associated HSEEP templates assists us in developing, producing, providing, evaluating, and assessing exercises and overall performance; of this, there is absolutely no question. The leverage that most frequently allows us to spur the unwilling participants to provide the elements we need to create a fact-based, realistic, capability-testing exercise is that "this exercise will need to be submitted to the Exercise Coordination Group in order to be considered a valid exercise" for the component. Having a collection point above the component level which can aggregate exercises and act as a repository for additional, national level data mining is by far the most important driver behind gaining cooperation, assistance, funding, and information for exercise development at our component level.

We recognize the collection feature as HSEEP's greatest potential asset but also acknowledge that limited FEMA staffing and the absence of a system to populate, parse, correlate, and report AAR/IP data threaten this feature's effectiveness. Historically, too few personnel have been involved in collecting post-exercise assessment data, dating back to the Lessons Learned Information Sharing (LLIS) database days. This has prevented submitted data from being easily cataloged and extracted for macro-level insights. While more personnel are needed, there is a distinct need for an input source that eases the burden of submitting data to FEMA. A simple system, such as a Microsoft Form, allowing users to answer questions or input data that can be accumulated and deconstructed as needed, is the type of process that should be considered for submission standards. This would also help jurisdictions standardize their processes as they become familiar with the data categories and submission procedures.

The development of EEGs is consistently the most difficult part of the process. Associating EEG elements with target categories (e.g., ICS, Fire Management, On-Scene Security, Law Enforcement, Mass Search and Rescue, Public Health, Healthcare, Emergency Medical Services, Initial Command Decisions, Staging, Supporting Resources, Safety, etc.) would make the process for novice EEG builders more manageable and less overwhelming. This would lead to better evaluation tools, improved evaluations, richer datasets, and ongoing improvement and information sharing.

I recognize that costs will be associated with these system improvements. The current process is exceptionally labor intensive for FEMA personnel to delineate into functional datasets. A submission system that allows documents to be uploaded while also identifying specific datasets from the outset would benefit both database administrators and users. Identifying objectives within threat types could assist others in developing objectives at their level. Historically, most agencies do not consistently pursue their improvement plans into the next exercise cycle. A submission system that aggregates mass data for reference and houses component or unit-level data to track improvements (visible only to component representatives and select users) could lend credibility to any Improvement Program.

I appreciate FEMA's efforts to ensure the outcome of the HSEEP process is as valid and supported as its other elements. The development of standardized templates was crucial in socializing HSEEP during its early years. It is now time for the next major improvement, focused on the outcome and relevant data generated by the process.

FEMA Response to Comment 3: FEMA acknowledges the operational challenges described by this commenter, including limited availability of HSEEP-trained personnel, constrained funding, and difficulty obtaining planning, evaluation, control, facilitation, and after-action support from exercise partners. FEMA agrees that HSEEP templates and documentation support consistent exercise design, evaluation, and improvement planning, and that a collection point for exercise documentation can help reinforce accountability, support program visibility, and enable broader preparedness analysis. FEMA also appreciates the recommendations to improve electronic submission, structured data capture, AAR/IP data aggregation, improvement plan tracking, and Exercise Evaluation Guide development. FEMA recognizes that structured digital tools and standardized data categories could reduce burden, improve evaluation quality, strengthen traceability from objectives to observations and recommended actions, and support trend analysis across exercises, threats, capabilities, and jurisdictions. FEMA will

consider these recommendations as it continues to review HSEEP documentation, templates, and supporting systems, including opportunities to improve data submission, parsing, reporting, and user support for developing EEGs. No change to the information collection burden estimate is proposed based on this comment, but FEMA will consider the feedback in future updates to HSEEP guidance, templates, and related tools.

Comment 4 (FEMA-2026-0298-0005):

While HSEEP establishes an important national preparedness standard under 6 U.S.C. § 748(b)(1), its information collection instruments—static templates for the Exercise Plan (EXPlan), Situation Manual (SitMan), Controller/Evaluator (C/E) Handbook, and After-Action Report/Improvement Plan (AAR/IP, FEMA Form FF-008-FY-21-102)—suffer from structural redundancies, user-interface rigidity, and an absence of scalable architecture. These defects artificially inflate administrative burden on state, local, tribal, and territorial (SLTT) practitioners in direct violation of the Paperwork Reduction Act (PRA, 44 U.S.C. § 3506(c)(2) (A)), 5 CFR § 1320.5(d)(1), and 5 U.S.C. § 706(2)(A).

