



U.S. Government Accountability Office

PRESIDENTIAL DRAWDOWN AUTHORITY: Guidance Should Reflect Expanded Use

GAO-25-107475

Q&A Report to Congressional Committees

May 15, 2025

Why This Matters

Since fiscal year 2022, the President, with special authority from Congress, has greatly expanded the use of Presidential Drawdown Authority (PDA) to provide ammunition, missiles, and other defense articles from Department of Defense (DOD) inventories to foreign partners—especially Ukraine. Authorized under the Foreign Assistance Act of 1961, as amended (FAA), PDA allows the President to respond to U.S. foreign policy and national security objectives by providing assistance that flows from existing resources and up to a ceiling established in law without first seeking additional legislative authority or appropriations from Congress. The President may provide this assistance by ordering the “drawdown” of articles and services from the inventories and resources of U.S. government agencies, primarily DOD. According to Department of State officials, the President delegated to the Secretary of State the authority to direct DOD to execute PDA packages. DOD’s Defense Security Cooperation Agency (DSCA) administers and provides guidance for PDA.

From December 2021 through January 2025, the President authorized about \$31.7 billion in defense articles to Ukraine under PDA. Since 1961, presidents have used PDA numerous times, but the value, volume, and frequency of PDA use for Ukraine since Russia’s 2022 invasion is unprecedented. From fiscal years 2022 to 2024, Congress used its authority to raise the yearly ceiling for PDA by billions of dollars. DOD also developed processes to manage the more than \$45.8 billion Congress appropriated to replace defense articles provided under PDA to Ukraine. The replacement funding was a part of the five Ukraine supplemental appropriation acts, which provided about \$174.2 billion that agencies have allocated for various purposes, including to help combat Russian aggression and to preserve Ukraine’s territorial integrity.

These adjustments raised questions for DOD as officials worked to quickly transfer a large volume of defense articles. To improve implementation of DOD’s defense article transfer process in Ukraine, we previously made recommendations including that DOD improve the accuracy of defense article delivery data and evaluate its end-use monitoring approach.

This report is one of several engagements we initiated in response to a provision included in the Consolidated Appropriations, 2023. In addition, a House Report accompanying the Department of Defense Appropriations Bill, 2024, includes a provision for us to review DOD’s execution of PDA and related funding and notifications since February 24, 2022.

Key Takeaways

- As of January 31, 2025, there was approximately \$6 billion in remaining PDA authority that DOD has said it could use to provide additional defense articles to Ukraine.
- DOD and State are generally following DSCA guidance for developing PDA packages. However, DOD has not conducted Operations and Maintenance (O&M) budget impact assessments, as DSCA guidance calls for. In addition, the military services have not yet implemented our 2016 recommendation to develop guidance on conducting such assessments.
- Failure to fully identify the O&M budget impacts of providing equipment in PDA packages may limit the services’ available resources to complete previously planned activities.
- DOD has not updated its guidance to describe how it should consider replacement needs for equipment provided to Ukraine under PDA and thus may face greater-than-anticipated risks to strategic readiness. We recommend that the Secretary of Defense ensure that PDA guidance addresses how replacement needs should be considered when developing PDA packages.

What is Presidential Drawdown Authority?

The FAA authorizes the President to direct the drawdown of articles and services from the inventory and resources of U.S. government agencies to support foreign partners and international organizations in emergency and nonemergency situations.¹ The President has used this authority to provide defense articles to Ukraine, Taiwan, and Haiti since fiscal year 2022.² The FAA establishes a ceiling on the annual total value of Presidential drawdowns under four different authorities (see table 1).

Table 1: Permanent Presidential Drawdown Authorities in the Foreign Assistance Act of 1961, as Amended		
Presidential Drawdown Authority	Purpose	Maximum Ceiling Value per Fiscal Year
Section 506(a)(1)	To provide defense articles from the stocks of the Department of Defense (DOD), defense services of DOD, and military education and training in the event of an unforeseen emergency that requires immediate military assistance to a foreign country or international organization.	\$100 million
Section 506(a)(2)	To provide articles and services from the inventory and resources of any U.S. agency for international narcotics control assistance, disaster assistance, anti-terrorism assistance, nonproliferation assistance, and migration and refugee assistance, if it is in the national interest of the U.S.	\$200 million with not more than \$75 million provided from the inventory of DOD
Section 506(a)(3)	To provide defense articles from the stocks of DOD, defense services of DOD, and military education and training to Taiwan.	\$1 billion
Section 552(c)(2)	To provide commodities and services from the inventory and resources of any agency of the U.S. government for the purpose of peacekeeping operations, as the result of an unforeseen emergency.	\$25 million with an additional \$25 million authorized for necessary and immediate assistance to Taiwan

Source: GAO analysis. | GAO-25-107475
Note: See 22 U.S.C. §§ 2318 and 2348a(c).

