Social Justice Brief

DEVELOPED BY:
Mel Wilson, LCSW, MBA
Senior Policy Advisor
National Association of Social Workers

Project 2025 on Social Safety Net: A Social Work Perspective



The primary mission of the social work profession is to enhance human well-being and help meet the basic human needs of all people, with particular attention to the needs and empowerment of people who are vulnerable, oppressed, and living in poverty.

NASW
National Association of Social Workers

750 First Street NE, Suite 800
Washington, DC 20002-4241
socialworkers.org

The National Association of Social Workers (NASW) is the largest membership organization of professional social workers in the United States. NASW works to enhance the professional growth and development of its members, to create and maintain professional standards, and to advance sound social policies.

Project 2025 on Social Safety Net: A Social Work Perspective

The Heritage Foundation's Presidential Transition Project, also known as Project 2025, seeks to fundamentally reshape federal government policies across various sectors, including social safety nets, civil rights, and environmental protection. This initiative poses a substantial threat to social justice, as it also includes measures that would roll back regulatory protections, reduce social welfare programs, and dismantle the federal civil service system. This policy brief examines the potential impacts of Project 2025 and both the far-reaching consequences for vulnerable populations and the broader implications for social equity and justice.

In the midst of our nation's most contentious fight to sustain America as a democracy, the Heritage Foundation—an organization known to be comfortable with autocratic approaches to governing—in April of 2023 publicly introduced its Mandate for Leadership: The Conservative Promise. The aggressive, almost defiant way in which the Heritage Foundation went about making this document public suggested they were looking for a public confrontation with those who opposed their agenda. Unsurprisingly the Project 2025 blueprint got the attention of many social justice and human rights organizations, and those whose mission is to protect democracy.

It should be noted that, while the Heritage Foundation is at the center of this controversy, it is not the only far-right think tank planning a second Trump administration. In fact, the America First Policy Institute (AFPI) has spent several years developing a detailed radically conservative public policy blueprint, similar to Project 2025. Thus, we should not be surprised by these efforts of well-funded, well-organized groups who are experts on governmental personnel policies, bureaucratic structure and operations, and the process of controlling governmental functions, to circumvent congressional oversight.

Background of the Project 2025 Worldview

The leaders of Project 2025 believe that government—with its layered bureaucracy and regulation stifles free markets and individual freedoms is not new. However, more recently, he anti-government movement has coalesced around the idea that a shadowy administrative state has stealthily taken over the federal government, The enemy, according to adherents of the administrative state point of view, is President Roosevelt's New Deal of the 1930s and 1940s.

Over time, this view of government morphed into a national movement that became committed to deconstructing the administrative state. Project 2025's aim is to see Trump elected president in 2024, and to begin implementation of the deconstruction in as soon as he is in office.

It is important to mention that the concept of the administrative state, during the Franklin Roosevelt administration, initially represented the idea of a federal government infrastructure that prioritizes both economic stability and providing social welfare for its citizens. Such an interpretation assumes a higher degree of government intervention and oversight to ensure public welfare, economic stability, and social justice—with a premium placed on social equity through programs such as unemployment insurance, social security, and healthcare.

What must be reiterated and fully appreciated about Project 2025 is that the Heritage Foundation and the over 100 contributors who wrote the document saw themselves as the vanguard that would finally and completely transform how the government operates. The blueprint's introduction in April 2023 was timed to be operationalized so that the newly elected Trump administration would "hit the ground running" in deconstructing the administrative state. Moreover, the Project 2025 strategic plan envisions—once the transformation is complete—far-right engineered social and regulatory policies that will last for many decades.

