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Comptroller General  
of the United States

Accessible Version

May 20, 2025

The Honorable Scott Turner  
U.S. Department of Housing and Urban Development  
451 7th Street, SW  
Washington, DC 20410

## Priority Open Recommendations: Department of Housing and Urban Development

Dear Secretary Turner:

Congratulations on your appointment. The purpose of this letter is to call your personal attention to two areas based on GAO's past work and nine priority recommendations, which are enclosed.<sup>1</sup> Additionally, there are 91 other GAO open recommendations that we will continue to work with your staff to address.

We are highlighting the following areas that warrant your timely and focused attention. Specifically:

**Reducing fraud risk in federal funding for disaster recovery.** Community Development Block Grant Disaster Recovery (CDBG-DR) remains vulnerable to numerous fraud risks, including grantee, contractor, and applicant fraud. In response to a historic string of U.S. natural disasters, Congress appropriated about \$39.5 billion in CDBG-DR grant funds from 2017 through 2019.

To address fraud risks, we recommended in August 2023 that the Department of Housing and Urban Development (HUD) identify ways to collect and combine contractor and subcontractor data across grantees and subrecipients to facilitate risk analyses. We also recommended that HUD develop and implement guidance for grant recipients and subrecipients to facilitate identification of contractor and cross-cutting fraud risks. By implementing these recommendations, HUD and grantees could better understand the risk environment for grants and help support the ability of grantees and subrecipients to determine contractor eligibility.

Additionally, we recommended that HUD comprehensively assess CDBG-DR for fraud risk. By doing so, HUD could better understand the wide-ranging fraud risks facing CDBG-DR and its grantees and prevent potential fraud, waste, and abuse.

**Addressing challenges in federal disaster recovery efforts.** HUD faces challenges in managing the billions of dollars used to support community recovery after natural disasters. In

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<sup>1</sup>GAO considers a recommendation to be a priority if, when implemented, it may significantly improve government operations—for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

fiscal years 2022 and 2023, we recommended that HUD develop and implement an interagency plan to identify barriers to accessing disaster recovery assistance and disparate outcomes, as well as coordinate with other federal agencies to address these issues. In addition, we recommended that HUD better manage fragmentation between its disaster recovery programs and other federal programs. Implementing these recommendations could improve service delivery to disaster survivors and communities, improve the effectiveness of recovery efforts, and reduce federal fiscal exposure.

We also recommended that HUD require CDBG-DR grantees to collect and analyze data needed to monitor the timeliness of housing activities and inform corrective actions. By doing so, HUD could better ensure that grantees identify problem areas and take corrective actions.

Please see Enclosure 1 for additional details about the status and actions needed to fully implement all nine open priority recommendations out of the 100 total recommendations that remain open. These include priority recommendations on improving data collection on homelessness and improving IT management.

We provide in Enclosure 2 additional information on HUD's recommendation implementation rate, as well as implemented, closed, and new priority recommendations since our June 2024 letter to Acting Secretary Todman. The enclosure also discusses relevant management challenges from our High-Risk list that apply to HUD. In particular, we added [Improving the Delivery of Federal Disaster Assistance](#) to our High-Risk List in February 2025. Additionally, in response to legislation enacted in December 2022, the enclosure includes information on any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.

Copies of this letter are being sent to the appropriate congressional committees. The letter will also be available on the GAO website at [Priority Recommendations | U.S. GAO](#). We also plan to send a separate letter specifically focused on open recommendations and key issues related to information technology. This letter will be sent to your Chief Information Officer.

If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Daniel Garcia-Diaz, Managing Director, Financial Markets and Community Investment, at [garciadiazd@gao.gov](mailto:garciadiazd@gao.gov). Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this letter. Our teams will continue to coordinate with your staff on addressing these priority recommendations and the remaining 91 open recommendations. I appreciate HUD's continued commitment and thank you for your personal attention to these important issues.

Sincerely,

**//SIGNED//**

Gene L. Dodaro  
Comptroller General  
of the United States

Enclosures – 2

cc: Sairah Ijaz, Chief Information Officer and Chief Artificial Intelligence Officer

## Enclosure 1

### Priority Open Recommendations to the Department of Housing and Urban Development

#### Reducing Fraud Risk in Federal Funding for Disaster Recovery

*Disaster Recovery: HUD Should Develop Data Collection Guidance to Support Analysis of Block Grant Fraud Risks.* [GAO-23-104382](#). Washington, D.C.: August 17, 2023.

#### **Year Recommendations Made:** 2023

**Recommendation:** The Assistant Secretary for Community Planning and Development should identify ways to collect and combine contractor and subcontractor data across grantees and subrecipients to facilitate risk analyses, such as by expanding the Disaster Recovery Data Portal, Disaster Recovery Grant Reporting System, or other appropriate systems.

**Actions Needed:** The Department of Housing and Urban Development (HUD) neither agreed nor disagreed with this recommendation. In its report comments, HUD stated it was taking steps to improve its fraud risk assessment and annual grantee risk analysis. As of February 2025, HUD reported it was developing a fraud risk management program with tools and templates to help guide program offices in their fraud risk management, including fraud risk assessments. Officials stated that the program would inform HUD's efforts to collect and combine contractor and subcontractor data across grantees and subrecipients to facilitate risk analysis. HUD anticipates implementing the program by December 2025.

To fully implement this recommendation, HUD must determine how to collect and use contractor and subcontractor data to facilitate risk analysis. With complete and consistent data across Community Development Block Grant Disaster Recovery (CDBG-DR) grantees and subrecipients, HUD and its grantees would be better positioned to identify eligibility and fraud risks.

**Recommendation:** The Assistant Secretary for Community Planning and Development should develop and implement guidance for CDBG-DR grantees and subrecipients to collect contractor and subcontractor data to facilitate identification of contractor and cross-cutting fraud risks through approaches such as network analysis.

**Actions Needed:** HUD disagreed with this recommendation. In its report comments, HUD stated grantees are not required to take specific actions (such as collecting contractor data) to support fraud risk management. However, HUD—which has an oversight role for both CDBG-DR and its grantees—is best positioned to use such data to identify and assess contractor and cross-cutting risks. As of February 2025, HUD reported it was developing a fraud risk management program with tools and templates to help guide program offices. Officials stated that the program would inform HUD's efforts to collect CDBG-DR contractor and subcontractor data to facilitate the identification of fraud risks. HUD anticipates implementing the program by December 2025.

To fully implement this recommendation, HUD must develop and implement guidance for its CDBG-DR grantees and subrecipients on such data collection. With these data, HUD would be able to better identify areas of increased fraud and program delivery risk.

**High Risk Area:** [Improving the Delivery of Federal Disaster Assistance](#)

**Director:** Rebecca Shea

**Contact Information:** [shear@gao.gov](mailto:shear@gao.gov)

*Disaster Recovery: HUD Should Take Additional Action to Assess Community Development Block Grant Fraud Risks.* [GAO-21-177](#). Washington, D.C.: May 5, 2021.

**Year Recommendation Made:** 2021

**Recommendation:** The Assistant Secretary for Community Planning and Development should comprehensively assess fraud risks to CDBG-DR, including identifying inherent fraud risks affecting it, assessing the likelihood and impact of inherent fraud risks, determining fraud risk tolerance, and examining the suitability of existing fraud controls. The assessment should also consider CDBG-DR's risk environment and be informed by the fraud risks identified in this report.

**Actions Needed:** HUD neither agreed nor disagreed with this recommendation. In February 2024, HUD stated it completed an agencywide Front-End Risk Assessment in September 2023, which included fraud-related questions and required HUD to identify fraud risks, assign a likelihood and impact of occurrence, rank risks, and identify mitigation steps. As of February 2025, HUD reported it was developing tools and templates to guide individual program offices in designing and implementing fraud risk management programs, including fraud risk assessments. HUD anticipates completing staff training and implementing the program by December 2025.

