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"No Confidence" Votes and Other Forms of Congressional Censure of Public Officials

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Summary

S.J.Res. 14 of the 110th Congress, submitted on May 24, 2007, has been described as proposing a vote of no confidence in Attorney General Alberto Gonzales. This report discusses the possible significance of action by Congress or either House to adopt a resolution expressing “no confidence” in a cabinet official or other official in the executive branch of the federal government. It examines the legal issues that could be raised by resolutions of this kind and discusses the relation of such action both to votes of no confidence in systems of parliamentary government and to congressional action to censure or otherwise express disapprobation of public officials. It also describes known instances in which action to express a lack of confidence in, or impose another form of censure on, public officials have been attempted in Congress.

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"No Confidence" Votes in a System of Separated Powers

The use of the term "vote of no confidence" to reflect a Senate, House or joint congressional action on a resolution concerning an official of the executive branch might be somewhat misleading because of the particular nature and impact of "no confidence" votes in parliamentary democracies. A vote of no confidence has a technical meaning and concrete consequences only in a parliamentary form of government, in which the continuance of the executive in office is dependent on its maintaining majority support in the parliament (or one house thereof). The American system of separated powers, on the other hand, makes no provision for votes of no confidence in the parliamentary sense. Except through the process of impeachment, accordingly, no action by the Congress (or of either House) can have any practical effect similar to that of a parliamentary vote of no confidence.

For example, votes of "no confidence" or "votes of censure" in the British Parliament,[1] are votes instituted in Parliament by the opposition party which, if they succeed, indicate that the Government no longer has the support of the majority of Parliament (including the Government's own party members), and thus lead to a dissolution of the Government and new elections.[2] Under the U.S. system of

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[1] Although the phrase "vote of no confidence" is generally used in the United States to describe the process, in England, the completed vote on a motion introduced by the opposition is referred to as a "vote of censure."

[2] *Erskine May's Treatise on the Law, Privileges, Proceedings and Usage of Parliament*, Twenty-second edition (Sir Donald Limon and W.R. McKay, editors), at pp. 280-281 (1997). See William Safire, *Safire's Political Dictionary*, at 768 (1978): "[I]f a motion of

(continued...)

government, with the constitutional scheme of separated powers, the legislature — Congress — does not impact directly the removal of officials in the executive branch of the Federal Government (other than through impeachments). Adoption of a resolution expressing a lack of confidence could have symbolic effects as an expression of the sense of Congress (or of either House). A vote expressing "no confidence" of the Senate or the House in a particular official of the government, while it may certainly have political implications, would have no specific legal import.

Propriety of Congressional Censure of Public Officials

The issue of the propriety and the authority of Congress or of either House of Congress to officially express an opinion concerning an executive branch officer, such as an opinion that the President should remove an official, or that a cabinet official should resign, or to otherwise formally reprimand, "censure," or express disapprobation or loss of confidence concerning an executive official has been debated and questioned from time to time in the House and the Senate.[3] In early congressional considerations some Members of Congress, in their opposition to resolutions which declared either an opinion of praise or disapproval of the executive, cited the lack of an express constitutional grant of authority for the House or the Senate to state an opinion on the conduct or propriety of an executive officer in the form of a formal resolution of censure or disapproval.[4] Others have argued, including during the more recent consideration of the impeachment of President Clinton, that impeachment was the proper, and exclusive, constitutional response for Congress to entertain when the conduct of federal civil officers is called into question, rather than a resolution of censure.[5] Concerning judicial officers,

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[2] (...continued)
no confidence is introduced by the opposition in the House of Commons and passes, the result is called a *vote of censure* (although it contains the words "no confidence," it is not referred to as a *vote of no confidence*, except in America); in that case, the government is 'upset' or 'falls,' and an election is called."

[3] II *Hinds' Precedents of the House of Representatives* [*Hinds' Precedents*], §1569, p. 1029 (1907): "While the House in some cases has bestowed praise or censure on the President or a member of his Cabinet, such action has at other times been held to be improper."