All drawdowns require congressional notification. Before executing a drawdown under Section 506(a)(1) of the FAA, the President must determine and report to Congress that an unforeseen emergency exists, requiring immediate military or other assistance to a foreign partner or international organization that cannot be provided under any other law.³ Before executing a drawdown under Section 506(a)(2) of the FAA, the President must determine and report to Congress that it is in the U.S. national interest to do so. Drawdowns under Section 552(c) require a presidential determination that an unforeseen emergency requires the immediate provision of assistance. Agencies identify appropriate articles to be sent, source those articles from U.S. agencies, and, following the President's determination and congressional notification, deliver them to recipients.

What is the value of PDA assistance authorized and approved for provision to Ukraine since fiscal year 2022?

In a span of about 3 years—from December 2021 through January 2025—Congress raised the ceiling for PDA, and the President authorized the drawdown of about \$31.7 billion of defense articles, such as ammunition and missiles, to Ukraine.⁴ Over the 60 years prior, from September 1961 to September 2021, the President had authorized about \$3.5 billion of assistance under PDA for all partners globally (about \$9.3 billion when adjusted for inflation to fiscal year 2023 constant dollars).

After Russia's full-scale invasion of Ukraine in February 2022, Congress raised the maximum aggregate value for the applicable FAA authorities:

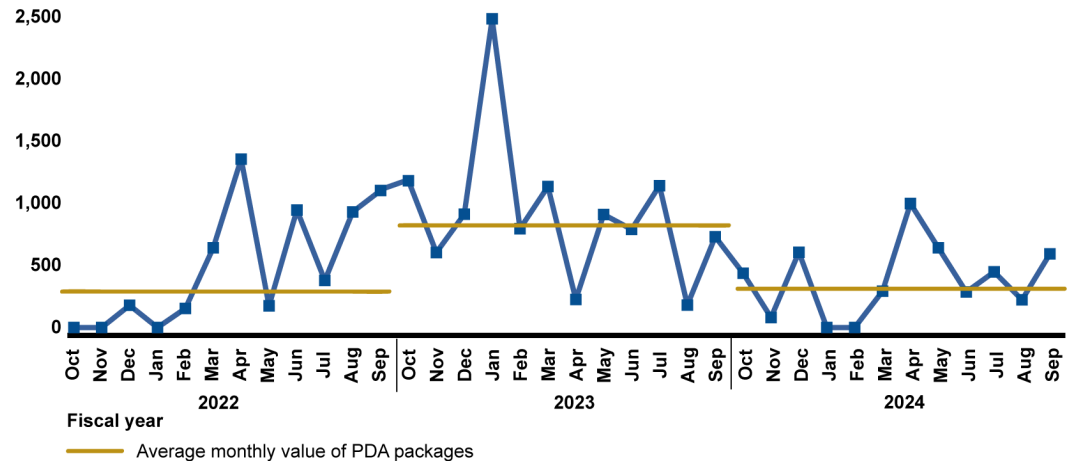
- For Section 506(a)(1), from \$100 million per fiscal year to \$11 billion for fiscal year 2022, \$14.5 billion for fiscal year 2023, and \$7.8 billion for fiscal year 2024.
- For Section 506(a)(2), from \$200 million to \$400 million for fiscal years 2023 and 2024.⁵
- For Section 552(c)(2), from \$25 million to \$100 million for fiscal year 2022 and from \$25 million to \$50 million for fiscal years 2023 and 2024.⁶

According to Defense Security Cooperation Agency (DSCA) data, of the approximately \$31.7 billion authorized by the President, DOD had ordered the provision of an estimated \$25.7 billion in defense articles for Ukraine, as of January 31, 2025. This leaves approximately \$6 billion in estimated authority that DOD can use to provide defense articles and services to the country, according to DOD.⁷ DSCA guidance states that drawdowns end when the value of the presidential determination is exhausted or the U.S. response to the emergency ends.⁸ DSCA tracks the overall usage of each presidential determination to ensure the authorization ceiling is not exceeded.

On average, the President approved drawdown packages with an estimated average value of almost \$599 million for Ukraine each month from fiscal years 2022 to 2024. However, the average value of drawdown packages has fluctuated each year since the beginning of the conflict, with fiscal year 2024 averaging the lowest (see fig. 1).⁹

Figure 1: Estimated Monthly Value of Presidential Drawdown Authority (PDA) Packages to Ukraine, Fiscal Years 2022-2024

Estimated Dollar Value (in billions)



Source: GAO analysis of Defense Security Cooperation Agency data. | GAO-25-107475

Note: In this graphic, "average" refers to the arithmetic mean. According to Department of Defense officials, the value of PDA packages are estimates and subject to change until packages are delivered. Equipment approved to be provided to Ukraine may be delivered months after initial approval. The aggregate and average monthly values of drawdowns presented are estimates as of January 31, 2025, according to data provided by DSCA.

