

**U.S. Agencies Should Establish Targets to Better Assess Effectiveness**

GAO-25-107079

September 2025




A report to congressional committees

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**What GAO Found**

GAO independently identified three broad categories for the objectives of U.S. sanctions and export controls on Russia (see figure). U.S. agencies have made progress toward these objectives, but Russia has circumvented some U.S. sanctions and export controls. Specifically, GAO found that Russia's economic growth was about 6 percentage points lower in 2022 than what might have happened absent the events in 2022, including the invasion of Ukraine and sanctions. However, GAO's analysis did not find that economic growth was statistically different than expected in 2023 and 2024. A price cap on Russian oil likely kept Russian oil production and exports relatively stable but Russian actions, such as the use of a "shadow fleet" to export oil, limited the cap's efficacy. U.S. agencies assess that export controls have hindered but not completely prevented Russia's efforts to obtain U.S. military technologies. While U.S. agencies have taken various actions to hold malign Russian actors accountable, including freezing assets, the agencies reported challenges in assessing their effectiveness.

**GAO-Identified Categories for the Objectives of U.S. Sanctions and Export Controls on Russia**

	Impacting Russia's economy
	Inhibiting Russia's war effort
	Holding accountable those who support Russia's war or abuse human rights

Source: GAO analysis of the Departments of the Treasury, State, and Commerce documents and interviews with agency officials; GAO, Burbuzin/stock.adobe.com, Esther\_Design/stock.adobe.com, rohmard/stock.adobe.com, (icons). | GAO-25-107079

U.S. agencies primarily responsible for implementing sanctions and export controls on Russia have not established clearly defined objectives linked to measurable outcomes with targets for their activities. As a result, agencies cannot fully assess progress towards achieving their objectives, thus limiting the U.S. government's ability to determine the effectiveness of its broader sanctions and export controls efforts related to Russia. This information is crucial for improving current efforts and informing the future use of sanctions and export controls.

As of September 30, 2024, U.S. agencies had obligated about \$164 million in Ukraine supplemental funding for activities related to sanctions and export controls on Russia. These agencies used this funding for staff and investigative tools, among other uses. For example, a Department of State bureau used supplemental funding to increase the size of its workforce dedicated to identifying Russian sanctions targets. GAO found that two State bureaus have not assessed risks to these sanctions activities when their supplemental funding expires on September 30, 2025. As a result, the bureaus cannot develop an effective plan to sustain or restructure these activities, threatening broader goals.

**Why GAO Did This Study**

The U.S. and its allies responded to Russia's 2022 invasion of Ukraine with wide-ranging sanctions and export controls, including a price cap on Russian oil. U.S. agencies received additional resources under Ukraine supplemental appropriations acts, some of which they used for sanctions and export controls.

Congress included a provision in Public Law 117-328 for GAO to conduct oversight of Ukraine supplemental funding. For U.S. sanctions and export controls related to Russia's invasion of Ukraine, this report examines progress toward objectives and the extent to which U.S. agencies have established objectives with measurable outcomes and assessed risks to activities funded by supplemental resources, among other objectives.

GAO analyzed agency documents and data, performed economic analyses, reviewed relevant literature, interviewed agency officials, and selected and interviewed 11 knowledgeable stakeholders, including former government officials and economists. GAO selected these stakeholders based on their expertise related to U.S. sanctions or export controls.

**What GAO Recommends**

GAO recommends that U.S. agencies define objectives with targets for sanctions and export controls on Russia, assess progress toward these objectives, and that two State offices assess the risks to their programs without future supplemental funding. Commerce and Treasury agreed with the recommendations. State partially agreed.