



B-337805

September 12, 2025

The Honorable JD Vance
President of the Senate

The Honorable John Thune
Senate Majority Leader

The Honorable Chuck Schumer
Senate Minority Leader

The Honorable Mike Johnson
Speaker of the House of Representatives

The Honorable Hakeem Jeffries
House Minority Leader

Subject: *Impoundment Control Act of 1974: Review of the President's Special
Message of August 28, 2025*

Under section 1012 of the Congressional Budget and Impoundment Control Act of 1974 (ICA), the President may transmit to Congress a special message proposing that Congress rescind budget authority. Pub. L. No. 93-344, title X, § 1012, 88 Stat. 297, 333–34 (July 12, 1974), 2 U.S.C. § 683. Pursuant to this authority, on August 28, 2025, the President transmitted to the House of Representatives a special message proposing rescissions from 15 appropriation accounts. 171 Cong. Rec. H3715 (daily ed. Aug. 29, 2025); 90 Fed. Reg. 42613 (Sept. 3, 2025). The President transmitted this special message to the Senate eleven days later on September 8, 2025. 171 Cong. Rec. S6400 (daily ed. Sept. 8, 2025).¹ Where the President properly transmits a special message, an agency may withhold

¹ Pursuant to 2 U.S.C. § 685, a special message shall be transmitted the same day to the House of Representatives and to the Senate. Because the special message was not transmitted on the same day, we are using the later date of receipt by the Senate. Based on that date, we project that the 45-day period for congressional consideration of the special message began on September 9, 2025, and will run until October 23, 2025.

corresponding amounts from obligation for a limited time period. ICA, § 1012(b), 2 U.S.C. § 683(b).

We are submitting this letter pursuant to our statutory duty to assist Congress by reviewing the special message. ICA, § 1014(b), 2 U.S.C. § 685(b). We performed a review of each of the President's 15 proposed rescissions:

1. Consistent with section 1015(b) of the ICA, we concluded that each proposed rescission was properly classified as a rescission proposal and not as a deferral. 2 U.S.C. § 686(b).
2. After the President transmits the special message, the Office of Management and Budget (OMB) transmits updated apportionments to the directly affected agencies. These apportionments may instruct agencies to withhold budget authority from obligation pending congressional action on the proposed rescission. On August 29, 2025, OMB approved a letter apportionment indicating that amounts will be withheld from obligation on the apportionment for each account consistent with the special message. See *OMB Approved Apportionment – FY 2025* (Aug. 29, 2025), available at: <https://appportionment-public.max.gov/Fiscal%20Year%202025/Multiple%20Agencies/PDF/FY2025%20Department%20of%20State%20and%20International%20Assistance%20Programs%20letter%20apportionment.pdf.pdf> (last visited Sept. 9, 2025).
3. We contacted officials at two agencies or entities directly affected by the proposed rescissions (*i.e.*, the Department of State and the U.S. Agency for International Development), to determine whether they withheld budget authority from obligation in a manner consistent with the special message. We did not receive a response from either agency.²
4. Section 1001(4) of the ICA provides that the Act does not supersede any provision of law which requires the obligation of budget authority or the making of outlays thereunder, also known as the fourth disclaimer.³

² The Department of State acknowledged receipt of our message, but did not provide responses prior to September 11, 2025.

³ 2 U.S.C. § 681(4). Section 681 sets out four disclaimers with respect to the application of the ICA. The first three disclaimers, none of which are relevant here, provide that nothing in the ICA shall be construed as (1) asserting or conceding the constitutional powers or limitations of Congress or the President; (2) ratifying or approving any impoundment except as pursuant to statutory authority; or (3) affecting the claims or defense of any party to litigation concerning any impoundment. See 2 U.S.C. §§ 681(1)–(3).

2 U.S.C. § 681(4). We reviewed each of the 15 proposals and conclude that none of the proposals were inconsistent with this provision.

5. To identify additional facts surrounding each proposed rescission and its probable effects, we determined whether prior GAO work addressed the subject matter of each proposal. In the Enclosure we note the existence of this prior work where applicable.
6. Based on GAO's review, all 15 accounts implicated by the special message have an assigned treasury appropriation fund symbol indicating expiration at the end of fiscal year 2025. The 45-day period for congressional consideration is scheduled to run until October 23, 2025, after the end of fiscal year 2025. GAO has previously concluded that the ICA does not permit the withholding of funds past their date of expiration, even if the 45-day period for congressional consideration has not passed. See B-330330, Dec. 10, 2018. In that decision, we explained that under the plain language of the ICA, its legislative history, Supreme Court case law and the overarching constitutional framework, such a result is not permitted by law and amounts proposed for rescission must be made available for prudent obligation before the amounts expire. See *id.* This is because the plain language of section 1012(b) provides that absent Congress's completion of action on a rescission bill rescinding all or part of amounts proposed to be rescinded, such amounts must be made available for obligation. *Id.*

If you have any questions, please contact me or Shirley Jones, Managing Associate General Counsel at (202) 512-8156.



