

A photograph of the White House at night, illuminated with warm yellow lights. The American flag flies on a tall pole in the foreground. The building's facade is lit up, showing the columns and windows. A fountain is visible in the lower foreground.

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40 YEARS

Special Report

# Executive Actions from the Second Trump Administration

January 24, 2025

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# TFG Special Report: Executive Actions from the Second Trump Administration

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# Introduction

## UPDATE – March 27, 2025

TFG published the first edition of the *TFG Special Report: Executive Actions from the Second Trump Administration* on January 24, 2025. Updates on executive actions that have taken place since that date are included below and **marked in red**. TFG will publish updates to the information covered in this report as they develop.

On Monday, January 20, 2025, President Donald Trump was sworn in as the 47<sup>th</sup> President of the United States. This TFG Special Report outlines the President's **executive orders, memoranda, and proclamations** that were issued during his second term in office. An up-to-date tracker of all legal challenges to Trump administration executive actions is available [here](#).

## Definitions

### Executive Order

[Executive orders](#) (EOs) have the force of law, must be constitutional, and must be published in the Federal Register. EOs affect officials and agencies in the federal government. They cannot usurp statutes already enacted by Congress and cannot be overturned by Congress.

The federal courts, including the U.S. Supreme Court, can rule on presidential authority, and Congress can implement technical challenges to an EO through legislation that can, for example, remove the funding needed to carry out the order. Only a sitting president may rescind an EO.

### Presidential Memorandum

Presidential memoranda impact the government's administrative matters. They are more challenging to monitor, as they need not reference legal authority or be published in the Federal Register.

### Presidential Proclamation

Presidential proclamations are more ceremonial. Proclamations are expressed without the force of law and typically commemorate individuals and events.

The actions that have a direct impact on local governments and public agencies are denoted with a star★. We are also summarizing executive actions that are receiving national attention, some of which may have a local impact in the future.

# Executive Action by the Trump Administration

## Energy & Climate

### ★ **Energy & Climate Unleashing American Energy ([Executive Order 14154](#)) - signed on January 20, 2025**

In one of the more sweeping actions taken by President Trump on his first day, this [EO](#) issues many directives to federal agencies pertaining to energy policy and revokes several Biden-era EOs and other presidential actions. This EO aims to fulfill several promises that President Trump made on the campaign trail, including but not limited to: developing energy, mineral, and timber resources on public lands; attempting to lower household energy costs; identifying and removing regulatory and permitting barriers to energy and resource development, and related infrastructure; resuming Liquefied Natural Gas (LNG) export operations; and pausing the disbursement of funds appropriated for various programs under the Inflation Reduction Act (IRA) and the Infrastructure Investment and Jobs Act (IIJA). A [memorandum](#) issued concurrently by the Office of Management and Budget (OMB) clarifies that this pause only applies “to funds supporting programs, projects, or activities that may be implicated by the policy established in Section 2 of the order,” which are, primarily focused on energy and natural resource-related programs. Individual agencies must certify to OMB that funds from the IRA and IIJA being expended do not conflict with Section 2 of the order.

Local governments and other entities will likely see a near-immediate pause in funding disbursements and the execution of other financial agreements for programs under the IRA and IIJA for at least 90 days (per language in the EO instructing federal agency heads to submit a report to OMB and the National Economic Council by April 20, 2025 detailing the findings of their review of IRA and IIJA funds in the context of the EO). By and large, and per the spirit of the order, these will be programs pertaining to electric vehicles (EVs) and other energy infrastructure programs. Some entities who have applied for funds under these programs will still receive funds, though there may be a delay. This pause will give the administration time to ensure that the funds awarded through these programs are consistent with President Trump and his administration’s political and economic goals. We would further expect that many businesses – such as oil and gas, timber, and mining companies – will enjoy greater access to public lands for resource development purposes, potentially leading to increased investment from these organizations in nearby communities.

### **Putting America First in International Environmental Agreements ([Executive Order 14162](#)) - signed on January 20, 2025**

The [EO](#) directs the U.S. Ambassador to the United Nations to submit formal written notification of the United States’ withdrawal from the Paris Agreement under the United Nations Framework Convention on Climate Change. Commonly known as the “Paris Agreement,” this legally binding international treaty covers climate change mitigation, adaptation, and finance. The withdrawal becomes effective one year after the submission of the letter. The EO further requires the U.S. Ambassador to the United Nations, in collaboration with the Secretary of State and Secretary of the Treasury, to immediately revoke any financial commitments made by the U.S. under any provision, sub-agreement, pact, or accord, or any other similar commitment in association with the Paris Agreement. Further, domestic agencies must detail their actions to revoke or rescind policies that were implemented to advance International Climate Finance. This EO aims to promote future

international treaties and policies with international energy organizations, or any treaty entered into by the United States, to primarily consider the values and contributions of the United States in pursuit of economic and environmental objectives and to limit fiscal engagements with any organization or nation that concern energy policy.

The United States will join Iran, Libya, and Yemen as the only four countries not in the Paris Agreement. The United States previously withdrew from the Paris Agreement in 2020 but rejoined in 2021. This signals the Trump administration's determination to advance domestic energy supplies and production and move away from clean-energy technologies like electric vehicles and power-generating wind turbines. While the United States is currently producing more crude oil and natural gas than any other time in history, the Trump administration will further ramp up production and exports to create energy independence in the United States and provide fossil fuel exports for European allies to lessen their dependence on Russian supplied oil.

## ★ **Declaring a National Energy Emergency ([Executive Order 14156](#)) - signed on January 20, 2025**

This [EO](#) declares a national emergency related to the nation's energy and critical mineral infrastructure, including the "identification, leasing, development, production, transportation, refining, and generation capacity of the United States." Specifically, the EO addresses the vulnerabilities posed to the nation by inadequate energy and mineral infrastructure from foreign adversaries, terrorist organizations, and economic interests. It further identifies "intermittent energy supply and an increasingly unreliable grid" as an immediate threat to national security. Consequently, the EO directs several departments and agencies to immediately utilize relevant emergency authorities to assist in the development of energy infrastructure. Among other things, the EO directs the Administrator of the Environment Protection Agency (EPA), in consultation with the Secretary of Energy, to consider a waiver to allow the year-round sale of E-15 ethanol to increase short-term gasoline supply. The EO also orders federal agency heads to consider submitting applications to the president to utilize the Defense Production Act to meet energy infrastructure and supply shortfalls. The EO also directs various agencies to submit separate reports to the White House identifying actions that may require emergency permits or waivers under the Endangered Species Act (ESA) and Clean Water Act (CWA), respectively.

Generally, a declaration of a national emergency allows the federal government to make use of certain resources and circumvent certain procedures that might otherwise be required by statute (such as CWA and ESA processes). Most tangible impacts may be immediately felt in the permitting space where agencies are being directed to expedite the approval process. In the intermediate- to long-term, it is likely that infrastructure requiring federal approvals or across inter-state boundaries, is likely to be expedited and face less review before certain permitting authorities.

## ★ **Putting People Over Fish: Stopping Radical Environmentalism to Provide Water to Southern California ([Presidential Memorandum](#)) - signed on January 20, 2025**

This [memorandum](#), addressed to the Secretaries of Commerce and Interior, directs them and their constituent agencies to reroute water supplies from the Sacramento-San Joaquin River Delta to parts of California that are in dire need of additional water supply. The memorandum specifically references the recent destructive and deadly wildfires in Southern California. It also refers to the outflow of water supply from snowmelt and precipitation to the ocean, thereby losing valuable drinking and agricultural water supplies. This phenomenon

has been the subject of much debate in recent years as California's communities face critical drought conditions.

The immediate effects of this memorandum will be a federal review of the guidance governing operations of the Central Valley Project and the State Water Project, among others, though specific changes that will be made to these are uncertain. The broad scope and language of the memorandum gives the Secretaries of Commerce and Interior significant leeway in proposing and making changes to these operations. The memorandum also signals that the administration will pursue the development of water storage infrastructure. This will be a welcome development to some but may face opposition from those concerned with the environmental and ecological impact of such infrastructure.

## ★ **Temporary Withdrawal and Review of Offshore Wind Leasing (Presidential Memorandum) - signed on January 20, 2025**

This [memorandum](#) immediately withdraws the territory within the Outer Continental Shelf <sup>1</sup> (OCS) from the federal government's system of leasing territory for wind energy development. Though this withdrawal – in effect a pause – on wind leases is temporary, it is effective indefinitely until the memorandum is revoked. The withdrawal applies only to leases for the purpose of wind energy and infrastructure development. It explicitly excludes leasing OCS territory for oil, gas, and mineral development, and for environmental conservation. Existing wind leases are unaffected, except that the Secretary of Interior and Attorney General are directed to conduct a review of existing leases and make recommendations to the President for the amendment or cancellation of such leases based on ecological, economic, and environmental factors. The Secretary of the Interior, Secretary of Energy, and EPA Administrator are also directed to “assess the environmental impact and cost to surrounding communities of defunct and idle windmills” and subsequently to submit a report to the President.

Communities near pending offshore wind leases should expect an immediate cessation of activities surrounding the lease and likely a cancellation or rejection of the lease application. Existing leases will likely not see an immediate impact, though in the intermediate term, the administration's intent is clearly to review and potentially alter or cancel existing leases.

## ★ **1/30/25 UPDATE: Emergency Measures To Provide Water Resources in California and Improve Disaster Response in Certain Areas (Executive Order 14181) - signed on January 24, 2025**

This [EO](#) was issued in response to the severe wildfires in Southern California and the damage caused by Hurricane Helene in North Carolina. It aims to enhance disaster response efforts by ensuring adequate water resources for firefighting in California and providing federal assistance for recovery efforts in both states. The order directs multiple federal agencies to take necessary actions to address water shortages and regulatory challenges that may hinder disaster response capabilities.

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<sup>1</sup> Outer Continental Shelf (OCS) is defined as “(1) all submerged lands lying seaward and outside of the area of lands beneath navigable waters as defined in the Submerged Lands Act, and of which the subsoil and seabed appertain to the United States and are subject to its jurisdiction and control or within the exclusive economic zone of the United States and adjacent to any territory of the United States; and (2) does not include any area conveyed by Congress to a territorial government for administration (43 USC 1331).”

The EO grants federal agencies the authority to intervene in state-level water management policies to prioritize water deliveries for firefighting. Agencies such as the Department of Defense, Department of the Interior, and Department of Agriculture are instructed to ensure water availability in Southern California by expediting regulatory exemptions under the Endangered Species Act and assessing any legal or bureaucratic barriers that delay water supply projects. Additionally, the Office of Management and Budget (OMB) is tasked with reviewing federal programs related to disaster response to ensure compliance with national disaster preparedness principles.

Beyond water resource management, the order includes provisions for disaster relief efforts in both California and North Carolina. The Department of Housing and Urban Development (HUD) and the Federal Emergency Management Agency (FEMA) are directed to provide housing assistance for individuals displaced by wildfires, while FEMA will oversee federal preparedness grants to support fire response in Los Angeles. The order also addresses North Carolina's recovery needs by allocating federal support for road repairs and housing assistance following Hurricane Helene. While the EO underscores the federal government's role in disaster response, it also specifies that all actions will be carried out within existing legal and budgetary constraints.

## ★ **2/6/25 UPDATE: Unleashing Prosperity Through Deregulation (Executive Order 14192) - signed on January 31, 2025**

This [EO](#) directs federal agencies to eliminate ten regulations for every new one introduced, aiming to “alleviate unnecessary regulatory burdens placed on the American people.” The order requires agencies proposing new regulations for public notice and comments to identify at least ten existing regulations for repeal. Additionally, it mandates that the total incremental cost of new and repealed regulations must be significantly less than zero, as determined by the Director of the Office of Management and Budget (OMB), unless otherwise required by law or OMB directives. To ensure cost neutrality, the order stipulates that the costs of new regulations must be offset by savings from eliminating existing ones. Beginning in FY 2025, the OMB Director will set an annual cap on allowable regulatory costs for each agency. Finally, the OMB Director is responsible for implementing the order and issuing updated guidance on the ten-for-one rule.

