



## Subject-by-Subject Breakdown of Trump’s Project 2025

Project 2025 is the blueprint for Trump and MAGA Republicans to **gut checks and balances** so that they can **take over the government, impose their agenda,** and **control every American.** They plan to use this unchecked power to ban abortion nationwide, sell out the middle class, end Social Security and Medicare as we know it, and control the rest of our lives.

### Project 2025

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## Executive Summary

The 2025 Presidential Transition Project, also known as Project 2025, is a detailed plan for Trump and MAGA Republicans to gut checks and balances, take over the government, and impose their agenda. Armed with Project 2025, infused with absolute immunity from the MAGA Supreme Court, and unrestrained by the checks and balances that safeguarded certain rights and freedoms during the first term, Trump would have everything he needs to enact a radical MAGA takeover. Trump's Project 2025 will imbue Trump and his inner circle with unprecedented control over our lives.

### Components of Project 2025

Project 2025 [declares](#) it "paves the way for an effective conservative administration based on four pillars."

- (1) **Policy Agenda:** The 920-page "Mandate for Leadership" provides a detailed policy and personnel blueprint for the next president to weaponize, restructure, or abolish every federal agency.
- (2) **Personnel Database:** Collects thousands of resumes from MAGA loyalists to replace non-partisan civil servants with political appointees that pass the MAGA loyalty test.
- (3) **Administration Academy:** private training center to shape and prepare MAGA loyalists to take over government positions and politicize the civil service.
- (4) **180-Days Playbook:** Unpublished transition plan to immediately operationalize Project 2025, including executive actions and personnel changes to carry out Trump's promise of being "a dictator on Day 1."

The loyalty test questionnaire for Project 2025's presidential personnel database and presidential administration academy questionnaire can be found [here](#).

### Principles of Project 2025

In their own [words](#), Project 2025 has four main goals to shape America's future:

- Restore the family as the centerpiece of American life and protect our children
- Dismantle the administrative state
- Defend our nation's sovereignty, border, and bounty against global threats
- Secure God-given individual rights to live freely

### Summary of Policy Agenda

#### Takes Over the Government to Assert Total Control

- **Guts Checks and Balances:** Consolidated unchecked presidential power by purging the civil service, firing independent agency leaders, destroying entire agencies, and conditioning federal funding on political fealty. Project 2025 compromises the ability of every civil servant to uphold the law and forces them to serve the president at the expense of the public.
- **Political Purge of the Civil Service:** Imposes loyalty tests and purges thousands of independent civil servants so that the president can give control to thousands of political operatives, hand-picked for their unquestioned loyalty to the president regardless of qualifications, expertise, or commitment to constitutional duty.
- **Seizes control of independent agencies:** Fires independent agency leaders and forces independent agencies from the Federal Reserve to the FDA and the FCC to the CIA to prioritize the narrow interests of the president over their expertise, professional judgment and constitutional duty.

- **Weaponizes the Justice System:** Ends the independence of the DOJ, FBI and White House Counsel so that the president can turn them into the enforcement arms of the president, including politicizing law enforcement, controlling prosecutions, targeting political opponents, and enforcing his agenda.
- **Usurp the Power of the Purse:** Alludes to a plan developed by the architects of Project 2025 to resurrect the Impoundment Act so that the president can unilaterally block congressionally-mandated spending.
- **Undermines Congressional Oversight:** Evades the Senate’s constitutional obligation to give advice and consent on the president’s appointees and obstructs transparency, accountability and oversight.

### Threatens Personal Freedoms and Rights

- **Slashes Reproductive Freedom in Every State:** Criminalizes medication abortions nationwide, bans abortion pills, creates an “abortion surveillance” regime to monitor all pregnancies to prosecute potential miscarriages, restricts birth control, and limits access to fertility services like IVF. It declares that the “Dobbs decision was just the beginning.”
- **Attacks LGBTQ+ Americans:** Declares that anti-LGBTQ+ discrimination should be legal, rescinds nondiscrimination protections for LGBTQ+ Americans, undermines the rights of same-sex married couples, criminalizes gender nonconformity, bans transgender people from the military, weaponizes federal law to require states and private actors to discriminate against transgender people, and dismantles services for LGBTQ+ Americans wherever possible, including by mandating the federal government to officially adopt the stance that marriage is only between a man and woman.
- **Undermines Racial Equality:** Defunds services for underserved communities and emboldens racial discrimination in everything from housing to education to employment by systematically eliminating programs and policies that prevent discrimination or promote racial diversity, equity and inclusion. It further hinders efforts to address racial inequalities by prohibiting the collection of data related to race and ethnicity and by firing any federal employee that participated in a DEI program. In specific programs, it would absolve police departments under federal oversight for racial discrimination and wipe out the Office of Civil Rights responsible for protecting students and educators from discrimination.
- **Rolls Back Women’s Rights:** On top of an unprecedented assault on reproductive freedom and sexual health, Project 2025 calls for the removal of “gender equality” or “gender equity” from every piece of federal legislation and reverses every policy, regulation and executive order aimed at promoting gender equality, including immediate dissolving the Gender Policy Council. Repeals any programs “subsidizing single-motherhood” and eliminates services for working families, including overtime pay and Head Start. Rewrites Title IX and makes it harder to report sexual harassment and assault.
- **Mass Detainments and Deportations:** Carries out large-scale raids across the country to round up and detain millions of immigrants who have been living and working here for decades, including DREAMERS. Millions of people would be forced into detention camps near the border and deported en masse as part of the largest domestic deportation operation in American history.
- **Deploys the Military Domestically to Quash Protests:** The secret 180-Day Playbook reportedly includes a plan for Trump to invoke the Insurrection Act so that he can deploy the

military to any state for domestic law enforcement and to put down protests and silence political opponents.

- **Curtails Free Speech:** Directs the DOJ to investigate and prosecute private actors involved in promoting equity and inclusion programs, rolls back online free speech protections, and contemplates denying access to the White House Press Corps.
- **Outlaws Pornography and Bans Books:** Seeks to outlaw pornography and imprison anyone involved in producing or distributing it. It implies that LGBTQ+ materials are inherently pornographic, which is the pretext for book banning. Hence it seeks to register educators and librarians that share information related to transgender people as sex offenders. It also wants to shut any technology company that distributes the same.

### Hurts the Middle Class and Working Families

- **Ends Social Security and Medicare as we know them:** Rips retirement and healthcare security from America's seniors. Although Project 2025 claims that Social Security and the Medicare Trust Fund "could not be covered here in depth," this conceals the fact that Project 2025's architects openly call for cutting Social Security, raising the retirement age, and turning Medicare into a privatized voucher program. Project 2025 also explicitly declares that it will make Medicare Advantage the default option, which would shift millions of seniors off of traditional Medicare and serve as a backdoor for privatization. It also eliminates the Medicare Shared Savings Program.
- **Raises prescription drug prices:** Undoes Medicare's new ability to negotiate prescription drug prices, eliminates the \$35 monthly limit on insulin prices, and abolishes the cap on out-of-pocket drug expenses for seniors.
- **Guts Medicaid:** Threatens to kick up to 18.5 million Americans off Medicaid by imposing draconian time limits or lifetime caps. Recommends further gutting Medicaid by turning it into an underfunded block grant or voucher program.
- **Cripples Public Education:** Completely eliminates the Department of Education, slashes public school funding, and redirects taxpayer dollars to religious private schools.
- **Eliminates Head Start:** Eliminates the Head Start program, which provides preschool education for over 1 million children in low-income families. Project 2025 also rejects universal child care.
- **Slashes food assistance:** Guts SNAP and WIC while rejecting efforts to offer free universal school meals.
- **Ends overtime pay:** Allows employers to stop paying overtime and rolls back overtime protections.
- **Raises taxes on the middle class and cuts taxes for wealthiest corporations and individuals:** Restructures the tax code to lower taxes for large corporations and wealthy individuals offset by tax increases on middle class families.
- **Increases housing costs:** Slashes funding for affordable housing, increases mortgage insurance premiums on FHA loans, and restricts eligibility for first-time homebuyer programs.
- **Multiplies the costs of higher education and blocks student debt relief:** Ends existing affordable student loan repayment plans, privatizes all student loans, and eliminates student loan forgiveness for teachers, nurses, law enforcement officers, public servants,

and other eligible borrowers. It also calls for legislation to repeal any option for a student-friendly administration to cancel or forgive student loans.

- **Rolls Back Labor Protections:** Guts the capacity of the NLRB and EEOC to protect workers and calls for state waivers from key labor standards such as the minimum wage, overtime pay and right to organize. It also makes it harder for workers to organize and form unions, and it eviscerates child labor standards that protect children from hazardous jobs.
- **Abandons our Veterans:** Slashes federal jobs held by veterans and drastically limits the disability benefits for which veterans can qualify. It also bans transgender troops from service, revokes the VA's ability to provide abortion-related care, and slashes the number of general officers.

### Puts Americans in Greater Danger

- **Destabilizes the Economy:** Compromises the autonomy, professionalism and effectiveness of the civil service and independent agencies like the Federal Reserve and FCC which are responsible for protecting the stability of our economy through durable governing capabilities.
- **Hurts Election Integrity:** Eliminates CYBERCOM's role in protecting U.S. elections from cyberattacks, including from foreign actors.
- **Damages Allies and Global Stability:** Reorients alliances and pulls out of international organizations aimed at maintaining global peace and prosperity.
- **Undermines National Security:** Strips disfavored Purges the Intelligence Community of disfavored experts and civil servants to empower cronies loyal only to Trump, regardless of their qualifications disfavored experts and civil servants non-loyalists Intelligence Community/National Security
- **Undermines Public Safety:** Makes it easier for people who want to commit violence to carry guns and harder for law enforcement to solve violent crimes.
- **Threatens Consumer Safety:** Curtails consumer protections and privatizes or politicizes the FDA, FAA, TSA, and other agencies responsible for ensuring that our food, medicines, travel and products remain the safest in the world.
- **Endangers Critical Health Research:** Politicizes, restricts and ends NIH grants or investments in research labs and universities working to cure Alzheimers, cancer, and other health issues.
- **Limits Life-Saving Weather Alerts:** Privatizes the weather service, which is responsible for preparing for extreme weather events such as heat waves, floods and wildfires. This will force Americans to pay for weather data and restrict access to life-saving weather alerts.
- **Reverses Climate Action:** Cuts scientific and climate research, dismantle environmental protections, and sell off federally protected public lands to the highest bidder. It also disbands the Environmental Protection Agency, undermining clean air and water protections.

### Backers and Authors

Project 2025 is the concerted effort of former Trump officials, rightwing operatives, and dark money backers. That includes [Russ Vought](#), a self-described Christian Nationalist who authored part of Project 2025, served as Trump's Director of the Office of Management and Budget (OMB), and was appointed by the Trump Campaign and the Republican National Committee (RNC) to serve as Policy Director of the Republican Platform Committee.

The entire leadership team of Project 2025 served in Trump's White House, and most of its authors are former Trump aides and officials who are likely to serve in any future potential Trump administration. Learn more about the key players behind the Project 2025 plan to "institutionalize Trumpism" [here](#).

**Project 2025 is being organized by the Heritage Foundation.** "The 2025 Presidential Transition Project is being organized by The Heritage Foundation and builds off Heritage's longstanding 'Mandate for Leadership,' which has been highly influential for presidential administrations since the Reagan era. Most recently, the Trump administration relied heavily on Heritage's 'Mandate' for policy guidance, embracing nearly two-thirds of Heritage's proposals within just one year in office." [About, Project 2025, accessed [6/24/24](#)]

**Paul Dans is the director of the 2025 Presidential Transition Project and Spencer Chretien serves as associate director.** "Paul Dans, former chief of staff at the Office of Personnel Management (OPM) during the Trump administration, serves as the director of the 2025 Presidential Transition Project. Spencer Chretien, former special assistant to the president and associate director of Presidential Personnel, serves as associate director of the project." [About, Project 2025, accessed [6/24/24](#)]

#### The Advisory Board for Project 2025 includes:

- 1792 Exchange
- American Accountability Foundation
- AAPLOG
- Alabama Policy Institute
- Alliance Defending Freedom
- ACLJ Action
- American Commitment
- American Compass
- American Cornerstone Institute
- The American Conservative
- American Council of Trustees and Alumni
- American Family Association
- ~~America First Legal~~ (Stephen Miller's group recently asked to be [removed](#) from board)
- American Juris Link
- ALEC
- The American Main Street Initiative
- American Moment
- American Principles Project
- The American Family Project
- ~~Americans United for Life~~ (recently [dropped](#) as a member of advisory board)
- AMAC Action
- California Family Council
- Calvert Task Group
- Center for Equal Opportunity
- Center for Family & Human Rights
- Center for Immigration Studies
- Center for Renewing America
- Council for Citizens Against Government Waste
- The Claremont Institute
- Coalition for a Prosperous America
- Concerned Women for America
- Conservative Partnership Institute
- Defense of Freedom Institute
- Eagle Forum
- Ethics and Public Policy Center
- Family Policy Allowance
- Family Research Council
- Feds for Freedom
- First Liberty
- For America
- Forge Leadership Network
- Foundation for American Innovation
- Foundation for Government Accountability
- Freedom's Journal Institute
- The Frederick Douglass Foundation
- Heartland Institute
- Heritage Foundation
- MacArthur Society of West Point Graduates
- Hillsdale College
- Honest Elections Project
- Independent Women's Forum
- Institute for Education Reform
- Institute for Energy Research
- Institute for the American Worker
- Institute for Women's Health
- Intercollegiate Studies Institute
- James Madison Institute
- JCN
- Keystone Policy
- Leadership Institute
- Liberty University
- ~~Maackinac Center for Public Policy~~ (recently [dropped](#) as a member of advisory board)
- MRC
- Mississippi Center for Public Policy
- Moms for Liberty
- National Association of Scholars

- National Center for Public Policy Research
- Native Americans for Sovereignty & Preservation
- Noah Webster Educational Foundation
- OCPA
- Project 21 Black Leadership Network
- Pacific Research Institute
- Patrick Henry College
- Personnel Policy Operations
- Public Interest Legal Foundation
- Recovery for America Now Foundation
- Starrs
- Susan B. Anthony Pro-Life America
- Tea Party Patriots
- Texas Public Policy Foundation
- Teneo
- Turning Point USA
- Young America's Foundation

[Advisory Board, Project 2025, accessed [11/14/23](#)]

In recent months, several advisory board members have disassociated themselves from Project 2025 in response to growing public criticism. These include America First Legal, Americans United for Life, and Mackinac Center for Public Policy.

## Consolidating Presidential Power

### Top Lines

- ✓ Arms second Trump Administration with a comprehensive guide for gutting checks and balances in order to take over the federal government and grant the president unprecedented, unchecked power.
- ✓ Reinstates Trump's Schedule F Executive Order and purges the civil service of nonpartisan federal workers to replace them with thousands of political appointees hired based on their willingness to put loyalty to the president above their constitutional duty.
- ✓ Obstructs and intimidates apolitical and non-ideologically aligned civil servants to diminish their ability to fairly and independently serve the public interest.
- ✓ Empowers the president to fire independent agency leaders, defying Congress's considered choice to insulate these agencies against political interference.
- ✓ Compromises the functioning of our economy and public services by destroying entire agencies.
- ✓ Attacks public sector unions.
- ✓ Politicizes grantmaking by conditioning or withholding federal funding to States, local governments, nonprofits and private actors to force compliance with the Administration's extremist agenda.
- ✓ Abuses executive authority and the justice system.
- ✓ Obstructs transparency, oversight, and public participation.
- ✓ Undermines congressional oversight by evading the Senate's constitutional obligation to give advice and consent on the president's appointees and by blocking communication between agencies and oversight committees.
- ✓ Uses the powers of DOJ and independent regulatory agencies to investigate and prosecute organizations and individuals associated with DEI or ESG policies or programs.
- ✓ Use the power of granting/revoking security clearances to empower and neuter political agency personnel according to the Administration's wishes.

### Taking the Reins of the "Administrative State"

**Project 2025 calls for loyalists to take the reins of government by centralizing total control of the administrative state in the Oval Office in the false name of "deconstructing the centralized administrative state."** "When it comes to ensuring that freedom can flourish, nothing is more important than deconstructing the centralized administrative state. Political appointees who are answerable to the

President and have decision-making authority in the executive branch are key to this essential task. The next Administration must not cede such authority to non-partisan “experts,” who pursue their own ends while engaging in groupthink, insulated from American voters.” [Taking the Reins of Government, page 21, accessed [6/24/24](#)]

**Project 2025 declares dismantling the “Administrative State” must be “a top priority for the next conservative President.”** “And despite its gaudy price tag, the federal budget is not even close to the worst example of this corruption. That distinction belongs to the ‘Administrative State,’ the dismantling of which must be a top priority for the next conservative President. The term Administrative State refers to the policymaking work done by the bureaucracies of all the federal government’s departments, agencies, and millions of employees. Under Article I of the Constitution, ‘All legislative Powers herein granted shall be vested in a Congress of the United States, which shall consist of a Senate and a House of Representatives.’ That is, federal law is enacted only by elected legislators in both houses of Congress.” [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025 plans to “fill its ranks with political appointees” who are loyal above all to the president.** “In order to carry out the President’s desires, political appointees must be given the tools, knowledge, and support to overcome the federal government’s obstructionist Human Resources departments. More fundamentally, the new Administration must fill its ranks with political appointees.” [Taking the Reins of Government, page 20, accessed [6/24/24](#)]

**Project 2025 calls for the “aggressive use of the vast powers of the executive branch” by the next conservative president “to bend or break the bureaucracy to the presidential will.”** “Sadly, however, a President today assumes office to find a sprawling federal bureaucracy that all too often is carrying out its own policy plans and preferences—or, worse yet, the policy plans and preferences of a radical, supposedly ‘woke’ faction of the country. The modern conservative President’s task is to limit, control, and direct the executive branch on behalf of the American people... The great challenge confronting a conservative President is the existential need for aggressive use of the vast powers of the executive branch to return power—including power currently held by the executive branch—to the American people. Success in meeting that challenge will require a rare combination of boldness and self-denial: boldness to bend or break the bureaucracy to the presidential will and self-denial to use the bureaucratic machine to send power away from Washington and back to America’s families, faith communities, local governments, and states. Fortunately, a President who is willing to lead will find in the Executive Office of the President (EOP) the levers necessary to reverse this trend and impose a sound direction for the nation on the federal bureaucracy.” [Central Personnel Agencies: Managing the Bureaucracy, pp. 43-44, accessed [6/24/24](#)]

## Schedule F

Project 2025 reinstates Trump’s Executive Order 13957, establishing Schedule F, which allows the president **to install political operatives into the Executive Branch without expiration dates, forces the conversion of apolitical career federal employees into presidentially-controlled political appointments, and empowers the president to fire more civil servants deemed disloyal or non-ideologically compliant.** “Frustrated with these activities by top career executives, the Trump Administration issued Executive Order 13957 to make career professionals in positions that are not normally subject to change as a result of a presidential transition but who discharge significant duties and exercise significant discretion in formulating and implementing executive branch policy and programs an exception to the competitive hiring rules and examinations for career positions under a new Schedule F. It ordered the Director of OPM and agency heads to set procedures to prepare lists of such confidential, policy-determining, policymaking, or policy-advocating positions and prepare procedures to create exceptions from civil service rules when careerists hold such positions, from which they can relocate back to the regular civil service after such service. The order was subsequently reversed by President Biden at the demand of the civil service associations and unions.” [Central Personnel Agencies: Managing the Bureaucracy, Project 2025, page 80]



### Goals of Schedule F:

- (1) Installs a limitless number of political appointees without expirations dates to work within the Executive Branch as covert operatives loyal to a person or ideology.
- (2) Forces the transition of tens of thousands if not a million or more professional apolitical career federal employees into the same political appointment status without legitimate access to the Prohibited Personnel Practices (PPP) and the Merit Systems Principles (MSP) that keep government honest, transparent, accountable, and fair.
- (3) Allows the president to fire civil servants at will for political or ideological reasons.
- (4) Eliminates the competitive hiring process so that agencies can hire whomever they want for covered career positions. Project 2025 makes it clear that unquestioned loyalty to the president, as opposed to professionalism and expertise, is the only real qualification that matters.
- (5) Slashes protections for professional career federal employees threats, intimidation or political pressure.
- (6) Effectively nullifies the capability and duty of career federal employees to enforce the law or report fraud, waste, abuse, political overreach, or illegal orders.

### Impact of Schedule F:

- Undermine the ability of public servants to impartially and effectively carry out services that are critical to national security, economic stability and public safety.
- Eliminates a critical barrier to limiting the implementation of Project 2025's most egregious recommendations – the independent professional bureaucracy – making it more likely that a president could do such things as target political opponents or use government powers to reward friends. In many ways, Schedule F is the linchpin to Project 2025.
- Politicize the civil service and eliminate jobs for purely political reasons for as many as 500,000 federal workers while blocking Congress or anyone else from doing anything to stop it. “Everett Kelley, national president of the American Federation of Government Employees, which is the largest union representing federal and D.C. government workers. ‘Our union members are very worried about that.’ Kelley estimates closer to 500,000 federal workers nationwide could be at risk of losing their job for political reasons if Trump is elected and enacts the plan by executive order, which means there is nothing Congress, or anyone else could do, to stop it.” [WUSA9, [7/15/2024](#)]

### Additional Plans to Fire Civil Servants and Hire Political Loyalists

**Project 2025 proposes a variety of tools, in addition to Schedule F, that would result in civil servants being fired or laid off.** Below are some tactics a far-right administration would employ to implement this agenda.

- **The Heritage Foundation has funded an initiative to create and possibly publish a list of civil servants who do not politically align with a far-right administration to potentially fire immediately,** making it easier for extremists to carry out plans listed in Project 2025. [["Conservative-backed group is creating a list of federal workers it suspects could resist Trump plans."](#) AP News]
- **Project 2025 outlines how a far-right administration would relocate federal agencies to new locations outside of Washington, D.C. to cut the federal workforce and/or replace civil servants.** The Trump administration moved the National Institute of Food and Agriculture and the Economic Research Service out of Washington, D.C. in 2019. In response, more than half of the agencies' employees left the agencies rather than move to their new locations in the Midwest. [Central Personnel Agencies: Managing The Bureaucracy, Project 2025, p. 72]
- **Project 2025 depicts how a far-right administration would fire any federal employee who has worked on policies the new administration opposes.** [Central Personnel Agencies: Managing The Bureaucracy, Project 2025, p. 80]
- **Project 2025 details how an extremist White House would make it easier to terminate employees by shortening the disciplinary process and limiting appeals.** Project 2025

recommends reinstating Trump's order, directing agencies to shorten the disciplinary process for underperforming employees and attempting to limit the kinds of personnel actions that could be appealed, among other requirements and recommendations. [Central Personnel Agencies: Managing The Bureaucracy, Project 2025, p. 75]

- **Project 2025 lays out how a far-right president would utilize buyout programs to encourage civil servants to take early retirement.** Project 2025 argues against buyouts under certain circumstances because they are often not cost effective, particularly if a new employee is hired to replace the bought-out one. Nevertheless, following the hiring freeze in the Trump administration, OMB instructed agencies to examine the use of buyout programs, “encouraging early retirements in order to shift costs from current budgets in agencies to the retirement system and minimize the number of personnel fired. The EPA immediately implemented such a program. [Central Personnel Agencies: Managing The Bureaucracy, Project 2025, p. 78]
- **Project 2025 directs political executives to “take an active role in supervising performance appraisals of career staff.”** “Political executives should take an active role in supervising performance appraisals of career staff, not unduly delegate this responsibility to senior career managers, and be willing to reward and support good performers.” [Central Personnel Agencies: Managing the Bureaucracy, Project 2025, accessed [6/24/24](#)]
- **Project 2025 called for the next administration to begin a freeze of all top career-position hiring.** “What is needed at the beginning is a freeze on all top career-position hiring to prevent ‘burrowing-in’ by outgoing political appointees. Moreover, four factors determine the order in which employees are protected during layoffs: tenure, veterans’ preference, seniority, and performance in that order of importance.” [Central Personnel Agencies: Managing the Bureaucracy, Project 2025, accessed [6/24/24](#)]
- **Project 2025 grants political appointees a freer hand to strip away security clearances from disfavored civil servants and grant them to ill-qualified loyalists.** This risks shifting power and authority over sensitive national security decisions and intelligence assessments from apolitical professionals and experts to presidential loyalists. It would also put our national security at risk if clearances were given to people who have not been properly vetted and thus could be targeted for extortion by foreign adversaries.[Executive Office Of The President Of The United States, Project 2025, p. 52]

**Project 2025 outlines several strategies beyond Schedule F aimed at hiring ideologically-aligned civil servants.** Below are a few methods that a far-right administration would use to achieve this goal.

- **Project 2025 has established a personnel database to screen people who would like to be considered for positions during a future administration.** Registration for this [database](#) includes a questionnaire, which evaluates candidates through ideologically biased questions like “Name one person, past or present, who has most influenced the development of your political philosophy.” [[“Behind the Curtain — Scoop: The Trump job applications revealed.”](#) Axios]
- **Project 2025 describes how a far-right president would change hiring requirements for federal civil servants to include a discriminatory IQ exam.** Project 2025 proposes utilizing legislative or regulatory processes — including through the Office of Personnel Management — to reinstate the usage of general intelligence tests, which have not been in use since the Carter administration. At the time, civil rights groups contended that the general intelligence exam (the Professional and Administration Career Exam, or PACE) used to hire for certain agency positions was discriminatory. After a class action lawsuit alleging employment discrimination led to a consent decree, Carter administration officials abolished the use of the exam for hiring. [Central Personnel Agencies: Managing The Bureaucracy, Project 2025, p. 72]
- **Project 2025 depicts how a far-right president would implement a hiring freeze at agencies across the federal government, shrinking the size and efficacy of the civil service.** Project 2025 states: “What is needed at the beginning is a freeze on all top career-position hiring to prevent ‘burrowing-in’ by outgoing political appointees.” [Central Personnel Agencies: Managing The Bureaucracy, Project 2025, p. 79]

## Attacks on Public Sector Unions

**Project 2025 said the next administration should reinstate Trump EOs that: Encouraged agencies to renegotiate all union CBAs, encouraged agencies to prevent union representatives from using official time to prepare or pursue grievances, and one encouraging agencies to limit labor grievances on removals from service or on challenging performance appraisals.** “Rather than being daunted, President Trump issued three executive orders: I Executive Order 13836, encouraging agencies to renegotiate all union collective bargaining agreements to ensure consistency with the law and respect for management rights;<sup>26</sup> I Executive Order 13837, encouraging agencies to prevent union representatives from using official time preparing or pursuing grievances or from engaging in other union activity on government time;<sup>27</sup> and I Executive Order 13839, encouraging agencies both to limit labor grievances on removals from service or on challenging performance appraisals and to prioritize performance over seniority when deciding who should be retained following reductions-in-force.<sup>28</sup> All were revoked by the Biden Administration<sup>29</sup> and should be reinstated by the next Administration, to include the immediate appointment of the FLRA General Counsel and reactivation of the Impasses Panel.” [Central Personnel Agencies: Managing the Bureaucracy, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for Congress to reconsider if public sector unions are “appropriate.”** “Congress should also consider whether public-sector unions are appropriate in the first place. The bipartisan consensus up until the middle of the 20<sup>th</sup> century held that these unions were not compatible with constitutional government.<sup>30</sup> After more than half a century of experience with public-sector union frustrations of good government management, it is hard to avoid reaching the same conclusion.” [Central Personnel Agencies: Managing the Bureaucracy, Project 2025, accessed [6/24/24](#)]

## Politicization of Grantmaking

“OIRA should also work with other components of OMB to revise and apply OMB’s uniform Guidance for Grants and Agreements<sup>22</sup> and ensure that federal contract and grant guidelines satisfy EO 12866 and other centralized standards as appropriate.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposes using OFPP grants to punish federal contractors who engage in DEI/ESG policies or programs.** “OFPP helps the Director to set a wide range of policies for all of those who contract with the executive branch. In the past, those governmentwide contracting rules have played a key role in helping to implement the President’s policy agenda. This office should be engaged early and often in OMB’s effort to drive policy, including by obtaining transparency about entities that are awarded federal contracts and grants and by using government contracts to push back against woke policies in corporate America. [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 looks to cut grants across government as a means of cutting employees and programs.** “In addition, millions of state government employees work under federal grants, in effect administering federal programs; these cannot be cut directly. Cutting federal employment can be helpful and can provide a simple story to average citizens, but cutting functions, levels, funds, and grants is much more important than setting simple employment size.” Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposes conditioning FEMA grants/funding on compliance with Administration immigration and data reporting priorities.** The Secretary should direct FEMA to ensure that all FEMA-issued grant funding for states, localities, and private organizations is going to recipients who are lawful actors, can demonstrate that they are in compliance with federal law, and can show that their mission and actions support the broader homeland security mission. [...] Certification by applicants that they comply with all aspects of federal immigration laws, including the honoring of all immigration detainees. [...] If the applicant is a state or locality, commitment by that state or locality to total information-sharing in the

context of both federal law enforcement and immigration enforcement. This would include access to department of motor vehicles and voter registration databases.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 specifies aligning the Office of Strategy, Policy, and Plans (PLCY) to the President’s agenda.** “The department has significant authority and budget to provide grants for various purposes. This effort is diffused across components and lacks central policy thought and coordination. PLCY should set a department wide policy that establishes how granting choices are to be made and is consistent with the President’s priorities. PLCY should clear all granting decisions to ensure that they are consistent with the new policy.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 calls for eradicating LGBTQ and reproductive health language from all USAID materials and grants.** “In addition, the next conservative Administration should rescind President Biden’s 2022 Gender Policy and refocus it on Women, Children, and Families and revise the agency’s regulation on “Integrating Gender Equality and Female Empowerment in USAID’s Program Cycle.”<sup>10</sup> It should remove all references, examples, definitions, photos, and language on USAID websites, in agency publications and policies, and in all agency contracts and grants that include the following terms: “gender,” “gender equality,” “gender equity,” “gender diverse individuals,” “gender aware,” “gender sensitive,” etc. It should also remove references to “abortion,” “reproductive health,” and “sexual and reproductive rights” and controversial sexual education materials.” [Agency for International Development, Project 2025, accessed [6/24/24](#)]

**Project 2025 calls for aligning international aid grant funding to anti-abortion policies of the Administration.** “The next conservative Administration should immediately implement language on key policy topics as standard provisions in all grants, cooperative agreements, and contracts. These provisions should include language on implementing the Policy on Protecting Life in Foreign Assistance, imposing conditions on funding to multilateral organizations, and increasing accountability and transparency.” [Agency for International Development, Project 2025, accessed [6/24/24](#)]

**Project 2025 directs the Teen Pregnancy Prevention (TPP) and Personal Responsibility Education Program (PREP) to prioritize grant-making to abstinence-only programs.** [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 prescribes block granting federal education funding to states and requiring that families be allowed to spend that funding on private school tuition.** “To the extent that federal taxpayer dollars are used to fund education programs, those funds should be block-granted to states without strings, eliminating the need for many federal and state bureaucrats. Eventually, policymaking and funding should take place at the state and local level, closest to the affected families. [...] **Restoring state and local control over education funding.** As Washington begins to downsize its intervention in education, existing funding should be sent to states as grants over which they have full control, enabling states to put federal funding toward any lawful education purpose under state law.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 details potential education grant funding to be “rolled back or eliminated.”** “There are five primary regulatory targets (as of December 2022) that require the next Administration’s attention: regulations on (1) Charter School Grant Program Priorities; (2) Civil Rights Data Collection; (3) Student Assistance General Provisions, Federal Perkins Loan Program, and William D. Ford Federal Direct Loan Program Final Regulations; (4) Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance (Title IX); and (5) Assistance to States for the Education of Children with Disabilities, Preschool Grants for Children with Disabilities (Equity in IDEA).” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 calls for investigating, prosecuting, and restricting foreign grants to universities.** “Investigate postsecondary institutions that fail to honor their Section 117 obligations and make appropriate referrals to DOJ. Work with Congress to amend the HEA to tie the HEA’s foreign source

reporting requirements to an institution's ability to receive federal financial assistance, particularly participation in programs funded under Titles IV and VI of the HEA.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants to partially defund public education with significant grant and funding cuts.**

**“Eliminate competitive grant programs and reduce spending on formula grant programs.**

Competitive grant programs operated by the Department of Education should be eliminated, and federal spending should be reduced to reflect remaining formula grant programs authorized under Title I of the Elementary and Secondary Education Act (ESEA) and the handful of other programs that do not fall under the competitive/ project grant category. Remaining programs managed by the Department of Education, such as large formula grant programs for K–12 education, should be reduced by 10 percent. This would cut approximately 29 programs, most of which are discretionary spending. In total, this would generate approximately \$8.8 billion in savings.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 plans to defund climate-related energy and infrastructure grants and programs, including Grid Deployment Office grants. “Defund most GDO programs.** GDO oversees nearly \$20 billion in new appropriations created by the IIJA, including a grid modernization grant program, the transmission facilitation program, and the civil nuclear credit program, among others. Congress should rescind any money not already spent. [Department of Energy, Project 2025, accessed [6/24/24](#)]

**Project 2025 would eliminate OCED grant funding and investment that catalyzes clean energy innovation and technology. “End market distortions and stop shifting technology and development risks to taxpayers.** The OCED is distorting energy

markets and shifting the risk of new technology deployment from the private sector to taxpayers. The IIJA provided more than \$20 billion in government subsidies to help the private sector deploy and market clean energy and decarbonizing resources.” [Department of Energy Project 2025, accessed [6/24/24](#)]

**Project 2025 seeks to repeal the Inflation Reduction Act and all of its grant funding.** “Repeal Inflation Reduction Act programs providing grants for environmental science activities.” [Environmental Protection Agency, Project 2025, accessed [6/24/24](#)]

**Project 2025 would stop all grants to environmental/climate advocacy groups.** “Grants. Stop all grants to advocacy groups[...].” [Environmental Protection Agency, Project 2025, accessed [6/24/24](#)]

**Project 2025 seeks to re-route IRA funding to states, including those who deny climate change and support fossil fuel extraction.** “To the extent that the Inflation Reduction Act (IRA)18 remains in place, ensure to the maximum extent possible that grants and funding are provided to state regulatory entities and not to nonprofits.” [Environmental Protection Agency, Project 2025, accessed [6/24/24](#)]

**Project 2025 calls for using the SCOTUS anti-race-conscious admissions verdict to prohibit all environmental justice-related grant making.** “Allocations of agency resources, increased EPA enforcement, and/or agency distribution of grants should be based on neutral constitutional principles. In 2023, the Supreme Court is expected to provide guidance on the constitutionality of race-based discrimination as it considers *Students for Fair Admissions v. University of North Carolina*.<sup>54</sup> Accordingly, the next Administration should pause and review all ongoing EJ and Title VI actions to ensure that they are consistent with any forthcoming SCOTUS decision.” [Environmental Protection Agency, Project 2025, accessed [6/24/24](#)]

**Project 2025 plans to halt grant-making to universities and institutions involved in climate research.** “Steps should be taken to ensure that grants are awarded based on need instead of ideological affiliation or academic preference. Specifically, EPA should: Institute a pause and review for all grants over a certain threshold. Put a political appointee in charge of the grants office to prioritize distribution of grants to those who are most in need and toward projects that will tangibly improve the environment. Cap the number and dollar amounts of grants that the Office of Research and Development can award and

require that they be reviewed by the Administrator's office." [Environmental Protection Agency, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposes politicizing and in some cases ending, NIH grants, and calls for states to control scientific research.** "Term limits should be imposed on top career leaders at the NIH, and Congress should consider block granting NIH's grants budget to states to fund their own scientific research. Nothing in this system would prevent several states from partnering to co-fund large research projects that require greater resources or impact larger regions. Likewise, the establishment of funding for scientific research at the state level does not preclude more modest federal funding through the National Institutes of Health: The two models are not mutually exclusive." [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 would remove preference given to evidence-based comprehensive sex education programs, instead favoring "Sexual Risk Avoidance" and "family planning" methods that hinge on abstinence-only sex education.** "Any lists with "approved curriculum" or so-called evidence-based lists should be abolished; HHS should not create a monopoly of curriculum, adding to the profit of certain publishers." "CMS should ensure that Sexual Risk Avoidance (SRA) proponents receive these grants and are given every opportunity to prove their effectiveness. SRA programs, both at ACF and at OASH and both discretionary and mandatory, should be equal in funding and emphasis. Qualitative research should be conducted on both types of programs to ensure continuous improvement. In addition, certain provisions should be employed so that these programs do not serve as advocacy tools to promote sex, promote prostitution, or provide a funnel effect for abortion facilities and school field trips to clinics, or for similar purposes. Parent involvement and parent-child communication should be encouraged and be a part of any funded project. Risk avoidance should be prioritized, and any program that submits a proposal that promotes risk rather than health should not be eligible for funding." [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 calls for allocating grant funding to anti-LGBTQ faith groups.** "HMRE [Healthy Marriage and Relationship Education] program grants should be available to faith-based recipients who affirm that marriage is between not just any two adults, but one man and one unrelated woman." [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposes amending the Title X family planning program and its grants to fund anti-abortion providers while defunding reproductive health providers including Planned Parenthood.** "Title X. The Title X family planning program should be reframed with a focus on better education around fertility awareness and holistic family planning and a Deputy Assistant Secretary for Population Affairs that understands the program and is able to work within its legislative framework (ideally, an MD). In addition, the Office of Population Affairs should eliminate religious discrimination in grant selections and guarantee the right of conscience and religious freedom of health care workers and participants in the Title X program.

In 2021, HHS reversed a Trump Administration regulation that required grantees to maintain strict physical and financial separation between Title X activity and abortion-related activity.<sup>76</sup> Under the Biden Administration's regulation,<sup>77</sup> Title X activity can be conducted alongside abortion activity without strict physical and financial separation. The regulation also requires grantees to refer for abortions despite sincere moral or religious objections. This effectively bans otherwise qualified pro-life grantees from participating in the program.

HHS should rescind the Biden Administration's regulation and reinstate the Trump Administration regulation for the program. It should also do this quickly (the Biden Administration completed its regulatory process and issued a final rule in less than nine months) and expand the potential grantee population beyond abortion providers like Planned Parenthood.

Congress should complement these efforts by passing legislation such as the Title X Abortion Provider Prohibition Act,<sup>78</sup> which would prohibit family planning grants from going to entities that perform abortions or provide funding to other entities that perform abortions. This would help to protect the integrity of the

Title X program even under an abortion-friendly Administration.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposes using Office of Justice Programs grants to bolster the President’s prosecutorial agenda.** “Ensuring Proper Distribution of DOJ Grant Funds. DOJ grants are an underutilized asset in most conservative Administrations. When used properly, they can be highly effective in implementing the President’s priorities. The Office of Justice Programs (OJP) is comprised of six components and is responsible for most DOJ grants to local law enforcement, juvenile justice, and victims of crime as well as for criminal justice research and statistics. The opportunity to support a President’s agenda may be greater through OJP grant funding than it is through any of the federal government’s other grant-making components. [Department of Justice, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants to shift Federal Department of Transportation grants to the states to spend as they wish.** “If funding must be federal, it would be more efficient for the U.S. Congress to send transportation grants to each of the 50 states and allow each state to purchase the transportation services that it thinks are best. Such an approach would enable states to prioritize different types of transportation according to the needs of their citizens. States that rely more on automotive transportation, for example, could use their funding to meet those needs. [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 calls for abolishing \$350M of Public Works Grants from the Economic Development Administration’s portfolio, and for redistributing its funding to other priorities.** “Rather than implementing the new Department Organization Orders required to put conservative governance in place, it would be more efficient to abolish EDA and reallocate its funding to other overlapping federal grant programs.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 calls for ending cash grants to small businesses.** “An end to SBA direct lending.” “For example, and more recently, more than \$1 trillion in COVID-19 relief was distributed through the SBA.<sup>4</sup> The SBA’s EIDL (Economic Injury Disaster Loan) Advance program in particular shows the dangers that can come with direct government lending. EIDL Advance provided direct cash grants and loans to small businesses. The SBA Office of Inspector General “identified \$78.1 billion in potentially fraudulent EIDL loans and grants paid to ineligible entities,”<sup>5</sup> which represented more than half of all funds spent through the program. Although PPP worked through private lenders and as a result experienced relatively less fraud than EIDL experienced, it is estimated “that at least 70,000 [PPP] loans were potentially fraudulent.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

## **Obstruction of Congressional Oversight and Balance of Powers**

**Project 2025 outlines that the administration can manipulate the Federal Vacancies Reform Act to install political appointees in key agency leadership positions across the federal government.** The practical effect of this gambit is to enable politically loyal personnel to carry out official agency business, all without being subjected to the lengthy, and potentially embarrassing, Senate confirmation process. [“The Blueprint.” American Prospect]

“At the highest level, PPO is tasked with long-term, strategic workforce development. The “billets” of political appointments are of immense importance in credentialing and training future leaders. In addition, whatever one’s view of the constitutionality of various civil service rules (for example, the Federal Vacancies Reform Act of 19986) might be, it is necessary to ensure that departments and agencies have robust cadres of political staff just below senior levels in the event of unexpected vacancies.” [White House Office, Project 2025, accessed [6/24/24](#)]

**Project 2025 seeks to short-circuit congressional oversight of the Department of Homeland Security by establishing greater presidential control over communications between the agency and committees of jurisdictions with congress,** with the apparent aim of controlling the flow of information that members of Congress and their staff receive. Specifically, it calls for the president to

demand that only one committee in each chamber serve as an authorizing committee. If congressional leadership refuses to accept this arrangement, then it recommends that the agency's Office of Legislative Affairs select one and restrict its communications to only that committee. "Only political appointees in OLA should interact directly with congressional staff on all inquiries, including budget and appropriations matters. To prevent congressional staff from answer shopping among HQ OLA, the DHS OCFO, and components, DHS legislative affairs appropriations staff should be moved from MGMT OCFO into OLA. Regarding components, budget/appropriations staff should move from component budget offices into component legislative affairs offices.

"In both OPA and OLA, a change in mission and culture is needed. The clients of both components are the President and the Secretary, not the media, external organizations, or Congress. OPA and OLA should change from being compliance correspondents for outside entities airing grievances to serving as messengers and advocates for the President and the Secretary." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025's chapter on the Department of State short-circuits congressional oversight by establishing greater presidential control over communications between the agency and committees of jurisdictions with Congress.** Specifically, it recommends deferring to the White House on certain communications with Congress. In practice, that means for affected issues of agency business, any discussions between Congress and the agency would have to be channeled through the White House. "The department must therefore take particular care in its interaction with Congress, since poor interactions with Congress, regardless of intentions, could trigger congressional pushback or have other negative impacts on the President's agenda.

This will require particularly strong leadership of the Department of State's Bureau of Legislative Affairs. The Secretary of State and political leadership should ensure full coordination with the White House regarding congressional engagement on any State Department responsibility. This may lead to, for example, the President authorizing the State Department to engage with Members of Congress and relevant committees on certain issues (including statutorily designated congressional consultations), but to remain "radio silent" on volatile or designated issues on which the White House wants to be the primary or only voice. All such authorized department engagements with Congress must be driven and handled by political appointees in conjunction with career officials who have the relevant expertise and are willing to work in concert with the President's political appointees on particularly sensitive matters." [Department of State, Project 2025, accessed [6/24/24](#)]

### **Place Independent Agencies Under Direct Control of the President.**

**Project 2025 weakens federal independent agencies by placing them under the direct control of the president.** "In addition to the executive departments and agencies discussed previously, a number of independent commissions exist that are loosely affiliated with the executive branch. In general, the President can appoint people to these commissions but cannot remove them, which makes them constitutionally problematic in light of the Constitution's having vested federal executive power in the President. Nevertheless, they exist, their constitutional legitimacy has generally been upheld by the courts, and there will be an opportunity for the next Administration to use them as forces for good, particularly by making wise appointments." [p. 825]

**Project 2025 uses FTC as an example to make the case for revisiting *Humphrey's Executor*, the Supreme Court case that upheld removal protections for commissioners of multi-member agencies, saying: "until there is a return to a constitutional structure that the Founding Fathers would have recognized and a massive shrinking of the administrative state, conservatives cannot unilaterally disarm and fail to use the power of government to further a conservative agenda."**

"The FTC's commissioners are not removable at will by the President, which many quite reasonably believe violates the Vesting Clause of the Constitution; it is for this reason that conservatives have long believed in either ending law enforcement activities of independent agencies or ending their independent status. The Supreme Court ruling in *Humphrey's Executor* upholding agency independence seems ripe for revisiting—and perhaps sooner than later. Others think that the post–New Deal expansion of the



administrative state has had baleful effects upon our society and earnestly share the hope that it can be greatly curtailed if not eliminated—or that its authority can be returned to the states and other democratically accountable political institutions.” But, until there is a return to a constitutional structure that the Founding Fathers would have recognized and a massive shrinking of the administrative state, conservatives cannot unilaterally disarm and fail to use the power of government to further a conservative agenda. As experience shows, the administrative state will grow and further its own agenda, often at odds with conservative thought, even under conservative leadership. Unless conservatives take a firm hand to the bureaucracy and marshal its power to defend a freedom-promoting agenda, nothing will stop the bureaucracy’s anti-free market, leftist march.” [p. 872-73]

- **FTC:** goes through a range of potential mission/program reforms but admits that not all conservatives agree: “Many, but not all, conservatives believe that these developments may warrant the FTC’s making a careful recalibration of certain aspects of antitrust and consumer protection law and enforcement.” [p. 869]

**Project 2025 would extend OMB OIRA oversight and review of independent agencies.** “OMB’s OIRA plays an enormous and vital role in reigning in the regulatory state and ensuring that regulations achieve important benefits while imposing minimal burdens on Americans. The President should maintain Executive Order (EO) 12866, the foundation of OIRA’s review of regulatory actions. The Administration should likewise maintain the recent extension of those standards to regulatory actions of the U.S. Department of the Treasury. Regulatory analysis and OIRA review should also be required of the historically “independent” agencies as the Office of Legal Counsel has found is legally permissible. ... The next President should also revive the directive in Executive Order 13891 that significant guidance documents also must pass through OIRA review.” [p. 49-50]

#### Other examples:

- **FCC:** “Trump intends to replace that independent process with one where he has direct authority and can more readily manipulate the applicable standards. That critical step would allow him to direct the FCC’s regulatory powers, as he has promised, against media companies like MSNBC and its parent company, NBCUniversal, along with others that he has labeled as the “enemy of the people” that “should pay a big price” for coverage critical of him.” [Not in Project 2025 explicitly but is laid out in Trump policy videos; United to Protect Democracy, Authoritarian Playbook, [January 2024](#)]
  - “Under a tradition that dates back a few decades, when a relevant vacancy arises, the President allows the leader of the opposite political party in the Senate to select the person who will serve in the minority Commissioner role. The President then formally nominates the person identified by Senate leadership. This also is not required by law.” [Federal Communications Commission, Project 2025, accessed [6/24/24](#)]
- **FEC:** “With only five commissioners, three members of the same political party could control the enforcement process of the agency, raising the potential of a powerful federal agency enforcing the law on a partisan basis against the members of the opposition political party. Efforts to impose a “nonpartisan” or so-called “independent” chair are impractical; the chair will inevitably be aligned with his or her appointing party, at least as a matter of perception.” [p. 866]
- **CFPB:** Want to eliminate it, calling it “unconstitutional.” And if it can’t do that, it proposes to limit its authorities. “The CFPB is a highly politicized, damaging, and utterly unaccountable federal agency. It is unconstitutional. Congress should abolish the CFPB and reverse Dodd–Frank Section 1061, thus returning the consumer protection function of the CFPB to banking regulators and the Federal Trade Commission. Provided the Supreme Court affirms the Fifth Circuit holding in Community Financial Services Association of America, the next conservative President should order the immediate dissolution of the agency—pull down its prior rules, regulations and guidance, return its staff to their prior agencies and its building to the General Services Administration.” [p. 837-838]
  - The president should remove CFPB director: “In *Seila Law LLC v. Consumer Financial Protection Bureau*, the Supreme Court of the United States held that the CFPB’s leadership by a single individual removable only for inefficiency, neglect, or malfeasance violated constitutional separation of powers requirements because “[t]he Constitution

requires that such officials remain dependent on the President, who in turn is accountable to the people.” The CFPB Director is thus subject to removal by the President.” [p. 837-838]

- NOTE: The Supreme Court in May 2024 [upheld the structure of the CFPB](#).
- **EEOC and NLRB:** as mentioned above...
  - **Project 2025 said EEOC and NLRB should have new general counsels appointed on Day One.** “Appoint new EEOC and NLRB general counsels on Day One. The Biden Administration broke significant precedent by firing the EEOC and NLRB general counsels despite their term appointments. The next Administration should do the same and expand on the Biden Administration’s new precedent by refusing to acknowledge terms in other offices, where applicable, and installing acting or full new officers immediately.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]
  - **Project 2025 said EEOC “should disclaim its regulatory pretensions” since it does not have rulemaking authority under Title VII and other laws it enforces.** “General EEOC Reforms. The Equal Employment Opportunity Commission (EEOC) does not have rulemaking authority under Title VII and other laws it enforces, yet it issues ‘guidance,’ ‘technical assistance,’ and other documents, including some that push new policy positions. EEOC should disclaim its regulatory pretensions and abide by the guidance reforms discussed below.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]
  - **Project 2025 said “EEOC should disclaim power to enter into consent decrees that require employer actions that it could not require under the laws it enforces.** “Disclaim power to enter into consent decrees. EEOC should disclaim power to enter into consent decrees that require employer actions that it could not require under the laws it enforces.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]
  - **Project 2025 recommended EEOC reorient its enforcement priorities towards “failure to accommodate disability, religion and pregnancy (but not abortion).”** “Reorient enforcement priorities. EEOC should reorient its enforcement priorities toward claims of failure to accommodate disability, religion, and pregnancy (but not abortion).” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]
  - **Project 2025 called for increasing revenue thresholds at which the NLRB asserts jurisdiction over employers.** “Congress should enact legislation increasing the revenue thresholds at which the National Labor Relations Board asserts jurisdiction over employers to match changes in inflation that have occurred since 1935 and better reflect the definition of ‘small business’ used by the federal government.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

### **Eliminates and/or Politicizes Executive Branch Agencies in Whole or in Part**

Project 2025 has been called a blueprint for autocracy, because, among its radical proposals, it promotes an extreme version of the doctrine of ‘unitary executive unitary theory’ (UET). In short, UET as promoted by Project 2025 and supported by the Supreme Court in its recent decision regarding presidential immunity, seeks to install a president with unprecedented power. Project 2025 writes that the president has absolute authority over the Executive Branch and its employees, including the military.