Edda Emmanuelli Perez
General Counsel

Enclosure

ENCLOSURE

R25-23

**Department of State
International Organizations and Conferences
Contributions to International Organizations (019-1126 2025/2025)⁴
Amount proposed for rescission: \$520,500,000**

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. The Department of State (State) did not respond to questions from GAO prior to September 11, 2025, regarding whether it withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that it would be a first step to engaging in strong reforms across the United Nations (UN).

In [GAO-24-106127](#), we reported on challenges to U.S. employment at UN organizations, including lengthy hiring processes, unclear compensation packages, and a perception, among American employees at certain UN organizations, that they preferred to hire outside candidates for senior positions. Of the five UN organizations we selected for review, none met its targets for American representation among its employees for 2015 to 2021, but the World Health Organization was one of these organizations to do so for 2022.

R25-24

**Department of State
International Organizations and Conferences
Contributions to International Peacekeeping Activities (019-1124 2025/2025)
Amount proposed for rescission: \$392,534,000**

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State did not respond to questions from GAO prior to September 11, 2025, regarding

⁴ The parenthetical numbers throughout the special message indicate the Department of Treasury's symbols for the appropriation account in question, known as the Treasury Appropriation Fund Symbol (TAFS). A list of searchable accounts is available here: <https://fiscal.treasury.gov/files/fast-book/fastbook-november-2021.pdf>. For this special message all of the accounts expire at the end of fiscal year 2025.

whether it withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that it would be a first step to engaging in strong reforms across the UN.

In [GAO-18-243](#), we found that the United States is the largest financial contributor to UN peacekeeping operations, providing an average of about 28 percent of total funding annually. The UN reported a cost of about \$2.4 billion to carry out 39 months of peacekeeping operations in the Central African Republic. We estimated it would have cost the United States more than twice as much, nearly \$5.7 billion, to carry out a comparable operation. Higher U.S. costs would result from higher standards for facilities, intelligence, and medical services, and greater airlifting of supplies and equipment. We also found that while U.S. peacekeeping operations would have greater military capability, the UN would have greater international acceptance.

R25-25

Department of State

Other

Democracy Fund (019-1121 2020/2025)

Amount proposed for rescission: \$1,800,498

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State did not respond to questions from GAO prior to September 11, 2025, regarding whether it withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that this rescission would return funding from wasteful foreign assistance programs to taxpayers in alignment with America First foreign policy.

In [GAO-20-173](#), we reported that State and the United States Agency for International Development (USAID) had defined roles for democracy assistance, including that which was funded with the Democracy Fund. We also found that State and USAID coordinated assistance in various ways, but State's Bureau of Democracy, Human Rights, and Labor (DRL) could improve its information sharing with embassy officials to allow them to better coordinate projects. We recommended that it do so, but, as of December 2024, DRL had not fully implemented this recommendation.

In [GAO-18-136](#), we reported on the funding State, USAID and the National Endowment for Democracy provided in democracy assistance funding, including from the Democracy Fund. However, we found that the amount State obligated for

democracy assistance could not reliably be determined because its data were incomplete, nonstandard or inaccurate. We recommended that it do so, and State improved the reliability of its data on democracy assistance funding.

We have also reported on democracy assistance provided to specific countries. Specifically, in [GAO-25-107712](#), we reported on USAID, State, and National Endowment for Democracy efforts to mitigate security risks to their awardees of democracy assistance in Cuba. We found that all three provide general information on risks to Cuba democracy assistance awardees and take steps to help awardees mitigate risks at various points in the award process. However, USAID does not prepare security risk assessments for each award and does not have a documented process for collecting security risk information before implementation, which we recommended that they develop to better inform their awardees' risk responses. In [GAO-20-158](#), we reported on democracy promotion activities in North Macedonia in fiscal years (FYs) 2012 to 2017 that USAID, State, and the National Endowment for Democracy provided to variously support rule of law and human rights, governance, political competition and consensus building, civil society, rule of law, and an independent media and free flow of information. We also found that USAID generally complied with its policies intended to ensure a fair and transparent selection process for democracy assistance awards to North Macedonia.

R25-26

Department of State

Other

Democracy Fund (072-019-1121 2020/2025)

Amount proposed for rescission: \$56,107

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State and USAID did not respond to questions from GAO prior to September 11, 2025, regarding whether they withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that this rescission would return funding from wasteful foreign assistance programs to taxpayers in alignment with America First foreign policy.

GAO's prior reports relevant to this proposed rescission are reflected in the entry for R25-25, *supra*.

