



# FROM PROJECT 2025 TO PROJECT 2029:

**How We Resist an Authoritarian Takeover  
and Turn Public Administration into a Force for Equity and Justice**

## Why This Toolkit?

Project 2025 poses a profound authoritarian threat to democratic governance and our vision of a just, equitable, and multi-racial democracy. This threat will endure regardless of the 2024 election outcome. It is part of a broader concentrated attack, including from the courts, on the federal agencies that serve to protect our rights, advance equity, and provide public goods, services, and infrastructure. It is also a backlash against agencies' growing attention to racial inequities. Project 2025 plans to dismantle the core democratic and increasingly equitable functions of public administration and turn agencies into instruments of repression, with disastrous consequences for communities of color, workers, immigrants, middle- and working-class families, women, and LGBTQ+ people.

Project 2025's white nationalist and Christian fundamentalist worldview promotes far right policies on race, immigration control, unfettered markets, gender and family life in a 900-page blueprint for the next conservative president. But it is Project 2025's call to "deconstruct the administrative state" that points to a fact we ignore at our peril: without democratic, accountable institutions to implement our policies and enforce our rights, we cannot build the just society we envision. When we push transformative policies to advance equity and justice, we depend on systems of public administration capable of turning those policies into equitable and just realities.

To prepare our resistance to an authoritarian takeover, we share strategies that can help block a far right power-grab. Organized groups behind Project 2025, led by the Heritage Foundation, have invested \$22 million in mass recruitment, vetting, and training of right-wing sympathizers. We can expect far right mobilization to continue beyond this election cycle, so long as our democracy is perceived to be failing.

To counter the far right threat in the long run, we must address and eliminate the injustices that fuel authoritarianism and fail our multiracial democracy. We must build governing power and create a coherent and compelling vision for the role of government, and specifically public administration, in advancing equity and justice. With this toolkit we seek to plant seeds for a collective Project 2029 driven by the movement for a multiracial democracy.

## What We Do in This Toolkit

- ***We show that Project 2025 does not seek a smaller government, but a more centralized one, with unchecked repressive powers.*** It selectively targets and eliminates federal offices that protect rights, advance racial and other equity, and provide public goods. Where it cannot abolish an office, it turns it against us. Civil rights offices would police our bodies and punish the pursuit of racial justice.
- We do not defend the status quo, because this crisis cannot be solved through constitutional checks and balances or good governance reforms. ***The best way to protect administrative democracy is to make it deliver on the promises of equity and justice for all.*** A government that delivers for all people and closes racial and other equity gaps eliminates the appeal of authoritarian fixes. For this reason, we imagine in this toolkit what administrative institutions would look like that can advance our collective goals, and we review progress made in recent years.
- ***We call on movement groups – and on the next president – to take action.*** Both can act to entrench and expand pathways to equitable governance. Movement groups can support the communities, unions, and workers' centers most under threat by Project 2025. They can exercise countervailing power to protect the progress we made and to push for the reforms we need to turn public administration into a force for equity and justice.

## Who This Toolkit Is For

**We hope to support and inspire social movement groups to help shift the narrative about what public administration is, and what it can be.** While we know that government produced or maintained the racial inequities we see today, it can also be a key part of the solution. Together we can use our strategic imagination to deepen administrative democracy and make it deliver for all people. We also hope that movement groups will claim administrative processes as a democratic space, an opportunity to build and exercise governing power. Administrative democracy provides a terrain of political struggle that we should not cede to authoritarian and corporate forces.

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# MAKING THE CASE: WHY ADMINISTRATIVE DEMOCRACY MATTERS

Every agenda for social transformation in the United States must engage with the federal administrative branch. Administrative powers can be exercised democratically and equitably, or they can serve autocratic rule. Public administration can protect our rights, advance racial and other equity, and provide material benefits, or it can become an instrument of repression and exclusion. The administrative branch is a terrain of struggle that we cannot afford to cede to the authoritarian forces behind Project 2025.

## Why Is the Administrative Branch of Government Important?

The federal administrative branch is the arm of government that does the things we rely on every single day. It ensures that our tap water is clean, our food and medicines are safe, our roads are usable, our retirement checks arrive on time, our voting rights are protected, we can organize at the workplace, and we get Medicare when turning 65. Our quality of life depends on public agencies preventing systemic harms and providing public goods, services, and infrastructure to meet our needs.

How well public administration does these things and whether we close racial and other equity gaps so that we all benefit depends on how these institutions operate. Are they set up to meet their purpose? Are they guided by principles such as equity, dignity, and justice? Do they have the support and expertise needed to understand institutional racism? Are they responsive to us, the people, or to narrow, well-resourced interests? Do they have the capacity, staff, and resources to do their job?

The answers depend on who has the power to decide. Will it be the groups behind Project 2025, whose proposals would deepen inequity and strip us of basic protections and rights, or will it be people fighting for justice, equity, and a multi-racial democracy?

## How We, The People, Shape Administrative Democracy

When a modern system of public administration was developed in the early 20th century, it was charged with regulating industries to protect workers and consumers from harm. When the New Deal expanded public administration, it was tasked with delivering social security benefits and other public programs. But, like Congress and the courts, administrative systems also had a role in sustaining white supremacy and structural inequities, from redlining neighborhoods to denying federal loans to Black farmers.

Generations of movements have deployed administrative advocacy alongside legislative and judicial strategies to win the capacities that Project 2025 seeks to dismantle: the Civil Rights Act and its enforcement apparatus, the Voting Rights Act and the administration of free and fair elections, the Clean Air Act and the regulation of toxic emissions in Black and Latino/a neighborhoods, and the National Labor Relations Act with a Board that enforces the right to collective bargaining.

### **Advance Equity:**

Movements have always shaped public administration and marshalled its powers for rights, equity, and justice.

*“My key takeaway from serving in a federal agency is that you can only do something meaningful in government when organized groups are pushing and making their case about who this is going to hurt, who is it going to help.”*

**RAJESH NAYAK**

former Assistant Secretary for Policy, Department of Labor

Yet administrative processes are not always easy to see or comprehend. Many protective rules only become visible when they fail, like an oil spill or lead in drinking water. When government exercises force, however, through the police, border control, or carceral system, it can seem omnipresent, especially for communities of color. Most administrative processes are burdensome and send people through a maze of paperwork, like tax returns. Some procedures, like applications for food or housing assistance, are designed to deter people from seeking the services they are entitled to. Other public benefits, disproportionately going to wealthier, white people, are hidden in the tax code, which deliberately obscures the supportive role of government, as does the privatization of public services. While people’s experiences of public administration differ, depending on their race, class, gender, and other factors, almost everyone lacks opportunities for shaping what the federal government does. When government appears as a black box, the far right can stoke and exploit people’s distrust and powerlessness.

## **How Neoliberalism Hollowed Out Government, Rolled Back the Civil Rights Movement’s Progress, and Prepared the Terrain for the Far Right**

The assault on public administration did not begin with Project 2025, nor is it likely to end there. In the [wake](#) of the Civil Rights Movement, which enshrined formal equal access to laws and public services, anti-government propaganda has proliferated, combined with attacks on the social safety net. Neoliberal policies, promoting the commercialization of everything, have hollowed out administrative democracy through privatization, disinvestment, and privileging corporate interests. This has contributed to growing inequality and precarity. Some federal agencies have been tasked with protecting powerful interests through massive criminalization and other abuses of Black and brown communities. Other agencies have been robbed of the means to respond to racial, economic, and social inequities.

The federal workforce is [now](#) just over [half the size](#) it was seventy years ago, measured as a percentage of the U.S. population. This means that the Occupational Safety and Health Administration (OSHA), whose role it is to make workplaces safer – particularly the low-wage jobs held disproportionately by people of color – lacks the staff to do so; and the Civil Rights Office at Department of Education, which receives thousands of complaints about discrimination each year, lacks the staff to resolve them in a timely manner. Project 2025 targets both of these offices for further defunding and downgrading. There is a bleak logic to this strategy: When government is unable to deliver for people, people become resentful and receptive to authoritarian “fixes”.

### **Shift the Narrative:**

For decades, public administration has been undermined and set up to fail. This makes it easier for authoritarians to take it over and turn it against our communities.

## The Administrative Branch as a Site of Struggle: How We Can Fight Forward and Win

Administrative institutions provide a democratic space, a site of contestation, struggle, and potential collaboration, where movements and communities can exercise and grow their governing power. When agencies make policy, funding, or enforcement decisions, they allocate resources, power, risks, and benefits. Whether this is done equitably can be influenced by organizing, advocacy, and building effective relationships.