Project authors believe that a president is not subject to the laws of congress, and the president has no duty to report or follow the mandates ordered by congress even though the Constitution clearly states otherwise. Critical to absolute control of the Executive Branch is creating “an army” of presidential loyalists who will evade congress and the courts to exploit federal laws and regulations. This authority is

referred to as Schedule F, wherein hundreds of thousands of federal employees will be converted over to apolitical status and lose their civil service protections, making them vulnerable to the whims of Project 2025 loyalists operatives from within and outside of government.

In the introduction, Project 2025's authors write, "In order to carry out the President's desires, political appointees must be given the tools, knowledge, and support to overcome the federal government's obstructionist Human Resources departments. More fundamentally, the new Administration must fill its ranks with political appointees." (pg. 20)

The rest of this subject-by-summary will break down in more detail how Project 2025 plans to take over, eliminate or politicize what currently are nonpolitical functions of government impacting every part of your life. For now, here are a few brief examples of how Project 2025 plans to centralize total power and control within each federal agency.

#### **National Security Council:**

- Empowers a strong National Security Council that "is entrusted with the full power of the presidency to drive the bureaucracy... The President should empower a strong NSC that not only has the power to convene the policy process, but also is entrusted with the full power of the presidency to drive the bureaucracy." [Executive Office of the President of the United States]

#### **Department of Education:**

- Eliminates the Department of Education and moves its Office of Civil Rights to DOJ. "OCR should move to the Department of Justice. The federal government has an essential responsibility to enforce civil rights protections, but Washington should do so through the Department of Justice and federal courts. The OCR at DOJ should be able to enforce only through litigation." [Department of Education].

#### **Department of Justice:**

- Limits the independence of the Department of Justice and Federal Bureau of Investigation to politicize law enforcement and weaponize the justice system to serve only the will of the president and the Project 2025 administration.

#### **Department of Health and Human Services:**

- Remakes the entire agency so that a Project 2025 Administration can unilaterally advance its radical priorities:
  - "HHS should return to being known as the Department of Life by explicitly rejecting the notion that abortion is health care and by restoring its mission statement under the Strategic Plan and elsewhere to include furthering the health and well-being of all Americans 'from conception to natural death.'"
  - "Families comprised of a married mother, father, and their children are the foundation of a well-ordered nation and healthy society. Unfortunately, family policies and programs under President Biden's HHS are fraught with agenda items focusing on 'LGBTQ+ equity,' subsidizing single-motherhood, disincentivizing work, and penalizing marriage. These policies should be repealed and replaced by policies that support the formation of stable, married, nuclear families."
  - Require surveillance by the federal government of every woman's pregnancy: "The CDC's abortion surveillance and maternity mortality reporting systems are woefully inadequate. CDC abortion data are reported by states on a voluntary basis, and California, Maryland, and New Hampshire do not submit abortion data at all. Accurate and reliable statistical data about abortion, abortion survivors, and abortion-related maternal deaths are essential to timely, reliable public health and policy analysis. Because liberal states have now become sanctuaries for abortion tourism, HHS should use every available tool, including the cutting of funds, to ensure that every state reports exactly how many abortions take place within its borders, at what gestational age of the child, for what reason, the mother's state of residence, and by what method. It should

also ensure that statistics are separated by category: spontaneous miscarriage; treatments that incidentally result in the death of a child (such as chemotherapy); stillbirths; and induced abortion. In addition, CDC should require monitoring and reporting for complications due to abortion and every instance of children being born alive after an abortion. Moreover, abortion should be clearly defined as only those procedures that intentionally end an unborn child's life. Miscarriage management or standard ectopic pregnancy treatments should never be conflated with abortion."

#### **Department of Labor:**

- **Project 2025 aims to fill the ranks of DOL with loyalists.** "Maximize hiring of political appointees. At its best, the Trump Administration Department of Labor worked with up to 150 political appointees. That is still a tiny percentage of the department. The number of political appointees should be maximized in order to improve the political accountability of the department."

#### **NOAA:**

- **Project 2025 calls for the dismantling of NOAA** with "many of its functions eliminated, sent to other agencies, privatized, or placed under the control of states and territories...The National Oceanographic and Atmospheric Administration (NOAA) should be dismantled and many of its functions eliminated, sent to other agencies, privatized, or placed under the control of states and territories." [Department of Commerce, Project 2025]
- **Project 2025 recommends NOAA "be broken up and downsized."** "Together, these form a colossal operation that has become one of the main drivers of the climate change alarm industry and, as such, is harmful to future U.S. prosperity. This industry's mission emphasis on prediction and management seems designed around the fatal conceit of planning for the unplannable. That is not to say NOAA is useless, but its current organization corrupts its useful functions. It should be broken up and downsized."
- **Project 2025 calls for privatizing NOAA's functions.** "[...] could be provided commercially, likely at a lower cost and higher quality." "NOAA today boasts that it is a provider of environmental information services, a provider of environmental stewardship services, and a leader in applied scientific research. Each of these functions could be provided commercially, likely at lower cost and higher quality."

#### **Department of Commerce:**

- **Project 2025 details disbanding, eliminating, or privatizing functions of the Department of Commerce.** "Many programs at the Department of Commerce overlap in whole or part with other governmental programs, and consolidating and streamlining these could increase both accountability and return on taxpayer investment. Any exercise in government-wide budgeting and reform should review the department with an eye toward consolidation, elimination, or privatization that examines the efficiency, effectiveness, and underlying philosophy of each individual component."
- **Census Bureau:** "Appointed staff should be in place at the Bureau as early as feasible after a new President takes office. This will require the Office of Personnel Management to allocate additional political appointee positions to the Census Bureau." "Strong political leadership is needed to increase efficiency and align the Census Bureau's mission with conservative principles. Personnel is key to ensuring that a new Administration can guide preparations for the 2030 census and oversee the continued operation of the Bureau's many surveys. To move bureaucracy on key priorities, appointed staff should be in place at the Bureau as early as feasible after a new President takes office. This will require the Office of Personnel Management to allocate additional political appointee positions to the Census Bureau."

#### **Department of Homeland Security:**

- Dismantles much of the existing agency, privatizes the TSA, removes all DHS unions, and circumvents Senate confirmation proceedings for top political officials:
  - "Our primary recommendation is that the President pursue legislation to dismantle the Department of Homeland Security (DHS). After 20 years, it has not gelled into 'One

DHS.’ Instead, its various components’ different missions have outweighed its decades-long attempt to function as one department, rendering the whole disjointed rather than cohesive. Breaking up the department along its mission lines would facilitate mission focus and provide opportunities to reduce overhead and achieve more limited government.”

- Claims DHS functions would improve if the next Secretary had their own dedicated team of political appointees selected and vetted by OPP. “Expansion of Dedicated Political Personnel. The Secretary of Homeland Security is a presidentially appointed and Senate-confirmed political appointee, but for budgetary reasons, he or she has historically been unable to fund a dedicated team of political appointees. A key first step for the Secretary to improve front-office functions is to have his or her own dedicated team of political appointees selected and vetted by the Office of Presidential Personnel, which is not reliant on detailees from other parts of the department, to help ensure the completion of the next President’s agenda.” [Department of Homeland Security]
- Privatizes TSA (Transportation Security Administration). Project 2025 (pages 158-59).
- Circumvents Senate confirmation positions by placing its nominees in key positions into similar positions as “Actings.” “An Aggressive Approach to Senate-Confirmed Leadership Positions. While Senate confirmation is a constitutionally necessary requirement for appointing agency leadership, the next Administration may need to take a novel approach to the confirmations process to ensure an adequate and rapid transition. For example, the next Administration arguably should place its nominees for key positions into similar positions as ‘actings’ (for example, putting in a person to serve as the Senior Official Performing the Duties of the Commissioner of CBP while that person is going through the confirmation process to direct ICE or become the Secretary). This approach would both guarantee implementation of the Day One agenda and equip the department for potential emergency situations while still honoring the confirmation requirement.” Project 2025 (page 136).
- Recommends restructuring and redistributing career personnel in the department: “Restructuring and Redistribution of Career Personnel. To strengthen political decision-making and ensure that taxpayer dollars are being used legally and efficiently, the Secretary should make major changes in the distribution of career personnel throughout the department. For example, personnel from parts of the department undergoing soft closure could be redistributed to what will be workload-intensive corners of the department, including national security–critical and transparency functions. All personnel with law enforcement capacity should be removed immediately from office billets and deployed to field billets to maximize law enforcement capacity.” Project 2025 (page 137)

#### **Department of Veterans Affairs:**

- Undermines whistleblower protections: “Work with Congress to sunset the Office of Accountability and Whistleblower Protection (OAWP). OAWP was well intentioned when formed, but it is redundant with the activities of supervisors as well as equal employment opportunity, Office of the Inspector General, Office of Special Counsel, and other policies, programs, and procedures for holding employees accountable. This redundancy results in lengthy investigations, gaps in coverage, and an overall ineffective method of employee and supervisor accountability.”

#### **Environmental Protection Agency:**

- Disbands multiple parts of the EPA, including Office of Environmental Justice and External Civil Rights, Office of Enforcement and Compliance Assistance. [
  - Makes the drastic reduction of the EPA’s size and scope, with a focus on “compliance over enforcement” a topline priority.
  - Downsizes and dismantles key programs that protect public health and the environment, with dire consequences for environmental justice.
    - Prevents the distribution of billions of dollars in IRA climate investments that combat the climate crisis and strengthen community resilience, severely limit and filter scientific research on climate modeling and development of mitigation strategies.

- Guts EPA authority and oversight of air and water pollution, rid polluters and other entities of environmental accountability.
- Prevents the reduction in millions of metric tons of GHGs and legacy pollution in communities across the nation.
- Provides legal grounds to completely topple Justice40 and other environmental justice programs within the EPA and likely across other agencies.
- Day One Executive Order to slash EPA's capabilities and weaken its rules.
- Most broadly, the plan would downsize EPA by cutting the budget, staff and programs, and "pause and review" major rules and guidance that protect the environment and public health, in order to weaken those protections.

#### **Department of Housing and Urban Development:**

- Plans for "devolving many HUD functions to states and localities with any remaining federal functions consolidated to other federal agencies." "Finally, and more fundamentally, Congress could consider a wholesale overhaul of HUD that contemplates devolving many HUD functions to states and localities with any remaining federal functions consolidated to other federal agencies (for example, by transferring loan guarantee programs to SBA; moving Indian housing programs to the Department of the Interior; moving rental assistance, mortgage insurance programs, and GNMA to a redesignated Housing and Home Finance Agency). Generally, this reform path could consolidate some programs, eliminate others that have failed to produce meaningful long-run results, and narrow the scope of many programs so that they are closer to what they were when they were created."
- Calls on HUD to politicize the department by "immediately" appointing political appointees to various leadership positions. "HUD political leadership should immediately assign all delegated powers to politically appointed PDAS, DAS, and other office leadership positions; change any current career leadership positions into political and non-career appointment positions; and use Senior Executive Service (SES) transfers to install motivated and aligned leadership."

#### **Federal Reserve:**

- Calls for drastically overhauling the Federal Reserve's role in stabilizing the economy: "In essence, because of its vastly expanded discretionary powers with respect to monetary and regulatory policy, the Fed lacks both operational effectiveness and political independence. To protect the Federal Reserve's independence and to improve monetary policy outcomes, Congress should limit its mandate to the sole objective of stable money." Project 2025 (page 732).
- Recommends the Economic Development Agency be abolished and that its funding be reallocated to overlapping federal grant programs. "Rather than implementing the new Department Organization Orders required to put conservative governance in place, it would be more efficient to abolish EDA and reallocate its funding to other overlapping federal grant programs."

### **Changes to the Executive Office of the President**

**Project 2025 urged the next president to hire a White House Counsel who "will be above all loyal to the President and the Constitution."** "The President should choose a White House Counsel who is well-versed in the Constitution, administrative and regulatory law, and the inner workings of Congress and the political process. Instead of choosing a specialist, the President should hire a counsel with extensive experience with a wide range of complex legal subjects. Moreover, while a candidate with elite credentials might seem ideal, the best one will be above all loyal to the President and the Constitution." [White House Office, Project 2025, accessed [6/24/24](#)]

**Project 2025: "No legal entitlement exists for the provision of permanent space for media on the White House campus, and the next Administration should reexamine the balance between media demands and space constraints on the White House premises."** "Operational functions of the Office of Communications include scheduling and running press briefings, interviews, meetings, media

appearances, speeches, and a range of other events. The Office of Communications must maintain robust relationships with the White House Press Corps, the White House Correspondents' Association, regional stakeholders, and key interest groups. No legal entitlement exists for the provision of permanent space for media on the White House campus, and the next Administration should reexamine the balance between media demands and space constraints on the White House premises." [White House Office, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged abolishing the Gender Policy Council, which they say “would eliminate central promotion of abortion (‘health services’); comprehensive sexuality education (‘education’); and the new woke gender ideology.”** “The President should immediately revoke Executive Order 1402041 and every policy, including subregulatory guidance documents, produced on behalf of or related to the establishment or promotion of the Gender Policy Council and its subsidiary issues. Abolishing the Gender Policy Council would eliminate central promotion of abortion (‘health services’); comprehensive sexuality education (‘education’); and the new woke gender ideology, which has as a principal tenet ‘gender affirming care’ and ‘sex-change’ surgeries on minors.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the next president to reinstate many EOs signed by Trump.** “The next President should also reinstate the many executive orders signed by President Trump that were designed to make the regulatory process more just, efficient, and transparent. Executive Orders 13771,9 13777,10 13891,11 13892,12 13893,13 13924 Section 6,14 13979,15 and 1398016 should be revived (with modifications as needed). Executive Order 1313217 on federalism should be strengthened so that state regulatory and fiscal operations are not commandeered by the federal government through so-called cooperative federalism programs. Additionally, the President should revise and sign an updated version of President Ronald Reagan’s Executive Order 1263018 on federal takings.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the next president strengthen the implementation of the Information Quality Act, use the authority of the Paperwork Reduction Act, and carefully enforce the Privacy Act.** “The next President should strengthen implementation of the Information Quality Act,<sup>19</sup> robustly use the authority of the Paperwork Reduction Act,<sup>20</sup> carefully enforce the Privacy Act,<sup>21</sup> and ensure the sound execution of OIRA’s statistical and other information policy functions. Regulatory cooperation agreements can also promote the further adoption of good regulatory practices, which improve market conditions for America and her allies. OIRA should also work with other components of OMB to revise and apply OMB’s uniform Guidance for Grants and Agreements<sup>22</sup> and ensure that federal contract and grant guidelines satisfy EO 12866 and other centralized standards as appropriate.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the president to reintroduce the concept of administrative pay-as-you-go.** “Regardless of whether Congress adopts the President’s full set of budget recommendations, the President should reintroduce the concept of administrative pay-as-you-go, or administrative PAYGO. This simple procedural requirement imposes budget neutrality on the discretionary choices of federal agencies, of which there are many in nearly all areas of policymaking. This simple step forces the executive branch to control what it can control. The principle may occasionally yield to other overarching requirements, such as a presidential regulatory budget, but in nearly all cases, administrative PAYGO plays a unique and indispensable role in enforcing fiscal responsibility at federal departments and agencies.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025: The next president should work with Congress to pass legislation to rein in “the administrative state.”** “The next President should work with Congress to pass significant regulatory policy and process reforms, which could go a long way toward reining in the administrative state. Excellent examples of such legislation include the Regulatory Accountability Act,<sup>23</sup> SMART Act,<sup>24</sup> GOOD Act,<sup>25</sup> Early Participation in Regulations Act,<sup>26</sup> Unfunded Mandates Accountability and Transparency Act,<sup>27</sup> and REINS Act.<sup>28</sup>” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the next president to work with Congress “to maximize the utility of the Congressional Review Act.”** “Finally, the next President should work with Congress to maximize the utility of the Congressional Review Act (CRA),<sup>29</sup> which allows Congress to undo midnight regulatory actions (including those disguised as ‘guidance’) on an accelerated timeline. To leverage the CRA’s power to the maximum extent, Congress and the President should enact the Midnight Rules Relief Act,<sup>30</sup> which would help to ensure that multiple regulatory actions could be packaged and voted on at the same time. Immediate and robust use of the CRA would allow the President to focus his rulemaking resources on major new regulatory reforms rather than devoting months or years to undoing the final rulemakings of the Biden Administration.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025: The next president should issue an EO “to reshape the USGCRP and related climate change research programs.”** “The President should also issue an executive order to reshape the U.S. Global Change Research Program (USGCRP) and related climate change research programs. The USGCRP produces strategic plans and research (for example, the National Climate Assessment) that reduce the scope of legally proper options in presidential decision-making and in agency rulemakings and adjudications. Also, since much environmental policymaking must run the gauntlet of judicial review, USGCRP actions can frustrate successful litigation defense in ways that the career bureaucracy should not be permitted to control. The process for producing assessments should include diverse viewpoints.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the president to instruct CEQ to rewrite regulations implementing the National Environmental Policy Act along the lines of the 2020 reforms.** “The President should instruct the CEQ to rewrite its regulations implementing NEPA along the lines of the historic 2020 effort and restoring its key provisions such as banning the use of cumulative impact analysis. This effort should incorporate new learning and more aggressive reform options that were not included in the 2020 reform package with the overall goal of streamlining the process to build on the Supreme Court ruling that ‘CEQ’s interpretation of NEPA is entitled to substantial deference.’<sup>37</sup> It should frame the new regulations to limit the scope for judicial review of agency NEPA analysis and judicial remedies, as well as to vindicate the strong public interest in effective and timely agency action.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the next president to eliminate the Interagency Working Group on the Social Cost of Carbon and to sign an EO ending the use of its analysis.** “The President should eliminate the Interagency Working Group on the Social Cost of Carbon (SCC), which is cochaired by the OSTP, OMB, and CEA, and by executive order should end the use of SCC analysis.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025: The next president should, if required, “refuse to accept any USGCRP assessment prepared under the Biden administration.”** “The President should also issue an executive order to reshape the U.S. Global Change Research Program (USGCRP) and related climate change research programs. The USGCRP produces strategic plans and research (for example, the National Climate Assessment) that reduce the scope of legally proper options in presidential decision-making and in agency rulemakings and adjudications. Also, since much environmental policymaking must run the gauntlet of judicial review, USGCRP actions can frustrate successful litigation defense in ways that the career bureaucracy should not be permitted to control. The process for producing assessments should include diverse viewpoints. The OSTP and OMB should jointly assess the independence of the contractors used to conduct much of this outsourced government research that serves as the basis for policymaking. The next President should critically analyze and, if required, refuse to accept any USGCRP assessment prepared under the Biden Administration.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the president to empower a strong NSC that “is entrusted with the full power of the presidency to drive the bureaucracy.”** “The President should empower a strong NSC that not only has the power to convene the policy process, but also is entrusted with the full power of the



presidency to drive the bureaucracy.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025: “the NSA should immediately evaluate and eliminate directorates that are not aligned with the President’s agenda and replace them with new directorates as appropriate that can drive implementation of the President’s signature national security priorities.”** “In organizing (by means of Presidential Directive<sup>31</sup>) an NSC staff that is more responsive and aligned with the President’s goals and empowered to implement them, the NSA should immediately evaluate and eliminate directorates that are not aligned with the President’s agenda and replace them with new directorates as appropriate that can drive implementation of the President’s signature national security priorities. In addition to realigning the staff organization to the President’s priorities, the NSA should assign responsibility for implementation of specific policy initiatives to senior NSC officials from across the NSC staff structure. These officials should develop, direct, and execute tangible action plans in coordination with multiple agencies to achieve measurable, time-defined milestones.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025 calls for the removal of NSA personnel from the NSC on day one and replace them with “aligned political appointees and trusted career officials.”** “The NSC staff will need to consolidate the functions of both the NSC and the Homeland Security Council (HSC), incorporate the recently established Office of the National Cyber Director, and evaluate the required regional and functional directorates. Given the aforementioned prerequisites, the NSC should be properly resourced with sufficient policy professionals, and the NSA should prioritize staffing the vast majority of NSC directorates with aligned political appointees and trusted career officials. For instance, the NSA should return all non essential detailees to their home agencies on their first day in office so that the new Administration can proceed efficiently without the personnel land mines left by the previous stewards and as soon as possible should replace all essential detailees with staff aligned to the new President’s priorities.” [Executive Office of the President of the United States, Project 2025, page 52]

**Project 2025: The next administration should limit the number of staff at the NSC “to ensure more direct presidential control.”** “Special attention should be given to the use of detailees to staff the NSC. In recent years, the NSC’s staff size has been rightsized from its peak of 400 in 2015 down to 100–150 professional members. The next Administration should try to limit the number of detailees to ensure more direct presidential control.” [White House Office, Project 2025, accessed [6/24/24](#)]

**Project 2025 suggested empowering the USTR to serve in a leadership role.** “The Office of the U.S. Trade Representative provides the President with the internal White House resources necessary to formulate and execute a unified, whole-of-government approach to trade policy. The President should ensure that the USTR is empowered to serve in that leadership role, much as other EOP components organize and drive a coordinated policy agenda on behalf of the President.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

**Project 2025: “If science is being manipulated at the agencies to support separate political and institutional agendas, the President should increase the prominence of the OSTP’s Director either formally or informally.”** “The OSTP’s functions, as contained in the law, are to advise the President of scientific and technological considerations, evaluate the effectiveness of the federal effort, and generally lead and coordinate the federal government’s R&D programs. If science is being manipulated at the agencies to support separate political and institutional agendas, the President should increase the prominence of the OSTP’s Director either formally or informally. This would elevate the role of science in policy discussions and subsequent outcomes and theoretically help to balance out agencies like the Departments of Energy, State, and Commerce and the Environmental Protection Agency and Council on Environmental Quality. The OSTP can also help to bring technical expertise to regulatory matters in support of OMB.” [Executive Office of the President of the United States, Project 2025, accessed [6/24/24](#)]

<b>Other Guardrails that would be Demolished</b>
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The ability to carry out the Project 2025 agenda and the harm it would cause the American people would be hastened by other promises by Trump and his acolytes to destroy many other traditional guardrails that have preserved the separation of powers and ensured transparency in government. Some of these promises have been made outside the confines of the Project 2025 agenda but will be critical to carrying out its program.

### **Seizing the congressional power of the purse to cancel federal funding of individual programs and to specific communities.**

- “Unaccountable federal spending is the secret lifeblood of the Great Awakening. Nearly every power center held by the Left is funded or supported, one way or another, through the bureaucracy by Congress. [...] A conservative President must look to the legislative branch for decisive action. The Administrative State is not going anywhere until Congress acts to retrieve its own power from bureaucrats and the White House. But in the meantime, there are many executive tools a courageous conservative President can use to handcuff the bureaucracy, push Congress to return to its constitutional responsibility, restore power over Washington to the American people, bring the Administrative State to heel, and in the process defang and defund the woke culture warriors who have infiltrated every last institution in America.” [Executive Office of the President of the United States, Project 2025, accessed 6/24/24]]
- “Donald Trump is vowing to wrest key spending powers from Congress if elected this November, promising to assert more control over the federal budget than any president in U.S. history. The Constitution gives control over spending to Congress, but Trump and his aides maintain that the president should have much more discretion — including the authority to cease programs altogether, even if lawmakers fund them. Depending on the response from the Supreme Court and Congress, Trump’s plans could upend the balance of power between the three branches of the federal government.” [Washington Post, accessed [7/24/24](#)]

### **Weakening the press: Reducing the media’s presence on the White House campus, making it harder for them to meaningfully report on the President’s power grabs.**

- Project 2025: “No legal entitlement exists for the provision of permanent space for media on the White House campus, and the next Administration should reexamine the balance between media demands and space constraints on the White House premises.” “Operational functions of the Office of Communications include scheduling and running press briefings, interviews, meetings, media appearances, speeches, and a range of other events. The Office of Communications must maintain robust relationships with the White House Press Corps, the White House Correspondents’ Association, regional stakeholders, and key interest groups. No legal entitlement exists for the provision of permanent space for media on the White House campus, and the next Administration should reexamine the balance between media demands and space constraints on the White House premises.” [White House Office, Project 2025].
- Mention the discussion above regarding FCC licensing/political enemies; these tactics go hand in hand. Also eliminates funding for CPB (NPR, PBS) and Voice of America.

### **Deploying the U.S. military as a domestic police force to quash dissent and the right to protest and enforce a draconian immigration agenda.**

- “Much of the planning for a second term has been unofficially outsourced to a partnership of right-wing think tanks in Washington. Dubbed ‘Project 2025,’ the group is developing a plan, to include draft executive orders, that would deploy the military domestically under the Insurrection Act, according to a person involved in those conversations and internal communications reviewed by The Washington Post. The law, last updated in 1871, authorizes the president to deploy the military for domestic law enforcement.” [Washington Post, accessed [7/24/24](#)]
- “One document drafted by CRA staff and fellows includes a list of top priorities for CRA [Center for Renewing America] in a second Trump term. Others [drafted by CRA] include invoking the Insurrection Act on Day One to quash protests and refusing to spend authorized congressional funds on unwanted projects, a practice banned by lawmakers in the Nixon era. DENIAL: “Rachel Cauley, CRA’s communication director, said “the so-called reporting from POLITICO in this story is false and we told them so on multiple occasions.” [Politico, accessed [7/24/24](#)]

- “As the president’s top adviser on immigration matters, Miller advocated for invoking the Insurrection Act to mobilize the Department of Defense, according to the former officials. Pentagon officials balked at the idea of using military bases and planes, current and former officials recalled, citing concerns of getting mired in an open-ended commitment or compromising troop readiness.” [Washington Post, accessed [7/24/24](#)]
- “Though the emergency powers that the Insurrection Act confers are inherently susceptible to abuse, presidents’ respect for democratic values and constitutional norms has by and large prevented that. A partnership of right-wing think tanks, dubbed [Project 2025](#), has drawn up executive orders to do so. Jeffrey Clark, a former Justice Department official who is one of the unnamed co-conspirators in Mr. Trump’s indictment in the federal election interference case, is leading this work.” Washington Post editorial, accessed [7/24/24](#)]
- “How Trump and his advisers intend to staff such a [deportation] program would make a prospective Trump deportation campaign even more volatile. Stephen Miller, Trump’s top immigration adviser, has publicly declared that they would pursue such an enormous effort partly by creating a private red-state army under the president’s command. Miller says a reelected Trump intends to requisition National Guard troops from sympathetic Republican-controlled states and then deploy them into Democratic-run states whose governors refuse to cooperate with their deportation drive.” [The Atlantic, accessed [7/24/24](#)]

**Neutering the Senate’s role in confirming presidential nominees - and bypassing transparency on key senior government officials - by intentionally installing appointees in *acting* administrative roles.**

- “To push past senators who try to block presidential Cabinet nominees, Project 2025 proposes installing top allies in acting administrative roles, as was done during the Trump administration to bypass the Senate confirmation process.” [Associated Press, accessed [7/25/24](#)]
- Circumvents Senate confirmation positions by placing its nominees in key positions into similar positions as “Actings.” “An Aggressive Approach to Senate-Confirmed Leadership Positions. While Senate confirmation is a constitutionally necessary requirement for appointing agency leadership, the next Administration may need to take a novel approach to the confirmations process to ensure an adequate and rapid transition. For example, the next Administration arguably should place its nominees for key positions into similar positions as ‘actings’ (for example, putting in a person to serve as the Senior Official Performing the Duties of the Commissioner of CBP while that person is going through the confirmation process to direct ICE or become the Secretary). This approach would both guarantee implementation of the Day One agenda and equip the department for potential emergency situations while still honoring the confirmation requirement.” Project 2025 (page 136).
- Abuses the Federal Vacancies Reform Act to bypass the Senate confirmation process. “To the extent provided by the Federal Vacancies Reform Act, appointees in consideration for Senate-confirmed positions (excluding the Administrator) should be prepared to serve as a Deputy or Principal Deputy to get into the agency on Day One while their nomination and affiliated confirmation processes proceeds.” Project 2025 (page 423).

## Justice System and Law Enforcement

### Top Lines

- ✓ Limits DOJ’s independence, such as by requiring the dismissal of any investigations, prosecutions, or cases that are deemed contrary to “Administration policies.”
- ✓ Urges reexamination of long-standing limits on contacts between White House officials and DOJ, which are currently contained to communications between the White House Counsel’s Office and the Attorney General’s Office, or the Deputy Attorney General, in order to prevent interference in criminal investigations and other matters, like the issuance of Office of Legal Counsel opinions.

- ✓ Calls for the “vast expansion of the number of [politica] appointees in every office and component across the department—especially in the Civil Rights Division, the FBI, and the EOIR” (the Executive Office of Immigration Review) to “promote the President’s agenda.”
- ✓ Curtails the independence of the FBI, including by eliminating the agency’s General Counsel’s Office and calling on Congress to end the 10-year term for FBI Director in order to make the FBI Director dependent on the President’s approval—thus abandoning a key Nixon-era reform.
- ✓ Uses new “separation of powers” assertions to direct DOJ to interpret a long-standing legal precedent, *Humphrey’s Executor*, as unconstitutional, allowing the President to fire the leaders of independent agencies and defy congressional efforts to insulate such entities from political interference—in addition to arguing for its reversal before the U.S. Supreme Court.
- ✓ Wilfully misinterprets and misuses the antiquated Comstock Act of 1873 to block access to both abortion pills and medical equipment used in abortion care—effectively banning abortion in all 50 states.
- ✓ Weaponizes the Civil Rights Division, as a top priority, “to investigate and prosecute all state and local governments, institutions of higher education, corporations, and any other private employers” that have diversity, equity, and inclusion policies in hiring, promotion, or admission.
- ✓ Directs the DOJ to bar the use of a “disparate impact standard” under Title VI of the Civil Rights Act, which prohibits discrimination based on race, color, or national origin in programs and activities that receive federal financial assistance, including grants, loans, and contracts.
- ✓ Removes the power of the Civil Rights Division to investigate and prosecute election-related crimes, such as “voter registration fraud,” and transfers that authority to the Criminal Division.
- ✓ Prohibits the FBI “from engaging, in general, in activities related to combating the spread of so-called misinformation and disinformation by Americans who are not tied to any plausible criminal activity,” including electoral disinformation campaigns.
- ✓ Directs the Attorney General to defend the Federal Election Commission if the FEC fails to authorize its general counsel to defend the agency, and urges that the Federal Elections Campaign Act be amended to remove the agency’s independent litigating authority.
- ✓ Expands the investigation of leaks, including using powerful tools to identify records of unauthorized disclosures of classified information to the media.
- ✓ Ends “all existing consent decrees” inconsistent with “Administration policy” which could reach an array of long-standing civil rights settlements and also specifically includes those involving the enforcement of the Freedom to Access Clinics Act—that protects the freedom to access a clinic for an abortion or other health care—along with the prioritization of the prosecution of vandalism against crisis pregnancy centers.
- ✓ Assists the U.S. Immigration and Customs Enforcement in obtaining information about immigrants, particularly those living in “sanctuary” cities and states.
- ✓ Pursues “legal action” against local District Attorneys and officials that the Administration claims are “refusing to prosecute criminal offenses in their jurisdictions.”
- ✓ Deploys DOJ to help secure the border by focusing on drug cartels and violent crime, including having DOJ work with “active-duty military personnel and National Guardsmen to assist in arrest operations along the border—something that has not yet been done.”
- ✓ Prosecutes “as much interstate drug activity as possible, including simple possession of distributable quantities” with no acknowledgement of state trend toward marijuana legalization.
- ✓ Expands the implementation of the death penalty in current and future cases.

**Project 2025 seeks to limit the independence of the Justice Department in numerous ways.** On January 20, 2025, and “in a manner consistent with applicable law,” a new administration “should prepare a plan to end immediately any policies, investigations, or cases that run contrary to law or Administration policies.” This could include, but is not limited to investigations into foreign election interference, such as Russia in 2016 and beyond: Project 2025 asserts that “A department that has twice engaged in covert domestic election interference and propaganda operations—the Russian collusion hoax in 2016 and the Hunter Biden laptop suppression in 2020—is a threat to the Republic.” This directive is expressly an afternoon of inauguration priority. [DOJ Project 2025, p. 557, accessed 6/24/2025]

**Project 2025 reexamines the long-standing policy to limit political interference in DOJ's investigations and prosecutions that is policed by an MOU that only the White House Counsel and the Attorney General or Deputy Attorney General communicate with each other, and not other White House officials.** “The Office of White House Counsel also serves as the primary gateway for communication between the White House and the Department of Justice (DOJ). Traditionally, both the White House Counsel and the Attorney General have issued a memo requiring all contact between the two institutions to occur only between the Office of White House Counsel and the Attorney General or Deputy Attorney General. The next Administration should reexamine this policy and determine whether it might be more efficient or more appropriate for communication to occur through additional channels. The White House Counsel also works closely with the DOJ Office of Legal Counsel to seek opinions on, for example, matters of policy development and the constitutionality of presidential power and privileges and with OLA and the DOJ Office of Legal Policy on presidential judicial nominees.” [DOJ Project 2025, accessed [6/24/24](#)] [White House Office section].

**Project 2025 plans to vastly increase the number of political appointees within DOJ and the FBI.** “Ensure the assignment of sufficient political appointees throughout the department.... Ensuring adequate accountability throughout the DOJ requires the intentional devotion of sufficient resources by the Administration—not simply replicating what was done under prior Administrations and reflected in the Plum Book. The number of appointees serving throughout the department in prior Administrations—particularly during the Trump Administration—has not been sufficient either to stop bad things from happening through proper management or to promote the President's agenda. It is not enough for political appointees to serve in obvious offices like the Office of the Attorney General or the Office of the Deputy Attorney General. The next conservative Administration must make every effort to obtain the resources to support a vast expansion of the number of appointees in every office and component across the department—especially in the Civil Rights Division, the FBI, and the EOIR.” [DOJ Project 2025, p. 569, accessed 6/24/2024]

**Project 2025 calls for limiting the independence of the FBI in several ways.** It calls for a new administration [to] eliminate any offices within the FBI that it has the power to eliminate without any action from Congress.” And it provides that the administration should “[s]ubmit a legislative proposal to Congress to eliminate the 10-year term for the Director.... The Director of the FBI must remain politically accountable to the President ... to rein in perceived or actual abuses....” [DOJ Project 2025, pp. 550-551, accessed 6/24/2024]

**Project 2025 calls for the FBI to report into the Assistant Attorney General for the Criminal Division of the DOJ.** “The next conservative Administration should direct the Attorney General to remove the FBI from the Deputy Attorney General's direct supervision within the department's organizational chart and instead place it under the general supervision of the Assistant Attorney General for the Criminal Division and the supervision of the Assistant Attorney General for the National Security Division, as applicable. This could be accomplished through a simple internal departmental reorganization and does not need to be approved by Congress.” [DOJ Project 2025, accessed [6/24/24](#)]

**Project 2025 seeks to overturn the Supreme Court ruling in *Humphrey's Executor*, which essentially approved “independent agencies whose directors are not removable by the President at will.”** “The next conservative Administration should embrace the Constitution and understand the obligation of the executive branch to use its independent resources and authorities to restrain the excesses of both the legislative and judicial branches. This will mean ensuring that the leadership of the Department of Justice and its components understand the separation of powers, that pushback among the branches is a positive feature and not a defect of our system, and that the federal system is strengthened, not weakened, by disagreement among the branches. One example includes potentially seeking the overruling of *Humphrey's Executor v. United States*. This case approved so-called independent agencies whose directors are not removable by the President at will. The Supreme Court has chipped away at *Humphrey's Executor* in cases like *Seila Law v. Consumer Financial Protection Bureau*, but the precedent remains. The next conservative Administration should formally take the

position that *Humphrey's Executor* violates the Constitution's separation of powers.” [DOJ Project 2025, p. 560, accessed 6/24/2024]

**Project 2025 plans to wilfully misinterpret and misuse the antiquated Comstock Act of 1873 to block access to both abortion pills and medical equipment used in abortion care—effectively banning abortion in all 50 states.** “Announcing a Campaign to Enforce the Criminal Prohibitions in 18 U.S. Code §§ 1461 and 1462 Against Providers and Distributors of Abortion Pills That Use the Mail. Federal law prohibits mailing ‘[e]very article, instrument, substance, drug, medicine, or thing which is advertised or described in a manner calculated to lead another to use or apply it for producing abortion.’ Following the Supreme Court’s decision in *Dobbs*, there is now no federal prohibition on the enforcement of this statute. The Department of Justice in the next conservative Administration should therefore announce its intent to enforce federal law against providers and distributors of such pills.” [Project 2025, p. 562, accessed [6/24/24](#)]

The Comstock Act reaches much further than abortion medicines: “Every obscene, lewd, lascivious, indecent, filthy or vile article, matter, thing, device, or substance; and—Every article or thing designed, adapted, or intended for producing abortion, or for any indecent or immoral use; and Every article, instrument, substance, drug, medicine, or thing which is advertised or described in a manner calculated to lead another to use or apply it for producing abortion, or for any indecent or immoral purpose; and Every written or printed card, letter, circular, book, pamphlet, advertisement, or notice of any kind giving information, directly or indirectly, where, or how, or from whom, or by what means any of such mentioned matters, articles, or things may be obtained or made, or where or by whom any act or operation of any kind for the procuring or producing of abortion will be done or performed, or how or by what means abortion may be produced, whether sealed or unsealed; and Every paper, writing, advertisement, or representation that any article, instrument, substance, drug, medicine, or thing may, or can, be used or applied for producing abortion, or for any indecent or immoral purpose...”. It also provides for harsh sentences: anyone who violates the Act shall be “imprisoned not more than five years, or both, for the first such offense, and shall be fined under this title or imprisoned not more than ten years, or both, for each such offense thereafter.”

**Project 2025 calls for using the Department of Justice to combat the “radical liberal agenda” by instead, “[placing a high priority on reforming the DOJ and its culture to align the department with its core purposes and advance the national interest.”** Specifically, it states that the “Civil Rights Division should spend its first year under the next Administration using the full force of federal prosecutorial resources to investigate and prosecute all state and local governments, institutions of higher education, corporations, and any other private employers who are engaged in discrimination in violation of constitutional and legal requirements.” Elsewhere describes DEI as discrimination by asserting that: “the Biden Administration—through the DOJ’s Civil Rights Division and other federal entities—has enshrined affirmative discrimination in all aspects of its operations under the guise of “equity.” Federal agencies and their components have established so-called diversity, equity, and inclusion (DEI) offices that have become the vehicles for this unlawful discrimination, and all departments and agencies have created “equity” plans to carry out these invidious schemes. [DOJ Project 2025, pp. 561-562, accessed [6/24/24](#)]

**Project 2025 calls for the elimination of disparate impact theories of establishing discrimination, including racial discrimination—even though, as Supreme Court Justice Earl Warren emphasized, the Constitution forbids “sophisticated, as well as simple-minded, modes of discrimination.”** Project 2025 commands that “[i]n addition to rescinding the policy and any related guidance, the next Secretary should work with the next Attorney General on a regulation that would clarify current regulations to state that Title VI of the Civil Rights Act does not include a disparate impact standard.” Title VI of the Civil Rights Act prohibits discrimination based on race, color, or national origin in programs and activities that receive federal financial assistance, including grants, loans, and contracts.[Project 2025, p. 331]

**Project 2025 proposes moving election-related investigations and prosecutions from the Civil Rights Division to the Criminal Division.** “Investigations and prosecutions under 18 U.S. Code § 241

are currently within the jurisdictional oversight of the Civil Rights Division, not the Criminal Division.<sup>86</sup> Only by moving authority for 18 U.S. Code § 241 investigations and prosecutions back to the Criminal Division will the rule of law be appropriately enforced.” It also asserts that “Otherwise, voter registration fraud and unlawful ballot correction will remain federal election offenses that are never appropriately investigated and prosecuted.” [DOJ Project 2025, accessed 6/24/24]

**Project 2025 intends to limit the FBI’s ability to combat domestic extremism by limiting misinformation and disinformation tracking.** The FBI would be completely reformed — including a mandate to prohibit the agency from “engaging, in general, in activities related to combating the spread of so-called misinformation and disinformation by Americans who are not tied to any plausible criminal activity.” [DOJ Project 2025, accessed [6/24/24](#)]

**Project 2025 proposes further politicization of the enforcement of federal campaign finance laws.** “The President should direct the DOJ and the attorney general not to prosecute individuals under an interpretation of the law with which the FEC—the expert agency designated by Congress to enforce the law civilly and issue regulations establishing the standards under which the law is applied—does not agree... [but] The President should direct the attorney general to defend the FEC in all litigation when there is a failure of the commissioners to authorize the general counsel of the agency to defend it.” However, in this section of Project 2025 written by Hans von Spakovsky, it also recommends that “Congress amend FECA to remove the agency’s independent litigating authority and rely on the Department of Justice to handle all litigation involving the FEC.” [Project 2025, pp. 863-865, accessed 6/24/2024]

**Project 2025 demands that DOJ investigate leaks, including leaks to the media.** “[T]he Department of Justice should use all of the tools at its disposal to investigate leaks and should rescind damaging guidance by Attorney General Merrick Garland that limits investigators’ ability to identify records of unauthorized disclosures of classified information to the media.” [Project 2025, pp. 214, accessed 6/24/2024]

**Project 2025 demands the ending of “all existing consent decrees” deemed to be inconsistent with “Administration policy” which could affect numerous civil rights decrees and which specifically include those enforcing the Freedom to Access Clinics Act along with prioritizing the prosecution of vandalism against crisis pregnancy centers.** Project 2025 expressly proposes “eliminating” “all existing consent decrees” if they are inconsistent with “Administration policy” regardless of subject. This could reach an array of long-standing consent decrees on “voting” rights and other civil rights plus possibly an array of other matters, such as police treatment of people or immigration detention conditions.

It expressly applies to consent decrees around the enforcement of FACE Act protections for clinics that have been targeting by those opposed to abortion: “Ensure that its review extends beyond ending the absurd double standards embodied in the ongoing campaign of FACE Act prosecutions and instead be a thorough and holistic review of all DOJ activities, including all consent decrees and settlement agreements currently in force.” It demands that DOJ “[s]eek to terminate any unnecessary or outdated consent decree to which the United States is a party” and “[c]onsider pursuing intervention in other matters where consent decrees or settlement agreements continue to bind parties years or decades after the fact.” It also contemplates prioritizing the prosecution of all vandalism against crisis pregnancy centers which use an array of means to convince people not to get abortions. [Project 2025, pp. 557, 558, 563, accessed 6/24/2024]

**Project 2025 plans for the DOJ to assist the U.S. Immigration and Customs Enforcement in obtaining information about immigrants, particularly those living in “sanctuary” cities and states.** “Pursue appropriate steps to assist the Department of Homeland Security in obtaining information about criminal aliens in jurisdictions across the United States, particularly those inside ‘sanctuary’ jurisdictions.” In addition to requiring DOJ cooperation in this area, Project 2025 would withholding federal funding to states and cities that have declared sanctuary status and do not cooperate with the administration’s immigration policies, which include declaring a “mass migration” crisis, conducting mass deportations,

ending the Flores Settlement (regarding the treatment of children detained), and disregarding long-standing rules regarding the 100-mile distance from the border for certain kinds of activities.