How has the U.S. used PDA to assist other partners since fiscal year 2022?

Since fiscal year 2022, the President also used PDA to provide more than a billion dollars in assistance to Taiwan and Haiti. First for Taiwan, from July 2023 through December 2024, the President authorized three packages of military assistance totaling about \$1.48 billion. DOD subsequently used that authority to approve the provision of about \$1.41 billion in defense articles to Taiwan.

Additionally, the President used PDA to authorize two packages to Haiti in March and April 2024 for anti-crime and counternarcotics assistance, totaling \$70 million. According to officials, multiple U.S. government agencies provided equipment for the two drawdowns to Haiti, including DOD, the Department of Homeland Security (DHS), State, and the U.S. Agency for International Development. For example, the first package to Haiti was authorized for \$10 million, the majority of which was provided by DHS to support the Haitian National Police, according to State officials.

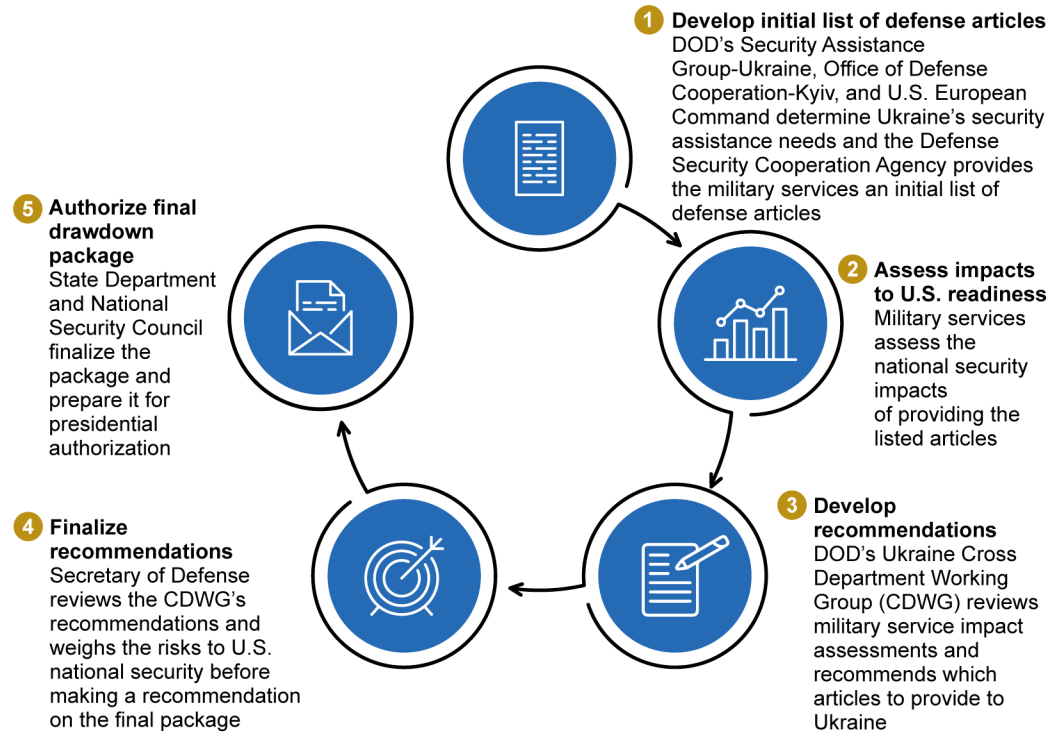
The second package was authorized for \$60 million, of which DOD was given \$57 million in authority to support the United Nations Multinational Security Support Mission (MSS) in Haiti. As of September 2024, DOD had approved the provision of about \$45.5 million in equipment to support the Haitian National Police and MSS and had about \$12.5 million in remaining authority, according to DOD data.

What is DOD's process for executing drawdowns?

In 2022, DOD created the Cross Department Working Group (CDWG) in part to consider each of Ukraine's requests for military assistance, including through PDA. When preparing packages of defense articles and services to provide to Ukraine using PDA, the CDWG determines how best to fulfill Ukraine's requests for assistance. Officials use data from the relevant military services, such as the Army, to determine whether requested defense articles are available. The CDWG then assesses how a transfer of defense articles would affect the readiness of U.S. forces, which includes consideration of the estimated costs and timelines for replacing the defense articles proposed for transfer. The State Department and

National Security Council finalize the package and prepare it for Presidential Authorization (see fig. 2).