FEMA's collection design exhibits four fatal defects: intra-suite redundancy forcing repetitive data entry across 4 to 6 separate files (violating 44 U.S.C. § 3506(c)(1)(B)); rigid templates shifting practitioner labor from substantive evaluation to uncounted document formatting and table repair (omitted under 5 CFR § 1320.3(b)(1)); failure to offer a scalable tier analogous to the Incident Command System (ICS); and arbitrary refusal to consider proven operational models like the U.S. Coast Guard Master Exercise Practitioner (MEP) placemat architecture under **State Farm**, 463 U.S. 29, and **DHS v. Regents**, 140 S. Ct. 1891. Pursuant to 5 U.S.C. § 553(c) and 5 CFR § 1320.11, FEMA and OMB must provide reasoned, record-backed responses to these defects prior to seeking final collection approval.

FEMA's published estimate of 14,458 annual burden hours across 471 responses (~30.7 hours per response) severely understates actual SLTT labor. Field audits show practitioners expend up to 80% of development cycles on clerical formatting, margin repair, and narrative reconciliation, leaving only 20% for scenario design. Minor adjustments to timing or rosters require 3 to 5 uncounted administrative hours per package to fix broken table layouts across the SitMan, C/E Handbook, and EXPlan, rendering the baseline arbitrary under 44 U.S.C. § 3506(c)(1)(A)(iv).

Formal inquiry

1. What specific time-motion logs or field studies did FEMA rely upon to

- establish that completing the HSEEP documentation suite requires only ~30.7 burden hours per response under **State Farm**, 463 U.S. at 43?
2. How did FEMA quantify the non-analytical burden hours SLTT planners expend troubleshooting corrupted table formatting, broken XML tags, and cell misalignments across EXPlan, SitMan, EEG, and C/E documents, and under what authority was this omitted under 5 CFR § 1320.3(b)(1)?
 3. What technical milestones and implementation schedules has FEMA established to transition from static Word packages to a single-source relational data architecture (analogous to the USCG MEP placemat model) to eliminate redundant entry under 44 U.S.C. § 3506(c)(1)(B)?
 4. What is FEMA's formal justification under 5 CFR § 1320.5(d)(1) and **DHS v. Regents**, 140 S. Ct. at 1913, for applying a monolithic reporting suite to tabletop exercises (TTXs) rather than offering a scalable "HSEEP-Lite" tier modeled on ICS Form 201?
 5. Has FEMA evaluated embedding conditional schema logic (such as pre-populated toggles for all 32 Core Capabilities) into FEMA Form FF-008-FY-21-102 to eliminate formatting failures when removing unexercised capabilities pursuant to 44 U.S.C. § 3504(h)?

FEMA Response to Comment 4: FEMA appreciates the commenter's detailed feedback on the usability, scalability, and burden associated with HSEEP documentation. FEMA recognizes that static templates can create challenges for some users, including duplicate data entry, formatting issues, and difficulty tailoring documentation to smaller or less complex exercises. FEMA also acknowledges the recommendation to consider more scalable documentation approaches, including simplified or "HSEEP-Lite" options, single-source data entry, conditional fields, digital forms, and models similar to the U.S. Coast Guard Master Exercise Practitioner placemat approach. FEMA will consider these recommendations as it continues to review HSEEP templates, forms, and supporting tools.

FEMA is submitting this information collection to the Office of Management and Budget for review and clearance in accordance with the requirements of the Paperwork Reduction Act of 1995. The information collection covered by this notice includes only the AAR/IP, Integrated Preparedness Plan, and National Exercise Program Support Request Form. HSEEP doctrine and supporting templates are intended to be flexible and adaptable, and the expanded use beyond these required documents for grant recipients and exercise support applicants, is optional guidance, not a compliance requirement. Practitioners may tailor documentation based on exercise purpose, type, scope, participation level, duration, location, and available resources. The doctrine also discusses the seven exercise types, includes an exercise type planning decision tree, and emphasizes right-sizing exercise design and documentation.

