

GAO OPINIONS ADDRESSING WHETHER AGENCY ACTIONS ARE RULES SUBJECT TO THE CRA

Date	Administration in Office	B-Number	Agency / Office
1996-09-16	Clinton	B-274505-1	USDA (Secretary)
1997-07-03	Clinton	B-275178-1	USDA Forest Service
1997-11-10	Clinton	B-278224	Interagency (American Heritage Rivers)
1999-01-20	Clinton	B-281575-0	EPA
2000-10-17	Clinton	B-286338	Farm Credit Administration
2001-05-14	Bush	B-287557	DOI (Fish and Wildlife Service)
2003-02-28	Bush	B-291906-0	VA
2003-05-19	Bush	B-292045	VA
2008-04-17	Bush	B-316048	HHS / CMS
2012-09-04	Obama	B-323772	HHS / ACF
2017-10-19	Trump I	B-329272	OCC / Federal Reserve / FDIC
2017-10-23	Trump I	B-238859	USDA Forest Service
2017-11-15	Trump I	B-329065	DOI / BLM
2017-12-05	Trump I	B-329129	CFPB
2018-05-01	Trump I	B-329206	State Dept / USAID
2018-05-17	Trump I	B-329916	IRS
2018-09-10	Trump I	B-329926	SSA
2018-12-19	Trump I	B-330190	DOJ
2019-02-07	Trump I	B-330288	Commerce (Census Bureau)
2019-07-15	Trump I	B-330811	HHS / Treasury
2019-10-22	Trump I	B-330843	Federal Reserve

2019-10-22	Trump I	B-331324	Federal Reserve
2020-04-16	Trump I	B-331560	Federal Reserve
2020-08-13	Trump I	B-332233	FCC
2020-12-17	Trump I	B-331171	HUD
2021-12-14	Biden	B-333501	CDC
2022-03-17	Biden	B-333725	Safer Federal Workforce Task Force
2022-07-28	Biden	B-333732	USDA
2022-12-15	Biden	B-334032	FHWA
2023-02-09	Biden	B-334221	OPM
2023-02-09	Biden	B-334400	EPA
2023-03-17	Biden	B-334644	Dept of Education
2023-04-05	Biden	B-334032.2	FHWA
2023-04-06	Biden	B-334237	OPM
2023-06-05	Biden	B-334146	USDA
2023-06-05	Biden	B-334411	USDA / FNS
2023-07-05	Biden	B-334045	DHS
2023-07-06	Biden	B-334995	FDA
2023-09-26	Biden	B-335115	DoD
2023-10-18	Biden	B-335488	DOT
2023-10-31	Biden	B-334540	SEC
2023-11-29	Biden	B-335316	CDC
2023-11-30	Biden	B-334309	EPA
2024-01-24	Biden	B-335516	Dept of Education

2024-02-27	Biden	B-335781	DOI
2024-03-07	Biden	B-335424	FHFA
2024-05-01	Biden	B-335142	OMB / DOL
2024-05-01	Biden	B-335515	U.S. Sentencing Commission
2024-05-06	Biden	B-335175	Commerce
2024-05-08	Biden	B-335030	FERC
2024-05-23	Biden	B-335714	USTR
2024-05-28	Biden	B-336146	NIST / Commerce
2024-07-08	Biden	B-335629	DOI / BOEM
2024-08-06	Biden	B-336217	Federal Reserve
2024-08-29	Biden	B-336512	OMB
2024-10-01	Biden	B-336260	FHFA
2025-03-06	Trump II	B-337179	EPA
2025-05-28	Trump II	B-337059	DOI / FWS
2025-06-25	Trump II	B-337163	DOI / BLM
2025-06-25	Trump II	B-337175	DOI / BLM
2025-06-25	Trump II	B-337200	DOI / BLM
2025-07-24	Trump II	B-337234	DOI / BLM
2025-08-12	Trump II	B-337392	State Dept
2025-08-25	Trump II	B-337330	DOI / BLM
2025-08-27	Trump II	B-337397	HHS
2025-08-28	Trump II	B-337370	EPA
2025-09-11	Trump II	B-337380	DOI