*“Don’t cede the administrative terrain to well-resourced special interests that are opposed to what our communities need.”*

**CHIRAAG BAINS**

former Deputy Director and Deputy Assistant to the President, Domestic Policy Council, The White House

It is the job of the administrative branch to turn laws passed by Congress into realities on the ground. It can act relatively autonomously and is not merely an extension of the executive office of the president (which is why we use the term administrative, not executive, branch). Agencies draft regulations to implement laws, enforce these rules through investigations and adjudication, and decide on the distribution of investments and grants. They have the authority to issue rules to protect the public, like preventing workers’ excessive heat exposure, and to enforce those rules by ordering companies to remedy or end harm, like providing shade, water, and rest breaks. They also are an effective source of checks on presidential power.

Agencies have a range of policy levers at their disposal, and they act independently but not alone. There are formal and informal spaces for contribution, collaboration, and contestation. Many well-resourced, organized interests are very adept at influencing agencies and spend a lot of time and money doing so. For example, oil and gas companies are fluent in lobbying regulators, as is the financial industry. In contrast, movement groups tend to put more energy into envisioning big policy ideas than into implementing them. But when a policy passes, it is the administrative branch that can make or break its success. To ensure effective and equitable policy implementation, our advocacy and organizing must continue on the administrative terrain. If we stop engaging, we leave the administrative space uncontested and forgo opportunities for mobilization and for building the governing power we need to advance a multi-racial democracy.

Any strategy for engaging in the administrative space must account for the fact that government institutions are shaped by prevailing economic and social forces. This produces power disparities that make it harder for justice advocates to get heard. But when we broaden our organizing and advocacy from individual policies to institutional reforms, we can gain footholds in administrative governance. The historic *Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, issued in January 2021, exemplifies this. Institutional change, even in small steps, enables us to shift power and embed the goals of racial and other equity in the institutions themselves.

### **Exercise Countervailing Power:**

Don’t cede the terrain of administrative advocacy to corporate and far right forces – use it to mobilize and grow our governing power.

Our task of defending and democratizing public administration has two dimensions: to step up organizing, advocacy, and potential collaboration in the administrative space, and to do so in ways that realign administrative goals towards equity and justice and grow movement governing power. Movements who can influence the way agencies act and who can tap into the powers of administrative governance will be better positioned to shape outcomes on the ground.

*“How much power civil society groups have is not just a function of on-the-ground organizing but also a function of leveraging the governing power of state institutions.”*

**K. SABEEL RAHMAN**

former Associate Administrator (delegated the duties of the Administrator), Office of Information and Regulatory Affairs, Office of Management and Budget, The White House

## How We Can Turn the Administrative Branch into a Force for Equity and Justice

The administrative branch provides us with the capacities and capabilities to address structural racism and other inequities and injustices. Administrative institutions have the authority to protect civil rights and advance equity, rein in corporate power and collusion, invest in underserved communities, and enforce workers’ right to organize. These are the administrative powers that Project 2025 is attacking and that the far right’s remaking of the judiciary is beginning to chip away.

At the same time, administrative powers also extend into the domain of violence, where they are poorly constrained by legal or democratic guardrails. Administrative functions that use force to execute laws include immigration enforcement, border control, policing, and the carceral system. Project 2025 is ready to unleash those unchecked powers of state violence to expand control, policing, and punishment of communities of color, immigrants, women, LGBTQ+ people, workers, unhoused people and others living in poverty.

We should restrain coercive administrative functions while expanding those capacities we can leverage for the benefit of communities. Rather than merely defending public administration as is, we need to shift power and resources to the administrative functions we value. For example, we should get more funding to offices that protect consumers and workers but routinely get sued by corporations over rules like limiting credit card [penalty fees](#) or freeing 30 million rank-and-file workers, particularly people of color and women, from [non-compete agreements](#) and thereby reducing racial and gender wage gaps.

*“The question is not about small or big government, but about what state capacity is for. I hope advocates make a case for expanding parts of government that benefit communities and reining in those that burden communities.”*

**K. SABEEL RAHMAN**

former Associate Administrator (delegated the duties of the Administrator), Office of Information and Regulatory Affairs, Office of Management and Budget, The White House

We also need to infuse administrative goals and procedures with the principles of equity and justice. Too often, seemingly rational administrative processes, such as eligibility verification for Medicaid or applications for unemployment benefits, serve to control and exclude people – primarily people of color. But if we push agencies to refocus their powers on democratic purposes – adopt rules to protect everyone’s rights and provide services to meet everyone’s needs – their role in advancing racial and other equity becomes clearer. This is why administrative democracy is a target for far right attacks. By reclaiming public administration as a force for equity and justice, social movements can resist these attacks and build a system of governance that works for everyone.

**Shift the Narrative:**

The far right wants to control, not dismantle, the administrative branch and use it to repress us. To resist a takeover, we need to reclaim public administration and make it a force for equity and justice.



# MEET THE MOMENT: HOW PROJECT 2025 WOULD TURN GOVERNMENT AGAINST THE PEOPLE

## What Threats Does Project 2025 Pose to Administrative Democracy?

Backed up by a well-resourced operation prepared to take power, Project 2025 poses a real threat to the core of democratic governance. Its mass recruitment program has [trained](#) loyalists to take control of federal agencies and execute on extremist policies. This responds to a lesson learned during the Trump administration, which lacked the aptitude to make agency operations conform to right-wing aspirations. Project 2025's policies come with pre-drafted Executive Orders and vetted staff ready to show up on Day 1, end the independence of agencies and consolidate political control over public administration.

Contrary to conservative "small government" rhetoric, a Project 2025 regime would be aggressively authoritarian and concentrate power in the hands of the president. It would "take a firm hand to the bureaucracy and marshal its power" ([Mandate for Leadership: The Conservative Promise](#), p.873, hereinafter Project 2025) to create a potent and potentially abusive state. Far from "deconstructing" the administrative branch, it would take over institutions and repurpose administrative powers to serve white supremacist and Christian fundamentalist doctrines, along with corporate interests. To turn the federal bureaucracy into an instrument of autocratic rule, Project 2025's strategy includes:

- *delegitimizing* public administration, including through conspiracy theories,
- *undermining* agencies' capacity to deliver on people's needs and protect rights, while aggrandizing controlling and coercive capacities, and
- *centralizing* power through firing civil servants, ending administrative checks and balances, and limiting public participation and accountability.

## What Is Authoritarianism and Autocratic Rule?

An authoritarian system of governance, which Project 2025 threatens to impose, includes:

- Highly concentrated centralized power.
- Severely limited individual rights and freedoms.
- Repressive state control and violence targeted at specific population groups.
- Purging of dissent and ending political pluralism.
- Weakened separation of powers.
- Full central control and manipulation of administrative institutions, staffed with partisans and weaponized for political purposes.

Even in our formally democratic system, some authoritarian elements exist. State control has long targeted racially oppressed groups, thus subjecting some people to a different set of rules than others, resulting in [racial authoritarianism](#).

An authoritarian system is autocratic when unrestrained power is held by a single individual, such as the president, elevated by a cult of personality. **An autocratic president:**

- Personally controls the administrative branch and neutralizes or removes congressional and judicial oversight.
- Uses the federal bureaucracy as an instrument of personal will.
- Acts free from any checks and balances.

Modern autocratic rulers come to power through elections. Autocrats consolidate their power by:

- Claiming they embody the will of a unified people.
- Maintaining the shell of democratic institutions, but hollowing them out from within.
- Using existing laws to gradually dismantle the foundations of democratic structures.
- Undermining future elections to remain in office indefinitely.

## What Makes These Threats So Urgent and Dangerous?

Although Project 2025 is merely the latest version of a long running assault on federal administrative democracy, the stakes are higher now. The new far right agenda is calibrated to cause maximum harm to communities of color, people living in poverty, tribal nations, immigrants, women, and LGBTQ+ people. White nationalists, clamoring for a strong executive to thwart a multi-racial democracy, have joined forces with big business, seeking to rollback regulations that protect workers and consumers. As the ideology of unfettered markets merges with that of white power, it threatens heightened exploitation and repression. This is particularly painful because it comes at a time when administrative agencies can chalk up some real progress in advancing more equitable governance.

