



Facts in the Flood

Education First's analysis of federal education policy under the Trump Administration

What to Expect: Project 2025 and Trump's Education Policy Agenda

Prepared by Education First

April 30, 2025

This resource is part of *Facts in the Flood*: Ed First's analysis of federal education policy under the Trump Administration

The [*Facts in the Flood*](#) series is designed to help education organizations understand the Trump Administration's education policy actions and develop strategies for navigating the new policy environment.

Strategies for Responding

This slide deck provides frameworks to help education organizations respond to federal policy changes.

Federal Policy Resource Hub

This document provides curated links to helpful resources for understanding the Administration's actions and their potential impacts.

ESEA Waivers 101

This brief details what states need a waiver to do, which requirements can and cannot be waived and what the waiver request process looks like.

Federal Education Policy Primer

This slide deck explains the reach and limits of federal authority over education, and how each branch of the federal government impacts education policy.

What to Expect

This deck reviews how Trump's actions on education policy align with Project 2025 and his campaign platform. It also previews what future actions the Administration may take based on those plans.

This deck



Executive Summary: Trump's education policy actions so far align with conservative policy playbooks released before the election

- While Trump's actions have been unprecedented, they are not unpredictable. Thus far, his federal education policy actions have **followed Project 2025 and Agenda 47**, conservative policy playbooks released before the election.
- Therefore, those policy documents can **help foreshadow upcoming policy actions** the Administration might take.
- To date, the Trump administration has taken **significant action to rollback "DEI" policies and shrink the federal role in K12 education.**
 - + Moving forward, stakeholders can likely **expect further action to reduce federal funding, expand school choice and "parents' rights" and restructure student loans.**
 - + **Bipartisan areas, like expanding career pathways,** have only recently seen action from the Administration.

This deck evaluates Trump's actions in the context of Project 2025 and Agenda 47 plans, to help stakeholders understand what policies they can expect going forward.

Project 2025 and Agenda 47 were alike blueprints for a Trump administration

- Throughout this deck, “**policy playbooks**” refers to the **set of proposals laid out in Project 2025 and Agenda 47** ahead of the election
 - + **Project 2025** was a highly-detailed policy agenda for a potential Trump administration, organized by the Heritage Foundation
 - + **Agenda 47** was Trump’s official, less detailed policy agenda
 - + From a policy perspective, **Project 2025 and Agenda 47 were largely interchangeable**
- **Trump has largely followed this policy playbook** during his first 100 days in office
 - + His EOs have mainly focused on ending DEI programs and shrinking the role of USED. They have also emphasized school choice, “parent’s rights,” apprenticeships and work-based learning and scaling back student loan programs.
 - + A number of the **policy playbook authors have been nominated to high-ranking positions in Trump’s Administration**

While these playbooks had some policy differences, they varied in grain size more than substance

Policy Priority	Agenda 47	Project 2025
Eliminate USED and revert control of education to the states	✓	✓
Establish “parental rights” in education	✓	✓
Eliminate “CRT” and “DEI” programs and LGBTQIA+ protections in schools	✓	✓
Expand school choice and education savings accounts (ESAs)	✓	✓
Expand CTE and career pathways	✓	✓
Cut federal funding for Title 1, Head Start and IDEA		✓
Eliminate loan forgiveness programs and revamp the college accreditation system	✓	✓
Allow teachers with permits to carry concealed weapons	✓	
End teacher tenure and adopt merit pay	✓	
Allow prayer and reading the Bible in schools	✓	

Given Republicans' slim margins in Congress, the playbooks are largely being implemented through executive actions

Branch	Political Control	Powers Available to Party in Control
Legislative	<p>Republicans have a majority of seats in both chambers of Congress:</p> <ul style="list-style-type: none"> ■ Senate: R 53, D 47 ■ House: R 220, D 215 	<ul style="list-style-type: none"> ✓ Pass budget-related bills via reconciliation ✗ Pass partisan legislation (cannot override a Democratic filibuster) ✓ Approve agency appointments and judges
		<ul style="list-style-type: none"> ✓ Issue executive orders and executive actions ✓ Issue regulations, guidance, waivers and grants (via ED) ✓ Appoint agency officials and judges ✓ Control the "bully pulpit" (i.e., informal power to focus public attention)
Executive	<p>Donald Trump holds the presidency and appointed ED leadership</p>	

Though Congress has introduced many bills aligned with Trump's agenda, the threat of a filibuster in the Senate creates a challenging path to them passing.

Therefore, most of the actions impacting education policy are being driven by authority given to the executive branch.

Ultimately, this may limit what policies can be changed in the long term, given restrictions on executive power.

These executive actions fall into several buckets aligned with the priorities communicated in the pre-election playbooks

Updated 4/21/25. Not comprehensive.

Roll back “DEI” policies	Increase immigration enforcement and deportations*	Cut federal funding
<ul style="list-style-type: none">■ EOs eliminating DEI programs■ EOs blocking transgender recognition■ “Dear Colleague” letter warning against DEI, loss of funding	<ul style="list-style-type: none">■ Laken Riley Act■ Anti-immigration EOs, including EO ending birthright citizenship■ ICE Raids■ Undocumented residents registry	<ul style="list-style-type: none">■ Cuts to ED programs, including IES, RELs, Comprehensive Centers and teacher pipeline programs■ Withholding of ESSER reimbursement funds
Expand career pathways	Expand school choice and “parents’ rights”	Dismantle US Department of Education (ED)
<ul style="list-style-type: none">■ EOs focused on AI work-based learning and expanding registered apprenticeships■ Congressional interest in WIOA and short-term Pell changes	<ul style="list-style-type: none">■ EO prioritizing school choice in discretionary grants■ ED Title I funding guidance■ EO requesting report on “protecting parental rights”	<ul style="list-style-type: none">■ EO stating intent to close ED■ Sec. McMahon issues “Final Mission”■ Reduction in force (RIF) at ED, hiring freeze, etc.

**Note: This deck does not contain information related to Trump’s immigration policies. It does include information on higher education & student loans and teacher pay & tenure, which are not represented in the above categories.*

Among the playbooks' priorities, the administration has focused so far on "culture war" issues and shrinking the federal role in education

Many actions taken by Administration

- Rollback "DEI" policies
- Cut federal funding/
Dismantle USED

Some actions taken by Administration

- Expand career pathways
- Expand school choice
- Expand "parents' rights"
- Restructure
postsecondary education
and student loans

Currently has little attention from Administration

- Restructure teacher
pay and tenure

Given the policies laid out in the playbooks, the Administration's messaging thus far, and the limitations on congressional action, we expect the administration to:

- Continue to double down on areas it has already greatly impacted (i.e. DEI, dismantling USED)
- And expand its focus on areas it has taken some action in (i.e. school choice and student loans).

The playbooks, messaging and viability of priorities, signal the Administration may expand its focus in a few policy areas next

What areas will Trump continue to focus on, and what do the policy playbooks signal what actions the Administration and Congress may take?

Cut federal funding/ Dismantle USED

- *Executive Action:* Some states are interested in receiving **more flexible funding from USED**. Converting Title I and IDEA funding to **block grants likely extends outside of USED's waiver authority**. However, some are worried reductions to USED's staff may limit their ability to scrutinize waiver requests, and if **one state is granted a waiver, it may serve as a template** for others.
- *Congressional Action:* Given the filibuster, it is **highly unlikely congressional action will be used to make statutory changes to Title I and IDEA** to change funding to block grants, given the partisan nature of these proposals. Likewise, because these are both **discretionary programs**, they are **not likely to be impacted by budget reconciliation**.

Expand school choice

- *Congressional Action:* Congress has proposed a number of bills to **expand federal school choice programs**. Though partisan legislation is subject to the filibuster, **budget reconciliation** - which only requires a simple majority - **could be used to pass a federal school choice tax credit**, because it is a tax provision.
- In particular, Congress could base a federal tax credit program on the **Educational Choice for Children Act (ECCA), which creates a 100% federal tax credit** for donations to private scholarship-granting organizations.

Restructure postsecondary education and student loans

- *Executive Action:* Trump recently issued an **EO limiting who is eligible for the Public Service Loan Forgiveness Program**; USED can make changes to eligibility by going through a **formal rulemaking process**.
- The SAVE repayment plan, defense to repayment regulations and closed school discharge repayment provisions are currently **under review by the courts**.
- *Congressional Action:* **Budget reconciliation** could also be used to make changes to **student loan and financial aid programs**, in particular affecting the College Cost Reduction Act, Saving on a Valuable Education (SAVE) Plan, loans for graduate students, Pell grants and higher education tax credits.



In Depth Review of Policy Playbook Proposals

*A summary of Executive and Congressional
actions to date*



Proposals & Actions: Rollback “DEI” policies

Policy Priorities

Cut federal funding to schools that “engage in inappropriate political indoctrination.” **Investigate DEI programs and rollback antidiscrimination protections** for LGBTQ+ students. Promote “**patriotic**” civics curricula.

Proposals from Policy Playbooks

Actions Taken

Eliminate federal funding and **investigate** schools that teach “**leftwing propaganda**” or engage in **DEI programs or affirmative action**

EO AND USED GUIDANCE ISSUED, INVESTIGATIONS OPENED: While Trump hasn’t explicitly banned diversity training at colleges and universities, he issued an EO stating **DEI policies and programs at higher education institutions can violate federal civil rights law.**

USED then issued a Dear Colleague Letter, asserting any **schools engaging in illegal DEI activities may have their funding revoked.** A follow up letter requested SEAs to certify their districts do not engage in DEI activities.

The administration also **threatened and implemented funding cuts at universities** if they do not comply with anti-DEI mandates (i.e. Harvard, Columbia). OCR opened **Title VI investigations against 52 universities** for administering **race-based programming and scholarships.**

Separately, Trump also issued an EO seeking to **eliminate “behavior modification techniques,”** which the Administration defines as “any school discipline policies or practices that incorporate or are **based on discriminatory equity ideology.**”

LEGISLATION PROPOSED: In Congress, a bill proposed in the House would **amend the HEA by prohibiting federal funding** for institutions of higher education that **carry out DEI initiatives.**

Proposals & Actions: Rollback “DEI” policies (cont’d)

Policy Priorities

Cut federal funding to schools that “engage in inappropriate political indoctrination.” **Investigate DEI programs and rollback antidiscrimination protections** for LGBTQ+ students. Promote “patriotic” civics curricula.

Proposals from Policy Playbooks

Actions Taken

Roll back Biden’s new **Title IX protections for LGBTQIA+ students** in both K12 and college

USED GUIDANCE ISSUED: USED issued a Dear Colleague letter stating enforcement of Title IX is now based on provisions of the 2020 Title IX rule, **rolling back Biden-era protections for transgender students**. Even though the letter doesn’t carry the force of law, it demonstrates how OCR will approach Title IX investigations.

Propose an executive order to “cease all [federal] programs that promote the concept of **sex and gender transition**”

EO ISSUED: Trump signed an EO establishing a federal policy **recognizing only two sexes** and asserting **federal funds should not be used to promote gender ideology**.

Revoke Biden’s executive order about racial equity in federal programs (EO 13985)

EO ISSUED: On his first day in office, Trump signed an EO that **rescinded ~80 EOs and Presidential Memos issued during the Biden administration**, including EO 13985.

Proposals & Actions: Rollback “DEI” policies (cont’d)

Policy Priorities

Cut federal funding to schools that “engage in inappropriate political indoctrination.” **Investigate DEI programs and roll back antidiscrimination protections** for LGBTQ+ students. Promote “**patriotic**” civics curricula.

Proposals from Policy Playbooks

Actions Taken

Explicitly allow or issue **guidance supporting prayer** in schools

SOME EXECUTIVE ACTION: Trump has **not explicitly issued guidance supporting prayer**, but he did sign an **EO to eradicate “anti-Christian” bias** in the federal government and private conduct.

LEGISLATION INTRODUCED: A bill was introduced in the House that would **prohibit USED from providing funding for public schools that restrict voluntary school prayer**.

Reinstate the 1776 Commission, which advocated for civics education that “promote[s] love of country”

EO ISSUED: In his “Ending Radical Indoctrination in K-12 Schooling” EO, Trump **reinstated the 1776 Commission** within USED and called on relevant agencies to “**promote patriotic education.**”

Proposals & Actions: Cut federal funding/Dismantle USED

Policy Priorities

Eliminate the U.S. Department of Education and devolve education authority to the states.

Proposals from Policy Playbooks

Actions Taken

Dismantle USED and redistribute its departments among other agencies

EO ISSUED: Trump issued an **EO calling for the dismantling of USED**. The Department also announced a “final mission,” initiating a **reduction in force** impacting nearly 50% of USED’s workforce. **Funding cuts** have been made to IES grants, teacher and leader preparation grants, Regional Education Laboratories, Comprehensive Centers, Equity Assistance Centers and the NAEP assessments for 17-year olds.

LEGISLATION INTRODUCED: Bills have been introduced in the House and Senate to **terminate USED**. However, **legislation is unlikely to pass** given Republicans cannot override a filibuster in the Senate.