[4] II *Hinds' Precedents*, at §1569, pp. 1029-1030: "It was objected that the Constitution did not include such expressions of opinion among the duties of the House ...." (Citing debate and vote on a resolution of approval of the President's conduct, which was laid on the table, 20 *Annals of the Congress*, 11th Cong., 2nd Sess., at 92 -118, 134-151, 156-161, 164-182, 187-217, 219 (1809)).

[5] Note discussion of a House resolution in 1867 expressing opinion on the unfitness for the office of Mr. Henry Smyth (II *Hinds' Precedents*, at §1581, pp. 1035-1036), and a 1924 Senate resolution indicating its sense that the President "immediately request the resignation" of the Secretary of Navy. 65 *Congressional Record*, 68th Cong., 1st Sess., 2223-2245 (1924). Both of these resolutions were objected to by some Members as interfering with the President's prerogatives in appointments and removals of executive officials, and the latter action as labeling with a "brand of shame" an individual in the Government without conducting impeachment proceedings. See discussion in Fisher, "Congress and the (continued...)

precedents indicate that the House has on occasion either rejected or not dealt with attempts to consider a "censure" motion of federal judges offered by the Judiciary Committee as an alternative to articles of impeachment, and parliamentarians have noted an apparent disinclination of the House to consider censure as part of the impeachment procedure.[6]

It has, however, become accepted congressional practice to employ a simple resolution of one House of Congress, or a concurrent resolution by both Houses, for certain non-legislative matters, such as to express the opinion or the sense of the Congress or of one House of Congress on a public matter, and a resolution expressing an opinion of "no confidence" in, or other expression of censure or disapproval of an executive branch official within a concurrent or simple resolution would appear to be in the nature of such a "sense of Congress" or "sense of the Senate" (or House) resolution.[7] The absence of express constitutional language that the Congress, or the House or the Senate individually, may state its opinion on matters of public import in a resolution of praise or censure is not necessarily indicative of a lack of capacity to do so, or that such practice is *per se* unconstitutional. It is recognized in both constitutional law and governmental theory that there are, of course, a number of functions and activities of Congress which are not expressly stated or provided in the Constitution, but which are nonetheless valid as either inherent or implied components of the legislative process or of other express provisions in the Constitution, or are considered to be within the internal authority

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[5] (...continued)
Removal Power," in *Congress & the Presidency*, Volume 10, at 67-68 (1983). Concerning the impeachment of President Clinton, see discussions in "Censure Option Losing Support in House," *The Hill*, September 16, 1998; "Senators Exploring a Form of Censure Are Bumping Into Obstacles," *Washington Post*, January 2, 1999.

[6] The censure of U.S. District Court Judge Harold Louderback, recommended in a Judiciary Committee report in 1933 instead of impeachment, was objected to, for example, by Rep. Earl Michener of Michigan, who explained: "I do not believe that the constitutional power of impeachment includes censure." The recommendation was not approved, and the House adopted as a substitute an amendment impeaching the judge. 3 *Deschler's Precedents of the U.S. House of Representatives* [*Deschler's Precedents*], Ch. 14, §1.3, p. 400 (1977). In other instances recommendations of censure of judges, as alternatives to impeachment, were made by the Judiciary Committee, but not acted on by the House. *Id*. at 400-401; III *Hind's Precedents*, *supra* at §§ 2519, 2520.

[7] "Simple resolutions are used in dealing with nonlegislative matters such as expressing opinions or facts .... Except as specifically provided by law, they have no legal effect, and require no action by the other House. Containing no legislative provisions, they are not presented to the President of the United States for his approval, as in the case of bills and joint resolutions." 7 *Deschler's Precedents*, Ch. 24, § 6. "[Concurrent resolutions] are not used in the adoption of general legislation. ... [They] are used in ... expressing the sense of Congress on propositions .... A concurrent resolution does not involve an exercise of the legislative power under article I of the Constitution in which the President must participate." *Id.* at § 5. Brown, *House Practice*, 108th Congress, 1st Sess., at 168: "Simple or concurrent resolutions are used ... to express facts or opinions, or to dispose of some other nonlegislative matter." See also Riddick & Frumin, *Riddick's Senate Procedure*, 1202 (1992).

of democratic legislative institutions and elective deliberative bodies generally.[8] The practice of the House, Senate, or Congress to express facts or opinion in simple or concurrent resolutions has been recognized since its earliest days as an inherent authority of the Congress and of democratic legislative institutions generally, and the adoption of "sense of" the House or Senate resolutions on various subjects and in reference to various people, is practiced with some frequency in every Congress.[9]

Relation to Other Forms of Congressional Action. The resolutions or statements both the House and the Senate have adopted in the past concerning a Government official, other than a Member of Congress, have expressed disapproval, censure, or opinion that an officer should be removed, Such an expression of opinion, censure, disapproval or lack of confidence in or of a federal officer by the House, the Senate, or the Congress is not an "impeachment" of that civil officer under Article I, Section 2, clause 5 and Section 3, clause 6 of the Constitution;[10] nor is it a "punishment" of one of the House's or Senate's *own* Members under Article I, Section 5, clause 2.

Furthermore, a censure or vote of no confidence would also not, in most cases, be within those inherent or implicit authorities, in the nature of contempt, typically imputed to democratic legislative assemblies to protect the dignity and integrity of the institution, its members and proceedings.[11] Finally, because there is no legal consequence to a resolution expressing an opinion of the Senate or the House, and because such expression in a simple resolution does not appear to technically be a "bill" referred to in the constitutional prohibition on "bills of attainder," it is unlikely that such an expression would violate that constitutional restriction on Congress.[12]

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[8] The most common example of inherent or implied authority of Congress is the oversight and investigatory authority of either House, including the power to compel attendance of witnesses and production of documents. Such authority is not expressly provided in the Constitution, but the ability to collect facts and opinions, and to publish such opinions and facts, are considered inherent in the authority to legislate. *McGrain v. Daugherty,* 272 U.S. 135 (1927); *Watkins v. United States,* 354 U.S. 178, 187, 200 (1957).

[9] See note 9, *supra;* Cushing, at 314. In the 105th Congress, for example, the House unanimously adopted a resolution to "condemn" as a "racist act" the alleged actions of three expressly named individuals in Texas who were arrested in connection with what is reported as a racially motivated homicide (H.Res. 466, 105th Cong).

[10] See 3 *Deschler's Precedents,* Ch. 14, § 1.

[11] As to inherent contempt authority, see *Anderson v. Dunn,* 19 U.S. 204 (1821). Note, generally, Cushing, *Elements of the Law and Practice of Legislative Assemblies in the United States of America* [Cushing], 245-255, 255-272 (1856). Since such action does not bear upon the proceedings and privileges of the House, and is not part of impeachment, such a resolution would generally not be considered to be a privileged resolution. See 3 *Deschler's Precedents,* Chapter 14, § 1, p. 401.

[12] Article I, Section 9, clause 3. See *Nixon v. Administrator of General Services,* 433 U.S. 425, 468 (1977); note definition of "bill" in 7 *Deschler's Precedents,* Ch. 24, § 2. For a discussion of these legal issues, and separation of powers considerations, see CRS Report 98-843, "Censure of the President by the Congress," by Jack Maskell.

Characteristics of Resolutions Proposed Since 1973

These resolutions, expressing the disapproval of Congress (or of either house) with an official of the executive branch, have in the past sometimes been submitted, and occasionally adopted.[13] For recent years, it has been possible to identify resolutions of this kind systematically through a search of the Legislative Information System of the Congress (LIS), which includes a database of introduced measures extending back to the 93rd Congress (1973-1974). An initial search identified simple and concurrent resolutions described with any form of the terms "confidence," "censure," or "condemnation." On the basis of information independently acquired about resolutions offered in the early 1950s against Secretary of State Dean Acheson, the search was also was extended to include simple and concurrent resolutions described with any form of the term "resignation." From among the measures identified by these searches, those relating to federal officials other than Members of Congress were selected.[14] These searches together yielded 31 resolutions submitted from the 93rd through 109th Congresses (1973-2006) and directed against federal officials. Information about the subject and form of these 31 measures is presented in Appendix 1.