*“Project 2025 is a backlash against the administrative state’s expanded focus to not only better regulate big business but doing so to the benefit of communities that have long been exploited, oppressed, and dumped on.”*

**MATTHEW TEJADA**

former Deputy Assistant Administrator for Environmental Justice, Office for Environmental Justice and External Civil Rights, EPA

## How Would Project 2025 Impose Its Authoritarian Agenda?

- Project 2025 has a package of bills ready to switch the administrative branch to autocratic rule, assuming they find support in Congress. This includes expanding presidential powers and abolishing or defunding those parts of government the far right does not like, such as offices that enforce consumer rights or help address climate change.
- A far right administration might also try to refuse spending money appropriated by lawmakers if Congress is unsupportive. A [Project 2025 partner](#) organization advocates for withholding or “impounding” funds, a practice banned since abuses by the Nixon administration.
- In the courts, Project 2025 can reap the benefits of a long-term legal strategy targeting the administrative branch. Recent Supreme Court rulings have shifted some rulemaking powers from agencies to judges. In their *Loper Bright Enterprises v. Raimondo* decision, a highly compromised Supreme Court under the cloud of ethics allegations gave itself the final say on the best way to implement policies passed by Congress. For example, going forward, judges, not agency scientists, may decide how much air toxics can be emitted safely.

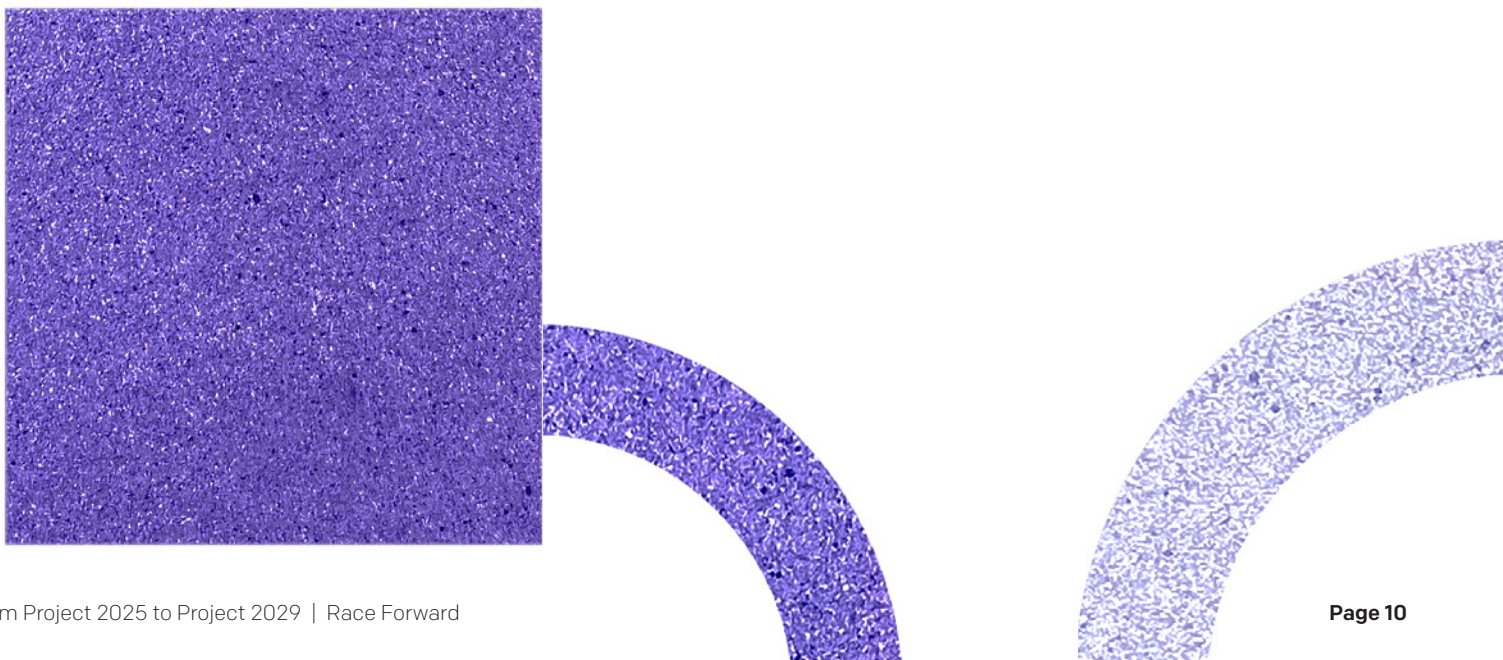
The administrative branch itself will be a prime site of struggle, and movement groups can engage strategically on this terrain. While some administrative policies, such as Executive Orders, can be easily reversed, it will take time, effort, and contestation to undo final regulations. Organized resistance and advocacy can stall or stop administrative power-grabs.

## Project 2025's Administrative Power-Grab and How It Would Harm Our Communities

### Project 2025 Would Replace Civil Servants with Loyalists

Project 2025's core strategy for immediately taking control of the administrative branch is to replace or reshuffle many of the civil servants who make our government run. Around 2.2 million civilian federal workers – from nurses who treat veterans to scientists who investigate food safety – embody and protect administrative democracy. Grounded in their oath of office, civil servants are the experts who tell political appointees whether a policy proposal is based on evidence, what its pros and cons are, what impacts to expect, and how it can be implemented. If the far right guts the civil service and gains control over the federal workforce, it will control what government does, whom it serves and how it works.

- Project 2025 would revive Schedule F, a controversial policy introduced by President Trump and revoked by the Biden-Harris Administration. Schedule F would reclassify at least 50,000 civil servants, making them at-will employees that can be easily fired for political reasons. Project 2025's database would quickly move their political loyalists trained to undo equity reforms into those positions. This would take the federal workforce back to the 19th century, before professionalized hiring replaced the corrupt spoils system. Although the Biden-Harris Administration took preemptive action by finalizing a [rule](#) that reinforces civil service protections, this rule could, in time, be reversed. A partisan workforce would end internal checks and balances and severely undermine public accountability.
- Project 2025 would curtail federal workers' rights to organize and collectively bargain. Their ultimate goal is to prohibit all public sector unions (*Project 2025*, p.82).
- Project 2025 proposes reassigning or relocating federal workers, including shuffling Senior Executive Service staff, which would severely disrupt agency operations. Also planned is the forced relocation of agencies, such as the Environmental Protection Agency. When the U.S. Department of Agriculture was relocated by the Trump administration, its operations took years to recover. Similarly, the EPA would likely be decimated, gutted of experts, and too debilitated to do its work. Its Office of Environmental Justice and External Civil Rights would be abolished as a stand-alone office. Bringing environmental protection and justice work to a standstill is the point of this strategy. For the foreseeable future, it would give industry a green light to pollute the air we breathe, the water we drink, and the food we eat, and it would fuel environmental injustices that threaten the lives of communities of color.



## Project 2025 Would Shift Administrative Capacity From Protective to Coercive Functions

Project 2025 pursues a dangerous mix of deregulation on the one hand and extreme concentration of coercive state power on the other. Taken together, this would maximize harm for communities of color, immigrants, people living in poverty, and women. Where communities have made recent gains, for example by strengthening workers' rights and environmental justice, Project 2025 takes a deregulatory approach to remove the protective rules issued by agencies. But where communities are vulnerable to repressive state powers, Project 2025 gives agencies free rein and resources. It would empower government to go after immigrants, attack reproductive rights, and discriminate against LGBTQ+ people. This would produce a massive shift in state capacity away from those parts of government that protect and provide and toward those that coerce and control.

*“Project 2025 is the worst kind of small government, leaving us vulnerable to big corporations, polluters, and discriminators, and it's the worst kind of big government, leaving us vulnerable to the unchecked power of the state to go after civil rights, women's rights, and immigrants' rights.”*

**K. SABEEL RAHMAN**

former Associate Administrator (delegated the duties of the Administrator), Office of Information and Regulatory Affairs, Office of Management and Budget, The White House

- Project 2025 would aggrandize and concentrate repressive state power: It would establish a massive new border and immigration department, with more than 100,000 federal workers, making it “the third-largest department measured by manpower” (*Project 2025*, p.133). This government function has always been institutionally racist, disproportionately targeting immigrants of color.
- Project 2025 would abolish or weaken offices that have proactively used their authority to protect people: The Office of Environmental Justice, the Consumer Financial Protection Bureau, the Equal Opportunity Employment Commission (EEOC), and the National Labor Relations Board (NLRB) would be either eliminated or stripped of the staff, tools, and authorities they need to function.

### **Administrative Sabotage:**

- When the EPA loses its scientific staff – to defunding, relocation or politicizing science (*Project 2025*, pp. 422, 436, 437) – it will lack the capability to measure and control pollution, which will collapse the system of environmental protection.
- When the NLRB's enforcement activities are turned against unions – by requiring the board to go after union leadership (*Project 2025*, p.600) and making it easier to decertify unions (*Project 2025*, p.603) – the board can no longer fulfill its statutory mission to protect workers' right to organize.
- When OSHA's inspection mandate is limited to focusing on big offenders (*Project 2025*, p.615), and its staffing levels further reduced – in 2019 it would have taken [162 years](#) for OSHA to inspect each workplace under its jurisdiction – it can no longer oversee our health and safety at work.