While this order directly affects federal agencies, the repeal of existing regulations will have significant implications for municipal organizations that rely on federal programs, funding, and oversight. Changes to federal regulations may alter compliance requirements, eligibility criteria, reporting obligations, and the distribution of grant funds that support local infrastructure, public safety, and community development. Additionally, regulatory repeals could impact federal policies governing land use, zoning, permitting, and economic development, as well as municipal responsibilities related to emergency response, disaster preparedness, labor standards, and public service operations. As local governments navigate these shifts, they may face increased uncertainty in funding streams, legal compliance challenges, and potential conflicts with state or local policies.

## ★ **2/20/25 UPDATE: Establishing the National Energy Dominance Council (Executive Order 14213) - signed on February 14, 2025**

This [EO](#) establishes a “National Energy Dominance Council,” to be chaired by the Secretary of Interior and vice-chaired by the Secretary of Energy, in order to, among other things, advise the President on how to utilize executive actions and the executive branch as a whole to leverage American energy and mineral resources. The Council is tasked with advising the President on strategies regarding permitting, transportation (including pipelines), and regulatory reform, among other topics, to facilitate energy dominance. Further, the Council

must provide recommendations to the President on how to better inform the American public about challenges pertaining to energy development and the “urgency of reliable energy ... national security concerns ... jobs ... and regulatory constraints.” Notably, the Council is also directed to advise the President on how to bring Small Modular Nuclear Reactors (SMRs) online. In addition to the Secretaries of Energy and Interior, the Council will be composed of the Secretaries of State, Treasury, Defense, Agriculture, Commerce, Transportation, the Attorney General, the EPA Administrator, and more. The President is given the discretion to designate further members of the Council as he so chooses.

While there is no immediate policy or regulatory shift made by this EO, the Council is directed to provide reports to the President within 100 days “and from time to time thereafter.” It will become more apparent which policies and regulatory changes may result after the first report is released. We expect that local communities, particularly those in States and regions with significant energy and/or mineral industries, may soon see direct outreach from federal partners regarding challenges or lessons those communities face. These stories and data will help inform the Council’s report. Areas of the country named in the EO explicitly – New England, California, and Alaska – will see an uptick in attention to issues surrounding pipeline and energy development and will likely also be targets of the administration’s legal and regulatory efforts in order to advance energy development.

### ★ **3/6/25 UPDATE: Immediate Expansion of American Timber Production (Executive Order 14225) - signed on March 1, 2025**

This [EO](#) directs the Secretaries of Agriculture and the Interior to reverse and simplify regulatory hurdles to increase domestic timber production. To achieve this, the EO outlines a series of actions to enhance timber production and forest management on federal lands. Within 30 days of the EO’s signature, the Director of the Bureau of Land Management (BLM) and the Chief of the U.S. Forest Service (USFS) must issue new or updated guidance on tools to increase timber production, improve forest management, reduce delivery timelines, and decrease supply uncertainty. They must also submit legislative proposals to the Director of the Office of Management and Budget (OMB) to expand authorities supporting these objectives.

Within 60 days, the Director of the U.S. Fish and Wildlife Service (FWS) and the Assistant Administrator for Fisheries must complete a strategy under Section 7 of the Endangered Species Act (ESA) to expedite the approval of USFS and BLM forestry projects. Additionally, the FWS Director must assess existing authorities to delegate ESA consultation responsibilities and propose legislative solutions if needed.

Within 90 days, the Secretaries of Agriculture and the Interior must submit a plan that establishes annual timber sales targets from BLM- and USFS-managed lands for the next four years.

This EO further directs the Secretaries of Agriculture and the Interior to review and adopt new categorical exclusions (CEs) to streamline administrative approvals for timber production, forest management, and wildfire risk reduction. It also calls for establishing a new CE for timber thinning, re-establishing a CE for timber salvage activities, and eliminating permitting processes that create unnecessary burdens or delays for timber production.

This EO will have significant impact on municipal entities with BLM, USFS, USFWS, or other timber producing or wildfire-prone lands within their jurisdictions. By expediting timber sales and streamlining approvals, the EO could support local economic development and create additional opportunities for forest management and wildfire prevention activities, such as tree and brush removal and timber clearing. It may also increase

coordination with municipal governments on forest management efforts, infrastructure use, and resource planning.

## Inflation, Trade & Tax

### ★ Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis ([Presidential Memorandum](#)) - signed on January 20, 2025

President Trump issued a [memorandum](#) directing federal agencies to provide emergency price relief and reduce regulatory burdens, citing the Biden administration's policies as contributors to inflation and rising costs for essential goods and services. The memorandum criticizes previous policies for promoting excessive government spending, imposing restrictive regulations on energy and housing, and mandating a shift toward electric vehicles. Key priorities include lowering housing costs and expanding supply, reducing healthcare expenses, eliminating regulations on home appliances, and reversing climate policies perceived to increase food and fuel prices. No later than February 19, 2025, the Assistant to the President for Economic Policy must report to President Trump on the status of the implementation of this memorandum, and every 30 days thereafter.

State and local communities are likely to experience various effects from these measures. Efforts to lower housing costs may boost local housing availability and increase property tax revenues. Energy policy rollbacks could reduce fuel costs but may challenge state-level renewable energy initiatives. Local governments may need to adapt healthcare and job training programs to align with federal directives aimed at cost reduction and workforce expansion. Additionally, repealing climate-related regulations could conflict with state and local environmental goals, potentially diminishing funding for sustainability efforts. This memorandum marks a significant policy shift toward deregulation and cost reduction, with wide-ranging implications for local governance and planning.

### America First Trade Policy ([Presidential Memorandum](#)) - signed on January 20, 2025

This [memorandum](#) reflects many of President Trump's longstanding trade priorities and directs federal agencies to renew an "America First" approach to the issue. It calls for US trade policy to protect American workers, farmers, and business interests, enhance industrial capabilities, and reduce trade deficits. The memorandum requires numerous reports be given to the President by April 1, 2025, that help achieve the objectives. These will include reviews and recommendations on a wide range of trade issues, including proposals to lower the trade deficit using tariffs; revisions to the US-Mexico-Canada (USMCA) free trade agreement; China's compliance with the US-China trade deal; measures to counter currency manipulation; protecting American intellectual property rights; enhancing export controls; and more.

Since entering politics in 2015, President Trump has made trade a key focus of his platform and used it to further both his domestic and foreign policy goals. During his first administration, the President took action in this area by signing a trade deal with China, renegotiating the free trade agreement with Mexico and Canada, and levying tariffs on steel and aluminum imports. This memorandum represents a continuation of many of these priorities and establishes a framework for addressing trade issues over the next four years. Most notably, the administration is poised to act quickly on implementing new tariffs to help reverse trade deficits,

with President Trump saying that by February 1, he plans to place a 25 percent tariff on all goods coming in from Mexico and Canada, as well as a 10 percent tariff on goods from China. Such a move could have far-reaching impacts on the \$1.5 trillion worth of goods and services these countries send to the US and will likely just be the opening salvo as part of a flurry of trade activity for the new administration. In the months ahead, trade policy will play a key role in many of the administration's broader goals, such as increasing domestic manufacturing and pushing back on China's influence on the global stage.

### **2/13/25 UPDATE: Adjusting Imports of Steel Into the United States (Proclamation 10896) - signed on February 10, 2025**

This proclamation reinstates a full 25 percent tariff on steel imports to the United States from all nations and jurisdictions. The proclamation includes eliminating all alternative agreements, applying strict "melted and poured" standards, expanding tariffs to include key downstream products, terminating all general approved exclusions, and cracking down on tariff misclassification and duty evasion schemes. The countries of Argentina, Australia, Brazil, Canada, Japan, Mexico, South Korea, the European Union, Ukraine, and the United Kingdom had previously received exemptions from this type of tariff. These tariffs are set to take effect beginning on March 12, 2025. The proclamation is authorized under [Section 232](#) of the Trade Expansion Act of 1962, which authorizes the president to adjust imports, including by imposing tariffs, when they are determined to threaten national security.

According to trade experts, while the steel tariffs will likely strengthen the United States' steel industry, the costs of these tariffs are typically passed onto American consumers. This means that some products that rely on steel, such as vehicles and appliances, are likely to become more expensive for consumers and public entities.

### **2/13/25 UPDATE: Adjusting Imports of Aluminum Into the United States (Proclamation 10895) - signed on February 10, 2025**

This proclamation increases tariffs from 10 percent to 25 percent on aluminum imports to the United States from all nations and jurisdictions. The proclamation includes eliminating all alternative agreements, applying strict "melted and poured" standards, expanding tariffs to include key downstream products, terminating all general approved exclusions, and cracking down on tariff misclassification and duty evasion schemes. The countries of Argentina, Australia, Brazil, Canada, Japan, Mexico, South Korea, the European Union, Ukraine, and the United Kingdom had previously received exemptions from this type of tariff. These tariffs are set to take effect beginning on March 12, 2025. The proclamation is authorized under [Section 232](#) of the Trade Expansion Act of 1962, which authorizes the president to adjust imports, including by imposing tariffs, when they are determined to threaten national security.

Like steel tariffs, while the aluminum tariffs will likely strengthen the United States' aluminum industry, the costs of these tariffs are typically passed onto American consumers, according to trade experts. So, some products that rely on aluminum, such as vehicles and appliances, are likely to become more expensive for consumers and public entities.

## ★ Federal Workforce & Processes

President Trump has issued four executive actions impacting the federal workforce, all signed on January 20, 2025. They include an EO to “Reform the Federal Hiring Process and Restore Merit to Government Service” ([EO 14170](#)), an EO on “Restoring Accountability to Policy-Influencing Positions Within the Federal Workforce,” ([EO 14171](#)) and two Presidential Memoranda, one of which issues a [Hiring Freeze](#) and another that orders federal employees to [Return to In-person Work](#). EO 14170 reforms federal hiring. It aims to restructure Federal hiring practices and principles and requires multiple federal department directors to collectively develop a “Federal Hiring Plan” that prioritizes merit over equity. The EO prioritizes recruiting individuals committed “to improving government efficiency, passionate about the ideals of our American republic, and committed to upholding the rule of law and the US Constitution.” It also prevents hiring based on race, sex, and religion and prevents hiring individuals who are unwilling “to defend the constitution or faithfully serve the Executive Branch.” The EO states that the plan should focus on decreasing hiring time, incorporation of evidence-based practices and modernization of technology for hiring, and development of performance metrics to evaluate the success of the reform policy.

EO 14171 revives President Trump’s “Schedule F” executive order, originally signed in October 2020. This EO reclassifies certain federal employees involved in policymaking positions to positions with fewer civil service protections, making it easier to hire and fire individuals in these roles. The move aims to grant the administration greater flexibility in managing personnel but raises significant concerns about potential politicization of the civil service. Between January 20 and February 6, [four separate lawsuits were filed](#) in federal district court against the Trump Administration seeking to block implementation of EO 14171.

The hiring freeze stipulates that no federal civilian positions vacant as of noon on January 20, 2025, may be filled, and no new positions may be created unless explicitly authorized. The freeze does not apply to military personnel or positions related to immigration enforcement, national security, or public safety, and it will not adversely impact Social Security, Medicare, or veterans’ benefits. Hiring freezes are a common occurrence during administration transitions and occurred with both the administrations of Jimmy Carter and Ronald Reagan. Administrations often implement temporary freezes to reassess federal staffing needs, review agency budgets, and align workforce priorities with the new administration’s policy objectives. Lastly, the directive to return to in-person work states that all necessary steps should be taken to terminate remote work arrangements for federal employees and requires them to return to work in-person on a full-time basis. Department and agency heads may make exemptions as deemed necessary.

The executive actions issued could have a ripple effect on local communities and governments, particularly in areas where federal policies and programs influence local operations. Collectively, all three actions may lead to slow response times, staffing turnovers, and staffing shortfalls that could slow interactions with federal programs and services that local governments rely on, such as grants management and advancement of infrastructure projects and community development initiatives. Conversely, it could also improve interaction as new staff are hired or reallocated to new positions.