Terms of Disapprobation Used. It appears that such resolutions have been stated not usually in terms of no confidence, but more often in terms of censure or condemnation, or as calls for resignation. Of the 31 resolutions identified by the search, 13 expressed censure of the official, condemnation of the official or his or her actions, or both. The remaining 18 resolutions called either for the official in question to resign or for the President to request resignation, making this form of disapproval the most common among measures identified from recent times.

Only one of the 31 resolutions referred explicitly to a loss of confidence, and this language was contained only in the preamble of a resolution that also called for resignation. Although the term "no confidence" was not necessarily expressly stated in nearly all of these resolutions, however, such opinion was obviously implied by the actual wording of a number of the resolutions.

Previous to S.J.Res. 14, nevertheless, no resolution known in recent times has stated only a loss of confidence, unaccompanied by reference to any other form of disapprobation. The use solely of this language might suggest a lack of awareness that the reference to a loss of confidence, in the American context, lacks any distinctive or special force not shared by other terms in which resolutions with similar prospective effects have been couched. The use of "no confidence" language would not suffice actually to endow the proposal uniquely with any such distinctive or special force.

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[13] For examples, see archived CRS Report 98-983 GOV, *Censure of Executive and Judicial Branch Officials: Past Congressional Proceedings*, by Richard S. Beth (available from the author).

[14] One of the resolutions included proposes to censure a former official for acts subsequent to leaving office; it was included in the analysis on the principle that borderline cases were better taken into consideration than ignored.

Preambles. Most of the resolutions identified that were submitted in or after 1973 have included a preamble stating the reasons for the congressional disapproval. Of the total of 31, just three lacked such a preamble. The current S.J.Res. 14, which also lacks a preamble, accordingly represents a less common variation.

Inclusion of "Sense" Language. Similarly, 16 of the 31 resolutions identified by electronic search explicitly declared themselves to be statements of the sense of the Congress or of the house acting (usually in those terms, though a few refer instead to the "sentiment" or "judgment" of Congress or either house). This form of language again appears consistent with an understanding that any such measure could have symbolic, rather than determinative, effects. This language appears to have been included in measures of this kind less frequently since 1996 (105th Congress), but is adopted by S.J.Res. 14.

Form of Measure. All 31 of the resolutions identified through the electronic search were either concurrent resolutions or simple resolutions of one house. No search was conducted for joint resolutions, because of the inappropriateness of this form of measure to the kind of action possible in the American system. For this reason, no conclusion can be offered about whether any earlier measures to express disapproval of a federal official have taken the form of a joint resolution.

Use of simple and concurrent resolutions suggests awareness that adoption of such a measure would have no imperative force parallel to that of a vote of no confidence in a parliamentary system. By contrast, even though the language of S.J.Res. 14 explicitly disavows any mandatory intent, by stating itself as an expression of the sense of the Senate, the measure is couched as a joint resolution. Joint resolutions are normally lawmaking vehicles, and require passage by both chambers and presentation to the President. It is not clear what proponents intend by submitting the measure in this form, which would have the effect of affording the House of Representatives and the President a role in stating what the sense of the Senate is. It is conceivable that the use of this form of measure in the current case implicitly indicates an intent to achieve effects resembling those of an actual vote of no confidence.

Legislative Action. Congress did not finally adopt any of the 31 resolutions identified in the present search, and on none but two did any floor action occur at all. In 1997 (105th Congress), the House adopted H.Con.Res. 197, declaring that Sara A. Lister, Assistant Secretary of the Army for Manpower and Reserve Affairs, should resign or be removed. In 1999 (106th Congress), the Senate rejected an attempt to bring to the floor S.Res. 44, censuring President Clinton.

Examples of Earlier Resolutions

No feasible means appeared of comprehensively identifying similar measures for the period preceding the availability of electronically searchable data. In the historical period before that covered by the LIS database, nevertheless, several instances are known in which the House or the Senate expressed a specific opinion

disapproving of conduct of an executive official, or suggesting that a particular executive officer resign or be removed by the President.[15]

The instances discussed in this section constitute only examples of congressional actions; they are known not to compose a comprehensive list of all resolutions to censure executive (and judicial) officials that may have been adopted or considered by either House. Accordingly, available information can permit no definite assertion whether a vote of no confidence fully similar to that proposed by S.J.Res. 14 has ever previously occurred in American history. It might be considered unlikely, however, that resolutions critical of officials during earlier periods of history would have been couched solely in terms of "no confidence," because proponents would likely have understood that these terms have a technical meaning only in a parliamentary system of government.