These planned Project 2025 actions amount to what some have called administrative sabotage. They are not just shirking the duties delegated by Congress but deliberately nullifying agencies' statutory functions, with hugely harmful consequences. Sabotaging agency action means favoring industry over communities, banks over consumers, and management over workers. This would have devastating and disproportionate impacts on communities of color, who suffer the lion's share of pollution, predatory lending, wage theft, and workplace injuries. Combined with concentrating the state's repressive powers, this is a deeply racialized and gendered strategy. It increases the freedoms of some, such as big business and white nationalists, at the expense of others, whose bodies are policed and whose rights are violated.

## Project 2025 Would Gut Civil Rights Protections and Prohibit Efforts to Advance Racial and Other Equity

Project 2025 is upfront about abandoning and even prohibiting the pursuit of racial and other equity. It vilifies and distorts the concepts of diversity, equity, and inclusion and turns them into thinly veiled racist insults, suggesting they create “favored” groups. It bans the very language of equity, gender, sexual orientation, and many other terms from government documents and activities (*Project 2025*, p.4). It would shutter equity and gender offices and fire staff engaged in racial and other equity trainings or initiatives (*Project 2025*, p.708). The Department of Justice (DOJ) would be stripped of its independence, brought under political control, and tasked with enforcing the eradication of racial and other equity efforts across government. This would have broad repercussions for all agencies, given that the Biden-Harris administration introduced a whole-of-government approach to advancing equity, and directly harm communities of color, LGBTQ+ people, and many others.

- By forcing the DOJ’s Civil Rights Division to lead the equity purge (*Project 2025*, p.562), the government’s civil rights functions would be turned against people of color, gaslighting racial justice efforts as discriminatory.
- By prohibiting the use of “disparate impact” in assessing discrimination (*Project 2025*, pp.335, 583), agencies could no longer bring civil rights enforcement cases that measure discrimination by results rather than intent. Communities facing systemic discrimination in housing or education would lose access to key legal strategies in their fight for justice.
- By forcing the DOJ to abandon investigations into patterns of discrimination (*Project 2025*, p.557), including in policing, and drop its lawsuits against voter suppression in states like Georgia and Texas (*Project 2025*, p.546), many hard-won protections in the Civil Rights Act and the Voting Rights Act would be rendered meaningless.

### Agencies and Offices to Be Eliminated or Incapacitated under Project 2025:

- Department of Education and Title I funding for low-income schools
- Head Start Office and Program
- Consumer Financial Protection Bureau
- Office of Environmental Justice and External Civil Rights at the EPA
- Office of Clean Energy Demonstrations at the Department of Energy
- National Oceanic and Atmospheric Administration
- Gender Policy Council at the White House
- Office of Domestic Climate Policy at the White House

### Agencies and Offices to Be Defunded, Split, or Constrained under Project 2025:

- Department of Labor
- Department of Housing and Urban Development
- Environmental Protection Agency
- Federal Reserve
- Internal Revenue Service
- Federal Emergency Management Agency
- Centers for Disease Control and Prevention

- By prohibiting the EEOC from collecting racially disaggregated data (*Project 2025*, p.583), providing guidance and technical assistance (*Project 2025*, p. 586), and by reorienting enforcement toward discrimination based on religion (*Project 2025*, p. 587), racial discrimination in employment would remain undetected and unaddressed, leaving workers of color to fend for themselves.
- By requiring the Offices for Civil Rights in the Department of Health and Human Services and in the Department of Education (which *Project 2025* seeks to abolish) to pursue race discrimination claims against anti-racism efforts (*Project 2025*, p.495), to stop all guidance, investigations, and enforcement relating to discrimination on the basis of sexual orientation and gender identity, to define “sex” as “a fixed biological fact” (*Project 2025*, p.334), and to disclose women’s health information to law enforcement (*Project 2025*, p.497), the administrative system would be forced to promote rather than prevent discrimination.
- By eliminating all equity assessments and action plans, agencies would no longer be able to uncover hidden discrimination in the way the Internal Revenue Service [discovered](#) through a racial equity audit in 2023 that it had disproportionately audited Black taxpayers.

### **Project 2025 Would Increase Barriers to Public Participation in the Administrative Branch**

Project 2025’s policies clearly favor regulated industries over regulatory beneficiaries. To ensure that those biased policies prevail, it seeks to deter public participation in rulemaking and other administrative actions.

- *Community outreach and engagement programs would disappear*, just as public agencies have begun to work more proactively with disadvantaged communities. The EPA’s Office of Public Engagement would be eliminated (*Project 2025*, p.421), along with programs that help regulators meet with communities and bring lived experiences into administrative processes. For example, when the EPA strengthened emission standards for the air pollutant ethylene oxide, it [engaged directly](#) with over twenty at-risk communities. This resulted in a rule – which right-wing lawmakers seek to reverse – that will significantly reduce cancer risks in neighborhoods near commercial sterilization facilities, which are disproportionately home to people of color.
- *Negotiated rulemaking at the Department of Education would be eliminated* (*Project 2025*, p.440). Such negotiations have brought higher education stakeholders together to develop rules in a consensus-based process.
- *Federal grantmaking to community groups would be curtailed*. Technical assistance for applicants would be terminated or redirected. The EPA grants office would be taken over by a political appointee (*Project 2025*, p.444) and stop all grants to “advocacy groups” (*Project 2025*, p.422), including groups committed to racial justice and equity. Funding from the Inflation Reduction Act (IRA) would be rescinded or, at a minimum, ended for “nonprofits” (*Project 2025*, pp. 365, 424) and possibly clawed back. If the IRA and other clean energy investments were repealed entirely, we would [lose 1.7 million jobs](#), emit around 3 billion tons of extra greenhouse gases by 2030, and cause thousands of additional premature deaths due to worsened air pollution.
- *Community monitoring would be revoked*. The EPA introduced third party monitoring in its recent [rule](#) to reduce methane pollution from oil and gas operations. The new Super Emitter Program allows [certified third parties](#) to report large methane leaks. This has opened doors for communities to partner with environmental groups in investigating local oil and gas pollution. Project 2025 would end third party monitoring (*Project 2025*, p.424).

By restricting public engagement, Project 2025 privileges corporate voices over people's well-being and the common good. When political power is severely tilted toward the narrow interests of those at the top, administrative democracy is put at risk, with devastating consequences for the people it is tasked to serve. Communities of color would once again be excluded from key decision-making processes and denied the protections and services they need.

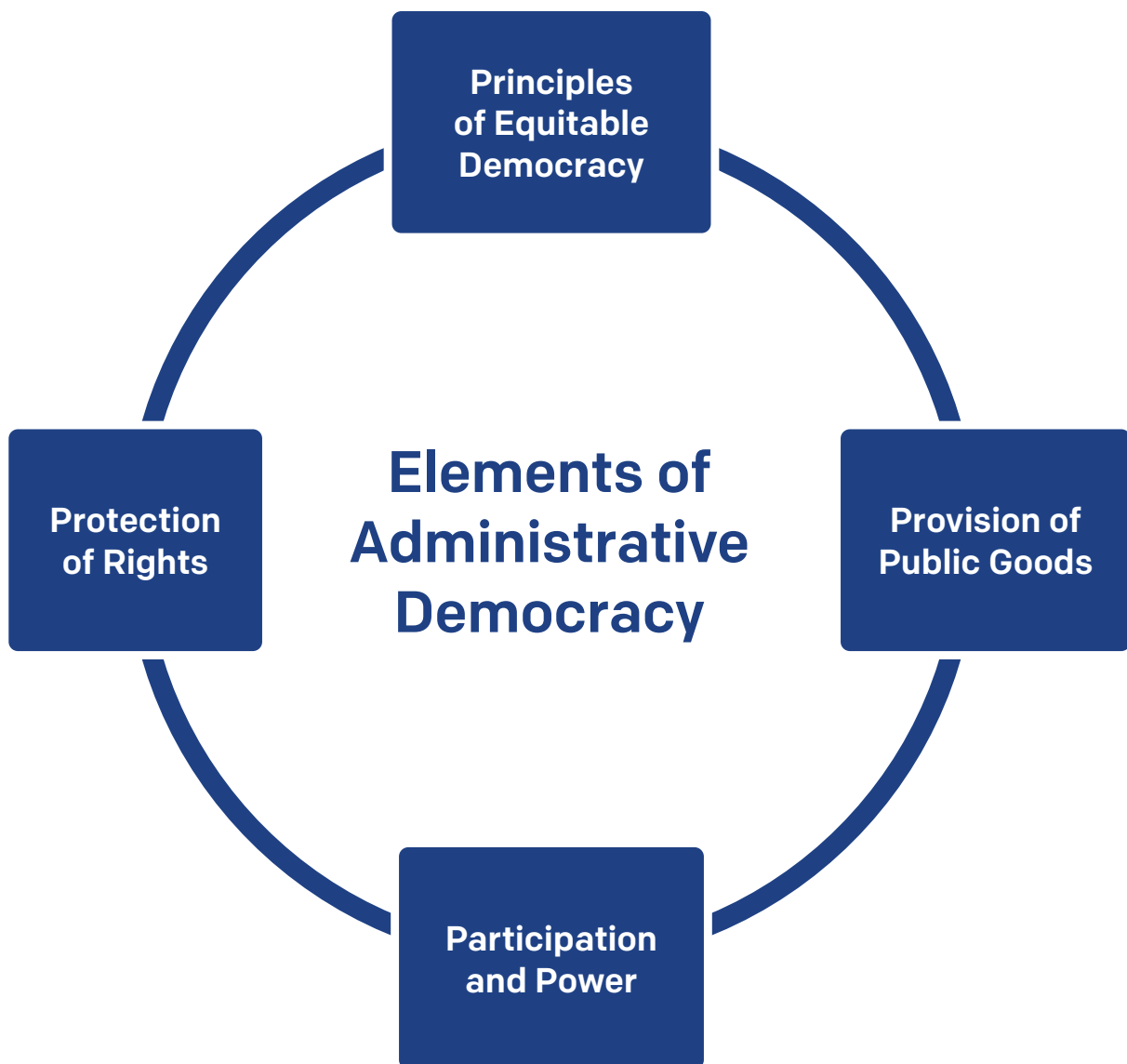
## **Project 2025 Would Turn Government Against the People By:**