**Project 2025 also plans for “legal action” against local District Attorneys and officials that the Administration claims are “refusing to prosecute criminal offenses in their jurisdictions,” which would include prosecutions of those accused of violating federal immigration law or state criminal law.** “Where warranted and proper under federal law, initiate legal action against local officials—including District Attorneys—who deny American citizens the “equal protection of the laws” by refusing to prosecute criminal offenses in their jurisdictions.” [DOJ Project 2025, accessed [6/24/24](#)] [p. 553]

**Project 2025 would deploy the DOJ to help secure the border by focusing on drug cartels and violent crime, including having DOJ work with “active-duty military personnel and National Guardsmen to assist in arrest operations along the border—something that has not yet been done.”** “In addition to finalizing the southwestern land border wall, the next Administration should take a creative and aggressive approach to tackling these dangerous criminal organizations at the border. This could include use of active-duty military personnel and National Guardsmen to assist in arrest operations along the border—something that has not yet been done.” [DOJ Project 2025, p. 555, accessed [6/25/24](#)]

**Project 2025 prioritizes the DOJ prosecuting “as much interstate drug activity as possible, including simple possession of distributable quantities,” with no acknowledgement of the state trend toward marijuana legalization.** “Recent efforts to create the impression that drug possession crimes are not serious offenses has contributed to the explosion of criminal organization activities in the United States. [DOJ Project 2025, p. 555, accessed [6/25/24](#)]

**Project 2025 plans for the expanded implementation of the death penalty in current and future cases.** It contemplates the execution of all those on death row in federal custody in addition to expanding efforts to seek the death penalty in other cases. [DOJ Project 2025, p. 555, accessed [6/25/24](#)]

## Health and Human Services

### Top Lines

#### Abortion

- ✓ Propagates the belief that life begins “from the moment of conception.” This so-called “personhood” language could ban not only abortion, but also some forms of birth control and assisted fertility treatments like IVF.
- ✓ Claimed repeatedly that abortion is not health care and proposed removing the word abortion from every existing rule, regulation, contract, grant, and legislation.
- ✓ Would reverse the FDA approval of abortion pills.
- ✓ Want to reverse the FDA’s decision to lift medically unnecessary restrictions on medication abortion that made it more accessible.
- ✓ Would ban federal funding for those forced to travel to access abortion care.
- ✓ Prohibit Planned Parenthood from receiving Medicaid funds.
- ✓ Urged Congress to pass a bill to defund Planned Parenthood.
- ✓ Would not enforce federal law for hospitals to provide emergency abortion care as required by the Emergency Medical Treatment and Active Labor Act.
- ✓ Wrote the Office of Refugee Resettlement should not be allowed to facilitate abortions for unaccompanied minors in their custody.
- ✓ Pushed for the restoration of exemptions to the contraceptive coverage benefit in the ACA.
- ✓ Said there is no authority to add male condoms to the contraceptive coverage benefit.
- ✓ Seeks to exclude particular types of contraception from the ACA contraceptive coverage benefit by using mis- and disinformation about how contraception works.
- ✓ Proposed replacing Reproductive Healthcare Access Task Force with an anti-abortion task force.



- ✓ Research using human embryonic stem cells shouldn't be subsidized with taxpayer money.
- ✓ Would end human embryonic stem cell registry.
- ✓ Would ban "three-parent embryo creation and human cloning research."

#### **LGBTQIA+**

- ✓ Urged CDC to not collect gender identity data, which they call "destructive dogma."
- ✓ Gender-affirming surgery should not be covered under Medicare or Medicaid.
- ✓ Faith-based adoption agencies should be allowed to discriminate against same-sex couples.
- ✓ Urged passage of legislation so adoption and foster care providers couldn't be charged with discrimination if they refuse to work with same-sex couples.
- ✓ Claimed children raised in same-sex marriages were more likely to be unstable.

#### **Medicare**

- ✓ Would repeal the provision in the IRA that allows Medicare to negotiate prescription drug prices.
- ✓ Would repeal Inflation Reduction Act and the Medicare Shared Savings Program.
- ✓ Proposed making Medicare Advantage the default enrollment option.
- ✓ Recommended using AI to reduce waste, fraud, and abuse.

#### **Medicaid**

- ✓ Proposed CMS implement time limits or lifetime caps on benefits to "disincentivize permanent dependence."
- ✓ Urged CMS to "incentivize personal responsibility" and consumer choice for recipients.
- ✓ Should allow families to use Medicaid funding to obtain coverage outside of Medicaid.

#### **Head Start**

- ✓ Eliminate the federal Head Start program along with the entire Office of Head Start.

#### **Hurt Non-Traditional Families**

- ✓ Repeal Biden administration policies they claim subsidize single-motherhood, disincentivize work, and penalize marriage.
- ✓ Would prioritize funding home-based childcare by parents or family in lieu of universal childcare.

#### **CDC**

- ✓ Called CDC "most incompetent and arrogant agency in the federal government."
- ✓ CDC should never again be allowed to say school children must be vaccinated or masked.
- ✓ Would decommission the CDC Foundation.
- ✓ Rescind legal analysis that allowed a moratorium on evictions during the pandemic.

#### **NIH**

- ✓ Congress should consider block granting NIH's grant budget to states.
- ✓ Would decommission the NIH Foundation.

#### **ACA**

- ✓ Proposed removing restrictions on physician-owned hospitals that were imposed in ACA.
- ✓ Proposed separating insurance plans from subsidized ACA exchange from nonsubsidized market.

#### **Abstinence**

- ✓ Recommended people should delay sex to prevent pregnancy so they wouldn't end up relying on TANF.
- ✓ Argued teaching sex education to students would "promote prostitution, provide a funnel effect for abortion facilities and school field trips to clinics."

## Abortion

**Project 2025 propagates so-called personhood ideology that life begins “from the moment of conception.”** “The Secretary should pursue a robust agenda to protect the fundamental right to life, protect conscience rights, and uphold bodily integrity rooted in biological realities, not ideology. From the moment of conception, every human being possesses inherent dignity and worth, and our humanity does not depend on our age, stage of development, race, or abilities.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 claims that “Abortion and euthanasia are not health care.”** “The Secretary must ensure that all HHS programs and activities are rooted in a deep respect for innocent human life from day one until natural death: Abortion and euthanasia are not health care.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 outrageously wrote that the CDC should not promote “abortion as health care” and “does not promote misinformation regarding the comparative health and psychological benefits of childbirth versus the health and psychological risks of intentionally taking a human life through abortion.”** “The CDC should eliminate programs and projects that do not respect human life and conscience rights and that undermine family formation. It should ensure that it is not promoting abortion as health care. It should fund studies into the risks and complications of abortion and ensure that it corrects and does not promote misinformation regarding the comparative health and psychological benefits of childbirth versus the health and psychological risks of intentionally taking a human life through abortion.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 claimed the CDC funded the development of COVID-19 vaccines “with aborted fetal cell lines.”** “The CDC oversaw and funded the development and testing of the COVID-19 vaccines with aborted fetal cell lines, insensitive to the consciences of tens of thousands to hundreds of thousands of people who objected to taking a vaccine with such a link to abortion. As evidenced by litigation across the country, it is likely that thousands were fired unjustly because of the exercise of their consciences or faith on this question, which could have been avoided with a modicum of concern for this issue from CDC.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposed prohibiting stem cell research, writing that, “There is never any justification for ending a child’s life as part of research.”** “There is never any justification for ending a child’s life as part of research, and the research benefits from splicing or growing aborted fetal cells and aborted baby body parts can easily be provided by alternative sources. All such research should be prohibited as a matter of law and policy.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the CDC to better track abortions nationwide “to ensure that every state reports exactly how many abortions take place within its borders” and threaten states that do not submit data with cutting access to federal funds.** “The CDC’s abortion surveillance and maternity mortality reporting systems are woefully inadequate. CDC abortion data are reported by states on a voluntary basis, and California, Maryland, and New Hampshire do not submit abortion data at all. Accurate and reliable statistical data about abortion, abortion survivors, and abortion-related maternal deaths are essential to timely, reliable public health and policy analysis. Because liberal states have now become sanctuaries for abortion tourism, HHS should use every available tool, including the cutting of funds, to ensure that every state reports exactly how many abortions take place within its borders, at what gestational age of the child, for what reason, the mother’s state of residence, and by what method. It should also ensure that statistics are separated by category: spontaneous miscarriage; treatments that incidentally result in the death of a child (such as chemotherapy); stillbirths; and induced abortion. In addition, CDC should require monitoring and reporting for complications due to abortion and every instance of children being born alive after an abortion.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 supported legislation that would “improve the CDC’s abortion reporting mechanisms by requiring states, as a condition of federal Medicaid payments for family planning services, to report streamlined variables in a timely manner.”** “The Ensuring Accurate and Complete Abortion Data Reporting Act of 20239 would amend title XIX of the Social Security Act and Public Health Service Act to improve the CDC’s abortion reporting mechanisms by requiring states, as a condition of federal Medicaid payments for family planning services, to report streamlined variables in a timely manner.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

- **Project 2025: “Miscarriage management or standard ectopic pregnancy treatments should never be conflated with abortion.”** “Moreover, abortion should be clearly defined as only those procedures that intentionally end an unborn child’s life. Miscarriage management or standard ectopic pregnancy treatments should never be conflated with abortion.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Comparisons between live births and abortion should be tracked across various demographic indicators.”** “Comparisons between live births and abortion should be tracked across various demographic indicators to assess whether certain populations are targeted by abortion providers and whether better prenatal physical, mental, and social care improves infant outcomes and decreases abortion rates, especially among those who are most vulnerable.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the FDA to “reverse its approval of chemical abortion drugs.”** “FDA should therefore: I Reverse its approval of chemical abortion drugs because the politicized approval process was illegal from the start. The FDA failed to abide by its legal obligations to protect the health, safety, and welfare of girls and women. It never studied the safety of the drugs under the labeled conditions of use, ignored the potential impacts of the hormone-blocking regimen on the developing bodies of adolescent girls, disregarded the substantial evidence that chemical abortion drugs cause more complications than surgical abortions, and eliminated necessary safeguards for pregnant girls and women who undergo this dangerous drug regimen.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 argues that because Roe was overturned, the FDA should withdraw its approval of abortion pills falsely claiming that they are “dangerous to women and by definition fatally unsafe for unborn children.”** “Now that the Supreme Court has acknowledged that the Constitution contains no right to an abortion, the FDA is ethically and legally obliged to revisit and withdraw its initial approval, which was premised on pregnancy being an ‘illness’ and abortion being ‘therapeutically’ effective at treating this ‘illness.’ The FDA is statutorily charged with guaranteeing the safety and efficacy of drugs and therefore should withdraw this drug that is proven to be dangerous to women and by definition fatally unsafe for unborn children.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 ignores FDA’s decision to lift medically unnecessary restrictions on medication abortion that made it more accessible.** “Mail-Order Abortions. Allowing mail-order abortions is a gift to the abortion industry that allows it to expand far beyond brick-and-mortar clinics and into pro-life states that are trying to protect women, girls, and unborn children from abortion. The FDA should therefore: I Reinstate earlier safety protocols for Mifeprex that were mostly eliminated in 2016 and apply these protocols to any generic version of mifepristone. A bare-minimum policy of limiting abortion pills to the pre-2016 policy of 49 days gestation, returning to the pre-2021 in-person dispensing requirement, and returning to requiring prescribers to report all serious adverse events, not just deaths, to the drug sponsor would increase women’s health and safety.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the FDA to “Stop promoting or approving mail-order abortions in violation of long-standing federal laws that prohibit the mailing and interstate carriage of abortion [medications].”** This statement’s citation is to “18 U.S.C. 1461, <https://www.law.cornell.edu/uscode/text/18/1461> (accessed March 16, 2023), and 18 U.S.C. 1462,

<https://www.law.cornell.edu/uscode/text/18/1462> (accessed March 16, 2023).” These statutes make up the Comstock Act, an anti-obscenity law passed in 1873 which has never been used to prosecute anyone over abortion, but the Mandate aims “misapply the law to criminalize the mailing of items related to abortion in the mail.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#); Center for American Progress, [6/17/24](#)]

**Project 2025: “Research using fetal tissue obtained from elective abortions is immoral and obsolete. Research using human embryonic stem cells also involves the destruction of human life and should not be subsidized with taxpayer dollars.”** “Research using fetal tissue obtained from elective abortions is immoral and obsolete. Research using human embryonic stem cells also involves the destruction of human life and should not be subsidized with taxpayer dollars. Good science and life-affirming, ethical research are not mutually exclusive. In fact, ethically derived sources such as discarded surgical tissue and adult stem cells (made pluripotent), not tissue obtained from elective abortions, have contributed the most successful treatments for a variety of ailments.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on Congress to prohibit research using “abortion-derived fetal tissue.”** “Subsequently, however, the Biden Administration restored unrestricted funding of abortion-derived fetal tissue research. HHS should: I Promptly restore the ethics advisory committee to oversee abortion-derived fetal tissue research, and Congress should prohibit such research altogether.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on NIH to “end its human embryonic stem cell registry” and end intramural research projects “using tissue from aborted children.”** “End intramural research projects using tissue from aborted children within the NIH, which should end its human embryonic stem cell registry.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the banning of a “three-parent embryo creation and human cloning research.”** “Because the male–female dyad is essential to human nature and because every child has a right to a mother and father, three-parent embryo creation and human cloning research should be banned. A new NCB should convene leading experts to examine these issues and provide policy recommendations for the new frontier of bioethical questions that our country will have to address in the coming years.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025: “HHS should create and promote a research agenda that supports pro life policies and explores the harms, both mental and physical, that abortion has wrought on women and girls.”** [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 pushed for HHS to prohibit federal funding for those traveling to access abortion care.** “Prohibit abortion travel funding. Providing funding for abortions increases the number of abortions and violates the conscience and religious freedom rights of Americans who object to subsidizing the taking of life. The Hyde Amendment<sup>44</sup> has long prohibited the use of HHS funds for elective abortions, but an August 2022 Biden executive order<sup>45</sup> pressed the HHS Secretary to use his authority under Section 1115 demonstrations to waive certain provisions of the law in order to use taxpayer funds to achieve the Administration’s goal of helping women to travel out of state to obtain abortions. Moreover, the Department of Justice Office of Legal Counsel (DOJ OLC) issued a politicized legal opinion declaring, for the first time in the history of Hyde, that this action did not violate the Hyde Amendment and that Hyde applies only to the performance of the abortion itself in violation of the plainly broad language that Congress used. Two of the first actions of a pro-life Administration should be for HHS to withdraw the Medicaid guidance (and any Section 1115 waivers issued thereunder) and for DOJ OLC to withdraw and disavow its interpretation of the Hyde Amendment.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposed a prohibition on Planned Parenthood receiving Medicaid funds.** “Prohibit Planned Parenthood from receiving Medicaid funds. During the 2020–2021 reporting period, Planned Parenthood performed more than 383,000 abortions.<sup>46</sup> The national organization reported more than

\$133 million in excess revenue<sup>47</sup> and more than \$2.1 billion in net assets.<sup>48</sup> During this same year, Planned Parenthood reports that its affiliates received more than \$633 million in government funding and more than \$579 million in private contributions.<sup>49</sup> Planned Parenthood affiliates face accusations of waste, abuse and potential fraud with taxpayer dollars, failure to report the sexual abuse of minor girls, and allegations of profiting from the sale of organs from aborted babies.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended ending federal funding to Planned Parenthood through Medicaid by: Telling states they could defund Planned Parenthood in their state Medicaid plans, and propose a rule that Medicaid funding should be disqualified to providers of elected abortion via Medicaid.**

“Policymakers should end taxpayer funding of Planned Parenthood and all other abortion providers and redirect funding to health centers that provide real health care for women. The bulk of federal funding for Planned Parenthood comes through the Medicaid program. HHS should take two actions to limit this funding: 1. Issue guidance reemphasizing that states are free to defund Planned Parenthood in their state Medicaid plans. 2. Propose rulemaking to interpret the Medicaid statute to disqualify providers of elective abortion from the Medicaid program.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged Congress to pass a bill that would defund “abortion providers such as Planned Parenthood.”** “Congress should pass the Protecting Life and Taxpayers Act,<sup>50</sup> which would accomplish the goal of defunding abortion providers such as Planned Parenthood.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on CMS to resolve Section 1115 waivers in Idaho, South Carolina, and Tennessee, all states that want to prohibit abortion providers from participating in Medicaid.** “CMS should resolve pending Section 1115 waivers from Idaho, South Carolina, and Tennessee, which, like Texas in January 2022, are seeking both to prohibit abortion providers from participating in state-run Medicaid programs and to work with other states to do the same. Abortion is not health care, and states should be free to devise and implement programs that prioritize qualified providers that are not entangled with the abortion industry.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the withdrawal of up to 10% of Medicaid funds for states that require insurance for abortion in private insurance plans.** “Withdraw Medicaid funds for states that require abortion insurance or that discriminate in violation of the Weldon Amendment. The Weldon Amendment<sup>51</sup> declares that no HHS funding may go to a state or local government that discriminates against pro-life health entities or insurers. In blatant violation of this law, seven states require abortion coverage in private health insurance plans, and HHS continues to fund those states. HHS under President Trump disallowed \$200 million in Medicaid funding from California because of the state’s flouting of the law, but the Biden Administration restored it. HHS/CMS should withdraw appropriated funding, up to and including 10 percent of Medicaid funds, from states that require abortion insurance coverage. DOJ should commit to litigating the defense of those funding decisions promptly to the Supreme Court in order to maximize HHS’s ability to withdraw funds from entities that violate the Weldon Amendment.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 described the Biden administration’s guidance on the Emergency Medical Treatment and Active Labor Act that protects physicians and hospitals that perform abortions they deem necessary to stabilize a women’s health as “baseless” and said the guidance should be rescinded.** “In July 2022, HHS/CMS released guidance mandating that EMTALA-covered hospitals and the physicians who work there must perform abortions, to include completing chemical abortions even when the child might still be alive. The guidance also declared that EMTALA would protect physicians and hospitals that perform abortions in violation of state law if they deem those abortions necessary to stabilize the women’s health. This novel interpretation of EMTALA is baseless. EMTALA requires no abortions, preempts no pro-life state laws, and explicitly requires stabilization of the unborn child. HHS should rescind the guidance and end CMS and state agency investigations into cases of alleged refusals to perform abortions. DOJ should agree to eliminate existing injunctions against pro-life states, withdraw

its enforcement lawsuits, and in lawsuits against CMS on the guidance agree to injunctions against CMS and withdraw appeals of injunctions.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the passage of the No Taxpayer Funding For Abortion and Abortion Insurance Full Disclosure Act.** “Permanently codify both the Hyde family of amendments and the protections provided by the Weldon Amendment. Congress can accomplish this through legislation such as the No Taxpayer Funding for Abortion and Abortion Insurance Full Disclosure Act<sup>56</sup> (Hyde) and the Conscience Protection Act<sup>57</sup> (Weldon).” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the Office of Refugee Resettlement not to allow minors to access abortion care and “issue a new policy of instructing care providers not to allow girls to be transported for elective abortions.”** “Regardless of where ORR’s functions reside, ORR staff and care providers should never be allowed to facilitate abortions for unaccompanied children in its custody, including by transporting minors across state lines from pro-life states to abortion-friendly states. Pregnant, unaccompanied girls in ORR custody should be treated with dignity, not trafficked across state lines to be victimized by the abortion industry. ORR should withdraw its policy of allowing elective abortions for children in ORR care and issue a new policy of instructing care providers not to allow girls to be transported for elective abortions. HHS OGC and the White House should insist that DOJ fight to defend that policy up to the U.S. Supreme Court in light of Dobbs.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the next administration to allow employers to refuse to comply with the contraceptive coverage benefit in the ACA based on “religious and moral exemptions”.** “Restore Trump religious and moral exemptions to the contraceptive mandate (also a CMS rule). HHS should rescind, if finalized, the regulation titled ‘Coverage of Certain Preventive Services Under the Affordable Care Act,’ proposed jointly by HHS, Treasury, and Labor.<sup>70</sup> This rule proposes to amend Trump-era final rules regarding religious and moral exemptions and accommodations for coverage of certain preventive services under the ACA. Preventive services include contraception, and it appears the proposed rule would change the existing regulations for religious and moral exemptions to the ACA’s contraception mandate. There is no need for further rulemaking that curtails existing exemptions and accommodations.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged HHS to rescind its contract with the American College of Obstetricians and Gynecologists and related entities, which serve as the exclusive adviser on the content of the ACA’s contraceptive mandate.** “Moreover, since the Obama Administration HRSA entered into long-term contracts with the pro-abortion American College of Obstetricians and Gynecologists (ACOG) and related entities to serve as an exclusive adviser with respect to the content of this mandate, HRSA has used this arrangement to ignore comments that members of the public were sometimes able to submit in the process, and ACOG has abused its position to attack HHS’s allowance of religious and moral exemptions to the contraceptive mandate. HHS should rescind these contracts and establish an advisory committee that is compliant with the Federal Advisory Committee Act and has members that are committed to women’s preventive services and are not pro-abortion ideologues.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 claimed the Health Resources and Services Administration should not have the authority to add male condoms to the contraceptive coverage benefit , since “Congress explicitly limited the mandate to ‘women’s’ preventive care and screenings.”** “Eliminate men’s preventive services from the women’s preventive services mandate. In December 2021, HRSA updated its women’s preventive services guidelines to include male condoms after claiming for years that it had no authority to do so because Congress explicitly limited the mandate to ‘women’s’ preventive care and screenings. HRSA should not incorporate exclusively male contraceptive methods into guidelines that specify they encompass only women’s services.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the elimination of the emergency contraceptive Ella from the contraceptive coverage benefit.** “Eliminate the week-after-pill from the contraceptive mandate as a potential abortifacient. One of the emergency contraceptives covered under the HRSA preventive services guidelines is Ella (ulipristal acetate). Like its close cousin, the abortion pill mifepristone, Ella is a progesterone blocker and can prevent a recently fertilized embryo from implanting in a woman’s uterus. HRSA should eliminate this potential abortifacient from the contraceptive mandate.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

- **Planned Parenthood calls ella emergency contraception a morning-after pill that prevents pregnancy up to five days after unprotected sex.** “ella emergency contraception prevents pregnancy up to 5 days after unprotected sex. It’s more effective than other morning-after pills (like Plan B), but you need a prescription to get it. Like all morning-after pills, take ella ASAP.” [Planned Parenthood, accessed [6/24/24](#)]

**Project 2025 recommended eliminating the HHS Reproductive Healthcare Access Task Force and installing an anti-abortion task force in its stead.** “The Office of the Secretary should eliminate the HHS Reproductive Healthcare Access Task Force and install a pro-life task force to ensure that all of the department’s divisions seek to use their authority to promote the life and health of women and their unborn children.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025: “HHS should return to being known as the Department of Life by explicitly rejecting the notion that abortion is health care.”** “Additionally, HHS should return to being known as the Department of Life by explicitly rejecting the notion that abortion is health care and by restoring its mission statement under the Strategic Plan and elsewhere to include furthering the health and well-being of all Americans ‘from conception to natural death.’” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the Office of Science and Medicine to investigate scientifically baseless claims regarding “the effect of abortion on prematurity and breast cancer; lack of evidence for so-called gender-affirming care; and physical and emotional damage following cross-sex treatments, especially on children.”** “In dealing with sexually transmitted diseases and unwanted pregnancies, the OASH should focus on root-cause analysis with a focus on strengthening marriage and sexual risk avoidance. Strong leadership is needed in the Office of Science and Medicine to drive investigative review of literature for a variety of issues including the effect of abortion on prematurity and breast cancer; lack of evidence for so-called gender-affirming care; and physical and emotional damage following cross-sex treatments, especially on children.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged passage of the Title X Abortion Provider Prohibition Act.** “Congress should complement these efforts by passing legislation such as the Title X Abortion Provider Prohibition Act,<sup>78</sup> which would prohibit family planning grants from going to entities that perform abortions or provide funding to other entities that perform abortions. This would help to protect the integrity of the Title X program even under an abortion-friendly Administration.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the HHS Office of General Counsel to encourage DOJ to repeal memos they falsely claim allow abortion funding despite Hyde and allow federal enclave immunity to perform abortions.** “Encourage DOJ to repeal OLC memos allowing abortion funding despite Hyde and memos allowing federal enclave immunity to perform abortions despite the Assimilative Crimes Act.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025: HHS’s Office of Global Affairs should oversee implementation of the global gag rule.** “OGA should hold oversight authority for implementation of the Mexico City policy throughout all divisions.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

**Project 2025 pushed the HHS Office of Civil Rights to withdraw their medication abortion guidance for pharmacies.** “OCR should withdraw its pharmacy abortion mandate guidance. OCR should withdraw its ‘Obligations Under Federal Civil Rights Laws to Ensure Access to Comprehensive Reproductive Health Care Services’ guidance for retail pharmacies, which purports to address nondiscrimination obligations of pharmacies under federal civil rights laws and in fact orders them to stock and dispense first-trimester abortion drugs. The guidance invents this so-called requirement and fails to acknowledge that pharmacies and pharmacists have the right not to participate in abortions, including pill-induced abortions, if doing so would violate their sincere moral or religious objections. Moreover, no federal civil rights laws preempt state pro-life statutes.” [Department of Health and Human Services, Chapter 14, Project 2025, accessed [6/24/24](#)]

## LGBTQIA+

**Project 2025 called the idea of gender identity a “destructive dogma.”** “Radical actors inside and outside government are promoting harmful identity politics that replaces biological sex with subjective notions of ‘gender identity’ and bases a person’s worth on his or her race, sex, or other identities. This destructive dogma, under the guise of ‘equity,’ threatens American’s fundamental liberties as well as the health and well-being of children and adults alike. The next Secretary must ensure that HHS programs protect children’s minds and bodies and that HHS programs respect parents’ basic right to direct the upbringing, education, and care of their children.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the CDC to stop collecting data on gender identity, which they claim “legitimizes the unscientific notion that men can become women (and vice versa).”** “The CDC should immediately end its collection of data on gender identity, which legitimizes the unscientific notion that men can become women (and vice versa) and encourages the phenomenon of ever-multiplying subjective identities.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 argued NIH “should fund studies into the short-term and long-term negative effects of cross-sex interventions.”** “NIH has been at the forefront in pushing junk gender science. Instead, it should fund studies into the short-term and long-term negative effects of cross-sex interventions, including ‘affirmation,’ puberty blockers, cross-sex hormones and surgeries, and the likelihood of desistence if young people are given counseling that does not include medical or social interventions.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025: HHS should “that allow medical practitioners to participate in federal health care programs without being compelled to provide sex changes or similar services.”** “Finally, HHS needs to restore and enhance conscience protection regulations that allow medical practitioners to participate in federal health care programs without being compelled to provide sex changes or similar services.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for gender reassignment surgery to not be covered under Medicare or Medicaid.** “Reissue a stronger transgender national coverage determination. CMS should repromulgate its 2016 decision that CMS could not issue a National Coverage Determination (NCD) regarding ‘gender reassignment surgery’ for Medicare beneficiaries. In doing so, CMS should acknowledge the growing body of evidence that such interventions are dangerous and acknowledge that there is insufficient scientific evidence to support such coverage in state plans.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The redefinition of sex to cover gender identity and sexual orientation and pregnancy to cover abortion should be reversed in all HHS and CMS programs.”** “Under the proposed rule, sex is redefined: ‘Discrimination on the basis of sex includes, but is not limited to, discrimination on the basis of sex stereotypes; sex characteristics, including intersex traits; pregnancy or related conditions; sexual orientation; and gender identity.’<sup>59</sup> In other words, the department proposes to interpret Section 1557 as if it created special privileges for new classes of people, defined in ways that



are highly ideological and unscientific. The redefinition of sex to cover gender identity and sexual orientation and pregnancy to cover abortion should be reversed in all HHS and CMS programs as was done under the Trump Administration. This includes the Children’s Health Insurance Program (CHIP). Low-income families who rely on CHIP should not be coerced, pressured, or otherwise encouraged to embrace this ideologically motivated sexualization of their children.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 argued that faith-based adoption agencies should be allowed to discriminate against same-sex couples “due to their religious belief that a child should have a married mother and father.”** “Unfortunately, many of the faith-based adoption agencies that serve these children are under threat from lawsuits, or else their licenses and contracts have been halted because they cannot in good conscience place children in every household due to their religious belief that a child should have a married mother and father. HHS, through ACF and the Assistant Secretary for Financial Resources (ASFR), should repeal the unnecessary 2016 regulation<sup>61</sup> that imposes nonstatutory sexual orientation and gender identity nondiscrimination conditions on agency grants and return to the policy of maximizing the options for placing vulnerable children in their forever homes. ACF and OCR should also survey their programs to consider whether additional waivers of HHS grant conditions—waivers the Biden Administration revoked in 2021—are needed for faith-based agencies.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged passage of the Child Welfare Provider Inclusion Act so providers and organizations could not be subjected to charges of discrimination for providing adoption and foster care based on religious beliefs about marriage.** “Additionally, Congress should pass the Child Welfare Provider Inclusion Act<sup>62</sup> to ensure that providers and organizations cannot be subjected to discrimination for providing adoption and foster care services based on their beliefs about marriage.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 argued that children raised in same-sex marriages compared to heterosexual marriages are more likely to be unstable, and that “programs should affirm that children require and deserve both the love and nurturing of a mother and the play and protection of a father.”** “Protect faith-based grant recipients from religious liberty violations and maintain a biblically based, social science–reinforced definition of marriage and family. Social science reports that assess the objective outcomes for children raised in homes aside from a heterosexual, intact marriage are clear: All other family forms involve higher levels of instability (the average length of same-sex marriages is half that of heterosexual marriages); financial stress or poverty; and poor behavioral, psychological, or educational outcomes. For the sake of child well-being, programs should affirm that children require and deserve both the love and nurturing of a mother and the play and protection of a father. Despite recent congressional bills like the Respect for Marriage Act that redefine marriage to be the union between any two individuals, HMRE program grants should be available to faith-based recipients who affirm that marriage is between not just any two adults, but one man and one unrelated woman.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended withdrawing Ryan White guidance that allows “funds to pay for cross-sex transition support.”** “Withdraw Ryan White guidance allowing funds to pay for cross-sex transition support. HRSA should withdraw all guidance encouraging Ryan White HIV/AIDS Program service providers to provide controversial ‘gender transition’ procedures or ‘gender-affirming care,’ which cause irreversible physical and mental harm to those who receive them.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Married men and women are the ideal, natural family structure because all children have a right to be raised by the men and women who conceived them.”** “The Secretary’s antidiscrimination policy statements should never conflate sex with gender identity or sexual orientation. Rather, the Secretary should proudly state that men and women are biological realities that are crucial to the advancement of life sciences and medical care and that married men and women are the ideal, natural family structure because all children have a right to be raised by the men and women who conceived them.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

## Centers for Medicare and Medicaid Services

**Project 2025 on Medicare and Medicaid: “They operate as runaway entitlements that stifle medical innovation, encourage fraud, and impede cost containment.”** “With the goal of being a societal safety net, Medicare and Medicaid touch more American lives than does any other federal program. While they help many, they operate as runaway entitlements that stifle medical innovation, encourage fraud, and impede cost containment, in addition to which their fiscal future is in peril.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

### Medicare

**Project 2025 called for the repeal of the Inflation Reduction Act and the Medicare Shared Savings Program.** “Repeal harmful health policies enacted under the Obama and Biden Administrations such as the Medicare Shared Savings Program and Inflation Reduction Act.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the repeal of the provision in the IRA allowing Medicare to negotiate prices for prescription drugs.** “The Inflation Reduction Act (IRA) created a drug price negotiation program in Medicare that replaced the existing private-sector negotiations in Part D with government price controls for prescription drugs. These government price controls will limit access to medications and reduce patient access to new medication. This ‘negotiation’ program should be repealed, and reforms in Part D that will have meaningful impact for seniors should be pursued.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the reduction in the government’s share in the catastrophic tier of Medicare.** “Other reforms should include eliminating the coverage gap in Part D, reducing the government share in the catastrophic tier, and requiring manufacturers to bear a larger share.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposed making Medicare Advantage “the default enrollment option.”** “Make Medicare Advantage the default enrollment option.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposed making Medicare Advantage “Remove restrictions on key benefits and services, including those related to prescription drugs, hospice care, and medical savings account plans.”** “2. Give beneficiaries direct control of how they spend Medicare dollars. 3. Remove burdensome policies that micromanage MA plans. 4. Replace the complex formula-based payment model with a competitive bidding model. 5. Reconfigure the current risk adjustment model. 6. Remove restrictions on key benefits and services, including those related to prescription drugs, hospice care, and medical savings account plans.26.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

- **HEADLINE: “Republicans Are Planning To Totally Privatize Medicare – And Fast.”** [Rolling Stone, [2/5/24](#)]
- **Rolling Stone: Making Medicare Advantage the default enrollment option “would hasten the end of the traditional Medicare program” and benefit private health insurers.** “One item buried in the 887-page blueprint has attracted little attention thus far, but would have a monumental impact on the health of America’s seniors and the future of one of America’s most popular social programs: a call to ‘make Medicare Advantage the default enrollment option’ for people who are newly eligible for Medicare. Such a policy would hasten the end of the traditional Medicare program, as well as its foundational premise: that seniors can go to any doctor or provider they choose. The change would be a boon for private health insurers — which generate massive profits and growing portions of their revenues from Medicare Advantage plans — and

further consolidate corporate control over the United States health care system.” [Rolling Stone, [2/5/24](#)]

**Project 2025 recommended using AI to detect waste, fraud, and abuse in Medicare.** “Reduce waste, fraud, and abuse, including through the use of artificial intelligence for their detection.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

## **Medicaid**

**Project 2025 proposed allowing Medicaid to change funding systems, which “should include a more balanced or blended match rate, block grants, aggregate caps, or per capita caps.”** “Reform financing. Allow states to have a more flexible, accountable, predictable, transparent, and efficient financing mechanism to deliver medical services. This system should include a more balanced or blended match rate, block grants, aggregate caps, or per capita caps. Any financial system should be designed to encourage and incentivize innovation and the efficient delivery of health care services. Federal and state financial participation in the Medicaid program should be rational, predictable, and reasonable. It should also incentivize states to save money and improve the quality of health care.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged CMS to “replace the enhanced match rate with a fairer more rational rate” and “restructure basic financing.”** “I Direct dollars to beneficiaries more effectively and responsibly. The current funding structure for the Medicaid program rewards expansions, lacks transparency, and promotes financing gimmicks. CMS should: 1. End state financing loopholes. 2. Reform payments to hospitals for uncompensated care. 3. Replace the enhanced match rate with a fairer and more rational match rate. 4. Restructure basic financing and put the program on a more fiscally predictable budget (which should include reform of Disproportionate Share Hospital payments to hospitals).3.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged CMS to “incentivize personal responsibility” and consumer choice for Medicaid recipients.** “Incentivize personal responsibility. CMS should allow states to ensure that Medicaid recipients have a stake in their personal health care and a say in decisions related to the Medicaid program. Personal responsibility and consumer choice for Medicaid recipients must go together as standard components of the safety net, especially for able-bodied recipients. Medicaid recipients, like the rest of Americans, should be given both the freedom to choose their health plans and the responsibility to contribute to their health care costs at a level that is appropriate to protect the taxpayer.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025: CMS should allow families to use Medicaid funding to obtain coverage outside the Medicaid program as part of a “personal option.”** “Because Medicaid serves a broad and diverse group of individuals, it should be flexible enough to accommodate different designs for different groups. For example, CMS should launch a robust ‘personal option’ to allow families to use Medicaid dollars to secure coverage outside of the Medicaid program.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025: CMS should tell states they “have the ability to adopt work incentives for able-bodied individuals” for Medicaid.** “CMS should also: 1. Clarify that states have the ability to adopt work incentives for able-bodied individuals (similar to what is required in other welfare programs) and the ability to broaden the application of targeted premiums and cost sharing to higher-income enrollees.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposed that CMS “Add targeted time limits or lifetime caps on benefits to disincentivize permanent dependence.”** [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposed that Congress should allow states to contribute to a private insurance benefit for all members of a family in a flex account.** “Allow private health insurance. Congress should

allow states the option of contributing to a private insurance benefit for all members of the family in a flexible account that rewards healthy behaviors. This reform should also allow catastrophic coverage combined with an account similar to a health savings account (HSA) for the direct purchase of health care and payment of cost sharing for most of the population.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025: “CMS should add flexibility to eliminate obsolete mandatory and optional benefit requirements and, for able-bodied recipients, eliminate benefit mandates that exceed those in the private market.”** “Increase flexible benefit redesign without waivers. CMS should add flexibility to eliminate obsolete mandatory and optional benefit requirements and, for able-bodied recipients, eliminate benefit mandates that exceed those in the private market. This should include flexibility to redesign eligibility, financing, and service delivery of long-term care to serve the most vulnerable and truly needy and eliminate middle-income to upper-income Medicaid recipients.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

### Health Care

**Project 2025: “Health care reform should be patient-centered and market-based and should empower individuals to control their health care–related dollars and decisions.”** “Basic economics holds that costs tend to decrease and quality and options tend to increase when there is robust and free competition in the provision of goods and services. Health care is no exception. Health care reform should be patient-centered and market-based and should empower individuals to control their health care–related dollars and decisions.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 wrote that “states should be the primary regulators of the medical profession.”** “Of course, providers who deliver health care also need the freedom to address the unique needs of their patients. States should be the primary regulators of the medical profession, and the federal government should not restrict providers’ ability to discharge their responsibilities or limit their ability to innovate through government pricing controls or irrational Medicare and Medicaid reimbursement schemes.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

### Head Start

**Project 2025 argued the federal Head Start program should be eliminated, along with the entire Office of Head Start.** “Eliminate the Head Start program. Head Start, originally established and funded to support low-income families, is fraught with scandal and abuse. With a budget of more than \$11 billion, the program should function to protect and educate minors. Sadly, it has done exactly the opposite. In fact, ‘approximately 1 in 4 grant recipients had incidents in which children were abused, left unsupervised, or released to an unauthorized person between October 2015 and May 2020.’<sup>68</sup> Research has demonstrated that federal Head Start centers, which provide preschool care to children from low-income families, have little or no long-term academic value for children. Given its unaddressed crisis of rampant abuse and lack of positive outcomes, this program should be eliminated along with the entire OHS. At the very least, the program’s COVID-19 vaccine and mask requirements should be rescinded.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

### Hurt Non-Traditional Families

**Project 2025 recommended repealing and replacing Biden HHS policies that focus on “LGBTQ+ equity, subsidizing single-motherhood, disincentivizing work, and penalizing marriage.** “Families comprised of a married mother, father, and their children are the foundation of a well-ordered nation and healthy society. Unfortunately, family policies and programs under President Biden’s HHS are fraught with agenda items focusing on ‘LGBTQ+ equity,’ subsidizing single-motherhood, disincentivizing work, and penalizing marriage. These policies should be repealed and replaced by policies that support the

formation of stable, married, nuclear families.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants HHS to prioritize marriage father engagement because homes with non-related boyfriends “Are among the most dangerous place for a child to be.”** “Working fathers are essential to the well-being and development of their children, but the United States is experiencing a crisis of fatherlessness that is ruining our children’s futures. In the overwhelming number of cases, fathers insulate children from physical and sexual abuse, financial difficulty or poverty, incarceration, teen pregnancy, poor educational outcomes, high school failure, and a host of behavioral and psychological problems. By contrast, homes with non-related ‘boyfriends’ present are among the most dangerous place for a child to be. HHS should prioritize married father engagement in its messaging, health, and welfare policies.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025: “HHS policies should never place the desires of adults over the right of children to be raised by the biological fathers and mothers who conceive them.”** “In the context of current and emerging reproductive technologies, HHS policies should never place the desires of adults over the right of children to be raised by the biological fathers and mothers who conceive them. In cases involving biological parents who are found by a court to be unfit because of abuse or neglect, the process of adoption should be speedy, certain, and supported generously by HHS.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 pushed the prioritization of funding home-based childcare by parents or family instead of universal childcare.** “Prioritize funding for home-based childcare, not universal day care. As HRSA’s Early Childhood Health page outlines, ‘Currently, only about half of U.S. preschoolers are on-track with their development and ready for school. And more than one in four of children (28%) who experience abuse or neglect are under 3 years old.’<sup>72</sup> Concurrently, children who spend significant time in day care experience higher rates of anxiety, depression, and neglect as well as poor educational and developmental outcomes. Instead of providing universal day care, funding should go to parents either to offset the cost of staying home with a child or to pay for familial, in-home childcare.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

## CDC

**Project 2025 called the CDC “the most incompetent and arrogant agency in the federal government.”** “COVID-19 exposed the Centers for Disease Control and Prevention (CDC) as perhaps the most incompetent and arrogant agency in the federal government. CDC continually misjudged COVID-19, from its lethality, transmissibility, and origins to treatments. We were told masks were not needed; then they were made mandatory. CDC botched the development of COVID tests when they were needed most. When it was too late, we were told to put our lives on hold for ‘two weeks to flatten the curve;’ that turned into two years of interference and restrictions on the smallest details of our lives. Congress should ensure that CDC’s legal authorities are clearly defined and limited to prevent a recurrence of any such arbitrary and vacillating exercise of power.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended that the CDC be split into two separate entities.** “The CDC should be split into two separate entities housing its two distinct functions. On the one hand, the CDC is now responsible for collecting, synthesizing, and publishing epidemiological data from the individual states—a scientific data-gathering function. This information is crucial for medical and public health researchers around the country. On the other hand, the CDC is also responsible for making public health recommendations and policies—an inescapably political function. At times, these two functions are in tension or clear conflict. In February 2022, for example, it was reported that ‘[t]wo full years into the pandemic, the agency leading the country’s response to the public health emergency has published only a tiny fraction of the data it has collected,’ much of which ‘could [have helped] state and local health officials better target their efforts to bring the virus under control.’ A CDC spokesman said that one of the

reasons was ‘fear that the information might be misinterpreted.’4.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 on the CDC: “how much risk mitigation is worth the price of shutting down churches on the holiest day of the Christian calendar and far beyond as happened in 2020? What is the proper balance of lives saved versus souls saved?”** “The CDC can and should make assessments as to the health costs and benefits of health interventions, but it has limited to no capacity to measure the social costs or benefits they may entail. For example, how much risk mitigation is worth the price of shutting down churches on the holiest day of the Christian calendar and far beyond as happened in 2020? What is the proper balance of lives saved versus souls saved? The CDC has no business making such inherently political (and often unconstitutional) assessments and should be required by law to stay in its lane.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 criticized the “overreaching policies during the pandemic” and the state of emergency that legally justified it.** “Every one of the overreaching policies during the pandemic—from lockdowns and school closures to mask and vaccine mandates or passports—received its supposed legal justification from the state of emergency declared (and renewed) by the HHS Secretary. Tellingly, however, the threshold for what constitutes a public health emergency—how many cases, hospitalizations, deaths, etc.—was never defined. For the sake of democratic accountability, we must know with clarity what will trigger the next emergency declaration and, just as important, what will trigger its end.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025: “DC guidance must be prohibited from taking on a prescriptive character. For example, never again should CDC officials be allowed to say in their official capacity that school children ‘should be’ masked or vaccinated (through a schedule or otherwise) or prohibited from learning in a school building.”** “By statute or regulation, CDC guidance must be prohibited from taking on a prescriptive character. For example, never again should CDC officials be allowed to say in their official capacity that school children ‘should be’ masked or vaccinated (through a schedule or otherwise) or prohibited from learning in a school building. Such decisions should be left to parents and medical providers. We have learned that when CDC says what people ‘should’ do, it readily becomes a ‘must’ backed by severe punishments, including criminal penalties. CDC should report on the risks and effectiveness of all infectious disease-mitigation measures dispassionately and leave the ‘should’ and ‘must’ policy calls to politically accountable parties.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended decommissioning the NIH Foundation.** “The CDC and NIH Foundations, whose boards are populated with pharmaceutical company executives, need to be decommissioned. Private donations to these foundations—a majority of them from pharmaceutical companies—should not be permitted to influence government decisions about research funding or public health policy.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 would urge the HHS Office of General Counsel to: “Rescind legal analysis that authorized HHS to impose a moratorium on rental evictions during COVID.”** [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

## NIH

**Project 2025 wrote that Congress should consider block granting NIH’s grant budget to states.** “The NIH monopoly on directing research should be broken. Term limits should be imposed on top career leaders at the NIH, and Congress should consider block granting NIH’s grants budget to states to fund their own scientific research. Nothing in this system would prevent several states from partnering to co-fund large research projects that require greater resources or impact larger regions. Likewise, the establishment of funding for scientific research at the state level does not preclude more modest federal funding through the National Institutes of Health: The two models are not mutually exclusive.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended decommissioning the NIH Foundation.** “The CDC and NIH Foundations, whose boards are populated with pharmaceutical company executives, need to be decommissioned. Private donations to these foundations—a majority of them from pharmaceutical companies—should not be permitted to influence government decisions about research funding or public health policy.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 argued that the NIH Office of Equity, Diversity, and Inclusion should be abolished.** “Under Francis Collins, NIH became so focused on the #MeToo movement that it refused to sponsor scientific conferences unless there were a certain number of women panelists, which violates federal civil rights law against sex discrimination. This quota practice should be ended, and the NIH Office of Equity, Diversity, and Inclusion, which pushes such unlawful actions, should be abolished.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

## Affordable Care Act

**Project 2025 proposed removing restrictions on physician-owned hospitals that were imposed in the ACA.** “Remove restrictions on physician-owned hospitals. The Affordable Care Act (ACA)<sup>24</sup> imposed restrictions prohibiting Medicare from reimbursing physician-owned and specialty hospitals. The current restrictions do little more than serve the special interests of large hospital systems and undercut consumer choice of high-quality, specialty care. These restrictions should be removed so that physician-owned hospitals can compete with other hospitals in serving Medicare patients.<sup>25</sup>” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposed separating insurance plans from the subsidized ACA exchange from the non-subsidized market.** “Separate the subsidized ACA exchange market from the non-subsidized insurance market. The Affordable Care Act has made insurance more expensive and less competitive, and the ACA subsidy scheme simply masks these impacts. To make health insurance coverage more affordable for those who are without government subsidies, CMS should develop a plan to separate the non-subsidized insurance market from the subsidized market, giving the non-subsidized market regulatory relief from the costly ACA regulatory mandates.<sup>3</sup>” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025: “DPC’s fixed fee for care does not constitute insurance in the context of health savings accounts.”** “Remove barriers to direct primary care. Direct primary care (DPC) is an innovative health care delivery model in which doctors contract directly with patients for their care on a subscription basis regardless of how or where the care is provided. The DPC model is improving patient access, driving higher quality and lower cost, and strengthening the doctor– patient relationship. DPC has faced many challenges from government policymakers, including overly exuberant attempts at regulation and misclassification. Changes should clarify that DPC’s fixed fee for care does not constitute insurance in the context of health savings accounts.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

## Abstinence

**Project 2025 recommended that people should “delay sex to prevent pregnancy” so they would not have to be on TANF.** “Additionally, TANF priorities are not implemented in an equally weighted way. Marriage, healthy family formation, and delaying sex to prevent pregnancy are virtually ignored in terms of priorities, yet these goals can reverse the cycle of poverty in meaningful ways. CMS should require explicit measurement of these goals.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 wanted to ensure both Teen Pregnancy Prevention and Personal Responsibility Education Programs should ensure they “do not promote abortion or high-risk sexual behavior among adolescents.”** “Teen Pregnancy Prevention (TPP) and Personal Responsibility Education

Program (PREP). TPP is operated by the Office of Population Affairs in the Office of the Assistant Secretary for Health; PREP is operated by the ACF Office of Planning, Research, and Evaluation. Both programs should ensure that there is better reporting of subgrantees and referral lists so that they do not promote abortion or high-risk sexual behavior among adolescents.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Sexual Risk Avoidance programs at ACF and OASH should get equal funding.** “CMS should ensure that Sexual Risk Avoidance (SRA) proponents receive these grants and are given every opportunity to prove their effectiveness. SRA programs, both at ACF and at OASH and both discretionary and mandatory, should be equal in funding and emphasis. Qualitative research should be conducted on both types of programs to ensure continuous improvement.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 seemed to argue that sex education would “promote prostitution, or provide a funnel effect for abortion facilities and school field trips to clinics.”** “In addition, certain provisions should be employed so that these programs do not serve as advocacy tools to promote sex, promote prostitution, or provide a funnel effect for abortion facilities and school field trips to clinics, or for similar purposes. Parent involvement and parent–child communication should be encouraged and be a part of any funded project. Risk avoidance should be prioritized, and any program that submits a proposal that promotes risk rather than health should not be eligible for funding. Site visits should be revamped to ensure adherence to these optimal health metrics, and a cost analysis of programming as compared to students served should be a metric in funding (taking into account that in certain cases, intensive programs will serve fewer students and can have more positive results). These same parameters should apply to sex education programs at ACF. Any lists with ‘approved curriculum’ or so-called evidence-based lists should be abolished; HHS should not create a monopoly of curriculum, adding to the profit of certain publishers. Furthermore, lists created in the past have given priority to sex-promotion textbooks. HHS should create a list of criteria for evaluating the sort of curriculum that should be selected for any sex education grant programs, both at OASH and at ACF, with the aim of promoting optimal health and adhering to the legislative language of each program.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended using Healthy Marriage and Relationship Education funding or grants for high school education resources and curriculum on sexual risk avoidance.** “Utilize HMRE funding or grants to provide state-level high school education resources and curriculum on healthy marriages, sexual risk avoidance, and healthy relationships. Early interventions and prevention are much more cost-effective than are efforts to reach people already in broken relationships.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

## Labor

### Highlights

- ✓ Recommends maximizing the hiring of political appointees at DOL and implementing a hiring freeze for career officials.
- ✓ Would eliminate all DEI initiatives, including Critical Race Theory trainings.
- ✓ Would ban the EEOC from collecting demographic data, making it more difficult to prove discrimination at a workplace.
- ✓ Explicitly states that discrimination on the basis of sexual orientation, gender identity, and transgender status should be legal.
- ✓ Recommended not providing accommodations or benefits for employees that have an abortion.