Censure and Condemnation. The earliest attempt to censure an official found thus far concerned a series of resolutions proposing the censure and disapproval of Secretary Alexander Hamilton in 1793, the texts of which were considered by historians to have been drafted by Thomas Jefferson for introduction by Representative William Branch Giles of Virginia.[16]

In 1860, the House of Representatives adopted a resolution stating that the conduct of the President, and his Secretary of the Navy, was deserving of its "reproof," in a matter concerning the alleged conduct of President Buchanan and his Secretary of the Navy in allowing political considerations and alleged campaign contribution "kickbacks" to influence the letting of Government contracts to political supporters, rather than the lowest bidder.[17] After debating both the substance of the charges and the authority of the House to adopt such a resolution, characterized by one Member as "censur[ing] indiscriminately the President of the United States and the Secretary of Navy,"[18] the House adopted the resolution 106-61.[19]

The Senate adopted a resolution in 1886 in which it expressed its "condemnation" of President Cleveland's Attorney General A.H. Garland concerning

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[15] The examples discussed in the section on "Censure and Condemnation" are drawn from CRS Report 98-983, "Censure of Executive and Judicial Branch Officials: Past Congressional Proceedings," by Richard S. Beth (archived, available from the author).

[16] Sheridan, Eugene R., "Thomas Jefferson and the Giles Resolutions," *William and Mary Quarterly*, Third Series, Volume 49, Issue 4, at 589-608 (October 1992). The resolutions did not pass.

[17] "*Resolved*, That the President and Secretary of the Navy, by receiving and considering the party relations of bidders for contracts with the United States, and the effect of awarding contracts upon pending elections, have set an example dangerous to the public safety, and deserving the reproof of this House." *Congressional Globe*, 36th Congress, 1st Sess., 2951 (June 13, 1860).

[18] *Id.* at 2951. (Mr. Clark of Missouri).

[19] *Id.*, at 2951.

his refusal to provide certain records and papers to the Senate about the removal from office of a district attorney by the President.[20]

In 1896, the House adopted a resolution where it found that a United States Ambassador, by his speech and conduct "has committed an offense against diplomatic propriety and an abuse of the privileges of his exalted position," and therefore, "as the immediate representatives of the American people, and in their names, we condemn and censure the said utterances of Thomas F. Bayard."[21]

Resignation and No Confidence. Some congressional resolutions over the years have merely found misconduct on the part of an executive officer and urged the President to seek the officer's resignation, without expressing a specific term of censure or condemnation, or a specific expression of loss of "confidence." For example, after having conducted investigations into the conduct of the administration of the New York custom-house by Mr. Henry Smyth, and finding that "there is not sufficient time prior" to adjournment to finish the matter, the House expressed in a resolution "Henry A. Smyth's unfitness to hold the office," and recommended that he "should be removed from the office of collector."[22]

Similarly, the Senate in 1924, during the Teapot Dome investigation passed a resolution indicating its sense that the President "immediately request the resignation" of the Secretary of Navy.[23]

In the 81st and 82nd Congresses (1949-1952), six resolutions were submitted containing demands for the resignation of Secretary of State Dean Acheson, and one seeking that of Secretary of Defense George C. Marshall. All of these resolutions, unlike many more recent measures, lacked preambles setting forth the reasons for the action. These measures provide one of the few earlier instances known that were described as proposing votes of no confidence in the respective officials. Three of the seven resolutions explicitly stated a popular loss of confidence along with (but not instead of) the calls for resignation (although one, like the 1983 instance discussed earlier, did so only in the preamble). Several of these resolutions, apparently including those whose text did not contain this explicit phrase, were also described, in public discussion, as declarations of no confidence. Finally, during the same time period, a loss of public confidence in Secretary Acheson was declared by votes of the Republican Conference in at least one chamber. These events illustrate that a resolution may be described as a "no confidence" measure without having the