## Establishing and Implementing the President’s “Department of Government Efficiency” ([Executive Order 14158](#)) - signed on January 20, 2025

This [EO](#) formally establishes the Department of Government Efficiency (DOGE) “to implement the President’s DOGE Agenda by modernizing Federal technology and software to maximize governmental efficiency and productivity.” The EO structures DOGE by renaming the United States Digital Service (which was created by former President Barack Obama in August 2014) as the United States DOGE Service (USDS), establishing it within the Executive Office of the President (EOP). The USDS Administrator will report to the White House Chief of Staff and finalize the work of the department by July 4, 2026 (because it is established as a temporary organization known as “the U.S. DOGE Service Temporary Organization”). There will be a “DOGE Team” in each federal agency comprised of at least four employees (including one DOGE Team Lead, one engineer, one human resources specialist, and one attorney) and those teams must be established no later than February 19, 2025. The USDS Administrator is tasked with “commenc[ing] a Software Modernization Initiative to improve the quality and efficiency of government-wide software, network infrastructure, and information technology (IT) systems [and] work[ing] with Agency Heads to promote inter-operability between agency networks and systems, ensure data integrity, and facilitate responsible data collection and synchronization.”

The creation of DOGE was originally [announced](#) by President Trump on November 12, 2024, when he also named Elon Musk and Vivek Ramaswamy as DOGE co-leads. While the original announcement regarding the creation of DOGE indicated that its primary focus would be to “provide advice and guidance from outside of Government, drive large scale structural reform, and create an entrepreneurial approach to Government never seen before,” the mission of DOGE outlined in the EO indicates a slightly different focus, more weighted on improving the quality, efficiency, and synchronization of federal technology and software systems. Ramaswamy [announced](#) on January 20, 2025, that he would no longer be involved in DOGE moving forward.

## 2/13/25 UPDATE: Implementing the President’s “Department of Government Efficiency” Workforce Optimization Initiative ([Executive Order 14210](#)) - signed on February 11, 2025

This [EO](#) calls for the Office of Management and Budget (OMB) to develop a plan directing federal agencies to “hire no more than one employee for every four employees that depart.” Further, the plan would allow DOGE Team Leads at federal agencies to decide whether a vacancy should or should not be filled, unless determined otherwise by the head of the agency. The order does allow for exceptions to this new hiring practice in the case of jobs related to public safety, immigration enforcement, and law enforcement. Federal agency heads are required, no later than March 13, 2025, to submit to the OMB Director a report that identifies any statutes that establish the agency, or subcomponents of the agency, as statutorily required entities and which discusses whether the agency or any of its subcomponents should be eliminated or consolidated. The Administrator of the U.S. DOGE Service is required, no later than October 9, 2025, to submit a report to the President regarding implementation of the EO, including a recommendation as to whether any of its provisions should be extended, modified, or terminated.

The EO is consistent with the President’s broader effort to shrink the federal workforce, most notably by offering a deferred resignation program that was previously delayed by a federal court. While the deferred resignation option would represent an immediate one-off reduction of federal workers, this EO takes a longer-term reduction approach by choosing to only hire one person for every four departures. As such, the immediate impact would be less noticeable but could represent a significant decrease if implemented over a

four-year period. Excluding active-duty military and the USPS, the federal government has more than 2.3 million full-time employees, and these combined efforts to reduce that number will likely require responsibilities to be reshuffled and affect the ongoing operations of federal agencies.

## ★ **2/27/25 UPDATE: Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative ([Executive Order 14219](#)) - signed on February 19, 2025**

This [EO](#) requires federal agency heads to initiate a process to review all federal regulations subject to their sole or joint jurisdiction for consistency with law and administration policy. No later than April 20, 2025, agency heads are required to identify the following classes of regulations and provide a list of all identified regulations to the Administrator of the Office of Information and Regulatory Affairs (OIRA), who is then required to develop a Unified Regulatory Agenda that seeks to rescind or modify these regulations:

- Unconstitutional regulations and regulations that raise serious constitutional difficulties, such as exceeding the scope of the power vested in the federal government by the Constitution.
- Regulations that are based on unlawful delegations of legislative power.
- Regulations that are based on anything other than the best reading of the underlying statutory authority or prohibition.
- Regulations that implicate matters of social, political, or economic significance that are not authorized by clear statutory authority.
- Regulations that impose significant costs upon private parties that are not outweighed by public benefits.
- Regulations that harm the national interest by significantly and unjustifiably impeding technological innovation, infrastructure development, disaster response, inflation reduction, research and development, economic development, energy production, land use, and foreign policy objectives.
- Regulations that impose undue burdens on small businesses and impede private enterprise and entrepreneurship.

The EO also instructs federal agency heads to “preserve their limited enforcement resources by generally de-prioritizing actions to enforce regulations that are based on anything other than the best reading of a statute and de-prioritizing actions to enforce regulations that go beyond the powers vested in the Federal Government by the Constitution.” They are further instructed to “determine whether ongoing enforcement of any regulations identified in their regulatory review is compliant with law and Administration policy.”

## ★ **2/27/25 UPDATE: Implementing the President’s “Department of Government Efficiency” Cost Efficiency Initiative ([Executive Order 14222](#)) - signed on February 26, 2025**

This [EO](#) “commences a transformation in Federal spending on contracts, grants, and loans to ensure Government spending is transparent and Government employees are accountable to the American public.” This EO requires all federal agency heads to build a centralized technological system within their agency “to seamlessly record every payment issued by the agency pursuant to each of the agency’s covered contracts and grants, along with a brief, written justification for each payment submitted by the agency employee who approved the payment. This system shall include a mechanism for the Agency Head to pause and rapidly review any payment for which the approving employee has not submitted a brief, written justification within the technological system.” Additionally, all federal agency heads are required to “review all existing covered

contracts and grants and, where appropriate and consistent with applicable law, terminate or modify (including through renegotiation) such covered contracts and grants to reduce overall Federal spending or reallocate spending to promote efficiency and advance the policies of [the Trump] Administration. This process shall commence immediately and shall prioritize the review of funds disbursed under covered contracts and grants to educational institutions and foreign entities for waste, fraud, and abuse.” Each Agency Head shall complete this review no later than March 28, 2025. All federal agency heads are also required to conduct a comprehensive review of their agency’s “contracting policies, procedures, and personnel” no later than March 28, 2025, and “shall not issue or approve new contracting officer warrants during the review period, unless the Agency Head determines such approval is necessary.” Following this review, and prior to entering into new contracts, all federal agency heads are required to “issue guidance on signing new contracts or modifying existing contracts to promote Government efficiency and the policies of [the Trump] Administration. The Agency Head may approve new contracts prior to the issuance of such guidance on a case-by-case basis.”

The EO also requires all federal agency heads, no later than March 5, 2025, to confirm to the Administrator of the General Services Administration (GSA) that they have submitted updates to the Federal Real Property Profile Management System to ensure the system reflects a complete and accurate inventory of real property subject to the agency’s administration. No later than March 28, 2025, all federal agency heads are required to “promptly identify all termination rights the Agency Head may have under existing leases of Government-owned real property and, in consultation with agency’s DOGE Team Lead and the Administrator of General Services or his designee, determine whether to exercise such rights.” No later than April 27, 2025, the GSA Administrator is required “to submit a plan to the Director of the Office of Management and Budget (OMB) for the disposition of Government-owned real property which has been deemed by the agency as no longer needed.”

For definitional purposes of this EO, “covered contracts and grants” means discretionary spending through Federal contracts, grants, loans, and related instruments, but excludes direct assistance to individuals; expenditures related to immigration enforcement, law enforcement, the military, public safety, and the intelligence community; and other critical, acute, or emergency spending, as determined by the relevant agency head.

## **2/27/25 UPDATE: Commencing the Reduction of the Federal Bureaucracy ([Executive Order 14217](#)) - signed on February 19, 2025**

This [EO](#) broadly directs several agencies across the federal government to begin procedures to accommodate significant reductions in force, with stated goal to “minimize Government waste and abuse, reduce inflation, and promote American freedom and innovation.” The order directs the following to submit reports to the Office of Management and Budget:

- The Presidio Trust.
- The Inter-American Foundation.
- The United States African Development Foundation.
- The United States Institute of Peace.

The reports submitted by these agencies must confirm compliance with this EO, as well as detail certain minimum, statutorily required functions that these agencies must continue to perform.

The EO also orders the termination of, within 14 days of issuance of the EO, the following Federal Advisory Committees:

- The Advisory Committee on Voluntary Foreign Aid.
- The Academic Research Council of the Consumer Financial Protection Bureau.
- The Credit Union Advisory Council.
- The Community Bank Advisory Council.
- The Secretary’s Advisory Committee on Long COVID within the Department of Health and Human Services.
- The Health Equity Advisory Committee.

Finally, the EO orders that a report be provided to the President within 30 days of issuance of this EO, containing details on “additional unnecessary governmental entities and Federal Advisory Committees that should be terminated on grounds that they are unnecessary.” This last component provides the pretext for the significant reductions in force expected to occur in other federal agencies and departments, particularly those not named explicitly in this EO.

Local governments should expect a near-immediate cessation in activities by entities named in the EO, such as the Committee on Long COVID, the Health Equity Advisory Committee, and more. Further, reductions in force directed in the final part of the EO may result in other agencies, entities, and contacts that local governments utilize being dissolved. This may present a challenge for some local governments. Conversely, this may improve efficiency or mitigate challenges faced by local governments in some instances, by removing bureaucratic or procedural delays.

### ★ **3/20/25 UPDATE: Continuing the Reduction of the Federal Bureaucracy (Executive Order 14238) - signed on March 14, 2025**

This [EO](#) directs that seven federal agencies "shall be eliminated to the maximum extent consistent with applicable law, and such entities shall reduce the performance of their statutory functions and associated personnel to the minimum presence and function required by law" no later than March 21, 2025. That list includes the: (1) Federal Mediation and Conciliation Service, (2) United States Agency for Global Media, (3) Woodrow Wilson International Center for Scholars, (4) Institute of Museum and Library Services (IMLS), (5) United States Interagency Council on Homelessness, (6) Community Development Financial Institutions Fund, and (6) Minority Business Development Agency.

Of interest to many local governments is the potential reduction of services under the IMLS who administers several popular grant programs for public agencies, including Inspire! Grants for Small Museums, Laura Bush 21st Century Library Program, Museum Assessment Program, Museums Empowered: Professional Development Opportunities for Museum Staff, Museums Grants for African American History and Culture, Museums for America, National Leadership Grants: Libraries, and National Leadership Grants: Museums.

Like other recent actions by President Trump aimed at downsizing or eliminating various agencies and departments, this order will likely be challenged in federal court, which means the full impact of it may not be known for a while. However, in the near-term, local governments working with any of these agencies should expect an immediate halt in most activity. Looking ahead, a key factor that will come into play is the reduction of these agencies’ performances to their “statutory function.” Congress often dictates what type of work an office or agency is *supposed* to engage in—sometimes called a “shall” function—while at the same time laying

out work the entity *can* engage in—referred to as a “may” function. Therefore, at the very least, the agencies listed in this order will likely be refocused on whatever “shall” functions Congress has given them, while moving on from programs that classify as a “may” function.

## Immigration & Citizenship

### ★ **2/13/25 UPDATE: Protecting the Meaning and Value of American Citizenship ([Executive Order 14160](#)) - signed on January 20, 2025**

President Trump signed an [EO](#) clarifying his administration’s position on the accepted definition of the Fourteenth Amendment to the United States Constitution. That amendment states, in part:

*“All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside.”*

Under this EO, executive departments of the federal government will interpret the amendment to no longer extend citizenship to persons born in the United States under the following conditions: “(1) when that person’s mother was unlawfully present in the United States, and the father was not a United States citizen or lawful permanent resident at the time of said person’s birth, or (2) when that person’s mother’s presence in the United States at the time of said person’s birth was lawful but temporary (such as, but not limited to, visiting the United States under the auspices of the Visa Waiver Program or visiting on a student, work, or tourist visa) and the father was not a United States citizen or lawful permanent resident at the time of said person’s birth.”

These definitions align with existing exclusions to the Fourteenth Amendment for individuals not “subject to the jurisdiction” of the United States, such as children of foreign diplomats and children of enemy occupying forces.

It is now the policy of the federal government not to issue documents recognizing U.S. citizenship, nor to accept documents issued by state, local, or other authorities recognizing U.S. citizenship to individuals meeting the above criteria. While local governments and other organizations can continue issuing such documents, the federal government will not recognize their legal validity and will not extend federal protections based on them.

