

Congress of the United States

Washington, DC 20515

March 31, 2025

Gene L. Dodaro
Comptroller General of the United States
U.S. Government Accountability Office
441 G Street, N.W.
Washington, DC 20548

Dear Mr. Dodaro:

We the Ranking Members of the House and Senate Budget Committees request that the Government Accountability Office (GAO) investigate several Trump Administration directives and their consistency with the Impoundment Control Act.

On January 20, 2025, President Trump ordered a “90-day pause in United States foreign development assistance for assessment of programmatic efficiencies and consistency with United States foreign policy”.¹ Pursuant to this order, the Department of State paused “all U.S. foreign assistance funded by or through the State Department and U.S. Agency for International Development (USAID) for review.”²

Also on January 20, President Trump “immediately pause[d] the disbursement of funds” appropriated through the Inflation Reduction Act of 2022 (Public Law 117-169) or the Infrastructure Investment and Jobs Act (Public Law 117-58).³ On January 27, 2025, the Office of Management and Budget (OMB) instructed executive branch agencies to “temporarily pause all activities related to obligation or disbursement of all Federal financial assistance, and other relevant agency activities that may be implicated by the executive orders.”⁴ Later, OMB rescinded this guidance but declared that the previous orders were still in force.

More recently, on March 3, 2025, President Trump suspended the delivery of military assistance to Ukraine.⁵ White House officials indicated this was over policy concerns and not for programmatic reasons. Though military aid was resumed around March 11th, 2025, we are

¹ White House, Executive Order, *Reevaluating and Realigning United States Foreign Aid*, <https://www.whitehouse.gov/presidential-actions/2025/01/reevaluating-and-realigning-united-states-foreign-aid/> (last visited January 28, 2025).

² Department of State, Press Statement, *Implementing the President’s Executive Order on Reevaluating and Realigning United States Foreign Aid* (January 26, 2025), available at <https://www.state.gov/implementing-the-presidents-executive-order-on-reevaluating-and-realigning-united-states-foreign-aid/>.

³ White House, Executive Order, *Unleashing American Energy*, <https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-american-energy/> (last visited January 28, 2025).

⁴ Office of Management and Budget, Memorandum, *Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs* (January 27, 2025).

⁵ Department of State, Fact Sheet, *U.S. Security Cooperation with Ukraine* (March 4, 2025), available at <https://www.state.gov/bureau-of-political-military-affairs/releases/2025/01/u-s-security-cooperation-with-ukraine>.

concerned this pause may have been an illegal impoundment with negative foreign policy and national security implications.


The Constitution grants the President no unilateral authority to withhold funds from obligation. Instead, Congress has vested the President with strictly circumscribed authority to impound or withhold budget authority only in limited circumstances as expressly provided in the Impoundment Control Act. The executive branch may withhold amounts from obligation only if the President transmits a special message to Congress that includes the amount of budget authority proposed for withholding and the reason for the proposal (2 U.S.C. §§ 683–684).

We are concerned about the recent pauses in funding pursuant to the actions and request that GAO investigate these actions and their consistency with the Impoundment Control Act.

Sincerely,

A handwritten signature in blue ink that reads "Brendan F. Boyle". The signature is fluid and cursive, with the first name being the most prominent.

Brendan F. Boyle
Ranking Member
House Committee on the Budget

A handwritten signature in blue ink that reads "Jeffrey A. Merkley". The signature is fluid and cursive, with the last name being the most prominent.

Jeffrey A. Merkley
Ranking Member
Senate Committee on the Budget