To fully implement this recommendation, HUD needs to complete a comprehensive assessment of CDBG-DR for fraud risks. Doing so would help HUD better understand the wide-ranging fraud risks the program faces and help prevent potential fraud, waste, and abuse.

**High Risk Area:** [Improving the Delivery of Federal Disaster Assistance](#)

**Director:** Rebecca Shea

**Contact Information:** [shear@gao.gov](mailto:shear@gao.gov)

### **Addressing Challenges in Federal Disaster Recovery Efforts**

*Disaster Recovery: Better Information Is Needed on the Progress of Block Grant Funds.* [GAO-23-105295](#). Washington, D.C.: December 15, 2022.

**Year Recommendation Made:** 2023

**Recommendation:** The HUD Assistant Secretary for Community Planning and Development should, in the event of future CDBG-DR funding, require recipients to collect and analyze data on critical milestones needed to monitor the timeliness of their housing activities and inform corrective actions, consistent with leading project management practices.

**Action Needed:** HUD neither agreed nor disagreed with this recommendation. As of February 2025, HUD officials said they had explored options for requiring grantees to collect milestone data but would need to reevaluate the agency's approach to addressing this recommendation in light of emerging changes to programs and new administration priorities. To fully implement this recommendation, HUD must require CDBG-DR recipients to maintain reliable data on critical milestones. By doing so, HUD could help grantees identify problem areas and assess the need for corrective actions to improve program efficiency.

## **High Risk Area:** [Improving the Delivery of Federal Disaster Assistance](#)

**Director:** Jill Naamane

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*Disaster Recovery: Actions Needed to Improve the Federal Approach.* [GAO-23-104956](#).

Washington, D.C.: November 15, 2022.

### **Year Recommendation Made:** 2023

**Recommendation:** The Secretary of HUD should, in consultation with the Recovery Support Function Leadership Group, identify and take steps to better manage fragmentation between its disaster recovery programs and other federal programs, including consideration of the options identified in [GAO-23-104956](#). If HUD determines that it needs authority for actions that it seeks to implement, it should request that authority from Congress.

**Action Needed:** HUD agreed with this recommendation. In January 2025, HUD issued a Universal Notice with changes intended to make the launch of recovery programs faster and more streamlined in response to a disaster. Officials stated this notice allows for better alignment and integration of HUD assistance with the Federal Emergency Management Agency (FEMA) and other federal partner assistance.

As of February 2025, HUD officials stated they were continuing to work with federal partners on the National Disaster Recovery Framework to share data to inform program and funding decisions for disaster survivor assistance. They also said they were finalizing plans to introduce a data-sharing portal to expedite data sharing with CDBG-DR grantees.

In addition, HUD officials told us they continue to work with FEMA on a Disaster Housing Pilot to help states assess housing needs prior to disasters. HUD completed the second round of the pilot and is planning to issue a report on the findings in Fall 2025.

To fully address this recommendation, HUD will need to demonstrate that it has worked with interagency partners, thoroughly considered available options, identified those it intends to implement, and taken steps to do so. Through these actions, HUD could improve service delivery to disaster survivors and communities and improve the effectiveness of recovery efforts.

## **High Risk Area:** [Improving the Delivery of Federal Disaster Assistance](#)

**Director:** Chris P. Currie

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*Disaster Recovery: Additional Actions Needed to Identify and Address Potential Recovery Barriers.* [GAO-22-104039](#). Washington, D.C.: December 15, 2021.

### **Year Recommendations Made:** 2022

**Recommendation:** The HUD Assistant Secretary for Community Planning and Development should, in coordination with the FEMA Administrator and the Small Business Administration (SBA), develop, with input from key recovery partners, and implement an interagency plan to help ensure the availability and use of quality information that includes (1) information requirements, (2) data sources and methods, and (3) strategies for overcoming information

challenges to support federal agencies involved in disaster recovery in identifying access barriers or disparate outcomes.