This EO applies to persons born in the United States who meet the above criteria and was originally supposed to take effect 30 days from the date of this issuance – on February 19, 2025.

As expected, this EO has faced numerous legal challenges and will likely be reviewed by the United States Supreme Court. Twenty two state attorneys general (AG), the District of Columbia AG, and the city of San Francisco, CA, have [already filed](#) several [lawsuits](#) challenging this executive order, in addition to the [American Civil Liberties Union](#) (ACLU) and [immigrant organizations](#). On January 23, U.S. District Judge John Coughenour (from the U.S. District Court for the Western District of Washington) [issued a Temporary Restraining Order](#) preventing President Trump from carrying out this executive order. Judge Coughenour’s block on President Trump’s EO appears to apply nationwide and will be in effect for 14 days. The issue is expected to wind up at the Supreme Court within days or weeks.

Ahead of the February 6 expiration of the temporary 14-day restraining order blocking this EO, U.S. District Judge Deborah Boardman (from the U.S. District Court for the District of Maryland) prolonged the block with

an [injunction](#) issued on Wednesday, February 5. The injunction creates a long-term hold on the EO unless the merits of the case are resolved, placing the onus on the Trump administration to successfully appeal. Multiple court cases are set for the rest of the week on the EO. On Monday, February 10, a third federal judge, U.S. District Judge Joseph N. Laplante of New Hampshire, issued a preliminary injunction order blocking the EO from the Trump administration signed on January 20.

**3/27/25 UPDATE:** On Thursday, February 13, a fourth federal judge, U.S. District Judge Leo Sorokin of Massachusetts, issued an injunction blocking the EO. The federal court ruling in Massachusetts follows actions taken by three other federal judges in Washington, Maryland, and New Hampshire. On Wednesday, February 19, the San Francisco-based 9<sup>th</sup> U.S. Circuit Court of Appeals [rejected](#) the Trump administration's request for an emergency order putting on hold a nationwide injunction issued by a federal judge in Seattle blocking the EO. Cases are pending before two other appellate courts. On Mar. 13, the Defendants [appealed to the U.S. Supreme Court](#) for a partial stay of the district court's injunction.

## Declaring a National Emergency at the Southern Border of the U.S. ([Proclamation 10886](#)) - signed on January 20, 2025

In this [Presidential Proclamation](#), President Trump stated that the United States is under attack at the southern border. In his proclamation, the President lists cartels, gangs, terrorists, and other foreign entities as responsible parties and deems it necessary for the United States Armed Forces to take all appropriate actions to assist the Department of Homeland Security (DHS) in securing the southern border. His proclamation also declares a national emergency at the southern border and asserts that this emergency requires the assistance of the U.S. Armed Forces. The proclamation prioritizes preventing and deterring unauthorized physical entry at the southern border.

This proclamation and declaration authorize the Secretary of Defense, or secretary of each relevant military department, to order units or members of the Armed Forces to support the Homeland Security Secretary's efforts to gain operational control of the southern border. These orders also include the provision of transportation services, detention space, and logistic services by the Department of Defense (DoD). Additionally, this order allows DoD and DHS to construct additional physical barriers at the southern border and to coordinate with border state governors as necessary.

Furthermore, the declaration recommends that the Secretaries of Commerce and Transportation waive Federal Communications Commission (FCC) and Federal Aviation Administration (FAA) regulations that restrict the use of counter-Unmanned Aerial System (UAS) technology within a five-mile radius of the southern border.

Finally, this proclamation revokes President Biden's [Proclamation 10142](#) of January 20, 2021, titled *Termination of Emergency With Respect to the Southern Border of the United States and Redirection of Funds Diverted to Border Wall Construction*.



## Protecting the American People Against Invasion ([Executive Order 14159](#)) - signed on January 20, 2025

President Trump signed an [EO](#) focused on "executing the immigration laws of the United States." The EO indicates that "it is the policy of the United States to faithfully execute the immigration laws against all inadmissible and removable aliens, particularly those aliens who threaten the safety or security of the American people. Further, it is the policy of the United States to achieve the total and efficient enforcement of

those laws, including through lawful incentives and detention capabilities.” Four immigration-related EOs signed by former President Joe Biden in 2021 are revoked by this order. It outlines civil enforcement priorities and criminal enforcement priorities for the DHS and DOJ.

The EO establishes joint Homeland Security Task Forces (HSTFs) in all states nationwide. The composition of each HSTF “shall be subject to the direction of the Attorney General and the Secretary of Homeland Security but shall include representation from any other Federal agencies with law enforcement officers, or agencies with the ability to provide logistics, intelligence, and operational support to the HSTFs, and shall also include representation from relevant State and local law enforcement agencies.” The objective of each HSTF is “to end the presence of criminal cartels, foreign gangs, and transnational criminal organizations throughout the United States, dismantle cross-border human smuggling and trafficking networks, end the scourge of human smuggling and trafficking, with a particular focus on such offenses involving children, and ensure the use of all available law enforcement tools to faithfully execute the immigration laws of the United States.”

The EO instructs the Secretary of Homeland Security “to authorize State and local law enforcement officials, as the Secretary of Homeland Security determines are qualified and appropriate, to perform the functions of immigration officers in relation to the investigation, apprehension, or detention of aliens in the United States under the direction and the supervision of the Secretary of Homeland Security. Such authorization shall be in addition to, rather than in place of, Federal performance of these duties.”

It instructs the Attorney General and Secretary of Homeland Security to “evaluate and undertake any lawful actions to ensure that so-called ‘sanctuary’ jurisdictions, which seek to interfere with the lawful exercise of Federal law enforcement operations, do not receive access to federal funds. Further, the Attorney General and the Secretary of Homeland Security shall evaluate and undertake any other lawful actions, criminal or civil, that they deem warranted based on any such jurisdiction’s practices that interfere with the enforcement of Federal law.” The EO also instructs the Attorney General and Secretary of Homeland Security to “immediately review and, if appropriate, audit all contracts, grants, or other agreements providing Federal funding to non-governmental organizations supporting or providing services, either directly or indirectly, to removable or illegal aliens” and to “pause distribution of all further funds pursuant to such agreements pending the results of the review” and “terminate all such agreements determined to be in violation of law or to be sources of waste, fraud, or abuse and prohibit any such future agreements.” Lastly, the OMB Director “shall take all appropriate action to ensure that all agencies identify and stop the provision of any public benefits to any illegal alien not authorized to receive them.”

## Securing Our Borders ([Executive Order 14165](#)) - signed on January 20, 2025

President Trump signed an [EO](#) establishing a policy of the United States “to take all appropriate action to secure the borders of our Nation through the following means: Establishing a physical wall and other barriers monitored and supported by adequate personnel and technology; Deterring and preventing the entry of illegal aliens into the United States; Detaining, to the maximum extent authorized by law, aliens apprehended on suspicion of violating Federal or State law, until such time as they are removed from the United States; Removing promptly all aliens who enter or remain in violation of Federal law; Pursuing criminal charges against illegal aliens who violate the immigration laws, and against those who facilitate their unlawful presence in the United States; Cooperating fully with State and local law enforcement officials in enacting Federal-State partnerships to enforce Federal immigration priorities; and Obtaining complete operational control of the borders of the United States.”

This EO instructs the Secretary of Defense and Secretary of Homeland Security to “take all appropriate action to deploy and construct temporary and permanent physical barriers to ensure complete operational control of the southern border of the United States”; “to deploy sufficient personnel along the southern border of the United States to ensure complete operational control”; and “to supplement available personnel to secure the southern border and enforce the immigration laws of the United States through the use of sections 1103(a)(2) and (4)-(6) of the INA (8 U.S.C. 1103(a)(2) and (4)-(6)).” The Secretary of Homeland Security “shall take all appropriate actions to detain, to the fullest extent permitted by law, aliens apprehended for violations of immigration law until their successful removal from the United States.” Lastly, the Attorney General and Secretary of Homeland Security “shall take all appropriate action to prioritize the prosecution of offenses that relate to the borders of the United States, including the investigation and prosecution of offenses that involve human smuggling, human trafficking, child trafficking, and sex trafficking in the United States.”

### **3/27/25 UPDATE: Preserving and Protecting the Integrity of American Elections ([Executive Order 14248](#)) – signed on March 25, 2025**

President Trump signed an [EO](#) making it the policy of his administration to enforce all federal laws to protect the integrity of the American electoral process from interference. This EO specifically cites several federal statutes, including: *2 U.S.C. 7* and *3 U.S.C. 1*, which establish a uniform election day in the United States; *18 U.S.C. 1015* and *611*, which prohibit foreign nationals from registering to vote or voting in federal elections; *National Voter Registration Act* (Public Law 103-31) and the *Help America Vote Act* (Public Law 107-252), which require states to maintain accurate lists of legally registered voters; and *52 U.S.C. 30121*, which prohibits foreign nationals from making contributions or expenditures to electoral campaigns. The EO enforces these laws through the following directives:

- **Enforcing Citizenship Requirements for Federal Elections** by requiring the Election Assistance Commission (EAC) to amend the national voter registration form to mandate documentary proof of U.S. citizenship. State and local officials must record the type of document used, such as a U.S. passport, REAL ID, military ID, or valid federal or state-issued photo ID. The Department of Homeland Security (DHS) and the Secretary of State will provide state and local election officials with free access to federal systems and databases containing citizenship or immigration status information. The DHS, in coordination with the DOGE Administrator, must review voter registration and maintenance lists alongside federal immigration databases and use subpoenas when necessary. The Attorney General will receive information on any foreign nationals who indicated on immigration forms that they registered or voted in an election. Additionally, all federal voter registration agencies must assess citizenship status before providing registration forms to public assistance recipients. The Attorney General will coordinate with state attorneys general to prosecute non-citizens who unlawfully register or vote.
- **Aiding States Verifying Eligibility** by providing States with access to the Social Security Number Verification Service, the Death Master File, and other federal databases to assist with verifying voter eligibility.
- **Improving the Election Assistance Commission** by ceasing to provide federal funding to states that fail to comply with federal election laws, including laws requiring the acceptance and use of the national mail voter registration form or proof of citizenship requirements. The EAC must amend the Voluntary Voting System Guidelines to prohibit voting systems that record votes within barcodes or QR codes. The EAC is also directed to re-certify voting systems based on these standards and report any discrepancies in state certifications to the Department of Justice. Additionally, the EO mandates

that the Secretary of Homeland Security and the FEMA Administrator consider compliance with these guidelines when allocating election-related grant funding to state or local offices.

- **Prosecuting Election Crimes** by directing the Attorney General to enter into information-sharing agreements with chief state election officials to obtain information on suspected violations of state and federal election laws. This includes cases involving ineligible voters, fraudulent registrations or voting, false information on election forms, voter or election official intimidation, or other unlawful conduct. The Attorney General must prioritize enforcement in states that refuse to cooperate and consider withholding law enforcement grants from such jurisdictions.
- **Improving Security of Voting Systems** by enhancing the security of voting equipment and related systems by preventing non-citizens from accessing or managing election infrastructure. It also mandates security assessments of all electronic systems used in voter registration and voting, including any systems connected to or integrated with the internet.
- **Ensuring Compliance with National Election Day Federal Laws** by requiring the Attorney General to enforce laws that prohibit counting absentee or mail-in ballots received after Election Day. The EAC is also required to condition federal funding on a state's adoption of uniform standards for what constitutes a vote and the implementation of a uniform ballot receipt deadline of Election Day for all voting methods.
- **Preventing Foreign Interference and Unlawful Use of Federal Funds** by requiring the Attorney General to enforce laws prohibiting foreign nationals from contributing to U.S. elections and to ensure federal funds are not misused in violation of election-related laws.

This EO may significantly affect how local governments administer federal elections. Non-compliance by a state or locality could result in the withholding of federal funds for election security or operations, as well as law enforcement funding from the Department of Justice. State and local officials will also be required to coordinate with federal law enforcement and oversight entities as they review voter databases for fraud or other irregularities. However, the EO may face legal challenges, as some states do not require documentary proof of citizenship for voter registration and allow timely postmarked ballots received after Election Day to be counted. Such legal challenges may delay, limit, or prevent implementation of certain provisions of the EO.