2025-09-18	Trump II	B-337503	DOI / BLM
2025-11-20	Trump II	B-337582	DOI
2025-12-16	Trump II	B-337604	Commerce / NTIA
2026-01-15	Trump II	B-337705	DOI / BLM
2026-01-16	Trump II	B-337673	NCUA
2026-03-24	Trump II	B-337895	US Army Corps of Engineers
2026-04-09	Trump II	B-337960	CFTC
2026-05-12	Trump II	B-337954	Treasury, IRS
2026-05-12	Trump II	B-337935	Commerce / BIS
2026-05-12	Trump II	B-337994	HHS / CMS
2026-06-04	Trump II	B-338091	Commerce
2026-07-01	Trump II	B-338157	SBA
2026-07-29	Trump II	B-338053	FCC
2026-08-17	Trump II	B-338306	DOI / BLM

Subject	Action Type
Emergency Salvage Timber Sale Program memorandum	Agency memorandum
Tongass National Forest Land and Resource Management Plan	Land/resource management plan
American Heritage River Initiative	Presidential initiative / policy
EPA interim guidance for investigating Title VI complaints	Guidance
National Charter Initiative booklet	Policy initiative
Trinity River Record of Decision (water flow/ecosystem policy)	Record of Decision
Memorandum on marketing activities by Network Directors	Agency memorandum
Memorandum terminating the Vendee Loan Program	Agency memorandum
Letter to states on State Children's Health Insurance Program (SCHIP)	Agency letter
TANF Information Memorandum (welfare-to-work waiver criteria)	Information memorandum
Interagency Guidance on Leveraged Lending (2013)	Interagency guidance
Tongass National Forest Land and Resource Mgmt Plan Amendment (2016)	Land/resource management plan
Eastern Interior Resource Management Plan (4 Alaska planning areas)	Land/resource management plan
Bulletin on Indirect Auto Lending and Compliance with ECOA (2013)	Guidance bulletin
Protecting Life in Global Health Assistance fact sheet & revised NGO provisions	Fact sheet / guidance
IRS statement on ACA health care reporting requirements	Agency statement
Sections of the Hearings, Appeals, and Litigation Law Manual (internet evidence)	Internal manual
Attorney General's April 2018 'zero tolerance' memorandum on border prosec	Agency memorandum
Secretary's memo directing a citizenship question on the 2020 Census	Agency memorandum
State Relief and Empowerment Waivers Guidance (Affordable Care Act Section	Guidance
Supervision and Regulation Letters (SR 12-7, 14-8, 15-7)	Supervisory guidance letters

Supervision and Regulation Letter 11-7 (recovery planning)	Supervisory guidance letter
Supervision and Regulation Letter 15-18	Supervisory guidance letter
Ligado Networks license modification applications	License modification
Fair Housing Act guidance on assistance animals (2020 revision)	Guidance
Requirement to wear masks on conveyances/transportation hubs	Public health order/guidance
COVID-19 workplace safety guidance for federal contractors	Guidance
2021 updates to the Thrifty Food Plan (SNAP benefit levels)	Benefit calculation update
Policy on Using Bipartisan Infrastructure Law Resources to Build a Better America	Policy statement
Memorandum on \$15/hour minimum pay for federal employees	Agency memorandum
Denial of 69 small refinery exemption petitions (Renewable Fuel Standard)	Adjudicatory denial
Student loan debt relief website & Federal Register notice	Website / notice
Reconsideration of BIL resources policy (see B-334032)	Policy statement - reconsideration
Guidance enforcing COVID-19 vaccination requirement for federal employees	Guidance
Four Notices of Funding Opportunity implementing financial assistance program	Program guidance documents / NOFOs
Policy memorandum applying Bostock v. Clayton County to discrimination complaints	Policy memorandum
October 2021 memoranda terminating the Migrant Protection Protocols	Agency memoranda
Risk Evaluation and Mitigation Strategy (REMS) revision for mifepristone 200 mg	Adjudicatory drug-safety determination
Reproductive healthcare memoranda (military health system)	Agency memoranda
Notice of Funding Opportunity, FY23-24 Multimodal Discretionary Grants	Funding notice (NOFO)
Staff Accounting Bulletin No. 121 (interpretive guidance for covered entities or	Staff guidance bulletin
ACIP recommended immunization schedule for children/adolescents	Advisory committee recommendation
Notice of Decision reinstating California's Advanced Clean Car Program CAA wa	Adjudicatory waiver decision
Fact sheet on Biden 'On-Ramp' student-loan repayment relief	Fact sheet

Cancellation of oil leases in the Arctic National Wildlife Refuge	Adjudicatory lease action
Enterprise single-family pricing framework updates	Pricing framework updates
Joint memorandum on federal contract labor practices	Joint agency memorandum
Amendments to the Sentencing Guidelines	Sentencing guideline amendments
NOFO - CHIPS Incentives Program (commercial fabrication facilities)	Funding notice (NOFO)
Order modifying/approving surrender of the Lower Klamath Project license	Licensing order
US-Japan critical minerals supply chain agreement	International agreement
RFI on draft interagency march-in rights guidance framework	Request for information (draft)
Notice to lessees/operators, Gulf of Mexico oil & gas/sulphur leases	Notice to lessees
Supervision and Regulation Letter 23-8	Supervisory guidance letter
Controller Alert CA-23-6 on 'Investing in America' emblem use	Internal agency alert
Bi-Merge credit score requirement / two new credit score models	Program requirement determination
Observations on EPA's 2025 submission of 3 CAA preemption waivers as rules	Restated waiver position
Record of Decision, Barred Owl Management Strategy	Record of Decision
Miles City Field Office RMP Amendment (coal leasing, Montana)	Land/resource management plan
North Dakota Field Office RMP	Land/resource management plan
Central Yukon RMP	Land/resource management plan
2022 National Petroleum Reserve-Alaska Integrated Activity Plan ROD	Land/resource management plan
Guidance Directive 2024-04 (Bureau of Educational and Cultural Affairs)	Guidance directive
2024 Coastal Plain Oil and Gas Leasing Program ROD	Leasing program Record of Decision (not an FLPMA RMP)
Policy on Adhering to the Text of the Administrative Procedure Act	Internal policy statement
Nonattainment findings/reclassification, 2015 Ozone NAAQS (5 Midwest states)	Adjudicatory reclassification
Decision letter on land-into-trust for the Koi Nation (Sonoma County, CA gamir	Adjudicatory land-into-trust decision

Buffalo Field Office RMP Amendment	Land/resource management plan
Decision letter on land-into-trust for the Coquille Indian Tribe (Medford, OR ga	Adjudicatory land-into-trust decision
BEAD Program restructuring policy notice	Program policy notice
Grand Staircase-Escalante National Monument RMP	Land/resource management plan
Withdrawal of fee reporting requirements	Withdrawal of requirement
Regional Supplement to Wetland Delineation Manual: Alaska Region v2.0	Technical manual
Interpretive Letter No. 25-14 (cross-border swap/futures definitions for one fir	Staff interpretive letter
Suspension of Direct File	Program suspension
Press release announcing non-enforcement and planned rescission of the AI Di	Press release
Notice implementing the Wasteful and Inappropriate Services Reduction (WISE	Program policy notice
Section 232 report on the effects of copper imports on national security	Report to the President
Policy and Procedural Notices updating citizenship and residency requirements	Policy and procedural notices
Order on Reconsideration, Protecting the Nation's Communications Systems fr	Order on reconsideration
Bears Ears National Monument Record of Decision and Approved Resource Ma	Land/resource management plan

