

Inside Project 2025

Backed by the Heritage Foundation, the initiative seeks to undermine longstanding safeguards against abuses of executive power.

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Democracy

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The week after taking office in 2017, Donald Trump announced his administration’s signature policy on the administrative state—the constellation of agencies, institutions, and procedures that Congress has created to help the president implement the laws it passes—when he [signed](#) Executive Order 13771. The directive purported to [create](#) a “regulatory budget” scheme that prohibited agencies from issuing a new rule unless they first repealed two existing rules *and* ensured that the resulting cost savings offset any costs the new rule might impose.

In the years since Steve Bannon called for the “deconstruction of the administrative state,” the conservative movement has come to embrace it—for archconservative ends.

The effort failed. While federal agencies reduced their regulatory output during the Trump administration, they made little lasting progress in [repealing](#) existing rules. The Administrative Procedure Act, which [governs](#) much of how the administrative state operates, makes it hard to do so. Most of the Trump administration’s repeal attempts were met with [rejection](#) by federal courts for failing to abide by basic procedural requirements.

Still, Executive Order 13771 perfectly encapsulated conservative thinking about regulatory policy at the time. The goal was to bring about the “deconstruction of the administrative state,” as former Trump advisor Steve Bannon famously [put](#) it. This view was in keeping with decades of conservative hostility for this arm of government, which the right has long [tarred](#) as an economic and constitutional disaster.

But that was then. In the years since, the conservative movement has coalesced around a very different way of thinking about the administrative state—one that sees it as a vehicle for advancing the conservative movement’s agenda, particularly on social issues, and thus embraces policy changes that would *strengthen* many aspects of its governing apparatus. There’s still plenty of room for deconstruction in this vision, particularly when it comes to issues like worker rights and environmental protection. Indeed, the Supreme Court’s conservatives demonstrated their continued commitment to the deconstruction project with their [decision](#) last week striking down the four-decade-old *Chevron* deference doctrine—a move that will make it easier for conservative federal judges to strike down rules they oppose on ideological grounds. But these goals are now presented alongside calls for things like enhanced agency enforcement capacity and strategies for evading congressional oversight—priorities that would have been unthinkable for a conservative regulatory agenda just a few years ago.

The best example of this shift is Project 2025, the Heritage Foundation–led “presidential transition” attack [plan](#) that would guide a second Trump administration should he win this November. The effort was spearheaded by Heritage president Kevin Roberts in 2022; a 920-page document called *Mandate for Leadership*, published in April last year, sets out a comprehensive blueprint in technocratic detail. The product of a broad coalition of ultra-right-wing think tanks and advocacy organizations, the plan has contributions from the Center for Renewing America (an organization committed to [promoting](#) Christian nationalism), Susan B. Anthony Pro-Life America (a prominent group [fighting reproductive rights](#)), and FreedomWorks (the Koch-founded organization responsible for [mainstreaming](#) the Tea Party agenda, which has since dissolved but nevertheless helped lay the foundation for the conservative movement’s evolution in thinking on matters of regulatory policy). It [covers](#) nearly every policy issue you can think of, from defense budgets to bank regulation to highway construction. (For his part, Bannon has [expressed](#) general support for the initiative, but it is unclear whether he appreciates—or even cares about—the shift it represents.)

Project 2025 is candid about its ultimate goal: to reprogram the U.S. administrative state to support and sustain archconservative rule for decades to come. The distinguishing features of this regime would include a far more politicized bureaucracy, immunity against meaningful public or congressional oversight, abusive deployment of agency enforcement capabilities as a tool of political retribution, and aggressive manipulation of federal program implementation in the image of Christian nationalism, white supremacy, and economic inequality.

One of the *Mandate*’s prevailing themes is that the administrative state has become a major platform from which the radical left is able to [smuggle](#) its “woke” agenda into nearly every nook and cranny of our society. In light of this alleged shift, Project 2025 concludes that deconstruction is no longer the right strategy. Instead, the administrative state must be aggressively harnessed and then redirected. This is not a brand-new idea; conservatives have weaponized the administrative state to fight culture wars in the past, including putting arbitrary [regulations](#) on abortion clinics and introducing stringent [eligibility](#) requirements for food assistance programs. But these experiments have largely been episodic and disjointed. Project 2025’s novelty lies in the fact that it wants to make them, for the first time, into a comprehensive strategy.

Russell Vought, Trump’s former Director of the Office of Management Budget (OMB), succinctly describes this new strategy in a chapter he wrote for *Mandate for Leadership*: “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.” Doing so, the *Mandate* argues, requires [giving](#) a second Trump administration nearly unchecked power over the machinery by which the administrative state operates: the institutions, the procedures, the resources, and the personnel.

Project 2025 is clearly designed to avoid the pitfalls that doomed Executive Order 13771. In many ways, *Mandate for Leadership* can be read as an instruction manual for undermining the safeguards meant to [prevent](#) governing officials from engaging in the abuses of power Project

2025 wants to encourage. Replete with methodical detail and technocratic jargon, it offers future political leadership across all the federal administrative agencies a full taxonomy of tactics they can deploy to either exploit the weak points in these safeguards or bypass them altogether.

One of the *Mandate*'s central tactics concerns rules around staffing. Currently, agencies [hire](#) professional career staff with specialized training and expertise. All must swear an oath to follow the Constitution in carrying out their duties—even and especially if that means disobeying the orders of someone higher up in the bureaucratic hierarchy. As such, these career staff [provide](#) perhaps the most important line of defense against an autocratic presidential regime. But through a policy called Schedule F, the *Mandate* seeks to sideline or even purge them. Derived from another of Trump's [executive orders](#), the proposal would reclassify the thousands of career government employees who play some role in policy formation outside of the competitive service—the federal personnel category that includes rigorous, merit-based requirements for hiring, firing, and promotion decisions. Stripped of these basic [protections](#), which have been in place for over 140 years, many employees would become “at will,” fireable for any reason—or no reason at all. The intent is obvious: to encourage public servants to obey their political bosses, even when that means going against the law and their own expertise. Were it to take effect, workers who refuse to toe the line could be summarily terminated.

And to buttress the effect of Schedule F, *Mandate for Leadership* includes several more targeted methods for isolating recalcitrant public servants. Its chapter on the intelligence community, for instance, describes policy changes that would make it easier to [suspend or revoke](#) security clearances for career staff at national security–related agencies. Without their security clearances, these individuals would no longer be able to perform their jobs—and that, of course, is the point. Other sections contemplate taking similarly hostile actions against members of the Senior Executive Service, a special band within the civil service [created](#) to serve as a bridge between political appointees and lower-line career staff by providing management support and expertise. Members who step out of line might find themselves being relocated to far-flung geographic locations or reassigned to positions unrelated to their area of expertise.

The flip side of silencing or firing career public servants is to empower extremists and amplify outlier viewpoints—a move *Mandate for Leadership* has plenty of ideas about how to accomplish. One of these is simply to point Schedule F and security clearance abuses in the opposite direction. Unburdened by the competitive hiring process, agencies could [hire](#) whomever they wanted for career civil service positions. Project 2025 makes clear that unquestioned loyalty to the president, as opposed to professionalism and expertise, is the only real qualification that matters. Similarly, political appointees would have a freer hand to assign security clearances, ensuring loyal voices are heard loud and clear when it comes to conducting intelligence assessments to inform national security decisions.

Mandate for Leadership at times even directly requires consideration of outlier views. One of its recommendations to “improve” the President’s Daily Briefing (PDB) on national security issues is to create a mechanism that ensures the inclusion of “properly channeled dissent.” *Mandate* fails to specify what constitutes a proper channel, but the broader context of

the recommendation indicates a hostility toward the independent viewpoints of career intelligence officers as well as a desire to transform these documents from objective analyses into advocacy documents.

Another group of proposed tactics builds on the longstanding conservative tradition of outsourcing critical government functions to the private sector. Even here, though, the goal isn't simply to shrink government but to advance Project 2025's broader ideological agenda as well. The chapter on the Department of Energy, for instance, urges consideration of outsourcing the functions of the Energy Information Administration (EIA), a small statistical agency charged with gathering and analyzing data regarding U.S. energy systems. The information products that the EIA generates are crucial for informing energy-related policymaking and investments by the electricity and oil and gas sectors; it is perhaps best known for the different "outlooks" it [publishes](#) that forecast future energy trends. While conceding that the EIA's products are generally "neutral"—if anything, the agency's outlooks have been [criticized](#) for being too pessimistic about renewable energy—*Mandate* still suggests that the reform could be beneficial overall by reducing the costs of government. Previous experience with privatization [casts](#) doubt on this prediction. More troubling still, businesses interested in securing future lucrative contracts might deliberately produce analyses that align with the president's preferred policy positions on energy. A future president opposed to urgent climate action, for instance, might be able to use biased analyses to oppose policies aimed at promoting renewable energy development.