Figure 2: Department of Defense (DOD) Process for Authorizing Assistance under Presidential Drawdown Authority to Ukraine



Source: GAO analysis of Department of Defense information. | GAO-25-107475

DOD used the CDWG process it developed for Ukraine to inform the process used for drawdowns made to Taiwan and Haiti in 2023 and 2024. According to officials, DOD created the Senior Integration Group-Taiwan, which they modeled on the CDWG, to facilitate, among other things, the approval of drawdowns to Taiwan. According to DOD officials, DOD did not establish a formal working group to facilitate the drawdowns to Haiti but modeled the approval process on the process used for Ukraine.

Once the President authorizes the final package and DOD approves equipment for provision, DOD directs the services to begin aggregating and transporting defense articles to partners.¹⁰ In some cases, these articles may begin arriving to partners within days of approval, but others could take months to arrive.¹¹

To what extent have State and DOD followed DSCA guidance for managing drawdowns?

We found that State and DOD were generally following DSCA guidance on the process for developing PDA packages. However, DOD has not conducted Operations and Maintenance (O&M) budget impact assessments of proposed PDA packages.¹² These assessments have previously identified the adverse impact of diverting O&M funds from other activities to support drawdowns. Preparing these assessments is one of several actions identified in DSCA's guidance in its *Security Assistance Management Manual* (SAMM).¹³ Table 2 presents our analysis of whether State and DOD documented key actions while developing 21 fiscal year 2024 PDA packages.

Table 2: Department of State and Department of Defense (DOD) Documentation of Key Actions in Developing 21 Fiscal Year 2024 Presidential Drawdown Packages.

Key Actions	Explanation	Documented
State		
Presidential Determination	President signs—or delegates to the Secretary of State to sign—a Presidential Determination directing the drawdown under the applicable section(s) of the Foreign Assistance Act of 1961, as amended (FAA), up to a specified dollar value.	Yes
Justification memo	State prepares a memo, required by the FAA, stating the reasons why the assistance provided under applicable provisions of the FAA is justified, such as an unforeseen emergency, and the amount of the intended assistance.	Yes
Congressional notification	The FAA requires that State provide written prior notice to Congress of intent to exercise each drawdown.	Yes
DOD		
Strategic Readiness Impact Assessment	Defense Security Cooperation Agency (DSCA) tasks the military services to provide strategic readiness impact assessments to enable DOD stakeholders to recommend which articles and services to include in drawdown packages.	Yes
Operations and Maintenance (O&M) Budget Impact Assessment	DSCA tasks the military services to provide an O&M budget impact assessment for all available defense articles and services that may be drawn from DOD inventory.	No
Execute Order	DSCA prepares and issues the Execution Order identifying the articles, services, and training that may be provided under the drawdown.	Yes

Source: GAO analysis of State and DOD information. | GAO-25-107475

Note: Key actions in the process of developing PDA packages are identified in the DSCA Security Assistance Management Manual.

DOD officials told us they were unaware that O&M budget impact assessments were required as part of the process for developing PDA packages as well as the form these should take. They also stated that these budget assessments were not necessary for Ukraine drawdowns because Congress appropriated funding to cover the cost of providing and replacing equipment in PDA packages to Ukraine. Normally, the services are not reimbursed for the defense articles provided or for the associated costs of drawdowns, according to DOD officials. DSCA guidance in the SAMM does not address whether these assessments are needed when Congress appropriates replacement funding.

In 2016, we reported that DOD did not conduct assessments of the potential impact of planned PDA packages on O&M budgets.¹⁴ We recommended that the Secretaries of the military departments develop guidance that assigns responsibility for the preparation of O&M budget impact assessments and includes direction on how such assessments should be conducted as part of drawdown planning. However, the military services have not yet implemented this recommendation.

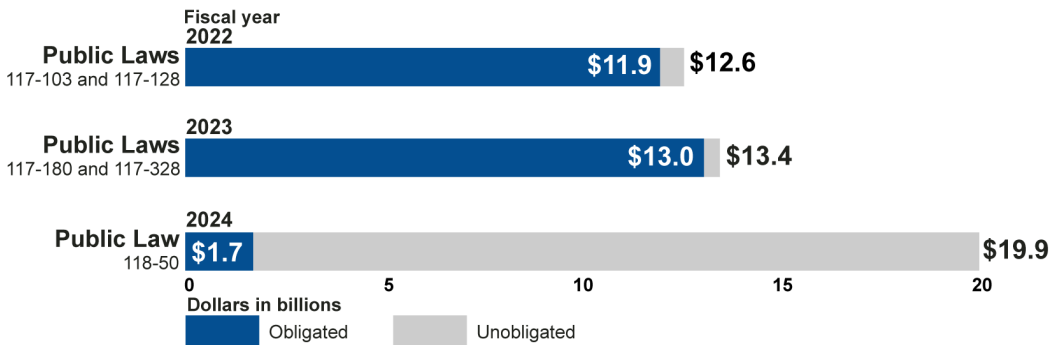
Without guidance clarifying how and when to conduct O&M budget assessments, DOD officials could make decisions without potentially important information. For example, failure to fully identify the O&M budget impacts on the military services of providing equipment through PDA packages may limit available resources to complete other previously planned activities.