Agency's Characterization (pre-GAO)	GAO Outcome	Decision	Notes
Not submitted; treated as internal policy m	Rule	The memorandum set the standa	Earliest opinion on record. Fo
Not submitted; RMPs traditionally treated	Rule	The plan is an agency statement c	Founding Resource-Managed
N/A (presidential action)	Not a rule	The President is not an 'agency' u	Confirmed via footnote 15 of
Agency characterized the guidance as non-	Rule	The interim guidance for investiga	Confirmed via footnote 14 of
Non-binding policy statement; sets no requ	Rule	The booklet meets the requireme	Confirmed via TANF opinion 1
Not submitted; treated as a policy-setting f	Rule	A Record of Decision can be a gen	Repeatedly cited in 2017-202
Internal agency procedure	Not a rule (exception - proce	Meets the APA rule definition but	Confirmed via TANF opinion 1
Memo related to agency management/org	Not a rule (exception - agenc	Meets the rule definition but falls	Confirmed via TANF opinion 1
General statement of policy 'announcing th	Rule	The letter was a general statement of policy, but general stater	
Non-binding guidance document' not requi	Rule	Rejected the guidance-document argument. Informal notice to	
Not a rule or a rulemaking action' and does	Rule	The Interagency Guidance is a ger	Landmark opinion reopening
Rule of 'particular applicability' limited to o	Rule	Rejected both agency arguments: the Amendment governs all r	
Resource management plan	Rule	Extended the Tongass Amendmer	Predecessor to the 2025-26 E
A "non-binding guidance document" but ar	Rule	Non-binding general statements c	Landmark opinion; the first g
Not submitted	Not a Rule - Presidential Polic	The Fact Sheet and the revised NGO standard provisions impler	
Not submitted; IRS changed only the timing	Not a rule (exception - proce	Meets the APA rule definition but	Key precedent for the 'timing
Not submitted; manual directed at SSA adj	Not a rule (exception - proce	The manual bound only SSA offici	Cited by the 2025 Miles City I
Agency organization/procedure, not subst	Not a rule (exception - proce	Agreed with DOJ: the memo redir	became a template cited in la
Merely an explanation of the Secretary's de	Not a rule (doesn't meet APA	The memo was supervisor-to-subordinate direction within a sta	
Non-binding; rescission would not alter any	Rule	The guidance is an agency statem	GAO considered this substan
Examiner guidance, non-binding on institut	Rule for SR 12-7 and 14-8; No	Whether an SR Letter is a rule tur	Cited as precedent in the 202

Non-binding examiner guidance	Rule	The letter had a substantial impact on the eight named banks e
Non-binding examiner guidance	Rule	The letter substantially affects bank behavior and is a rule
Licensing adjudication, not a rule	Not a rule (order)	Fact-intensive review and approv
The guidance 'merely restates existing law'	Rule	An early cases for the 'rules
An 'order' issued under emergency regulat	Rule	The guidance interprets Fair Housing Act case law rather than n
Not submitted	Not a rule (issuer is not an 'ag	Rejected the 'order' label because the mandate was not the pro
Exempt as an 'agency management' or ben	Rule	The Task Force is not an 'agency' under CRA because it wields n
Not submitted; guidance encouraging pref	Rule	Rejected both defenses: the benefits-matter language USDA cit
Not submitted	Not a rule (exception - agenc	The policy substantially affected f
Licensing and exemption adjudications	Not a rule (order)	Agency sought reconsiderati
Not submitted; "not a rulemaking, but a on	Rule	Meets the rule definition but falls within CRA's agency manager
Sought reconsideration of the rule finding	Rule (reconsideration)	Applying an agency interpretation
Not submitted	Not a rule (exception - agenc	Became the template cited ir
Not submitted	Rule	The debt-relief announcement, made on the agency website ar
Not submitted	Rule	On reconsideration, GAO affirmed its earlier finding that the po
Falls within CRA's procedure exception as a	Not a rule (exception - proce	Meets the rule definition but falls within CRA's agency manager
An order (licensing action), not a rule	Not a rule (order)	All four NOFOs are rules because they explain how USDA woul
Not submitted	Not a rule (exception - agenc	The memorandum is a rule: it has future effect because it direc
Not submitted	Rule	The memoranda meet the rule definition, the Supreme Court h
Not submitted	Rule	Modifying an existing drug approv
Not submitted	Not a rule (exception - agenc	Established the principle that
Not submitted	Rule	The three memoranda meet the rule definition but fall within C
Not submitted	Rule	The NOFO meets the rule definitio
Not submitted	Rule	Consistent with the NOFO-as
Not submitted	Rule	Rejected the non-agency-stateme
Not submitted	Not a rule (doesn't meet APA	Congress passed disapproval
Not submitted	Not a rule (doesn't meet APA	The recommended immunization schedule does not meet the A
Adjudicatory order specific to California's w	Not a rule (order)	The recommended immunization schedule does not meet the A
Exempt under CRA's procedure exception	Not a rule (exception - proce	Granting a state-specific statutory
		This decision became the cor
		The Fact Sheet meets the rule definition as an agency statemen