- **Using public administration as an instrument of repression and autocratic rule.**
- **Directing repressive state powers disproportionately against communities of color.**
- **Firing independent civil servants and banishing their unions.**
- **Boosting a bureaucracy that controls and punishes.**
- **Busting agencies that protect our rights and freedoms.**
- **Prohibiting racial and other equity efforts.**
- **Turning civil rights offices against people of color, women, and LGBTQ+ people.**
- **Privileging corporate interests over the common good.**

# PROTECT AND PUSH:

## HOW PUBLIC ADMINISTRATION CAN SERVE AS A FORCE FOR EQUITY AND JUSTICE

Administrative power, like other state powers, has had a role in perpetuating our society's racial and other inequities and injustices. And yet, throughout history, movements have also deployed it in the service of rights and freedom. The Civil Rights Movement pushed federal agencies to help desegregate schools and hospitals, and it embedded civil rights enforcement in federal agencies. More than half a century later, can we imagine an administrative branch that finally fulfills the promise of advancing equity, protecting our rights, meeting our needs, and rebalancing power? If we can close racial and other equity gaps and make government work for everyone, we will fortify it against authoritarian attacks.





### **Imagine: Administrative Governance Is Democratic and Delivers Equitable and Just Results**

**Pathway:** *Embed democratic principles and power-shifting into administrative systems and processes*

If government is to work for everyone and be inclusive of communities of color, its administrative systems must operate democratically and serve democratic principles such as freedom, dignity, justice, and equity. This means federal agencies must facilitate inclusive and meaningful public participation that shifts power to communities of color and other marginalized communities. It also means agencies must deliver equitable outcomes that secure material benefits and rights protections for all.

- When agencies make decisions, they need to engage the public in ways that lift up the voices of marginalized communities and limit the influence of overrepresented stakeholders, specifically corporate interests. Agencies must show how community engagement has shaped their decisions, and decisions must reflect what agencies have heard and learned.
- We must embed the principle of racial and other equity in administrative operations and procedures. That is how we change agencies' institutional interests, which traditionally privilege efficiency, and refocus decision-making on substantive democratic goals, such as eliminating disparities and addressing the needs of those pushed to the economic margins.

### **Progress: A Shift towards Community Engagement and Equity**

**Tools:** [Executive Order 13985](#) (*Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*), [EO 14091](#) (*Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*), [EO 14094](#) (*Modernizing Regulatory Review*)

The Biden-Harris administration has instructed agencies to expand public participation and community engagement and to proactively advance racial and other equity in their work. We will discuss in the sections below what it takes to implement these directives and, ultimately, to turn them into results for our communities.

### **Opportunities to Protect and Push:**

- Help change the narrative about government: talk about how public administration's job is to deliver for all people, and how we can push agencies to become drivers for racial and other equity.
- Engage directly in administrative advocacy; don't cede the terrain to far right and corporate forces.

*“The administrative branch can drive equitable results and make our government work for all people. Agencies enforce our civil rights laws, fund underserved communities, issue rules that can protect the environment and check corporate power, and advance a fair balance between labor and management. That's why Project 2025 wants to hijack the administrative state.”*

**CHIRAAG BAINS**

former Deputy Director and Deputy Assistant to the President, Domestic Policy Council, The White House

## Imagine: Federal Agencies Have the Capacity to Meet All People's Needs

**Pathway:** *Shift agency capacity from policing and controlling to providing and protecting*

Government must have the capacity to deliver on everyone's needs, close racial and other equity gaps, protect us from systemic harm, and respond to urgent challenges like the climate crisis. Meeting these responsibilities, and thereby gaining public trust, requires resources and staff. In recent decades, those parts of government that provide public services and protections, including civil rights protections, have suffered from disinvestment, while the parts operating in the domain of violence, such as defense, immigration control, federal policing and prisons, have attracted greater resources. This imbalance has severely burdened people of color, who are subjected to control and repression while deprived of much needed services.

- We must shift the debate from the size of government to the quality of government. Administrative functions that advance democratic goals need more resources, and those that cause harm deserve less.
- For example, to ensure that the Internal Revenue Service audits Black and non-Black taxpayers at the same rate, we need a capable IRS that prioritizes equity, not merely efficiency. Evidence shows that when audit selection is driven by incentives to cut costs, [Black taxpayers](#) get audited at a higher rate, and audit rates for millionaires [decline](#). A short-staffed IRS will cut corners. With the same number of staff in 2021 as in 1970, the IRS has one person for every [16,000](#) calls it gets. Project 2025 seeks to repeal additional IRS funding and keep the IRS budget flat.

## Progress: Implementing Whole-of-Government Initiatives to Unlock Capacities

**Tools:** *EO 13985 and EO 14091 (Racial Equity), [EO 14036](#) (Promoting Competition in the American Economy), EO 14094 (Modernizing Regulatory Review), [EO 14025](#) (Worker Organizing and Empowerment)*

The Biden-Harris administration introduced a whole-of-government approach to coordinate agency actions and unlock new ways of deploying capacities toward shared goals (see an [analysis](#) by K. Sabeel Rahman). The whole-of-government mandates for advancing racial and other equity, tackling corporate consolidation and market concentration, and strengthening worker power instruct agencies to learn together and from each other, supported by equity teams and an interagency working group that centralizes equity data collection. The Office of Information and Regulatory Affairs (OIRA) has been repositioned as a partner in rulemaking, not an adversary, assisting agencies in using new rulemaking tools and adopting proactive public engagement strategies.

- The Consumer Financial Protection Bureau's creation in 2010 is an example of strengthening government's protective capacity and orienting it toward a clear purpose: consumer protection. Since then, CFPB has addressed 5.6 million consumer complaints. Project 2025 would abolish the CFPB.

## Opportunities to Protect and Push:

- Push for budget increases for those agencies and offices that can deliver for your communities.
- Push for additional capacity for offices and teams focused on racial and other equity.

## Imagine: Federal Agencies Proactively Advance Equitable Outcomes

**Pathway:** Institutionalize an affirmative duty to advance equity, including a clear commitment to racial equity

When agencies make rules, deliver services, distribute funding, or take enforcement action, they transfer power and resources. How can we ensure such transfers are equitable? Unless racial and other equity is prioritized as a core principle, administrative processes risk perpetuating systemic bias. And unless equity becomes an affirmative or proactive duty, agencies can narrowly focus on preventing discrimination. An equity framework for public administration would include:

- an affirmative mandate to pursue equitable outcomes by closing racial and other equity gaps, while improving services and protections for all,
- a commitment to agency-wide change efforts to normalize, organize, and operationalize the work of equity,
- the resources, staffing, and training to implement an equity mandate and improve the quality of governance, while minimizing transition costs, and
- defensible methodologies and tools to plan, analyze, and measure how agency actions impact different population groups, how benefits can be better targeted, and who has voice and power in the process.