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Mandate for Leadership elsewhere calls for dismantling the National Oceanic and Atmospheric Administration's (NOAA) lifesaving weather forecasting capabilities and outsourcing them to private companies. Such a move could [exacerbate](#) economic and racial inequity if the private company were to put those forecasts—which are now freely available to everyone—behind a paywall that might be unaffordable for many families. More ominously still, a company responding to profit incentives might create what amounts to a two-tier forecasting system, with more accurate forecasts available only for wealthier parts of the country. Low-quality forecasts in poorer areas would leave residents unable to plan for the kind of extreme weather conditions that are becoming more prevalent with climate change, putting their lives and property at risk of unnecessary harm.

Alongside its calls for expanded privatization, *Mandate for Leadership* advocates for politicizing existing relationships with contractors. Its chapter on the U.S. Agency for International Development (USAID), for instance, recommends that the agency end its reliance on "global [non-governmental organizations]" such as Oxfam International for distributing humanitarian assistance, and instead turn the work over to "faith-based organizations," including both local churches as well as larger U.S.-based organizations such as Catholic Relief Services and Knights of Columbus—the perfect vehicles for indoctrinating aid recipients in the conservative Christian ideology that is at Project 2025's core.

Previously, the Trump administration [used](#) these humanitarian assistance programs as leverage to induce recipient countries to join the infamous Geneva Consensus Declaration on Women’s Health and Protection of the Family (GCD). The international agreement, developed outside of any recognized international governance structures such as the United Nations, binds signatory countries in adopting domestic and foreign policies that [oppose abortion](#). Consistent with these neocolonial aspirations, *Mandate for Leadership* strongly embraces the GCD, envisioning the use of humanitarian aid programs implemented by faith-based organization contractors to expand its reach to new countries.

More generally, *Mandate for Leadership* calls for weaponizing contractor policy against companies with “woke” policies. Come 2025, a company that has adopted certain kinds of Diversity, Equity, Inclusion, and Justice (DEIJ) programs might find itself ineligible for many federal grant opportunities. The chapter on the Department of Education would prohibit public schools that receive federal assistance from entering contracts with companies that recognize transgender people’s pronouns—a set of policies that would complement recently [adopted](#) legislation in conservative states that prohibit DEIJ programs in public institutions of higher education.

Mandate for Leadership also contains several recommendations for how agencies could weaponize federal grantmaking to advance conservative policy objectives. For instance, the chapter on the Department of Health and Human Services recommends that the Teen Pregnancy Prevention and Personal Responsibility Education programs prioritize grants for abstinence-only programs. The chapter on the Environmental Protection Agency calls for radically overhauling that agency’s grants program, which distributes hundreds of millions of dollars in discretionary grants every year. *Mandate* would end the practice of career staff making these grant determinations and instead assign this task to a “political appointee.”

Perhaps the most disquieting category of tactics in *Mandate for Leadership* involves the aggressive, politicized use of agency enforcement powers.

The chapter on the Department of Justice (DOJ) proposes overhauling the agency to [eliminate](#) its longstanding tradition of political insulation from the White House. In theory, this insulation follows from the idea that the job of the DOJ’s head, the attorney general, is to represent the U.S. government and not the president. Institutional mechanisms have been used to ensure the agency’s independence and to guard against both the perception and reality of conflicts of interest, including, most notably, the use of a special counsel to investigate and prosecute the president or certain administration officials. As was demonstrated during the first Trump term, though, the actual independence of a special counsel can be [limited](#). *Mandate* would seek to further degrade the DOJ’s independence by injecting greater presidential control into questions of litigation strategy, even raising the disturbing specter of the president [targeting](#) political enemies with enforcement actions.

