



# Audit Report



OIG-17-038

REVENUE COLLECTION AND INDUSTRY REGULATION

TTB Appropriately Designates American Viticultural Areas, But Improvements Would Strengthen the Program

April 3, 2017

Office of  
Inspector General

Department of the Treasury

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## Abbreviations

APA	Administrative Procedure Act
AVA	American Viticultural Area
CFR	Code of Federal Regulations
GAO	Government Accountability Office
JAMES	Joint Audit Management Enterprise System
NPRM	Notice of Proposed Rulemaking
OIG	Office of Inspector General
RRD	Regulations and Rulings Division
TTB	Alcohol and Tobacco Tax and Trade Bureau
Treasury	Department of the Treasury
USGS	United States Geological Survey

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*The Department of the Treasury  
Office of Inspector General*

April 4, 2017

John J. Manfreda,  
Administrator  
Alcohol and Tobacco Tax and Trade Bureau

This report presents the results of our audit of the Department of the Treasury's (Treasury) Alcohol and Tobacco Tax and Trade Bureau's (TTB) American Viticultural Area (AVA) program. TTB has the authority over and is responsible for the designation or modification of AVAs. An AVA is a designated area for growing wine grapes in the United States and is defined by TTB at the request of petitioners.

Our audit objectives were to assess the controls in place over TTB's program to designate AVAs and determine whether decisions to designate AVAs were made consistently and in accordance with established regulations and guidance. To accomplish our objectives, we interviewed officials from TTB's Regulations and Rulings Division (RRD) that oversee the AVA program as well as representatives from the wine industry who have participated in the AVA designation process. We also reviewed applicable AVA program documentation provided to us by TTB. We conducted fieldwork from February 2016 through June 2016. Appendix 1 contains a more detailed description of the audit objectives, scope, and methodology.

## Results in Brief

Based on our review of TTB's AVA program we concluded that TTB is consistent in its AVA program designation process. TTB designated AVAs consistently in accordance with law, Federal regulations, and TTB guidance. Industry members we interviewed told us that existing regulations were sufficiently clear and

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transparent and that TTB had improved the integrity of the AVA program with the amendment of AVA regulations in February 2011.

We found that TTB had not established formal written standard operating procedures documenting how the functions necessary for processing AVA petitions are performed. Additionally, we found that TTB could improve the review and transparency of the AVA designation process and program by providing the public a United States Geological Survey (USGS) map of the proposed as well as the approved boundary of an AVA as a digital document.

Accordingly, we are recommending that TTB (1) develop written standard operating procedures for the AVA program that properly document the fundamental steps taken during the AVA designation process and (2) examine the capability to provide USGS maps as digital documents to enhance and improve transparency of the AVA program both during and after the rulemaking process, including consideration of the cost and benefits for doing this.

In its management response, TTB concurred with our recommendations and has begun and plans to implement corrective actions as recommended in this report. TTB management's response, in its entirety, is included as appendix 2. TTB will need to record the estimated date for completing its planned corrective actions in the Joint Audit Management Enterprise System (JAMES), Treasury's audit recommendation tracking system.

## **Background**

### **TTB's Authority and Responsibilities**

TTB is the Federal agency responsible for carrying out provisions of the Federal Alcohol Administration Act that protect consumers from deceptive practices and ensures that labeling and advertising

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of alcohol beverages provide adequate information on the identity and quality of the product.<sup>1</sup>

For wine, appellations of origin are used in both the product's labeling and advertising to convey the geographic origin of the dominant grapes used to produce the wine. An AVA is one kind of appellation of origin.<sup>2</sup> TTB's authority in this regard extends to its oversight in the establishment and modification of AVAs as well as the regulation on the use of AVA names as appellations of origin on wine labels and in wine advertising.

RRD oversees the AVA designation program.<sup>3</sup> A written request, referred to as a petition, must be submitted to RRD in accordance with TTB regulations in order to establish a new AVA or modify an existing AVA.<sup>4</sup> Any individual or entity may file an AVA petition and there is no fee for filing a petition.

In 2011, TTB amended its regulations governing the establishment of AVAs. The amended regulations were aimed at addressing issues experienced by TTB that included incomplete or insufficient evidence in AVA petition submittals, conflicts between proposed AVA names with existing brand names and the need for clearer regulatory standards when establishing AVAs that were within or overlapped existing AVAs. Additionally, the amended regulations were to provide and clarify the rules for preparing, submitting, and processing AVA petitions.

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<sup>1</sup> Public Law 74-401, 49 Stat. 977 (Aug. 29, 1935).

<sup>2</sup> Under Title 27 of the Code of Federal Regulations (CFR) §4.25, TTB defines and sets forth the eligibility requirements for the use of an appellation of origin for American wine labels. These include 1) the United States, 2) one or no more than three contiguous states, 3) one or no more than three counties in the same state, or 4) an AVA.

<sup>3</sup> TTB's RRD is responsible for the development of regulations, rulings, policies, and procedures to implement TTB's statutory responsibilities.

<sup>4</sup> 27 CFR §9, "*American Viticultural Areas*".

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## American Viticultural Areas

An AVA is a specific grape growing area in the United States that has distinguishing features such as soil and climate that make it distinctive from surrounding areas and allow vintners and consumers to attribute a given quality, reputation, or other characteristic to the wine.<sup>5</sup>

The first AVA was designated in 1980<sup>6</sup> by the Bureau of Alcohol, Tobacco and Firearms, TTB's predecessor agency.<sup>7</sup> As of August 2016, 237 AVAs have been established in the United States. The designation of an AVA is neither an approval nor an endorsement by TTB of a wine that carries the AVA name.

## Audit Results

### **TTB's AVA Program Provided Consistency in the AVA Designation Process Although Written Procedures and Transparency Could Be Improved**

Our audit of TTB's AVA program found that TTB designated AVAs consistently in accordance with law, regulations, and guidance. Industry members were satisfied overall with TTB's administration of the AVA designation process, and those we interviewed told us that the regulations and process were sufficiently clear and transparent. Although the amended regulations have improved the AVA designation process by clarifying both the process and evidence required when petitioning for a new AVA or modifying an

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<sup>5</sup> AVA labeled wines must be made from at least 85 percent of the grapes grown within the boundaries of the viticultural area. Wines labeled with an appellation of origin of a country, state, county or foreign equivalent must be made from at least 75 percent of the grapes grown from those areas.

<sup>6</sup> The Augusta viticultural area located in the State of Missouri was established on June 20, 1980.

<sup>7</sup> The Homeland Security Act of 2002 (Nov. 25, 2002) divided the Bureau of Alcohol, Tobacco and Firearms into two separate agencies; the Bureau of Alcohol, Tobacco, Firearms and Explosives under the Department of Justice and TTB under Treasury.

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established AVA, TTB lacks written standard operating procedures documenting steps taken during the AVA petition and approval process.

TTB provides the AVA petition and related supporting material online for the public to view during the rulemaking process. However, the USGS maps that are required to be submitted with a petition are not available online and a request must be made to TTB to view them. The availability to view the USGS maps as a digital document would aid TTB's review of the map and increase transparency of the AVA program.

#### TTB's AVA Program Consistently Complied With Regulations

We concluded that TTB followed the process outlined in its regulations during the processing of AVA petitions. The AVA designation process begins with the submittal of a written AVA petition to RRD. Regulations mandate that TTB send a written acknowledgement of the petition receipt to the petitioner within 30 days. We found that all AVA petitions submitted to TTB during the audit period received an acknowledgement letter within the allotted time.

An initial review of the petition is performed to determine whether the petition is perfected. A petition is considered perfected when it meets TTB's basic regulatory requirements for AVA petitions and contains sufficient supporting information for TTB to decide whether or not to proceed with rulemaking for the proposed AVA.<sup>8</sup> The petitioner will be notified in writing if the petition is accepted as perfected or rejected.

We reviewed all 18 petitions received by TTB from January 1, 2012 through March 1, 2016 in which an AVA was designated or

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<sup>8</sup> 27 CFR §9.12, "AVA Petition Requirements". The essential elements to be included in the petition are distinguishing features of the proposed AVA area; boundary evidence with a written boundary description including a map(s) and; proposed name evidence regarding how the proposed name is currently and directly associated with the proposed AVA area.

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a Notice of Proposed Rulemaking (NPRM) published in the Federal Register and found for each of these that the petitioner was notified in writing when the petition was perfected and would proceed to rulemaking.<sup>9</sup> In addition, when the petition was accepted as perfected, a notice to that effect was posted on the TTB's website. We found all perfected petitions in which an AVA was designated or modified contained the required essential elements as required by the regulations. Those petitions that were deemed not to meet the criteria established under TTB regulations were returned to the petitioners with a letter detailing the deficiencies found in the petition.

In accordance with the Administrative Procedure Act (APA), we found TTB used an open public process when determining to rule on an AVA designation or modification.<sup>10</sup> Additionally, we found after TTB determined that an AVA petition contained sufficient information on essential elements and met regulatory requirements, TTB prepared and published a NPRM in the Federal Register soliciting public comment.<sup>11</sup> We also found that TTB published its final rule in the Federal Register after considering public comments received and other relevant information provided during the NPRM open period. The process to designate or modify an AVA typically took several years or longer to complete.

Figure 1 below depicts a flowchart of TTB's process for AVA designation.

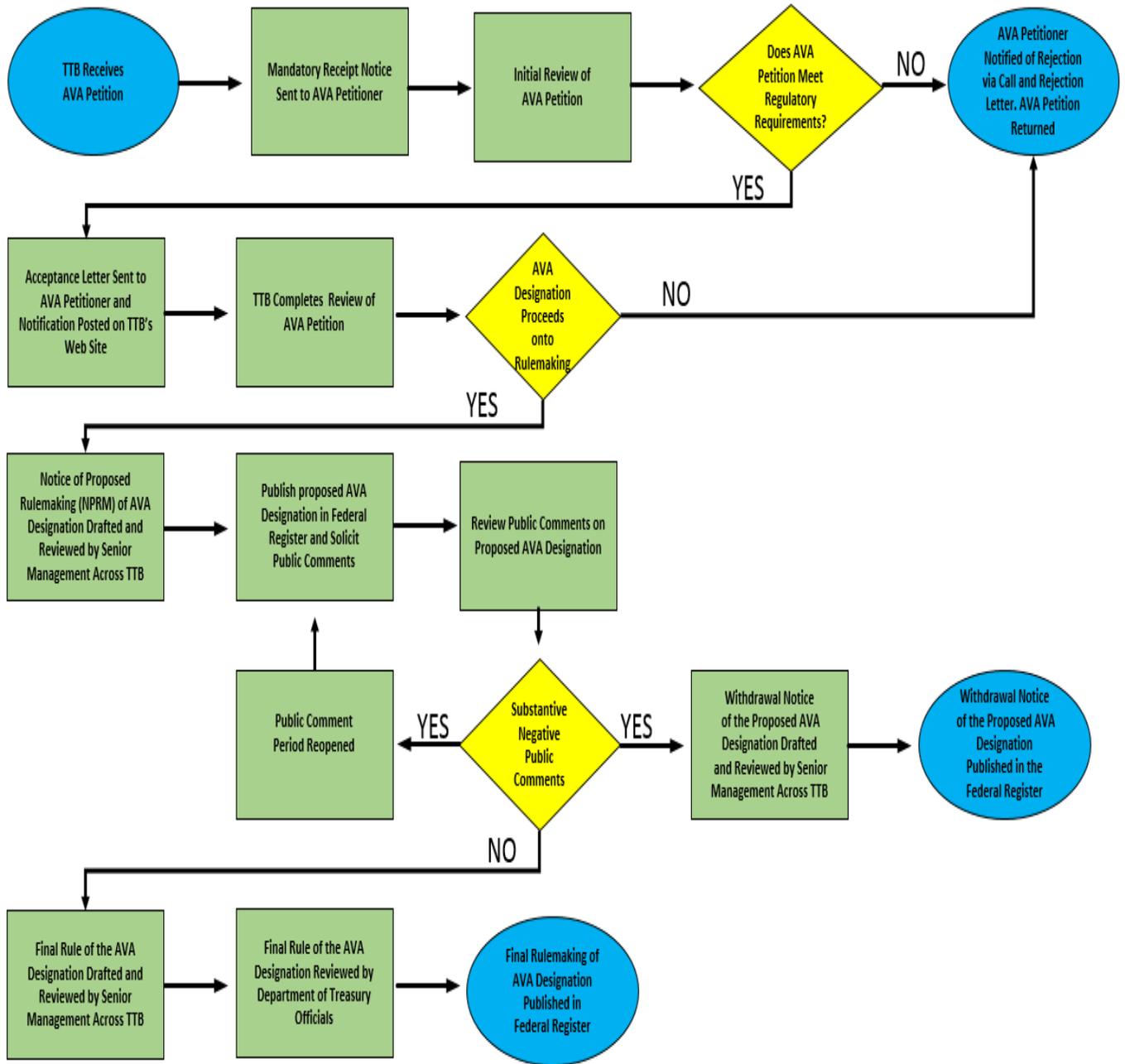
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<sup>9</sup> During our audit period, 11 AVA petitions went through rulemaking to become designated or modified AVAs and 7 were still in the rulemaking process.