## Progress: An Affirmative Mandate for Equity across Government Agencies

**Tools:** EO 13985 and EO 14091 (Racial Equity), [EO 14096](#) (Revitalizing Our Nation’s Commitment to Environmental Justice for All), EO 14094 (Modernizing Regulatory Review), Revised [Circular A-4](#) “Regulatory Analysis”, [Justice40 Initiative](#), agency equity assessments and [equity action plans](#)

The Biden-Harris administration put in place an affirmative equity mandate for all agencies. Agencies assessed how their programs perpetuate systemic barriers for people of color and other underserved groups, developed equity action plans, and reported on [progress](#). This equity agenda has informed policymaking and is changing how agencies approach and carry out their work.

- Equity-driven policies and investments: The Justice40 Initiative, which requires that 40% of investment benefits flow to disadvantaged communities, has shifted how agencies view their responsibilities toward those communities. For example, the Department of Transportation developed a multi-billion dollar [initiative](#) to physically reconnect the mostly Black and Latino/a neighborhoods cut off by highway projects in the 1960s.
- Equity tools that enable staff to bring equity considerations into their workstreams: OIRA, the office tasked with reviewing proposed rules, revised the cost-benefit analysis method that determines the fate of regulatory proposals. Benefit-cost analysis now considers the [distributional effects](#) of a rule, using disaggregated data to break down benefits and burdens along demographic lines. It also places greater weight on long-term environmental and health effects, including impacts that are hard to monetize or quantify. This revised method enables agencies to make more informed policy choices, prevent or mitigate unintended consequences, and optimize for racial and other equity. The Department of Labor used the distributional analysis to better target its new [overtime rule](#) on workers of color and women: the rule will extend overtime protections to nearly 1 out of every 5 Black, Latino/a, and women workers.

*“Changing administrative systems and structures is even more important than specific individual policy wins, because changes to systems and structures have a much higher likelihood of durable, meaningful impact over time to advance the cause of equity and justice.”*

**MATTHEW TEJADA**

former Deputy Assistant Administrator for Environmental Justice, Office for Environmental Justice and External Civil Rights, EPA

## Opportunities to Protect and Push:

- Review the [equity action plan](#) of an agency relevant to your work and hold them accountable for meeting their goals.
- If a proposed rule risks burdening your communities, ask whether rule makers have considered the impact on specific communities of color. If there is no distributional analysis using disaggregated data, ask for one and, if needed, call them out on it.
- Hold your local jurisdiction accountable for allocating federal funding equitably. Push for timely spending, because Project 2025 threatens to claw back funding, especially climate-related dollars.

### **Imagine: Our Government, Not Corporations, Provides Public Goods and Services**

#### **Pathway:** *Stop harmful privatization and outsourcing*

Public administration is responsible for providing public goods, services, and infrastructure. Since the 1980s, however, government has increasingly divested of the ownership of public things, privatized public services, and outsourced the administration of public benefits, thus funneling public money towards private profits.

- To increase public accountability, we must take back control from large private contractors who operate far away from public scrutiny and due process constraints.
- To increase racial and other equity in access to public services and programs, we must remove the private middlemen, such as for-profit administrators of the Temporary Assistance for Needy Families (TANF) program, who have financial incentives to limit access and impose burden on beneficiaries.
- To improve employment opportunities for Black and women workers, we must limit outsourcing, which [suppresses wages](#).

### **Progress: Accountability Requirements for Private Contractors**

**Tools:** [EO 1463](#) (*Use of Project Labor Agreements for Federal Construction Projects*), *community benefits plan requirements for Department of Energy applicants*

New requirements for private contractors may increase accountability.

- All agencies must require large construction contractors to use project labor agreements, which provide some protections for workers and local communities.
- The Department of Energy requires contractors who receive funding from the Infrastructure Investment and Jobs Act and the Inflation Reduction Act to develop [community benefits plans](#) that advance equity.

### **Opportunities to Protect and Push:**

- Steer communities toward public services and away from harmful private options that sustain or increase racial and other equity gaps ([school vouchers](#), [Medicare Advantage](#) plans, [private equity owned hospitals](#), etc.).
- Speak out against Project 2025's plans to further privatize schools, Medicare, and other public goods.

## Imagine: People Have Equitable and Easy Access to Public Programs and Benefits

**Pathway:** Remove administrative burdens in access to government programs

People should have no difficulties exercising their basic rights and meeting their basic needs, including accessing income support, health care, unemployment benefits, food assistance, and voting. Yet many people's encounter with public services is filtered through administrative burdens, such as eligibility criteria, enrollment procedures, wait times, and form-filling. They experience government as controlling, degrading, or excluding. Administrative burdens are racialized and serve as a key source of inequity. They are designed to make it harder for people living in poverty or on low income, especially people of color, women, and immigrants, to access the services and benefits they are entitled to. Wealthier, white people tend to receive their public subsidies automatically, such as the tax exclusion for employer-sponsored health insurance.

- Make more public programs universal, rather than means-tested, like free school meals.
- Deliver more public assistance through cash grants instead of complex programs with application hurdles.

## Progress: Initiatives to Minimize Administrative Burden

**Tools:** [EO 14058](#) (*Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government*), Office of Management and Budget (OMB) Memo on [Improving Access](#) to Public Benefits Programs; OMB [Guidance](#) for Federal Financial Assistance; *partnerships with community groups*

OIRA's [Burden Reduction Initiative](#) has asked agencies to deliver services more equitably and effectively and to minimize administrative burdens in ways that reduce the time, effort, money, and stress people experience when trying to access government services. Several agencies [reported](#) streamlining their eligibility and enrollment procedures. A pilot [framework](#) seeks to align government services with people's needs, instead of requiring people to adjust their needs to whatever programs they can find. Other strategies include:

- Affirmative outreach to beneficiaries and partnering with community groups: To increase uptake of the expanded 2021 child tax credit, which was fully refundable, the IRS partnered with community groups to assist poor families in claiming this credit. The credit temporarily [reduced](#) Black and Latino/a child poverty, which is three times higher than the poverty rate of white children, by more than half.
- Easier access to federal funding: To build the capacity of underserved communities to access and manage federal grants, the [Interagency Thriving Communities Network](#) provides place-based technical assistance to hundreds of disadvantaged communities across the country.

## Opportunities to Protect and Push:

- Collect people's experiences of administrative burdens and report them to the responsible agency, the White House, or your member of Congress. Respond when an agency asks for [comments](#) on a new [form](#).
- Raise awareness of Project 2025's plans to increase administrative burdens, such as greater barriers to accessing food assistance (*Project 2025*, p.300) and work requirements for Medicaid (*Project 2025*, p.468).
- Contact program staff in the office related to your work and ask them for assistance with finding [grants](#) for your community.

### Congressional bills introduced to protect administrative democracy:

- The Stop Corporate Capture Act ([H.R. 1507](#), Rep. Jayapal) establishes an Office of the Public Advocate and limits the power of judges to interfere with agencies' regulatory policy.
- The Saving the Civil Service Act ([H.R. 1002 /S. 399](#)) ensures the civil service system cannot be politically manipulated.
- The [No Kings Act](#) (S. 4973, *Senators Schumer, Reed, Whitehouse*) reaffirms that presidents do not have immunity for criminal acts.

### Imagine: Government Keeps Markets and Industry in Check

**Pathway:** *Ensure that agency rules protect public interests against private-sector interests*

The purpose of the regulatory system is to protect people's rights and the common good, including the environment, from extractive and exploitative markets and corporations. When industry evades regulation, government appears inept or irrelevant to those harmed by deeply inequitable practices, say, price gauging by grocery chains. But organized business interests, marshalling legal and technical expertise, have outsize influence on the rulemaking process. We need regulatory reforms that fend off corporate capture, or, in the words of the [Government Accountability Office](#), that prevent "a regulator acting in the interest of the regulated industry rather than in the public interest." This requires rebalancing political power by making it easier for public and community interests to become a countervailing force against corporate actors.

### Progress: Revised Procedures and Principles for Rulemaking

**Tools:** *EO 14094 (Modernizing Regulatory Review), [OIRA Guidance](#) on 12866 Meetings, EO 14096 (Environmental Justice)*

- OIRA has an open-door policy to meet with anyone who requests it about a rule under review. But meeting data showed a pattern of industry visits outnumbering public interest visits by a ratio of almost [four to one](#). OIRA's revised guidance aims to avoid repeat meetings with the same well-connected interest groups. Instead of meeting separately with various representatives of, for example, the Chamber of Commerce, such meetings will now be grouped into one.
- Several recent EPA rules center on protecting disadvantaged communities from harmful industry operations, thereby advancing environmental justice (e.g., regulations of forever chemicals, air toxics, and lead in drinking water).