How has DOD used appropriated funding to replace the equipment provided to Ukraine?

In 2023, DOD established a monthly process for the services to request and receive funding from the Office of the Secretary of Defense to replace defense articles transferred to Ukraine. According to DOD officials, the services are largely responsible for determining what they want to replace. On a monthly basis, the services can submit requests to officials in the Offices of the Under Secretary of Defense (Comptroller) and the Under Secretary of Defense for Acquisition and Sustainment. Once requests are approved, the Comptroller transfers funds to the services' procurement accounts to support defense article replacement or to operations and maintenance accounts to reimburse logistics expenses.

Since the start of Russia's 2022 invasion of Ukraine, as of March 10, 2025, Congress had appropriated \$45.8 billion dollars in supplemental appropriations for DOD to replace defense articles provided to Ukraine under PDA with the same or newer variants (see fig. 3).¹⁵

Figure 3: Status of Obligations of Funds by Year of Supplemental Appropriation for Replacement of Defense Articles Sent to Ukraine as of November 2024 (dollars in billions)



Source: GAO analysis of Department of Defense Comptroller data, as of November 12, 2024. | GAO-25-107475
Note: Numbers may not sum due to rounding. Funds for weapon replacement were appropriated for or transferred to multiple Operations & Maintenance and Procurement appropriation accounts for the Department of Defense and the military services, with varying periods of availability for obligation.

According to DOD officials, as of February 2025, DOD had planned to obligate all remaining replacement funding and would require an additional appropriation to replace defense articles and services previously included in drawdown packages for Ukraine. Specifically, agency officials stated that, as of November 2024, DOD would likely require at least \$28 billion in additional funding for replacement and noted that number could increase if additional drawdowns take place.

How has DOD considered replacement during PDA package development and what guidance is in place to do so?

DOD officials said they consider the military services' replacement needs when choosing defense articles to drawdown, but we found that DOD has not provided guidance for this process. The primary type of PDA is an emergency authority that does not traditionally contain funding to replace defense articles drawn down from DOD inventory. DOD does not replace defense articles provided to partners under PDA unless Congress appropriates funds to do so. For example, as discussed above, since the start of Russia's 2022 invasion of Ukraine, Congress has appropriated \$45.8 billion dollars for DOD to replace defense articles provided to Ukraine under PDA.¹⁶

The CDWG considers the services' strategic readiness impact assessments describing the immediate and long-term risks associated with the proposed donation of specific defense articles through PDA. Specifically, according to DOD officials, beginning with PDA packages approved in late September 2023, the CDWG factored the need for and availability of replacement funds into its assessment of strategic readiness risks, although DSCA guidance did not specifically call for doing so. However, before September 2023, DOD may have approved the provision of equipment to Ukraine without considering the need to replace it.

As such, DOD has faced funding challenges that have affected efforts to replace defense articles provided to Ukraine using PDA. For instance, in January 2024, DOD officials told us that they planned to obligate almost all \$25.9 billion available to replace a portion of defense articles provided through drawdowns and Congress had not approved additional supplemental funding for remaining replacement needs. At that time, DOD officials estimated that they needed approximately \$13 billion more to replace equipment already provided. In response to this shortage, DOD paused the approval of additional PDA packages until additional funding was approved by Congress.

As replacement funding has not traditionally been provided, guidance such as the SAMM does not address how DOD officials should account for the potential to replace defense articles provided through PDA. According to *Standards for Internal Control in the Federal Government*, management should implement control activities through policies, including documentation of responsibilities and appropriate documentation of internal control.¹⁷ As of November 2024, DOD had not documented internal controls regarding how officials should consider replacement of defense articles before they are provided under PDA. For example, officials were unaware of any policy or guidance that provided instruction on how, if at all, the availability of replacement funds should be considered while developing PDA packages.