<sup>10</sup> The APA is codified at 5 U.S.C. §551-559. The APA describes a rulemaking process to which agencies are required to comply. Typically, Federal agencies are required to publish notices of proposed rulemaking in the Federal Register to enable citizens to participate in the decision making process of the Government.

<sup>11</sup> The Federal Register is a daily publication of the Federal Government that among other things provides proposed and final rules and notices of Federal agencies and organizations.

**Figure 1: Flowchart of AVA Designation Process**



Source: Office of Inspector General (OIG) analysis of TTB regulations and AVA program documentation.

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### Amended Regulations Improved AVA Designation Process

Industry members we spoke to involved in the AVA petition process prior to the amendment of the AVA regulations told us the changes to the regulations had improved the process by increasing the clarity and integrity of the program. All industry members we spoke with found the regulations to be clear and the AVA program sufficiently transparent. These industry members stated that TTB processed AVA petitions in a consistent manner in accordance with regulations.

According to TTB, the revisions required AVA petitions to contain greater specificity in the information provided such as the distinguishing features of the proposed AVA. We were told by both industry members and TTB officials that the current AVA petition requirements have improved the quality of evidence provided in AVA petitions. TTB officials stated this has improved the timeliness of their AVA designation process. Our review of TTB's processing times confirmed that the time to designate an AVA has improved. On average, time decreased 26 percent from 33 months to 24 months.<sup>12</sup>

### Public Comment on AVA Rulemaking Was Deemed an Appropriate Process

AVA regulations state that a petition must contain sufficient information, data, and evidence such that no independent verification or research is required by TTB. According to TTB officials, TTB does not have the time or resources to substantiate the petition information.<sup>13</sup> Instead TTB relies on public comments

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<sup>12</sup> Analysis based on TTB's average time for processing AVA petitions which became designated AVAs. Time measured was 3 years before revisions, 2008 through 2010, compared with processing times 3 years after revisions, which was 2011 through 2013. This measured the time once an AVA petition became perfected until the AVA petition went through rulemaking and was designated.

<sup>13</sup> Evidence cited in a petition can include distinction in geology, physical features, soil and climate.

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received during the NPRM process to validate the evidence in an AVA petition.

Industry members we spoke with said that TTB's reliance on public comments to validate the accuracy of the petition information was an acceptable process. Industry members stated that TTB considers and adequately responds to public comments as part of the rulemaking process. One industry member suggested TTB should consider use of a third party to validate AVA petition information or validate it themselves to improve the process. However, concern was also expressed whether TTB had the resources to administer this without negatively affecting the length of time to process a petition.

#### TTB Had Incomplete Standard Operating Procedures

TTB does not have formal written standard operating procedures documenting how the functions necessary for processing AVA petitions are performed. A TTB official told us that TTB considers the general standards and rules set forth under AVA regulations to be its policies and procedures. All Treasury bureaus and offices are required to establish adequate and proper documentation of their functions, policy decisions, procedures, and essential transactions in a manner that promotes accountability and establishes a historical record.<sup>14</sup>

The lack of written standard operating procedures does not meet required government-wide internal control standards. TTB needs to ensure that its staff has standard operating procedures to ensure AVA petitions are consistently processed and to train new staff in the event of turnover in the bureau. The Government Accountability Office's (GAO) *Standards for Internal Controls in the Federal Government* call for managers to clearly document internal controls and all transactions and other significant events in a manner that allows for ready examination. The documentation may appear in management directives, administrative policies, or

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<sup>14</sup> Treasury Directive 80-05, Records and Information Management Program (June 26, 2002).

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operating manuals and may be in paper or electronic form. Documentation and records should be properly managed and maintained.<sup>15</sup>

While we found that all AVA petitions we reviewed had gone through rulemaking or were currently in the rulemaking process conformed to regulations, we also found that TTB regularly provided additional oversight activity during the AVA petition process beyond what is specified in the regulations and the *AVA Manual for Petitioners*.<sup>16</sup> For example, TTB's regulations and manual require that a rejected petition, that is a petition failing to meet basic TTB requirements, be simply returned to the petitioner. We found that in addition to returning the petition, TTB also provides a detailed explanation, both in writing as well as verbally to the petitioner, explaining the reasoning for its decision. This communication provides the petitioner with a better understanding of what was lacking in the petition. Many times the petitioner will amend and resubmit the petition. In most cases the resubmitted petition will then be accepted as perfected by TTB. Another important activity performed, but not documented as a procedure is the name check performed on the proposed AVA name after a petition has been accepted. A request is sent to TTB's Advertising, Labeling, and Formulations Division to determine whether there are any approved labels with a brand name that may be impacted by the approval of the AVA name.

#### Potential to Improve Transparency and Review Process for the AVA Program Exists

TTB provides public access to relevant rulemaking materials including the submitted petition, supporting analyses such as soil

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<sup>15</sup> GAO, *Standards for Internal Control in the Federal Government* (GAO/AIMD-00-21.3.1; issued Nov. 1999). GAO's September 2014 revision, GAO-14-704G, which became effective beginning with fiscal year 2016, also includes these requirements.

<sup>16</sup> TTB Publication P 5120.4, *AVA Manual for Petitioners* (Sep. 2012). This publication provides guidance for persons who wish to petition TTB for the initiation of rulemaking to establish a new AVA or to modify an existing AVA.

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studies, the NPRM, public comments, the final rule and other relevant documents.<sup>17</sup> An essential element that is required to be included in an AVA petition is a USGS map. The map must be large enough to show adequate geographical detail for the proposed boundary line. We found during our review of AVA petitions that multiple maps were submitted in order to cover the entire proposed AVA boundary.<sup>18</sup> TTB asks petitioners to draw the proposed boundary on the USGS map to match the AVA petition's boundary narrative. During the AVA petition process, TTB, generally in consultation with the petitioner, may edit the boundary narrative to provide better clarity and adjust the proposed boundaries drawn on the USGS map by the petitioner.

The public can access a narrative description of the AVA boundary in the NPRM and an image of a rendition of the AVA boundary that may have been included as part of the petition. However, the USGS map detailing the proposed AVA boundary is not easily accessible to the public.<sup>19</sup> The AVA Program Manager said that it would be beneficial if the USGS map could be viewed electronically with the ability to zoom in on features and plot coordinates on the map similar to the capabilities of other maps available online.

According to the RRD Deputy Director and AVA Program Manager, TTB does not have the resources to make the USGS map(s) available online as they do with other AVA documentation during the rulemaking process. Additionally, the public can obtain a visual representation of the AVA designated area boundary by visiting

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<sup>17</sup> The public dockets for rulemakings can be found at Regulations.gov launched in 2003 to provide public users access to Federal regulatory content such as posted public comments, supporting analyses, Federal Register notices, and rules.

<sup>18</sup> Our review of those AVA petitions that were designated during our audit period found that the AVA petitions, on average, contained six USGS maps in order to cover the entire AVA boundary. Each map dimension was approximately 2 feet by 2 feet.

<sup>19</sup> A single copy of the USGS map or maps on which an AVA boundary is detailed is stored at TTB headquarters in Washington D.C.

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TTB's Information Resource Center or filing a request under the Freedom of Information Act.<sup>20</sup>

By making these USGS maps readily available to the public, TTB would meet the intent of the President's memorandum on transparency. This memorandum directs Executive departments and agencies to harness new technologies to put information about their operations and decisions online and readily available to the public. The information is expected to be disclosed rapidly in forms that the public can readily find and use.<sup>21</sup>

## Recommendations

We recommend that the Administrator of TTB do the following:

1. Develop written standard operating procedures for the AVA program that properly document the fundamental steps taken during the AVA designation process.

### Management Comments

Management concurred with our recommendation. TTB stated that while TTB's AVA designation process follows AVA regulations and the AVA Manual for Petitioners, which details the AVA petition processing, rulemaking, and its administration of the program, TTB intends to develop written standard operating procedures for the AVA program.

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<sup>20</sup> Freedom of Information Act is codified under 5 U.S.C. §552 and is a Federal law that allows for the full or partial disclosure of previously unreleased information and documents controlled by the United States Government.

<sup>21</sup> Executive Office of the President Memorandum for the Heads of Executive Departments and Agencies, *Transparency and Open Government* (Jan. 21, 2009).

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OIG Comment

Management's response meets the intent of our recommendation. TTB will need to record the estimated date for completing its planned corrective action in JAMES.

2. Examine the capability to provide USGS maps as digital documents to enhance and improve transparency of the AVA program both during and after the rulemaking process, including consideration of the cost and benefits for doing this.

Management Comments

Management concurred with our recommendation. TTB stated that it began with a feasibility assessment for providing digitized maps of established AVAs in fiscal year 2016. If future funding is available, TTB, will assess the feasibility for providing digitized maps for new and modified AVAs during the rulemaking process. TTB issued a task order with cost estimates for fiscal years 2016 and 2017 to digitize all established AVA boundary maps, and has begun work on this task order as funding permits.

OIG Comment

Management's response meets the intent of our recommendation. TTB has begun examining its capability for providing digitized maps using feasibility assessments and the issuance of a task order to begin the process. TTB will need to record the estimated date for completing its planned corrective action in JAMES.

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We appreciate the cooperation and courtesies extended to our staff by TTB personnel. If you wish to discuss the report, you may contact me at (617) 223-8638 or Ken O'Loughlin, Audit Manager, at (617) 223-8624.

Sharon Torosian  
Director

Our objectives were to assess the controls in place over the Department of the Treasury's Alcohol and Tobacco Tax and Trade Bureau's (TTB) program to designate American Viticultural Areas (AVA) and determine whether decisions to designate AVAs are made consistently and in accordance with established regulations and guidance.

To accomplish our objectives, we interviewed TTB's Regulations and Rulings Division Director, Deputy Director, and AVA Program Manager at TTB's headquarters in Washington D.C.

External to TTB, we interviewed representatives and petitioners from the wine industry to obtain their perspective on TTB's AVA program. These included WineAmerica, Wine Institute, Compliance Service of America, Walla Walla Valley Wine Alliance, Idaho Wine Commission and The Rocks District of Milton-Freewater AVA.

We reviewed applicable laws, regulations, and TTB guidance, associated with TTB's authority to designate AVAs. We obtained documentation for our review of TTB's AVA designation process for the audit period January 1, 2012 through March 1, 2016 from TTB as well as from publicly available sources at TTB's website and Regulations.gov. We requested and received the following documentation from TTB.

- A listing of all AVA petitions received at TTB during the audit period and the notices sent to the petitioners acknowledging receipt of the petitions.
- The rejection letters sent to the petitioners for those petitions that were not perfected.
- The letters sent to the petitioners notifying them that the petitions had been perfected and would proceed to rulemaking for established or modified AVAs.
- All documentation for AVA petitions that were established or modified.

TTB received 51 AVA petitions during the audit period, and we reviewed all actions taken on these petitions. We reviewed all pertinent documentation including TTB's case files for the 11 AVA petitions that were established or modified during the audit period to ensure they were processed in compliance with AVA regulations and TTB guidance. In addition, we verified that TTB followed all relevant steps in the petition process for the 7 AVA petitions in which a Notice of Proposed Rulemaking was published in the Federal Register, the 23 petitions that were rejected, and the 10 petitions that were perfected.

We also obtained and reviewed TTB's analyses of the AVA program as well as related data. We requested from TTB any reports, studies, assessments, and initiatives related to the program, as well as any TTB policies, procedures, and guidance.

We performed our fieldwork from February 2016 through June 2016.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix 2  
Management Response



ADMINISTRATOR

DEPARTMENT OF THE TREASURY  
ALCOHOL AND TOBACCO TAX AND TRADE BUREAU  
WASHINGTON, D.C. 20005

March 27, 2017

Ms. Sharon Torosian  
Director, Eastern Field Audit Office  
Office of Inspector General  
Department of the Treasury  
408 Atlantic Ave., Suite 330  
Boston, MA 02110

Dear Ms. Torosian,

Thank you for providing the Alcohol and Tobacco Tax and Trade Bureau (TTB) an opportunity to respond to the Office of Inspector General's (OIG's) draft audit report *TTB Appropriately Designates American Viticultural Areas, But Improvements Would Strengthen the Program*, provided February 21, 2017. TTB is pleased with the OIG's overall audit conclusion that TTB designated American Viticultural Areas (AVAs) consistently in accordance with law, Federal regulations, and TTB guidance. TTB also appreciates that the OIG's draft audit report noted that all industry members interviewed by the OIG found TTB's regulations to be clear and the AVA program to be sufficiently transparent.