- ✓ Recommended gutting NLRB and EEOC by: firing their general counsels on Day One, reorienting their enforcement priorities, and raising the revenue threshold at which NLRB would have jurisdiction over a business.
- ✓ Recommended waiving DOL’s hazard-order regulations to allow teenagers to work “inherently dangerous jobs” in “dangerous fields.”
- ✓ Pushed anti-union policies including:
  - Discarding “card check” as the basis of union recognition.
  - Allowing Office of Labor-Management Standards to investigate unions without a formal complaint.
  - Eliminating the contract bar rule so it is easier to decertify a union.
- ✓ Recommended immediately capping and then phasing down the H-2A visa program.
- ✓ Questions whether public sector unions are necessary or legal.
- ✓ Recommends creating “Employee Involvement Organizations” that are controlled by company management primarily to dilute union membership and establish an “alternative” to labor unions as “cooperatives” without any real power for workers.

### Spending Cuts

**Project 2025 called for budget cuts on the low end of the historical average, \$10.9 billion for DOL as an example.** “Reduce the agencies’ budgets to the low end of the historical average. The Trump Administration’s FY 2020 request, \$10.9 billion, would provide a workable target for spending reductions for DOL, for example. Spending reductions should occur primarily in the Employment and Training Administration (ETA). Focus health and safety inspections on egregious offenders, as other inspections are often abused and usurp state and local government prerogatives.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

### Politicize the Department

**Project 2025 said the next president should “maximize hiring of political appointees” at DOL.** “Maximize hiring of political appointees. At its best, the Trump Administration Department of Labor worked with up to 150 political appointees. That is still a tiny percentage of the department. The number of political appointees should be maximized in order to improve the political accountability of the department.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the implementation of a hiring freeze at DOL for career officials.** “Implement a hiring freeze for career officials. A hiring freeze imposes financial discipline on agencies’ personnel costs and reduces agency bloat.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

### Ban Diversity Initiatives

**Project 2025 argued in favor of eliminating all DEI initiatives.** “Reverse the DEI Revolution in Labor Policy. Under the Obama and Biden Administrations, labor policy was yet another target of the Diversity, Equity, and Inclusion (DEI) revolution. Under this managerialist left-wing race and gender ideology, every aspect of labor policy became a vehicle with which to advance race, sex, and other classifications and discriminate against conservative and religious viewpoints on these subjects and others, including pro-life views. The next Administration should eliminate every one of these wrongful and burdensome ideological projects.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommends eliminating CRT trainings and racial classifications.** “Eliminate Racial Classifications and Critical Race Theory Trainings. The Biden Administration has pushed ‘racial equity’ in every area of our national life, including in employment, and has condoned the use of racial classifications and racial preferences under the guise of DEI and critical race theory, which categorizes individuals as oppressors and victims based on race. Nondiscrimination and equality are the law; DEI is not. Title VII flatly prohibits discrimination in employment on the basis of race, color, and national origin.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

## Enable Discrimination

**Project 2025 recommends eliminating EEO-1 data collection since the demographic data could be used to allege racial discrimination.** “Eliminate EEO-1 data collection. The Equal Employment Opportunity Commission collects EEO-1 data on employment statistics based on race/ ethnicity, which data can then be used to support a charge of discrimination under a disparate impact theory. This could lead to racial quotas to remedy alleged race discrimination. (The Office of Federal Contract Compliance Programs (OFCCP) also has a right to the data EEOC collects.) Crudely categorizing employees by race or ethnicity fails to recognize the diversity of the American workforce and forces individuals into categories that do not fully reflect their racial and ethnic heritage.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged amending Title VII to prohibit EEOC from collecting EEO-1 data and any other racial classifications for public and private workplaces.** “Amend Title VII. The next Administration should work with Congress to amend Title VII to prohibit the Equal Employment Opportunity Commission from collecting EEO-1 data and any other racial classifications in employment for both private and public workplaces.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the elimination of disparate impact liability.** “Eliminate disparate impact liability. With interracial marriages in America increasing, many Americans do not fit neatly into crude racial categories.<sup>1</sup> Under disparate impact theory, moreover, discriminatory motive or intent is irrelevant; the outcome is what matters. But all workplaces have disparities.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

- **Project 2025 urged Congress to eliminate disparate impact as a valid theory of discrimination.** “Congress should: I Eliminate disparate impact as a valid theory of discrimination for race and other bases under Title VII and other laws. Disparities do not (and should not legally) imply discrimination per se.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]
- **Project 2025 urged the next president to sign an EO forbidding OFCCP from using disparate impact in its analysis.** “Sign an executive order explicitly forbidding OFCCP from using disparate impact in its analysis.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on Congress to make it more explicit in Title VII that religious “employers may make employment decisions based on religion regardless of nondiscrimination laws.”** “Clarify Title VII’s religious organization exemptions. Congress should clarify Title VII’s religious organization exemptions to make it more explicit that those employers may make employment decisions based on religion regardless of nondiscrimination laws.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

- **Project 2025 wants the next president to “enact policies with robust respect for religious exercise in the workplace.”** “Provide robust protections for religious employers. America’s religious diversity means that workplaces include people of many faiths and that many employers are faith-based. Nevertheless, the Biden Administration has been hostile to people of faith, especially those with traditional beliefs about marriage, gender, and sexuality. The new

Administration should enact policies with robust respect for religious exercise in the workplace, including under the First Amendment, the Religious Freedom Restoration Act of 1993 (RFRA),<sup>8</sup> Title VII, and federal conscience protection laws.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

- **Project 2025 wants the next president to issue an EO protecting religious employers and employees.** “Issue an executive order protecting religious employers and employees. The President should make clear via executive order that religious employers are free to run their businesses according to their religious beliefs, general nondiscrimination laws notwithstanding, and support participation of religious employees and employers as federal contractors and in federal activities and programs.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

### **Allow Discrimination Based on Sexual Orientation and Gender Identity**

**Project 2025 called on a new president to restrict sex discrimination protections in regards to sexual orientation and transgender status in the context of hiring and firing.** “Restrict the application of *Bostock*. The new Administration should restrict *Bostock*’s application of sex discrimination protections to sexual orientation and transgender status in the context of hiring and firing.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the next president to “rescind regulations prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, and sex characteristics.”** “Rescind regulations prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, and sex characteristics. The President should direct agencies to rescind regulations interpreting sex discrimination provisions as prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, sex characteristics, etc.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the next president to eliminate OFCCP in part because “the President and DOL can force a huge swath of American employers to comply with rules and regulations based on novel anti-discrimination theories (such as sexual orientation and gender identity theories) that Congress had never imposed by statute.”** “Eliminate OFCCP. The Office of Federal Contract Compliance Programs (OFCCP) exists to enforce Executive Order (EO) 11246.2 That order was originally signed in 1965 to require federal contractors (and subcontractors) to commit to nondiscrimination. It gave enforcement authority to the Department of Labor, up to and including debarment from federal contracting. The Equal Employment Opportunity Commission has since grown, often making OFCCP’s authority redundant and imposing a second regulatory agency under whose rules businesses must operate. In addition, under EO 11246, the President and DOL can force a huge swath of American employers to comply with rules and regulations based on novel anti discrimination theories (such as sexual orientation and gender identity theories) that Congress had never imposed by statute.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommends the next president rescind EO 11246, which would eliminate OFCCP.** “Rescind EO 11246. The President should eliminate OFCCP by simply rescinding EO 11246. Federal contractors would still be bound by statutory nondiscrimination law but would no longer work under overlapping regimes. (Contractors’ residual obligations under Section 503 of the Rehabilitation Act and Vietnam Era Veterans’ Readjustment Assistance Act (VEVRAA) could be enforced by EEOC or DOL.) Contractors also would be less subject to the changing political whims of a President that might impose significant new costs or burdens on the contractors.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

### **Anti-Abortion Labor Laws**

**Project 2025 called on Congress to pass a law that clarified that no employer would be required to provide accommodations or benefits for abortion.** “Pass a law requiring equal (or greater) benefits for pro-life support for mothers and clarifying abortion exclusions. Congress should pass a law requiring that to the extent an employer provides employee benefits for abortion, it must provide equal or greater benefits for pregnancy, childbirth, maternity, and adoption. That law should also clarify that no employer is required to provide any accommodations or benefits for abortion.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants Congress and DOL to clarify that the Employee Retirement Income Security Act “does not preempt states’ power to restrict abortion” or surrogacy.** “Keep anti-life ‘benefits’ out of benefit plans. Some benefits attorneys and pro-choice advocates have argued since the Supreme Court’s *Dobbs v. Jackson Women’s Health Organization* decision that the longstanding doctrine of Employee Retirement Income Security Act of 1974 (ERISA)7 preemption should block individual states’ efforts to prohibit employers from helping employees procure abortions via offering various kinds of coverage under employee-sponsored benefit plans. ERISA should not be allowed to trump states’ ability to protect innocent human life in the womb. Congress and DOL should clarify that ERISA does not preempt states’ power to restrict abortion, surrogacy, or other anti-life ‘benefits.’” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

### **Gut the EEOC and NLRB**

**Project 2025 said EEOC and NLRB should have new general counsels appointed on Day One.** “Appoint new EEOC and NLRB general counsels on Day One. The Biden Administration broke significant precedent by firing the EEOC and NLRB general counsels despite their term appointments. The next Administration should do the same and expand on the Biden Administration’s new precedent by refusing to acknowledge terms in other offices, where applicable, and installing acting or full new officers immediately.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 said EEOC “should disclaim its regulatory pretensions” since it does not have rulemaking authority under Title VII and other laws it enforces.** “General EEOC Reforms. The Equal Employment Opportunity Commission (EEOC) does not have rulemaking authority under Title VII and other laws it enforces, yet it issues ‘guidance,’ ‘technical assistance,’ and other documents, including some that push new policy positions. EEOC should disclaim its regulatory pretensions and abide by the guidance reforms discussed below.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 said “EEOC should disclaim power to enter into consent decrees that require employer actions that it could not require under the laws it enforces.** “Disclaim power to enter into consent decrees. EEOC should disclaim power to enter into consent decrees that require employer actions that it could not require under the laws it enforces.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended EEOC reorient its enforcement priorities towards “failure to accommodate disability, religion and pregnancy (but not abortion).”** “Reorient enforcement priorities. EEOC should reorient its enforcement priorities toward claims of failure to accommodate disability, religion, and pregnancy (but not abortion).” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for increasing revenue thresholds at which the NLRB asserts jurisdiction over employers.** “Congress should enact legislation increasing the revenue thresholds at which the National Labor Relations Board asserts jurisdiction over employers to match changes in inflation that have occurred since 1935 and better reflect the definition of ‘small business’ used by the federal government.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

## Change DOL's Women's Bureau

**Project 2025 called on the DOL's Women's Bureau to “rededicate their research budget towards open inquiry, especially to [...] understand the true causes of earnings gaps between men and women.”** “DOL should commit to honest study of the challenges for women in the world of professional work. The Women's Bureau at DOL tends towards a politicized research and engagement agenda that puts predetermined conclusions ahead of empirical study. The Bureau should rededicate its research budget towards open inquiry, especially to disentangle the influences on women's workforce participation and to understand the true causes of earnings gaps between men and women.” [Department of Labor and Related Agencies, Chapter 18, Project 2025, accessed [6/24/24](#)]

## Allow Children To Work Dangerous Jobs

**Project 2025 recommended that DOL amends their hazard-order regulations to allow teenage workers to work “dangerous jobs” in “dangerous fields.”** “Hazard-Order Regulations. Some young adults show an interest in inherently dangerous jobs. Current rules forbid many young people, even if their family is running the business, from working in such jobs. This results in worker shortages in dangerous fields and often discourages otherwise interested young workers from trying the more dangerous job. With parental consent and proper training, certain young adults should be allowed to learn and work in more dangerous occupations. This would give a green light to training programs and build skills in teenagers who may want to work in these fields. I DOL should amend its hazard-order regulations to permit teenage workers access to work in regulated jobs with proper training and parental consent.” [Department of Labor and Related Agencies, Chapter 18, Project 2025, accessed [6/24/24](#)]

## Exempt Small Businesses from Certain Regulations and OSHA Fines

**Project 2025 called for small businesses to be exempted from regulations “where possible.”** “Exemptions from Regulations for Small Business. Burdensome regulations have anti-competitive effects. In general, larger, higher-margin businesses are better able to absorb the costs of regulatory compliance than are small businesses, and under the Biden Administration, big-business lobbies have affirmatively embraced certain regulations (such as the COVID vaccine mandate for private employers) to reduce competition from smaller businesses. Research suggests that labor regulations may pose the highest aggregate regulatory cost for small businesses. I The labor agencies should exercise their available discretion and duties under the Regulatory Flexibility Act<sup>12</sup> to exempt small entities from regulations where possible.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for Congress and DOL to exempt small business, first-time, non-willful violators from OSHA fines.** “Congress (and DOL, in its enforcement discretion) should exempt small business, first-time, non-willful violators from fines issued by the Occupational Health and Safety Administration.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

## Apprenticeship Programs

**Project 2025: Religious organizations should be encouraged to participate in apprenticeship programs.** “In addition, religious organizations should be encouraged to participate in apprenticeship programs. America has a long history of religious organizations working to advance the dignity of workers and provide them with greater opportunity, from the many prominent Christian and Jewish voices in the early labor movement to the ‘labor priests’ who would appear on picket lines to support their flocks. Today, the role of religion in helping workers has diminished, but a country committed to strengthening civil society must ask more from religious organizations and make sure that their important role is not impeded by regulatory roadblocks or the bureaucratic status quo. Encourage and enable religious organizations to participate in apprenticeship programs, etc. Both DOL and NLRB should facilitate religious organizations helping to strengthen working families via apprenticeship programs, worker

organizations, vocational training, benefits networks, etc.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

### **Telling Private Companies How To Hire**

**Project 2025 recommends prohibiting the use of a BA degree requirement in job descriptions for all private sector employers.** “Prohibit the use of a BA requirement in job descriptions. Congress should prohibit the inclusion of a BA requirement in job descriptions for all private sector employers, or the use of a BA requirement to screen applicants using algorithms, except where a BA from a particular type of institution or in a particular field is a bona fide requirement of the position.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

### **Union Crack Downs**

**Project 2025 called for the Office of Labor-Management Standards to be allowed to investigate unions without receiving a formal complaint.** “Office of Labor-Management Standards Initiative. Currently, the Office of Labor-Management Standards (OLMS) may investigate potential employer malfeasance with regard to union funds in the absence of any complaint by a worker or union but may not do the same with regard to potential union malfeasance. If OLMS has evidence that a union may be violating the law based on information available to the agency (such as annual financial disclosure reports, information developed during an audit of a union’s books and records, or information obtained from other government agencies) it should be permitted to open an investigation. It should have the same enforcement tools available for both employers and unions. I Revise investigation standards. The Office of Labor-Management Standards should revise its investigation standards to authorize investigations without receiving a formal complaint.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Congress should discard ‘card check’ as the basis of union recognition and mandate the secret ballot exclusively.”** “Discard ‘card check.’ Congress should discard ‘card check’ as the basis of union recognition and mandate the secret ballot exclusively.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the NLRB eliminate the contract bar rule so employees can more easily decertify their union.** “Contract Bar Rule. Although current labor law allows a union to establish itself at a workplace at more or less any time, the calendar for any attempt to decertify a union is considerably more constrained. If a union is recognized as a collective bargaining agent, then employees may not decertify it or substitute another union for it for at least one year under federal law (the ‘certification bar’). Similarly, when a union reaches a collective bargaining agreement with an employer, it is immune from a decertification election for up to three years (the ‘contract bar’). A typical consequence of these rules is that employees must often wait four years before they are allowed a chance at decertification. Employees then have only a 45-day window to file a decertification petition; if the employer and union sign a successor contract, then the contract bar comes into play once again—meaning employees with an interest in decertification must wait another three years. I Eliminate the contract bar rule. NLRB should eliminate the contract bar rule so that employees with an interest in decertification have a reasonable chance to achieve their goal.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**The Office of Labor-Management Standards budget should be increased to emphasize the enforcement of union disclosure.** “More generally, OLMS, which is charged with enforcing the law of union disclosure, has historically been underfunded when compared to other DOL agencies. This relative lack of funding has made ensuring disclosure more difficult. I Enact transparency rules. The substance of the Intermediate Bodies Rule should pass into law, either through rulemaking or through legislation. The T-1 Trust Annual Report annual filing requirement should be restored. I Increase funding levels. Congress should expand the funding of the Office of Labor-Management Standards.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the NLRB to advance the position that political conflicts of interest by union leadership can support claims for breach of duty in a manner analogous to financial conflicts of interest.** “Duty of Fair Representation. Unions have a duty of fair representation to their members, yet they too often abuse that duty to use their members’ resources on left-wing culture-war issues that are unrelated, and in fact often harmful, to union members’ own interests. | The NLRB should take enforcement or amicus action advancing the position that political conflicts of interest by union leadership can support claims for breach of the duty of fair representation in a manner analogous to financial conflicts of interest and analogous to breaches of the fiduciary duty of loyalty in other areas of law.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the NLRB reverse their interpretations of “protected concerted activity” around forming a union, and said they should return to the 2019 Alstate Maintenance interpretation.** “Interpreting ‘Protected Concerted Activity.’ In an effort to prevent employers from retaliating against workers who express a desire to unionize, certain activities are deemed ‘protected concerted activity’ (under §7 of the NLRA). The NLRB has issued extreme interpretations of these activities, such as determining that a business’s requiring its employees to be courteous to customers and one another is an unlawful infringement on the free speech rights implicit in the protected concerted activity protections in the NLRA. | Reverse unreasonable interpretations of ‘protected concerted activity.’ The NLRB should return to the 2019 Alstate Maintenance interpretation of what does and does not constitute protected concerted activity, including listing eight instances of lawful actions by employers.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

## Union Alternatives

**Project 2025 recommended the passage of the TEAM Act, which would allow formal worker-management cooperative organizations, create Employees Involvement Organizations, and allow EIOs at large companies to elect a non-voting member to a company’s board of directors.** “Congress should reintroduce and pass the Teamwork for Employees and Managers (TEAM) Act of 2022.<sup>18</sup> The TEAM Act: 1. Reforms the National Labor Relations Act’s (NLRA) Section 8(a)(2) prohibition on formal worker–management cooperative organizations like works councils. 2. Creates an ‘Employee Involvement Organization’ (EIO) to facilitate voluntary cooperation on critical issues like working conditions, benefits, and productivity. 3. Amends labor law to allow EIOs at large, publicly traded corporations to elect a non-voting, supervisory member of their company’s board of directors.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

## Ending PLAs and Davis-Bacon

**An “Alternative Policy” for Project 2025 argued federal agencies “should end all mandatory Project Labor Agreement requirements.”** “End PLA requirements. Agencies should end all mandatory Project Labor Agreement requirements and base federal procurement decisions on the contractors that can deliver the best product at the lowest cost.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**An “Alternative Policy” for Project 2025 would enact the Davis-Bacon Repeal Act.** “Repeal Davis–Bacon. Congress should enact the Davis–Bacon Repeal Act and allow markets to determine market wages.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

## Limiting Immigration

**Project 2025 recommended Congress “immediately cap” the H-2A visa program and establish a gradual phasedown over the next 10-20 years.** “The H-2A visa, meant to allow temporary agricultural workers into the United States, also suffers frequent employer abuse. The low cost of H-2A workers undercuts American workers in agricultural employment. The H-2A program is not subject to any statutory

numerical cap and has been expanding in recent years, surpassing 200,000 visa issuances for the first time in 2019. | Cap and phase down the H-2A visa program. Congress should immediately cap this program at its current levels and establish a schedule for its gradual and predictable phasedown over the subsequent 10 to 20 years, producing the necessary incentives for the industry to invest in raising productivity, including through capital investment in agricultural equipment, and increasing employment for Americans in the agricultural sector.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**An “Alternative View” in Project 2025 calls for the “phase out” of the H-2B visa program and the immediate cap on it.** “Phase out the H-2B visa program. The H-2B visa, for nonagricultural seasonal workers, suffers from many of the same harms and abuses as H-2A, albeit of lesser scope because of its cap and distribution across many sectors. Congress should immediately cap this program at its current levels and establish a schedule for its gradual and predictable phasedown over no more than 10 years.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**An Alternative View in Project 2025 said Congress should mandate that all new federal contracts require at least 70% of their employees be American citizens, with the percentage increasing to at least 95% over 10 years.** “Congress should mandate that all new federal contracts require at least 70 percent of the contractor’s employees to be U.S. citizens, with the percentage increasing to at least 95 percent over a 10-year period.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

## Unemployment

**Project 2025 called for staffing flexibility for state agencies administering unemployment benefits.** “Wagner–Peyser Staffing Flexibility. State agencies that administer unemployment benefits and workforce development programs should be able to hire the best people to do the job and should not be required to use state employees if a contractor can do the job better. Further, the federal government should not force a state to use non-union labor or union labor for these positions. | DOL should repromulgate the Trump-era staffing flexibility rule, and Congress should codify it.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

## Retirement Plans

**Project 2025 recommended that DOL prohibit investing in ERISA plans on the basis of any factors that are unrelated to investor risk and returns.** “DOL should prohibit investing in ERISA plans on the basis of any factors that are unrelated to investor risks and returns. | DOL should return to the Trump Administration’s approach of permitting only the consideration of pecuniary factors in ERISA. However, this approach should not preclude the consideration of legitimate non-ESG factors, such as corporate governance, supply chain investment in America, or family-supporting jobs.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

## Joint Employers

**Project 2025 recommended Congress pass a bill to codify the definition of joint employers based on direct and immediate control.** “DOL and NLRB should return to the long-standing approach to defining joint employers based on direct and immediate control. | Congress should enact the Save Local Business Act, which would codify the long-standing definition that has existed outside the Obama-era and Biden-proposed rules.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

## Education and Child Care



## Top Lines

- ✓ Eliminates the Department of Education.
- ✓ Recommends signing into law the Department of Education Reorganization Act (or Liquidating Authority Act) to direct the executive branch on how to devolve the agency as a stand-alone Cabinet-level department.
- ✓ Cuts programs managed by the Office of Elementary and Secondary Education.
- ✓ Cuts Title 1 programs by 10%, fully phasing out federal spending after 10 years.
- ✓ Eliminates the Head Start Program.
- ✓ Allows States to Opt Out Of Federal Education Programs.
- ✓ Transfers all Indian education programs to the Bureau of Indian Education.
- ✓ Calls for the funding of institutions to be block-granted and narrowed to HBCUs and tribally controlled colleges.
- ✓ Makes student data available by family structure.
- ✓ Rescinds new requirements for charter schools to receive federal grants that were implemented by the Biden administration.
- ✓ Prevents Critical Race Theory from being taught or discussed in schools.
- ✓ Cuts off federal funding for anyone who disagrees that “Schools serve parents, not the other way around”.
- ✓ Mandates court hearings for families who claim the federal government enforces any policy against parents in a way that “undermines their right and responsibility to raise, educate, and care for their children.”
- ✓ Eliminates the GEAR UP program, which provides grants to states and partnerships to provide services in high-poverty middle and high schools, and to provide college scholarships to low-income students.

### Student Aid

- ✓ Privatizes student loans and grants.
- ✓ Limits student loan forgiveness and rescinds existing programs.
- ✓ Terminates the Public Service Loan Forgiveness program and eliminates time and occupation-based student loan forgiveness.
- ✓ Recommends repealing the power of the Secretary to cancel, compromise, discharge, or forgive student loans to modify the repayment amounts or terms of Title IV student loans.
- ✓ Eliminates the PLUS loan program, which gives loans to graduate students and parents of undergraduate students.

### Special Education

- ✓ Calls for “most IDEA funding” to be converted into a no-strings formula block grant.
- ✓ Phases out earmarks for a variety of special institutions.
- ✓ Rescinds the regulation that says under Part B of IDEA that requires states to consider race and ethnicity in the disciplining of students with disabilities.
- ✓ Rescinds the Equity in IDEA regulation.

### Title IX, Title VI, and Athletics

- ✓ Rescinds the Biden administration’s Title IX regulations and restore those made by Betsy DeVos in 2020, and define “sex” to mean biological sex at birth.
- ✓ Narrows the definition of sexual harassment and directs schools to conduct live hearings with cross-examination for sexual misconduct investigations.
- ✓ Strengthens protections for faith-based educational institutions, programs, and activities.
- ✓ Calls for the next Administration to abandon the change redefining ‘sex’ to mean ‘sexual orientation and gender identity.’
- ✓ Calls for a regulation that said Title VI of the Civil Rights Act does not include a disparate impact standard.

- ✓ Directs the next Administration to take sweeping action to assure that the purpose of the Civil Rights Act is not inverted through a disparate impact standard to provide a pretext for “theoretically endless federal meddling”.

### Higher Education Act

- ✓ Prohibits accreditation agencies from “leveraging their Title IV gatekeeper role to mandate that educational institutions adopt diversity, equity, and inclusion policies.”
- ✓ Does not allow accreditation agencies to require standards that “undermine the religious beliefs of or require policies or conduct that conflict with” religious mission or beliefs of said institution.
- ✓ Calls for an executive order pursuing antitrust against college accreditors, especially the American Bar Association (ABA).

### Gender Identity

- ✓ Prohibits public education employees or contractors from using a name to address a student other than that listed on a student’s birth certificate or pronoun addressing a student if different from student’s biological sex without written permission.
- ✓ Allows education employees or contractors to not use a student’s preferred pronoun if it does not match that person’s biological sex if it is contrary to that employee’s religious or moral convictions.

## Eliminate DOE

**Project 2025: “The federal Department of Education should be eliminated.”** “Federal education policy should be limited and, ultimately, the federal Department of Education should be eliminated. When power is exercised, it should empower students and families, not government.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the redistribution of federal education programs across the government, and for the elimination of those they deem “ineffective or duplicative.”** “The next Administration will need a plan to redistribute the various congressionally approved federal education programs across the government, eliminate those that are ineffective or duplicative, and then eliminate the unproductive red tape and rules by entrusting states and districts with flexible, formula-driven block grants.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: “families and students do not need a Department of Education to learn, grow, and improve their lives.”** “Bolstered by an ever-growing cabal of special interests that thrive on federal largesse, the infrastructure that supports America’s costly federal intervention in education from early childhood through graduate school has entrenched itself. But, unlike the public sector bureaucracies, public employee unions, and the higher education lobby, families and students do not need a Department of Education to learn, grow, and improve their lives. It is critical that the next Administration tackle this entrenched infrastructure.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 said Congress must pass a “department of Education Reorganization Act or Liquidating Authority Act.** “In order to fully wind down the Department of Education, Congress must pass and the President must sign into law a Department of Education Reorganization Act (or Liquidating Authority Act) to direct the executive branch on how to devolve the agency as a stand-alone Cabinet-level department. Congress should pass and the next President should sign a Department of Education Reorganization Act.” [Department of Education, Project 2025, accessed [6/24/24](#)]

## Office of Elementary and Secondary Education

**Project 2025 would cut the number of programs managed by the Office of Elementary and Secondary Education.** “Reduce the number of programs managed by OESE, and transfer some

remaining programs to other federal agencies.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 would transfer Title I Part A, which funds lower-income school districts to HHS, and have it be administered through a block grant.** “Transfer Title I, Part A, which provides federal funding for lower-income school districts, to the Department of Health and Human Services, specifically the Administration for Children and Families. It should be administered as a no-strings-attached formula block grant.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Restore revenue responsibility for Title I funding to the states over a 10-year period.”** [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for all programs in OESE not listed to be either block-granted or eliminated.** “All other programs at OESE should be block-granted or eliminated.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposed allowing parents to use their child’s Title I resources to help pay for private learning options like tutoring and other materials.** “Initially, the responsibilities for administering and overseeing Title I should be moved to HHS, along with IDEA. Students attending schools that receive Title I spending should also have access to micro-education savings accounts that allow families to choose how and where their children learn according to their needs. Parents should be allowed to use their child’s Title I resources to help pay for private learning options including tutoring services and curricular materials. Over a 10-year period, the federal spending should be phased out and states should assume decision-making control over how to provide a quality education to children from low-income families.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the elimination of DOE-administered competitive grant programs and for Title I programs to be cut by 10%.** “Eliminate competitive grant programs and reduce spending on formula grant programs. Competitive grant programs operated by the Department of Education should be eliminated, and federal spending should be reduced to reflect remaining formula grant programs authorized under Title I of the Elementary and Secondary Education Act (ESEA) and the handful of other programs that do not fall under the competitive/ project grant category. Remaining programs managed by the Department of Education, such as large formula grant programs for K–12 education, should be reduced by 10 percent. This would cut approximately 29 programs, most of which are discretionary spending. In total, this would generate approximately \$8.8 billion in savings.” [Department of Education, Project 2025, accessed [6/24/24](#)]

## Head Start

**Project 2025 argued the federal Head Start program should be eliminated, along with the entire Office of Head Start.** “Eliminate the Head Start program. Head Start, originally established and funded to support low-income families, is fraught with scandal and abuse. With a budget of more than \$11 billion, the program should function to protect and educate minors. Sadly, it has done exactly the opposite. In fact, ‘approximately 1 in 4 grant recipients had incidents in which children were abused, left unsupervised, or released to an unauthorized person between October 2015 and May 2020.’<sup>68</sup> Research has demonstrated that federal Head Start centers, which provide preschool care to children from low-income families, have little or no long-term academic value for children. Given its unaddressed crisis of rampant abuse and lack of positive outcomes, this program should be eliminated along with the entire OHS. At the very least, the program’s COVID-19 vaccine and mask requirements should be rescinded.” [Department of Health and Human Services, Project 2025, accessed [6/24/24](#)]

## Allow States to Opt Out Of Federal Education Programs

**Project 2025 pushed for allowing states to opt out of federal K-12 education programs and allow states to put their share of funding toward any education purpose.** “Allowing States to Opt Out of

Federal Education Programs. States should be able to opt out of federal education programs such as the Academic Partnerships Lead Us to Success (APLUS) Act. Much of the red tape and regulations that hinder local school districts are handed down from Washington. This regulatory burden far exceeds the federal government’s less than 10 percent financing share of K–12 education. In the most recent fiscal year (FY 2022), states and localities financed 93 percent of K–12 education costs, and the federal government just 7 percent. That 7 percent share should not allow the federal government to dictate state and local education policy. | To restore state and local control of education and reduce the bureaucratic and compliance burden, Congress should allow states to opt out of the dozens of federal K–12 education programs authorized under the Elementary and Secondary Education Act, and instead allow states to put their share of federal funding toward any lawful education purpose under state law. This policy has been advanced over the years via a proposal known as the Academic Partnerships Lead Us to Success (APLUS) Act.” [Department of Education, Project 2025, accessed [6/24/24](#)]

### **Impact Aid**

**Project 2025 would “eliminated Impact Aid not tied to students” and move most students on those programs to another government agency.** “I Eliminate Impact Aid not tied to students. | Move student-driven Impact Aid programs to the Department of Defense Education Authority (DoDEA) or the Department of Interior’s Bureau of Indian Education.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Impact Aid provides funding to school districts to compensate for reductions in property tax revenue due to presence of federal property.** “OESE also currently manages the federal Impact Aid program, which provides funding to school districts to compensate for reductions in property tax revenue due to the presence of federal property (such as that associated with a military base or tribal lands).” [Department of Education, Project 2025, accessed [6/24/24](#)]

### **Indian Education**

**Project 2025: “Transfer all Indian education programs to the Bureau of Indian Education.”** [Department of Education, Project 2025, accessed [6/24/24](#)]

### **DC Opportunity Scholarship**

**Project 2025: The D.C. Opportunity Scholarship Program should be made universal and formula-funded through HHS.** “The D.C. Opportunity Scholarship Program, which provides vouchers to low-income children living in the nation’s capital—appropriate as D.C. is under the jurisdiction of Congress—should be expanded into a universal program, formula-funded, and moved to the Department of Health and Human Services.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on Congress to expand eligibility to all students.** “Congress should expand eligibility to all students, regardless of income or background, and raise the scholarship amount closer to the funding students receive in D.C. Public Schools (spending per student in 2020 was \$22,856). | All families should be able to take their children’s taxpayer-funded education dollars to the education providers of their choosing— whether it be a public school or a private school.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 wanted to remove the requirement of private schools to administer the DC Public Schools assessment and allow private schools to control their admissions process.** “Congress should additionally deregulate the program by removing the requirement of private schools to administer the D.C. Public Schools assessment and allowing private schools to control their admissions processes.” [Department of Education, Project 2025, accessed [6/24/24](#)]

### **Education Savings Accounts**

**Project 2025: “Every parent should have the option to direct his or her child’s share of education funding through an education savings account (ESA), funded overwhelmingly by state and local taxpayers.”** “Elementary and secondary education policy should follow the path outlined by Milton Friedman in 1955, wherein education is publicly funded but education decisions are made by families. Ultimately, every parent should have the option to direct his or her child’s share of education funding through an education savings account (ESA), funded overwhelmingly by state and local taxpayers, which would empower parents to choose a set of education options that meet their child’s unique needs.” [Department of Education, Project 2025, accessed [6/24/24](#)]

#### Office of Federal Student Aid and Student Loans

**Project 2025 argued that student loans and grants should “be restored to the private sector.”** “Although student loans and grants should ultimately be restored to the private sector (or, at the very least, the federal government should revisit its role as a guarantor, rather than direct lender) federal postsecondary education investments should bolster economic growth, and recipient institutions should nourish academic freedom and embrace intellectual diversity.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The new Administration must end the practice of acting like the federal student loan portfolio is a campaign fund to curry political support and votes. The new Administration must end abuses in the loan forgiveness programs.”** “Protecting the federal student loan portfolio from predatory politicians. The new Administration must end the practice of acting like the federal student loan portfolio is a campaign fund to curry political support and votes. The new Administration must end abuses in the loan forgiveness programs. Borrowers should be expected to repay their loans.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended that the next administration “completely reverse the student loan federalization of 2010” and “spin off FSA and its student loan obligations to a new government corporation.”** “The next Administration should completely reverse the student loan federalization of 2010 and work with Congress to spin off FSA and its student loan obligations to a new government corporation with professional governance and management.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 would rescind regulations that allowed loan forgiveness under borrower defense to repayment, closed school loan discharge, and public service loan forgiveness.** “Effective July 1, 2023, the department promulgated final regulations addressing loan forgiveness under the HEA’s provisions for borrower defense to repayment (‘BDR’), closed school loan discharge (‘CSLD’), and public service loan forgiveness (‘PSLF’). The regulations also included prohibitions against pre-dispute arbitration agreements and class action waivers for students enrolling in institutions participating in Title IV student loan programs. Acting outside of statutory authority, the current Administration has drastically expanded BDR, CSLD, and PSLF loan forgiveness without clear congressional authorization at a tremendous cost to the taxpayers, with estimates ranging from \$85.1 to \$120 billion. I The new Administration must quickly commence negotiated rulemaking and propose that the department rescind these regulations.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the phase out of every existing income-driven repayment plan, with a new plan having an income exemption equal to the poverty line and require payments of 10% of income above the exemption. They recommend passing legislation with no loan forgiveness.** “While income-driven repayment (IDR) of student loans is a superior approach relative to fixed payment plans, the number of IDR plans has proliferated beyond reason. And recent IDR plans are so generous that they require no or only token repayment from many students. I The Secretary should phase out all existing IDR plans by making new loans (including consolidation loans) ineligible and should implement a new IDR plan. The new plan should have an income exemption equal to the poverty line and require payments of 10 percent of income above the exemption. If new legislation is possible, there should be no

loan forgiveness, but if not, existing law would require forgiving any remaining balance after 25 years.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The new Administration must end the prior Administration’s abuse of the agency’s payment pause and HEA loan forgiveness programs.”** “The new Administration must end the prior Administration’s abuse of the agency’s payment pause and HEA loan forgiveness programs, including borrower defense to repayment, closed school discharge, and Public Service Loan Forgiveness.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the next administration to work with Congress to move to a system “in which private lenders, backed by government guarantees, would compete to offer student loans, including subsidized and unsubsidized, loans.”** “I The federal government does not have the proper incentives to make sound lending decisions, so the new Administration should consider returning to a system in which private lenders, backed by government guarantees, would compete to offer student loans, including subsidized and unsubsidized, loans. This would allow for market prices and signals to influence educational borrowing, introducing consumer-driven accountability into higher education. Pell grants should retain their current voucher-like structure.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: The next administration should utilize income-driven repayment, not include interest rate subsidies or loan forgiveness, and require “skin in the game” for colleges.** “If Congress is unwilling to reform federal student aid, then the next Administration should consider the following reforms: I Switch to fair-value accounting from FCRA accounting, and I Consolidate all federal loan programs into one new program that 1. Utilizes income-driven repayment, 2. Includes no interest rate subsidies or loan forgiveness, 3. Includes annual and aggregate limits on borrowing, and 4. Requires ‘skin in the game’ from colleges to help hold them accountable for loan repayment.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the next administration privatize all lending programs, including subsidized, unsubsidized, and PLUS loans.** “The federal government does not have the proper incentives to make sound lending decisions. The new Administration should consider: I Privatizing all lending programs, including subsidized, unsubsidized, and PLUS loans (both Grad and Parent). This would allow for market prices and signals to influence educational borrowing, introducing consumer-driven accountability into higher education. Pell grants should retain their current voucher-like structure.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: The Public Service Loan Forgiveness program “should be terminated.”** “The Public Service Loan Forgiveness program, which prioritizes government and public sector work over private sector employment, should be terminated.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: Eliminate time and occupation-based student loan forgiveness.** “I End time-based and occupation-based student loan forgiveness. A low estimate suggests ending current student loan forgiveness schemes would save taxpayers \$370 billion.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the repeal the power of the Secretary to cancel, compromise, discharge, or forgive student loans to modify the repayment amounts or terms of Title IV student loans.** “Whatever Congress chooses to do with future loans, there is still the question of the government’s responsible stewardship of the existing student loan portfolio—a substantial taxpayer asset. The current Administration has recklessly engaged in the policy fetish of forgiving and canceling student loans with abandon. I The next Administration should work with Congress to amend the HEA to ensure that no Administration engages in this kind of abuse in the future. I Specifically, the new Administration should urge the Congress to amend the HEA to abrogate, or substantially reduce, the power of the Secretary to cancel, compromise, discharge, or forgive the principal balances of Title IV student loans, as well as to modify in any material way the repayment amounts or terms of Title IV student loans.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the removal of DOE’s authority to forgive loans based on borrower defense to repayment.** “Further, the next Administration should propose that Congress amend the HEA to remove the department’s authority to forgive loans based on borrower defense to repayment; instead, the department should be authorized to discharge loans only in instances where clear and convincing evidence exists to demonstrate that an educational institution engaged in fraud toward a borrower in connection with his or her enrollment in the institution and the student’s educational program or activity at the institution.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for eliminating the PLUS loan program, which gives loans to graduate students and parents of undergraduate students.** “Eliminate the PLUS loan program. As mentioned above, the PLUS loan program, which provides graduate student loans and loans to the parents of undergraduate students, should be eliminated. This would generate an estimated \$2.3 billion in savings.” [Department of Education, Project 2025, accessed [6/24/24](#)]

#### **Office of Special Education and Rehabilitative Services**

**Project 2025 called for “most IDEA funding” to be converted into a no-strings formula block grant distributed to local education agencies by HHS’s Administration for Community Living.** “Most IDEA funding should be converted into a no-strings formula block grant targeted at students with disabilities and distributed directly to local education agencies by Health and Human Services’ Administration for Community Living.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Transfer the Vocational Rehabilitation Grants for Native American students to the Bureau of Indian Education.”** [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants to “phase out earmarks for a variety of special institutions.”** “Phase out earmarks for a variety of special institutions, as originally envisioned.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the regulation that says under Part B of IDEA that requires states to consider race and ethnicity in the disciplining of students with disabilities should be rescinded.** “Effective January 18, 2017, the department issued final regulations under Part B of IDEA that require states to consider race and ethnicity in the identification, placement, and discipline of students with disabilities. The new Administration should rescind this regulation.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 would rescind the Equity in IDEA regulation.** “The next Administration should immediately commence rulemaking to rescind the Equity in IDEA regulation. No replacement regulation is required.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended IDEA oversight be moved to HHS and IDEA should be revised to allow a child’s portion of spending be made available so parents can choose where a child learns.** “Federal lawmakers should move IDEA oversight and implementation to the U.S. Department of Health and Human Services. Officials should then consider revising IDEA to require that a child’s portion of the federal taxpayer spending under the law be made available to families so parents can choose how and where a child learns.” [Department of Education, Project 2025, accessed [6/24/24](#)]

#### **Office of Postsecondary Education**

**Project 2025: “The next Administration should work with Congress to eliminate or move OPE programs to ETA at the Department of Labor.”** [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the funding of institutions to be block-granted and narrowed to HBCUs and tribally controlled colleges.** “Funding to institutions should be block-granted and narrowed to Historically Black Colleges and Universities (HBCUs) and tribally controlled colleges.” [Department of Education, Project 2025, accessed [6/24/24](#)]

## Data Collection

**Project 2025 would moved the National Commission for Education Statistics to the Census Bureau.** “Move ED’s statistical office, the National Commission for Education Statistics (NCES), to the Department of Commerce’s Census Bureau. If Congress believes the federal government can play a valuable research role, those research centers can be moved to the National Science Foundation. If Congress decides to maintain IES as an independent agency, it needs to address major governance and management issues that keep it from being a productive contributor to the knowledge base related to teaching and learning.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**DOE should make student data available by family structure.** “The Department of Education (or whichever agency collects such data long term) should make student data available by family structure to the public, including as part of its Data Explorer tool. | As discussed above, data collection efforts should be consolidated under the Census Bureau.” [Department of Education, Project 2025, accessed [6/24/24](#)]

## Civil Rights

**Project 2025 called for DOE’s Office of Civil Rights to be moved to DOJ.** “I OCR should move to the Department of Justice. The federal government has an essential responsibility to enforce civil rights protections, but Washington should do so through the Department of Justice and federal courts. The OCR at DOJ should be able to enforce only through litigation.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the next administration to rescind Title IX changes implemented by the Biden administration, one of which added a new “nonbinary” sex category for the Civil Rights Data Collection office.** “I The new Administration must quickly move to rescind these changes, which add a new ‘nonbinary’ sex category to OCR’S data collection and issue a new CRDC that will collect data directly relevant to OCR’s statutory enforcement authority.” [Department of Education, Project 2025, accessed [6/24/24](#)]

## Charter Schools

**Project 2025 called on the next administration to rescind new requirements for charter schools to receive federal grants that were implemented by the Biden administration.** “Congress first authorized the Charter School Program (CSP) in 1994 [Title X, Part C of the Elementary and Secondary Education Act of 1965 (ESEA), as amended, 20 U.S.C. § 8061 et seq. (1994)]. It most recently reauthorized the program in 2015 as part of the Every Student Succeeds Act.<sup>13</sup> On March 14, 2022, the department published a notice concerning proposed priorities, requirements, definitions, and grant selection criteria relating to the award of federal grants to applicants in CSP. This proposal increases the federal footprint in the charter school sector by ignoring statute and adding to the list of requirements imposed on charter schools. | The new Administration must take immediate steps to rescind the new requirements and lessen the federal restrictions on charter schools.” [Department of Education, Project 2025, accessed [6/24/24](#)]

- **HEADLINE: “Biden administration proposes tougher rules for charter school grants.”**  
[Washington Post, [3/21/22](#)]

**Project 2025: “Congress could consider school choice legislation such as the Educational Choice for Children Act.”** “House Republicans included school choice in their ‘Commitment to America’ agenda. | Though actions by state lawmakers are essential and any federal policies should be strictly designed so



they do not conflict with state activities, Congress could consider school choice legislation such as the Educational Choice for Children Act. This bill would create a federal scholarship tax credit that would incentivize donors to contribute to nonprofit scholarship granting organizations (SGOs). Eligible families could then use that funding from the SGOs for their children’s education expenses including private school tuition, tutoring, and instructional materials.” [Department of Education, Project 2025, accessed [6/24/24](#)]

## Title IX and Athletics

**Project 2025 claimed the Biden administration “sought to trample women’s and girls’ athletic opportunities and due process on campus, threaten free speech and religious liberty, and erode parental rights in elementary and secondary education regarding sensitive issues of sex.”**

“Instead, the Biden Administration has sought to trample women’s and girls’ athletic opportunities and due process on campus, threaten free speech and religious liberty, and erode parental rights in elementary and secondary education regarding sensitive issues of sex.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 would rescind the Biden administration’s Title IX regulations and restore those made by Betsy DeVos in 2020, and define “sex” to mean biological sex at birth.** “Work with Congress to use the earliest available legislative vehicle to prohibit the department from using any appropriations or from otherwise enforcing any final regulations under Title IX promulgated by the department during the prior Administration. I Commence a new agency rulemaking process to rescind the current Administration’s Title IX regulations; restore the Title IX regulations promulgated by then-Secretary Betsy DeVos on May 19, 2020; and define ‘sex’ under Title IX to mean only biological sex recognized at birth.” [Department of Education, Project 2025, accessed [6/24/24](#)]