Not submitted	Not a rule (order)	Cancellation of oil leases is a licensing action and therefore an A
Not submitted	Not a rule (issuer not acting a	The updates were issued in FHFA's capacity as conservator of th
Not submitted; meets the exception for rul	Not a rule (exception - agenc	The joint memorandum directing agencies to designate labor a
Not submitted; USSC is not a federal agenc	Not a rule (issuer is not an 'ag	The Sentencing Commission, an independent commission withi
Not submitted	Rule	The NOFO is a rule because it introduces additional criteria not
Not submitted; an order	Not a rule (order)	Both modification and withdrawal of a license are licensing acti
Not submitted	Not a rule (not agency staten	The agreement is not an agency statement implementing, inter
Not submitted; RFI on a still-draft framewo	Not a rule (doesn't meet APA	A draft framework that imposes no requirements and is not fin
Not submitted	Rule	The Notice to Lessees imposing Rice's whale protective measur
Not submitted; non-binding examiner guid	Not a rule (exception - proce	Meets the rule definition but falls
Not submitted	Rule	Agency statement because OMB acted under its own authority
Not submitted	Not a rule (issuer not an 'age	The directive was issued by FHFA as conservator rather than as
Waiver notices stated CRA did not apply, tv	Not a rule (order) - GAO view	Restates the 2023 holding that the waivers are orders, issued a
Not submitted	Rule	The Record of Decision meets the rule definition and no except
Provided background facts but stated no p	Rule	Implements FLPMA by designatin
Not submitted; no position stated, noting c	Rule	Implements FLPMA by designatin
Not submitted; provided background inform	Rule	Consolidates land-use direction fo
Not submitted; provided background inform	Rule	Adopts an integrated activity plan
Not a rule; merely restates existing regulat	Not a rule (doesn't meet APA	An agency statement of future eff
Not submitted; provided factual informatio	Rule	Implements the statutory leasing
Concedes it meets the rule definition but a	Rule	Changes official policy on when the agency will use notice and c
An order or, alternatively, a rule of particul	Not a rule (order)	Applies fixed statutory criteria to certified monitoring data for i
Adjudication	Not a rule (order)	Applies the existing land-into-trus

Not submitted; provided background information	Rule	Designates subsurface federal coal estate as unavailable for future
Adjudication	Not a rule (order)	Same analysis as the Koi Nation letter: existing land-into-trust analysis
Not submitted; Commerce declined to provide	Rule	Modifies and replaces program requirements and selection criteria
Not submitted; described the FLPMA notice	Rule	A 'hybrid regulatory instrument': The most consequential opinion
Not submitted; argues the change is a Paper	Rule	A rule of agency procedure that not Principal holding of general interpretation
Not submitted; argues both the agency may	Not a rule (exception - procedure)	Meets the rule definition by interpretation GAO rejected the agency-may
Not an 'agency statement' at all, because it	Not a rule (order)	Staff-division guidance is agency action, but the letter is an adjudication
Rule of agency procedure and practice not	Not a rule (exception - procedure)	A rule, but within the exception for agency organization, procedure
Press release; not final agency action, merely	Rule	A statement of general applicability and future effect that prescribes
Guidance document; not subject to CRA	Rule	A statement of general applicability and future effect that prescribes
Report to the President; neither final agency	Not a rule (doesn't meet APA A	A statement of future effect that nonetheless does not implement
Policy and procedural notices; no legal view	Rule	Statements of general applicability and future effect implemented
Order resulting from an adjudication; rescission	Rule	Styled as an order on reconsideration While twelve opinions since 2002
Not submitted; Interior notified Congress upon	Rule	An agency statement of general applicability and future effect.