Convert Title I and IDEA to state block grants, and gradually **eliminate Title I** over 10 years

NO EXECUTIVE ACTION YET: Iowa and Oklahoma **requested federal funding flexibility through block grants**, but the request likely extends outside USED’s waiver authority.

LEGISLATION INTRODUCED: A proposed Senate bill would **allow states to receive federal block grants** if they submit data to the Treasury Department, complete an annual audit and follow civil rights laws. The bill would also eliminate USED and repeal ESSA.

Proposals & Actions: Expand career pathways

Policy Priorities

Expand **schooling that prepares students for jobs and careers**. Support “proven career training programs” and project-based learning.

Proposals from Policy Playbooks

Actions Taken

Increase **federal funding dedicated to Career and Technical Education (CTE)** programs and **workforce readiness**

EOs ISSUED: Trump issued an EO to **advance AI education for youth** by promoting **AI skills training and work-based learning** and AI education for K-12 students. A second EO aims to develop a **worker investment and development strategy**, **expand registered apprenticeships** and **improve transparency on performance outcomes** for workforce development programs.

SOME LEGISLATIVE ACTION: The House Education and Workforce Committee held a **WIOA reauthorization hearing** where **lawmakers expressed bipartisan support** for reauthorizing this major workforce development law. A **reauthorization bill has not yet been proposed**. **No action** has been taken to **reauthorize Perkins**, which provides funding and guidelines for CTE.

Bills proposed in the House and Senate would establish a competitive grant to fund **youth mentoring programs** that in part support **workforce readiness**.

Expand and increase funding for **federal apprenticeship programs** for youth

EO ISSUED: Trump issued an EO to **advance AI education for youth**, which in part seeks to **promote AI-related Registered Apprenticeships**.

LEGISLATION INTRODUCED: A proposed Senate bill would promote the development of and access to **apprenticeships and pre-apprenticeships for secondary school students**.

Proposals & Actions: Expand school choice

Policy Priorities

Offer **universal school choice**, such as via **education savings accounts (ESAs)**, and ensure private and homeschooling options are included as schools of choice.

Proposals from Policy Playbooks

Actions Taken

Increase federal funding to private, parochial and homeschools to **expand school choice**

EO ISSUED: A Trump EO calls on USED to issue guidance on how **states can use federal formula funds to support school choice initiatives**, and to include **education freedom as a priority** in discretionary grant programs. USED has since issued guidance explaining how existing flexibilities in ESEA allow **states to use up to 3% of Title I funds for direct student services** that “allow parents to exercise a meaningful choice in their child’s education.”

LEGISLATION INTRODUCED: Many bills have been proposed to expand school choice at the federal level. This includes proposals to **fund school choice for disadvantaged students**, students with **disabilities**, and students of **military families**; **amending the tax code** to allow tax credits for donations to education scholarships; and **increasing limits on 529 plans**.

Incentivize the creation of **state-level ESA programs**

NO EXECUTIVE ACTION YET: Trump has **not used executive action to incentivize state-level ESA programs**.

LEGISLATION INTRODUCED: Legislation introduced in the Senate and House would offer states a **50% tax exemption on bond interest income for local projects if they adopt school choice laws**. States “fully embracing school choice” will receive complete tax exemption.

Proposals & Actions: Expand “parents’ rights”

Policy Priorities

Create a **Parents' Bill of Rights** and give parents the power to elect principals and review school spending.

Proposals from Policy Playbooks

Establish a **Parents' Bill of Rights**, including mechanisms for parental involvement in school governance and oversight

Actions Taken

SOME EXECUTIVE ACTION: Trump has not issued an EO to establish a Parents’ Bill of Rights, but in his “Ending Radical Indoctrination in K-12 School” EO, he does direct secretaries of various agencies to **create recommendations to protect “parental rights.”**

LEGISLATION INTRODUCED: Bills proposed in the House and Senate “seek to **protect the rights of parents** to direct the upbringing of their children as a fundamental right.”

Proposals & Actions: Restructure postsecondary education and student loans

Policy Priorities

Establish a new accreditation body so that colleges and universities are no longer spaces of “radical left indoctrination.” **Create a new online national university.** **Restrict loan forgiveness** programs.

Proposals from Policy Playbooks

Halt all the loan forgiveness programs begun under Biden

Actions Taken

EO ISSUED: Trump issued an EO that **narrows who is eligible for the Public Service Loan Forgiveness Program**, limiting the Biden administration’s expansion of who qualifies for the program.