- **DeVos’ Title IX rule narrowed the definition of sexual harassment and directed schools to conduct live hearings with cross examination.** “The highly anticipated regulation is expected to unravel much of former Education Secretary Betsy DeVos’ Title IX rule, a defining aspect of her tenure. Her rule, which took effect in August 2020, narrowed the definition of sexual harassment and directed schools to conduct live hearings with cross-examination for sexual misconduct investigations.” [Politico, [2/3/24](#)]

**Project 2025 urged the next administration to amend Title IX to include due process requirements and “strengthen protections for faith-based educational institutions, programs, and activities.”**

“Work with Congress to amend Title IX to include due process requirements; define ‘sex’ under Title IX to mean only biological sex recognized at birth; and strengthen protections for faith-based educational institutions, programs, and activities.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the next administration to “restore the rights of women and girls and restore due process protections for accused individuals” after accusing the Biden administration of disposing of those rights.**

“The Trump Administration’s 2020 Title IX regulation protected the foundational right to due process for those who are accused of sexual misconduct. The Biden Administration’s proposed change to the interpretation of Title IX disposes of these rights. I The next Administration should move quickly to restore the rights of women and girls and restore due process protections for accused individuals.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 claimed there wasn’t a scientific or legal basis to redefine sex to “sexual orientation and gender identity.”**

“At the same time, there is no scientific or legal basis for redefining ‘sex’ to ‘sexual orientation and gender identity’ in Title IX. Such a change misrepresents the U.S. Supreme Court’s opinion in *Bostock*, threatens the American system of federalism, removes important due process protections for students in higher education, and puts girls and women in danger of physical harm.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the next administration to not change the redefinition of “sex” in Title IX across all departments.** “The next Administration should abandon this change redefining ‘sex’ to mean ‘sexual orientation and gender identity’ in Title IX immediately across all departments.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for every ongoing Title IX investigation to be dropped.** “At the same time, the political appointees in the Office for Civil Rights should begin a full review of all Title IX investigations that were conducted on the understanding that ‘sex’ referred to gender identity and/or sexual orientation. All ongoing investigations should be dropped, and all school districts affected should be given notice that they are free to drop any policy changes pursued under pressure from the Biden Administration.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 said the next administration shouldn’t allow the USDA or other federal agency from withholding services if they decide not to replace “sex” with “SOGI” in their administration of Title IX.** “The next Administration should prohibit the USDA or any other federal agency from withholding services from federal or state agencies—including but not limited to K–12 schools—that choose not to replace ‘sex’ with ‘SOGI’ in that agency’s administration of Title IX.” [Department of Education, Project 2025, accessed [6/24/24](#)]

## **Title VI – School Discipline and Disparate Impact**

**Project 2025 called on the next administration to continue the Trump administration policy and direct the department to review all Title VI cases to determine to what extent the cases include allegations of disparate impact.** “The next Administration should continue the policy of the Trump Administration in this area and direct the department to conduct a comprehensive review of all Title VI cases to ascertain to what extent these cases include allegations of disparate impact.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged DOE and DOJ to issue enforcement guidance saying they would not investigate Title VI cases that exclusively rested on allegations of disparate impact.** “As part of this effort, the new Administration should also direct the department and DOJ jointly to issue enforcement guidance stating that the agencies will no longer investigate Title VI cases that exclusively rest on allegations of disparate impact.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the next administration to issue a regulation that said Title VI of the Civil Rights Act does not include a disparate impact standard.** “Getting the federal government out of the business of dictating school discipline policy is a good start. But if the next conservative Department of Education simply rescinds the Biden-era regulation, it could very easily be enforced again on Day One through a Dear Colleague Letter by another leftist Administration. In addition to rescinding the policy and any related guidance, the next Secretary should work with the next Attorney General on a regulation that would clarify current regulations to state that Title VI of the Civil Rights Act does not include a disparate impact standard.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: “the next conservative Administration should take sweeping action to assure that the purpose of the Civil Rights Act is not inverted through a disparate impact standard to provide a pretext for theoretically endless federal meddling.”** “As law professor Gail Heriot has noted, the alleged existence of a disparate impact standard under Title VI makes everything presumed illegal unless given special dispensation by the federal government. Although it would require political capital from the White House, given that mainstream news outlets are sure to frame it as an attack on civil rights, the next conservative Administration should take sweeping action to assure that the purpose of the Civil Rights Act is not inverted through a disparate impact standard to provide a pretext for theoretically endless federal meddling.” [Department of Education, Project 2025, accessed [6/24/24](#)]

## **Higher Education Act**

**DOE should work with Congress to change the Higher Education Act to eliminate the negotiated rulemaking requirement.** “The Department of Education should work with Congress to amend the HEA to eliminate the negotiated rulemaking requirement. At a minimum, Congress should allow the department to use public hearings rather than negotiated rulemaking sessions.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 would amend the HEA to “prohibit accreditation agencies from leveraging their Title IV gatekeeper role to mandate that educational institutions adopt diversity, equity, and inclusion policies.”** “The current system is not working. A radical overhaul of the HEA’s accreditation requirements is thus in order. The next Administration should work with Congress to amend the HEA and should consider the following reforms: I Prohibit accreditation agencies from leveraging their Title IV gatekeeper role to mandate that educational institutions adopt diversity, equity, and inclusion policies.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 would not allow accreditation agencies to require standards that “undermine the religious beliefs of or require policies or conduct that conflict with” religious mission or beliefs of said institution.** “Protect faith-based institutions by prohibiting accreditation agencies from: 1. Requiring standards and criteria that undermine the religious beliefs of, or require policies or conduct that conflict with, the religious mission or religious beliefs of the institution; and 2. Intruding on the governance of colleges and universities controlled by a religious organization.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged “new accreditors” to start up and said the next Secretary should not recognize accreditors “that abuse their power.”** “For a college to participate in federal financial aid programs, it must be accredited, but accreditors have been abusing their quasi-regulatory power to impose non-educational requirements and ideological preferences on colleges. I The Secretary of Education should refuse to recognize all accreditors that abuse their power. I New accreditors should also be encouraged to start up.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The President should issue an executive order pursuing antitrust against college accreditors, especially the American Bar Association (ABA).”** [Department of Education, Project 2025, accessed [6/24/24](#)]

### National Education Association

**Project 2025: “Congress should rescind the National Education Association’s congressional charter and remove the false impression that federal taxpayers support the political activities of this special interest group.”** “Congress should rescind the National Education Association’s congressional charter and remove the false impression that federal taxpayers support the political activities of this special interest group. This move would not be unprecedented, as Congress has rescinded the federal charters of other organizations over the past century. The NEA is a demonstrably radical special interest group that overwhelmingly supports left-of-center policies and policymakers.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Members should conduct hearings to determine how much federal taxpayer money the NEA has used for radical causes favoring a single political party.”** [Department of Education, Project 2025, accessed [6/24/24](#)]

### Critical Race Theory

**Project 2025 urged the passage of legislation that would prevent critical race theory “from spreading discrimination.** “I As such, lawmakers should design legislation that prevents the theory from spreading discrimination. I For K–12 systems under their jurisdiction, federal lawmakers should adopt proposals that say no individual should receive punishment or benefits based on the color of their skin. I Furthermore, school officials should not require students or teachers to believe that individuals are guilty

or responsible for the actions of others based on race or ethnicity.” [Department of Education, Project 2025, accessed [6/24/24](#)]

## Parental Rights

**Project 2025 argued “Schools serve parents, not the other way around” and said anyone who disagreed “should be immediately cut off from federal funds.”** “In our schools, the question of parental authority over their children’s education is a simple one: Schools serve parents, not the other way around. That is, of course, the best argument for universal school choice—a goal all conservatives and conservative Presidents must pursue. But even before we achieve that long-term goal, parents’ rights as their children’s primary educators should be non-negotiable in American schools. States, cities and counties, school boards, union bosses, principals, and teachers who disagree should be immediately cut off from federal funds” [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the passage of a federal “Parents’ Bill of Rights bill that would make the issue a “top-tier” right.** “To remedy the lack of clear and robust protection for parental rights, the next Administration should: I Work to pass a federal Parents’ Bill of Rights that restores parental rights to a ‘top-tier’ right. Such legislation would give families a fair hearing in court when the federal government enforces any policy against parents in a way that undermines their right and responsibility to raise, educate, and care for their children. The law would require the government to satisfy ‘strict scrutiny’—the highest standard of judicial review—when the government infringes parental rights. I Further ensure that any regulations that could impact parental rights contain similar protections and require federal agencies to demonstrate that their action meets strict scrutiny before a final rule is promulgated.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 praised legislation put forward in Congress on parental rights.** “Prioritize legislation advancing such rights. Promising ideas have appeared in bills introduced in the 117<sup>th</sup> Congress such as H.R.8767, the Empowering Parents Act,15 sponsored by Representative Bob Good (R-VA); H.R. 6056, the Parents’ Bill of Rights Act,16 sponsored by Representative Julia Letlow (R-LA); and H.J. Res. 99,17 proposing an amendment to the Constitution relating to parental rights, sponsored by Representative Debbie Lesko (R-AZ). These congressional actions should be carefully reviewed to make sure they complement state Parents’ Bills of Rights, such as those passed in Georgia (2022), Florida (2021), Montana (2021), Wyoming (2017), Idaho (2015), Oklahoma (2014), Virginia (2013), and Arizona (2010).” [Department of Education, Project 2025, accessed [6/24/24](#)]

## Gender Identity

**Project 2025 claimed “radical gender ideology is having a devastating effect on school-aged children today—especially young girls.”** “The next Administration should take particular note of how radical gender ideology is having a devastating effect on school-aged children today—especially young girls.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the next administration to work with Congress to pass model legislation for the country that says “no public education employee or contractor shall use a name to address a student other than that listed on a student’s birth certificate without written permission.** “The next Administration should work with Congress to provide an example to state lawmakers by requiring K–12 districts under federal jurisdiction, including Washington, D.C., public schools, Bureau of Indian Education schools, and Department of Defense schools, with legislation stating that: I No public education employee or contractor shall use a name to address a student other than the name listed on a student’s birth certificate, without the written permission of a student’s parents or guardians.” [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the next administration to work with Congress to pass model legislation for the country that says “no public education employee or contractor shall use a pronoun” addressing a student if different from student’s biological sex without written permission.** “No

public education employee or contractor shall use a pronoun in addressing a student that is different from that student's biological sex without the written permission of a student's parents or guardians." [Department of Education, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the next administration to work with Congress to pass model legislation for the country that says a public institution could not require an education employee or contractor to use a pronoun if it does not match that person's biological sex if it is contrary to that employee's religious or moral convictions.** "No public institution may require an education employee or contractor to use a pronoun that does not match a person's biological sex if contrary to the employee's or contractor's religious or moral convictions." [Department of Education, Project 2025, accessed [6/24/24](#)]

### Federal Workforce Requirements

**Project 2025: The next president "should issue an executive order stating that a college degree shall not be required for any federal job unless the requirements of the job specifically demand it."** "Minimize bachelor's degree requirements. The President should issue an executive order stating that a college degree shall not be required for any federal job unless the requirements of the job specifically demand it." [Department of Education, Project 2025, accessed [6/24/24](#)]

### College Preparedness

**Project 2025 would eliminate the GEAR-UP program.** "Eliminate GEAR-UP. It is not the responsibility of the federal government to provide taxpayer dollars to create a pipeline from high school to college. GEAR UP should be eliminated, and its functions should instead be handled privately or at the state and local levels, where policymakers are better equipped to increase college preparedness within their school districts." [Department of Education, Project 2025, accessed [6/24/24](#)]

- **GEAR UP provides grants to states and partnerships to provide services in high-poverty middle and high schools, and to provide college scholarships to low-income students.** "This discretionary grant program is designed to increase the number of low-income students who are prepared to enter and succeed in postsecondary education. GEAR UP provides six-year or seven years grants to states and partnerships to provide services at high-poverty middle and high schools. GEAR UP grantees serve an entire cohort of students beginning no later than the seventh grade and follow the cohort through high school. GEAR UP funds are also used to provide college scholarships to low-income students." [U.S. Department of Education, accessed [3/7/24](#)]

## Agriculture and Nutrition

### Top Lines

- ✓ Would implement work requirements for food stamps
- ✓ Would increase the cost of crop insurance for farmers
- ✓ Would eliminate some federal meat inspections, endangering the health of consumers
- ✓ Would gut federal dietary guidelines
- ✓ Would eliminate the requirement that GMOs be labeled
- ✓ Would implement work requirements for food stamps
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**Project 2025 recommended “installing work requirements for food stamps” to reverse the “family crisis” in the U.S.** “Furthermore, the next conservative President must understand that using government alone to respond to symptoms of the family crisis is a dead end. Federal power must instead be wielded to reverse the crisis and rescue America’s kids from familial breakdown. The Conservative Promise includes dozens of specific policies to accomplish this existential task. Some are obvious and long-standing goals like eliminating marriage penalties in federal welfare programs and the tax code and installing work requirements for food stamps.” [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposes to increase the cost of crop insurance on farmers and reduce aid for farmers to cover the cost of their insurance premiums.** “Reduce the premium subsidy rate for crop insurance. On average, taxpayers cover about 60 percent of the premium cost for policies purchased in the federal crop insurance program. One of the most widely supported and bipartisan policy reforms is to reduce the premium subsidy that taxpayers are forced to pay.” [USDA, Project 2025 accessed [6/24/24](#)]

**Project 2025 proposes eliminate some federal meat inspections allowing for state inspected meat to be sold across state lines without federal approval.** “The next Administration should ‘promote legislation that would allow state-inspected meat to be sold in interstate commerce. These barriers to the sale of meat and poultry from USDA-approved state-inspected facilities should be removed.” [USDA, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposes the Federal Dietary Guidelines.** “Nutrition and dietary choices are best left to individuals to address their personal needs.... The next Administration should: Work with lawmakers to repeal the Dietary Guidelines.” [USDA, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposes to eliminate the requirement that Genetically Modified Foods be labeled.** “Repeal the federal labeling mandate. The USDA should work with Congress to repeal the federal labeling law, while maintaining federal preemption, and stress that voluntary labeling is allowed.” [USDA, Project 2025, accessed [6/24/24](#)]

## Homeland Security

### Top Lines

#### DHS

- ✓ Would “dismantle the Department of Homeland Security.”
- ✓ Would privatize the TSA
- ✓ Privatize FEMA’s National Flood Insurance Program, leaving majority of responsibility to states and localities.
- ✓ Eliminate most DHS grant programs
- ✓ Remove all DHS unions
- ✓ Eliminate DHS Office of Intelligence and Analysis.
- ✓ Argued for the circumvention of Senate-confirmed appointments by placings nominees for key positions in an “Acting” capacity.
- ✓ Replacing the entirety of the Homeland Security Advisory Committee

#### Immigration

- ✓ Restart and expand horseback-mounted border patrol.
- ✓ Recommended not increasing H-2B visas above a set cap.
- ✓ Eliminate T and U visas because “victimization should not be a basis for an immigration benefit.”
- ✓ ICE should have a “significant increase in detention space.”
- ✓ Repeal of diversity visa lottery and chain migration.
- ✓ Called for repeal of Temporary Protected Status designations.
- ✓ Being a victim or being in fear of gang violence and domestic violence should not be grounds for asylum and the standard for a credible fear of prosecution should be raised.

- ✓ Congress should authorize state and local law enforcement to participate in immigration and border enforcement.
- ✓ Congress should restrict authority for prosecutorial discretion for immigration enforcement.
- ✓ Eliminate the Office of the Immigration Detention Ombudsman.
- ✓ The Office of the Citizenship and Immigration Services Ombudsman should be eliminated.
- ✓ Would work with Education Department to deny loan access to students at schools that provide in-state tuition to undocumented immigrants.

#### **FEMA**

- ✓ Raise the threshold at which states and localities are eligible for FEMA assistance.
- ✓ Recommend federal government cover 25% of costs for small disasters, with a ceiling of 75% for those that are “truly catastrophic.”
- ✓ NFIP should be wound down and replaced with private insurance.

#### **Secret Service**

- ✓ Would have USSS keep visitor logs for anywhere president works or resides.
- ✓ Recommend all agents outside Washington, DC be transferred to ICE field offices.

#### **TSA**

- ✓ Force TSA's workforce to deunionize until it is privatized.

### **Eliminate DHS**

**Project 2025 recommended that the next president “pursue legislation to dismantle the Department of Homeland Security.”** “Our primary recommendation is that the President pursue legislation to dismantle the Department of Homeland Security (DHS). After 20 years, it has not gelled into ‘One DHS.’ Instead, its various components’ different missions have outweighed its decades-long attempt to function as one department, rendering the whole disjointed rather than cohesive. Breaking up the department along its mission lines would facilitate mission focus and provide opportunities to reduce overhead and achieve more limited government.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended CBP, ICE, USCIS, ORR, and the EOIR merge into a standalone border and immigration Cabinet-level agency.** “I U.S. Customs and Border Protection (CBP) be combined with Immigration and Customs Enforcement (ICE); U.S. Citizenship and Immigration Services (USCIS); the Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR); and the Department of Justice (DOJ) Executive Office for Immigration Review (EOIR) and Office of Immigration Litigation (OIL) into a standalone border and immigration agency at the Cabinet level (more than 100,000 employees, making it the third largest department measured by manpower).” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended CISA be moved to DOT.** “The Cybersecurity and Infrastructure Security Agency (CISA) be moved to the Department of Transportation.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended moving FEMA to either DOI or DOT if combined with CISA.** “The Federal Emergency Management Agency (FEMA) be moved to the Department of the Interior or, if combined with CISA, to the Department of Transportation.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for U.S. Coast Guard to be moved to DOJ or to DOD.** “The U.S. Coast Guard (USCG) be moved to DOJ and, in time of full-scale war (i.e., threatening the homeland), to the Department of Defense (DOD). Alternatively, USCG should be moved to DOD for all purposes.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 would split Secret Service into two, with protective element moved to DOJ while financial enforcement moved to Treasury.** “The U.S. Secret Service (USSS) be divided in two, with the protective element moved to DOJ and the financial enforcement element moved to the Department of the Treasury.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the privatization of the TSA.** “The Transportation Security Administration (TSA) be privatized.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the Science and Technology Directorate be moved to DOD and the Office of Countering Weapons of Mass Destruction to the FBI.** “The Science and Technology Directorate (S&T) be moved to DOD and the Office of Countering Weapons of Mass Destruction be moved to the FBI.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the other components not mentioned at DHS could be dismantled.** “All of the remaining supporting components could be dismantled because their functions already exist in the moving components as well as the receiving departments. Cutting these costs would save the American taxpayers significant sums.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended privatizing TSA screening and FEMA’s National Flood Insurance Program, shifting the majority of preparedness and response costs to states and localities.** “The bloated DHS bureaucracy and budget, along with the wrong priorities, provide real opportunities for a conservative Administration to cut billions in spending and limit government’s role in Americans’ lives. These opportunities include privatizing TSA screening and the Federal Emergency Management Agency (FEMA) National Flood Insurance Program, reforming FEMA emergency spending to shift the majority of preparedness and response costs to states and localities instead of the federal government, eliminating most of DHS’s grant programs, and removing all unions in the department for national security purposes.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended “eliminating most of DHS’s grant programs, and removing all unions in the department for national security purposes.”** “The bloated DHS bureaucracy and budget, along with the wrong priorities, provide real opportunities for a conservative Administration to cut billions in spending and limit government’s role in Americans’ lives. These opportunities include privatizing TSA screening and the Federal Emergency Management Agency (FEMA) National Flood Insurance Program, reforming FEMA emergency spending to shift the majority of preparedness and response costs to states and localities instead of the federal government, eliminating most of DHS’s grant programs, and removing all unions in the department for national security purposes.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended consolidating ICE and CBP to create a Border Security and Immigration Agency if all immigration agencies aren’t merged.** “If all immigration agencies are not merged, including USCIS and ORR, then an appropriate third alternative would be to consolidate ICE and CBP to form a combined Border Security and Immigration Agency (BSIA). This would integrate critical interdiction, enforcement, and investigative resources, enhancing coordination and refocusing collective efforts on the vast and complex cross-border threats impacting our nation’s health, safety, and national security.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the elimination of DHS’s Office of Intelligence and Analysis.** “The Office of Intelligence and Analysis should be eliminated both because it has not added value and because it has been weaponized for domestic political purposes. The Intelligence Community (IC) already provides raw intelligence to DHS components. In addition, the FBI, National Counter Terrorism Center, and other agencies where necessary already provide holistic threat assessment products to federal, state, local, tribal, and territorial governments as well as to private-sector entities at both the classified and unclassified levels where appropriate.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]



## Personnel

**Project 2025 said DHS's functions would improve if the next Secretary had their own dedicated team of political appointees selected and vetted by OPP.** "Expansion of Dedicated Political Personnel. The Secretary of Homeland Security is a presidentially appointed and Senate-confirmed political appointee, but for budgetary reasons, he or she has historically been unable to fund a dedicated team of political appointees. A key first step for the Secretary to improve front-office functions is to have his or her own dedicated team of political appointees selected and vetted by the Office of Presidential Personnel, which is not reliant on detailees from other parts of the department, to help ensure the completion of the next President's agenda." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the next administration to circumvent Senate confirmation positions by placing its nominees in key positions into similar positions as "Actings."** "An Aggressive Approach to Senate-Confirmed Leadership Positions. While Senate confirmation is a constitutionally necessary requirement for appointing agency leadership, the next Administration may need to take a novel approach to the confirmations process to ensure an adequate and rapid transition. For example, the next Administration arguably should place its nominees for key positions into similar positions as 'actings' (for example, putting in a person to serve as the Senior Official Performing the Duties of the Commissioner of CBP while that person is going through the confirmation process to direct ICE or become the Secretary). This approach would both guarantee implementation of the Day One agenda and equip the department for potential emergency situations while still honoring the confirmation requirement." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 looked to remove lower-level positions from Senate confirmation, which would require legislation.** "The department should also look to remove lower-level but nevertheless important positions that currently require Senate confirmation from the confirmation requirement, although this effort would require legislation (and might also be mooted in the event of legislation that closes portions of the department that currently have Senate-confirmed leadership)." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended restructuring and redistributing career personnel in the department.** "Restructuring and Redistribution of Career Personnel. To strengthen political decision-making and ensure that taxpayer dollars are being used legally and efficiently, the Secretary should make major changes in the distribution of career personnel throughout the department. For example, personnel from parts of the department undergoing soft closure could be redistributed to what will be workload-intensive corners of the department, including national security-critical and transparency functions. All personnel with law enforcement capacity should be removed immediately from office billets and deployed to field billets to maximize law enforcement capacity." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended replacing the entire Homeland Security Advisory Committee.** "Replacement of the Entire Homeland Security Advisory Committee. The Secretary should plan to quickly remove all current members of the Homeland Security Advisory Committee and replace them as quickly as is feasible." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the restart and expansion of horseback-mounted Border Patrol.** "CBP should restart and expand use of the horseback-mounted Border Patrol. As part of this announcement, the Secretary should clear the records and personnel files of those who were falsely accused by Secretary Alejandro Mayorkas of whipping migrants and issue a formal apology on behalf of DHS and CBP." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

## Immigration

**Project 2025 recommended not increasing the number of H-2B visas above a statutorily set cap and they should not have regulations supporting the H-2 eligible country list.** "The Secretary should

make it clear that he or she will not use the Secretary's existing discretionary authority to increase the number of H-2B (seasonal non-agricultural) visas above the statutorily set cap. | The Secretary should not issue any regulations in support of the 'H-2 eligible' country list, the effect of which would prevent favoring certain foreign nationals seeking an H-2 guest worker visa based simply on their nationality." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 would “order ICE to stop closing out pending immigration cases” which they claim led to “lawlessness that allowed thousands of illegal aliens and other immigration violators to go free in the United States.”** “Order ICE to stop closing out pending immigration cases and apply the Immigration and Nationality Act (INA) as written by Congress.<sup>3</sup> The Biden Administration closed out tens of thousands of immigration cases that had already been prepared and were slated for expedited removal processing or hearings before the U.S. Immigration Court. This misguided action constituted an egregious example of lawlessness that allowed thousands of illegal aliens and other immigration violators to go free in the United States.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 would “direct ICE to stop ignoring criminal aliens identified through the 287(g) program.”** “Direct ICE to stop ignoring criminal aliens identified through the 287(g) program.<sup>4</sup> Ultimately, Congress should prevent ICE from ignoring criminal aliens identified by local law enforcement agencies that are partners in the 287(g) program. However, before congressional action, ICE should be directed to take custody of all aliens with records for felonies, crimes of violence, DUIs, previous removals, and any other crime that is considered a national security or public safety threat as defined under current laws.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the elimination of T and U visas because “victimization should not be a basis for an immigration benefit.”** “Eliminate T and U visas. Victimization should not be a basis for an immigration benefit. If an alien who was a trafficking or crime victim is actively and significantly cooperating with law enforcement as a witness, the S visa is already available and should be used. Pending elimination of the T and U visas, the Secretary should significantly restrict eligibility for each visa to prevent fraud.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Unless and until T and U visas are repealed, each program needs to be reformed to ensure that only legitimate victims of trafficking and crimes who are actively providing significant material assistance to law enforcement are eligible” for visas.** “T-Visa and U-Visa reform. Unless and until T and U visas are repealed, each program needs to be reformed to ensure that only legitimate victims of trafficking and crimes who are actively providing significant material assistance to law enforcement are eligible for spots in the queue.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the removal of “security risks” from the Student and Exchange Visitor Program by eliminating or significantly reducing the number of visas issued to foreign students “from enemy nations.”** “Prioritize national security in the Student and Exchange Visitor Program (SEVP). ICE should end its current cozy deference to educational institutions and remove security risks from the program. This requires working with the Department of State to eliminate or significantly reduce the number of visas issued to foreign students from enemy nations.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**The role of ICE Deportation Officers should be defined as being primarily responsible for enforcing civil immigration regulations, including the arrest, detention and removal of violators anywhere in the U.S., “without warrant where appropriate.”** “The role of ICE Deportation Officers should be clarified. ICE Enforcement and Removal Operations (ERO) should be identified as being primarily responsible for enforcing civil immigration regulations, including the civil arrest, detention, and removal of immigration violators anywhere in the United States, without warrant where appropriate, subject only to the civil warrant requirements of the INA where appropriate.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the rescission of “sensitive zones” where ICE personnel were prohibited from operating.** “All ICE memoranda identifying ‘sensitive zones’ where ICE personnel are prohibited from operating should be rescinded. Rely on the good judgment of officers in the field to avoid inappropriate situations.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The use of Blackies Warrants should be operationalized within ICE.”** “The use of Blackies Warrants should be operationalized within ICE. These civil search warrants are commonly used for worksite enforcement when agents have probable cause that illegal aliens are employed at a business. This would streamline investigations.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025: “ICE should be funded for a significant increase in detention space, raising the daily available number of beds to 100,000.”** “Congress should mandate and fund additional bed space for alien detainees. ICE should be funded for a significant increase in detention space, raising the daily available number of beds to 100,000.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for in immigration agenda that “focused on creating a merit-based immigration system that rewards high-skilled aliens.”** “The incoming Administration should spearhead an immigration legislative agenda focused on creating a merit-based immigration system that rewards high-skilled aliens instead of the current system that favors extended family-based and luck-of-the-draw immigration.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the repeal of the diversity visa lottery and chain migration.** “To that end, the diversity visa lottery should be repealed, chain migration should be ended while focusing on the nuclear family, and the existing employment visa program should be replaced with a system to award visas only to the ‘best and brightest.’” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the replacement of a system to award visas only the “best and brightest.”** “To that end, the diversity visa lottery should be repealed, chain migration should be ended while focusing on the nuclear family, and the existing employment visa program should be replaced with a system to award visas only to the ‘best and brightest.’” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the transformation of the H-1B program to one in which “employers are vying to bring in only the top foreign workers at the highest wages so as not to depress American opportunities.”** “Internal efforts to limit employment authorization should be matched by congressional action to narrow statutory eligibility to work in the United States and mitigate unfair employment competition for U.S. citizens. The oft-abused H-1B program should be transformed into an elite program through which employers are vying to bring in only the top foreign workers at the highest wages so as not to depress American opportunities.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended turning the H-1B program into a program “to bring in the best and brightest at the highest wages while simultaneously ensuring U.S. workers are not being disadvantaged by the program.”** “Transform the program into an elite mechanism exclusively to bring in the ‘best and brightest’ at the highest wages while simultaneously ensuring that U.S. workers are not being disadvantaged by the program. H-1B is a means only to supplement the U.S. economy and to keep companies competitive, not to depress U.S. labor markets artificially in certain industries.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the repeal of Temporary Protected Status designation and make E-Verify mandatory.** “Additionally, Congress should: Improve the integrity of the temporary work visa programs; Repeal Temporary Protected Status (TPS) designations; Permanently authorize and make mandatory E-Verify; and End parole abuse by legislating specific parole standards.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**All applicants rejected for any benefit or status adjudication should be required to leave the U.S. immediately until USCIS is caught up on all case backlogs.** “At least until USCIS is caught up on all case backlogs, all applicants rejected for any benefit or status adjudication should be required to leave the U.S. immediately. Ordinary process can resume once all case backlogs have been adjudicated.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the creation of a authority similar to the Title 42 Public Health authority “to expel illegal aliens across the border immediately when certain non-health conditions are met.”** “Create an authority akin to the Title 42 Public Health authority that has been used during the COVID-19 pandemic to expel illegal aliens across the border immediately when certain non-health conditions are met, such as loss of operational control of the border.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended repealing Section 235 of the William Wilberforce Trafficking Victims Protection Act which provides immigration benefits to unaccompanied minors.** “Congress should repeal Section 235 of the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA),<sup>9</sup> which provides numerous immigration benefits to unaccompanied alien children and only encourages more parents to send their children across the border illegally and unaccompanied. These children too often become trafficking victims, which means that the TVPRA has failed.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended ending the Flores Settlement Agreement and setting nationwide standards for family and unaccompanied detention and housing.** “Congress must end the Flores Settlement Agreement by explicitly setting nationwide terms and standards for family and unaccompanied detention and housing. Such standards should focus on meeting human needs and should allow for large-scale use of temporary facilities (for example, tents).” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for “the standard for a credible fear of persecution” to be raised for migrants to seek asylum.** “The standard for a credible fear of persecution should be raised and aligned to the standard for asylum. It should also account specifically for credibility determinations that are a key element of the asylum claim.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 suggested that gang violence and domestic violence should not alone be grounds for asylum.** “Congress should eliminate the particular social group protected ground as vague and overbroad or, in the alternative, provide a clear definition with parameters that at a minimum codify the holding in Matter of A-B-that gang violence and domestic violence are not grounds for asylum.<sup>10</sup>” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended that Congress stop funding NGOs that “process and transport illegal aliens into and throughout the United States.”** “Congress should halt funds given to nongovernmental organizations (NGOs) to process and transport illegal aliens into and throughout the United States. Such funds and infrastructure, including the DHS joint processing centers, should be redirected to secure the border, detain aliens, and provide space for immigration court proceedings.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Congress should unequivocally authorize state and local law enforcement to participate in immigration and border security actions in compliance with Arizona v. United States.”** [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for Congress to restrict the authority for prosecutorial discretion on immigration enforcement.** “Congress should restrict the authority for prosecutorial discretion to eliminate it as a ‘catch-all’ excuse for limiting immigration enforcement.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for mandatory detention for undocumented immigrants.** “Congress should eliminate ambiguous discretionary language in Title 8 that aliens ‘may’ be detained and clarify that aliens ‘shall’ be detained. This language, which contrasts with other ‘shall detain’ language in statute, creates unhelpful ambiguity and allows the executive branch to ignore the will of Congress.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended using executive action to immediately reinstate Asylum Cooperative Agreements with Northern Triangle Countries.** “Direct the Department of State and the Department of Homeland Security to reinstate Asylum Cooperative Agreements with Northern Triangle Countries immediately.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Recommence negotiations with Mexico to fully implement the Remain in Mexico Protocols.”** [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The Office of the Immigration Detention Ombudsman should be eliminated.”** “The Office of the Immigration Detention Ombudsman should be eliminated. This requires a statutory change in Section 106 of the Consolidated Appropriations Act of 2020.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The Office of the Citizenship and Immigration Services Ombudsman should be eliminated.”** “CISOMB. The Office of the Citizenship and Immigration Services Ombudsman should be eliminated. The DHS bureaucracy is too large, and the Secretary has too many direct reports. CISOMB’s policy functions can be performed (and sometimes already are) by OIG and GAO. The specialized case work can be moved into USCIS as a special unit, much like the IRS Taxpayer Advocate. This would require a statutory change to Section 452 of the Homeland Security Act of 2002.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended working with the Education Department to deny loan access to students at schools that provide in-state tuition to undocumented immigrants.** “Department of Education: Deny loan access to those who are not U.S. citizens or lawful permanent residents, and deny loan access to students at schools that provide in-state tuition to illegal aliens.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

## FEMA

**Project 2025 recommended raising the threshold at which states and localities are eligible for public assistance via FEMA.** “Under the Stafford Act, FEMA has the authority to adjust the per capita indicator for damages, which creates a threshold under which states and localities are not eligible for public assistance. FEMA should raise the threshold because the per capita indicator has not kept pace with inflation, and this over time has effectively lowered the threshold for public assistance and caused FEMA’s resources to be stretched perilously thin.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the federal government cover 25% of the costs for small disasters and a ceiling of 75% of the cost “for truly catastrophic disasters.”** “In addition, Congress should change the cost-share arrangement so that the federal government covers 25 percent of the costs for small disasters with the cost share reaching a maximum of 75 percent for truly catastrophic disasters.” [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The NFIP should be wound down and replaced with private insurance starting with the least risky areas currently identified by the program.”** [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended that FEMA only have one Senate-confirmed position instead of four.** “FEMA currently has four Senate-confirmed positions. Only the Administrator should be confirmed by the

Senate; other political leadership need not be confirmed by the Senate. Additionally, FEMA's 'springing Cabinet position' should be eliminated, as this creates significant unnecessary challenges to the functioning of the whole of DHS at points in time when coordinated responses are most needed." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

### U.S. Coast Guard

**Project 2025 suggested re-vetting "any promotions and hiring that occurred on the Biden Administration's watch while also re-onboarding any USCG personnel who were dismissed from service for refusing to take the COVID-19 'vaccine.'" "USCG is facing recruitment challenges similar to those faced by the military services.** The Administration should stop the messaging on wokeness and diversity and focus instead on attracting the best talent for USCG. Simultaneously, consistent with the Department of Defense, USCG should also make a serious effort to re-vet any promotions and hiring that occurred on the Biden Administration's watch while also re-onboarding any USCG personnel who were dismissed from service for refusing to take the COVID-19 'vaccine,' with time in service credited — 157 — 2025 Presidential Transition Project to such returnees. These two steps could be foundational for any improvements in the recruiting process." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

### Secret Service

**Project 2025 called on USSS to keep visitor logs for anywhere the president works or resides.** "USSS should keep visitor logs for all facilities where the President works or resides. The Biden Administration has evaded such transparency with President Biden spending a historic amount of time for a President at his Delaware residence. This has left the American people in the dark as to who is influencing the highest levels of their own government." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended that all USSS agents stationed outside of Washington, DC be transferred to work in ICE field offices.** "USSS should transfer to the Department of Justice and Department of the Treasury all investigations that are not related to its protective function. It should begin the logistical operation of closing all field offices throughout the country and internationally to the extent they are not taken over by Treasury or Justice. USSS agents stationed outside of Washington, D.C., should be transferred to work in Immigration and Customs Enforcement field offices where they would continue to be the 'boots on the ground' to follow up on threat reports throughout the country and liaise with local law enforcement for visits by protectees." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

### TSA

**Project 2025 recommended making TSA's workforce deunionize immediately until it is privatized.** "The TSA model is costly and unwisely makes TSA both the regulator and the regulated organization responsible for screening operations. As part of an effort to shrink federal bureaucracies and bring private-sector know-how to government programs, TSA is ripe for reform. The U.S. should look to the Canadian and European private models of providing aviation screening manpower to lower TSA costs while maintaining security. Until it is privatized, TSA should be treated as a national security provider, and its workforce should be deunionized immediately." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

### Civil Rights and Civil Liberties

**Project 2025 recommended the DHS Civil Rights and Civil Liberties Officer be focused on EEO compliance and civil liberties.** "The CRCL Officer should focus on equal employment opportunity (EEO) compliance and the civil liberties function and investigate matters only within Headquarters or support

components. Operational components' civil liberties officers should investigate incidents regarding their own agencies. The CRCL Officer should ensure that all civil liberties or civil rights complaints are sent to the Office of Inspector General (OIG) for review. If the OIG chooses not to investigate, the CRCL Officer should only provide supportive information on possible courses of action for complainants." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

## January 6<sup>th</sup>

**Project 2025 highlighted an incident in which a pipe bomb was found outside the DNC while Kamala Harris was in the building on January 6<sup>th</sup>, calling it a "security failure."** "The U.S. Secret Service must be the world's best protective agency. Currently, the agency is distracted by its dual mission of protection and financial investigations. The result has been a long series of high-profile embarrassments and security failures, perhaps most notably its allowing of then-Vice President-elect Kamala Harris to be inside the Democratic National Committee office on January 6, 2021, while a pipe bomb was outside. Despite the great size and scope of the January 6 investigation, this high-profile incident of danger to a protectee remains unresolved." [Department of Homeland Security, Project 2025, accessed [6/24/24](#)]

## Military and Defense

### Top Lines

#### Military Recruitment and Personnel

- ✓ HIV-positive service members should be removed.
- ✓ Service members "with gender dysphoria should be expelled from military service."
- ✓ Reverse policies allowing transgender individuals from serving in the military.
- ✓ Abolish teaching of Critical Race Theory and DEI offices and staff.
- ✓ Eliminate tenure for academic professionals at military academies.
- ✓ Eliminate every USMC law enforcement battalion.

#### Anti-Abortion

- ✓ Ban using public funds to facilitate abortion for servicemembers.

#### China

- ✓ Want to make defeating the Chinese Communist Party the highest foreign policy/defense priority.
- ✓ Economic engagement with China should be ended.
- ✓ TikTok should be outlawed.
- ✓ Any university that takes money from China should lose their accreditation and eligibility to receive federal funding.

#### Nuclear Capacity

- ✓ Recommends expanding and modernizing the U.S. nuclear arsenal.
- ✓ Accelerate efforts to restore plutonium pit production and investments in the National Laboratories facilities to support nuclear weapon development.

#### Alliances

- ✓ Transform NATO so American allies are capable of fielding the majority of conventional forces while the U.S. would serve as primarily a nuclear deterrent.
- ✓ Want to increase U.S. foreign military sales.

### Military Recruitment and Personnel

**Project 2025: Service members who are HIV-positive should be removed and “those with gender dysphoria should be expelled from military service.”** “I Restore standards of lethality and excellence. Entrance criteria for military service and specific occupational career fields should be based on the needs of those positions. Exceptions for individuals who are already predisposed to require medical treatment (for example, HIV positive or suffering from gender dysphoria) should be removed, and those with gender dysphoria should be expelled from military service. Physical fitness requirements should be based on the occupational field without consideration of gender, race, ethnicity, or orientation” [Department of Defense, Project 2025, accessed [6/24/24](#)].

**Improve recruiting by suspending the use of the MHS Genesis system that uses private medical records.** “Improve recruiting by suspending the use of the recently introduced MHS Genesis system that uses private medical records of potential recruits at Military Entrance Processing Stations (MEPS), creating unnecessary delays and unwarranted rejections.11.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 sought to ensure senior military officials “understand their primary duty to be ensuring the readiness of the armed forces, not pursuing a social engineering agenda.”** “Codify language to instruct senior military officers (three and four stars) to make certain that they understand their primary duty to be ensuring the readiness of the armed forces, not pursuing a social engineering agenda. This direction should be reinforced during the Senate confirmation process. Orders and direction motivated by purely partisan motives should be identified as threats to readiness.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended reinstating service members to active duty who were discharged for not receiving a COVID-19 vaccine.** “Reinstate servicemembers to active duty who were discharged for not receiving the COVID vaccine, restore their appropriate rank, and provide back pay.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Eliminate Marxist indoctrination and divisive critical race theory programs and abolish newly established diversity, equity, and inclusion offices and staff.”** [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended auditing course offerings at military academies “to remove Marxist indoctrination”, eliminate tenure for academic professionals.** “Audit the course offerings at military academies to remove Marxist indoctrination, eliminate tenure for academic professionals, and apply the same rules to instructors that are applied to other DOD contracting personnel.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 would “reverse policies that allow transgender individuals to serve in the military” and ban using public funds for transgender surgeries.** “Reverse policies that allow transgender individuals to serve in the military. Gender dysphoria is incompatible with the demands of military service, and the use of public monies for transgender surgeries or to facilitate abortion for servicemembers should be ended.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

## Abortion

**Project 2025 would ban using public funds to facilitate abortion for servicemembers.** “Reverse policies that allow transgender individuals to serve in the military. Gender dysphoria is incompatible with the demands of military service, and the use of public monies for transgender surgeries or to facilitate abortion for servicemembers should be ended.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

## Spending

**Project 2025 called for an increase in the Army’s budget.** “Increase the Army budget to remain the world’s preeminent land power.” [Department of Defense, Project 2025, accessed [6/24/24](#)]



**Project 2025 recommended increasing the Air Force budget by 5% annually after adjusting for inflation.** “3. Increase the Air Force budget by 5 percent annually (after adjusting for inflation) to reverse the decline in size, age, and readiness and facilitate the transition to a more modern, lethal, and survivable force” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the U.S. Navy to build a fleet of over 355 ships.** “Investments must be closely coordinated with these other elements of military power. 1. Build a fleet of more than 355 ships.<sup>26</sup> 2. Develop and field unmanned systems to augment the manned forces. 3. Require that range and lethality be the key factors in all procurement and sustainment decisions for ships, aircraft, and munitions.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended changing the USMC structure, including by eliminating every USMC law enforcement battalion.** “1. Transform USMC force structure. a. Eliminate all USMC law enforcement battalions. b. Transform at least one Marine Infantry Regiment into a Marine Littoral Regiment. c. Reduce the size of remaining infantry battalions.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

## General Strategy

**Project 2025 recommended making “irregular warfare a cornerstone of security strategy.”** “Make irregular warfare a cornerstone of security strategy. The U.S. can project strength through unified action with our Interagency,<sup>38</sup> allies, and partners by utilizing irregular warfare capabilities synchronized with elements of national power. Broadly redefining irregular warfare to address current state and nonstate actors is critical to countering irregular threats that range from the Chinese use of economic warfare to Russian disinformation and Islamist terrorism. A broad definition of irregular warfare in the National Security Strategy would allow for a whole-of-government approach, thereby providing resources and capabilities to counter threats and ultimately serve as credible deterrence at the strategic and tactical levels.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Demonstrate a willingness to employ offensive cyber capabilities against adversaries who conduct cyberattacks against U.S. infrastructure, businesses, personnel, and governments.”** [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 rejected the argument that missile defense systems are destabilizing and called to keep homeland missile defense off the table in any arms control negotiations with Russia and China.** “Champion the benefits of missile defense. Despite its deterrence and damage-limitation benefits, opponents argue incorrectly that U.S. missile defense is destabilizing because it threatens Russian and Chinese second-strike capabilities. 1. Reject claims made by the Left that missile defense is destabilizing while acknowledging that Russia and China are developing their own advanced missile defense systems. 2. Commit to keeping homeland missile defense off the table in any arms control negotiations with Russia and China.<sup>42</sup>” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended abandoning existing missile defense policy of only using homeland missile defense against rogue nations.** “Change U.S. missile defense policy. Historically, the U.S. has chosen to rely solely on deterrence to address the Russian and Chinese ballistic missile threat to the homeland and to use homeland missile defense only against rogue nations. 1. Abandon the existing policy of not defending the homeland against Russian and Chinese ballistic missiles and focus on how to improve defense as the Russian and Chinese missile threats increase at an unprecedented rate.<sup>45</sup> 2. Invest in future advanced missile defense technologies like directed energy or space-based missile defense that could defend against more numerous missile threats.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

