SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Alaska Native Handicrafts, 50 CFR Part 92.6
OMB Control Number 1018-0168

Terms of Clearance: None.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Federal regulations currently state that people may not sell, offer for sale, purchase, or offer to purchase migratory birds, their parts, or their egg(s) taken under the Alaska migratory bird subsistence harvest regulations (50 CFR part 92.6). Regulations implemented in 2017 (82 FR 34263) enable Alaska indigenous people eligible for the spring-summer subsistence harvest of migratory birds in Alaska to sell in a limited manner authentic native handicrafts or clothing containing inedible parts from migratory birds taken for food during the subsistence harvest season. A committee of the Alaska Migratory Bird Co-Management Council (AMBCC) collaboratively developed the regulations. The AMBCC includes the U.S. Fish and Wildlife Service (Service, we), the Alaska Department of Fish and Game, and AMBCC native representatives from the Yukon-Kuskokwim Delta, Bering Strait-Norton Sound, North Slope, Kodiak Archipelago, Bristol Bay, Gulf of Alaska-Cook Inlet, Aleutian-Pribilof Islands, and Northwest Arctic regions.

A provision in 50 CFR part 92.6 allows the sale of handicrafts containing inedible parts of birds taken for food during the Alaska spring-summer migratory bird subsistence harvest. To limit sales of handicrafts including parts of migratory birds, the regulations define *(a) "authorized migratory birds;"* (b) *"authentic native article of handicraft or clothing;"* and (c) "*sales by consignmen*t."

To develop a list of migratory bird species authorized for use in handicrafts for sale, the committee analyzed the related international treaties. The species list of the Japan Treaty is the most restrictive one, and consistent with this treaty, the committee compiled a list in which handicrafts for sale may contain inedible parts of 27 migratory bird species.

Under Article II(4)(b) of the Protocol between the United States and Canada amending the 1916 Convention for the Protection of Migratory Birds in Canada and the United States, only Alaska native people are eligible to sell handicrafts containing inedible parts of birds taken for food in the Alaska spring-summer migratory bird subsistence harvest. The Protocol also dictates that sales would be under a limited context. Eligibility for sale of such handicrafts would be proven by a:

(a) Tribal Enrollment Card;
(b) Bureau of Indian Affairs card; or
(c) Membership in the Silver Hand program.

To limit counterfeiting of handicrafts including bird parts, a certification (FWS Form 3-2484, Certificate for Sale of Alaska Native Handcrafts Including Migratory Bird Parts) signed by the artist or a Silver Hand tag must accompany each sold item. Regulations restrict all sales and transportation of sold items to be within the United States. FWS Form 3-2484 is a simple certification and is not subject to the Paperwork Reduction Act. We provided OIRA with a copy of the form as a supplementary document in ROCIS.

The State of Alaska Council on the Arts administers the Silver Hand program. This program was implemented to help Alaska Native artists promote their work in the marketplace and to assist potential buyers in identifying authentic Alaska Native art. To be eligible for a Silver Hand permit, an Alaska Native artist must be a full-time Alaska resident, be at least 18 years old, and provide documentation of membership in a federally recognized Alaska Native tribe. Registrations are valid for a 3-year period, after which, participants need to renew their permit. Attaching Silver Hand tags to original articles of authentic Alaska Native art requires the items be hand-made, entirely by the artist, and within the state of Alaska. Reproductions and manufactured work are ineligible for Silver Hand tags.

Buyers must retain the certification signed by the artist or the Silver Hand tag for each handicraft item and produce it upon request of a law enforcement officer. This documentation will be used by the law enforcement officer to authenticate that the artist was Alaska Native and that the sale met all the legal requirements of the regulations set forth in 50 CFR Part 92.6. Law enforcement officers may record this information in confidential law enforcement files.

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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The requirement to retain the certification or the Silver Hand tag is a recordkeeping requirement. We define a recordkeeping requirement as a requirement imposed by or for an agency on persons to maintain specified records, including a requirement to retain such records.

The duty to disclose the records upon request to an agency or other party also is an information collection requirement [5 CFR 1320.3(m)(3)].

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 and specifically how this collection meets GPEA requirements.

This is a recordkeeping requirement only.

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.

There is no duplication. Artists provide the certification form or Silver Hand tag for each art piece sold. Sellers/consignees must provide the documentation to buyers. Buyers must retain the documentation for the art piece purchased.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This collection does not significantly impact small businesses. We developed FWS Form 3-2484 for those artists that do not participate in the Silver Hand program. FWS Form 3-2484 is a simple certification form that artists can supply with their art piece and is not subject to OMB

approval under the Paperwork Reduction Act. Participants in the Silver Hand program have Silver Hand tags to attach to their art pieces.

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

Reducing or eliminating the requirement to retain the certificate or the Silver Hand tag would greatly limit the ability of law enforcement to ensure that handicrafts including parts of authorized migratory birds offered for sale comply with regulatory requirements.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **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;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **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; or**
- **requiring respondents to submit proprietary trade secrets, 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.**

We require buyers of Alaska handicrafts to retain the artist certification or silver hand documentation permanently. This is necessary so that law enforcement officers can ensure that handicrafts, including parts of authorized migratory birds, offered for sale comply with regulatory requirements. There are no other circumstances requiring the collection of information in a manner inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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.