Source (GAO)	Agency Action Date	Action Administration
https://www.gao.gov/products/b-274505-1	1996-07-02	Clinton
https://www.gao.gov/products/b-275178-1	1997-05-23	Clinton
https://www.gao.gov/products/b-278224	1997-09-11	Clinton
https://www.gao.gov/products/b-281575-0	1998-02-05	Clinton
https://www.gao.gov/products/b-286338	2000-05-03	Clinton
https://www.gao.gov/products/b-287557	2000-12-01	Clinton
https://www.gao.gov/products/b-291906-0	2002-07-18	G.W. Bush
https://www.gao.gov/products/b-292045	2003-01-23	G.W. Bush
https://www.gao.gov/products/b-316048	2007-08-17	G.W. Bush
https://www.gao.gov/products/b-323772	2012-07-12	Obama
https://www.gao.gov/products/b-329272	2013-03-21	Obama
https://www.gao.gov/products/b-238859	2016-12-09	Obama
https://www.gao.gov/products/b-329065	2016-12-30	Obama
https://www.gao.gov/products/b-329129	2013-03-21	Obama
https://www.gao.gov/products/b-329206	2017-05-15	Trump I
https://www.gao.gov/products/b-329916	2017-12-01	Trump I
https://www.gao.gov/products/b-329926	2015-02-28	Obama
https://www.gao.gov/products/b-330190	2018-04-06	Trump I
https://www.gao.gov/products/b-330288	2018-03-26	Trump I
https://www.gao.gov/products/b-330811	2018-10-22	Trump I
https://www.gao.gov/products/b-330843	2012-12-17 (SR 12-7/CA 1	Obama

https://www.gao.gov/products/b-331324	2011-04-04	Obama
https://www.gao.gov/products/b-331560	2015-12-18	Obama
https://www.gao.gov/products/b-332233	2020-04-22	Trump I
https://www.gao.gov/products/b-331171	2020-01-28	Trump I
https://www.gao.gov/products/b-333501	2021-01-29	Biden
https://www.gao.gov/products/b-333725	2021-09-24	Biden
https://www.gao.gov/products/b-333732	2021-08-16	Biden
https://www.gao.gov/products/b-334032	2021-12-16	Biden
https://www.gao.gov/products/b-334221	2022-01-21	Biden
https://www.gao.gov/products/b-334400	2022-06-03	Biden
https://www.gao.gov/products/b-334644	2022-08-24	Biden
https://www.gao.gov/products/b-334032.2	2021-12-16	Biden
https://www.gao.gov/products/b-334237	2021-10-01	Biden
https://www.gao.gov/products/b-334146	2021-12-17	Biden
https://www.gao.gov/products/b-334411	2022-05-05	Biden
https://www.gao.gov/products/b-334045	2021-10-29	Biden
https://www.gao.gov/products/b-334995	2023-01-03	Biden
https://www.gao.gov/products/b-335115	2023-02-16	Biden
https://www.gao.gov/products/b-335488	2023-06-23	Biden
https://www.gao.gov/products/b-334540	2022-03-31	Biden
https://www.gao.gov/products/b-335316	2023-02-10	Biden
https://www.gao.gov/products/b-334309	2022-03-14	Biden
https://www.gao.gov/products/b-335516	2023-06-30	Biden