FEMA will continue to evaluate ways to reduce respondent burden and improve the usefulness of the information collected, including through electronic submission, structured data capture, improved template design, reusable data fields, and tools that support traceability from objectives to capabilities, observations, recommended actions, and improvement plans. FEMA's Preparedness Toolkit and Exercise Builder already provide capabilities to support exercise planning, conduct, evaluation, and documentation, and FEMA will consider whether additional functionality or guidance could further reduce duplicative entry and formatting burden.

With respect to the burden estimate, FEMA will review the commenter's concerns regarding administrative time associated with formatting, document reconciliation, and template manipulation. FEMA is currently reviewing the HSEEP doctrine with respect to burden. However, the comment does not provide sufficient quantitative data across the respondent universe to support revising the current burden estimate at this time. No change to the information collection or burden estimate is proposed based solely on this comment. FEMA will consider the feedback in future revisions to HSEEP documentation, templates, digital tools, and associated burden analyses.

A 30-day Federal Register Notice inviting public comments was published on [Month DD, YYYY](#), at [XX FR XXXXX](#). The public comment period is open until [Month DD, YYYY](#).

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultations with other Federal agencies, via the Exercise Implementation Committee, occur annually regarding the development, testing, and evaluation of the Goal and other plans and strategies. Several working groups have been held with exercise and emergency management stakeholders across the nation in order to provide recommendations for evaluation and planning submission requirements.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Comments from representatives from whom the information is collected from are welcomed. A formal process for this to occur is the inclusion of the “Participant Feedback Summary” section with the report that allows the respondents to offer suggestions, critiques of exercise actions, and other feedback. FEMA uses this information to improve future exercises.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.

A Privacy Threshold Analysis (PTA) was completed by FEMA and adjudicated by the DHS Privacy Office on March 1, 2024, and expires March 30, 2027.

The Homeland Security Exercise and Evaluation Program (HSEEP) is a privacy sensitive collection requiring Privacy Impact Assessment (PIA) coverage. These forms are covered by an existing PIA, DHS/FEMA 013 – Grant Management Programs, approved by DHS on July 14, 2009; PIA, DHS/FEMA 016 – Application and Registration Records for Training and Exercise Programs, approved by DHS on March 3, 2011.

There are no assurances of confidentiality provided to the respondents for this information collection.

11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection

instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

Respondents will include State, local, Tribal, and territorial governments that are recipients of grants or would like to nominate an exercise into the National Exercise Program. It is estimated that 56 state and territorial governments, 28 local (Urban Area Security Initiative) governments, and 25 Tribal governments will each submit 3 After Action Report/Improvement Plans and 1 Integrated Preparedness Plan. Each After Action Report/Improvement Plan is estimated to take 40 hours to complete and each Integrated Preparedness Plan is estimated to take 12 hours to complete. It is further estimated that approximately 35 state, local, Tribal, and territorial governments will choose to submit a National Exercise Program Support Request Form per year, which will take approximately 2 hours to complete. The total burden for all three forms will therefore be 14,458 hours.

FEMA Form FF-008-FY-21-102 (formerly 091-0-1), After Action Report/Improvement Plan (AAR/IP) – is estimated to have 109 respondents times three (3) responses per year for 327 total annual response ($109 \times 3 = 327$). It is estimated that each response will require 40 burden hours to complete, therefore 327 responses times 40 hours equals 13,080 total annual burden hours ($327 \times 40 = 13,080$).

FEMA Form FF-008-FY-21-100 (formerly 008-0-26), Integrated Preparedness Plans (IPPs) – is estimated to have 109 respondents times one (1) responses per year for 109 total annual response ($109 \times 1 = 109$). It is estimated that each response will require 12 burden hours to complete, therefore 109 responses times 12 hours equals 1,308 total annual burden hours ($109 \times 12 = 1,308$).

FEMA Form FF-008-FY-21-101 (formerly 008-0-27), National Exercise Program (NEP) Support Request Form – is estimated to have 35 respondents times one (1) responses per year for 35 total annual response ($35 \times 1 = 35$). It is estimated that each response will require 2 burden hours to complete, therefore 35 responses times 2 hours equals 70 total annual burden hours ($35 \times 2 = 70$).