**Action Needed:** HUD neither agreed nor disagreed with this recommendation. In February 2024, HUD officials told us that HUD, FEMA, and SBA were developing an interagency plan for data collection, sharing, and analysis to identify potential equity issues, with completion anticipated by June 2024. As of February 2025, HUD officials told us that the incoming administration was reviewing the plan and considering how to move forward with federal partners.

To fully address the recommendation, HUD, in coordination with FEMA and SBA, will need to develop and implement an interagency plan that specifies the data needed, as well as the sources and methods for obtaining the data. By working together, the federal agencies with large recovery programs would have opportunities to devise workable approaches to solve information challenges and ensure that disaster survivors have equal opportunity to access recovery programs.

**Recommendation:** The HUD Assistant Secretary for Community Planning and Development should coordinate with the FEMA Administrator and SBA to design and establish routine processes to be used within and across federal disaster recovery programs to address identified access barriers and disparate outcomes on an ongoing basis.

**Action Needed:** HUD neither agreed nor disagreed with this recommendation. In December 2022, HUD officials told us they introduced a new fair housing and civil rights assessment and a pilot dashboard designed to help officials understand the demographics of disaster survivors who benefit from CDBG-DR funds. In February 2024, HUD officials told us they were working on an interagency plan that would describe routine processes used to address any equity issues identified. HUD also established an Equity Team in its Office of Disaster Recovery to expand data collection, evaluate CDBG-DR implementation processes and identify improvements, provide technical assistance to grantees, and evaluate quarterly performance reports, according to HUD officials. As of February 2025, HUD officials told us that the incoming administration was reviewing the interagency plan and considering how to move forward with federal partners.

To fully implement this recommendation, HUD must complete its effort to implement processes for use across federal recovery programs to address identified access barriers and disparate outcomes on an ongoing basis. Doing so would provide these programs with a mechanism to address potential access barriers or disparate outcomes, particularly those arising from interactions between programs.

#### **High Risk Area:** [Improving the Delivery of Federal Disaster Assistance](#)

**Director:** Chris P. Currie

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#### **Improving Data Collection on Homelessness**

*Homelessness: Better HUD Oversight of Data Collection Could Improve Estimates of Homeless Population.* [GAO-20-433](#). Washington, D.C.: July 14, 2020.

**Year Recommendations Made:** 2020



**Recommendation:** HUD's Office of Special Needs Assistance Programs should assess and enhance the usefulness of its assistance to Continuums of Care's (CoC) data collection efforts.

**Action Needed:** HUD agreed with this recommendation. In March 2023, HUD officials told us they were developing an outreach strategy to discuss count methodologies with CoCs, answer questions, and determine if additional guidance or assistance was needed. In February 2024, HUD developed a random sample of CoCs for one-on-one outreach and assistance. HUD's Office of Special Needs and Assistance Programs also consulted with CoCs seeking additional guidance or clarification on count methodologies. Additionally, officials told us they intended to assess their outreach efforts but that resource constraints limited their ability to fully implement this effort. As of February 2025, HUD officials stated they were facing various operational challenges and, at the time, were unable to provide further updates.

To fully implement this recommendation, HUD needs to evaluate the effectiveness of its assistance to CoCs. Doing so would enable HUD to further improve the quality of information collected.

**Director:** Alicia Puente Cackley

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### **Improving IT Management**

*Information Technology: HUD Can Take Additional Actions to Improve Its Governance.* [GAO-15-56](#). Washington, D.C.: December 10, 2014.

**Year Recommendation Made:** 2015

**Recommendation:** To establish an enterprise-wide view of cost savings and operational efficiencies generated by investments and governance processes, the Secretary of Housing and Urban Development should direct the Deputy Secretary and Chief Information Officer to place a higher priority on identifying governance-related cost savings and efficiencies and establish and institutionalize a process for identifying and tracking comprehensive, high-quality data on savings and efficiencies resulting from IT investments and the IT governance process.

**Action Needed:** HUD agreed with this recommendation. HUD's Office of the Chief Information Officer has refined its IT investment selection processes by establishing a business needs portal, maturing the practices for evaluating business needs, and requiring cost-benefit analyses for proposed investments. In addition, the office strengthened its cost estimation practices by implementing a new cost estimating process and applying Technology Business Management to analyze IT cost data.