https://www.gao.gov/products/b-335781	2023-09-06	Biden
https://www.gao.gov/products/b-335424	2023-01-19	Biden
https://www.gao.gov/products/b-335142	2023-01-10	Biden
https://www.gao.gov/products/b-335515	2023-11-01	Biden
https://www.gao.gov/products/b-335175	2023-02-28	Biden
https://www.gao.gov/products/b-335030	2022-11-17	Biden
https://www.gao.gov/products/b-335714	2023-03-28	Biden
https://www.gao.gov/products/b-336146	2023-12-08	Biden
https://www.gao.gov/products/b-335629	2023-08-17	Biden
https://www.gao.gov/products/b-336217	2023-08-08	Biden
https://www.gao.gov/products/b-336512	2023-02-24	Biden
https://www.gao.gov/products/b-336260	2022-10-26	Biden
https://www.gao.gov/products/b-337179	2025-01-06	Biden
https://www.gao.gov/products/b-337059	2024-08-01	Biden
https://www.gao.gov/products/b-337163	2024-11-20	Biden
https://www.gao.gov/products/b-337175	2025-01-08	Biden
https://www.gao.gov/products/b-337200	2024-11-12	Biden
https://www.gao.gov/products/b-337234	2022-04-25	Biden
https://www.gao.gov/products/b-337392	2024-12-03	Biden
https://www.gao.gov/products/b-337330	2024-12-09	Biden
https://www.gao.gov/products/b-337397	2025-03-03	Trump II
https://www.gao.gov/products/b-337370	2024-12-17	Biden
https://www.gao.gov/products/b-337380	2025-01-13	Biden

https://www.gao.gov/products/b-337503	2024-11-20	Biden
https://www.gao.gov/products/b-337582	2025-01-10	Biden
https://www.gao.gov/products/b-337604	2025-06-06	Trump II
https://www.gao.gov/products/b-337705	2025-01-06	Biden
https://www.gao.gov/products/b-337673	2025-03-03	Trump II
https://www.gao.gov/products/b-337895	2007-09-01	G.W. Bush
https://www.gao.gov/products/b-337960	2025-05-21	Trump II
https://www.gao.gov/products/b-337954	2025-11-03	Trump II
https://www.gao.gov/products/b-337935	2025-05-13	Trump II
https://www.gao.gov/products/b-337994	2025-07-01	Trump II
https://www.gao.gov/products/b-338091	2025-06	Trump II
https://www.gao.gov/products/b-338157	2026-02-02	Trump II
https://www.gao.gov/products/b-338053	2025-11-21	Trump II
https://www.gao.gov/products/b-338306	2025-01-13	Biden

Action Taken During Prior Administration?	Requested By
No	Department of Agriculture (agency self-request) (Agency)
No	Sen. Frank Murkowski (Chairman, Senate Energy & Natural Resources) and Rep. Don Young (C
No	Sen. Conrad Burns (R-MT)
No	Rep. David McIntosh (Chairman, Subcommittee, House Government Reform) (R-IN)
No	Rep. James Leach (Chairman, House Banking and Financial Services) (R-IA)
Yes	Rep. Doug Ose (Chairman, Subcommittee, House Government Reform) (R-CA)
No	Rep. Ted Strickland (D-OH)
No	Rep. Lane Evans (Ranking Member, House Veterans' Affairs) (D-IL)
No	Sen. John Rockefeller (Chairman, Senate Finance Subcommittee on Health Care), Sen. Olympia
No	Sen. Orrin Hatch (Ranking Member, Senate Finance) and Rep. Dave Camp (Chairman, House W
Yes	Sen. Pat Toomey (R-PA)
Yes	Sen. Lisa Murkowski (R-AK)
Yes	Sen. Lisa Murkowski (R-AK)
Yes	Sen. Pat Toomey (R-PA)
No	Sens. Shaheen, Cardin, Blumenthal, Murray + Reps. Lowey, DeGette, Engel, Lee (D (joint))
No	Rep. Mark Meadows (Chairman, Subcommittee, House Oversight) (R-NC)
Yes	Rep. Jason Smith (R-MO)
No	Sen. Edward Markey (D-MA)
No	Sen. Brian Schatz (D-HI)
No	Sen. Ron Wyden (Ranking Member, Senate Finance) and Rep. Frank Pallone Jr. (Chairman, Hou
Yes	Sens. Tillis, Crapo, Perdue, Rounds, Cramer (R (joint))