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

Please see our response for 12a above and 12c below.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.45 (1.62 for State and local government employees) ¹ and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form No.	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local, or Tribal, Government	After Action Report/Improvement Plans / FEMA Form FF-008-FY-21-102 (formerly 091-0-1)	109	3	327	40	13,080	\$88.63	\$1,159,280
State, Local, or Tribal, Government	Integrated Preparedness Plans / FEMA Form FF-008-FY-21-100 (formerly 008-0-26)	109	1	109	12	1,308	\$88.63	\$115,928
State, Local, or Tribal, Government	National Exercise Program (NEP) Nomination Form / FEMA Form FF-008-FY-21-101 (formerly 008-0-27)	35	1	35	2	70	\$88.63	\$6,204
Total		253		471		14,458		\$1,281,412

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2025 report Occupational Employment and Wage Estimates wage rate for Management Analysts (SOC code 13-1111) is \$54.71.² Including the wage rate multiplier of 1.62, the

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03202026.pdf. Accessed May 15, 2026. The national wage multiplier is calculated by dividing total compensation for all workers of \$48.78 by wages and salaries for all workers of \$33.45 per hour yielding a benefits multiplier of approximately 1.45. For State and local government employees the wage multiplier is calculated by dividing total compensation for State and local government workers of \$65.68 by Wages and salaries for State and local government workers of \$40.49 per hour yielding a benefits multiplier of approximately 1.62.

² Information on the May 2025 National mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at <https://www.bls.gov/oes/tables.htm>. Accessed May 13, 2026

fully loaded wage rate is \$88.63 per hour. Therefore, the burden hour cost is estimated to be \$1,281,412 annually (\$88.63 x 14,458 hours).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

Annual Cost Burden to Respondents or Recordkeepers				
Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment, and other one-time expenditures)	*Annual Operations and Maintenance Costs (such as recordkeeping, technical/professional services, etc.)	Annual Non-Labor Cost (expenditures on training, travel, and other resources)	Total Annual Cost to Respondents
N/A				
Total	\$0	\$0	\$0	\$0

The cost estimates should be split into two components:

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

There are no operation or maintenance costs associated with this information collection.

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There are no capital or start-up costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs:	\$0
Staff Salaries: 2 of GS 13, step 5 employees ¹ spending approximately 20% of time annually reviewing data, making determinations of outcomes performing follow-up as necessary, and assuring quality control of the process for this data collection $2 \times \$138,024 \times 1.45 \text{ loaded wage rate}^2 \times 20 \text{ percent} = \$80,054$	\$80,054
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel (not to exceed)	\$0
Total	\$80,054
¹ Office of Personnel Management 2026 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DCB.pdf . Accessed January 09, 2026. ² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

*A “**Program increase**” is an additional burden resulting from an Federal Government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.*

*A “**Program decrease**”, is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal Agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).*

*An “**Adjustment**” denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.*

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
After Action Report/Improvement Plans / FEMA Form FF-008-FY-21-102 (formerly 091-0-1) (States, Local, Tribal, Territorial Governments)				13,080	13,080	0
Integrated Preparedness Plans / FEMA Form FF-008-FY-21-100 (formerly 008-0-26)				1,308	1,308	0
National Exercise Program (NEP) Nomination Form / FEMA Form FF-008-FY-21-101 (formerly 008-0-27)				70	70	0
Total(s)				14,458	14,458	0

Explain: There is no change.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (cost currently on OMB inventory)	Program Change (new)	Difference	Adjustment (cost currently on OMB inventory)	Adjustment (new)	Difference
After Action Report/Improvement Plans / FEMA Form FF-008-FY-21-102 (formerly 091-0-1) (States, Local, Tribal, Territorial Governments)				\$719,138	\$1,159,280	\$440,142
Integrated Preparedness Plans / FEMA Form FF-008-FY-21-100 (formerly 008-0-26)				\$71,914	\$115,928	\$44,014
National Exercise Program (NEP) Nomination Form / FEMA Form FF-008-FY-21-101 (formerly 008-0-27)				\$3,849	\$6,204	\$2,355
Total(s)				\$794,901	\$1,281,412	\$486,511

Explain: There is an increase of \$486,511 due to the general increase in wages.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

FEMA does not intend to employ the use of statistics or the publication thereof for this information collection.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

FEMA will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

FEMA does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.