## Other Actions

### ★ **Regulatory Freeze Pending Review ([Presidential Memorandum](#)) - signed on January 20, 2025**

This [memorandum](#) outlines a regulatory freeze (a temporary halt on implementing or issuing new regulations and rules by government agencies) pending review to all executive departments and agencies. This includes:

- 1) Rule Proposal and Issuance Halt:** No new rules should be proposed or issued until reviewed and approved by a department or agency head appointed by the President after January 20, 2025. This power can be delegated, and exceptions can be made for emergencies by the OMB Director.
- 2) Withdrawal of Unpublished Rules:** Any rules sent to the Office of the Federal Register but not yet published should be withdrawn for review and approval.
- 3) Postponement of Effective Dates:** Agencies should consider delaying the effective date of published rules or those not yet in effect for 60 days to review any factual, legal, or policy questions. During this period, a comment period may be opened for public input, and further delays can be considered if necessary.

**4) Further Action:** After the postponement, no further action is needed for rules without substantial questions. For those with significant issues, agencies should consult with the OMB Director for further steps.

**5) Compliance with Executive Orders:** Agencies must comply with existing EOs on regulatory management. The memorandum applies to all rules, regulatory actions, and guidance documents as defined by relevant U.S. Codes and Executive Orders. The OMB Director oversees its implementation and can review pending information collections under the Paperwork Reduction Act. The President may modify the memorandum if pre-existing actions conflict with its purpose.

A regulatory freeze can impact federal grants and earmarks by delaying funding distribution and disrupting project timelines. During the freeze, agencies may need to pause the implementation of grant programs or the allocation of earmarked funds to ensure they comply with the new administration's review process. This could result in postponed project start dates and additional administrative work as agencies revisit the criteria and procedures for funding. However, exceptions may be made for urgent or emergency needs, such as projects with statutory deadlines or those addressing public health or safety concerns, ensuring critical services are not jeopardized during the review period. It is important to note that when a new president assumes office, it is standard for them to implement a regulatory freeze to review the policies left by their predecessor. This practice dates back to Ronald Reagan in 1981, when his administration released EO 12291, pausing pending regulations to align them with its focus on deregulation and economic recovery. Similar EOs have been released by every incoming administration since, including the Clinton Administration (1993), the Bush Administration (2001), the Obama Administration (2009), the first Trump Administration (2017), and the Biden Administration (2021).



## Ending Radical and Wasteful Government DEI Programs and Preferencing ([Executive Order 14151](#)) - signed on January 20, 2025

This [EO](#) directs the OMB Director to coordinate the termination of all existing “diversity, equity, and inclusion” (DEI) and “diversity, equity, inclusion, and accessibility” (DEIA) mandates, policies, programs, preferences, and activities throughout the federal government “under whatever name they appear,” stemming from executive action taken by former President Joe Biden during his administration. The EO also states that “Federal employment practices, including Federal employee performance reviews, shall reward individual initiative, skills, performance, and hard work and shall not under any circumstances consider DEI or DEIA factors, goals, policies, mandates, or requirements.”

All federal agency and department heads are required, no later than March 21, 2025, to terminate all DEI, DEIA, and “environmental justice” offices and positions; all “equity action plans,” “equity” actions, initiatives, or programs, “equity-related” grants or contracts; and all DEI or DEIA performance requirements for employees, contractors, or grantees. Additionally, all agency and department heads must provide the OMB Director a list of all agency or department DEI, DEIA, or “environmental justice” positions, committees, programs, services, activities, budgets, and expenditures in existence on November 4, 2024; all federal contractors who have provided DEI training or DEI training materials to agency or department employees; and all Federal grantees who received Federal funding to provide or advance DEI, DEIA, or “environmental justice” programs, services, or activities since January 20, 2021.

**3/27/25 Update:** On February 21, a federal judge issued a [memorandum opinion](#) and [granted](#) the preliminary injunction in large part, enjoining implementation of the Termination Provision of EO 14151 and of the Certification and Enforcement Threat Provisions of EO 14173. Judge Adam Abelson of the United States District Court for the District of Maryland [filed](#) that the policy violates the First Amendment as it penalizes

private organizations based on their beliefs. On Feb. 24, the Defendant submitted a [notice](#) of appeal to the Fourth Circuit. On Mar. 3, Judge Abelson denied the Defendants' motion to stay the injunction pending an appeal. On Mar. 10, Judge Abelson granted Plaintiff's motion to clarify the scope of the injunction, such that it applies not only to "persons in active concert or participation with defendants," but to all federal executive branch agencies. On Mar. 14, the Fourth Circuit [granted](#) the government's petition for a stay of the preliminary injunction pending appeal.

## **Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Executive Order 14173) - signed on January 21, 2025**

This [EO](#) orders "all executive departments and agencies to terminate all discriminatory and illegal preferences, mandates, policies, programs, activities, guidance, regulations, enforcement actions, consent orders, and requirements" and orders "all agencies to enforce our longstanding civil-rights laws and to combat illegal private-sector DEI preferences, mandates, policies, programs, and activities." The EO rescinds three EOs (issued in 1994, 2011, and 2014) and one presidential memorandum (from 2016), covering policies related to discrimination in the federal workforce and in federal contracting and spending. The EO also rescinds [EO 11246](#), signed by former President Lyndon Johnson in 1965, which established requirements for non-discriminatory practices in hiring and employment on the part of U.S. government contractors. This rescission becomes effective on April 20, 2025. The EO bars the Office of Federal Contract Compliance Programs from pushing federal contractors to balance their workforce based on race, sex, gender identity, sexual preference, or religion. The EO also directs the Attorney General to publish a report by May 21, 2025, "containing recommendations for enforcing Federal civil-rights laws and taking other appropriate measures to encourage the private sector to end illegal discrimination and preferences, including DEI." The EO also mandates the Attorney General and the Secretary of Education, by May 21, 2025, issue joint guidance to all state and local educational agencies that receive federal funds, as well as all institutions of higher education that receive federal grants or participate in the Federal student loan assistance program, regarding the measures and practices required to comply with the Supreme Court's 2023 decision in [Students for Fair Admissions v. Harvard](#).

The EO requires the head of each federal agency to include in every contract or grant award: "A term requiring the contractual counterparty or grant recipient to agree that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the government's payment decisions for purposes of section 3729(b)(4) of title 31, United States Code; and a term requiring such counterparty or recipient to certify that it does not operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws." Additionally, the OMB Director is required to "excise references to DEI and DEIA principles, under whatever name they may appear, from Federal acquisition, contracting, grants, and financial assistance procedures to streamline those procedures, improve speed and efficiency, lower costs, and comply with civil-rights laws; and Terminate all 'diversity,' 'equity,' 'equitable decision-making,' 'equitable deployment of financial and technical assistance,' 'advancing equity,' and like mandates, requirements, programs, or activities, as appropriate."

Local governments' existing (and future) involvement with federal contractors utilized to conduct work on projects funded with federal investment in their communities could be impacted by this EO. The EO also explicitly states, "This order does not prevent State or local governments, Federal contractors, or Federally-funded State and local educational agencies or institutions of higher education from engaging in First Amendment-protected speech."

**3/27/25 Update:** On February 21, a federal judge issued a [memorandum opinion](#) and [granted](#) the preliminary injunction in large part, enjoining implementation of the Termination Provision of EO 14151 and of the Certification and Enforcement Threat Provisions of EO 14173. Judge Adam Abelson of the United States District Court for the District of Maryland [filed](#) that the policy violates the First Amendment as it penalizes private organizations based on their beliefs. On Feb. 24, the Defendant submitted a [notice](#) of appeal to the Fourth Circuit. On Mar. 3, Judge Abelson denied the Defendants' motion to stay the injunction pending an appeal. On Mar. 10, Judge Abelson granted Plaintiff's motion to clarify the scope of the injunction, such that it applies not only to "persons in active concert or participation with defendants," but to all federal executive branch agencies. On Mar. 14, the Fourth Circuit [granted](#) the government's petition for a stay of the preliminary injunction pending appeal.

### **1/30/25 UPDATE: Removing Barriers to American Leadership in Artificial Intelligence ([Executive Order 14179](#)) - signed on January 23, 2025**

This [EO](#) "revokes certain existing AI policies and directives that act as barriers to American AI innovation" and sets forth that it "is the policy of the United States to sustain and enhance America's global AI dominance in order to promote human flourishing, economic competitiveness, and national security." No later than July 22, 2025, the Assistant to the President for Science and Technology (APST), the Special Advisor for AI and Crypto, and the Assistant to the President for National Security Affairs (APNSA) are required to develop and submit to the President an action plan to achieve the aforementioned policy. The EO requires these officials to review all policies, directives, regulations, orders, and other actions taken pursuant to the revoked [EO 14110](#) ("Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence"; issued on October 23, 2023 and revoked on January 20, 2025) and identify any actions taken pursuant to EO 14110 that are or may be inconsistent with, or present obstacles to, the policy set forth by this new EO.

This EO could ultimately result in policy that has impacts to public entities and their utilization of artificial intelligence.

### **1/30/25 UPDATE: Council to Assess the Federal Emergency Management Agency ([Executive Order 14180](#)) - signed on January 24, 2025**

This [EO](#) establishes a council comprised of senior disaster response leadership personnel from the federal government, and outside of the federal government, in order to advise the President on potential reforms to FEMA. The Secretary of Defense and Secretary of Homeland Security are co-chairs of the council, and two vice-chairs may be chosen by these secretaries from among the non-federal personnel to assist in the leadership of the council. The President will appoint the remaining members of the council, up to twenty members in total, and including non-federal members who "shall have diverse perspectives and expertise in disaster relief and assistance, emergency preparedness, natural disasters, Federal-State relationships, and budget management". The Council is directed to report to the President on a variety of factors and metrics related to FEMA's performance, including but not limited to: an analysis of FEMA's response to disasters during the Biden administration; a comparison of FEMA's response efforts to those of comparable state, local, and private sector responses; recommended improvements to FEMA; arguments for and against FEMA reform; and more. The Council and its authority, per the EO, will terminate no later than January 24, 2026, though the President may order it extended. The Council is required to hold its first public meeting no later than April 24, 2025, and submit its report to the President no later than July 23, 2025.

FEMA has faced significant public scrutiny over its role in responding to recent disasters, particularly Hurricane Helene and Hurricane Milton, which devastated the Southeastern and Mid-Atlantic regions, and the recent Los Angeles wildfires. During visits to areas of North Carolina impacted by hurricanes, President Trump discussed the possibility of overhauling or eliminating FEMA, and complained that FEMA had been too slow, and too mired in red tape, to adequately respond to disasters. At this point, it is uncertain what specific reforms to FEMA may look like, though the advisory council formed by this EO will clearly play a significant role in any such reforms.

**2/27/25 Update:** On February 21, the Department of Homeland Security (DHS) published in the Federal Register a “[notice of establishment](#)” of the new Federal Emergency Management Agency Review Council. The notice, dated February 18, merely summarizes the intent of the new FEMA Review Council and indicates that the notice “is not a solicitation for membership.” For further information on the FEMA Review Council, Mr. Patrick Powers may be contacted at 202-891-2283; [FEMAreviewcouncil@hq.dhs.gov](mailto:FEMAreviewcouncil@hq.dhs.gov).



### **1/30/25 UPDATE: Ending Radical Indoctrination K-12 Schooling ([Executive Order 14190](#)) - signed on January 29, 2025**

This [EO](#) directs federal agencies to enforce laws protecting parental rights in education while preventing federally funded schools from promoting gender ideology and race-based equity initiatives. It claims that certain school practices violate civil rights laws, fostering division and undermining parental authority. The order mandates the creation of an "Ending Indoctrination Strategy" by the Departments of Education, Defense, and Health and Human Services, in consultation with the Attorney General, which is due to the president within 90 days of the EO's signing. The EO states that the strategy must identify and eliminate federal funding for K-12 programs promoting gender ideology or race-based equity training. It also directs legal action against schools that support gender transitions for minors without parental consent.

Additionally, the order reinstates the 1776 Commission, previously disbanded in 2021, to advance patriotic education and historical instruction that aligns with the principles outlined in the directive. This commission will develop initiatives such as the Presidential 1776 Award, designed to recognize students' knowledge of American history, and will provide guidance to federal agencies on ensuring that historical education at national parks, battlefields, and museums aligns with this educational framework. It also mandates that all federally funded schools comply with existing requirements to observe Constitution Day by providing educational programs on the U.S. Constitution every September 17. The 1776 Commission will expire in two years.

