

## **Comment of International Deaf Emergency on OMB Control No. 1660-0131 (THIRA/SPR Unified Reporting Tool)**

### **Comment of International Deaf Emergency**

**OMB Control No. 1660-0131 | ICR Reference No. 202605-1660-007 | Docket ID FEMA-2025-0278**

Threat and Hazard Identification and Risk Assessment (THIRA)/Stakeholder Preparedness Review (SPR) Unified Reporting Tool

30-day notice, 91 FR 54355 (August 21, 2026). Submitted via [www.reginfo.gov/public/do/PRAMain](http://www.reginfo.gov/public/do/PRAMain).

International Deaf Emergency (IDE) is a Deaf-led 501(c)(3) nonprofit that has worked in disaster risk reduction for sixteen years. Its president, who signs this comment, is Deaf. IDE builds Deaflare, an emergency-alert application for Deaf, hard-of-hearing, and DeafBlind users that redistributes FEMA IPAWS alerts. Deaflare is in its testing phase and will be free to use. IDE works with FEMA's IPAWS program under a Memorandum of Agreement signed August 25, 2026, and holds an assigned Collaborative Operating Group in the IPAWS test environment. IDE also authors the Three Senses Alerting Standard, an open specification for equivalent alert meaning across visual, haptic, and audio channels. This comment responds to the invitation to "enhance the quality, utility, and clarity of the information to be collected."

The gap. Through the THIRA/SPR, the States, territories, urban areas, and Tribes "receiving non-disaster preparedness grant funds administered by DHS" first identify their capability targets and then assess their current capability against those targets (91 FR 54355). FEMA's Supporting Statement A for this collection describes the assessment as structured by "the 32 core capabilities from the 2015 National Preparedness Goal," with States, territories, and urban areas reporting on each core capability and Tribes reporting on eight of them. Public Information and Warning is one of those core capabilities; FEMA's 2015 National Preparedness Report, a supplementary document in this ICR package, lists it among the capabilities common to all five mission areas. As collected today, a jurisdiction can report its Public Information and Warning capability against its own target without any evidence that its alert and warning pathways reach residents who cannot hear.

Nothing in the material FEMA has posted for this collection, Supporting Statement A dated August 25, 2026 and its supplementary documents, describes an element that would distinguish a jurisdiction whose alerting includes accessible channels from one whose alerting is siren and broadcast only. If such an element already exists in the tool, IDE asks FEMA to say so, and asks that it require evidence rather than assertion.

The population affected is not marginal, and it is precisely the population for whom the informal channels that backstop official alerting, sirens winding down, radio, and word of mouth, fail completely.

The fix: one element, near-zero burden. Within the Public Information and Warning capability assessment, add one structured element to the data a jurisdiction already reports: does the jurisdiction's alert and warning capability include at least one pathway that conveys the alert without relying on hearing, for example Wireless Emergency Alerts, an accessible mass-notification service, or an equivalent, and has that pathway been exercised? The first half belongs with equipment and the second with exercises, two of the five POETE areas the SPR already uses. It is a single yes or no with a short evidence field, answered once a year. It converts an unmeasured gap into a reported one, gives FEMA a national picture it currently lacks, and gives jurisdictions a reason to close the gap before a disaster measures it for them.

Why this is proportionate. FEMA estimates this collection at 88,779 annual burden hours across 256 respondents, roughly 347 hours per response (91 FR 54356). One yes or no with a short evidence field is minutes against that baseline. The return is a number the Federal Government does not have today: the share of grant-funded jurisdictions whose warning capability reaches residents who cannot hear. Supporting Statement A states that the information collected here is summarized in the National Preparedness Report, so that report is where such a number would land and be used. IDE notes that the Oregon Department of Emergency Management, in the 60-day round, recommended aligning the assessment with "the Planning, Organizing, Equipping, Training, and Exercise (POETE) framework and real-world performance data (incidents, exercises)". The exercise half of the element IDE proposes is exactly that.

This answers a concern FEMA itself records. FEMA reports that it received 14 comments in the 60-day round, and that respondents "stated that the THIRA/SPR process imposes a significant burden while providing limited practical value," with additional issues including "unclear use of the data" (91 FR 54355 to 54356). An element that produces a national number FEMA does not have today answers that concern rather than adding to it.

What IDE asks. IDE does not ask OMB to withhold clearance. The submission now before OIRA (ICR Reference No. 202605-1660-007) proposes no change to the instrument, so IDE asks for this element at the next point at which the instrument is opened, by either of two routes already available:

1. That OIRA, in approving this collection, note in its terms of clearance that FEMA should evaluate a disaggregated alert-accessibility element for the Public Information and Warning core capability, and report on that evaluation at the next submission.
2. That FEMA include the element when it implements the streamlined, Likert-scale methodology that commenters in the 60-day round describe FEMA as having proposed in 2024 and ask FEMA to implement. Folding one element into a redesign already under consideration adds no net burden to respondents.

IDE offers, at no cost to FEMA, to supply draft wording for the element and to test it against the draft Three Senses Alerting Standard, and IDE would welcome participation in any FEMA-led working group on THIRA/SPR methodology.

Respectfully submitted,

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