R25-27

Department of State

Other

Democracy Fund (019-1121 2024/2025)

Amount proposed for rescission: \$188,314,470

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State did not respond to questions from GAO prior to September 11, 2025, regarding whether it withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that this rescission would return funding from wasteful foreign assistance programs to taxpayers in alignment with America First foreign policy.

GAO's prior reports relevant to this proposed rescission are reflected in the entry for R25-25, *supra*.

R25-28

Department of State

Other

Democracy Fund (072-019-1121 2024/2025)

Amount proposed for rescission: \$132,117,226

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State and USAID did not respond to questions from GAO prior to September 11, 2025, regarding whether they withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that this rescission would return funding from wasteful foreign assistance programs to taxpayers in alignment with America First foreign policy.

GAO's prior reports relevant to this proposed rescission are reflected in the entry for R25-25, *supra*.

R25-29

International Assistance Programs International Security Assistance Peacekeeping Operations (019-011-1032 2024/2025) Amount proposed for rescission: \$110,384,428

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State did not respond to questions from GAO prior to September 11, 2025, regarding whether it withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that this account is a slush fund used to support projects well beyond a core security focus.

In [GAO-17-255R](#), we describe activities funded with the Peacekeeping Operations (PKO) account among other security assistance efforts to build partner capacity. Specifically, PKO has been used to support multilateral peacekeeping and regional stability operations that are not funded through the UN. Funds also addressed key gaps in capabilities to enable countries and regional organizations to participate in peacekeeping, humanitarian operations, and counterterrorism operations and to reform security forces in the aftermath of conflict. Three PKO-funded efforts are the:

- Global Peacekeeping Operations Initiative (GPOI), which aims to build sustainable, self-sufficient peace operations training capacity in partner countries and provide support (including equipment and technical assistance) to enable countries to deploy to UN and regional peace operations;
- Trans-Sahara Counterterrorism Partnership (TSCTP), which assists partners in West and North Africa to increase their immediate and long-term capabilities to address terrorist threats and prevent the spread of violent extremism; and
- Partnership for Regional East Africa Counterterrorism (PREACT), which aims to build the capacity and cooperation of military, law enforcement, and civilian actors across East Africa to counter terrorism using law enforcement, military, and development resources.

In [GAO-08-754](#), we reported on the setup of GPOI, which from its inception in 2005 through 2008 supported 52 countries. We made eight recommendations to State that it implemented to enhance GPOI's effectiveness, to better identify program outcomes, and to ensure proper screening for human rights violations.

In [GAO-14-518](#), we reported on agencies' tracking of TSCTP funding, interagency collaboration, and agencies' consideration of partner country needs, absorptive

capacities, and other donor needs when selecting TSCTP activities. We made two recommendations to State, which it has implemented, to (1) take steps to routinely collect and assess information to enable more efficient analysis and reporting on the status of funds allocated for TSCTP and (2) to ensure the Department of Justice was better integrated into TSCTP coordination efforts. We also found that U.S. agencies had used various means to consider partner country needs, absorptive capacities, and other donor efforts when selecting TSCTP activities, including assessment reports, meetings with host governments, and bilateral and multilateral outreach to other donors.

In [GAO-14-502](#), we reported on State's management of PREACT funding, making three recommendations to State to improve documentation of its selection process for PREACT activities and to collect and maintain centralized information on PREACT activities and funding across countries. State made improvements to PREACT by implementing these recommendations.

R25-30

**International Assistance Programs
International Security Assistance
Peacekeeping Operations (019-011-1032 2025/2025)
Amount proposed for rescission: \$326,214,947**

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State did not respond to questions from GAO prior to September 11, 2025, regarding whether it withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that this account is a slush fund used to support projects well beyond a core security focus.

GAO's prior reports relevant to this proposed rescission are reflected in the entry for R25-29, *supra*.

R25-31

**International Assistance Programs
International Security Assistance
Peacekeeping Operations (011-1032 2024/2025)
Amount proposed for rescission: \$2,500,000**

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State did not respond to questions from GAO prior to September 11, 2025, regarding

whether it withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that this account is a slush fund used to support projects well beyond a core security focus.

GAO's prior reports relevant to this proposed rescission are reflected in the entry for R25-29, *supra*.

R25-32

**International Assistance Programs
International Security Assistance
Peacekeeping Operations (019-011-1032 2020/2025)
Amount proposed for rescission: \$5,850,726**

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State did not respond to questions from GAO prior to September 11, 2025, regarding whether it withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that this account is a slush fund used to support projects well beyond a core security focus.

GAO's prior reports relevant to this proposed rescission are reflected in the entry for R25-29, *supra*.