HUD has evaluated the potential for its new tools and practices through the annual budget formulation process to determine whether investments are expected to generate cost savings or operational efficiencies. However, as of February 2025, it had not yet fully implemented the new practices or established guidance for identifying and tracking cost savings for IT investments or governance processes. HUD stated that it plans to develop such guidance by September 2025.

To fully implement this recommendation, HUD needs to complete its planned work and establish guidance supporting a repeatable, enterprise-wide process for tracking IT-related cost savings and operational efficiencies, including those related to governance decisions. Doing so would improve HUD's ability to monitor the outcomes of its IT governance activities.

**High-Risk Area:** [Improving IT Acquisitions and Management](#)

**Director:** Kevin Walsh

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## Enclosure 2

### Key Information About the Status of GAO Recommendations and Improving Agency Operations

#### Department of Housing and Urban Development's (HUD) Recommendation Implementation Rate

In November 2024, we reported that, on a government-wide basis, 70 percent of our recommendations made 4 years ago were implemented.<sup>2</sup> HUD's recommendation implementation rate was 93 percent. As of May 2025, HUD had 100 open recommendations.

#### Implemented, Closed, and New Priority Recommendations

Our June 2024 letter to Acting Secretary Todman identified 11 priority recommendations.<sup>3</sup> Since then, HUD has implemented two of our 11 open priority recommendations, and we did not add any new priority recommendations.

**Implemented recommendations:** In September 2024, HUD implemented quality assurance checks of Continuums of Care's (CoC) Point-in-Time count methodology data. Specifically, HUD evaluates CoCs' data methodology submissions for year-over-year variations and checks whether any validation flags are triggered. These efforts help ensure that HUD's data collection, management, and reporting standards for the Point-in-Time count are being met.<sup>4</sup>

In addition, to ensure compliance with federal privacy requirements and to safeguard personal information collected, HUD developed a privacy risk strategic framework and promulgated it department-wide in a March 2025 memo from its Chief Privacy Officer. The memo notes that the strategic framework serves as HUD's privacy risk management strategy. Among other things, the framework includes a discussion of HUD's privacy risk appetite, strategies for addressing identified privacy risks, an approach to scoring risks, and risk tolerance indicators for identified risks. By taking these steps, HUD will have greater assurance that it is managing privacy risks within acceptable thresholds.<sup>5</sup>

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<sup>2</sup>GAO, [Performance and Accountability Report: Fiscal Year 2024](#) (Washington, D.C.: Nov. 15, 2024).

<sup>3</sup>GAO, *Priority Open Recommendations: Department of Housing and Urban Development*, [GAO-24-107284](#) (Washington, D.C.: June 3, 2024).

<sup>4</sup>GAO, *Homelessness: Better HUD Oversight of Data Collection Could Improve Estimates of Homeless Population*, [GAO-20-433](#) (Washington, D.C.: July 14, 2020).

<sup>5</sup>GAO, *Privacy: Dedicated Leadership Can Improve Programs and Address Challenges*, [GAO-22-105065](#) (Washington, D.C.: Sept. 22, 2022).

## High-Risk List

In February 2025, we issued our biennial update to our High-Risk List.<sup>6</sup> This list identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement. It also identifies the need for transformation to address economy, efficiency, or effectiveness challenges. Two of our high-risk areas relate directly to HUD. The first of these is [resolving the federal role in housing finance](#). More specifically, the amount of mortgage-backed securities in the Government National Mortgage Association's (Ginnie Mae) portfolio expanded to nearly \$2.7 trillion in 2024—exposing it, and the federal government, to a greater risk of loss. The second high-risk area is [improving the delivery of disaster assistance](#), as HUD-administered grants are a key part of the nation's disaster recovery efforts.