According to a DOD official from the Office of the Under Secretary of Defense (OUSD) for Personnel and Readiness (P&R), DOD is compiling lessons learned from the use of drawdowns for Ukraine over the past two years to develop a new DOD instruction. The official told us that the new instruction is separate from the SAMM and is intended to clarify the process for conducting strategic readiness impact assessments across the services. Further, DOD intends for it to define the roles and responsibilities of stakeholders in the development of PDA packages, including the roles of OUSD components, the Joint Staff, services, and combatant commands. DOD officials stated that this additional guidance may also address how DOD officials should assess replacement risks when DOD is preparing PDA packages. As of January 2025, the instruction was still in draft and expected to be released by the middle of 2025.

Without such additional guidance, the services may not be in a position to identify and mitigate risks associated with providing large volumes of defense articles from DOD inventory to partners under PDA. For instance, without guidance to ensure that DOD officials consider whether replacement funds are available or necessary to mitigate unacceptable levels of readiness risk, DOD may face greater than anticipated readiness impact. As DOD develops its new instruction, it has the opportunity to ensure that the guidance addresses how officials should consider replacement of defense articles before they are drawn down.

Conclusions

Since fiscal year 2022, the President and Congress have substantially increased the use of PDA to provide defense articles and services to foreign partners. Considering the volume of defense articles recently provided under PDA and limited replacement funding, the United States may risk providing defense articles to partners that cannot be replaced in a timely manner. However, DOD has not taken steps to ensure that guidance addresses the additional risk of drawing down such a significant volume of services' stocks. For example, new guidance DOD is developing could help ensure that DOD is accounting for the expanded use of PDA and the availability of funds to replace DOD inventory. Without making such adjustments, stakeholders, including the President, may not have the facts needed to make fully informed decisions about how much or which equipment to provide to foreign partners through PDA.

Recommendation for Executive Action

The Secretary of Defense should direct the Comptroller, DSCA, and OUSD (P&R) to ensure PDA guidance addresses how replacement needs should be considered when developing PDA packages.

Agency Comments

We provided a draft of the report to DOD and State for comment. State provided no formal comment while DOD's comments on the report are reprinted at the end of this report. In its comments, DOD partially concurred with our recommendation, agreeing that it would be beneficial to ensure PDA guidance addresses how replacement needs should be considered when developing presidential drawdown packages. However, DOD believes ongoing efforts by OUSD (P&R)—rather than DSCA or Comptroller—may address the recommendation. In particular, the response noted that OUSD (P&R) is drafting a DOD instruction to clarify guidance on how to conduct readiness impact assessments, including how DOD officials should assess replacement risks.

We acknowledge that multiple DOD elements are involved in executing drawdowns. One option for providing this guidance would be through the DOD instruction under development. DSCA and the Comptroller coordinate the use of PDA and weapons replacement efforts, respectively, and therefore will have key roles in ensuring that the guidance is updated as we recommended. Given DOD's response, we amended our draft recommendation to include OUSD (P&R), as well as DSCA and the Comptroller.

How GAO Did This Study

To determine the status of authorized PDA use for Ukraine and other partners since fiscal year 2022, we reviewed documents and interviewed DOD and State officials. We reviewed notices published in the Federal Register to determine the total amount of assistance authorized to be provided under PDA to Ukraine and other partners. To determine the total value of assistance approved for provision to Ukraine by DOD, we reviewed DOD data on the value of each drawdown package to Ukraine as of January 2025. We determined the data were reliable for the purposes of describing the value of assistance provided to Ukraine using PDA. To determine the amount of assistance approved for provision to other partners since fiscal year 2022, we interviewed DOD and State officials and reviewed agency documentation. We also reviewed guidance and interviewed officials from DOD and State to gain an understanding of their roles and responsibilities for managing drawdowns.

To determine the extent to which State and DOD followed guidance for developing drawdown packages, we reviewed DSCA's *Security Assistance Management Manual*. We identified key steps in the process and then verified

whether State and DOD followed them for the 21 PDA packages approved during fiscal year 2024—19 for Ukraine and 2 for Haiti. We also reviewed documentation for one package for Taiwan, which was approved in fiscal year 2023. We interviewed DOD officials to discuss documentation requirements.

To describe DOD's use of supplemental funding to replace U.S. weapons provided to partners through PDA, we analyzed Offices of the Under Secretary of Defense and military department data for fiscal years 2022, 2023, and 2024 supplemental funding. We reviewed documentation provided by the DOD Comptroller to identify the amounts of replacement funding appropriated and obligated, as of November 2024. We also spoke to DOD officials from DSCA and the services to determine how DOD has considered replacement of defense articles in PDA package development. We reviewed agency documentation to confirm whether replacement had been considered when developing PDA packages.