Yes	Sen. Thom Tillis (R-NC)
Yes	Sen. Thom Tillis (R-NC)
No	Sens. James Inhofe (Chairman) and Jack Reed (Ranking Member), Senate Armed Services (Bipar
No	Rep. Steve King (R-IA)
No	Sen. Rand Paul (R-KY)
No	Sens. Sullivan, Scott, Wicker, Lee, Braun, Daines (R (joint))
No	Sen. Thom Tillis (R-NC)
No	Sen. Shelley Moore Capito (R-WV)
No	Sen. Mike Lee (R-UT)
No	Sens. Hagerty, Capito, Wicker (R (joint))
No	Chairwoman Virginia Foxx, Sens. Cassidy & Cornyn, Reps. Good & Miller-Meeks (R (joint))
No	Sen. Thomas Carper (Chairman, Senate Environment and Public Works) (D-DE)
No	Sen. Ted Cruz (R-TX)
No	Sen. Roger Marshall (Ranking Member, Subcommittee, Senate Agriculture) (R-KS)
No	Sens. Marshall, Blackburn, Barrasso, Cotton, Lankford (R (joint))
No	Sen. Bill Hagerty (R-TN)
No	Sen. Marco Rubio + 35 others (R (joint))
No	Sen. Tommy Tuberville (R-AL)
No	Sen. Ted Cruz (R-TX)
No	Sen. Cynthia Lummis (R-WY)
No	Sen. Tom Cotton (R-AR)
No	Sen. Shelley Moore Capito (R-WV)
No	Sen. Bill Cassidy, Rep. Virginia Foxx + others (R (joint))

No	Rep. Andrew Clyde + 22 others (R-House)
No	Sen. Thom Tillis + 17 others (R-Senate)
No	Sen. Bill Cassidy and Rep. Virginia Foxx (R (joint))
No	Sen. Ted Cruz (R-TX)
No	Sen. Thom Tillis (R-NC)
No	Rep. Doug LaMalfa and Rep. Cliff Bentz (R (joint))
No	Sen. Mike Crapo (R-ID)
No	Sen. Bill Cassidy (R-LA)
No	Sen. Bill Cassidy (R-LA)
No	Rep. French Hill (R-AR)
No	Sen. Ted Cruz (R-TX)
No	Sens. Rounds and Hagerty (R (joint))
Yes	Sens. Whitehouse, Padilla, Schiff (D (joint))
Yes	Sen. Cory Booker (D-NJ)
Yes	Sens. Daines, Sheehy + Reps. Downing, Zinke (R-MT (joint))
Yes	Sens. Hoeven, Cramer + Rep. Fedorchak (R-ND (joint))
Yes	Sens. Murkowski, Sullivan + Rep. Begich (R-AK (joint))
Yes	Sens. Murkowski, Sullivan + Rep. Begich (R-AK (joint))
Yes	Sen. Marsha Blackburn (R-TN)
Yes	Sens. Murkowski, Sullivan + Rep. Begich (R-AK (joint))
No	Sen. Ron Wyden, Reps. Neal, Pallone (Ranking Members) (D (joint))
Yes	Reps. Steil, Grothman, Huizenga + 7 others (R-House (joint))
Yes	Rep. Mike Thompson (D-CA)

Yes	Sens. Barrasso, Lummis (R-WY (joint))
Yes	Sens. Merkley, Wyden + Rep. Bentz (D/D/R-OR (joint))
No	Sen. Michael Bennet (D-CO)
Yes	Rep. Celeste Maloy (R-UT)
No	Sen. Elizabeth Warren (D-MA)
Yes	Rep. Nicholas Begich III (R-AK)
No	Sens. Reed, Smith, Durbin (D (joint))
No	Sen. Ron Wyden (D-OR)
No	Sen. Elizabeth Warren (D-MA)
No	Sens. Wyden, Murray, Blumenthal, Gillibrand (D (joint))
No	Sens. Kaine and Wyden (D (joint))
No	Sen. Markey (D-MA) and Rep. Velázquez (D-NY)
No	Sen. Maria Cantwell (D-WA)
Yes	Sen. Mike Lee (R-UT)