Separately, it is likely Biden’s **SAVE repayment plan** will be **struck down in the courts**. Biden’s borrower defense to repayment and closed school discharge repayment provisions are also under review by the courts.

LEGISLATION INTRODUCED: Legislation has been introduced that would **limit USED** from proposing or issuing regulations and executive actions **related to federal student aid programs**. Another would **bar students convicted of offenses** during campus protests from **receiving Federal student loans or relief**.

Proposals & Actions: Restructure postsecondary education and student loans (cont'd)

Policy Priorities

Establish a new accreditation body so that colleges and universities are no longer spaces of “radical left indoctrination.” **Create a new online national university.** **Restrict loan forgiveness** programs.

Proposals from Policy Playbooks

Fire “radical Left accreditors” and **restructure the college accreditation system**, through a modification of the Higher Education Act (HEA)

Establish and fund the **American Academy**, a national online university that will provide a free education and grant credentials all federal agencies and contractors must recognize

Actions Taken

EO ISSUED: Trump issued an EO to reform accreditation by holding **accountable accreditors that require institutions to engage in DEI initiatives** and focusing accreditation on **high-quality, high-value-academic programs** that promote credential and degree completion.

SOME LEGISLATIVE ACTION: A proposed House bill would **amend the HEA to “prohibit political litmus tests”** in higher education accreditation. Another set of bills proposes amending the HEA to **allow states to establish alternative accreditation systems.**

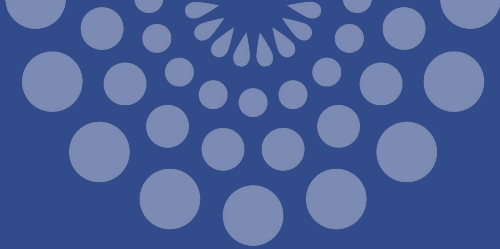
NO EXECUTIVE OR LEGISLATIVE ACTION YET: The president and Congress have **not proposed any plans to establish and fund the American Academy.**

Proposals & Actions: Restructure teacher pay and tenure

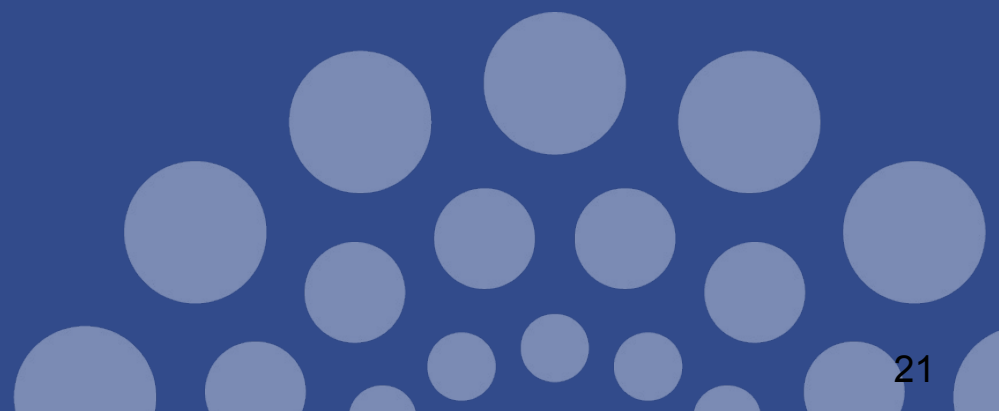
Policy Priorities

Eliminate teacher tenure and establish a **new credentialing system** to control teacher ideology.
Establish **merit pay** to encourage high-quality teachers.

Proposals from Policy Playbooks	Actions Taken
Establish merit pay for teachers	<p>NO EXECUTIVE OR LEGISLATIVE ACTION YET: Trump has not yet provided any incentives to establish teacher merit pay. In fact, ED froze the Teacher and School Leader Incentive Program, which helped districts give performance-based financial incentives to teachers and principals.</p> <p>Congress has also not proposed to modify any federal grant programs to establish merit pay for teachers.</p>
Eliminate teacher tenure and create a new teacher credentialing system	<p>NO EXECUTIVE OR LEGISLATIVE ACTION YET: The president and Congress have not proposed any plans to eliminate teacher tenure or create a new credentialing system to certify teachers “who embrace patriotic values.”</p>



Appendix



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