## China

**Project 2025: “The next conservative President must end the Left’s social experimentation with the military, restore warfighting as its sole mission, and set defeating the threat of the Chinese Communist Party as its highest priority.”** “Finally, the President can restore public confidence and accountability to our most important government function of all: national defense. The American people desire a military full of highly skilled servicemen and women who can protect the homeland and our interests overseas. The next conservative President must end the Left’s social experimentation with the military, restore warfighting as its sole mission, and set defeating the threat of the Chinese Communist Party as its highest priority” [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025 railed against trade with China, arguing it has “imported China’s anti-American values into their C-suites.”** “The same goals are the heart of elite support for economic globalization. For 30 years, America’s political, economic, and cultural leaders embraced and enriched Communist China and its genocidal Communist Party while hollowing out America’s industrial base. What may have started out with good intentions has now been made clear. Unfettered trade with China has been a catastrophe. It has made a handful of American corporations enormously profitable while twisting their business incentives away from the American people’s needs. For a generation, politicians of both parties promised that engagement with Beijing would grow our economy while injecting American values into China. The opposite has happened. American factories have closed. Jobs have been outsourced. Our manufacturing economy has been financialized. And all along, the corporations profiting failed to export our values of human rights and freedom; rather, they imported China’s anti-American values into their C-suites.” [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025 called TikTok “in effect a tool of Chinese espionage.”** “If you want to understand the danger posed by collaboration between Big Tech and the CCP, look no further than TikTok. The highly addictive video app, used by 80 million Americans every month and overwhelmingly popular among teenage girls, is in effect a tool of Chinese espionage. The ties between TikTok and the Chinese government are not loose, and they are not coincidental.” [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Economic engagement with China should be ended, not rethought.”** [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025 argued TikTok and “Confucius Institutes” should be outlawed and any University taking CCP money should lose their accreditation and eligibility for federal funds.** “Confucius Institutes, TikTok, and any other arm of Chinese propaganda and espionage should be outlawed, not merely monitored. Universities taking money from the CCP should lose their accreditation, charters, and eligibility for federal funds.” [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025: “U.S. defense strategy must identify China unequivocally as the top priority for U.S. defense planning.”** “In this light, U.S. defense strategy must identify China unequivocally as the top priority for U.S. defense planning while modernizing and expanding the U.S. nuclear arsenal and sustaining an efficient and effective counterterrorism enterprise.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025: “U.S. defense planning should focus on China and, in particular, the effective denial defense of Taiwan.”** “Prioritize a denial defense against China. U.S. defense planning should focus on China and, in particular, the effective denial defense of Taiwan. This focus and priority for U.S. defense activities will deny China the first island chain.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 suggested the prioritization of American “conventional force planning construct to defeat a Chinese invasion of Taiwan before allocating resources to other missions, such as simultaneously fighting another conflict.”** “This focus and priority for U.S. defense activities will deny China the first island chain. 1. Require that all U.S. defense efforts, from force planning to employment and posture, focus on ensuring the ability of American forces to prevail in the pacing scenario and deny China a fait accompli against Taiwan. 2. Prioritize the U.S. conventional force planning construct to defeat a Chinese invasion of Taiwan before allocating resources to other missions, such as simultaneously fighting another conflict.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for countering China’s Belt and Road Initiative globally.** “Counter China’s Belt and Road Initiative (BRI) globally. DOD, in conjunction with the Interagency, allies, and partner nations, must work proactively to counter China’s BRI around the globe.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 called China a “tyrannical country” whose designs were “serious and dangerous.”** “The designs of the People’s Republic of China (PRC) and the Chinese Communist Party, which runs the PRC, are serious and dangerous.<sup>9</sup> This tyrannical country with a population of more than 1 billion people has the vision, resources, and patience to achieve its objectives. Protecting the United States from the PRC’s designs requires an unambiguous offensive-defensive mix, including protecting American citizens and their interests, as well as U.S. allies, from PRC attacks and abuse that undermine U.S. competitiveness, security, and prosperity.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 stated their belief that PRC should be seen by the U.S. government more as a threat than a competitor.** “The United States must have a cost-imposing strategic response to make Beijing’s aggression unaffordable, even as the American economy and U.S. power grow. This stance will require real, sustained, near-unprecedented U.S. growth; stronger partnerships; synchronized economic and security policies; and American energy independence—but above all, it will require a very honest perspective about the nature and designs of the PRC as more of a threat than a competitor.<sup>10</sup> The next President should use the State Department and its array of resources to reassess and lead this effort, just as it did during the Cold War.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the drafting of an Article X for China.** “The U.S. government needs an Article X for China,<sup>11</sup> and it should be a presidential mandate. Along with the National Security Council, the State Department should draft an Article X, which should be a deeply philosophical look at the China challenge.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 does not believe in a moderate approach to China, saying that type of strategy has “demonstrably failed.”** “On the other hand, others acknowledge the dangers posed by the PRC, but believe in a moderating approach to accommodate its rise, a policy of ‘compete where we must, but cooperate where we can,’ including on issues like climate change. This strategy has demonstrably failed.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 argued that the issues with PRC are “rooted in China’s strategic culture” so their “internal culture and civil society will never deliver a more normative nation.”** “As with all global struggles with Communist and other tyrannical regimes, the issue should never be with the Chinese people but with the Communist dictatorship that oppresses them and threatens the well-being of nations across the globe.<sup>12</sup> That said, the nature of Chinese power today is the product of history, ideology, and the institutions that have governed China during the course of five millennia, inherited by the present Chinese leaders from the preceding generations of the CCP.<sup>13</sup> In short, the PRC challenge is rooted in China’s strategic culture and not just the Marxism–Leninism of the CCP, meaning that internal culture and civil society will never deliver a more normative nation. The PRC’s aggressive behavior can only be curbed through external pressure.” [Department of State, Project 2025, accessed [6/24/24](#)]

## Iran

**Project 2025 argued Iran was “at its weakest state in its history and is at odds not only with its own people but also its regional neighbors.”** “The ongoing protests in the Islamic Republic of Iran (Iran), which are widely viewed as a new revolution, have shown that the Islamic regime, which has been in power since 1979 when Ayatollah Khomeini became the leader, is at its weakest state in its history and is at odds not only with its own people but also its regional neighbors.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 claimed the Iran nuclear deal gave Iran “a crucial monetary lifeline.”** “Unfortunately, the Obama and Biden Administrations have propped up the brutal Islamist theocracy that has hurt the Iranian people and threatened nuclear war. For example, the Obama Administration’s 2015 Joint Comprehensive Plan of Action, commonly referred to as the Iran nuclear deal, gave the Islamic regime a crucial monetary lifeline after the Green Movement protests in 2009, which, while ultimately unsuccessful, did succeed in weakening the regime and showing the world that younger Iranians want freedom.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 argued it was in the U.S.’s and the Iranian people’s best interest to have a democratic government, and the U.S. could use economic and diplomatic tools to help Iran become free.** “The next Administration should neither preserve nor repeat the mistakes of the Obama and Biden Administrations. The correct future policy for Iran is one that acknowledges that it is in U.S. national security interests, the Iranian people’s human rights interests, and a broader global interest in peace and stability for the Iranian people to have the democratic government they demand. This decision to be free of the country’s abusive leaders must of course be made by the Iranian people, but the United States can utilize its own and others’ economic and diplomatic tools to ease the path toward a free Iran and a renewed relationship with the Iranian people.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for broadly blocking “Iranian ambitions” which includes expanding Trump administration-imposed sanctions.** “I First, the U.S. must prevent Iran from acquiring nuclear technology and delivery capabilities and more broadly block Iranian ambitions. This means, inter alia, reinstating and expanding Trump Administration sanctions; providing security assistance for regional partners; supporting, through public diplomacy and otherwise, freedom-seeking Iranian people in their revolt against the mullahs; and ensuring Israel has both the military means and the political support and flexibility to take what it deems to be appropriate measures to defend itself against the Iranian regime and its regional proxies Hamas, Hezbollah, and Palestinian Islamic Jihad.” [Department of State, Project 2025, accessed [6/24/24](#)]

#### Venezuela

**Project 2025 called on the next administration to “unite the [western] hemisphere against this significant but underestimated threat in the Southern Hemisphere.”** “To contain Venezuela’s Communism and aid international partners, the next Administration must take important steps to put Venezuela’s Communist abusers on notice while making strides to help the Venezuelan people. The next Administration must work to unite the hemisphere against this significant but underestimated threat in the Southern Hemisphere.” [Department of State, Project 2025, accessed [6/24/24](#)]

#### North Korea

**Project 2025 called for deterrence of North Korea and said they “cannot permit the DPRK to remain a de facto nuclear power with the capacity to threaten the United States or its allies.”** “Peace and stability in Northeast Asia are vital interests of the United States. The Republic of Korea (South Korea) and Japan are critical allies for ensuring a free and open Indo–Pacific. They are indispensable military, economic, diplomatic, and technology partners. The Democratic People’s Republic of Korea (DPRK, or North Korea) must be deterred from military conflict. The United States cannot permit the DPRK to remain a de facto nuclear power with the capacity to threaten the United States or its allies. This interest is both critical to the defense of the American homeland and the future of global nonproliferation. The DPRK must not be permitted to profit from its blatant violations of international commitments or to threaten other nations with nuclear blackmail. Both interests can only be served if the U.S. disallows the DPRK’s rogue regime behavior.” [Department of State, Project 2025, accessed [6/24/24](#)]

#### Mexico

**Project 2025 called Mexico a “national security disaster” that could “no longer qualify as a first-world nation.”** “A ‘sovereign Mexico’ policy. Mexico is currently a national security disaster. Bluntly stated, Mexico can no longer qualify as a first-world nation; it has functionally lost its sovereignty to muscular criminal cartels that effectively run the country. The current dynamic is not good for either U.S. citizens or Mexicans, and the perfect storm created by this cartel state has negative effects that are damaging the entire hemisphere. The next Administration must both adopt a posture that calls for a fully sovereign Mexico and take all steps at its disposal to support that result in as rapid a fashion as possible.” [Department of State, Project 2025, accessed [6/24/24](#)]

## South and Central Asia

**Project 2025 recommended prioritizing the U.S. relationship with India, calling them “an important emerging U.S. economic partner.”** “Many key American interests and responsibilities are found in South and Central Asia. Specifically, continuing to advance the bilateral relationship with India to mutual benefit is a crucial objective for U.S. policy. India plays a crucial role in countering the Chinese threat and securing a free and open Indo–Pacific. It is a critical security guarantor for the key routes of air and sea travel linking East and West and an important emerging U.S. economic partner.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The priority for statecraft is advancing the U.S.–Indian role as a cornerstone of the Quad, a cooperative framework including the U.S., India, Japan, and Australia.”** “The priority for statecraft is advancing the U.S.–Indian role as a cornerstone of the Quad, a cooperative framework including the U.S., India, Japan, and Australia. The Quad is comprised of the key nations in coordinating efforts for a free and open Indo–Pacific. It is an overarching group that nests the key U.S. bilateral and trilateral cooperative efforts that facilitate U.S. collaborative efforts across the Indo–Pacific.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: “There can be no expectation of normal relations with either” the Taliban in Afghanistan or the military-political rule in Pakistan.** “While American statecraft should also seek to improve bilateral relations throughout the region, U.S. policy must be clear-eyed and realistic about the perfidiousness of the Taliban regime in Afghanistan and the military–political rule in Pakistan. There can be no expectation of normal relations with either.” [Department of State, Project 2025, accessed [6/24/24](#)]

## Nuclear Capacity

**Project 2025 recommends expanding the U.S. nuclear arsenal.** “In this light, U.S. defense strategy must identify China unequivocally as the top priority for U.S. defense planning while modernizing and expanding the U.S. nuclear arsenal and sustaining an efficient and effective counterterrorism enterprise.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the modernization and expansion of the U.S. nuclear arsenal to deter Russia and China simultaneously.** “Implement nuclear modernization and expansion. The United States manifestly needs to modernize, adapt, and expand its nuclear arsenal. Russia maintains and is actively brandishing a very large nuclear arsenal, but China is also undertaking a historic nuclear breakout. 1. Expand and modernize the U.S. nuclear force so that it has the size, sophistication, and tailoring to deter Russia and China simultaneously. 2. Develop a nuclear arsenal with the size, sophistication, and tailoring— including new capabilities at the theater level—to ensure that there is no circumstance in which America is exposed to serious nuclear coercion.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the prioritization of nuclear modernization.** “Prioritize nuclear modernization. All components of the nuclear triad are far beyond their intended lifetimes and will need to be replaced over the next decade. This effort is required for the U.S. to maintain its nuclear triad—and will be the bare minimum needed to maintain U.S. strategic nuclear deterrence.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended accelerated efforts to restore plutonium pit production and investments in the National Laboratories facilities to support nuclear weapons development.**

“Restore the nuclear infrastructure. The United States must restore its necessary nuclear infrastructure so that it is capable of producing and maintaining nuclear weapons 1. Accelerate the effort to restore plutonium pit production, which is essential both for modern warhead programs and for recapitalizing the stockpile. 2. Continue to invest in rebuilding infrastructure, including facilities at the National Laboratories that support nuclear weapons development. 3. Restore readiness to test nuclear weapons at the Nevada National Security Site to ensure the ability of the U.S. to respond quickly to asymmetric technology surprises.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

## Alliances

**Project 2025 calls for increased allied conventional defense burden-sharing.** “Increase allied conventional defense burden-sharing. U.S. allies must take far greater responsibility for their conventional defense. U.S. allies must play their part not only in dealing with China, but also in dealing with threats from Russia, Iran, and North Korea. 1. Make burden-sharing a central part of U.S. defense strategy with the United States not just helping allies to step up, but strongly encouraging them to do so.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the transformation of NATO so “that U.S. allies are capable of fielding the great majority of the conventional forces required to deter Russia while relying on the United States primarily for our nuclear deterrent.”** “Transform NATO so that U.S. allies are capable of fielding the great majority of the conventional forces required to deter Russia while relying on the United States primarily for our nuclear deterrent, and select other capabilities while reducing the U.S. force posture in Europe.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants the U.S. to increase their foreign military sales.** “The United States must regain its role as the ‘Arsenal of Democracy.’ In fiscal year (FY) 2021, U.S. government foreign military sales (FMS) nosedived to a low of \$34.8 billion from a record high of \$55.7 billion in FY 2018.8 This decrease hinders interoperability with partners and allies, decreases defense industrial base capacity, and increases the taxpayer burden on the U.S. military’s own procurements. Under previous Administrations, the United States built its reputation as a reliable partner with a strong defense industrial base that could supply military articles and goods in a timely manner. Today’s FMS process is encumbered by byzantine bureaucracy, long contracting times, high costs, and mundane technology. The United States can change this downward trajectory by improving internal processes that incentivize partners and allies to procure U.S. defense systems, thereby expanding our ‘defense ecosystem.’ We must reverse the recent dip in FMS to ensure both that our partners remain interoperable with the United States and that our defense industrial base regains much-needed capacity in preparation for future challenges.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the next president to “must significantly reorient the U.S. government’s posture toward friends and adversaries alike” which “could represent the most significant shift in core foreign policy principles and corresponding action since the end of the Cold War.”** “That said, the next President must significantly reorient the U.S. government’s posture toward friends and adversaries alike—which will include much more honest assessments about who are friends and who are not. This reorientation could represent the most significant shift in core foreign policy principles and corresponding action since the end of the Cold War.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: “At stake after 2024 will be examining the status of the Wales Pledge of 2 percent of gross domestic product toward defense by NATO members. The new Administration will also want to encourage nations to exceed that pledge.”** “First, the Europe, Eurasia, and Russia region is made up of relatively wealthy and technologically advanced societies that should be expected to bear a fair share of both security needs and global security architecture: The United States cannot be expected

to provide a defense umbrella for countries unwilling to contribute appropriately. At stake after 2024 will be examining the status of the Wales Pledge of 2 percent of gross domestic product toward defense by NATO members. The new Administration will also want to encourage nations to exceed that pledge.” [Department of State, Project 2025, accessed [6/24/24](#)]

## USCYBERCOM

**Project 2025 called for the elimination of USCYBERCOM’s efforts to protect U.S. elections from bad actors in cyberspace including foreign actors.** “End USCYBERCOM’s participation in federal efforts to ‘fortify’ U.S. elections to eliminate the perception that DOD is engaging in partisan politics.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

## Foreign Affairs

### Toplines

- ✓ Withdraws from treaties and alliances, including NATO.
- ✓ Re-implements the “Remain in Mexico” policy.
- ✓ Guts humanitarian aid for countries in need.
- ✓ Eliminates the Export-Import Bank, or reduces its efficacy.
- ✓ Ends economic engagement with China and imposes drastic tariffs.

### Countries of Interest

**Project 2025 recommended focusing most on: China, Iran, Venezuela, Russia, and North Korea.** “In a world on fire, a handful of nations require heightened attention. Some represent existential threats to the safety and security of the American people; others threaten to hurt the U.S. economy; and others are wild cards, whose full threat scope is unknown but nevertheless unsettling. The five countries on which the next Administration should focus its attention and energy are China, Iran, Venezuela, Russia, and North Korea.” [Department of State, Project 2025, accessed [6/24/24](#)]

### Personnel

**Project 2025 on the State Department: “The next Administration must take swift and decisive steps to reforge the department into a lean and functional diplomatic machine that serves the and, thereby, the American people.”** “The American people need and deserve a diplomatic machine fully focused on the national interest as defined through the election of a President who sets the domestic and international agenda for the nation. The next Administration must take swift and decisive steps to reforge the department into a lean and functional diplomatic machine that serves the and, thereby, the American people.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The next President can make the State Department more effective by providing a clear foreign policy vision, selecting political officials and career diplomats that will enthusiastically turn that vision into a policy agenda, and firmly supporting the State Department as it makes the necessary institutional adjustments.”** [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the next president to place their State appointees “directly into [their] roles, pending confirmation” – thereby circumventing the Senate confirmation process.** “Exert Leverage During the Confirmation Process. Notwithstanding the challenges and slowness of the modern U.S. Senate confirmation process, the next President can exert leverage on the Senate if he or she is willing to place State Department appointees directly into those roles, pending confirmation. Doing so would both ensure that the department has immediate senior political leadership and would force the Senate to act

on nominees' appointments instead of being allowed to engage in dilatory tactics that cripple the State Department's functionality for weeks, months, or even years." [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the placement of political appointees into positions that do not require Senate confirmation and urged increasing the number of political appointees.** "Assert Leadership in the Appointment Process. The next Administration should assert leadership over, and guidance to, the State Department by placing political appointees in positions that do not require Senate confirmation, including senior advisors, Principal Deputy Assistant Secretaries, and Deputy Assistant Secretaries. Given the department's size, the next Administration should also increase the number of political appointees to manage it." [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the next conservative administration to accept the resignations of all political ambassadors and review and reassess all career ambassadors as well.** "Reboot Ambassadors Worldwide. All ambassadors are required to submit letters of resignation at the start of a new Administration. Previous Republican Administrations have accepted the resignations of only the political ambassadors and allowed the foreign service ambassadors to retain their posts, sometimes for months or years into a new Administration.<sup>5</sup> The next Administration must go further: It should both accept the resignations of all political ambassadors and quickly review and reassess all career ambassadors. This review should commence well before the new Administration's first day." [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: "Political ambassadors with strong personal relationships with the President should be prioritized for key strategic posts such as Australia, Japan, the United Kingdom, the United Nations, and the North Atlantic Treaty Organization (NATO)."** "Ambassadors in countries where U.S. policy or posture would substantially change under the new Administration, as well as any who have evinced hostility toward the incoming Administration or its agenda, should be recalled immediately. The priority should be to put in place new ambassadors who support the President's agenda among political appointees, foreign service officers, and civil service personnel, with no predetermined percentage among these categories. Political ambassadors with strong personal relationships with the President should be prioritized for key strategic posts such as Australia, Japan, the United Kingdom, the United Nations, and the North Atlantic Treaty Organization (NATO)." [Department of State, Project 2025, accessed [6/24/24](#)]

## Treaties

**Project 2025: "Upon inauguration, the Secretary of State should order an immediate freeze on all efforts to implement unratified treaties and international agreements, allocation of resources, foreign assistance disbursements, domestic and international contracts and payments, hiring and recruiting decisions, etc."** "Review Retroactively. Before inauguration, the President-elect's department transition team should assess every aspect of State Department negotiations and funding commitments. Upon inauguration, the Secretary of State should order an immediate freeze on all efforts to implement unratified treaties and international agreements, allocation of resources, foreign assistance disbursements, domestic and international contracts and payments, hiring and recruiting decisions, etc., pending a political appointee-driven review to ensure that such efforts comport with the new Administration's policies. The quality of this review is more important than speed. The posture of the department during this review should be an unwavering desire to prioritize the American people—including a recognition that the federal government must be a diligent steward of taxpayer dollars." [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the "thorough review" and "likely jettisoning" of the Biden administration approving and enforcing treaties without Senate ratification.** "At time of publication, the State Department is negotiating (or seeking to negotiate) large-scale, sovereignty-eroding agreements that could come at considerable economic and other costs to the American people. Although such agreements should be evaluated and approved as are treaties, the Biden Administration is likely to simply



call them ‘agreements.’ The Biden State Department not only approves but also enforces treaties that have not been ratified by the U.S. Senate. This practice must be thoroughly reviewed—and most likely jettisoned.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the next president to “direct the Secretary of State to freeze any ongoing treaty or international agreement negotiations and assess whether those efforts align with the new President’s foreign policy direction.”** “The next President should recalibrate how the State Department handles treaties and agreements, primarily by restoring constitutionality to these processes. He or she should direct the Secretary of State to freeze any ongoing treaty or international agreement negotiations and assess whether those efforts align with the new President’s foreign policy direction.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the next administration to direct the “immediate stand-down on enforcement of any treaties that have not been ratified by the Senate.”** “The next Administration should also direct the secretary to order an immediate stand-down on enforcement of any treaties that have not been ratified by the Senate, and order a thorough review of the degree to which such enforcement has impacted the department’s functions, policies, and use of resources.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for a review to identify “agreements” that were really treaties as understood by the Constitution, and suspend compliance pending Senate approval.** “The Secretary of State, in cooperation with the Office of the Attorney General and the White House Counsel’s Office, should also conduct a review to identify ‘agreements’ that are really treaty commitments within the ordinary public meaning of the Constitution,<sup>6</sup> and suspend compliance pending presidential transmittal of those agreements to the Senate for advice and consent.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the next administration “to withdraw from treaties that have been under Senate consideration for 20 years or more.”** “The next Administration should also move to withdraw from treaties that have been under Senate consideration for 20 years or more, with the understanding that those treaties are unlikely to be ratified. Under circumstances in which ratification of a stale treaty before the Senate still serves national interests, the treaty letter of transmittal and submission should be updated for current circumstances. The Secretary of State must revoke most outstanding C-175 authorities that have been granted to other agencies during previous Administrations, although such revocations should be closely coordinated with the White House for logistical reasons.” [Department of State, Project 2025, accessed [6/24/24](#)]

## Visas

**Project 2025 called for mandatory visa reciprocity with other countries.** “Visa reciprocity. The United States should strictly enforce the doctrine of reciprocity when issuing visas to all foreign nationals. For too long, the U.S. has provided virtually unfettered access to foreign nationals from countries that do not respond in kind—including countries that are actively hostile to U.S. interests and nationals. Mandatory reciprocity will convey the necessary reality that other countries do not have an unfettered right to U.S. access and must reciprocally offer favorable visa-based access to U.S. nationals. The State Department’s reaction time to other countries’ changes in visa policies with respect to the U.S. must be streamlined to ensure it can be updated in real time.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the full enforcement of section 243(d) of the INA to motivate countries to accept the return of nationals who were ordered to be removed from the U.S. Countries that do not comply would risk the suspension of all immigrant and nonimmigrant visas.** “Section 243(d) visa sanctions. Visa sanctions under section 243(d) of the Immigration and Nationality Act (INA),<sup>8</sup> enacted into law to motivate countries to accept the return of any nationals who have been ordered removed from the U.S., should be quickly and fully enforced. Recalcitrant countries that do not accept receipt of their returned nationals will risk the suspension of issuance of all immigrant visas, all

nonimmigrant visas, or all visas. These country-specific sanctions should remain in place until the sanctioned country accepts the return of all its removal-pending nationals and formally commits to future, regular acceptance of its nationals. Blackletter implementation of this law will demonstrate a heretofore lacking seriousness to the international community that other nations must respect U.S. immigration laws and work with federal authorities to accept returning nationals—or lose access to the United States.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the reevaluation of the: Diversity Visa program, the F visa program, and J visa program.** “Evaluation of national security–vulnerable visa programs. To protect the American people, the State Department, in coordination with the White House and other security-focused agencies, should evaluate several key security-sensitive visa programs that it manages. Key programs include, but should not be limited to, the Diversity Visa program, the F (student) visa program, and J (exchange visitor) visa program. The State Department’s evaluation must ensure that these programs are not only consistent with White House immigration policy, but also align with its national security obligations and resource limitations.” [Department of State, Project 2025, accessed [6/24/24](#)]

## Refugees

**Project 2025 called for the U.S. Refugee Admission Program to be indefinitely curtailed until the border “crisis can be contained and refugee-focused screening and vetting capacity can reasonably be restored.”** “The federal government’s obligation to shift national security–essential screening and vetting resources to the forged border crisis will necessitate an indefinite curtailment of the number of USRAP refugee admissions. The State Department’s Bureau of Population, Refugees, and Migration, which administers USRAP, must shift its resources to challenges stemming from the current immigration situation until the crisis can be contained and refugee-focused screening and vetting capacity can reasonably be restored.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the “reimplementation of the Remain in Mexico policy”, calling it a Day One priority.** “Strengthening bilateral and multilateral immigration-focused agreements. Restoration of both domestic security and the integrity of the U.S. immigration system should start with rapid reactivation of several key initiatives in effect at the conclusion of the Trump Administration. Reimplementation of the Remain in Mexico policy, safe third-country agreements, and other measures to address the influx of non-Mexican asylum applicants at the United States–Mexico border must be Day One priorities. Although the State Department must rein in the C-175 authorities of other agencies, the Department of Homeland Security should retain (or regain) C-175 authorities for negotiating bilateral and multilateral security agreements.” [Department of State, Project 2025, accessed [6/24/24](#)]

## Fentanyl

**Project 2025 said the Western Hemisphere partners should work to stop the fentanyl crisis in the U.S. and Mexico.** “A fentanyl-free frontier. The same cartels that parasitically run Mexico are also working with the PRC to fuel the largest drug crisis in the history of North America. These Mexican cartels are working closely with Chinese fentanyl precursor chemical manufacturers, importing those precursor chemicals into Mexico, manufacturing fentanyl on Mexican soil, and shipping it into the United States and elsewhere. The highly potent narcotic is having an unprecedented lethal impact on the American citizenry. The next Administration must leverage its new insistence on a sovereign Mexico and work with other Western Hemisphere partners to halt the fentanyl crisis and put a decisive end to this unprecedented public health threat.” [Department of State, Project 2025, accessed [6/24/24](#)]

## Global Manufacturing and Supply Chains

**Project 2025 called for a shift in global manufacturing and industry from places far away (like China) and move them towards Central and South American countries.** “First, the United States must do everything possible, with both resources and messaging, to shift global manufacturing and industry from more distant points around the globe (especially from the increasingly hostile and human

rights-abusing PRC) to Central and South American countries. ‘Re-hemisphering’ manufacturing and industry closer to home will not only eliminate some of the more recent supply-chain issues that damaged the U.S. economy but will also represent a significant economic improvement for parts of the Americas in need of growth and stabilization.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 advocated for a “hemisphere-focused energy policy” to reduce reliance on fossil fuels and increase energy production.** “Similarly, the United States must work with Mexico, Canada, and other countries to develop a hemisphere-focused energy policy that will reduce reliance on distant and manipulable sources of fossil fuels, restore the free flow of energy among the hemisphere’s largest producers, and work together to increase energy production, including for nations that are looking for dramatic economic expansion.” [Department of State, Project 2025, accessed [6/24/24](#)]

## Middle East

**Project 2025 urged the next administration to encourage “other Arab states, including Saudi Arabia, to enter the Abraham Accords.”** “Second, the next Administration should build on the Trump Administration’s diplomatic successes by encouraging other Arab states, including Saudi Arabia, to enter the Abraham Accords.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the reversal of the Biden administration’s “degradation of the long-standing partnership with Saudi Arabia.”** “Related policies should include reversing, as appropriate, the Biden Administration’s degradation of the long-standing partnership with Saudi Arabia.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Relations with Saudi Arabia should be strengthened in a way that seriously curtails Chinese influence in Riyadh.”** “For the foreseeable future— and much longer than one new Administration—Middle Eastern oil will play a key role in the world economy. Therefore, the U.S. must continue to support its allies and compete with its economic adversaries, including China. Relations with Saudi Arabia should be strengthened in a way that seriously curtails Chinese influence in Riyadh.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The Palestinian Authority should be defunded.”** [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 identified keeping Turkey as a NATO ally as a “key priority.”** “A further key priority is keeping Türkiye in the Western fold and a NATO ally. This includes a vigorous outreach to Türkiye to dissuade it from ‘hedging’ toward Russia or China, which is likely to require a rethinking of U.S. support for YPG/PKK [People’s Protection Units/Kurdistan Worker’s Party] Kurdish forces, which Ankara believes are an existential threat to its security.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: “is in the U.S. national interest to build a Middle East security pact that includes Israel, Egypt, the Gulf states, and potentially India, as a second ‘Quad’ arrangement.”** “Third, it is in the U.S. national interest to build a Middle East security pact that includes Israel, Egypt, the Gulf states, and potentially India, as a second ‘Quad’ arrangement. Protecting freedom of navigation in the Gulf and in the Red Sea/Suez Canal is vital to the world economy and therefore to U.S. prosperity as well. In North Africa, security cooperation with European allies, especially France, will be vital to limit growing Islamist threats and the incursion of Russian influence through positionings of the Wagner Group.” [Department of State, Project 2025, accessed [6/24/24](#)]

## Sub-Saharan Africa

**Project 2025: “African nations are particularly (and reasonably) non-receptive to the U.S. social policies such as abortion and pro-LGBT initiatives being imposed on them.”** “Focus on core diplomatic activities, and stop promoting policies birthed in the American culture wars. African nations are particularly (and reasonably) non-receptive to the U.S. social policies such as abortion and pro-LGBT

initiatives being imposed on them. The United States should focus on core security, economic, and human rights engagement with African partners and reject the promotion of divisive policies that hurt the deepening of shared goals between the U.S. and its African partners.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended moving away from only humanitarian aid and moving toward economic free market development in the country.** “Shift strategic focus from assistance to growth. Reorient the focus of U.S. overseas development assistance away from stand-alone humanitarian development aid and toward fostering free market systems in African countries by incentivizing and facilitating U.S. private sector engagement in these countries. Development aid alone does little to develop countries and can fuel corruption and violent conflict. While the United States should always be willing to offer emergency and humanitarian relief, both U.S. and African long-term interests are better served by a free market-based, private growth-focused strategy to Africa’s economic challenges.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the prioritization of countering Chinese activity in Africa.** “Counter malign Chinese activity on the continent. This should include the development of powerful public diplomacy efforts to counter Chinese influence campaigns with commitments to freedom of speech and the free flow of information; the creation of a template ‘digital hygiene’ program that African countries can access to sanitize and protect their sensitive communications networks from espionage by the PRC and other hostile actors; the recognition of Somaliland statehood as a hedge against the U.S.’s deteriorating position in Djibouti; and a focus on supporting American companies involved in industries important to U.S. national interests or that have a competitive advantage in Africa.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The U.S. should support capable African military and security operations through the State Department and other federal agencies responsible for granting foreign military education, training, and security assistance.”** [Department of State, Project 2025, accessed [6/24/24](#)]

## Europe

**Project 2025 argued it was in the national interest to “amplify” transatlantic trade since it lessened Europe’s dependence on China.** “Second, transatlantic trade is a significant part of the global economy, and it is in the U.S. national interest to amplify it, especially because this means weaning Europe of its dependence on China.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended a comprehensive review between trade agreements between the U.S. and EU and urged development of trade deals between the post-Brexit UK.** “However, there are also transatlantic trade tensions that disturb the U.S.–EU relationship and that have been evident across Administrations. The U.S. must undertake a comprehensive review of trade arrangements between the EU and the United States to assure that U.S. businesses are treated fairly and to build productive reciprocity. Outside the EU, trade with the post-Brexit U.K. needs urgent development before London slips back into the orbit of the EU.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged developing new EU allies, especially Central European countries.** “Third, in the wake of Brexit, EU foreign policy now takes place without U.K. input, which disadvantages the United States, given that the U.K. has historically been aligned with many U.S. positions. Therefore, U.S. diplomacy must be more attentive to inner-EU developments, while also developing new allies inside the EU—especially the Central European countries on the eastern flank of the EU, which are most vulnerable to Russian aggression.” [Department of State, Project 2025, accessed [6/24/24](#)]

## Arctic

**Project 2025: “The rate of melting ice during summer months has led to increased interest not only from shipping and tourism sectors, but also from America’s global competitors, who are**

**interested in exploiting the region's strategic importance and accessing its bounty of natural resources.**" "The United States has several strong interests in the Arctic region. The rate of melting ice during summer months has led to increased interest not only from shipping and tourism sectors, but also from America's global competitors, who are interested in exploiting the region's strategic importance and accessing its bounty of natural resources." [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: "The north star of U.S. Arctic policy should remain national sovereignty, safeguarded through robust capabilities as well as through diplomatic, economic, and legal attentiveness."** [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on NATO to "develop and implement an Arctic strategy that recognizes the importance of the region and ensures that Russian use of Arctic waters and resources does not exceed a reasonable footprint."** "The next Administration should embrace the view that NATO must acknowledge that it is, in part, an Arctic alliance. With the likely accession of Finland and Sweden to NATO, every Arctic nation except for Russia will be a NATO member state. NATO has been slow to appreciate that the Arctic is a theater that it must defend, especially considering Russia's brazen aggression against Ukraine. NATO must develop and implement an Arctic strategy that recognizes the importance of the region and ensures that Russian use of Arctic waters and resources does not exceed a reasonable footprint." [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 argued economic freedom could "help to keep the Arctic stable and secure."** "The U.S. should unapologetically pursue American interests in the Arctic by promoting economic freedom in the region. Economic freedom spurs prosperity, innovation, respect for the rule of law, jobs, and sustainability. Most important, economic freedom can help to keep the Arctic stable and secure." [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: "The United States should work with like-minded Arctic nations, including Russia, to raise legitimate concerns about the PRC's so-called Polar Silk-Road ambitions."** "The People's Republic of China has declared itself a 'near-Arctic state,' which is an imaginary term non-existent in international discourse. The United States should work with like-minded Arctic nations, including Russia, to raise legitimate concerns about the PRC's so-called Polar Silk-Road ambitions." [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended that the next administration pursue policies that strengthen ties between the U.S. and Greenland.** "Concerning Greenland, the opening of a U.S. consulate in Nuuk is welcome. A formal year-round diplomatic presence is an effective way for the U.S. to better understand local political and economic dynamics. Furthermore, given Greenland's geographic proximity and its rising potential as a commercial and tourist location, the next Administration should pursue policies that enhance economic ties between the U.S. and Greenland." [Department of State, Project 2025, accessed [6/24/24](#)]

## **International Organizations**

**Project 2025 argued the U.S. should be prepared to withdraw from international organizations if they no longer promote American interests, as defined by the administration.** "When such institutions act against U.S. interests, the United States must be prepared to take appropriate steps in response, up to and including withdrawal. The manifest failure and corruption of the World Health Organization (WHO) during the COVID-19 pandemic is an example of the danger that international organizations pose to U.S. citizens and interests. The next Administration must end blind support for international organizations. If an international organization is effective and advances American interests, the United States should support it. If an international organization is ineffective or does not support American interests, the United States should not support it. Those that are effective will still require constant pressure from U.S. officials to ensure that they remain effective. Serious consideration should also be given to withdrawal from organizations that no longer have value, quietly undermine U.S. interests

or goals, or disproportionately rely on U.S. financial contributions to survive.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 praised the Trump administration for withdrawing from or terminating funding for: The UN Human Rights Council, the UN Educational, Scientific and Cultural Organization, the UN Relief and Works Agency, and the WHO.** “The Trump Administration’s ‘tough love’ approach to international organizations served American interests. For example, the Trump Administration withdrew from, or terminated funding for, the United Nations Human Rights Council, the United Nations Educational, Scientific and Cultural Organization, the United Nations Relief and Works Agency, and the WHO. The results were redeployment of taxpayer dollars to better uses—and other organizations ‘getting the message’ that the United States will not allow itself and its money to be used to undermine its own interests.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025 supported the Geneva Consensus Declaration on Women’s Health and Protection of the Family, which was a Trump administration-era effort to not support abortion.** “It is paramount to create a healthy culture of respect for life, the family, sovereignty, and authentic human rights in international organizations and agencies. To support this goal, the U.S. led an effort during the Trump Administration to forge a consensus among like-minded countries in support of human life, women’s health, support of the family as the basic unit of human society, and defense of national sovereignty. The result was the Geneva Consensus Declaration on Women’s Health and Protection of the Family.<sup>21</sup> All U.S. foreign policy engagements that were produced and expanded under the Obama and Biden Administrations must be aligned with the Geneva Consensus Declaration and the work of the U.S. Commission on Unalienable Human Rights.” [Department of State, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The U.S. government should not and cannot promote or fund abortion in international programs or multilateral organizations.”** “The U.S. government should not and cannot promote or fund abortion in international programs or multilateral organizations. Technically, the United States can prevent its international funding from going toward abortions, but the U.S. will have a greater impact by including like-minded nations and building on the coalition launched through the Geneva Consensus Declaration, with a view to shaping the work of international agencies by functioning as a united front.” [Department of State, Project 2025, accessed [6/24/24](#)]

- **The U.S. joined other countries in the nonbinding international antiabortion declaration, with Pompeo saying there was “no international right to abortion.”** “The United States joined Brazil, Egypt, Hungary, Indonesia and Uganda on Thursday to co-sponsor a nonbinding international antiabortion declaration, in a rebuke of United Nations human rights bodies that have sought to protect abortion access. Secretary of State Mike Pompeo and Health and Human Services Secretary Alex Azar participated in the virtual signing ceremony. The Geneva Consensus Declaration aims to promote women’s health, ‘defends the unborn and reiterates the vital importance of the family,’ Pompeo said at the ceremony. Access to abortion is widely restricted in the other countries to co-sponsor the declaration. ‘There is no international right to abortion,’ Pompeo said. Though the document does not directly address same-sex marriage, the only co-sponsors to have legalized it are Brazil and the United States, while the text’s language affirming the family as ‘the natural and fundamental group unit of society’ has clear meaning for countries that restrict LGBT rights. Among the co-sponsors, the Egyptian government targets LGBT people in a ‘systematic fashion,’ according to a recent Human Rights Watch report, and in Uganda, gay sex is punishable by death.” [Washington Post, [10/22/20](#)]

**Project 2025 argued WHO is “willing to support the suppression of basic human rights.”** “The COVID-19 pandemic made it painfully clear that both international organizations—and some countries—are only too willing to trample human rights in the name of public health. For example, the WHO was, and remains, willing to support the suppression of basic human rights, partially because of its close relationship with human rights abusers like the PRC.” [Department of State, Project 2025, accessed [6/24/24](#)]

## Foreign Aid

**Project 2025: USAID’s next administrator should also be the Director of Foreign Assistance and oversee all foreign assistance.** “The next Administration should take steps to ensure that future foreign assistance clearly and unambiguously supports the President’s foreign policy agenda. For example, the next administrator of the U.S. Agency for International Development, which is technically subordinate to the State Department, should be authorized to take on the additional role of Director of Foreign Assistance with the rank of Deputy Secretary and oversee all foreign assistance. This role—which existed briefly during the George W. Bush Administration before it was eliminated by the Obama Administration—would empower the dual-hatted official to better align and coordinate with the manifold foreign assistance programs across the federal government.” [Department of State, Project 2025, accessed [6/24/24](#)]

## State Department

Project 2025 would **freeze “all efforts to implement unratified treaties” and other foreign policy engagements** “pending a political appointee-driven review” under a Republican Administration. Most saliently pertaining to climate, this would include the Paris Climate Agreement. [[ch. 6](#), p. 174.] Retreating again from the Paris Climate Agreement would establish the United States as an unreliable partner, giving cover to countries like China to do less to cut their own emissions and fueling a vicious cycle of global greenhouse gas emissions.

## USAID

Consistent with other chapters, the plan’s USAID section characterizes current efforts to fight global climate change as “climate extremism” and a “war on fossil fuels,” and it proposes gutting USAID’s international affairs “150 account” and all programs related to international climate. These cuts would occur alongside elimination of programs addressing global gender equality and racism. [[ch. 9](#), p. 254.]

## Export-Import Bank

The [chapter on EXIM](#) contains many troubling proposals, but at its heart is a fundamental confusion over whether to keep the agency in existence at all. It provides two diametrically opposed essays—“The Export-Import Bank Should be Abolished” by Veronique de Rugy and “The Case for the Export-Import Bank” by Jennifer Hazelton—and does not resolve the differences. This indicates that the conservative authors and coalitions behind Project 2025 lack even a basic coherent vision for leading this agency or representing US business interests abroad.

# Environment

## Toplines

- ✓ Slashes EPA’s capabilities and rescinds Biden-era protections
- ✓ Disbands Office of Environmental Justice and External Civil Rights
- ✓ Reverses the Good Neighbor Plan, which secured significant reductions in ozone-forming emissions from power plants and industrial facilities
- ✓ Undermines the effective cleanup of toxic superfund sites
- ✓ Significantly expands drilling sites without regard for environmental impacts
- ✓ Removes protections from national monuments and parks
- ✓ Puts wildlife at risk

**Project 2025: “Those who suffer most from the policies environmentalism would have us enact are the aged, poor, and vulnerable.”** “‘Cheap grace’ aptly describes the Left’s love affair with environmental extremism. Those who suffer most from the policies environmentalism would have us enact are the aged, poor, and vulnerable. It is not a political cause, but a pseudo-religion meant to baptize liberals’ ruthless pursuit of absolute power in the holy water of environmental virtue.” [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025: “At its very heart, environmental extremism is decidedly anti-human.”** “At its very heart, environmental extremism is decidedly anti-human. Stewardship and conservation are supplanted by population control and economic regression. Environmental ideologues would ban the fuels that run almost all of the world’s cars, planes, factories, farms, and electricity grids. Abandoning confidence in human resilience and creativity in responding to the challenges of the future would raise impediments to the most meaningful human activities. They would stand human affairs on their head, regarding human activity itself as fundamentally a threat to be sacrificed to the god of nature.” [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025 argued the U.S.’s oil and natural gas reserves “are not an environmental problem.”** “The next conservative President should go beyond merely defending America’s energy interests but go on offense, asserting them around the world. America’s vast reserves of oil and natural gas are not an environmental problem; they are the lifeblood of economic growth. American dominance of the global energy market would be a good thing: for the world, and, more importantly, for ‘we the people.’” [Foreword, Project 2025, accessed [6/24/24](#)]

## EPA

### [CAP Analysis of Project 2025 on the EPA](#)

#### **Day One Executive Order to slash EPA’s capabilities and weaken its rules**

Most broadly, the plan would downsize EPA by cutting the budget, staff and programs, and “pause and review” major rules and guidance that protect the environment and public health, in order to weaken those protections.

#### *Consequences:*

- Undermine the ability of EPA to safeguard human health and the environment, especially in communities with the highest levels of pollution and climate change threats.
- End or weaken essential environmental and public health protections.

#### **Disband the Office of Environmental Justice and External Civil Rights (OEJECR)**

The newly established [OEJECR](#) leads the agency’s environmental justice priorities and provides resources and technical assistance on civil rights and environmental justice, community engagement, addressing environmental justice concerns, and support for community-led action. The dissolution of this office would rid the EPA of [services and expertise](#) in alternative dispute resolution, environmental conflict resolution, consensus-building, and collaborative problem solving for EJ communities.

#### *Consequences:*

- Increases household energy and health care costs. Preventing the distribution of [\\$2.7 billion](#) in IRA funding to tackle environmental injustices, and more than [\\$50 million](#) in grant funding for community-based organizations, will undermine efforts to clean up pollution in communities and increase energy and health care costs.
- Kills jobs. Dissolving this new national office would upend [5 EJ offices](#) and [200 jobs](#) in EPA headquarters across 10 regions that have been dedicated to solving national environmental challenges.
- Increases pollution and worsens climate, environmental, and public health risks in communities. The plan stops the nearly [\\$3 billion](#) for environmental and climate justice grants supporting community-led air pollution monitoring and prevention, as well as



efforts to protect communities from climate change and extreme weather, heat, and wildfires.

- Undermines EPA's ability to safeguard human health and the environment, especially in communities with the highest levels of pollution and climate change threats. The plan prevents the OEJECR from [coordinating and implementing](#) environmental justice priorities and Justice40 across the agency, including reducing and cleaning up toxic pollution historically concentrated in communities of color and low-income areas.
- Kneecaps enforcement of environmental regulations, community protections, and federal civil rights laws. The plan would pull the plug on technical assistance for and coordination of environmental justice and civil rights priorities, deny communities the ability to raise environmental justice concerns with EPA, and undercut enforcement of federal civil rights laws.

### **Reverse the Good Neighbor Program's 2022 expansion beyond power plants**

The [Good Neighbor Plan](#) "secures significant reductions in ozone-forming emissions of nitrogen oxides from power plants and industrial facilities." In the [final rule](#), 20 states are covered for both fossil-fuel fired power plants and "other industrial stationary sources." These "other industries" include basic chemical manufacturing, combustion engines in pipeline transportation of natural gas, kilns in cement production, boilers in iron and steel mills, and solid waste combustors and incinerators.

Approximately [130 million](#) Americans (40% of U.S. population) live within 50 km of non-power plant facilities, and the demographic make up of populations within 5-10 km is 6% higher for African Americans and 2-4% higher for people living in poverty. Reversing the inclusion of other industries would undo emissions [reductions](#) in the ozone season, annual nitrous oxide emissions, particulate matter, sulfur dioxide, and downwind pollution from industrial facilities, and prevent the reduction of legacy pollution in disadvantaged communities.

#### *Consequences:*

- Increases healthcare costs. Excluding other industries would reverse pollution compliance benefits of up to [\\$15 billion](#) by 2026, and prevent net benefits of up to [\\$200 billion](#) between 2023 and 2042.
- Increases pollution and worsens environmental and public health risks to communities. The plan would [prevent a 15% reduction](#) in industrial nitrogen oxide (NOx) emissions, increase NOx emissions by [45,000 tons](#) from other covered industrial sources, increase annual sulfur dioxide emissions by 29,000 tons, annual fine particle emissions by 1,000 tons, and annual carbon dioxide emissions by 16 million metric tons. Exclusion of other industries would also decrease visibility in national and state parks and [protection](#) for sensitive ecosystems, coastal waters and estuaries, and forests.
- Increases mortality and disease. In 2026 alone, this proposal could cause [1,300](#) premature deaths, more than [2,300](#) hospital and emergency room visits, and increase asthma cases by 1.3 million.
- Educational and economic impacts: the above increases in mortality and disease would cause an estimated 430,000 school absence days and 25,000 lost work days.

### **Project 2025 calls for "Eliminating the stand-alone Office of Enforcement and Compliance Assistance"**

The [OECA](#) is charged with formal and informal enforcement of national [initiatives](#) that address serious noncompliance to national environmental laws. OECA has issued emergency orders to plants, refineries, and other entities for water system [lead violations](#), work safety [crimes](#), sulfur dioxide [emissions](#) and oil releases, chemical plant [pollution](#), and improper [hazardous waste](#) disposal. Eliminating the OECA as a stand-alone office would undermine its crucial oversight and accountability work on behalf of impacted communities.

#### *Consequences:*

- Increases in consumer costs. The plan would prevent the disbursement of [\\$45 billion](#) in non-federal dollars through EPA's water infrastructure finance programs.

- Jobs killed. Past budget cuts have led to losses of [950](#) enforcement positions at EPA nationwide (30% of total OECA workforce), and eliminating OECA could undo the restoration of [200](#) of these positions in FY 2023.
- Worsens climate change and local pollution. The plan would lead to a preventable [21%](#) increase in ozone season emissions of nitrogen oxides from electric power generation, and a preventable release of [6 million](#) metric tons of carbon dioxide equivalent without EPA pollution prevention grant funding, and worsen measured air quality by [10%](#) in communities that don't currently meet NAAQS.
- Increases public health risks and environmental injustice in communities. Eliminating OECA could cause [2,250](#) lung cancer deaths annually from unabated radon exposure, block technical assistance to 2,203 Tribal, small, rural, or underserved communities for drinking water and waste treatment improvements. It would also prevent an increase in inspections in areas of EJ concern to [45%](#) in fiscal year 2022, 50% in FYs 2023 and 2024, and 55% in FYs 2025 and 2026, prevent the initiation of [45](#) proactive post-award civil rights compliance reviews, and would exacerbate discrimination issues in environmentally overburdened and underserved communities.

**Project 2025 details “Immediate and consistent rejection of all EPA Office of Research and Development [ORD] and science activities that have not been authorized by Congress”**

This measure would prohibit the use of scientific determinations to drive regulatory, enforcement, and legal decisions in the EPA and federal government. Requiring the congressional review and authorization of ORD science activities—which span across 3 offices, 4 research centers, 6 [research programs](#) and countless partnerships across industries, academic institutions, trade associations, other agencies, state government and NGOs—would slow, if not completely hinder, the ORD’s ability to deliver accurate, relevant, science-based [risk assessments](#) to the American public.

*Consequences:*

- Harms economic, scientific, and educational progress. The plan would cut over [\\$800 million](#) for scientific research, technology, and education on the climate crisis and Earth’s natural systems.
- Undercuts our nation’s ability to understand, prepare for, and build resilience to climate change and more extreme weather. The plan would stymie scientific advancements in climate change adaptation including [carbon storage](#), fish population [conservation](#), and [wildfire](#) and health impact studies. It would also threaten [community preparedness](#) for extreme weather and potentially gut [tools and models](#) that forecast the ecological and mortality impacts of regional ozone concentrations and pollution.

