

Inside Project 2025

Blueprint to undermine safeguards against abuses of executive power



By James Goodwin
Policy director at Center
for Progressive Reform

PERSPECTIVE

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purported to create a “regulatory budget” scheme that prohibited agencies from issuing a new rule unless they first repealed two existing rules and ensured that the resulting cost savings offset any costs the new rule might impose.

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.

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purported to create a “regulatory budget” scheme that prohibited agencies from issuing a new rule unless they first repealed two existing rules and ensured that the resulting cost savings offset any costs the new rule might impose.

Contemporary elites have even repurposed the worst ingredients of 1970s “radical chic” to build the totalitarian cult known today as “The Great Awakening.”

partnerships with local organizations, including faith-based organizations (FBOs).
should be dismantled and merged with other agencies, privatized, or placed under the control of states and territories.

And despite its gauzy rhetoric, the federal budget is not even close to the worst example of this corruption. The entire federal budget belongs to the “Administrative State.”

Dismantle the administrative state and return self-governance to the American people.

Quotations from Project 2025's Mandate for Leadership are seen in the background of an image of Heritage Foundation President Kevin Roberts.
GAGE SKIDMORE/WIKIMEDIA COMMONS

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 the Mandate for Leadership, published in April last year, sets out a comprehensive blueprint in technocratic detail. It is the product of a broad coalition of ultraright-wing think tanks and advocacy organizations. It covers nearly every pol-

icy 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 ulti-

mate goal: to reprogram the US administrative state to support and sustain arch-conservative rule for decades to come. The distinguishing features of this regime would include a far more politicized bureaucracy, immunity against meaningful public or congress-

ional 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.

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.

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 American 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 the 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, the 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. Cur-

rently, 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, the 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.