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[20] 17 *Congressional Record*, 49th Cong., 1st Sess., pp. 1584-1591, 2784-2810 (March 26, 1886): "*Resolved*, That the Senate hereby expresses its condemnation of the refusal of the Attorney-General, under whatever influence, to send to the Senate copies of papers called for by its resolution of the 25th of January, and set forth in the report of the Committee on the Judiciary, is in violation of his official duty and subversive of the fundamental principles of the Government and of a good administration thereof."

[21] 28 *Congressional Record*, 54th Cong., 1st Sess., p. 3034 (March 20, 1896).

[22] *Congressional Globe*, 40th Cong., 1st Sess., pp. 255-256, 282-285, 394-395 (1867).

[23] 65 *Congressional Record*, 68th Cong., 1st Sess., 2223-2245 (February 11, 1924).

characteristics that would make it equivalent to an actual vote of no confidence in a parliamentary system.

Concluding Observations

Although there has been discussion in both Houses of Congress of the appropriateness of such actions, resolutions have been introduced and considered in each House of Congress in the past, and on occasion have been adopted, wherein the House or the Senate has expressed the "sense" of the institution that an official in the executive branch has engaged in conduct worthy of censure, condemnation, or other expression of disapprobation; should resign or be removed by the President; and, in a few circumstances, expressly stating in the preamble or the operative portion of the resolution that the public or the particular House of Congress has lost "confidence" in the official. Such actions and proposals would appear to be in the nature of "sense of Congress" or "sense of the Senate" (or House) resolutions in which it has been the practice for the Senate or the House to address certain non-legislative matters, such as to express the opinion or the sense of Congress or of one House of Congress on a public matter.[24] Aside from obvious symbolic, political or publicity implications, there are no specific legal consequences in the passage of such a resolution, nor is there any legal significance or consequence for the Senate or the House to choose one phrase of disapprobation or condemnation over another, or to include or not to include the concept or expression of a loss of "confidence" in an official.

Several features of S.J.Res. 14 seem to make explicit its difference from an actual "vote of no confidence" such as could occur in a parliamentary system, but others suggest a failure to take account of that difference. To the extent that the resolution purports to present a proposition functionally similar to a vote of no confidence in a parliamentary system, present knowledge does not permit identifying any similar proposition as having been offered in the past. On the other hand, to the extent that the present resolution purports to present such a proposition, it cannot, under the American constitutional system, succeed in doing so. Instead, the proposition actually presented by the resolution can only be that of expressing congressional disapproval of a federal official, and in that general respect the resolution is not dissimilar from a number of others that have been offered, from time to time, throughout American history.

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[24] 7 *Deschler's Precedents*, Ch. 24, § 6; Riddick & Frumin, *Riddick's Senate Procedure*, 1202 (1992).

Appendix. Congressional Resolutions Expressing Disapprobation of Executive Branch Officials, 1973-2006

Con gress	Measure number and date of introduction	Official	Framing	Provisions on			Notes and *(in italics) Floor Action*
				Loss of Confidence	Resignation	Censure	
93	H.Con.Res. 371 10/20/1973	President Richard M. Nixon	Preamble; sense of Congress			Censure	Each resolution also states that this action carries no prejudice to impeachment
93	H.Con.Res. 365 10/23/1973	President Richard M. Nixon	Preamble; sense of Congress			Censure, condemn	
93	S.Res. 191 10/23/1973	Solicitor General (Acting Attorney General) Robert Bork	Preamble			*In title:* censure; *in body:* condemn	
93	H.Con.Res. 376 11/7/1973	President Richard M. Nixon	Preamble; sense of Congress		Should resign		