This EO could impact Local Education Agencies/School Districts (LEA) and State Education Agencies (SEA), by tying federal funding to compliance with new curriculum and parental oversight. Federal agencies may scrutinize grant recipients, requiring state and local education agencies to align with new directives or risk losing funding. LEAs and SEAs may need to revise curricula and teacher training to reflect patriotic education principles while ensuring increased parental oversight in student policies and records. The order also introduces legal risks, directing the Attorney General to coordinate enforcement against schools and educators who implement gender identity discussions or equity-focused programs. This places local governments in a challenging position, navigating conflicts between state laws and federal mandates.



## **1/30/25 UPDATE: Expanding Educational Freedom and Opportunity for Families ([Executive Order 14191](#)) - signed on January 29, 2025**

This [EO](#) outlines various initiatives to support parents' choice and direction of their children's education. Specifically, the order directs the Secretary of Education, within 60 days of signing the order, to issue guidance regarding how states can use federal formula funds to support K-12 educational choice initiatives. Additionally, it requires the Secretary of Education and the Secretary of Labor to assess and propose ways to use discretionary grants to enhance educational freedom. There are also specific provisions for military families and children eligible for Bureau of Indian Education (BIE) schools, with plans to allow these families to use federal funds for educational alternatives. The order also emphasizes supporting low-income and working-class families in accessing various educational opportunities.

The order calls for the support of state-based K-12 education choice or scholarship programs already in more than a dozen states allowing for more choice from families. The administration also highlights concerns in the current educational system, such as the low proficiency rates in reading and math. The order cited this year's National Assessment of Educational Progress (NAEP), which measured that 70 percent of 8th graders were below proficient in reading and 72 percent were below proficient in math.

For local communities, the potential impact of this EO may be considerable. As states are encouraged to expand educational choice and integrate private and charter school options, local school districts could experience shifts in student enrollment patterns and funding. Regarding public school funding, the order could lead to increased competition for resources and students between public and alternative schools. Families of districts may have increased access to school choice for their children, which may lead to improved proficiency scores for students attending schools that better meet their individual needs. Local governments may need to adapt to these changes by revisiting their policies on school funding and addressing potential challenges in managing a diverse range of educational options within their communities. School advocacy groups have shared their opinions both in favor and against the EO.

## **1/30/25 UPDATE: Enforcing the Hyde Amendment ([Executive Order 14182](#)) - signed on January 24, 2025**

The EO ends the use of federal funding to sources that provide elective abortion services. The action revokes previous Executive Orders [Protecting Access to Reproductive Healthcare Services](#) (EO 10476) and [Securing Access to Reproductive and Other Healthcare Services](#) (EO 10476), both signed in 2022.

EO 10476 required the Secretary of Health and Human Services to issue a report identifying means to protect and expand access to abortion, a full range of reproductive health and family planning services, increase reproductive healthcare access, affordability and education, and ensure protections for pregnant people—including those experiencing medical emergencies, under the [Emergency Medical Treatment and Labor Act](#).

Executive Order 10476 directed the Attorney General and the Secretary of Homeland Security to identify means to protect clinics, pharmacies, and other entities providing reproductive healthcare services. It encourages the Chair of the Federal Trade Commission and the Secretary of Health and Human Services to consider actions, as appropriate and consistent with applicable law, to maintain the privacy of individuals against data sales, surveillance or fraudulent activities.

The order established a Reproductive Healthcare Access Task Force to coordinate efforts and address barriers to care. The Attorney General was to also provide guidance on federal constitutional protections to states seeking to offer legal protections to out-of-state reproductive healthcare patients and providers.

[Executive Order 14079](#) was signed in response to the June 24, 2022 Supreme Court decision overturning the *Roe v. Wade* ruling. The order directs the Secretary of Health and Human Services to consider means to advance reproduction healthcare access, including through Medicaid and across state lines, and as applicable with federal law.

The order also requests consideration of actions to enhance understanding of and compliance with nondiscrimination laws for healthcare providers receiving federal funding. The Secretary of Health and Human Services was directed to evaluate the efficacy of data collection on reproductive healthcare access maternal health outcomes and take actions to improve the outcomes.

### **1/30/25 UPDATE: Reevaluating and Realigning United States Foreign Aid ([Executive Order 14169](#)) - signed on January 20, 2025**

This [EO](#) directs relevant agencies to place a 90 day pause on foreign assistance—with the caveat that the Secretary of State, in consultation with the Office of Management and Budget, can approve exceptions—and orders an “assessment of programmatic efficiencies and consistency with United States foreign policy.” Following each review during the three-month period, the relevant agencies will need to recommend whether the specific aid program should continue, be modified, or terminated.

The U.S. spends tens of billions of dollars a year on foreign aid programs which go to many countries around the world. The pause directed by this EO is a part of the President’s commitment to have an “America First” foreign policy, which includes increased scrutiny of assistance programs that don’t have a clear benefit to American citizens. While this order temporarily halts aid to other countries, much of the US foreign assistance apparatus is based in the U.S., including government employees and global nonprofits that manage these programs. As such, a broader reevaluation and realignment that cuts foreign aid spending will also be felt here in the U.S.



### **1/30/25 UPDATE: Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government ([Executive Order 14168](#)) - signed on January 20, 2025**

President Trump signed an [EO](#) establishing clear language and policies recognizing two sexes, male and female. This order directs federal agencies to interpret and enforce existing sex-based laws and criteria using the following definitions of “sex” and those for the two recognized sexes:

- “(a) “Sex” shall refer to an individual’s immutable biological classification as either male or female. “Sex” is not a synonym for and does not include the concept of “gender identity.”
- (b) “Women” or “woman” and “girls” or “girl” shall mean adult and juvenile human females, respectively.
- (c) “Men” or “man” and “boys” or “boy” shall mean adult and juvenile human males, respectively.
- (d) “Female” means a person belonging, at conception, to the sex that produces the large reproductive cell.
- (e) “Male” means a person belonging, at conception, to the sex that produces the small reproductive cell.”

The EO directs federal agencies to revise policies to align with sex-based definitions and eliminate references to gender identity where they conflict with these definitions. This order instructs the Department of Health and Human Services to provide the U.S. government and external partners with guidance on implementing these sex-based definitions. In addition, it requires each agency and all federal employees to enforce sex-based rights and protections in accordance with these definitions. The order requires all federal agencies and employees to use the term 'sex' rather than 'gender' in all applicable policies and documents. This includes ensuring that government-issued identification documents, such as passports, visas, and Global Entry cards, accurately reflect the holder's 'sex' as defined by this order. This EO directs the Attorney General and federal law enforcement agencies to ensure that individuals are housed in detention facilities based on their biological sex, preventing men from being detained in women's facilities and women from men's facilities. Finally, the order rescinds previous EOs and documents that are inconsistent with the policy set by this EO.

While this EO applies to federal agencies, its impact may extend to interactions with state and local entities that recognize gender identities beyond male and female. This could lead to inconsistencies when state-issued documents recognize nonbinary or other gender-identifiers, but federal agencies require binary sex-based identification. Because state-issued identification (e.g., driver's licenses) is often used as proof for federal identification documents, such as passports and visas, individuals with nonbinary markers may face discrepancies when applying for federal identification, which recognizes only "male" or "female." This policy may also create challenges in federal databases used by state and local agencies, potentially leading to inconsistencies in identification records.

### **2/6/25 UPDATE: Immediate Assessment of Aviation Safety ([Presidential Memorandum](#)) - signed on January 30, 2025**

Following the tragic mid-air collision between a commercial aircraft and a military helicopter near Ronald Reagan Washington National Airport on January 29, 2025, the President has issued this [memorandum](#) emphasizing the need for aviation safety reforms. The order highlights concerns over past changes to hiring policies within the Federal Aviation Administration (FAA) that may have impacted safety standards. It calls for a renewed focus on merit-based recruitment and promotion to ensure that the highest levels of competence and safety are maintained within the FAA. The President underscores the importance of prioritizing objective qualifications in aviation-related roles to enhance overall safety in air travel.

The memorandum directs the Secretary of Transportation and the FAA Administrator to conduct a comprehensive review of all hiring and safety protocol changes made in the past four years. This review will assess any potential impacts on aviation safety and implement necessary corrective actions, including personnel adjustments where needed. The directive aligns with a previously issued Presidential Memorandum on aviation safety and seeks to reinforce policies that prioritize public safety. The administration aims to restore confidence in air travel by ensuring the FAA operates with the highest standards of excellence and safety.

### **2/6/25 UPDATE: Keeping Men Out of Women's Sports ([Executive Order 14201](#)) - signed on February 5, 2025**

This EO is aimed at restricting the participation of transgender athletes in women's sports at federally funded educational institutions. The order directs the Department of Education to enforce Title IX protections by ensuring that women's sports are reserved exclusively for biological females. It mandates that federal grants be reviewed and potentially rescinded from educational programs that do not comply with this policy. The

order also prioritizes enforcement actions against schools and athletic organizations that allow transgender women to compete in women's sports or require female athletes to share locker rooms with transgender individuals. Additionally, it calls for collaboration with state attorneys general, athletic governing bodies, and international organizations to establish policies that prevent transgender participation in female sports at national and international levels, including Olympic competitions.

State and local governments could see policy and funding implications as a result of this order. Educational institutions receiving federal funding may need to modify their athletic policies to comply with federal directives, potentially leading to conflicts with existing state laws that allow transgender participation in sports. States with laws protecting transgender athletes could face federal funding reductions for noncompliance, impacting school districts and public universities. Local governments that manage athletic programs or facilities may also need to align policies with federal guidelines, which could lead to legal challenges and administrative hurdles. Additionally, the order's directive to state attorneys general may influence how states enforce policies related to gender identity and sports participation, potentially leading to new state-level legislation or legal disputes.

### ★ **2/13/25 UPDATE: Protecting Second Amendment Rights ([Executive Order 14206](#)) - signed on February 7, 2025**

The Trump administration referred to the protection of the Second Amendment as “foundational to maintaining all other rights held by Americans.” This [EO](#) directs the Attorney General by 30 days after the order (March 9, 2025) to review and examine all actions, including orders, regulations, guidance, plans, and agreements of all departments and agencies, to identify any infringements of the Second Amendment rights to U.S. citizens. Following the review, the EO directs the Attorney General to propose a plan of action to the President through the Domestic Policy Advisor, ensuring that all rights of the Second Amendment are protected. Specifically, the Attorney General has guidance to review all presidential and agency actions from 2021 to 2025 during the Biden administration, regulations and orders pertaining to firearms and licensees, and any positions in ongoing or prospective litigation with Second Amendment implications. The Attorney General and the Domestic Policy Advisor will collaborate to create a process of implementation.

The Trump administration's review, led by the Attorney General, could lead to further review of federal actions impacting local policies regarding firearms, gun safety, and enforcement. While unclear, the EO and subsequent plan of action could force local governments to adjust or realign their policies with new findings or guidance issued by the Trump administration to remain in compliance with the policies and regulations. Local governments may need to increase levels of coordination with federal government agencies and departments to ensure all current policies meet Second Amendment protections set forth by the administration.

### ★ **2/20/25 UPDATE: Ensuring Accountability for All Agencies ([Executive Order 14215](#)) - signed on February 18, 2025**

This [EO](#) aims to increase presidential oversight and control over federal regulatory agencies, including independent regulatory agencies, to ensure greater accountability to the executive branch. It asserts that executive power is vested in the President and that all federal agencies, including independent regulatory agencies, must be subject to presidential supervision. The order argues that previous administrations allowed independent agencies to operate with minimal oversight, which undermined their accountability to the American people. To address this, the order mandates that all executive departments and agencies, including independent regulatory agencies, submit significant regulatory actions for review by the Office of Information

and Regulatory Affairs (OIRA) within the Executive Office of the President before publication. Additionally, the order expands the Office of Management and Budget's (OMB) authority over independent regulatory agencies by establishing performance standards, reviewing financial obligations for consistency with presidential priorities, and requiring agency leadership to consult regularly with White House policy councils.