R25-33

**International Assistance Programs
Agency for International Development
Development Assistance (072-1021 2017/2025)
Amount proposed for rescission: \$3,360**

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State and USAID did not respond to questions from GAO prior to September 11, 2025, regarding whether they withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that it aligns with the Administration's efforts to return funding from wasteful USAID programs to the American taxpayers.

In [GAO-22-104612](#), we reviewed how U.S. agencies coordinate global food security assistance through Feed the Future to implement the Global Food Security Strategy. We found that USAID led coordination of this assistance in multiple ways, but that this coordination could be improved. We recommended that USAID take steps to ensure all relevant U.S. agencies are included in the planning and coordination of food security assistance in each target country and work with other participating agencies to establish a mechanism, such as a shared database, to ensure that each agency has ready access to information about the other agencies' current and planned U.S. global food security assistance. As of December 2024, USAID had developed plans for addressing the first recommendation and had not yet addressed the second recommendation.

In [GAO-21-548](#), we reviewed USAID's monitoring and public reporting of Feed the Future assistance and its assessment of countries' potential to graduate from receiving Feed the Future assistance. We made eight recommendations to improve these areas, all of which USAID has implemented.

In [GAO-21-269](#), we reviewed USAID assistance to micro, small and medium-sized enterprises and made six recommendations for how USAID could better target and monitor this assistance. As of August 2024, USAID had partially addressed a recommendation to establish a method to identify the total funding subject to the requirements of the Women's Entrepreneurship and Empowerment Act of 2018 for targeting assistance to the very poor and women. Other recommendations to ensure bureaus and missions understood their roles in meeting this requirement, to establish definitions and appropriately disaggregate data to help ensure compliance with targeting requirements under the Act, to ensure it collects data from all relevant missions and bureaus, and to ensure the reliability of related data had not yet been implemented.

In [GAO-20-163R](#), we reported on the assistance provided to Central America from FYs 2013 to 2018, including about \$649 million disbursed over those years to respond to longer-term challenges to human and economic security in a range of areas, including economic growth, education, and governance.

In [GAO-17-224](#), we reviewed implementation costs of Title II of the Food for Peace Act. We found that, to better meet beneficiaries' needs, USAID used funds from accounts authorized by the Foreign Assistance Act, including the Development Assistance account, along with 202(e) funding, to implement and support projects. We also found that while USAID and its partners had various controls for financial oversight of related funding, there were certain deficiencies in USAID oversight. We made five recommendations to USAID, including to conduct financial reviews, collect monitoring data, and assess risks, all of which USAID implemented.⁵

⁵ GAO did not identify these reports in our review of the President's June 3, 2025, special message, B-337581, Jun. 17, 2025, which also proposed rescissions from the Development Assistance account. The Development Assistance account was

R25-34

**International Assistance Programs
Agency for International Development
Development Assistance (072-1021 2020/2025)
Amount proposed for rescission: \$7,088,936**

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State and USAID did not respond to questions from GAO prior to September 11, 2025, regarding whether they withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that it aligns with the Administration's efforts to return funding from wasteful USAID programs to the American taxpayers.

GAO's prior reports relevant to this proposed rescission are reflected in the entry for R25-33, *supra*.

R25-35

**International Assistance Programs
Agency for International Development
Development Assistance (072-1021 2021/2025)
Amount proposed for rescission: \$31,649,095**

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State and USAID did not respond to questions from GAO prior to September 11, 2025, regarding whether they withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that it aligns with the Administration's efforts to return funding from wasteful USAID programs to the American taxpayers.

GAO's prior reports relevant to this proposed rescission are reflected in the entry for R25-33, *supra*.

one of several funding sources for the activities audited in the reports. However, we have since determined the above-referenced referenced reports may be useful to Congress so we have included them in this review.

R25-36

**International Assistance Programs
Agency for International Development
Development Assistance (072-1021 2023/2025)
Amount proposed for rescission: \$6,587,000**

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State and USAID did not respond to questions from GAO prior to September 11, 2025, regarding whether they withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that it aligns with the Administration's efforts to return funding from wasteful USAID programs to the American taxpayers.

GAO's prior reports relevant to this proposed rescission are reflected in the entry for R25-33, *supra*.

R25-37

**International Assistance Programs
Agency for International Development
Development Assistance (072-1021 2024/2025)
Amount proposed for rescission: \$3,180,239,598**

According to an OMB letter apportionment signed on August 29, 2025, funds are currently being withheld from this account in the above-referenced amount. State and USAID did not respond to questions from GAO prior to September 11, 2025, regarding whether they withheld budget authority from obligation in a manner consistent with the special message and OMB's August 29, 2025, letter apportionment.

The justification for this proposal states that it aligns with the Administration's efforts to return funding from wasteful USAID programs to the American taxpayers.

GAO's prior reports relevant to this proposed rescission are reflected in the entry for R25-33, *supra*.