We conducted this performance audit from March 2024 to May 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

List of Addressees

The Honorable Roger Wicker
Chairman
The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Lindsey Graham
Chairman
The Honorable Jeff Merkley
Ranking Member
Committee on the Budget
United States Senate

The Honorable James E. Risch
Chairman
The Honorable Jeanne Shaheen
Ranking Member
Committee on Foreign Relations
United States Senate

The Honorable Rand Paul, M.D.
Chairman
The Honorable Gary C. Peters
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Mitch McConnell
Chair
The Honorable Christopher Coons
Ranking Member
Subcommittee on Defense
Committee on Appropriations
United States Senate

The Honorable Lindsey Graham
Chairman
The Honorable Brian Schatz
Ranking Member
Subcommittee on State, Foreign Operations, and Related Programs
Committee on Appropriations
United States Senate

The Honorable Mike Rogers
Chairman
The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

The Honorable Jodey Arrington
Chairman
The Honorable Brendan Boyle
Ranking Member
Committee on the Budget
House of Representatives

The Honorable Brian Mast
Chairman
The Honorable Gregory Meeks
Ranking Member
Committee on Foreign Affairs
House of Representatives

The Honorable James Comer
Chairman
The Honorable Gerald E. Connolly
Ranking Member
Committee on Oversight and Government Reform
House of Representatives

The Honorable Ken Calvert
Chairman
The Honorable Betty McCollum
Ranking Member
Subcommittee on Defense
Committee on Appropriations
House of Representatives

The Honorable Mario Diaz-Balart
Chairman
The Honorable Lois Frankel
Ranking Member
Subcommittee on National Security, Department of State, and Related Programs
Committee on Appropriations
House of Representatives

We are sending copies of this report to the appropriate congressional Committees; the Secretary of Defense; and the Secretary of State. In addition, the report is also available at no charge on the GAO website at <https://www.gao.gov>.



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WASHINGTON, DC 20301-2800

MAY 01 2025

Ms. Chelsa Kenney
Director, International Affairs & Trade
U.S. Government Accountability Office
441 G Street NW, Washington, DC 20548

Dear Ms. Kenney,

Enclosed is the Department of Defense response to the GAO Draft Report, GAO-25-107475SU, "PRESIDENTIAL DRAWDOWN AUTHORITY: Guidance Should Reflect Expanded Use," dated March 14, 2025 (GAO Code 107475).

My point of contact is Ms. Tais Gomez, who can be reached by email at tais.gomez.civ@mail.mil or phone at (703) 697-9638.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Miller", is positioned above the printed name of the Director.

Michael F. Miller
Director

Enclosure:
As stated

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GAO DRAFT REPORT DATED MARCH 14, 2025
GAO-25-107475SU (GAO CODE 107475)

**“PRESIDENTIAL DRAWDOWN AUTHORITY: GUIDANCE SHOULD REFLECT
EXPANDED USE”**

**DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATION**

RECOMMENDATION 1: The Secretary of Defense should direct the Comptroller and DSCA to ensure PDA guidance addresses how replacement needs should be considered when developing PDA packages.

DoD RESPONSE: DoD partially concurs. DoD agrees that it would be beneficial to ensure Presidential Drawdown Authority (PDA) guidance addresses how replacement needs should be considered when developing Presidential Drawdown (PD) packages. However, DoD does not believe the Comptroller or DSCA are the appropriate offices within the DoD to implement this recommendation. Replacement needs are directly tied to operational readiness, which falls under the purview of the Office of the Under Secretary of Defense for Personnel and Readiness (OUSD P&R). Further, as noted in the report, OUSD (P&R) has already undertaken the task of developing a DoD Instruction (DoDI) to clarify guidance on how to conduct strategic readiness impact assessments and define roles and responsibilities of stakeholders in the development of PDA packages, as well as how DoD officials should assess replacement risks when preparing PDA packages. As of March 2025, the DoDI was still in the draft phase and was being considered for inclusion as DoD policy. DSCA will incorporate new or updated guidance to DoD policy into the Security Assistance Management Manual (SAMM), as appropriate.

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GAO Contact Information

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Endnotes

¹Presidential Drawdown Authority is considered security assistance, which DOD defines as a group of programs, authorized under Title 22 authorities, by which the United States provides defense articles, military education and training, and other defense-related services to eligible foreign partners by grant, loan, credit, cash sales, or lease in furtherance of national policies or objectives. Department of Defense, *Security Assistance Management Manual*, Chapter 1, accessed December 13, 2024, <https://samm.dsca.mil/chapter/chapter-1>.