### Opportunities to Protect and Push:

- Engage in the rulemaking process: join townhalls or [listening sessions](#), attend a training call (email [publicparticipation@omb.eop.gov](mailto:publicparticipation@omb.eop.gov)), submit a [public comment](#), [find](#) regulations under review by OIRA and [schedule](#) a virtual 12866 meeting.
- Report an unfair consumer or labor practice, or a civil rights violation, through agencies' formal complaint procedures. Some agencies investigate individual complaints or charges, while others develop investigative priorities that advocates can influence by supplying facts and requesting an investigation.



## Imagine: Federal Agencies Center Workers' Rights

**Pathway:** Mandate inter-agency coordination to implement a pro-worker agenda

Most administrative actions affect workers, whether directly or indirectly. Agencies should assess those impacts and embed a pro-worker approach in everything they do. Such an agenda would also advance [racial equity](#); for example, forming a union has been shown to [reduce racial disparities](#) in pay and wealth. Workers' rights and worker power should be lifted up in all functional and policy areas, especially in antitrust policy, monetary policy, tax policy and social insurance design.

- Establish an inter-agency mechanism to create and coordinate plans for advancing workers' rights and power.
- Develop workers' rights indicators to track pro-worker goals, opportunities, and actions across agencies.

## Progress: A Whole-of-Government Approach to Advancing Workers' Rights

**Tools:** White House Task Force on Worker Organizing and Empowerment ([EO 14025](#))

- In 2022, an inter-agency task force submitted over 70 [recommendations](#) to advance worker power, worker organizing, and collective bargaining, and reported initial [progress](#) in 2023.
- Recent pro-worker rules include expanding [overtime](#) eligibility, [farmworker protections](#), [retirement security](#), preventing [misclassifications](#) of employees as contractors, and banning many [non-compete clauses](#).
- Agencies have attached labor standards to federal grant funding available through the American Rescue Plan, the Infrastructure Investment and Jobs Act, the CHIPS Act, and the Inflation Reduction Act, coordinated by the [Good Jobs Initiative](#). Most infrastructure projects will have to implement project labor agreements, local hiring policies, apprenticeship programs, outreach programs to underserved communities, and prevailing wage requirements.

## Opportunities to Protect and Push:

- Coordinate with unions and workers' centers to protect and enforce labor standards in federal contracting. Project 2025 seeks to reverse labor standards and other pro-worker rules.

### **Imagine: Administrative Governance Includes Communities of Color and Other Marginalized Communities**

**Pathway:** *Institutionalize participation of marginalized communities in administrative decision-making*

The administrative branch is legally required to seek public input, with the notable exception of decisions on public benefits. Most opportunities for participation, including the notice and comment period during rulemaking, are dominated by well-resourced corporate interests. To rebalance power and advance equitable policies, agencies must adopt an affirmative stance toward reaching and engaging communities of color and other marginalized communities in all matters that impact their lives.

*“Agencies need to be in conversation with movements, learn what people are organizing around, what makes a difference to people’s lives. Agency agendas and rules should be built with input from impacted communities. That means people need a seat at the table.”*

**RAJESH NAYAK**

former Assistant Secretary for Policy, Department of Labor

- Establish an independent office with a mandate to advocate on behalf of communities of color, other marginalized communities, and workers.
- Build a mechanism for interagency coordination of community engagement on issues that involve more than one agency.
- Design community participation to maximize direct influence on administrative decision-making. Agencies must be able to show how community engagement has shaped their final decisions.
- Ensure that agencies and OIRA provide technical assistance and training to communities most affected by particular rules or other agency actions. Communities must be informed about the underlying statutes, rulemaking process, and how to have their voices heard most effectively to influence decisions.
- Work with community organizations to engage public benefits recipients in co-designing benefits programs.

## Progress: Expansion of Community Engagement

**Tools:** EO 14094 (*Modernizing Regulatory Review*), EO 14091 (*Further Advancing Racial Equity*), OMB Memo on [Broadening Public Participation and Community Engagement](#)

- OIRA has asked agencies to build trust-based, long-term, and two-way relationships with underserved communities that have been historically left out of government decision-making. Agencies should publish a regulatory engagement plan that specifies how they will identify and reach impacted communities. They should start engagement early and seek public input when developing their semi-annual [agenda](#) of regulatory priorities. This could include asking communities about problems the agency can help solve, and about projects the agency should take on.
- Agencies [reported](#) using proactive outreach strategies, including collaborating with community organizations to host virtual or in-person townhalls, and visits to impacted communities. The Department of Labor hosts regular calls with various stakeholders, including workers' groups, which provide a forum for receiving direct input on policy priorities.
- The Executive Order on Further Advancing Equity requires proactive engagement with underserved communities, including in agency planning, budgeting, rulemaking, and grantmaking, and asks agencies to increase their coordination with community-based organizations and civil rights organizations.

## Opportunities to Protect and Push:

- Use administrative advocacy to mobilize communities and raise expectations of government.
- Contact an agency or office relevant to your work and ask them about participation opportunities. Request that the agency develop or share a regulatory engagement plan. You can also find announcements of listening sessions in the [Federal Register](#) and notices for public comments on [www.regulations.gov](http://www.regulations.gov).
- Urge an agency or office to develop more accessible and user-centered ways to engage than formal public notices.
- Partner with unions, think tanks, or racial justice advocacy organizations to include your communities' experiences in petitions, comments, complaints, or policy letters. Coordinated campaigns, such as a [joint](#) effort to [submit](#) public comments, can make it easier for community members to get their voices heard.

## Imagine: Agencies Create Organizing Levers for Workers and Communities

**Pathway:** *Design regulatory policies that build power*

Policies have political consequences, and regulations are no different. While addressing a specific economic or social problem, they can also make people's views of government more favorable, empower certain interest groups and weaken others, or set the stage for further reforms. To make policies more robust and resilient, especially against right-wing backlash, agencies should design regulations in ways that help shift the balance of power between workers and employers, burdened communities and corporate polluters, landlords and renters, among many others. Agencies should be cognizant of racial and other equity gaps as they rebalance power.

- Add hooks and levers into regulations that workers, communities or civil rights groups can use to organize, mobilize, and build power.
- Include an assessment of “policy feedback” in regulatory analysis: What political dynamics will a rule produce? Who will it empower? Does it foster the political inclusion of people of color? Will it make democratic values more durable? Will it bolster support so the policy can endure and expand?

## Progress: Some Worker Protection Rules Include Organizing Levers

**Tools:** *EO 14025 (Worker Organizing and Empowerment)*

Several recent worker protection rules increased not only workers' substantive rights and but also included rights to organize around a new policy or process.

- When OSHA required employers to develop a plan to protect workers from COVID-19, it also required them to engage with workers and their representatives in the plan development. Workers could decide themselves whether such representatives would be unions, workers' centers, community organizations, or even a union that had not yet been recognized.
- The Centers for Medicare and Medicaid Services' recent rule on minimum staffing standards for long-term care facilities also required employer engagement with direct care workers and their representatives in a facility assessment.

By providing organizing levers for workers, these rules also strengthened the support for the policy measures they contained.

## Opportunities to Protect and Push:

- Engage in administrative advocacy to insert organizing levers into draft rules.
- Take advantage of organizing levers in rules that are relevant to your area of work.

*“The stakes today are different because for the first time in our history we have actual policy progress that centers the protection and advancement of communities affected by inequities and injustices.”*

**MATTHEW TEJADA**

former Deputy Assistant Administrator for Environmental Justice, Office for Environmental Justice and External Civil Rights, EPA

## Imagine: Administrative Institutions Disperse Their Power

**Pathway:** *Design systems and processes that share power*

Administrative institutions can empower a range of public bodies, along with people themselves, instead of centralizing power in the White House. This can begin by expanding sites and arenas of participation and include both collaborative and adversarial modes of engagement. By building dispersed, countervailing power, it will make it harder for potential authoritarians to act unilaterally.

- Enable race conscious community-led monitoring and enforcement of administrative policies, for example through resident audits.
- Engage community groups representing impacted communities in collaborative governance, co-governance and co-design of public programs and projects.

## Progress: Greater Deference to Tribal Sovereignty

**Tools:** [EO 14112](#) (*Reforming Federal Funding and Support for Tribal Nations To Better Embrace Our Trust Responsibilities and Promote the Next Era of Tribal Self-Determination*); *Presidential Memoranda on [Tribal Consultation](#) and [Strengthening Nation-to-Nation Relationships](#) and on [Uniform Standards for Tribal Consultation](#)*

To increase respect and support for tribal sovereignty, agencies have been asked to improve and standardize their government-to-government consultations with Tribal Nations. Enhanced consultation affords a greater political voice to Tribes, which has led to more equitable policymaking.