Several other government-wide high-risk areas also have direct implications for HUD and its operations. These include [improving IT acquisitions and management](#), [improving strategic human capital management](#), [improving the personnel security clearance process](#), [managing federal real property](#), and [ensuring the cybersecurity of the nation](#).

In addition to HUD's high-risk areas, we urge your attention to resolving these other government-wide high-risk issues as they relate to HUD. For example, regarding cybersecurity, our 2025 High-Risk List identifies a need to strengthen protections for federal systems and information. One such protection includes federal agencies fully implementing incident response requirements, such as event logging requirements under the Office of Budget and Management (OMB) guidance.<sup>7</sup> Doing so would help ensure the federal government's ability to fully detect, investigate, and remediate cyber threats.

The High-Risk List also identifies areas requiring significant attention, including estimating improper payments. Reducing improper payments is critical to safeguarding federal funds and could help achieve cost savings and improve the government's fiscal position. Executive branch agencies reported improper payment estimates totaling \$162 billion for fiscal year 2024. The \$162 billion total for fiscal year 2024 does not include estimates of certain risk-susceptible programs. For example, HUD's Tenant-Based Rental Assistance program did not have an estimate of improper payments for fiscal year 2024.<sup>8</sup>

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<sup>6</sup>GAO, *High-Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, [GAO-25-107743](#) (Washington, D.C.: Feb. 25, 2025).

<sup>7</sup>The Federal Information Security Modernization Act of 2014 provides for Inspectors General to conduct an annual independent evaluation to determine the effectiveness of an agency's information security program and practices. 44 U.S.C. § 3555(b). HUD's Office of Inspector General reported in its fiscal year 2024 evaluation that HUD had not yet met the event-logging requirements in accordance with OMB Memorandum M-21-31. Department of Housing and Urban Development, Office of Inspector General, *HUD Fiscal Year 2024 Federal Information Security Modernization Act of 2014 Evaluation Report*, 2024-OE-0002 (Washington, D.C.: Oct. 29, 2024); and OMB, *Improving the Federal Government's Investigative and Remediation Capabilities Related to Cybersecurity Incidents*, M-21-31 (Washington, D.C.: Aug. 27, 2021). In December 2023, we recommended that HUD fully implement all event logging requirements as directed by OMB guidance. GAO, *Cybersecurity: Federal Agencies Made Progress, but Need to Fully Implement Incident Response Requirements*, [GAO-24-105658](#) (Washington, D.C.: Dec. 4, 2023).

<sup>8</sup>In May 2024, HUD's Office of Inspector General reported that lack of proper planning and coordination from leadership in program and support offices prevented HUD from addressing the root causes behind the failure to report improper payment estimates for the Tenant-Based Rental Assistance program. According to HUD's Office of the Chief Financial Officer, HUD may not be able to produce a compliant estimate until fiscal year 2027. Department of Housing and Urban Development, Office of Inspector General, *HUD Did Not Comply With the Payment Integrity Information Act of 2019*, 2024-FO-0006 (Washington, D.C.: May 17, 2024).

Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, OMB, and the leadership and staff in agencies, including within HUD. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.<sup>9</sup>

### **Congress's Role on GAO Recommendations**

We also recognize the key role Congress plays in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 includes a provision for GAO to identify any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.<sup>10</sup>

Congress can use various strategies to address our recommendations, such as incorporating them into legislation. Congress can also use its budget, appropriations, and oversight processes to incentivize executive branch agencies to act on our recommendations and monitor their progress. For example, Congress can hold hearings focused on HUD's progress in implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for agencies to act. Moreover, Congress can follow up during the appropriations process and request periodic updates.

Congress also plays a key role in addressing any underlying issues related to the implementation of these recommendations. For example, Congress can pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.

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<sup>9</sup>GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, [GAO-22-105184](#) (Washington, D.C.: Mar. 3, 2022).

<sup>10</sup>James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 7211(a)(2), 136 Stat. 2395, 3668 (2022); H.R. Rep. No. 117-389 (2022) (accompanying Legislative Branch Appropriations Act, 2023, H.R. 8237, 117th Cong. (2022)).