As demonstrated by the OIG's audit conclusion, TTB is committed to the integrity of the AVA program and the clarity of its regulations and other guidance. This commitment is exemplified by the TTB-initiated modernization of the AVA regulations in 2011, which clarified the existing AVA regulations and improved the integrity and transparency of the AVA program, as noted in the OIG's draft report. TTB appreciates the OIG's recommendations to further TTB's efforts to improve the AVA program. Our responses to the OIG's recommendations are as follows:

1. Develop written standard operating procedures for the AVA program that properly document the fundamental steps taken during the AVA designation process.

While TTB's internal AVA designation process strictly follows the procedural-specific AVA regulations<sup>1</sup> and TTB's publicly available 34-page *AVA Manual for Petitioners*<sup>2</sup> that details (1) AVA petition processing, (2) AVA rulemaking, and (3) TTB's overall administration of the AVA program, TTB concurs with the OIG's recommendation and intends to develop written standard operating procedures for the AVA program.

<sup>1</sup> See 27 C.F.R., pt. 9, subpt. A and subpt B.

<sup>2</sup> See *AMERICAN VITICULTURAL AREA (AVA) MANUAL FOR PETITIONERS*, TTB P 5120.4 (Washington, D.C.: September 2012).

[www.TTB.gov](http://www.TTB.gov)

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2. Examine the capability to provide United States Geological Survey (USGS) maps of AVA boundaries as digital documents to enhance and improve transparency of the AVA program both during and after the rulemaking process, including consideration of any related cost and benefits.

TTB concurs with and has begun implementing the OIG's recommendation to provide digital USGS maps of AVA boundaries. Based on TTB's labeling and regulatory staff experience and informal comments from the public, TTB decided to first proceed with a feasibility assessment for providing digitized maps of previously established AVAs, after which TTB will assess the feasibility and resources needed to also provide digitized maps for proposed new and/or modified AVAs during the rulemaking process.

TTB would like to underscore that it self-identified the need to provide digitized AVA boundary maps as early as FY 2012 and began a self-initiated feasibility assessment for digitizing all established AVA boundary maps in FY 2016. As part of TTB's assessment, TTB obtained a rough order of magnitude cost estimate in FY 2016 and, in FY 2017, issued a task order to digitize all established AVA boundary maps; work on this task order has since commenced. TTB will continue its effort to provide digital maps of established AVA boundaries to the public, as funding permits.<sup>3</sup> If future funding is available, TTB will also assess the feasibility of providing digital maps of proposed new and/or modified AVA boundaries to the public during the rulemaking process.

TTB would like to thank your office and audit team for the thoroughness of your draft audit report. TTB's administration and oversight of the AVA program helps to ensure the integrity and transparency of AVAs in the U.S. and global wine markets and allows winemakers to provide important information to consumers about the origin of wines they may purchase, and we appreciate the OIG's recommendations to improve this program.

Sincerely,

/s/

John J. Manfreda  
Administrator

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<sup>3</sup> The task order's period of performance extends to January 2, 2018, with option years extending to January 2, 2022. The task order's option years only provide funding for the software needed to digitize AVA boundaries.

Appendix 3  
Major Contributors to This Report

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Ken O'Loughlin, Audit Manager  
Jeanne DiFruscia, Auditor-In-Charge  
James Shepard, Auditor  
Brigit Larsen, Referencer

**The Department of the Treasury**

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Fiscal Assistant Secretary  
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Office of Strategic Planning and Performance Improvement  
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**U.S. Senate**

**Chairman and Ranking Member**

Committee on Appropriations

**Chairman and Ranking Member**

Subcommittee on Financial Services and General Government  
Committee on Appropriations

**Chairman and Ranking Member**

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**Chairman and Ranking Member**

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