Congress	Measure number and date of introduction	Official	Framing	Provisions on			Notes and *(in italics)* *Floor Action*
				Loss of Confidence	Resignation	Censure	
93	H.Res. 684 11/6/1973	President Richard M. Nixon	Preamble; Judgment of House		Should resign		Identical resolutions also ask that Nixon first nominate someone other than Gerald Ford to be Vice President
93	H.Res. 734 12/4/1973	President Richard M. Nixon	Preamble; Judgment of House		Should resign		
93	H.Res. 1288 8/4/1974	President Richard M. Nixon	Preamble			Censure	
93	H.Con.Res. 589 8/6/1974	President Richard M. Nixon	Preamble; sense of Congress			Censure	Also sense of Congress that if Nixon resigns, impeachment not be pursued
96	H.Con.Res. 146 6/26/1979	Secretary of Energy James Schlesinger			Should resign		
96	H.Con.Res. 161 7/12/1979	Secretary of Energy James Schlesinger	Preamble		Should resign		

Congress	Measure number and date of introduction	Official	Framing	Provisions on			Notes and *(in italics)* *Floor Action*
				Loss of Confidence	Resignation	Censure	
97	H.Con.Res. 242 12/16/1981	Environmental Protection Agency Director Anne Gorsuch	Preamble; sense of Congress		Should resign		
97	H.Con.Res. 247 1/26/1982	Federal Reserve Board Chairman Paul Volcker	Preamble; sense of Congress		Should resign		
98	H.Res. 321 9/28/1983	Secretary of the Interior James Watt	Sense of House		President should ask		
98	H.Res. 324 9/29/1983	Secretary of the Interior James Watt	Preamble; sense of House	*in preamble:* people lost	President should ask		
98	H.Con.Res. 249 2/2/1984	Secretary of Defense Caspar Weinberger	Sense of Congress		Should resign		
103	H.Res. 545 9/23/1994	Surgeon General Jocelyn Elders	Preamble; sense of House		President should ask		
103	H.Con.Res. 297 9/26/1994	Surgeon General Jocelyn Elders	Preamble; sense of Congress		President should ask		

Congress	Measure number and date of introduction	Official	Framing	Provisions on			Notes and *(in italics)* *Floor Action*
				Loss of Confidence	Resignation	Censure	
104	H.Res. 283 11/28/1995	Secretary of Energy Hazel O'Leary	Preamble; sense of House		President should ask		Also provisions on reimbursement
104	H.Res. 308 12/15/1995	Secretary of Energy Hazel O'Leary	Preamble; sense of Congress		President should ask		Also provisions on investigation and reimbursement
105	H.Con.Res. 197 11/13/1997	Assistant Secretary of the Army for Manpower and Reserve Affairs Sara E. Lister	Preamble		Should resign or be removed		*House adopted, 11/13/1997*
105	H.Res. 531 9/11/1998	President William Jefferson Clinton	Preamble		House calls upon to resign		
106	S.Res. 44 2/12/1999	President William Jefferson Clinton	Preamble			Censure; condemn conduct	*Senate rejected attempt to bring to floor, 2/12/1999*
106	H.Res. 416 2/7/2000	U.S. District Judge Alan McDonald	Preamble			Condemn conduct	
108	H.Res. 419 10/28/2003	Deputy Undersecretary of Defense Lieutenant General William Boykin	Preamble			President should censure	

Congress	Measure number and date of introduction	Official	Framing	Provisions on			Notes and *(in italics) Floor Action*
				Loss of Confidence	Resignation	Censure	
108	H.Res. 420 10/28/2003	Deputy Undersecretary of Defense Lieutenant General William Boykin	Preamble			Condemn rhetoric	
108	H.Con.Res. 323 11/7/2003	Secretary of Defense Donald Rumsfeld	Preamble		President should ask		
109	H.Con.Res. 470 9/13/2006	Secretary of Defense Donald Rumsfeld	Preamble; sense of Congress		effect resignation		"Replace" in title; not found by search
109	S.Res. 262 9/30/2005	former Secretary of Education William J. Bennett	Preamble			Condemn statement	
109	H.Res. 636 12/18/2005	President George W. Bush	Preamble			Censure	
109	H.Res. 637 12/18/2005	Vice President Richard B. Cheney	Preamble			Censure	
109	S.Res. 398 3/13/2006	President George W. Bush	Preamble			Censure; condemn actions	