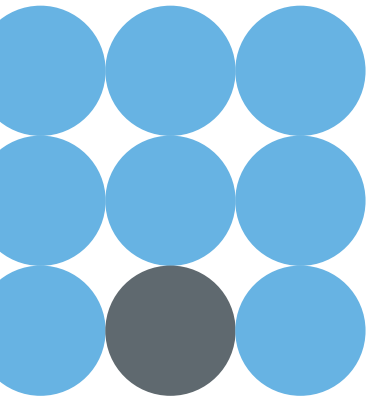
With that in mind, once the degree to which Project 2025 has embraced a concept of autocratic governance became clear, many social justice and human rights organizations raised an alarm. These groups expressed profound concerns about the consequences of such an autocratic approach to managing government agencies will have on marginalized and vulnerable Americans. They subsequently mobilized to inform the public of this threat.

What Will the Impact of Project 2025 Be? Why Should We Be Concerned?

Once the fine print was made clear, many Americans began to realize that the plan poses a threat to return Americans, especially those from communities of color and the low to moderate income population, to the late 19th/mid-20th century, a time of robber barons, Jim Crow laws, and a lack of a social safety net.

Project 2025 is essentially a manifesto—over 900 pages long—that covers nearly every aspect of the federal government structure. In particular, the blueprint includes comprehensive steps for restructuring the federal bureaucracy. As a result, the organizational structure will be such that the directors of all major departments would be filled by individuals with unquestionably loyalty to the far-right agenda—and to former president Trump.

For the purposes of this discussion, the concern is that those departments and regulatory agencies that are responsible for managing safety net programs, civil rights protections, and environmental safety would—directly or indirectly—be micromanaged by the Trump White House. Most notably, these departments include the Department of Agriculture (USDA), Department of Health and Human Services



(HHS), Department of Housing and Urban Development (HUD), Department of Education, Department of Homeland Security, Internal Revenue Service (IRS), and Department of Justice (DOJ).

When we realize that 100 million Americans, one way or another, depend on or benefit from social safety net, environmental, and civil rights protections, managed by the "administrative state," we can see how devastating dismantlement — and far-right micromanagement—of these departments could be. Following ultraconservative social policies based on Project 2025's recommendations would lead to the demise of New Deal and Civil Rights Era protections for vulnerable and marginalized Americans.

Department of Agriculture

Critical federal programs meant to support people experiencing economic hardship and children living in poverty would be significantly overhauled or eliminated under the plan. Within the USDA, Project 2025 affects the Supplemental Nutrition Assistance Program (SNAP, or food stamps) the most. For instance:

- SNAP is the country's largest nutritional assistance program, serving an average of around 41 million people—or over 10 percent of the population—per month.
- The Project 2025 reforms would make it more difficult for people to qualify for food stamps.
- The project also wants to roll back changes made by the Biden administration to increase SNAP benefits over 10 years to keep up with rising food costs.
- Project 2025 advises the Trump administration to make work requirements more stringent so that fewer recipients can be given a work requirement exemption. USDA estimated that the stringent work requirements would result in about 688,000 people who would lose their SNAP benefits.
- The work requirement recommendation is essentially the same change that the Trump administration sought during his first term—the change did not become policy due to being sued by a coalition of states and D.C.
- The project also plans to make it harder for people to qualify for SNAP benefits if they also receive aid from Temporary Assistance for Needy Families (TANF), another federally funded assistance program.
- If the SNAP eligibility requirement goes into effect, the USDA estimated that as many as 3.1 million people—or 9 percent of SNAP recipients—would lose their benefits.

Department of Education

Education in vulnerable and marginalized communities, especially for Black, Brown, and Native children, has always been underfunded and under resourced. Regardless, Project 2025 plans to eliminate the entire Department of Education and redirect the funds to a privatized education structure. The Center for American Progress (CAP) has conducted an in-depth analysis that reveal that Project 2025 seeks to eliminate funding for low-income schools, jeopardizing over 180,000 teaching positions. In particular, the blueprint would end Title I. Established in 1965, Title I was created in response to the Civil Rights Act of 1964, recognizing students' more significant educational needs in high-poverty schools and the lack of state resources. Title I supports

nearly two-thirds of public schools and low-income students.

Moreover, