

## **Trump, Project 2025, and America First Policy Higher Education Memo**

The following memo includes a summary of Project 2025, the America First Policy Agenda, and Trump's campaign priorities and how they would affect civil rights in higher education. Many of the policies listed below have already been put in motion in the last four months. Based on what was published prior to Inauguration Day, it is likely that we will see the second Trump administration focus on:

- Rescinding regulations on gainful employment, loan repayment, closed school discharge, borrower defense, and more.
- Amendments to the Higher Education Act (HEA) to reduce the role of the federal government in forgiving and modifying loan repayment.
- Privatizing all student loans, eliminating federal student loans such as Direct loans, Grad loans, and Parent Plus loans, and making changes to Income Driven Repayment (IDR) plans and Public Service Loan Forgiveness (PSLF) through immediate negotiated rulemaking.
- Attacks on racial equity and diversity in higher education by restricting accreditors and narrowing of funding for Historically Black Colleges and Universities, Tribal Colleges and Universities, and Minority Serving Institutions.
- Accepting new accreditors who would establish standards that would likely focus on American nationalism, "free speech," and support for short-term or accelerated programs.
- Establishing a new "federal student loan authority" that would end the Office of Federal Student Aid's (FSA) management of student financial assistance programs.

## Project 2025

### Federal Government

Reducing or eliminating the role of the federal government (P. 353):	Establishing a new student loan authority (Pp.. 327 & 340):
<p>Project 2025 focuses on states playing a bigger role than the federal government and proposes significant amendments to HEA, which would require congressional action. Proposed amendments include:</p> <ul style="list-style-type: none"> <li>• Reducing the secretary's power to cancel, compromise, discharge, or forgive principal balances of student loans.</li> <li>• Reducing the secretary's power to modify loan repayment amounts.</li> <li>• Removing ED's authority to forgive loans based on borrower defense.</li> <li>• Eliminating requirements of negotiated rulemaking and using public hearings instead.</li> </ul>	<p>Project 2025 proposes the establishment of a new "federal student loan authority" that would eliminate the Office of Federal Student Aid (FSA)'s oversight on student financial assistance. The new "federal student loan authority" would:</p> <ul style="list-style-type: none"> <li>• Manage loan portfolios and borrower relations, administer loan applications and disbursements, monitor institutions and accountability, and issue regulations.</li> <li>• Be governed by an agency head and board of trustees appointed by the president, with advice and consent of the Senate.</li> </ul>

**Redirection of U.S. Department of Education:** Along with a proposed elimination of the U.S. Department of Education, Project 2025 also proposes structural changes within the following offices.

Office of Career, Technical and Adult Education (P. 326)	Office for Postsecondary Education (OPE) (P. 327)	Institute of Education Sciences (IES) (P. 327)
<ul style="list-style-type: none"> <li>• Transfer the Office of Career, Technical, and Adult Education to the Dept. of Labor.</li> <li>• Move Tribally Controlled Postsecondary Career and Technical Education Program to the Bureau of Indian Education.</li> </ul>	<ul style="list-style-type: none"> <li>• Eliminate or move OPE programs to Employment and Training Administration within the Dept. of Labor.</li> </ul>	<ul style="list-style-type: none"> <li>• Move NCES to the Dept. of Commerce's Census Bureau, or move it to the National Science Foundation if Congress believes the federal government plays a valuable role in research.</li> </ul>

## Student Debt Cancellation and Federal Student Loan Programs

Federal Pell Grants (P. 340)	Consolidate All Federal Loans (P. 340)	Eliminate Income Driven Repayment (IDR) (P. 337)
<ul style="list-style-type: none"> <li>Project 2025 suggests that Federal Pell Grants should function as voucher systems.</li> </ul>	<p>Project 2025 proposes to consolidate all federal loans into a new program that would:</p> <ul style="list-style-type: none"> <li>Utilize income-driven repayment.</li> <li>Offer no interest rate forgiveness.</li> <li>Place annual and aggregate limits on borrowing.</li> <li>Require “skin in the game” from colleges to hold them accountable for loan repayment.</li> </ul>	<p>Proposal of new legislation to eliminate IDR loan forgiveness after 25 years. The secretary would also phase out all existing IDR plans and make new IDR loans ineligible. While Project 2025 calls for the elimination of IDR, it also proposes that the implementation of a new IDR plan should include:</p> <ul style="list-style-type: none"> <li>An income exception equal to the poverty line.</li> <li>Required payments of 10 percent of income above the exemption.</li> </ul>
Privatize All Federal Student Loan Programs (P. 340)	Direct Loans (P. 332)	Perkins Loans (P. 332)
<ul style="list-style-type: none"> <li>Project 2025 calls for private lenders to compete in offering student loans, including subsidized and unsubsidized loans.</li> </ul>	<ul style="list-style-type: none"> <li>Eliminate - Listed as a primary regulatory target.</li> <li>Immediately begin negotiated rulemaking to rescind regulations.</li> </ul>	<ul style="list-style-type: none"> <li>Eliminate - Listed as a primary regulatory target.</li> <li>Immediately begin negotiated rulemaking to rescind regulations.</li> </ul>
Public Service Loan Forgiveness (P. 332)	Grad and Parent Plus Loans (P. 353)	Teacher Loan Forgiveness and Teacher Loan Cancellation (P. 340)
<ul style="list-style-type: none"> <li>Eliminate - Immediately begin negotiated rulemaking. However, this would require congressional action as PSLF is in a <a href="#">statute</a>.</li> </ul>	<ul style="list-style-type: none"> <li>Privatize Grad and Parent PLUS loans. If privatizing is not possible, eliminate these loans.</li> </ul>	<ul style="list-style-type: none"> <li>Project 2025 does not explicitly call for an elimination of TLF and TLC; however, an elimination of “time-based and occupation-based student loan forgiveness” is proposed.</li> </ul>
Teacher Loan Forgiveness (TLF) and Teacher Loan Cancellation (TLC) (P. 340)	Saving on a Valuable Education (SAVE) Plan	Borrower Defense (P. 332)
<ul style="list-style-type: none"> <li>Project 2025 does not explicitly call for an elimination of TLF and TLC; however, an elimination of “time-based and</li> </ul>	<ul style="list-style-type: none"> <li>High likelihood of being eliminated.</li> </ul>	<ul style="list-style-type: none"> <li>Eliminate - Immediately begin negotiated rulemaking to rescind regulations.</li> <li>Amend HEA to remove ED’s authority to forgive loans</li> </ul>