Threatens public health, safety, and the environment. The plan would halt or limit [integrated efforts](#) across the ORD to publicly release environmental and human health data, advance remediation and restoration of contaminated sites, support sustainable materials management, and waste recovery and reuse.

**Superfunds**

**[CAP Analysis on Project 2025 and Superfund site cleanups](#)**

**Project 2025 would severely undermine the effective cleanup of toxic and hazardous sites to cut costs for industry at the expense of community health and safety.**

The report recommends a new policy that would reduce the effectiveness of hazardous Superfund site cleanups, which are disproportionately located in or near communities of color and low-income areas.

*Consequences:*

- This change would prioritize short-term cleanups to cut costs for polluters while increasing the risk of inadequate cleanups that threaten community health and safety at risk.
- The proposal would also weaken groundwater cleanup regulations and revisit the designation of PFAS chemicals—forever chemicals that pose serious human health risks including cancer, liver, thyroid and reproductive problems, low birthweight and increased risk of birth defects, among others—as “hazardous substances” under CERCLA.

## **Project 2025 would end EOP-led policies and procedures that the Administration alleges are “used to advance radical gender, racial, and equity initiatives”**

The proposal seeks to undo policies and whole-of-government efforts to tackle climate change and advance equity and justice through the Office of Science and Technology Policy (OSTP) and the Council on Environmental Quality (CEQ). It demands the end of EOP-led “policies and procedures that are used to advance radical gender, racial, and equity initiatives.”

### **CAP Analysis on Project 2025 and ending Cumulative Impact Analysis**

More specifically, the plan calls for “**banning the use of cumulative impact analysis**” under the National Environmental Policy Act (NEPA) and seeks to “limit the scope for judicial review of agency NEPA analysis and judicial remedies.” It also recommends “a new executive order to create a unified process for major infrastructure projects that includes giving project proponents more control of any regulatory clocks.”

#### *Consequences:*

- Dismantling these critical EPA and NEPA protections would put polluters over people, giving industry an even stronger voice over the communities most affected by its actions.
- On the whole, the plan’s myriad reactionary EOP proposals would have serious climate change impacts on communities throughout the US and the world. The policy changes would guarantee more pollution, more acute public health and climate threats, and greater economic insecurity in vulnerable communities.
- Disadvantaged communities, including communities of color and low-income areas, already face disproportionate levels of pollution, public health threats, and climate change impacts on top of the many other harms stemming from economic and racial inequality. Undoing all efforts to address these inequities would rob many Americans of their fundamental right to breathe clean air, drink clean water, and live in a healthy and safe environment.

## **Interior**

### **Drill everywhere**

The chapter’s overarching recommendation is a fossil fuel development free-for-all. Despite the fact that DOI manages our nation’s National Parks, Wildlife Refuges, National Monuments, and more, there is scant mention of land conservation. It argues that “**no other initiative is as important for the DOI under a conservative President than the restoration of the department’s historic role managing the nation’s vast storehouse of hydrocarbons**, much of which is yet to be discovered.”

Despite its so-called “energy dominance” agenda, the proposal mentions renewable energy only once, in which it accuses Secretary Deb Haaland of “dramatically increas[ing] production of solar and wind energy” in order to undermine energy dominance. The plan also demands a near doubling of Willow project drilling in the Arctic: “Approve the 2020 Willow [Environmental Impact Statement] ... and expand approval from three to five drilling pads.”

Consistent with this “drill everywhere” approach but contained within a [separate chapter](#) on the State Department, Project 2025 recommends increasing fossil fuel extraction and production *across the entire Western Hemisphere*, ostensibly to “reduce reliance on distant and manipulable sources of fossil fuels,” among other objectives.

The plan’s push for more drilling throughout the Americas specifically urges more fossil fuel exploration and drilling in the Arctic, while offhandedly acknowledging that the oil and gas there will be more accessible due to the rising rate of melting ice caused by climate change. The proposal states, “The rate of melting ice during summer months has led to increased interest not only from shipping and tourism sectors, but also from America’s global competitors, who are interested in exploiting the region’s strategic importance and accessing its bounty of natural resources.”

*Consequences:*

- Aggressive expansion of oil and gas drilling in not only US lands and waters, but across the entire Western Hemisphere, would severely set back efforts to combat climate change.
- Large-scale promotion of drilling throughout the Americas—particularly under a conservative presidency—would exacerbate health and safety harms to marginalized communities, including Native and Indigenous peoples throughout both continents.

**Remove protections from public parks, monuments, and refuges**

From the start, the DOI chapter reinforces Project 2025’s overwhelming ethos that destroying environmental protections is the epitome of a successful conservative Presidency.

The plan posits that Trump’s national monument rollbacks at Bears Ears and Grand Staircase did not go far enough, specifically mentioning additional withdrawals of Katahdin Wood and Waters National Monument in Maine and Cascade-Siskiyou National Monument in Oregon. It also suggests re-opening the failed Zinke-era monument review with a “fresh look at past monument decrees and new ones by President Biden.”

Additional public lands whose protections the plan proposes removing include the Tongass National Forest, Thompson Divide, Arctic National Wildlife Refuge, Western Arctic, Chaco Canyon, and the Boundary Waters. Many of these places are some of the most important and beloved landscapes in the US, and removing protections for public lands is [highly unpopular with the American people](#)—as is “repeal of the Antiquities Act of 1906,” which the plan also recommends.

**Addressing Native American issues with nothing but talking points**

The plan’s recommendations for “fulfilling the nations trust responsibilities to American Indians and Indian nations” border on insulting:

- “End the war on fossil fuels and domestically available minerals and facilitate their development on lands owned by Indians and Indian nations.”
- “End federal mandates and subsidies of electric vehicles.”
- “Secure the nation’s border to protect the sovereignty and safety of tribal lands.”

**Putting wildlife at risk**

The DOI chapter is as hostile to protecting wildlife as it is to protecting public lands. For example, it proposes reinstating the practice of bearbaiting, a cruel practice the [Humane Society describes](#) as “intensive feeding of black bears to make them easier targets of trophy hunters waiting nearby.”

*Consequences:*

- On the whole, Project 2025’s recommendations for public lands and other matters within DOI’s jurisdiction would significantly harm the critical effort to stop climate change, seriously threaten wildlife, and imperil America’s most cherished natural places—all in order to serve the narrow interests of outmoded, polluting industries.

**Energy**

**End grid planning and focus only on “reliability”**

One of the most significant of these changes is the proposal to flat-out “**end grid planning** and focus instead on reliability” concerning FERC, the North American Electric Reliability Corporation (NERC), and DOE’s Grid Deployment Office (GDO). The plan also urges “the funding programs that GDO oversees and administers” to “emphasize grid reliability, not renewables expansion.”

With its fixation on limiting federal involvement in the grid to “reliability” (mostly concerning cybersecurity threats), the proposed policy would do nothing to clear the transmission bottleneck preventing renewable electricity from reaching areas where that power is needed most to complete the transition away from fossil fuels.

*Consequences:*

- Taken on their face, these changes would stop federal efforts to streamline buildout of new transmission and interconnection, a prominent recent example being FERC’s new Interconnection Rule to speed generator connections to the grid.
- The proposal would ironically also stop federal efforts to improve grid reliability in the more practical sense of preventing power shortages and other consequences of insufficient transmission, a goal broadly supported by state and congressional leaders of both parties.

**Defund most Grid Deployment Office programs**

The proposal seeks to “[d]efund most GDO programs,” comprising nearly \$20 billion of IIJA funding, including grid modernization grants and transmission facilitation, urging Congress to “rescind any money not already spent.”

*Consequences:*

- Taken with other proposals, this would seriously reduce the federal government’s involvement in transitioning America’s energy economy to clean sources.

**Eliminate the Loan Program Office**

Most expansively, the plan calls for DOE to stop backing any new loans or loan guarantees, and for Congress to sunset all of DOE’s loan authority, and “eventually eliminate the Loan Program Office” (LPO). LPO has been instrumental in supporting American technological innovation critical to keeping American businesses competitive on the international stage. LPO financing also supports job creation domestically, and to date LPO has supported the creation of over [46,000 permanent jobs](#).

*Consequences:*

- Taken together, the above proposals would significantly harm emissions reduction efforts, as well as remove a significant fiscal promoter of jobs, economic activity, and technological advancement.

**Commerce**

**Toplines**

- ✓ Abolishes the Economic Development Administration
- ✓ Dismantles NOAA
- ✓ Privatizes the National Weather Service
- ✓ Adds a citizenship question to the U.S. Census
- ✓ Eliminates funding for the Minority Business Development Agency

**Office of the Secretary**

**Project 2025 called for the abolishment of any advisory committee if they are not required by statute.** “Due to the nature of the Department of Commerce’s portfolio, many of its advisory committees are populated by activists from organizations openly hostile to conservative principles who use the committees to impede conservative policy. Upon entering office, all such committees should be reviewed regarding whether they are required by statute and abolished if they are not. Membership of the remaining committees should be reconstituted to ensure they are sources of genuine expert advice and productive contributions to the policy-making process. Federal Advisory Committee Act (FACA) compliance and awareness of any ways the committees have been written into regulations should be considered.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

## NOAA

**Project 2025 called for the dismantling of NOAA with “many of its functions eliminated, sent to other agencies, privatized, or placed under the control of states and territories.”** “The National Oceanographic and Atmospheric Administration (NOAA) should be dismantled and many of its functions eliminated, sent to other agencies, privatized, or placed under the control of states and territories.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended that NOAA “be broken up and downsized.”** “Together, these form a colossal operation that has become one of the main drivers of the climate change alarm industry and, as such, is harmful to future U.S. prosperity. This industry’s mission emphasis on prediction and management seems designed around the fatal conceit of planning for the unplannable. That is not to say NOAA is useless, but its current organization corrupts its useful functions. It should be broken up and downsized.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: Each of NOAA’s functions “could be provided commercially, likely at a lower cost and higher quality.”** “NOAA today boasts that it is a provider of environmental information services, a provider of environmental stewardship services, and a leader in applied scientific research. Each of these functions could be provided commercially, likely at lower cost and higher quality.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 claimed that forecasts and warnings provided by private companies like AccuWeather were more reliable than NWS, so called on NWS to “fully commercialize its forecasting operations” and “focus on its data gathering services.”** “Focus the NWS on Commercial Operations. Each day, Americans rely on weather forecasts and warnings provided by local radio stations and colleges that are produced not by the NWS, but by private companies such as AccuWeather. Studies have found that the forecasts and warnings provided by the private companies are more reliable than those provided by the NWS.<sup>2</sup> The NWS provides data the private companies use and should focus on its data-gathering services. Because private companies rely on these data, the NWS should fully commercialize its forecasting operations.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the “commercialization of weather technologies” should be prioritized.** “NOAA does not currently utilize commercial partnerships as some other agencies do. Commercialization of weather technologies should be prioritized to ensure that taxpayer dollars are invested in the most cost-efficient technologies for high quality research and weather data. Investing in different sizes of commercial partners will increase competition while ensuring that the government solutions provided by each contract is personalized to the needs of NOAA’s weather programs. The NWS should be a candidate to become a Performance-Based Organization to better enforce organizational focus on core functions such as efficient delivery of accurate, timely, and unbiased data to the public and to the private sector.<sup>3</sup>” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended transferring NOS Survey operations to the U.S. Coast Guard and the U.S. Geological Survey.** “Transfer NOS Survey Functions to the U.S. Coast Guard and the U.S. Geological Survey. Survey operations have historically accounted for almost half the NOS budget. These functions could be transferred to the U.S. Coast Guard and U.S. Geological Survey to increase efficiency. NOS’ expansion of the National Marine Sanctuaries System should also be reviewed, as discussed below.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended merging the National Marine Fisheries Service and the U.S. Fish and Wildlife Service.** “Overlap exists between the National Marine Fisheries Service and the U.S. Fish and Wildlife Service. Overly simplified, the NMFS handles saltwater species while the Fish and Wildlife Service focuses on fresh water. The goals of these two agencies should be streamlined.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended harmonizing the Magnuson-Stevens Act with the National Marine Sanctuaries Act.** “Harmonize the Magnuson–Stevens Act with the National Marine Sanctuaries Act.

Under the auspices of NOS, marine sanctuaries (including no-fishing zones) are being established country-wide, often conflicting with the goals of the Magnuson–Stevens Act fisheries management authorities of NOAA Fisheries, regional fishery management councils, and relevant states.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 pushed for the withdrawal of the 30x30 EO and the America the Beautiful Initiative, which they claim are being used to close “vast areas of the ocean to commercial activities...while rapidly advancing offshore wind energy development.”** “Withdraw the 30x30 Executive Order and Associated America the Beautiful Initiative. The 30x30 Executive Order and the American the Beautiful Initiative are being used to advance an agenda to close vast areas of the ocean to commercial activities, including fishing, while rapidly advancing offshore wind energy development to the detriment of fisheries and other existing ocean-based industries.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants to “modify regulations implementing the Marine Mammal Protection Act and the Endangered Species Act.** “Modify Regulations Implementing the Marine Mammal Protection Act and the Endangered Species Act. These acts are currently being abused at a cost to fisheries and Native American subsistence activities around the U.S.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

“Allow a NEPA Exemption for Fisheries Actions. All the requirements for robust analysis of the biological, economic, and social impacts of proposed regulatory action in fisheries are contained with the Magnuson–Stevens Act, the guiding Act for fisheries. NEPA overlays these requirements with onerous, redundant, and time-consuming process requirements, which routinely cause unnecessary delays in the promulgation of timely fisheries management actions. The Department of Commerce and the Council on Environmental Quality should collaborate to reduce this redundancy.” .” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The preponderance of” the Office of Oceanic and Atmospheric Research’s climate change research should be disbanded as it contributes to a lot of “NOAA’s climate alarmism.”** “OAR provides theoretical science, as opposed to the applied science of the National Hurricane Center. OAR is, however, the source of much of NOAA’s climate alarmism. The preponderance of its climate-change research should be disbanded. OAR is a large network of research laboratories, an undersea research center, and several joint research institutes with universities. These operations should be reviewed with an aim of consolidation and reduction of bloat.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended breaking up the Office of Marine and Aviation Operations, and reassign its assets to GSA or other agencies.** “Break Up the Office of Marine and Aviation Operations and Reassign Its Assets to Other Agencies During This Process. The Office of Marine and Aviation Operations, which provides the ships and planes used by NOAA agencies, should be broken up and its assets reassigned to the General Services Administration or to other agencies.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended that the Office of Space Commerce work to establish a whole-of-government approach for licensing and oversight of commercial space operations.** “There presently exists no unified U.S. government policy on commercial space operations, with the Federal Communications Commission largely responsible for establishing space policy by default through its regulation of radio spectrum licenses. Now that routine space operations are commercially viable, it is critical that a new Administration establish reasonable government policies that ensure the U.S. will continue to be the flag of choice for commercial space activities. The President should, by executive order, direct the Office of Space Commerce, working with the National Space Council, to establish a whole-of-government policy for licensing and oversight of commercial space operations.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Appointed staff should be in place at the Bureau as early as feasible after a new President takes office. This will require the Office of Personnel Management to allocate additional political appointee positions to the Census Bureau.”** “Strong political leadership is needed to increase efficiency and align the Census Bureau’s mission with conservative principles. Personnel is key to ensuring that a new Administration can guide preparations for the 2030 census and oversee the continued operation of the Bureau’s many surveys. To move bureaucracy on key priorities, appointed staff should be in place at the Bureau as early as feasible after a new President takes office. This will require the Office of Personnel Management to allocate additional political appointee positions to the Census Bureau.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants to review the Census partnership program and urged the next administration “to actively engage with conservative groups and voices to promote response to the decennial census.”** “This program, designed to promote responsiveness to the census by employing trusted voices in various communities, deserves careful scrutiny. A new Administration should work to actively engage with conservative groups and voices to promote response to the decennial census. Promoting response to the decennial census will ensure that the most accurate counts are conducted, leading to a more accurate apportionment of congressional representation and allocation of federal funds. In 2020, lack of conservative participation was one factor in an undercount in some areas of the country, affecting representation of certain states.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged a conservative administration to add a citizenship question to the decennial census despite the Supreme Court ruling that adding it violated the Administrative Procedures Act.** “Despite finding that the Trump Administration’s addition of the citizenship question to the 2020 decennial census violated the Administrative Procedures Act, the Supreme Court held that the Secretary of Commerce does have broad authority to add a citizenship question to the decennial census. Any successful conservative Administration must include a citizenship question in the census. Asking a citizenship question is considered best practice even by the United Nations. By law, the Census Bureau must deliver the decennial census subjects/ topics to Congress three years before Census Day (in this case, by April 1, 2027). Questions must be presented to Congress two years before Census Day (April 1, 2028).” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants a conservative administration to “review forthcoming changes to race and ethnicity questions.”** “Review forthcoming changes to race and ethnicity questions. The current Administration has announced its intent to change data collection methods regarding race and ethnicity by combining the two questions on the decennial questionnaire and increasing the number of available options. A new conservative Administration should take control of this process and thoroughly review any changes. There are concerns among conservatives that the data under Biden Administration proposals could be skewed to bolster progressive political agendas. Government data should be unbiased and trusted—and an incoming conservative Administration should ensure that is the case. This work must be coordinated with the Office of Management and Budget, which governs federal data collection standards via its statistical directives.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 suggested reevaluating all decennial census questions.** “Reevaluate all decennial census questions. Determine how best to optimize use of the decennial census to determine whether current or additional questions provide added value in coordination with other departments that utilize the information. Overly intrusive questions or less crucial data should either be moved to another survey or removed from Census programs entirely.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the Census Bureau National Advisory Committee on Racial, Ethnic, and Other Populations to be “immediately” abolished.** “The Census Bureau National Advisory Committee on Racial, Ethnic, and Other Populations (NAC) was established by the Obama Administration in 2012 and rechartered by the Biden Administration in 2022. The committee is a hotbed for left-wing activists intent upon injecting racial and social-justice theory into the governing philosophy of the Census Bureau. The NAC should immediately be abolished by the incoming Administration. The NAC charter gives the



Secretary of Commerce the authority to terminate the committee. Since the Secretary of Commerce established the NAC in 2012 under the FACA, the Secretary is authorized to terminate the NAC.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The new Administration should also reevaluate and potentially abolish all non-statutory standing committees within the Census Bureau, including the Census Scientific Advisory Committee.”** [Department of Commerce, Project 2025, accessed [6/24/24](#)]

### **Economic Development Administration**

**Project 2025 recommended that the EDA be abolished and that its funding be reallocated to overlapping federal grant programs.** “Rather than implementing the new Department Organization Orders required to put conservative governance in place, it would be more efficient to abolish EDA and reallocate its funding to other overlapping federal grant programs.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants to continue “building on the initial success of Opportunity Zones.** “Building on the initial success of Opportunity Zones, which incentivized over \$75 billion in private sector investment in distressed communities by the end of 2020 with little up-front cost to the taxpayer.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

### **International Trade Administration**

**Project 2025 questioned if the International Trade Administration and parts of the Bureau of Industry and Security should be moved to the USTR.** “Though not an exhaustive set of proposals, the next conservative President should consider whether: I The International Trade Administration (ITA) and parts of the Bureau of Industry and Security (BIS) should be streamlined and moved to the Office of the U.S. Trade Representative (USTR), along with the Development Finance Corporation; the U.S. Trade and Development Agency; the Export– Import Bank; and other trade-related programs spread across the federal government—as well as considering whether many of these programs should exist within the federal government.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Re-establish and expand suspended in-person pandemic-related verifications, particularly regarding the People’s Republic of China. Ensure that verifications are rigorous.”** [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Implement advanced analytics and artificial intelligence to identify opportunities for self-initiation, detect circumvention, and prevent bad actors from gaming the system.”** [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Ensure senior policy and decision-making positions are always held by political appointees.”** [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Revive the China-specific non-market economy unit.”** [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: Top Market Reports could be replaced by industry competitiveness assessments in critical sectors of the economy.** “However, outside of these functions, implementation of I&A’s mission as an intellectual engine for U.S. trade and investment policy can often lack energy and focus. For instance, the Top Market Reports that represent a large volume of I&A work do not serve a specific strategic function and could be better replaced by industry competitiveness assessments in critical sectors of the economy.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: Industry and Analysis should permanently be restructured to perform supply chain analysis, identifying potential vulnerabilities.** “Going forward, I&A should be permanently restructured

to perform supply-chain analysis on an ongoing basis for the U.S. government, identifying potential vulnerabilities like those exposed by the pandemic and resulting shortages in everything from semiconductors to baby formula.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for “strategic decoupling from China, critical supply chains, and emerging technologies to name a few.** “Furthermore, permanent standing teams should be established and staffed by properly aligned political appointees and trusted career staff to analyze and spur action on the following priority policy issues: I Strategic decoupling from China; I Defense industrial base strength; I Critical supply chains (e.g., pharmaceuticals, medical devices, food); and I Emerging technologies (e.g., rare earth minerals, semiconductors, batteries, artificial intelligence, quantum computing).” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 called the “strategic decoupling from China is necessary and, fundamentally, any exports of goods, software, and technology to countries of concern, whether directly or indirectly, should be prohibited or controlled in the absence of good cause.”** “The next few years will prove or disprove the assertion that the U.S. stands on the precipice of a Cold War with China. Many believe that a Cold War has already begun; if so, then strategic decoupling from China is necessary and, fundamentally, any exports of goods, software, and technology to countries of concern, whether directly or indirectly, should be prohibited or controlled in the absence of good cause (e.g., humanitarian and medical aid, food aid).” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended Global Markets be consolidated and to elevate Advocacy Center and SelectUSA to drive large-scale export transactions and foreign direct investment.** “Global Markets should also consolidate and elevate the Advocacy Center and SelectUSA as relatively low-cost tools to drive large-scale export transactions and foreign direct investment (FDI). SelectUSA is a low-cost and effective tool in attracting FDI to the U.S. and to re-shore manufacturing and research and development. In a world in which corruption is rampant, these are among the most effective tools in leveling the playing field for U.S. communities and companies seeking to engage with governments and potential overseas investors.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

## USPTO

**Project 2025 “The U.S. Patent and Trademark Office (USPTO) should be made into a performance-based organization under the Office of Management and Budget (OMB).”** [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended USPTO be consolidated into NIST.** “Alternatively, the USPTO should be consolidated with the National Institute of Standards and Technology (NIST) in a new U.S. Office of Patents, Trademarks, and Standards, with all non-mission-critical research functions eliminated or moved to other, more focused, federal agencies;” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the administration be opposed to efforts to provide intellectual property waivers to cutting-edge technologies, including for COVID-19 vaccines.** “Oppose efforts to provide intellectual property waivers for cutting-edge technologies, including for COVID-19 vaccines and therapeutics, through the World Trade Organization’s Trade-Related Aspects of Intellectual Property Rights agreement or any other mechanism.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

## Economic Development Administration

**Project 2025 recommended the EDA’s grant program be either eliminated or consolidated.** “The Economic Development Administration’s grant programs, which are among a broad set of duplicative and overlapping federal economic development grant programs, should be consolidated with other programs and/or eliminated.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

## Census

**Project 2025: The Census Bureau and Bureau of Economic Analysis should be consolidated.** “The Bureau of Economic Analysis and Census Bureau, as well as the Department of Labor’s Bureau of Labor Statistics, should be consolidated into a more manageable, focused, and efficient statistical agency.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

## Bureau of Industry and Security

**BIS’s authority to overrule other agency votes should be changed.** “Moreover, BIS’s authority to overrule other agency votes should be changed. Each agency should have one equal vote and, if a licensing dispute remains unresolved, the final decision should be elevated to the National Security Advisor and the Secretaries of Defense, State, Commerce, and Energy.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “BIS should provide specific congressional committees with data from the Automated Export System on a quarterly basis.”** “Additionally, to improve congressional oversight of BIS’s license adjudication process, BIS should provide specific congressional committees with data from the Automated Export System on a quarterly basis. Electronic files should contain U.S. exporter by name; product description (e.g., harmonized system code and ECCN/U. S. Munitions List designation); end user and destination country; and when a license was required, whether the license was granted or denied. BIS currently denies just 1.2 percent of export licenses. These data reporting requirements can help Congress better determine whether BIS is adequately protecting national security through appropriate use of export controls or whether additional direction from Congress is required.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “BIS must deny export licenses to countries that do not permit adequate end-use checks (e.g., China/Russia) by U.S. authorities.”** “The integrity of the export control system may be validated only through adequate end-use checks. BIS must deny export licenses to countries that do not permit adequate end-use checks (e.g., China/Russia) by U.S. authorities. BIS should also strengthen the forensic audit capabilities of its Export Enforcement officers through improved and frequent training so they are able to detect export-control violations.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The U.S. Government needs a new export control modernization effort to tighten the EAR policies governing licenses to countries of concern, including China and Russia.”** “The U.S. Government needs a new export control modernization effort to tighten the EAR policies governing licenses to countries of concern, including China and Russia (specifically, revise and/or reverse the 2008 through 2016 policies).” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended redesignating China and Russia to a more highly prohibitive export licensing group.** “Redesignating China and Russia to more highly prohibitive export licensing groups (country groups D or E).” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the reduction of the de minimis threshold to 10% or 0% for critical technologies.** “Reducing the de minimis threshold from 25 percent to 10 percent—or 0 percent for critical technologies.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Tightening the definition of ‘fundamental research’ to address exploitation of the open U.S. university system by authoritarian governments through funding, students and researchers, and recruitment.”** [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended adding more entities from Russia and China to the BIS Entity List and apply license review “policy of denial” prohibiting exports to these entities.** “Entity List and Sanctions. There are currently just over 500 Chinese and over 500 Russian companies on the

Department of Commerce’s Entity List, which regulates exports of controlled and uncontrolled items to designated entities. Given China’s Civil–Military Fusion Strategy and Russia’s massive war efforts facilitated by a broad range of the Russian economy, BIS must add more entities to the Entity List and apply a license review ‘policy of denial’ that prohibits exports to these entities. Entity List parties that violate export controls should be placed on the BIS Denied Persons List (and thereby lose export privileges) and, if the violations are significant enough, they should also be sanctioned by the Department of Treasury.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**BIS should designate app providers WeChat and ByteDance/TikTok to the Entity List, which would prevent users from program updates, which would eventually make the app non-operational in the U.S.** “BIS should additionally designate app providers (such as WeChat and ByteDance/TikTok) known for undermining U.S. national security through data collection, surveillance, and influence operations, to the Entity List. This listing would prevent app users from program updates, which would quickly make these apps non-operational in the United States.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

### Minority Business Development Agency

**The Trump administration proposed eliminating funding for MBDA.** “MBDA has the appearance, on its face, of perpetuating racial bias by focusing on minority advancement rather than economic need or other criteria. This is why the Trump Administration proposed eliminating funding for the agency in 2017. Many conservatives ask why the government is funding this activity, which often amounts to business and management consulting services offered by private sector entities. Eventually, the Trump Administration changed course and proposed that MBDA continue to exist as a permanently authorized entity focused on policy rather than offering services. Despite this change, many conservatives understandably see MBDA as problematic on a philosophical level.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

### National Institute of Standards and Technology

**Project 2025 proposed the full privatization of the Hollings Manufacturing Extension Partnership.** “Privatize the Hollings Manufacturing Extension Partnership. The Hollings Manufacturing Extension Partnership (MEP) establishes and manages a network of centers focused on advising small- and medium-sized manufacturers in order to improve processes and thereby strengthen the U.S. industrial base. When Congress created the program, MEP centers were intended to transition to self-sustaining private institutions after using government funds to begin operations, but the prohibition on long-term funding was abolished in 1998. MEP’s business advisory services would be more properly carried out by the private sector. The next Administration should propose legislation to zero out this \$150 million program and fully privatize existing MEP centers.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the Baldrige Performance Excellence Program be transferred to the private sector.** “Transfer the Baldrige Performance Excellence Program. This program’s ‘process’ assists companies in improving management and operations, a function more properly and effectively carried out by the private sector. This program operates at a cost to taxpayers, despite thousands of dollars in fees charged to each participating company or entity and long-term plans to make the program self-sufficient. Maintenance and operation of the program should be entirely handed over to the Baldrige Award Foundation to be run by non-government staff via fees.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

### National Telecommunications and Information Administration

**Project 2025 recommended the NTIA held big tech accountable by providing “policy solutions to address big tech’s censorship of speech.”** “Support free speech and hold big tech accountable. Immediately conduct a thorough review of federal policy regarding free speech online and provide policy

solutions to address big tech’s censorship of speech.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 supported implementing the Trump administration’s Information and Communications Technology Services Executive Order.** “Utilize new tools to eliminate threats to national security. Fully implement the Trump Administration’s Information and Communications Technology and Services (ICTS) Executive Order authorities in a way that ensures long-term success and the legal viability of this new national security tool.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 supported the expansion of temporary leasing of government allocated spectrum.** “Expand utilization of federal spectrum. Begin short term, temporary leasing of government allocated spectrum to ensure optimum utilization while preserving federal agency use rights.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 wanted to support the commercial space industry by pushing the FCC to make decisions “that continue to enable U.S. dominance in the commercial space industry.”** “Support the commercial space industry. Advocate for licensing decisions at the Federal Communications Commission that continue to enable U.S. dominance in the commercial space industry.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

**Project 2025 pushed for a reevaluation of FirstNet “in view of modern technologies that will render it obsolete.”** “Review FirstNet. Evaluate the performance and long-term value proposition of FirstNet in view of modern technologies that will render it obsolete.” [Department of Commerce, Project 2025, accessed [6/24/24](#)]

## Treasury

### Top Lines

#### Tax Reform

- ✓ Repeal the Inflation Reduction Act, making life more expensive for Americans and cutting good, new jobs
- ✓ Implement a regressive tax code that would increase taxes for low- and middle-income Americans while reducing taxes for wealthy Americans
- ✓ Cut corporate taxes to 18% and re-establish conditions for off-shore corporate tax havens
- ✓ Would eliminate the Federal Reserve’s dual mandate and mission of full employment
- ✓ Would fuel dynastic wealth with capped and reduced estate taxes
- ✓ Would end SALT deductions for home-owners, directly targeting blue states and cities where property taxes tend to be higher
- ✓ Eliminate clean energy tax credits and incentives
- ✓ Push for a flat consumption tax, and for a flat tax on income but excluding investment

#### IRS

- ✓ Staff the IRS with political appointees who are **not** subject to Senate approval in order to avoid transparency and accountability for administration allies
- ✓ Reduce the IRS
- ✓ Eliminate clean energy tax credits and incentives
- ✓ Push for a flat consumption tax, and for a flat tax on income but excluding investment

#### OECD & International Affairs

- ✓ End its financial support for the Organization for Economic Cooperation and Development
- ✓ Withdraw from the World Bank and IMF and end its financial contribution to both.

#### Financial Regulation

- ✓ Privatize Fannie Mae and Freddie Mac, exposing borrowers and the housing market to predatory lenders and schemes
- ✓ Push Congress to repeal the Corporate Transparency Act and for FinCEN to withdraw its beneficial ownership rule, making it easier for bad actors to launder money
- ✓ Limit employers' ability to deduct the cost of worker benefits, such as health coverage. It would also deny deductions for employer-paid health coverage of employee's dependents aged 23 or older.

#### DEI

- ✓ Project 2025 calls for the elimination of the office for Diversity, Equity, Inclusion and Accessibility as well as the Counselor for Racial Equity, and the Advisory Committee on Racial Equity within the Treasury Department, and the eradication of any DEI practices at Treasury.

Project 2025 proposes regressive tax rates that cost ordinary working Americans more and billionaires and corporations less, all while repealing the Inflation Reduction Act and its associating investments, tax incentives, and credits that aid America's clean energy transition. Project 2025 proposes loopholes for wealthy individuals and corporations to accrue more wealth, to shield their assets from taxation in off-shore low-tax havens, and to close the door behind them by establishing a new  $\frac{3}{5}$  voting threshold for Congress to increase corporate tax rates.

Project 2025 offers corporations and bad actors relaxed regulatory and enforcement conditions by calling for Congress to repeal the Corporate Transparency Act, making money laundering easier.

### Tax Reform

**Project 2025 pushed for the enactment of a two-rate individual tax system of 15% and 30% that eliminates most deductions, credits, and exclusions.** "The Treasury should work with Congress to simplify the tax code by enacting a simple two-rate individual tax system of 15 percent and 30 percent that eliminates most deductions, credits and exclusions." [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 would have the 30% tax bracket start at or close to the Social Security wage base to ensure combined income and payroll tax structure acts close to a flat tax on wage income beyond the standard deduction.** "The 30 percent bracket should begin at or near the Social Security wage base to ensure the combined income and payroll tax structure acts as a nearly flat tax on wage income beyond the standard deduction." [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 would have the corporate income tax rate be cut to 18%.** "The corporate income tax rate should be reduced to 18 percent. The corporate income tax is the most damaging tax in the U.S. tax system, and its primary economic burden falls on workers because capital is more mobile than labor.<sup>17</sup>" [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: "Capital gains and qualified dividends should be taxed at 15 percent."** "Capital gains and qualified dividends should be taxed at 15 percent. Thus, the combined corporate income tax combined with the capital gains or qualified dividends tax rate would be roughly equal to the top individual income tax rate.<sup>18</sup>" [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: "The system should allow immediate expensing for capital expenditures and index capital gains taxes for inflation."** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the next administration to repeal all tax increases that were passed as part of the Inflation Reduction Act, including the book minimum tax, stock buyback excise tax, the coal excise tax, Superfund tax, excise taxes on drug manufacturers to compel them to comply with Medicare price controls.** "In addition, intermediate tax reform should repeal all tax increases that were passed as part of the Inflation Reduction Act,<sup>19</sup> including the book minimum tax, the stock buyback

excise tax, the coal excise tax, the reinstated Superfund tax, and excise taxes on drug manufacturers to compel them to comply with Medicare price controls.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**The next administration should push for legislation to fully repeal subsidies in the tax code, including dozens of tax credits and breaks for green companies in Subtitle D of the IRA.** “The next Administration should also push for legislation to fully repeal recently passed subsidies in the tax code, including the dozens of credits and tax breaks for green energy companies in Subtitle D of the Inflation Reduction Act.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

· **CAP: Consequences of repealing clean energy tax credits**

- Lost jobs: Largely through tax incentives, the IRA has created over [170,000 new jobs](#) in clean energy. Most if not all of these would be lost if the IRA tax credits were repealed. Not only would this devastated working communities but it would also send a catastrophic market signal to investors.
- Lost competitiveness: Repealing IRA tax credits for advanced clean energy technologies would gut America’s ability to compete with China in developing the technologies of the future. It would also cede global leadership on climate to other nations.
  - Lost emissions reductions: The IRA is projected to reduce US emissions by [43-48%](#) below 2005 levels by 2035. IRA tax incentives for clean energy are a core component of this transition. Reducing emissions will lead to fewer heat waves, wildfires, and other extreme weather events. Failing to reduce emissions will mean that these phenomena will continue to worsen.

**Project 2025: The estate and gift tax should be reduced to no higher than 20%.** “The estate and gift tax should be reduced to no higher than 20 percent, and the 2017 tax bill’s temporary increase in the exemption amount from \$5.5 million to \$12.9 million (adjusted for inflation) should be made permanent.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: The Trump tax bill’s temporary increase in the exemption amount from \$5.5 million to \$12.9 million should be made permanent.** “The estate and gift tax should be reduced to no higher than 20 percent, and the 2017 tax bill’s temporary increase in the exemption amount from \$5.5 million to \$12.9 million (adjusted for inflation) should be made permanent.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: The tax on global intangible low-taxed income should be reduced to no higher than 12.5% with the 20% haircut on related foreign tax credits eliminated or reduced.** “The tax on global intangible low-taxed income should be reduced to no higher than 12.5 percent, with the 20 percent haircut on related foreign tax credits reduced or eliminated.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: “All non-business tax deductions and exemptions that were temporarily suspended by the 2017 tax bill should be permanently repealed, including the bicycle commuting expense exclusion, non-military moving expense deductions, and the miscellaneous itemized deductions.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the full repeal of the SALT tax deduction.** “The individual state and local tax deduction, which was temporarily capped at \$10,000, should be fully repealed.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Deductions related to educational expenses should be repealed.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Special business tax preferences, such as a special deduction for energy-efficient commercial building properties, should be eliminated.”** [Department of the Treasury, Project 2025,

accessed [6/24/24](#)]

**Project 2025 advocated for a kind of consumption tax, and floated a national sales tax, a business transfer tax, a Hall-Rabushka flat tax, or a cash flow tax.** “The public finance literature is clear that a consumption tax would minimize government’s distortion of private economic decisions and thus be the least economically harmful way to raise federal tax revenues.<sup>28</sup> There are several forms that a consumption tax could take, including a national sales tax, a business transfer tax, a Hall–Rabushka flat tax,<sup>29</sup> or a cash flow tax.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 supported passing legislation that would require a 3/5ths vote in the U.S. House and Senate to raise income or corporate tax rates.** “Treasury should support legislation instituting a three-fifths vote threshold in the U.S. House and the Senate to raise income or corporate tax rates to create a wall of protection for the new rate structure. Many states have implemented such a supermajority vote requirement.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 does not support the global minimum corporate tax.** “Tax competition between states and countries is a positive force for liberty and limited government.<sup>31</sup> The Biden Administration, under the direction of Treasury Secretary Janet Yellen, has pushed for a global minimum corporate tax that would increase taxation and the size of government in the U.S. and around the world. This attempt to ‘harmonize’ global tax rates is an attempt to create a global tax cartel to quash tax competition and to increase the tax burden globally. The U.S. should not outsource its tax policy to international organizations.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

- CAP: Consequences of Project 2025’s conservative tax proposals
  - Slash and flatten personal income tax rates, disproportionately benefiting the wealthy, while eliminating credits, deductions, and exclusions.
  - Cut the tax rate on capital gains and dividends paid by the wealthiest investors.
  - Cut the corporate tax rate from 21 percent to 15 percent. Prior to the 2017 Trump tax cuts, the rate was 35 percent. Recent [research](#) has documented that the benefits of the 2017 did not “trickle down” to workers and the overall failure of the law’s corporate provisions to deliver on its promises.
  - Undermine efforts to establish a global minimum tax as specified in the OECD’s “two pillar” framework and repeal the minimal efforts aimed at discouraging offshoring contained in the 2017 tax cuts. It would also end U.S. participation in the OECD.
  - Repeal the corporate minimum tax imposed by the IRA that is designed to ensure that the largest, most profitable corporations pay at least some amount of tax. It would also repeal the stock buyback tax.
  - Limit employers’ ability to deduct the cost of worker benefits, such as health coverage. It would also deny deductions for employer-paid health coverage of employee’s dependents aged 23 or older.
  - Gut efforts to ensure that the wealthy and large corporations pay the taxes that they owe by rescinding the funding provided by the IRA. It would also reduce the amount of income subject to reporting (see this recent CAP publication for why [this](#) is important), which would likely result in skyrocketing illegal tax avoidance.
  - Establish a goal of shifting the nation’s tax code from one based on income to one based on consumption. As [CAP wrote](#) earlier this year, this type of tax would dramatically shift the cost of government from the wealthy to low- and middle-income households.
  - Institute a supermajority vote requirement for federal tax increases - tax increases would require the approval of 60 percent of each house of Congress.
  - “Expose and eradicate” recent Treasury Department racial equity initiatives.
  - Repeal the Corporate Transparency Act, which aims to stem money laundering and other illicit activities.

## Universal Savings Accounts



**Project 2025: “All taxpayers should be allowed to contribute up to \$15,000 (adjusted for inflation) of post-tax earnings into Universal Savings Accounts (USAs).”** “All taxpayers should be allowed to contribute up to \$15,000 (adjusted for inflation) of post-tax earnings into Universal Savings Accounts (USAs). The tax treatment of these accounts would be comparable to Roth IRAs. USAs should be highly flexible to allow Americans to save and invest as they see fit, including, for example, investments in a closely held business. Gains from investments in USAs would be non-taxable and could be withdrawn at any time for any purpose. This would allow the vast majority of American families to save and invest without facing a punitive double layer of taxation.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

## Businesses

**Project 2025 urged for the business loan limitation to be increased to at least \$500,000 and said businesses should be allowed to fully carry forward net operating losses.** “To encourage entrepreneurship, the business loss limitation should be increased to at least \$500,000. Businesses should also be allowed to fully carry forward net operating losses. Extra layers of taxes on investment and capital should also be eliminated or reduced.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Extra layers of taxes on investment and capital should also be eliminated or reduced.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The net investment income surtax and the base erosion anti-abuse tax should be eliminated.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

- **Project 2025: The next administration should set a cap of no more than \$12,000 annually on untaxed benefits that employers can claim as deductions.** “To reduce this tax bias against wages (as opposed to employee benefits), the next Administration should set a meaningful cap (no higher than \$12,000 per year per full-time equivalent employee—and preferably lower) on untaxed benefits that employers can claim as deductions. Employee benefit expenses other than tax-deferred retirement account contributions should count toward the limitation, whether offered to specific employees or whether the costs relate to a shared benefit like building gym facilities for employees.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]
- **Project 2025: “Only a percentage of Health Savings Accounts (HSA) contributions (which are not taxed upon withdrawal) should count toward the limitation.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]
- **Project 2025: “The limitation on benefit deductions should not be indexed to increase with inflation.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]
- **Project 2025: “Employers should also be denied deductions for health insurance and other benefits provided to employee dependents if the dependents are aged 23 or older.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

## IRS

**Project 2025 opposed the measure that requires banks to file a revised Form 1099-K if they receive more than \$600.** “The Biden Administration has also sought to make the tax system’s administrative burden much worse in other ways. For example, it has proposed creating a comprehensive financial account information reporting regime that would apply to all business and personal accounts with more than \$600. Banks would be required to collect the taxpayer identification numbers of and file a revised Form 1099-K for all affected payees, as well as provide additional information.<sup>35</sup> This massive increase in the scope and breadth of information reporting should be unequivocally opposed.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants to increase the number of presidential appointees at the IRS that are not subject to Senate confirmation.** “For the IRS to change and become more accountable, more transparent, and better managed, there is a need to increase the number of Presidential appointments subject to Senate confirmation, and not subject to Senate confirmation, at the IRS. At the very least, Congress should ensure that the Deputy Commissioner for Services and Enforcement, the Deputy Commissioner for Operations Support, the National Taxpayer Advocate, the Commissioner of the Wage and Investment Division, the Commissioner of the Large Business and International Division, the Commissioner of the Small Business Self-Employed Division, and the Commissioner of the Tax Exempt and Government Entities Division are presidential appointees.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the operating budget of the IRS to be constant, adjusted for inflation. They also want the Office of the Taxpayer Advocate budget to be increased by at least 20% and for the DEI office in the IRS to be closed.** “The operating budget of the IRS should be held constant in real terms. The resources allocated to the Office of the Taxpayer Advocate should be increased by at least 20 percent (about \$44 million). The Office of Equity, Diversity, and Inclusion should be closed. Provided that IT management is changed; an effective, well-considered implementation plan is adopted; and serious oversight is put in place, additional resources dedicated solely to IT modernization may be warranted.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

#### **Organization for Economic Cooperation and Development**

**Project 2025: The U.S. should end its financial support for the Organization for Economic Cooperation and Development.** “The Organization for Economic Co-operation and Development (OECD), in conjunction with the European Union, has long tried to end financial privacy and impose regulations on countries with low (or no) income taxes. In fact, on tax, environmental, corporate governance and employment issues, the OECD has become little more than a taxpayer-funded left-wing think tank and lobbying organization.<sup>32</sup> The United States provides about one-fifth of OECD’s funding.<sup>33</sup> The U.S. should end its financial support and withdraw from the OECD.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

#### **International Affairs**

**Project 2025 recommended that Treasury withdraw from Senate consideration the Protocol Amending the Convention on Mutual Administrative Assistance in Tax Matters, which they claim would lead to more transnational issues.** “The Treasury Department should withdraw from Senate consideration the Protocol Amending the Convention on Mutual Administrative Assistance in Tax Matters.<sup>48</sup> The protocol will lead to substantially more transnational identity theft, crime, industrial espionage, financial fraud, and suppression of political opponents and religious or ethnic minorities by authoritarian and corrupt governments, including China, Colombia, Nigeria, and Russia.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the next administration to oppose the multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information.** “The new Administration should also oppose the multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposed that the U.S. withdraw from the World Bank and IMF and end its financial contribution to both.** “International organizations such as the OECD, the World Bank, and the International Monetary Fund espouse economic theories and policies that are inimical to American free market and limited government principles. The global elites who operate the IMF regularly advance higher taxes and big centralized government. The IMF has intervened in American policy debates—and has even recommended that the U.S. raise taxes. The IMF’s record of advancing global financial stability has been mixed at best. Its development assistance and lending programs in thirdworld countries have more

often than not retarded growth rather than advancing it. The Treasury Department plays an important role in these international institutions and should force reforms and new policies. The U.S., however, should withdraw from both the World Bank and the IMF and terminate its financial contribution to both institutions.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

### **Committee on Foreign Investment in the United States**

**Project 2025 wanted CFIUS to develop a mitigation monitoring program, and said it should petition Congress to amend the law to cover Chinese greenfield investments.** “Given these issues, the next steps for CFIUS should be to develop a more coherent—and transparent—mitigation monitoring program to complement the enforcement guidelines, give CFIUS agencies in charge of national security concerns an equal voice at the table, and petition Congress to amend the law to cover Chinese greenfield investments.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended that CFIUS publish a penalty schedule for violations of CFIUS reporting and mitigation requirements.** “CFIUS should publish a penalty schedule for violations of CFIUS reporting and mitigation requirements. Publishing a penalty schedule for CFIUS violations will reduce the discretion of the committee to waive penalties or impose mere ‘wrist slap’ costs on violators of the law. Additionally, a standardized penalty schedule would likely increase the deterrence of CFIUS enforcement by reducing the perception among parties to covered transactions that they can avoid enforcement by the committee or secure special exceptions based on appeals to the committee’s discretion.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on Congress to close the greenfield investments loophole and require CFIUS to review investments in American greenfield assets by Chinese-controlled entities.** “Congress should close the loophole on greenfield investments and require CFIUS review of investments in U.S.-based greenfield assets by Chinese-controlled entities to assess any potential harm to U.S. national and economic security. In the 2018 Foreign Risk and Review Modernization Act (FIRREA),<sup>51</sup> one important category of foreign transactions left out of the bill was greenfield investments, particularly by Chinese state-owned enterprises (SOEs). Greenfield investments by Chinese SOEs pose a unique threat, and they should be met with the highest scrutiny by all levels of government.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

### **Dodd-Frank Act**

**Project 2025: “Congress should repeal Title I, Title II, and Title VIII of the Dodd–Frank Act.”** “Congress should repeal Title I, Title II, and Title VIII of the Dodd–Frank Act.<sup>52</sup> Title I of Dodd–Frank created the Financial Stability Oversight Council, a kind of super-regulator tasked with identifying so-called systemically important financial institutions and singling them out for especially stringent regulation. The problem, of course, is that this process effectively identifies those firms regulators believe are ‘too big to fail.’” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