Likewise, in its chapter on the Department of Homeland Security, the document outlines various proposals aimed consolidating and strengthening enforcement policies at U.S. Immigration and

Customs Enforcement. These include giving individual agents greater leeway to [arrest](#) immigrants with suspected criminal records and expanding the geographic scope of Expedited Removal procedures—the [summary removal](#) of noncitizens without a hearing. *Mandate* would permit these procedures to be applied to individuals more than 100 miles from the U.S.-Mexico border, which was the traditional limit, with no apparent bright-line geographic restrictions.

Project 2025 also envisions expanded use of the Insurrection Act of 1807, which authorizes the president to use the military for domestic law enforcement purposes under rare, extreme circumstances. In 2020 Trump threatened to [use](#) this authority to quell the Black Lives Matter protests that took place in the wake of George Floyd’s murder before being discouraged from doing so by his advisors. *Mandate for Leadership*, while not citing the law by name, does appear to endorse its use as part of its broader border control strategy, recommending calling in “active-duty military personnel and National Guardsmen to assist in arrest operations along the border—something that has not yet been done.” Citing internal documents and an anonymous source, the *Washington Post* has [reported](#) that key personnel involved in Project 2025 have plans to use the Insurrection Act even beyond what *Mandate for Leadership* lays out for it.

Mandate for Leadership’s final set of tactics for hijacking the administrative state have to do with limiting or evading congressional oversight. Several chapters, for instance, describe how the administration can [manipulate](#) the Federal Vacancies Reform Act by installing political appointees in key agency leadership positions—a gambit whose practical effect is to enable politically loyal personnel to carry out official agency business without being subjected to the lengthy, and potentially embarrassing, Senate confirmation process.

Other chapters recommend giving the president greater control over communications between agencies and committees of jurisdictions with Congress, with the apparent aim of controlling the flow of information that members of Congress and their staff receive. Instituting these changes would clearly undermine Congress’s ability to conduct meaningful oversight for these agencies. The chapter on the DHS, for example, calls for the president to demand that only one committee in each chamber serve as an authorizing committee for the agency (currently there are at least six authorizing committees in the House and four more in the Senate). 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. Similarly, the chapter on the Department of State recommends that agencies defer to the White House on relevant communications with Congress—meaning that in practice, discussions on certain issues of agency business would have to first go through the president.

Congress and the federal judiciary have long been ripe for capture by elite minority factions to serve and sustain their rule. But the administrative state, which is of a much more recent vintage, was supposed to be different.

In the years following the Civil War, and then later during the Progressive Era, [reformers and advocates](#) sought to build a governing institution that would be [more inclusive and](#)

[democratically responsive](#). The Interstate Commerce Commission and other early experiments in federal regulatory governance demonstrated that the administrative state could stand up to powerful economic interests and ensure a fairer marketplace for consumers and small businesses while [protecting](#) democracy against ever-evolving oligarchic threats. Meanwhile, rapid industrialization and urbanization laid bare the limitations of using civil lawsuits to address harms from dangerous business practices. Agencies like the Food and Drug Administration, first created in 1906, offered the promise of using standards developed and implemented by scientists and other experts to prevent such harms from occurring in the first place. These and other regulatory frameworks created by Congress established a new model in which agencies would be empowered to continually respond to new and emerging threats.

Degrading Congress and the federal judiciary were important first steps for the right, but administrative state would be the real prize.

The genius of the administrative state's design was that it would provide a permanent forum in which [public input and professional expertise](#) could be leveraged to solve the people's problems in ways that elected officials would, or could, not. [Scholars](#) of [U.S. democracy](#) have long recognized its potential to serve as a platform for building and sustaining true, durable public power. At its best, they argue, it can provide ordinary citizens with a locus of countervailing power in the political marketplace. It's clear, then, why the modern conservative movement has come to see it as such a threat.

And that is the real import of Project 2025: it seeks to corrupt the administrative state by transforming it from a dynamic base of democratic power into a fierce weapon of social and economic conservatism. What will happen if it succeeds? Once the damage has been done, the task of sustaining minority rule for decades to come would be much easier for the conservative movement. Degrading the institutions of Congress and the federal judiciary were important first steps toward rebuilding the United States in line with its vision of Christian nationalist principles, white supremacy, and economic inequality. Seizing control of the administrative state would be the real prize.

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