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Comment Submitted by 4C North America

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Comment

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.

Respectfully submitted,

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