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

On May 18, 2026, we published in the *Federal Register* (91 FR 28617) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on July 17, 2026. We also published the *Federal Register* notice on Regulations.gov (Docket No. FWS-R7-MB-2026-1884). We received the following comment in response to that notice:

> ***Comment 1:*** Anonymous electronic comment submitted via Regulations.gov [FWS-R7-MB-2026-1884-0003] on July 17, 2026. The commenter requested the Service protect all migratory birds and animals.
>
> > ***Agency Response to Comment 1:*** The commenter did not address the information collection requirements; therefore, no response is required.

In addition to the *Federal Register* notice above, we attempted to consult with nine individuals who are familiar with this collection of information in order to validate our time burden estimates. Form 3-2484, Certificate for Sale of Alaska Native Handcrafts Including Migratory Bird Parts, if used, is filled out by the artist and provided with the piece of art but there is no requirement to provide it to the Service. We estimate the time to complete this certification to be approximately 5 minutes resulting in negligible burden. Despite our burden estimate of 1 respondent developed in coordination with the Alaska State Council for the Arts, the program has, to the best of our ability, no known participants currently utilizing Form 3-2484 which would require recordkeeping or 3rd party notifications. Consequently, without any known participants, we are unable to conduct the targeted outreach. However, since the information collections are regulatory requirements, we are required to renew the collection.

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

We will not provide any gifts or payments to respondents.

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

We do not provide any assurance of confidentiality.

11. Provide additional justification for any questions 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.

We do not ask questions of a sensitive nature.

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

* **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 desirable. 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.**
* **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
* **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

We estimate that we will receive **2 responses** totaling **0 burden hours**. We estimate the annual dollar value of the burden hours is **$0** (rounded).

To estimate burden associated with this information collection, the number of responses and completion time per response were based on the following information provided by the Alaska State Council on the Arts (https://arts.alaska.gov/silver-hand-program/) in May 2023:

The Silver Hand Program estimates there are up to 2,245 active permit holders. Registrations are valid for a 3-year period, after which participants need to renew their permit. Silver Hand tags can only be attached to an original article of authentic Alaska Native art that has been made entirely by the artist and within the State of Alaska. Silver Hand participants use up to an estimated 150-200 tags per year. Participants may request additional tags if needed. The Silver Hand Program does not track the number of pieces of art that contain permissible migratory bird parts. The program involves applying to the State of Alaska for one permit (estimate time to apply is 1 hour) to receive 100 free Silver Hand Tags. The Silver Hand Tags are applied to all permissible handicrafts, of which a small percentage are estimated to contain migratory bird parts per observations by the Alaska Council for the Arts. We estimate the time burden to be less than 5 minutes to apply the tag, and therefore the value of Annual Burden Hours to be negligible ($0).

The Bureau of Labor Statistics (BLS) "May 2025 State Occupational Employment and Wage Estimates" lists the mean hourly wage for persons in "farming, fishing, and forestry occupations (45-0000)" in Alaska as $25.67. In accordance with BLS News Release USDL-26-0827, June 12, 2026, Employer Costs for Employee Compensation—March 2026, we used the following multipliers to calculate the cost of the total annual burden hours:

- Individuals – multiplier of 1.46 for an hourly rate of $37.48, including benefits.
- Private Sector – multiplier of 1.43 for an hourly rate of $36.71, including benefits.

Requirement	Estimated Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours	Hourly Wage (w/Benefits)	$ Value of Annual Burden Hours
Recordkeeping (Documentation - Alaska Handicrafts)					
Individuals or Households	1	5 minutes	0	$ 37.48	$0
Third-Party Disclosure (Artists/Sellers/Consignees Provide Documentation to Buyers)					
Private Sector	1	5 minutes	0	$ 36.71	$0

Totals	**2**		**0**		**$0**

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- *** The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). 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. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- *** If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- *** Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

We have not identified any nonhour cost burden.

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 not have been incurred without this collection of information.

We estimate the cost to the Federal Government for law enforcement personnel to review documentation and determine authenticity of the handicraft is **$106** (rounded).

We used the Office of Personnel Management's Salary Table 2026-AK to determine the average hourly rate and in accordance with BLS News Release USDL-26-0827, we multiplied the hourly wages by 1.62 to account for benefits, resulting in a rate of $97.07 (incl. benefits).

Position and Grade	Hourly Rate	Hourly Rate (incl. benefits)	Total Annual Hours*	Annual Cost
Federal Law Enforcement Officer (GS 13/5)	$ 65.36	$ 105.88	1	$ 105.88

*Currently, we have no known participation in this program so the hourly requirement for law enforcement personnel will be minimal.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

We are not reporting any program changes or adjustments. The requirements in this information collection are associated with regulations and cannot be discontinued without a regulatory action.

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.

We will not publish the results of the information collection.

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

This approval is for a recordkeeping requirement and a third party disclosure. We will include the OMB control number and expiration date on all appropriate supporting documents (correspondence, etc.).

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.