### **Fannie Mae and Freddie Mac**

**Project 2025 recommended that Fannie Mae and Freddie Mac “move toward privatization.”** “Treasury plays a role in funding the conservatorships of Fannie Mae and Freddie Mac. It should work to end the conservatorships and move toward privatization of these massive housing finance agencies. This would restore a sustainable housing finance market with a robust private mortgage market that does not rely on explicit or implicit taxpayer guarantees.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Fannie Mae and Freddie Mac (both GSEs) must be wound down in an orderly manner.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Treasury plays a role in funding the conservatorships of Fannie Mae and Freddie Mac. It should work to end the conservatorships and move toward privatization of these massive housing finance agencies.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The Common Securitization Platform should be privatized and broadly available.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

## Financial Regulation

**Project 2025 recommended the next administration support the merging of the Office of the Comptroller of the Currency, FDIC, the National Credit Union Administration, and the Federal Reserve’s non-monetary supervisory and regulatory functions.** “The new Administration should establish a more streamlined bank and supervision by supporting legislation to merge the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, the National Credit Union Administration, and the Federal Reserve’s non-monetary supervisory and regulatory functions.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on Congress to repeal the Corporate Transparency Act and for FinCEN to withdraw its beneficial ownership rule.** “Congress should repeal the Corporate Transparency Act, and FinCEN should withdraw its poorly written and overbroad beneficial ownership reporting rule. Both are targeted at the smallest businesses in the U.S. (those with 20 or fewer employees) and will do nothing material to impede criminal finance.<sup>68</sup> The FinCEN beneficial ownership reporting rule will impose costs exceeding \$1 billion annually and is exceedingly poorly drafted.<sup>69</sup> FinCEN itself estimates that more than 33 million businesses will be affected and that costs will be \$547 million to \$8.1 billion annually.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

## DEI

**Project 2025 called for the elimination of the office for Diversity, Equity, Inclusion and Accessibility as well as the Counselor for Racial Equity, and the Advisory Committee on Racial Equity within the Treasury Department.** “Under the Biden Administration, the Treasury Department has appointed a Counselor for Racial Equity, established an Advisory Committee on Racial Equity, and created an office for Diversity, Equity, Inclusion, and Accessibility. All these should be eliminated. Treasury has created several new offices to promote ‘equity’ and has made this its first of five strategic goals in its Fiscal Year 2022–2026 Strategic Plan. ‘Equity’ is identified as a cross-cutting theme in 15 of 19 of the plan’s objectives.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The next conservative Administration should take affirmative steps to expose and eradicate the practice of critical race theory and diversity, equity, and inclusion (DEI) throughout the Treasury Department.”** “The avowed purpose of these initiatives is to implement policies that deliberately favor some races or ethnicities over others. The casual acceptance and rapid spread of racist policymaking in the federal government must be forcefully opposed and reversed. The next conservative Administration should take affirmative steps to expose and eradicate the practice of critical race theory and diversity, equity, and inclusion (DEI) throughout the Treasury Department.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 wanted specific actions taken to eliminate DEI from the Treasury Department.** “These steps will include: I Identify every Treasury official who participated in DEI initiatives and interview him or her for the purpose of determining the scope and nature of these initiatives and to ensure that such initiatives are completely ended. I Make public immediately all communications relating to the work of the Treasury’s critical race theory and DEI initiatives. I Treat the participation in any critical race theory or DEI initiative, without objecting on constitutional or moral grounds, as per se grounds for termination of employment. I Expose and make public all training materials and initiatives designed to single out any race, ethnicity, or sex for special treatment.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025: “The Administration should eliminate the 25-member Treasury Advisory Committee on Racial Equity.”** [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

## Climate

**Project 2025: “The next Administration should eliminate the Climate Hub Office and withdraw from climate change agreements that are inimical to the prosperity of the United States.”** “Treasury has created a new departmental office, ‘Climate Hub,’ and has made ‘combating climate change’ one of the Biden Treasury Department’s top five principal goals. The next Administration should eliminate the Climate Hub Office and withdraw from climate change agreements that are inimical to the prosperity of the United States. The Climate Hub office ‘coordinates Treasury’s work to inform, guide, incentivize, and mobilize financial flows for climate mitigation and climate adaptation and supports the broader alignment of the financial system with a path to net-zero emissions by mid-century.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on the next administration to promote investment in domestic energy, including in oil and gas.** “The next Administration should use Treasury’s tools and authority to promote investment in domestic energy, including oil and gas. It should reverse support for international public- (and private-) based efforts promoting Environmental, Social, and Governance<sup>75</sup> and Principles for Responsible Investment,<sup>76</sup> both of which have badly damaged U.S. energy security.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

## Trade

**Project 2025: “Congress should eliminate the U.S. Trade and Development Agency.”** “Congress should eliminate the U.S. Trade and Development Agency (USTDA). The USTDA is intended to help companies create U.S. jobs through the export of U.S. goods and services for priority development projects in emerging economies. The USTDA links U.S. businesses to export opportunities by funding project planning activities, pilot projects, and reverse-trade missions while creating sustainable infrastructure and economic growth in partner countries. These activities more properly belong to the private sector. The best way to promote trade and development is to reduce tariff and non-tariff trade barriers. Another way is to reduce the federal budget deficit, and thereby federal borrowing from abroad, freeing more foreign dollars to be spent on U.S. exports instead of federal treasury bonds.” [Department of the Treasury, Project 2025, accessed [6/24/24](#)]

# Financial Regulation

## Top Lines

### Federal Reserve

- ✓ Limit the Federal Reserve’s independence and autonomy in managing key economic indicators and handling financial crises
- ✓ Would move to a free banking system “where the Federal Reserve is effectively abolished”
- ✓ Would eliminate the Federal Reserve’s dual mandate and mission of full employment
- ✓ Move to a gold standard, as in the 1800s Suffolk System
- ✓ Limit or eliminate the Federal Reserve’s ability to intervene in financial crises by limiting its lender of last resort function
- ✓ Wind-down the Federal Reserve’s balance sheet to prevent the Federal Reserve from stabilizing potential market risks

### SEC, CFTC, and CFPB

- ✓ Substantially weaken or eliminate restrictions on companies selling shares to the public without making any reliable disclosures.
- ✓ Seeks to abolish the Consumer Financial Protection Bureau and reverse Dodd-Frank Section 1061 that created it, returning the consumer protection functions to the various agencies that handled them before the Global Financial Crisis.
- ✓ Deregulate cryptocurrency, exposing consumers to serious financial risk

Project 2025 proposes drastic, destabilizing changes to America's financial regulatory functions that protect our markets and our consumers from shocks, volatility, and spiraling financial crises. Project 2025's plans, if implemented, would eliminate at worst, and compromise at best, the Federal Reserve's independence, hamstringing the Federal Reserve's ability to set and maintain interest rates and to lend in the face of acute or widespread market vulnerabilities. Project 2025 pairs the stripping of the Federal Reserve's autonomy with a complete rollback on consumer financial protection regulation and a push to privatize Fannie Mae and Freddie Mac, setting the stage for the kind of mortgage-backed security crisis Americans suffered through in 2008-2009. A Project 2025 Administration will favor predatory actors looking to take advantage of consumers across cryptocurrency, lending, and stock markets.

## Federal Reserve

**Project 2025 proposes to eliminate the Fed's dual mandate and mission of full employment.** "The dual mandate may inadvertently contribute to recessions rather than fixing them...It is also worth noting that the problem of the dual mandate may worsen with new pressure on the Federal Reserve to include environmental or redistributionist "equity" goals in its policymaking, which will likely enable additional federal spending." [Federal Reserve, Project 2025 accessed [6/24/24](#)]

**Project 2025 proposes moving to a Free Banking System, effectively abolishing the Federal Reserve.** "The Federal Reserve is effectively abolished, and the Department of the Treasury largely limits itself to handling the government's money." [Federal Reserve, Project 2025 accessed [6/24/24](#)]

**Project 2025 proposes moving to a gold standard.** "Given this track record, restoring a gold standard retains some appeal among monetary reformers who do not wish to go so far as abolishing the Federal Reserve. Both the 2012 and 2016 GOP platforms urged the establishment of a commission to consider the feasibility of a return to the gold standard, and in October 2022, Representative Alexander Mooney (R-WV) introduced a bill to restore the gold standard." [Federal Reserve, Project 2025 accessed [6/24/24](#)]

**Project 2025 proposes limiting the Federal Reserve's lending capacities.** "Curb the Fed's excessive last-resort lending practices. These practices are directly responsible for "too big to fail" and the institutionalization of moral hazard in our financial system." [Federal Reserve, Project 2025 accessed [6/24/24](#)]

**Project 2025 proposes limiting the Federal Reserve's independence.** "In essence, because of its vastly expanded discretionary powers with respect to monetary and regulatory policy, the Fed lacks both operational effectiveness and political independence. To protect the Federal Reserve's independence and to improve monetary policy outcomes, Congress should limit its mandate to the sole objective of stable money." [Federal Reserve, Project 2025 accessed [6/24/24](#)]

**Project 2025: "Appoint a commission to explore the mission of the Federal Reserve, alternatives to the Federal Reserve system, and the nation's financial regulatory apparatus."** [Federal Reserve, Project 2025 accessed [6/24/24](#)]

## SEC, CFTC and CFPB

**Project 2025 called the CFPB "unconstitutional" and argued for Congress to abolish it.** "The CFPB is a highly politicized, damaging, and utterly unaccountable federal agency. It is unconstitutional.

Congress should abolish the CFPB and reverse Dodd–Frank Section 1061, thus returning the consumer protection function of the CFPB to banking regulators and the Federal Trade Commission.” [Financial Regulatory Agencies, Project 2025, accessed [6/24/24](#)]

### **CAP Analysis on Project 2025 and the SEC, CFTC, and CFPB**

#### **Substantially weaken or eliminate restrictions on companies selling shares to the public without making any reliable disclosures.**

CAP released a [report](#) this year about the extensive harms to investors and the public of the growing exemptions from the public company reporting framework.

##### *Consequences:*

- These changes would greatly reduce the number of disclosures that companies make to investors.
- Capital would be more likely to remain invested in fossil fuel assets and much less likely to flow to renewable energy because investors (and the public) would lack information about which companies are high emission.
- Financial institutions would continue to provide loans to and invest in fossil fuel and other high emission industries.

#### **The section on the CFTC would take a very pro-cryptocurrency approach by recommending changes that would essentially provide a separate, light regulatory regime for crypto.**

##### *Consequences:*

- The scams, money laundering, and financing of Russia and terrorism that have already been occurring through the use of anonymous crypto transactions will get much worse.
- Americans who invest in crypto will be harmed and could lose their life savings if they invest them in crypto assets, just like when FTX collapsed.

#### **Supports the reasoning of the 5th Circuit, which said the CFPB’s funding was unconstitutional.**

SCOTUS will hear oral arguments on October 3 of this year. CAP is planning an event on September 28 specifically about this case and the extensive consumer protection statutes overseen by the agency and the many rules promulgated since the agency was established in 2012—all of which protect consumers from scams, abusive fees, and unfair financial practices of financial institutions.

#### **Seeks to abolish the CFPB and reverse Dodd-Frank Section 1061 that created it, returning the consumer protection functions to the various agencies that handled them pre-CFTC.**

##### *Consequences:*

- If the CFPB is abolished, or even if the 5th Circuit decision is affirmed by the US Supreme Court, there will be chaos in consumer financial markets due to uncertainty about the agency’s ability to continue enforcing the law and the validity of the many rules and regulations it has already passed since it began operating a decade ago.
- Depending on the rationale of the Court in affirming the 5th Circuit, it’s possible that the funding and functioning of several other financial regulatory agencies, such as the Fed, the FDIC and the OCC, will be threatened—with corresponding instability in the financial system. Chaos in the financial system will delay climate action in myriad ways.

## **Housing and Urban Development**

### **Toplines**

- ✓ Reverses Biden-era regulations on fair housing
- ✓ Increases mortgage insurance premiums on all products above 20-year terms
- ✓ Restricts eligibility for first-time homebuyer programs

- ✓ Repeals the Affirmatively Furthering Fair Housing regulation
- ✓ Ends the Biden Administrations Property Appraisal and Valuation Equity (PAVE) program
- ✓ Prohibits noncitizens from living in federally assisted housing

**Project 2025 floated “devolving many HUD functions to states and localities with any remaining federal functions consolidated to other federal agencies.”** “Finally, and more fundamentally, Congress could consider a wholesale overhaul of HUD that contemplates devolving many HUD functions to states and localities with any remaining federal functions consolidated to other federal agencies (for example, by transferring loan guarantee programs to SBA; moving Indian housing programs to the Department of the Interior; moving rental assistance, mortgage insurance programs, and GNMA to a redesignated Housing and Home Finance Agency). Generally, this reform path could consolidate some programs, eliminate others that have failed to produce meaningful long-run results, and narrow the scope of many programs so that they are closer to what they were when they were created.” [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the next conservative administration to “reset HUD” and reverse the Biden administration’s “corrosive progressive ideologies.”** “A new conservative Administration will therefore need to: I Reset HUD. This effort should specifically include a broad reversal of the Biden Administration’s persistent implementation of corrosive progressive ideologies across the department’s programs.” [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

## Personnel

**Project 2025 called on HUD to politicize the department by “immediately” appointing political appointees to various leadership positions.** “HUD political leadership should immediately assign all delegated powers to politically appointed PDAS, DAS, and other office leadership positions; change any current career leadership positions into political and non-career appointment positions; and use Senior Executive Service (SES) transfers to install motivated and aligned leadership.” [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

## Real Estate

**Project 2025 called on the Federal Housing Administration to increase the mortgage insurance premium on all products above 20-year terms and maintain MIP for all below 20-year terms and refinances.** “FHA leadership should increase the mortgage insurance premium (MIP) for all products above 20-year terms and maintain MIP for all products below 20-year terms and all refinances. FHA should encourage wealth-building homeownership opportunities, which can be accomplished best through shorter-duration mortgages.<sup>39</sup> Ideally, Congress would contemplate a fundamental revision of FHA’s statutory restriction of single-family housing mortgage insurance to first-time homebuyers.” [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

- **Bankrate: “An FHA mortgage insurance premium (MIP) is an additional fee you pay to protect the lender in case you default on your FHA loan.”** [Bankrate, [11/8/23](#)]
- **FHA borrowers have to pay two MIPs, one upfront and another annually for as long as they repay the loan.** “FHA borrowers must pay two mortgage insurance premiums: one upfront at closing and another annually for as long as they repay the loan, in most cases. You will pay each premium a little differently.” [Bankrate, [11/8/23](#)]
- **FHA mortgage borrowers paid 1.75% of their loan amount in upfront mortgage insurance costs and also paid an annual premium of 0.85%.** “FHA mortgages have long provided first-time homebuyers and those with less-than-stellar credit an affordable way to achieve homeownership. But one of the main drawbacks of these mortgages has been that their mortgage insurance costs are relatively high. FHA mortgage borrowers will pay 1.75% of their loan amount in upfront mortgage insurance costs, and they typically also pay an 0.85% annual



premium, which is added to their monthly mortgage payment. But in March, FHA borrowers will be able to take advantage of lower annual mortgage insurance rates.” [Business Insider, [2/23/23](#)]

- **The Biden administration announced that FHA’s annual mortgage insurance premium was being cut to 0.55% for most new borrowers, saving an estimated 850k homebuyers an average of \$800 annually.** “Today, the Biden-Harris Administration announced an action that will save homebuyers and homeowners with new FHA-insured mortgages an average of \$800 per year, lowering housing costs for an estimated 850,000 homebuyers and homeowners in 2023. Vice President Harris and Department of Housing and Urban Development (HUD) Secretary Fudge will travel to Bowie, Maryland, today to announce that HUD, through the Federal Housing Administration (FHA), will reduce its annual mortgage insurance premium by 0.30 percentage points, from 0.85% to 0.55% for most new borrowers. The mortgage insurance premium is the monthly fee that homeowners with FHA-insured mortgages pay to insure their mortgages, which they pay on top of their monthly principal and interest payments.” [Fact Sheet, White House, [2/22/23](#)]
- **Over 80% of FHA borrowers are first-time homebuyers and over 25% are homebuyers of color.** “More than 80% of FHA borrowers are first-time homebuyers, and over 25% are homebuyers of color. The average home purchased with FHA-insured mortgages cost around half the price of the overall national median home and have an average mortgage amount of less than \$270,000.” [Fact Sheet, White House, [2/22/23](#)]
- **FHA loan borrowers putting less than 10% down have to pay FHA mortgage insurance until the entire loan term ends. So a 30-year mortgage with a 3.5% down payment option would have one paying MIP for the whole term.** “Current guidance states that FHA loan borrowers who put down less than 10 percent must pay FHA mortgage insurance until the entire loan term ends. So, if you have a 30-year mortgage, and you choose the popular 3.5 percent down payment option, you’ll be paying your MIP for the entire term (or for as long as you have the loan). If you put down at least 10 percent, you can have FHA MIP removed after 11 years of payments. So if you take out a 30-year mortgage in 2023, made a 15 percent down payment and make payments until 2034, the remaining 19 years of your loan would be without a mortgage insurance payment. The above is simple enough — but it applies to newly originated FHA loans. The FHA has changed its rules more than once on this issue, and often those changes aren’t retroactive.” [Bankrate, [11/8/23](#)]

**Project 2025 called on the next president to issue an EO making the HUD Secretary a member of the Committee on Foreign Investment in the U.S., allowing more oversight to address foreign threats, particularly from China.** “The President should issue an executive order making the HUD Secretary a member of the Committee on Foreign Investment in the U.S., which will gain broader oversight authorities to address foreign threats, particularly from China with oversight of foreign ownership of real estate in both rental and ownership markets of single-family and multifamily housing,26 with trillions worth of real estate secured across HUD’s portfolio.” [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended restricting eligibility for first time homebuyers and stopping affirmative obligation authorities for single-family housing programs.** “Statutorily restricting eligibility for first-time homebuyers and abandoning the affirmative obligation authorities erected for the single-family housing programs across federal agencies and government-sponsored enterprises.” [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

- **First time homebuyer qualifications include:**
  - Credit score of at least 620
  - Down payment of at least 3%
  - Debt-to-income ratio below 43%
  - Steady income
  - Two-year job history

- Clean credit history  
[MortgageReports.com, [10/6/23](#)]

- **Affirmatively furthering fair housing within HUD requires recipients to take meaningful action, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities that restrict access to opportunity.** “Title VIII of the Civil Rights Act of 1968, known as the Fair Housing Act, requires HUD and recipients of federal funds from HUD to affirmatively further the policies and purposes of the Fair Housing Act, also known as “affirmatively further fair housing” or “AFFH.” The obligation to affirmatively further fair housing requires recipients of HUD funds to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics, which are: Race Color National origin Religion Sex (including gender identity and sexual orientation) Familial status Disability” [U.S. Department of Housing and Urban Development, accessed [2/20/24](#)]
- **HUD and its recipients must do the following while administering programs and activities relating to housing and community development.** “Generally, in administering programs and activities relating to housing and community development, the federal government, HUD, and its recipients must: Determine who lacks access to opportunity and address any inequity among protected class groups Promote integration and reduce segregation Transform racially or ethnically concentrated areas of poverty into areas of opportunity” [U.S. Department of Housing and Urban Development, accessed [2/20/24](#)]

## Housing Equity

**Project 2025: The next administration should “immediately end the Biden Administration’s PAVE policies.”** “Additionally, departmental leadership should: 1. Immediately end the Biden Administration’s Property Appraisal and Valuation Equity (PAVE) policies and reverse any Biden Administration actions that threaten to undermine the integrity of real estate appraisals.<sup>28</sup>” [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

- **PAVE is a set of guidelines producing home appraisals free of racial and ethnic biases.** “Property Appraisal and Valuation Equity (PAVE) is a set of guidelines for producing home appraisals that are free of racial, ethnic, or any other form of bias. Historically, home appraisals have been skewed by biases that disproportionately harm homeowners in communities of color. This is one factor in the racial and ethnic wealth gap in the U.S. It has also contributed to the disparities in the rates of homeownership between people of different races and ethnicities and in the financial rewards associated with owning a home.” [Investopedia, [10/22/23](#)]

**Project 2025 called for the repeal of the Affirmatively Furthering Fair Housing regulation.** “Repeal the Affirmatively Furthering Fair Housing (AFFH) regulation reinstated under the Biden Administration<sup>30</sup> and any other uses of special-purpose credit authorities to further equity.<sup>31</sup>” [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

- **The regulation “directs HUD to ensure that the agency and its program participants proactively take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination.”** “On February 9, 2023, HUD published in the Federal Register a Notice of Proposed Rulemaking (NPRM) entitled ‘Affirmatively Furthering Fair Housing’. The proposed rule would faithfully implement the Fair Housing Act’s statutory mandate to affirmatively further fair housing (AFFH), which directs HUD to ensure that the agency and its program participants proactively take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination. The public comment period ended on April 24, 2023. HUD will take the upcoming months to review public comments before making revisions and finalizing the rule. The public can

check this webpage or at [regulations.gov](https://www.regulations.gov) for the final version.” [U.S. Department of Housing and Urban Development, accessed [6/24/24](#)]

**Project 2025 called for the elimination of the Housing Supply Fund.** “4. Eliminate the new Housing Supply Fund.32.” [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

- **The Housing Supply Fund is designed to reward states and localities that have already made reforms to ease affordable housing barriers by giving them additional funding.** “Housing Supply Fund grants to reduce affordable housing barriers. Building on the Unlocking Possibilities Program, the President’s 2023 Budget includes a mandatory spending proposal that would provide \$10 billion in HUD Grants to Reduce Affordable Housing Barriers for states and localities that have already adopted Housing Forward policies and practices to address challenges to housing supply production constraints. While Unlocking Possibilities would help states and localities undertake reform, the Housing Supply Fund would reward those that have already made reforms by giving them additional funding to boost the affordability and maximize the benefits of their new policies. This funding would also support broader housing development activities, including environmental planning and mitigation, road infrastructure, and water or sewer infrastructure.” [Press Release, White House, [5/16/22](#)]

## Climate Change

**Project 2025: HUD leadership should: “Repeal climate change initiatives and spending in the department’s budget request.”** [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

## Immigration

**Project 2025 recommended a regulation that “would prohibit noncitizens, including mixed-status families, from living in all federally assisted housing.”** “The Office of the Secretary should recommence proposed regulation put forward under the Trump Administration that would prohibit noncitizens, including all mixed-status families, from living in all federally assisted housing.33 HUD’s statutory obligations include providing housing for American citizens who are in need. HUD reforms must also ensure alignment with reforms implemented by other federal agencies where immigration status impacts public programs, certainly to include any reforms in the Public Charge regulatory framework administered by the U.S. Department of Homeland Security (DHS). Local welfare organizations, not the federal government, should step up to provide welfare for the housing of noncitizens.” [Department of Housing and Urban Development, Project 2025, accessed [6/24/24](#)]

- Block federal financial aid for up to two-thirds of all American college students if their state permits certain immigrant groups, including Dreamers with legal status, to access in-state tuition.
- • Terminate the legal status of 500,000 Dreamers by eliminating staff time for reviewing and processing renewal applications.
- • Use backlog numbers to trigger the automatic suspension of application intake for large categories of legal immigration.
- • Suspend updates to the annual eligible country lists for H-2A and H-2B temporary worker visas, thereby excluding most populations from filling critical gaps in the agricultural, construction, hospitality, and forestry sectors.
- • Bar U.S. citizens from qualifying for federal housing subsidies if they live with anyone who is not a U.S. citizen or legal permanent resident.
- • Force states to share driver’s licenses and taxpayer identification information with federal authorities or risk critical funding.

Niskanen <https://www.niskanencenter.org/wp-content/uploads/2024/02/Project-2025-Unveiling-the-far-rights-plan-to-demolish-immigration-in-a-second-Trump-term-1.pdf>

## Transportation and Infrastructure

## Top Lines

- ✓ Halt or stall IIJA and IRA programs that focus on renewable energy
- ✓ Rescind DOT's grantmaking ability and put the power with congress to give grants directly to states
- ✓ Reversal of the Biden-Harris Administration's pro-EV adoption stance
- ✓ Gut emissions regulations
- ✓ Remove safety measure for the development and use of automated vehicles
- ✓ Support joint-venture between airlines
- ✓ Separate the FAA from DOT and politicize its operations
- ✓ Separate MARAD from DOT and politicize its operations

**Project 2025 argued there was “little need” for a lot of the grantmaking in DOT’s authority.** “DOT’s fundamental problem is that instead of being able to focus on providing Americans with affordable and abundant transportation, it has become saddled with congressional requirements that reduce the department to a de facto grantmaking organization. Yet there is little need for much of this grantmaking, for two reasons.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 proposes to repeal the Inflation Reduction Act and Bipartisan Infrastructure Law.** “Support repeal of massive spending bills like the Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA), which established new programs and are providing hundreds of billions of dollars in subsidies to renewable energy developers, their investors, and special interests, and support the rescinding of all funds not already spent by these programs.” [p. 365]

## Gas Tax and User Fees

**Project 2025: “It is vital to consider the role of user fees and other pricing innovations with regard to transportation infrastructure. Airport landing fees for aircraft, toll charges on roads and bridges, and per-gallon taxes on gasoline and diesel fuel are all examples of user charges that affect the decisions of transportation system users.”** “New technology enables private companies to charge for transportation in many areas, which could transform how innovation is financed. It is vital to consider the role of user fees and other pricing innovations with regard to transportation infrastructure. Airport landing fees for aircraft, toll charges on roads and bridges, and per-gallon taxes on gasoline and diesel fuel are all examples of user charges that affect the decisions of transportation system users.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025: Funding for government infrastructure must come from either taxes or user fees.** “Some mistakenly think that using a P3 would allow a road or bridge to be delivered without increases in tolls or taxes. It is important to remember that all funding for governmental infrastructure comes from either taxes or user fees. P3 financing can be used to make those funding sources more efficient, but it cannot replace the need for taxes or user fees to provide the funding for the project.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

## Grants

**Project 2025 argued it would be more efficient for Congress to send transportation grants to 50 states individually.** “If funding must be federal, it would be more efficient for the U.S. Congress to send transportation grants to each of the 50 states and allow each state to purchase the transportation services that it thinks are best. Such an approach would enable states to prioritize different types of transportation according to the needs of their citizens. States that rely more on automotive transportation, for example, could use their funding to meet those needs.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the abolishment of DOT’s discretionary grant-making processes and argued funding should be based on state distributions.** “DOT’s discretionary grant-making processes should be abolished, and funding should be focused on formulaic distributions to the states, which know best their transportation needs and are incentivized to think of the long-term maintenance costs. At a bare minimum, the number of grants should be consolidated.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 on the Build America Bureau: “Should the BAB continue to exist and potentially disintermediate the private financing sector, it must maintain underwriting discipline and continue best practices of requiring rigorous financial modeling and cushion for repayment of loans in a variety of economic scenarios.”** “At certain times in the economic cycle, and for many lower-quality projects with more dubious economic return, similar loans from the private sector are simply not available. Should the BAB continue to exist and potentially disintermediate the private financing sector, it must maintain underwriting discipline and continue best practices of requiring rigorous financial modeling and cushion for repayment of loans in a variety of economic scenarios.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended BAB should ensure loan borrowers remain liable to ensure all funding is repaid no matter the economic circumstances.** “The BAB should ensure that these loans do not become grants in another form by maintaining the requirement that all project borrowers be rated at least investment grade by the major ratings agencies and that project sponsors remain liable to ensure that all financing is repaid, even in periods of financial stress and economic downturns.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

## Regulations

**Project 2025 pushed for the return of the Trump administration’s “rule on rules” approach to regulations.** “DOT would also reduce unnecessary burdens by returning to the Trump Administration’s ‘rule on rules’ approach to regulations, implemented in late 2019 as RIN 2105-AE84.4 This rule strengthened the Administration’s effort to remove outdated regulations, find cost-saving reforms, and clarify that guidance documents are in fact guidance rather than mandatory impositions. The Biden Administration unwisely moved away from this reform, and the next Administration should revive it without delay.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

## Safety

**Project 2025 recommended NHTSA update vehicle standards and publish performance-based rules for automated vehicles.** “NHTSA should work to remove regulatory barriers by focusing on updating vehicle standards as well as publishing performance-based rules for the operations of automated vehicles (AVs).” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the reversal of the DOT policy that mandates data collection and publication through a Standing General Order for automated vehicles.** “From a nonregulatory point of view, DOT has pivoted from a successful focus on the voluntary sharing of data to improve safety outcomes to adoption of a more compulsory and antagonistic approach to mandating data collection and publication through a Standing General Order related to automated vehicles. This needs to be reversed.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

## EVs

**Project 2025 argued the Biden administration’s push for increasing EV sales would work against national security interests, make the U.S. more dependent on China, and increase the vulnerability of the country’s power grid.** “In addition, the Biden Administration’s efforts to accelerate EV sales by regulatory fiat work against the national security interests of the United States in contravention of

Congress's goals under EPCA. Increasing the production of EVs will make the U.S. more dependent on China and other foreign countries that control the supply and processing of rare earth minerals that are needed for EV batteries. And the faster deployment of EVs will put a major strain on America's vulnerable power grid, requiring large investments in critical infrastructure and a big boost in the nation's electricity production, including from gas-fired and oil-fired power plants." [Department of Transportation, Project 2025, accessed [6/24/24](#)]

## Emissions

**Project 2025 contended that the Biden fuel economy regulations would have no meaningful impact on global temperature trends in the long term.** "In exchange for all of these harmful effects—on traffic safety, consumer choice, American jobs, the nation's air quality, and U.S. national security—the Biden fuel economy regulations are predicted to have no meaningful effect on global temperature trends over the long term." [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended lowering fuel economy levels.** "Reduce proposed fuel economy levels. The Administration should consider returning to the minimum average fuel economy levels specified by Congress for model year 2020 vehicles: levels aimed at achieving a fleet-wide average of 35 miles per gallon. Consideration should be given to maintaining the standards at those levels for the near term in order to promote the objectives laid out by Congress." [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 argued for the revocation of the special waiver to California and should exercise its authority over CARB and invalidate any inconsistent fuel economy requirements imposed, such as the ban on sales of internal combustion engines.** "Revoke the special waiver granted to California by the Biden Administration. California has no valid basis under the Clean Air Act to claim an extraordinary or unique air quality impact from carbon dioxide emissions, and EPCA is clear that under no circumstances may a state agency regulate fuel economy in place of DOT. The federal government should therefore exercise its preemptive authority over CARB and take all steps necessary to invalidate any inconsistent fuel economy requirements imposed by CARB, including its ban on sales of internal combustion engines." [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended the next conservative administration should:**

- Seek to refocus the Federal Highway Administration on maintaining and improving the highway system.
- Remove or reform rules and regulations that hamper state governments.
- Reduce the amount of federal involvement in local infrastructure decisions.

[Department of Transportation, Project 2025, accessed [6/24/24](#)]

## Airline Mergers and Foreign Ownership

**Project 2025 criticized the Biden administration for their opposition to the growth of major U.S. airlines, low-fare foreign airline competition, and joint ventures of smaller U.S. air carriers.** "The current Administration's policies are self-contradictory. In order to placate specific labor groups, the Biden Administration not only opposes the growth of the major airlines, which would reduce the price of air travel, but also opposes measures—such as low-fare foreign competition and joint ventures of smaller U.S. carriers—that would increase competition." [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025: The next administration should support joint-venture efforts between airlines, such as with Jet Blue and Spirit.** "To achieve a more level playing field and increase options for the traveling public, the next Administration should: I Publicly indicate that a new Administration would support joint-venture efforts by smaller carriers (for example, Jet Blue and Spirit) to achieve scale necessary to reduce costs and compete more effectively with the larger carriers." [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 urged the review of foreign ownership and control limitations of airlines.** “Review foreign ownership and control limitations and, if necessary, work with Congress to change existing statutes. Worldwide investors are providing access to capital to foreign airlines for innovations and new equipment purchases that U.S. airlines cannot match. The U.S. should use the Committee on Foreign Investment in the United States (CFIUS) process to keep out nefarious foreign actors while allowing investment from investors in designated like-minded countries so long as U.S.-based investors maintain plurality ownership.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

## FAA

**Project 2025 called on the next administration to separate FAA from DOT or separate the Air Traffic Organization from the FAA.** “To regain America’s global leadership in aviation, the next Administration should: 1 Separate the FAA from DOT or, at a minimum, separate the ATO from the FAA.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 wanted the FAA to operate more like a business.** “I Require the FAA to operate more like a business. The FAA has not made good use of the unique authority it has been given in areas like personnel and acquisition.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 wanted to separate ATO from FAA and relocate their headquarters.** “Separate the ATO from the FAA and relocate it to separate headquarters outside the District of Columbia.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Shift from aviation user taxes to fees for air traffic services paid directly to the ATO.”** [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025: “Allow the ATO to issue long-term revenue bonds for major projects.”** [Department of Transportation, Project 2025, accessed [6/24/24](#)]

## Mass Transit Funding

**Project 2025 came out against the Capital Investment Grants program, which funded transit expansion “rather than maintaining or improving current facilities.”** “The Capital Investment Grants (CIG) program is another example of Washington’s tendency to fund transit expansion rather than maintaining or improving current facilities. The CIG program, which began in 1991, funds only novel transit projects. These can include new rail lines (regardless of the demand for preexisting rail in the area) and costly operations such as streetcars. Because Americans have demonstrated a strong preference for alternative means of transportation, rather than throwing good money after bad by continuing federal subsidies for transit expansion, there should be a focus on reducing costs that make transit uneconomical. The Trump Administration urged Congress to eliminate the CIG program, but the program has strong support on Capitol Hill. At a minimum, a new conservative Administration should ensure that each CIG project meets sound economic standards and a rigorous cost-benefit analysis.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for a change to Section 10 © of the Urban Mass Transportation Act, which requires any agency receiving federal funds cannot reduce compensation for workers.** “The next Administration can remove the largest obstacle to reforming labor costs. Section 10© of the Urban Mass Transportation Act of 196414 was initially intended to protect bargaining rights for workers in privately owned transit systems that were being absorbed by government-operated agencies. The provision has mutated into a requirement that any transit agency receiving federal funds cannot reduce compensation, an interpretation that far exceeds the original statute. Returning to the original intent would allow transit agencies to adjust fringe benefits without fearing a federal lawsuit.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended moving “away from using the Highway Trust Fund to prop up mass transit.”** “It is also vital to move away from using the Highway Trust Fund to prop up mass transit. The fund was driven into insolvency (and repeated bailouts) through decades of transfers to transit without any increase in transit usage to show for it. With the federal government facing mounting debt, the best course of action would be to remove federal subsidies for transit spending, allowing states and localities to decide whether mass transit is a good investment for them.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

## Railroad

**Project 2025 argued the Federal Railroad Administration’s Notice of Proposed Rulemaking on crew size was not based on safety considerations and should be changed.** “FRA’s Notice of Proposed Rulemaking (NPRM) on crew size is not based on safety considerations; it is designed to reduce flexibility by making it impossible for railroads to operate with crews of fewer than two in circumstances where there is no operational need for the second crew member.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

## Maritime Administration

**Project 2025 recommended the Maritime Administration be transferred to the Department of Defense or to DHS.** “MARAD, including its subordinate Service Academy (the U.S. Merchant Marine Academy) should be transferred to the Department of Defense (if the Coast Guard is located there because DHS has been eliminated) or to the Department of Homeland Security. In this way, the two agencies charged with oversight and regulation of the Maritime sector—MARAD and the United States Coast Guard—would be aligned under the same department where operational efficiencies could be realized more easily.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommended seriously considering repealing or significantly reforming the Jones Act.** “Serious consideration should be given to repealing or substantially reforming the Jones Act, 16 which would require legislation. The economic costs of the Jones Act, which is notionally in place to promote a robust Merchant Marine, vastly exceed its effect on the supply of domestic ships. For instance, no liquified natural gas (LNG) can be shipped from Alaska to the lower 48 states because there are no U.S.-flagged ships that carry LNG. If there are genuine concerns about U.S. fleet capacity in the absence of the Jones Act, it would be possible to do so through an expansion of the Defense Reserve Fleet.” [Department of Transportation, Project 2025, accessed [6/24/24](#)]

## Elections

### Top Lines

- ✓ Remove contribution limits for donations
- ✓ Kneecap the ability of the Federal Elections Commission from enforcing campaign finance FEC’s enforcement power

**Project 2025 called for a raise in contribution limits, saying they “serve no practical anti corruption purpose.”** “Contribution limits should generally be much higher, as they hamstring candidates and parties while serving no practical anticorruption purpose. And a wide range of reporting requirements have not been indexed to inflation, clogging the public record and the FEC’s internal processes with small-dollar information of little use to the public.” [Federal Elections Commission, Project 2025, accessed [6/24/24](#)]

**Claims a major issue at the FEC is “overenforcement” of the law.** “When taking any action related to the FEC, the President should keep in mind that, as former FEC Chairman Bradley Smith says, the ‘greater problem at the FEC has been overenforcement,’ not underenforcement as some critics falsely



allege.<sup>15</sup> As he correctly concludes, the FEC’s enforcement efforts ‘place a substantial burden on small committees and campaigns, and are having a chilling effect on some political speech...squeezing the life out of low level, volunteer political activity.’ [Federal Elections Commission, Project 2025, accessed [6/24/24](#)]

**Project 2025 called for the elimination of USCYBERCOM’s efforts to protect U.S. elections from bad actors in cyberspace including foreign actors.** “End USCYBERCOM’s participation in federal efforts to ‘fortify’ U.S. elections to eliminate the perception that DOD is engaging in partisan politics.” [Department of Defense, Project 2025, accessed [6/24/24](#)]

## Culture War

### Top Lines

- ✓ Legislate and implement national extreme abortion bans
- ✓ Cut off federal funding from states with any pro-choice policies in place
- ✓ Removing all reproductive health and DEI related terms from federal laws and rules
- ✓ Abolish teaching about reproductive health in schools
- ✓ Ban corporate and federal DEI programs
- ✓ Ban gender confirmation surgery for minors
- ✓ Ban pornography and punish those who produce it
- ✓ Invoke the Insurrection Act to shut down protests
- ✓ Infuse Christian Nationalism into the highest levels of government

### Anti-Abortion

**Project 2025: Conservatives in the next administration “should work with Congress to enact the most robust protections for the unborn that Congress will support while deploying existing federal powers to protect innocent life and vigorously complying with statutory bans on the federal funding of abortion.”** “Finally, conservatives should gratefully celebrate the greatest pro-family win in a generation: overturning Roe v. Wade, a decision that for five decades made a mockery of our Constitution and facilitated the deaths of tens of millions of unborn children. But the Dobbs decision is just the beginning. Conservatives in the states and in Washington, including in the next conservative Administration, should push as hard as possible to protect the unborn in every jurisdiction in America. In particular, the next conservative President should work with Congress to enact the most robust protections for the unborn that Congress will support while deploying existing federal powers to protect innocent life and vigorously complying with statutory bans on the federal funding of abortion. Conservatives should ardently pursue these pro-life and pro-family policies while recognizing the many women who find themselves in immensely difficult and often tragic situations and the heroism of every choice to become a mother. Alternative options to abortion, especially adoption, should receive federal and state support.” [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025 called on Congress to pass a law that clarified that no employer would be required to provide accommodations or benefits for abortion.** “Pass a law requiring equal (or greater) benefits for pro-life support for mothers and clarifying abortion exclusions. Congress should pass a law requiring that to the extent an employer provides employee benefits for abortion, it must provide equal or greater benefits for pregnancy, childbirth, maternity, and adoption. That law should also clarify that no employer is required to provide any accommodations or benefits for abortion.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants Congress and DOL to clarify that the Employee Retirement Income Security Act “does not preempt states’ power to restrict abortion” or surrogacy.** “Keep anti-life ‘benefits’ out

of benefit plans. Some benefits attorneys and pro-choice advocates have argued since the Supreme Court's *Dobbs v. Jackson Women's Health Organization* decision<sup>6</sup> that the longstanding doctrine of Employee Retirement Income Security Act of 1974 (ERISA)<sup>7</sup> preemption should block individual states' efforts to prohibit employers from helping employees procure abortions via offering various kinds of coverage under employee-sponsored benefit plans. ERISA should not be allowed to trump states' ability to protect innocent human life in the womb. Congress and DOL should clarify that ERISA does not preempt states' power to restrict abortion, surrogacy, or other anti-life 'benefits.'" [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 wants increased surveillance on abortion and the withholding of funds to states that do not report explicit details on abortion procedures and the mother.** "Data Collection. The CDC's abortion surveillance and maternity mortality reporting systems are woefully inadequate. CDC abortion data are reported by states on a voluntary basis, and California, Maryland, and New Hampshire do not submit abortion data at all. Accurate and reliable statistical data about abortion, abortion survivors, and abortion-related maternal deaths are essential to timely, reliable public health and policy analysis. Because liberal states have now become sanctuaries for abortion tourism, HHS should use every available tool, including the cutting of funds, to ensure that every state reports exactly how many abortions take place within its borders, at what gestational age of the child, for what reason, the mother's state of residence, and by what method. It should also ensure that statistics are separated by category: spontaneous miscarriage; treatments that incidentally result in the death of a child (such as chemotherapy); stillbirths; and induced abortion. In addition, CDC should require monitoring and reporting for complications due to abortion and every instance of children being born alive after an abortion." [Centers for Disease Control and Presentation, Project 2025, page 466]

## Anti-Diversity

**Project 2025 recommends deleting terms such as "diversity, equity and inclusion", "gender", "reproductive health", "reproductive rights", among others in every federal rule, agency regulation, contract, grant, and regulation, arguing it deprives Americans of their First Amendments rights.** "The next conservative President must make the institutions of American civil society hard targets for woke culture warriors. This starts with deleting the terms sexual orientation and gender identity ('SOGI'), diversity, equity, and inclusion ('DEI'), gender, gender equality, gender equity, gender awareness, gender-sensitive, abortion, reproductive health, reproductive rights, and any other term used to deprive Americans of their First Amendment rights out of every federal rule, agency regulation, contract, grant, regulation, and piece of legislation that exists." [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025: "The noxious tenets of 'critical race theory' and 'gender ideology' should be excised from curricula in every public school in the country."** "The noxious tenets of 'critical race theory' and 'gender ideology' should be excised from curricula in every public school in the country. These theories poison our children, who are being taught on the one hand to affirm that the color of their skin fundamentally determines their identity and even their moral status while on the other they are taught to deny the very creatureliness that inheres in being human and consists in accepting the givenness of our nature as men or women." [Foreword, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommends issuing an EO banning and for Congress to pass a law banning the federal government from using taxpayer money to fund CRT trainings.** "Issue an executive order banning, and Congress should pass a law prohibiting the federal government from using taxpayer dollars to fund, all critical race theory training (CRT)." [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

**Project 2025 recommends the enforcement of Title VII by DOJ and EEOC to prohibit racial classifications and quotas, including DEI trainings promoting CRT.** "Direct DOJ and EEOC to enforce Title VII. The President should direct the Department of Justice and Equal Employment Opportunity Commission to enforce Title VII to prohibit racial classifications and quotas, including human-

resources classifications and DEI trainings that promote critical race theory.” [Department of Labor and Related Agencies, Project 2025, accessed [6/24/24](#)]

### Anti-LGBTQIA+

**Project 2025: “Allowing parents or physicians to ‘reassign’ the sex of a minor is child abuse and must end.”** “Allowing parents or physicians to ‘reassign’ the sex of a minor is child abuse and must end. For public institutions to use taxpayer dollars to declare the superiority or inferiority of certain races, sexes, and religions is a violation of the Constitution and civil rights law and cannot be tolerated by any government anywhere in the country.” [Foreword, Project 2025, accessed [6/24/24](#)]

### Banning Pornography

**Project 2025: “Pornography should be outlawed. The people who produce and distribute it should be imprisoned.”** “Pornography, manifested today in the omnipresent propagation of transgender ideology and sexualization of children, for instance, is not a political Gordian knot inextricably binding up disparate claims about free speech, property rights, sexual liberation, and child welfare. It has no claim to First Amendment protection. Its purveyors are child predators and misogynistic exploiters of women. Their product is as addictive as any illicit drug and as psychologically destructive as any crime. Pornography should be outlawed. The people who produce and distribute it should be imprisoned. Educators and public librarians who purvey it should be classed as registered sex offenders. And telecommunications and technology firms that facilitate its spread should be shuttered.” [Foreword, Project 2025, accessed [6/24/24](#)]

### First Amendment

**The Center for Renewing America wants Trump to invoke the Insurrection Act on day one of his administration to quash protests.** “Others include invoking the Insurrection Act on Day One to quash protests and refusing to spend authorized congressional funds on unwanted projects, a practice banned by lawmakers in the Nixon era.” [Politico, [2/20/24](#)]

### Christian Nationalism

**HEADLINE: “Trump allies prepare to infuse ‘Christian nationalism’ in second administration.”** [Politico, [2/20/24](#)]

**Russell Vought, Trump’s former director of OMB and the current president of The Center for Renewing America, is spearheading efforts “to infuse Christian nationalist ideas” into a potential second Trump administration.** “An influential think tank close to Donald Trump is developing plans to infuse Christian nationalist ideas in his administration should the former president return to power, according to documents obtained by POLITICO. Spearheading the effort is Russell Vought, who served as Trump’s director of the Office of Management and Budget during his first term and has remained close to him. Vought, who is frequently cited as a potential chief of staff in a second Trump White House, is president of The Center for Renewing America think tank, a leading group in a conservative consortium preparing for a second Trump term.” [Politico, [2/20/24](#)]

**Center for Renewing America’s top priorities for a second Trump administration includes “Christian nationalism” as a bullet point.** “One document drafted by CRA staff and fellows includes a list of top priorities for CRA in a second Trump term. ‘Christian nationalism’ is one of the bullet points.” [Politico, [2/20/24](#)]

**Vought has close ties to Christian nationalist William Wolfe, who has advocated for overturning same-sex marriage, ending abortion, and reducing access to contraceptives.** “Vought has a close affiliation with Christian nationalist William Wolfe, a former Trump administration official who has

advocated for overturning same-sex marriage, ending abortion and reducing access to contraceptives.” [Politico, [2/20/24](#)]

**Project 2025 centers religion and marriage as the building blocks of a healthy society.** “On what makes a good society: ‘These are the mediating institutions that serve as the building blocks of any healthy society. Marriage. Family. Work. Church. School. Volunteering.’” [Foreword, Project 2025, accessed [7/17/24](#)]

**Project 2025 integrates and Prioritizes Faith Based Initiatives into “all of the Agency’s programs”.** “The next conservative Administration must champion the core American value of religious freedom, which correlates significantly with poverty reduction, economic growth, and peace. It should train all USAID staff on the connection between religious freedom and development; integrate it into all of the agency’s programs, including the five-year Country Development and Coordination Strategies due for updates in 2025; strengthen the missions’ relationships with local faith-based leaders; and build on local programs that are serving the poor. Congress should appropriate funding to USAID specifically to support persecuted religious minorities in line with Executive Order 13926. [Agency for International Development, Project 2025, page 262]