²“Defense article” is defined as any weapon, weapons system, munitions, aircraft, vessel, boat, or other implement of war; any property, installation, commodity, material, equipment, supply, or goods used for the purposes of furnishing military assistance or making military sales; any machinery, facility, tool, material, supply, or other item necessary for the manufacture, production, processing, repair, servicing, storage, construction, transportation, operation, or use of any other defense article or any component or part of any articles listed above, but shall not include merchant vessels, or as defined by the Atomic Energy Act of 1954, as amended, source material, byproduct material, special nuclear material, production facilities, utilization facilities, or atomic weapons or articles involving Restricted Data. 22 U.S.C. §§ 2403(d) and 2794(3).

³According to State officials, the President delegated the Secretary of State the authority to direct DOD to execute PDA packages. See Administration of Foreign Assistance and Related Functions, Exec. Order No. 12,163, 44 Fed. Reg. 56,673 (Sept. 29, 1979), as amended, for delegation of certain responsibilities under the FAA to the Secretary of State.

⁴The President approved an additional PDA package for Ukraine valued at \$60 million dollars in August of 2021. This package was not included in our scope.

⁵For Section 506(a)(2), Congress also increased the ceiling on the portion of the amount that could come from DOD inventory from \$75 to \$150 million for fiscal years 2023 and 2024.

⁶Section 614 authorizes additional assistance under the FAA without regard to other provisions of law, if the President determines and reports to Congress that it is vital to U.S. national security interests. 22 U.S.C. § 2364. DOD provided additional assistance in each fiscal year under section 614 of the FAA, including \$128 million in fiscal year 2024.

⁷In May and June 2023, according to DOD officials, DOD notified Congress that it had misvalued ammunition, missiles, and other defense articles provided under PDA to Ukraine in fiscal years 2022 and 2023 by about \$2.6 billion and \$3.6 billion (\$6.2 billion total), respectively. The misvaluation was primarily the result of DOD valuing some of the defense articles it sent to Ukraine using the cost to replace the articles (replacement cost) rather than the value of the articles at the time of the drawdown. Consequently, because of the misvaluation, DOD determined that \$6.2 billion of previously announced PDA assistance for Ukraine was still available for use. See [GAO-24-106934](#) for more information on valuation of defense articles for provision under PDA.

⁸According to DOD officials, once the President authorizes a drawdown package, that authority does not expire. However, DOD officials explained that if the total assistance authorized by the President is less than the maximum authority set by Congress in a given fiscal year, the leftover authority expires at the end of the fiscal year for which Congress authorized it.

⁹According to DOD officials, the value of PDA packages are estimates and subject to change until packages are delivered. The aggregate and average monthly values of drawdowns presented are estimates as of January 31, 2025, according to data provided by DSCA.

¹⁰The Army, Marine Corps, Navy, Air Force, and United States Special Operations Command have all provided defense articles using PDA.

¹¹To improve implementation of DOD’s defense article transfer process in Ukraine, we previously recommended that DOD improve the accuracy of defense article delivery data. *Ukraine: DOD Should Improve Data for Both Defense Article Delivery and End-Use Monitoring*, [GAO-24-106289](#) (Washington, D.C.: March 2024).

¹²Operations and Maintenance budgets provide base funding used to pay for day-to-day programs and activities such as including support for installations, training and education, civilian personnel, maintenance, contracted services, and defense health.

¹³Department of Defense, *Security Assistance Management Manual*, Chapter 11, accessed April 10, 2024, <https://samm.dsca.mil/chapter/chapter-11>.

¹⁴GAO reported in 2016 on the extent to which DOD followed its guidance for PDA. See GAO, *Security Assistance: Guidance Needed for Completing Required Impact Assessments Prior to Presidential Drawdowns*, [GAO-17-26](#) (Washington, DC: Oct. 20, 2016).

¹⁵GAO previously reported on the status of replacement funding in 2024. See GAO, *Ukraine: Status and Challenges of DOD Weapon Replacement Efforts*, [GAO-24-106649](#) (Washington, DC: Apr 30, 2024). An obligation generally is a definite commitment that creates a legal liability of the government for the payment of goods and services ordered or received. Depending on the appropriation, some unobligated funds may expire and no longer be available for obligation. Other funds remain available for obligation. A disbursement, also called an outlay, generally is an amount paid by federal agencies to liquidate an obligation. (See [GAO-05-734SP](#).)

¹⁶In April 2024, Congress appropriated \$1.9 billion to respond to the situation in Taiwan and for related expenses, including the replacement of defense articles from DOD stocks transferred to Taiwan via PDA and reimbursement of DOD defense services and military education and training provided to Taiwan or to foreign countries that “provided support to Taiwan at the request of the United States.” Pub. L. No. 118-50, Div. C, 138 Stat. 925 (2024).

¹⁷GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014), Principle 12.