The order could have implications for state and local governments, particularly those that interact with independent regulatory agencies on issues such as environmental regulations, financial oversight, and labor policies. By centralizing regulatory review within the Executive Office of the President, the order may slow down or alter the implementation of regulations that impact local and state-level policies. Additionally, the directive to review federal funding allocations to ensure alignment with presidential priorities could lead to shifts in grant funding and regulatory enforcement at the state and local levels. The order's provisions requiring agency heads to coordinate with the White House may also impact how states and localities engage with federal regulatory agencies, potentially creating new administrative hurdles for policy implementation.

### ★ **2/20/25 UPDATE: Radical Transparency About Wasteful Spending (Memorandum) - signed on February 18, 2025**

This [memorandum](#) directs federal agencies to increase transparency regarding government spending by publicly disclosing details of terminated programs, canceled contracts, and discontinued grants. The administration argues that taxpayer dollars have been allocated to projects that do not align with national interests, including ideological initiatives and activities of domestic and international organizations deemed counterproductive. The memo instructs agencies to release comprehensive information on discontinued federal funding obligations, ensuring compliance with applicable laws, regulations, and contractual terms.

### ★ **2/20/25 UPDATE: Establishing the President's Make America Healthy Again Commission (Executive Order 14212) - signed on February 13, 2025**

This [EO](#) establishes the "Make America Healthy Again" (MAHA) Commission, chaired by Health and Human Services Secretary Robert F. Kennedy, Jr. The Commission's primary objective is to combat the nation's escalating health challenges, particularly focusing on childhood chronic diseases such as obesity, diabetes, and mental health disorders. It aims to reassess policies related to nutrition, physical activity, environmental factors, and the quality and safety of food and drugs. Additionally, the Commission seeks to enhance transparency in scientific research and protect expert recommendations from undue influence.

No later than May 24, 2025, the MAHA Commission is tasked with delivering a comprehensive assessment of childhood chronic diseases in the United States, identifying contributing factors like diet, exposure to toxins, medical treatments, and environmental influences. Following this assessment, a strategic plan is required to be developed no later than August 12, 2025, to restructure the federal government's response to these health crises, aiming to eliminate practices that may worsen the situation and introduce effective solutions to reduce childhood chronic diseases.

The establishment of the President's MAHA Commission is poised to have significant implications for local governments. As the Commission develops strategies to combat chronic diseases, particularly among children, local authorities may be called upon to implement new health initiatives and policies. This could involve revising school nutrition programs, enhancing physical education curricula, and enforcing regulations aimed at

reducing environmental factors contributing to health issues. Local health departments might also need to collaborate closely with federal agencies to align their efforts with the Commission's recommendations.

## ★ **2/20/25 UPDATE: Keeping Education Accessible and Ending Covid-19 Vaccine Mandates in Schools ([Executive Order 14214](#)) - signed on February 14, 2025**

This [EO](#) directs the end of all COVID-19 vaccine mandates in educational settings by prohibiting federal funds from supporting any educational institution that requires students to receive the vaccine to attend in-person programs. Educational service agencies, State educational agencies, local educational agencies, elementary schools, secondary schools, and institutions of higher education are all specific entities that the order highlights. The order emphasizes the importance of empowering parents to make medical decisions for their children and young adults. It seeks to ensure that schools do not coerce students into receiving the vaccine to access education. The task is given to the Secretary of Education to issue guidelines to schools regarding parental authority, religious freedom, and equal protection. The order also calls upon the Secretaries of Education and Health and Human Services to provide the President with a plan to address non-compliant institutions and the potential rescinding of federal funds. The plan, within 90 days of its signing, will include a list of discretionary federal funding grants and contracts provided to all listed entities above that are non-compliant with the guidelines and ensure that the specific department or agency rescinds or prevents federal funds to the given educational entity.

The local impact of this executive order could be significant for both educational institutions and the communities they serve. Schools and universities that rely on federal funding will need to comply with the executive order ensuring the removal of any mandates regarding Covid-19 vaccines. If found to be non-compliant with the rules, schools and education agencies at the state and local levels could face a rescission of funds. The shifting dynamics could lead to further discussions about the role of government in educational decisions and public health.

## **2/27/25 UPDATE: Making America Healthy Again by Empowering Patients with Clear, Accurate, and Actionable Healthcare Pricing Information ([Executive Order 14221](#)) - signed on February 25, 2025**

This [EO](#) reaffirms the federal government's commitment to enhancing healthcare price transparency and ensuring universal access to clear and accurate healthcare price information. It builds upon [EO 13877](#) of June 24, 2019 (Improving Price and Quality Transparency in American Healthcare to Put Patients First), which mandated that: hospitals and health plans maintain an accessible display of healthcare service pricing; health plans disclose negotiated rates with providers, out-of-network payments to providers, and actual prices paid for prescription drugs, including those paid through pharmacy benefit managers; health plans provide consumer-facing online tools that allow individuals to access pricing information.

This EO establishes the policy of the federal government to ensure patients have access to clear and accurate healthcare pricing; strengthen enforcement of existing price transparency requirements; identify opportunities to expand and enhance price transparency, including the potential expansion of existing requirements.

To achieve these goals, the Secretaries of the Treasury, Labor, and Health and Human Services are directed to:

- (a) require the disclosure of the actual prices of items and services, not estimates;
- (b) issue updated guidance or proposed regulatory action ensuring pricing information is standardized and easily comparable across hospitals and health plans; and
- (c) issue guidance or proposed regulatory action updating enforcement policies designed to ensure compliance with the transparent reporting of complete, accurate, and meaningful data.

This reaffirmation of healthcare pricing transparency could impact municipally run healthcare services. The directives issued by the designated Secretaries may lead to changes in reporting requirements for public healthcare providers or adjustments to transparency mandates as deemed necessary. Additionally, municipally run healthcare services may need to collaborate with federal agencies to implement these requirements effectively.

### **3/20/25 UPDATE: Ensuring the Enforcement of Federal Rule of Civil Procedure 65(c) (Memorandum) - signed on March 11, 2025**

This [memo](#) directs executive departments and agencies to enforce **Federal Rule of Civil Procedure 65(c)**, which requires parties seeking injunctions against the federal government to post security covering potential costs and damages if the injunction is later found to be wrongly issued. It argues that activist organizations have been misusing injunctions to interfere with government policymaking, often without consequences. To prevent these issues, federal agencies must now request courts to enforce Rule 65(c) to ensure plaintiffs provide financial security when seeking injunctions.

The directive applies to all lawsuits against the federal government where monetary damages or costs from an injunction are expected, unless extraordinary circumstances justify an exception. The memo creates the policy now demanding that parties seeking injunctions against the federal government must cover the costs and damages incurred if the government is ultimately found to have been wrongfully enjoined or restrained. By enforcing this rule, the government aims to deter frivolous litigation, protect public resources, and uphold the proper administration of justice.

If local government or entity is named as a party against the federal government and the lawsuit is deemed as wrongly issued, the named parties (including a local government) could be held liable for costs and damages to the party where the injunction is filed.

### **3/20/25 UPDATE: Achieving Efficiency Through State and Local Preparedness ([Executive Order 14239](#)) - signed on March 18, 2025**

This [EO](#) significantly impacts state and local governments by empowering them to take a more active and central role in national resilience and preparedness efforts to address risks, including, “cyber attacks, wildfires, hurricanes, and space weather.” Key elements of the order that affect state and local governments include:

1. **Increased Responsibility for Preparedness:** The order emphasizes that state and local governments, as well as individuals, are the primary owners and managers of preparedness efforts. They are encouraged to make risk-informed decisions to prioritize and strengthen infrastructure, thereby reducing taxpayer burdens and improving local resilience.
2. **National Resilience Strategy:** No later than June 16, 2025, the federal government will develop a National Resilience Strategy, which will provide guidance on priorities and actions to enhance

- resilience. State and local governments will need to align their strategies and planning with these federal priorities.
3. **Policy Revisions for Critical Infrastructure and Preparedness:** No later than September 14, 2025, federal policies will be reviewed and recommendations made to the President to move from an all-hazards approach to a more tailored, risk-based framework. State and local governments must adjust their infrastructure and emergency preparedness plans to align with these changes, which will likely impact how they approach critical infrastructure investments and readiness.
  4. **National Risk Register:** The creation of a National Risk Register will identify and quantify risks to national infrastructure. This register will guide both state and federal investments, influencing local budgeting priorities and strategic planning for risk mitigation and response. The Assistant to the President for National Security Affairs (APNSA) is required to coordinate the development of a National Risk Register no later than November 13, 2025.
  5. **Improved Federal-State Communication:** The EO calls for clearer communication and coordination between federal, state, and local governments, especially in areas like emergency preparedness and national continuity. No later than September 14, 2025, the APNSA is required to review all national continuity policies and recommend to the President the revisions, rescissions, and replacements necessary to modernize and streamline the approach to national continuity capabilities and reformulate the methodology and architecture necessary to achieve an enduring readiness posture. No later than November 13, 2025, the APNSA is required to review all national preparedness and response policies and recommend to the President the revisions, rescissions, and replacements necessary to reformulate the process and metrics for federal responsibility, move away from an all-hazards approach, and implement the National Resilience Strategy.
  6. **Impact on Local Autonomy:** While the order explicitly states that it will not interfere with the authority of local and state agencies, the review and modification of key policies could lead to federal directives that require significant adjustments at the state and local level.

This may require state governments to balance compliance with federal priorities while maintaining local control. Local and state governments may face increased responsibilities to align with national strategies, impacting their policy frameworks, resource allocation, and emergency management practices.

In summary, this EO shifts more responsibility to state and local governments for managing risks and building resilience while providing them with clearer guidance and federal support to enhance preparedness efforts.

Critical infrastructure policies referenced in this directive do not cover issues related to "misinformation," "disinformation," "malinformation," or "cognitive infrastructure." These topics will instead be reviewed separately in accordance with the policy outlined in Executive Order 14149, which focuses on restoring freedom of speech and ending federal censorship.

Also included for administrative review is Presidential Policy Directive 22, issued on March 28, 2013, which establishes a framework for managing National Special Security Events (NSSEs). These are major events deemed to have the potential to pose significant security risks, requiring coordinated federal, state, and local response efforts to ensure the safety and security of participants and the public. Presidential Policy Directive 22 outlines the roles and responsibilities of various agencies involved in the preparation, coordination, and response to such events.

## ★ **3/27/25 UPDATE: Improving Education Outcomes by Empowering Parents, States, and Communities ([Executive Order 14242](#)) - signed on March 20, 2025**

This [EO](#) issued by the Trump administration calls for the closure of the Department of Education, arguing that federal oversight has failed to improve student outcomes and has instead created an inefficient bureaucracy. The order emphasizes returning education authority to states and local communities, contending that the federal government's involvement, which began with the Department's establishment in 1979, has led to declining academic performance despite significant financial investment. It also highlights concerns over the Department's management of student loans, comparing it to a major bank but without the necessary resources to function effectively. The administration asserts that education policies should be locally controlled to better serve students, families, and teachers. To fully implement the shutdown of the Department of Education, President Trump will need the support of Congress to end the Department, although the administration can take steps to decrease funding.

If implemented, this executive order could have significant implications for local communities, shifting the responsibility of education funding and policy-making entirely to state and local governments. While proponents argue that this change would allow for more tailored and effective educational strategies, critics warn it could create disparities in resources, particularly in lower-income areas that rely on federal funding. Additionally, the directive includes provisions to ensure that federal education funds comply with policies restricting diversity, equity, and inclusion programs, which could further influence how states shape their education systems. Overall, the move to dismantle the Department of Education would mark a major shift in American education policy, with widespread effects on students, educators, and communities across the country.

## **3/27/25 UPDATE: Preventing Abuses of the Legal System and the Federal Court ([Memorandum](#)) - signed on March 21, 2025**

This [memo](#) emphasizes the importance of holding attorneys and law firms accountable for violating U.S. laws or rules governing professional conduct, particularly when their actions threaten national security, homeland security, public safety, or election integrity. The memo highlights specific cases of unethical behavior, including election-related misconduct and fraudulent immigration practices. It references Federal Rule of Civil Procedure 11 and Model Rule 3.1, underscoring the legal obligations of attorneys to file legitimate and well-founded claims.