- In government-to-government consultations, tribal leaders emphasized the need for predictable, recurring, and full funding for the Indian Health Service (IHS). The president's budget honored this tribal priority, and, as a result, the IHS received an advance appropriation in 2024, a historic first. The president's FY26 budget proposes full mandatory funding for the IHS.

## Opportunities to Protect and Push:

- Support [tribal leadership](#) in asserting their rights as sovereign nations. Project 2025 plans to privatize health and education for Native Americans and open up tribal lands for drilling and mining.

## WHAT'S NEXT: PROTECT AND PUSH

When we reimagine public administration, we can reclaim and defend it. Together we have laid the groundwork for turning public administration into a force for equity and justice. Much remains to be done, given urgent community needs and deeply entrenched racial and other injustices. To protect what we have achieved and to push for more, we must exercise our collective power, including in administrative spaces. We must have the backs of federal workers who are trying to make reforms stick and turn them into realities on the ground. Once people experience positive outcomes, authoritarian threats will ring hollow.

# CALL TO ACTION FOR THE NEXT ADMINISTRATION: WHAT THE PRESIDENT CAN DO ON DAY 1 TO DEEPEN ADMINISTRATIVE DEMOCRACY

## 1 Institutionalize an affirmative administrative duty to advance equity, including a clear commitment to racial equity.

- Require all administrative actions, including those that involve force, to comply with an equity duty.
- Require each agency to have a fully staffed and resourced office dedicated to advancing equity and authorized to act across the institution.
- Require all administrative units to have both equity teams and community engagement teams.
- Mandate public accountability measures for all agencies, including periodic progress reports on equity action plans and environmental justice plans, incorporation of plans into each agency's strategic plan, and a biennial state of equity report for the whole-of-government. All plans and reports must show evidence of meaningful public participation and community engagement and transparently account for how they respond to what was learned through engagement.

### What would happen under a Project 2025 regime?

- All equity offices and teams would be dismantled, and equity plans and tools prohibited. Civil servants that have participated in equity work would be at risk of termination.

## 2 Create an equity scoring system, including for budget development.

- Introduce a uniform equity scoring system and tools to support and measure agency performance.
- Develop a budget equity scoring tool and score all proposed and final budgets for equity.
- Report equity scores publicly, quantifying the resources that flow to communities of color and other marginalized communities.

### What would happen under a Project 2025 regime?

- The use of equity tools would be prohibited, as would the collection of equity and civil rights data.

## 3 Support community-led design and monitoring initiatives.

- Incorporate and fund community-led monitoring of public programs and protections, using equity guidance, to improve government responsiveness and accountability.
- Incorporate and fund community-led design approaches for public services and investments.

### What would happen under a Project 2025 regime?

- Administrative accountability would be one-way only: upwards, to the president.

# 4

## **Expedite and expand initiatives to reduce administrative burden.**

- Engage and fund community-based groups in monitoring and reporting the administrative burdens experienced by people trying to access public programs and services; develop a plan to act on community reports.
- Develop and implement beneficiary-led co-design approaches for public benefits programs.

### **What would happen under a Project 2025 regime?**

- Public services and benefits would be further cut and privatized, and burdens would be expanded to restrict access and deter applicants.

# 5

## **Establish an Office of Community and Worker Advocacy.**

- Establish and resource, with congressional support, an independent office mandated to advocate for and with communities of color, other marginalized communities, and workers in rulemaking and other administrative processes.
- Require each agency, ahead of congressional action, to designate a “regulatory public advocate” to advocate for and with communities of color, other marginalized communities, and workers in rulemaking and other processes.

### **What would happen under a Project 2025 regime?**

- Public participation would be limited to legal requirements and privilege a narrow slice of stakeholders.

# CALL TO ACTION FOR MOVEMENT GROUPS: WHAT MOVEMENT GROUPS CAN DO TO RECLAIM PUBLIC ADMINISTRATION AND RESIST AN AUTHORITARIAN TAKEOVER

## Reclaim and Build:

- 1 Take advantage of new levers for influencing administrative policy.**
  - Use them or lose them: Take up new community engagement opportunities and help turn them into standard operating procedures. Once a process is embedded in agency work, it will be harder to undo.
  - Exercise and grow your governing power: Use administrative processes as a site of building power; don't cede the terrain to far right or corporate forces.
  - Make communities more visible: Provide agencies with community facts for their new regulatory analysis tool, which assesses burden and benefits for different demographic groups.
- 2 Build strategic collaborations to amplify your voice in administrative spaces.**
  - Join forces with unions, think tanks, or national racial justice networks to navigate administrative advocacy spaces, such as rulemaking, enforcement, grantmaking, executive orders, or budget development.
  - Collaborators can help craft an effective intervention and showcase people's stories.
- 3 Influence an agency's multiyear strategic plan and annual rulemaking agenda.**
  - Comment on an agency's multi-year strategic plan (drafts are [published](#) like other regulatory actions). Ask the agency to include measurable goals, actions, and outcomes on racial and other equity. Strategic plans inform annual budgetary requests, work prioritization, and performance reviews of leadership and staff.
  - Let an agency know what urgent problems their rulemaking should address to benefit your communities. Agencies are now required to consult with impacted communities in setting their regulatory priorities. You can ask or petition an agency to issue a rule.
- 4 Support federal legislation that seeks to deepen administrative democracy.**
  - Ask your member of Congress to cosponsor bills that protect and expand administrative democracy and codify progress made to date.
  - Ask your member of Congress to advocate for a federal budget that adds staff positions on community engagement and equity across agencies.



# 5

## **Change the narrative about government and the administrative state.**

- Take on far right conspiracies and make the case for an equitable government that works for all of us.
- Help increase the visibility of federal actions that benefit communities, for example by talking about recent consumer and worker protections that rein in corporate greed.

# 6

## **Recruit equity and justice champions into the federal workforce.**

- Help build a pipeline of future career [civil servants](#) who are rooted in communities of color and other marginalized communities and ready to operationalize equity in government.

## **Resist and Block:**

# 1

### **Push out a counter-narrative about government.**

- Develop a communications strategy to undermine authoritarians' claim to public support.
- Push out a narrative that imagines an equitable government that works for everyone.
- Be prepared to counter harmful rhetoric that idolizes strongmen and divides people.

# 2

### **Begin coordinating an inside-outside strategy now.**

- Build alliances with DC-based groups, unions, and legal advocates to coordinate actions.
  - › Example: When the Trump administration drafted a rule that allowed employers to pocket workers' tips, movement groups, advocates, journalists, and lawyers came together in an inside-outside effort to oppose that rule. Journalists uncovered a technical analysis hidden by the administration, movement groups staged protests, lawyers pursued a legal challenge, and advocates demanded a legislative fix. The all-out effort forced the administration to abandon the rule.

# 3

### **Use the legally required public notice and comment process to object to a rule.**

- Submit a public comment on a harmful draft rule, using stories and facts about who would get harmed. Publicly submitted evidence can be used to challenge a rule in court.

# 4

### **Stand in solidarity with unions that represent federal workers.**

- Connect with federal worker unions ([AFGE](#), [NFFE](#), and [NTEU](#)) and support their efforts to protect civil servants at risk of getting fired or demoted and replaced with partisan loyalists. Federal worker unions' powers would be curtailed under a Project 2025 regime (and ultimately outlawed). Nearly one million federal workers are union members; unionization recently jumped by 20%.

# 5

## **Support workers' centers and community groups whose legal status or funding may be at risk.**

- Defend workers' centers, as they would be subjected to investigative and enforcement actions under a Project 2025 regime (*Project 2025*, p.601).
- Support community groups and nonprofits that received grants from the Inflation Reduction Act. Project 2025 intends to revoke grants and possibly claw back funding.

# 6

## **Push governors, state attorneys general, and mayors to take defensive action against federal authoritarianism.**

- Ask friendly state and local politicians to explore their powers to block federal authoritarian measures or restore protections for people at the state level.

*"I encourage organizers and advocates to take up the new engagement opportunities in rulemaking. The more movement groups engage, the more public participation will become part of agencies' standard operating procedures. That's how it gets baked into the work, and that's how we can rebalance power."*

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*The final version of this toolkit is the sole responsibility of the author and Race Forward.*



## **RACE FORWARD AND THE GOVERNMENT ALLIANCE ON RACE AND EQUITY (GARE):**

We need racially equitable governance and public administration from the local to the federal level. The Government Alliance on Race and Equity (GARE) supports jurisdictions at local and state level to develop and strengthen their racial equity work. You can advocate for your local jurisdiction, your town, city or county, to join GARE at [www.racialequityalliance.org](http://www.racialequityalliance.org). By working in coalition with local governments, we can create a whole-of-government approach for advancing racial justice across the entire country.