

The flip side of silencing or firing career public servants is to empower extremists and amplify outlier viewpoints — a move the 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 in assigning security clearances, ensuring loyal voices are heard loud and clear when it comes to conducting intelligence assessments to inform national security decisions.

The 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”. The mandate fails to specify what constitutes a proper channel, but the broader context of the recommendation indicates a hostility toward the indepen-

dent 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 US energy systems. The information products that the EIA generates are crucial for informing energy-related policy-making 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 pri-

vatzation 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. The 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 payroll 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, the Mandate for Leadership advocates for politicizing existing relationships with contractors. Its chapter on the US 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 US-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, the 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, the 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 Mandate for Leadership also contains several recommendations for how agencies could weaponize federal grant-making 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. The 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 the 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 US 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. The 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 at consolidating and strengthening enforcement policies at US 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. The mandate would permit these procedures to be applied to individuals more than 100 miles from the US-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. The 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 the Mandate for Leadership plays out for it.

The Mandate for Leadership’s final set of tactics for hijacking the administrative state has 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 of 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.



An enlarged silhouette of the Republican presidential candidate former president Donald Trump appears on the American flag at a campaign event in Waukesha, Wisconsin, in May 2024.
● BRIAN SNYDER/REUTERS

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.

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 US 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.

The full article first appeared on Boston Review.



An information booth for Project 2025 is seen at CPAC in National Harbor, Maryland, on February 23, 2024.
● MICHAEL BROCHSTEIN/SIPA USA