The President directs the Attorney General, in consultation with any relevant senior executive official, to actively seek sanctions against attorneys and firms engaging in frivolous litigation against the Federal Government, prioritize enforcement of existing regulations governing attorney conduct, and refer any misconduct for disciplinary actions. Additionally, the Attorney General, in consultation with any relevant senior executive official, must review litigation against the Federal Government from the past eight years for potential unethical behavior, recommending further steps such as security clearance reassessment, federal contract termination where warranted, or any other appropriate actions.

This presidential memo could impact local city and county governments by increasing scrutiny and accountability, especially when they engage in litigation against the Federal Government. City and county attorneys may need to carefully reassess their litigation strategies to ensure that claims align fully with professional conduct rules, thereby avoiding any perception of frivolous or politically motivated legal actions. Additionally, past litigation involving local governments could undergo federal review, potentially resulting in

disciplinary recommendations or the reassessment of security clearances for involved attorneys. Such reviews may even affect existing federal contracts held by the attorneys or law firms representing these governments.

### **3/27/25 UPDATE: Modernizing Payments To and From America's Bank Account ([Executive Order 14247](#)) - signed on March 25, 2025**

This [EO](#) aims to streamline the mechanism by which funds are transferred to and from the U.S. States Treasury's General Fund. The EO aligns closely with the Administration's efforts elsewhere to combat waste, fraud, and abuse, particularly via technology modernization. The EO orders the Treasury and other federal agencies and departments to end the use of paper checks and receipts systems and begin the process of implementing Electronic Fund Transfer (EFT) systems like direct deposit, digital payments, and more. Agencies, including the Treasury, are given 90 days to submit a compliance plan to the Office of Management and Budget, detailing their plans to implement electronic payment systems "as soon as practicable". Notably, the EO explicitly states that the implementation of digital payment systems will be made "to the extent permissible under applicable law (but not, for avoidance of doubt, to establish a Central Bank Digital Currency)." The latter part of this statement aims to assuage doubts over the Administration's efforts to promote cryptocurrency, including the possibility of having a centralized "official" cryptocurrency or otherwise digital asset of the United States.

Generally, we expect that this transition will have a minimal immediate impact on operations for our clients and other entities. We anticipate that the implementation of these electronic payment systems will bring some measure of efficiency for federal grant and loan recipients and make such transactions with the Federal government more akin to that of a commercial bank in terms of payment mechanics. As more specifics regarding changes to federal payment systems become available, it will become more apparent what challenges or impediments – or efficiencies – can be expected. The EO also directs the Treasury to work jointly with financial institutions to "address financial access for unbanked and underbanked populations". In theory, the implementation of EFT systems should make it easier for the federal government to track inlays and outlays from the Treasury, another express purpose of the order.

### **3/27/25 UPDATE: Protecting America's Bank Account Against Fraud, Waste, and Abuse ([Executive Order 14249](#)) - signed on March 25, 2025**

This [EO](#) directs the Treasury Department to update guidance and enhance systems across the Federal Government to ensure that all payments made on behalf of agencies undergo pre-certification verification to prevent fraud and improper payments. In order for Treasury to disburse funds, agency heads must comply with Treasury disbursement requirements, which include ensuring that sufficient funds are available before obligations are incurred, verifying payee information, standardizing information reporting formats, confirming funds are being disbursed from appropriate sources, and implementing other verification and certification measures. The heads of all agencies shall submit a compliance plan to the OMB Director no later than June 23, 2025 detailing their strategy for achieving the aims of the EO. The Secretary of the Treasury shall submit an implementation report to the President no later than September 21, 2025 detailing progress on the matters set forth in this EO.

Under this EO, agencies are required to share relevant data with Treasury to enhance Treasury's ability to detect and prevent fraud, subject to applicable law. Agencies will consolidate core financial systems, including for non-CFO Act agencies, consolidating transactional financial management services under standardized solutions to improve financial reporting and traceability. No later than September 21, 2025, the OMB Director

is required to issue guidance that directs agencies to consolidate their core financial systems and also issue guidance directing all non-CFO Act agencies to consolidate transactional financial management services under a single provider approved by Treasury. Non-Treasury Disbursing Offices (NTDOs) will be reduced as appropriate, with Treasury developing a plan to centralize and manage payments previously handled by NTDOs.

This EO could impact public entities, including local and county governments, by delaying direct financial payments made by the federal government due to additional pre-certification verification requirements created by this EO for all federal agencies.

## Rescinded Executive Actions from the Biden Administration



### Initial Recissions of Harmful Executive Orders and Actions ([Executive Order 14148](#)) - signed on January 20, 2025

On January 20, 2025, President Donald Trump issued an EO rescinding a comprehensive set of policies, EOs, and memoranda implemented during President Joe Biden's administration, 78 in total. The stated aim is to reverse what the order describes as "radical, inflationary, illegal, and divisive" practices and replace them with measures emphasizing merit, deregulation, national security, and economic growth.

#### Purpose and Policy

The EO asserts that the Biden Administration's policies:

1. Corrupted institutions with diversity, equity, and inclusion (DEI) programs, undermining merit and equality.
2. Compromised public safety by enacting open-border immigration policies.
3. Burdened businesses and increased inflation through climate-focused regulations.
4. Adopted initiatives deemed detrimental to American prosperity and national unity.

The Trump administration's stated goal is to restore "common sense" governance and prioritize policies that benefit the American people.

#### Details of Revoked Policies

The order specifically rescinds **78 executive actions** signed between January 20, 2021 and January 20, 2025, spanning multiple policy areas. Some noteworthy reversals include:

##### Diversity, Equity, and Inclusion (DEI):

- [Executive Order 13985 \(Advancing Racial Equity\)](#): Terminated federal initiatives to improve racial equity and support underserved communities.
- [Executive Order 14035 \(DEI in the Federal Workforce\)](#): Eliminated programs promoting diversity, equity, inclusion, and accessibility in hiring and workforce practices.

**Climate and Environmental Policies:**

- [Executive Order 13990 \(Climate Crisis Response\)](#): Ended climate-related actions such as revoking Trump-era environmental deregulations and rejoining the Paris Climate Agreement.
- [Executive Order 14008 \(Tackling the Climate Crisis\)](#): Nullified comprehensive federal strategies to combat climate change domestically and internationally.
- [Executive Order 14030 \(Climate-Related Financial Risk\)](#): Rescinded efforts to integrate climate risk into financial and economic policy decisions.

**Immigration Policies:**

- [Executive Order 14010 \(Regional Framework for Migration\)](#): Reversed policies addressing migration causes and asylum processing reforms.
- [Executive Order 14011 \(Reunification of Families\)](#): Terminated the task force responsible for reuniting families separated at the border.
- [Executive Order 14012 \(Restoring Legal Immigration Systems\)](#): Repealed measures to strengthen legal immigration pathways and improve integration efforts for new Americans.

**COVID-19 Pandemic Response:**

- Multiple executive orders addressing the pandemic were rescinded, including:
  - [Executive Order 13987 \(Unified COVID-19 Response\)](#): Dismantled efforts to provide a coordinated federal response to the pandemic.
  - [Executive Order 13995 \(Equitable Pandemic Response\)](#): Ended initiatives aimed at equitable distribution of pandemic-related resources.
  - [Executive Orders 13996-14000](#): Terminated programs for COVID-19 testing, vaccinations, workplace safety, and school reopenings.

**Healthcare Policies:**

- [Executive Order 14009 \(Strengthening Medicaid and the Affordable Care Act\)](#): Revoked actions expanding healthcare coverage under Medicaid and the ACA.
- [Executive Order 14070 \(Affordable, Quality Health Coverage\)](#): Nullified measures to increase Americans' access to affordable healthcare.

**Labor and Worker Protections:**

- [Executive Order 14003 \(Protecting the Federal Workforce\)](#): Repealed protections for federal employees.
- [Executive Order 13999 \(Protecting Worker Health and Safety\)](#): Rescinded workplace safety measures related to COVID-19.
- [Executive Order 14055 \(Nondisplacement of Qualified Workers\)](#): Ended protections for workers under federal service contracts.

**Criminal Justice Reform:**

- [Executive Order 14006 \(Reforming Incarceration Systems\)](#): Reversed efforts to eliminate the use of privately operated criminal detention facilities.
- [Executive Order 14074 \(Policing and Criminal Justice Practices\)](#): Rescinded initiatives to promote effective and accountable policing.

**Economic and Infrastructure Policies:**

- [Executive Order 14002 \(Economic Relief During COVID-19\)](#): Ended pandemic-related economic relief efforts.
- [Executive Order 14052 \(Infrastructure Investment and Jobs Act Implementation\)](#): Repealed measures supporting infrastructure development tied to Biden's signature legislation.

**Social and Cultural Initiatives:**

- [Executive Orders 14019-14021](#): Rescinded policies promoting access to voting and ensuring non-discrimination in education and federal programs.
- [Executive Orders 14031, 14045, 14049, 14050, and 14124](#): Terminated initiatives advancing equity and opportunities for minority groups, including Asian Americans, Native Americans, and Black Americans.

**International Relations:**

- [Executive Order 14022 \(International Criminal Court Emergency Termination\)](#): Reinstated opposition to U.S. involvement in the International Criminal Court.
- [Presidential Memoranda on Arctic Oil Leasing](#): Reauthorized oil and gas leasing in previously restricted Arctic areas.

**Technology and AI Oversight:**

- [Executive Order 14110 \(Artificial Intelligence Governance\)](#): Repealed measures for artificial intelligence's safe and trustworthy development.

**Implementation**

- Federal agencies are instructed to end implementing policies tied to the revoked orders.
- The Domestic Policy Council and National Economic Council will review additional Biden-era actions and recommend further rescissions.
- The National Security Advisor will evaluate National Security Memoranda issued from January 20, 2021 through January 20, 2025 for potential harm to national security.

## ★ **3/20/25 UPDATE: Additional Rescissions of Harmful Executive Orders and Actions ([Executive Order 14236](#)) - signed on March 14, 2025**

This [EO](#) specifically rescinds **18 executive actions** signed by former President Joe Biden between January 20, 2021 and January 20, 2025, spanning multiple policy areas, in order “to advance the policy of the United States to restore common sense to the Federal Government and unleash the potential of American citizens.” Some noteworthy reversals include:

- [Executive Order 13994 \(Ensuring a Data-Driven Response to COVID-19 and Future High-Consequence Public Health Threats\)](#): Rescinds directives to the Department of Health and Human Services (HHS) secretary and other federal agencies to spearhead “work on COVID-19 and pandemic-related data issues” and to “deter the spread of misinformation and disinformation.” EO 13994 also required the HHS Secretary to issue a report summarizing the interoperability of public health data systems and analyze mortality data from state, local and tribal governments.

- [Executive Order 14026](#) (**Increasing the Minimum Wage for Federal Contractors**): Rescinds the \$15/hour minimum wage requirement in place since April 27, 2021, for employees of federal contractors (it has since increased to \$17.75/hour).
- [Executive Order 14081](#) (**Advancing Biotechnology and Biomanufacturing Innovation for a Sustainable, Safe, and Secure American Bioeconomy**): Rescinds policies intended to advance engineering biotechnology and biomanufacturing toward innovative solutions in health, climate change, energy, food security, agriculture, supply chain resilience, and national and economic security.
- [Executive Order 14112](#) (**Reforming Federal Funding and Support for Tribal Nations to Better Embrace Our Trust Responsibilities and Promote the Next Era of Tribal Self-Determination**): Rescinds policies meant to expand tribal self-determination across the 574 federally recognized tribes by making it easier for Native Americans to access federal funding and have greater autonomy over how to use the federal funds.
- [Executive Order 14119](#) (**Scaling and Expanding the Use of Registered Apprenticeships in Industries and the Federal Government and Promoting Labor-Management Forums**): Rescinds policies intended to expand the use of government-registered apprentices through federal contracts and grant programs.
- [Executive Order 14126](#) (**Investing in America and Investing in American Workers**): Rescinds policies intended to promote strong labor standards on projects receiving federal funds through the signature Biden-era economic investments, including ARPA, IJJA, CHIPS, and the IRA.

## Trump Administration Appointments (Administrative Orders)

President Trump nominated the following individuals to be members of his [cabinet](#). In addition, [sub-level cabinet](#) nominees are listed. The Trump administration also named [acting cabinet](#) and [acting chair](#) positions.