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Comment

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)?

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