occupation-based student loan forgiveness” is proposed.		based on borrower defense. <ul style="list-style-type: none"> <li>• Eliminate closed school discharge.</li> </ul>
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### More Higher Education Issues:

Attacks on DEI (P. 319)	Restricting Accreditors (Pp. 332, 351, and 355)
<ul style="list-style-type: none"> <li>• Eliminate or rescind Title VI guidance (P. 331).</li> <li>• Project 2025 proposes cuts to DEI programs and LGBTQIA+ rights to health care, education, and workplaces.</li> <li>• Project 2025 considers diversity in higher ed to include “faith-based institutions, career schools, military academies, and lifelong learning programs.”</li> </ul>	<ul style="list-style-type: none"> <li>• Project 2025 proposes for accreditors to no longer be recognized by ED or states by amending HEA and shifting to “voluntary quality assurance.”</li> <li>• Both Project 2025 and Trump Agenda 47 call for the startup and application of new accreditors.</li> <li>• Accreditors would also be prohibited from requiring policies outside of their religious beliefs of faith-based institutions.</li> </ul>
“Risk adjustments” in Data Collection (P. 338)	Funding for HBCUs and TCUs
<ul style="list-style-type: none"> <li>• Project 2025 considers that selective institutions pose stronger outcomes than open enrollment institutions because they admit “low-risk and traditional students.”</li> <li>• According to Project 2025, “high risk and non-traditional students” would be those who have lower incomes and/or student parents.</li> <li>• Quote from P. 338 - “Higher education outcomes data should be...“risk adjusted” to more carefully isolate the impact of educational quality versus socioeconomic status and other factors on college outcomes.”</li> </ul>	<ul style="list-style-type: none"> <li>• Project 2025 proposes to block-grant funding for HBCUs and TCUs.</li> <li>• May face restrictions and could be subjected to budget cuts.</li> </ul>
	Gainful Employment (P. 331)
	<ul style="list-style-type: none"> <li>• Eliminate - Review regulatory changes to roll back or eliminate.</li> </ul>
GEAR UP (P. 361)	Athletics (P. 331)
<ul style="list-style-type: none"> <li>• Eliminate and transition responsibilities to state and local levels.</li> </ul>	<ul style="list-style-type: none"> <li>• Review regulatory changes to roll back or eliminate.</li> <li>• Recategorize Office for Civil Rights (OCR) data collection to discriminate against transgender students.</li> </ul>

## Trump Agenda 47

**Federal Pell Grants:** The Trump campaign supported the creation of accelerated degree programs. Federal Pell Grants could see an expansion to cover these short-term or accelerated programs.

**Attacks on DEI:** The Trump campaign supported an executive order prohibiting DEI in federal agencies and contractors.

**Civil Rights:** The Trump campaign proposed to authorize the Department of Justice to pursue federal civil rights cases against institutions engaging in racial discrimination. Institutions found to be continuing these policies would be fined up to the entire amount of their endowment.

**Accreditors:** Project 2025 and the Trump Agenda 47 called for the startup and application of new accreditors. The Trump campaign proposed to issue an executive order [challenging the recognition of accreditors who support DEI policies](#).

**Funding for “[The American Academy](#)”:** The Trump campaign proposed to tax, fine, and sue the endowment of antisemitic private universities. The campaign proposed to utilize these funds to endow an institution called “The American Academy,” which would offer an “online and free education to every American, and provide full and equivalent credentials to bachelor's degrees.” DEI curricula, programs, and policies would not be allowed within “The American Academy.”

## America First Policy Agenda

In addition, [America First Policy](#) proposes that states use funds from the Adult Education and Family Literacy Act and from Title II of the Workforce Innovation and Opportunity Act for the purposes of obtaining skills necessary for successful transition into and completion of postsecondary education, training, or employment.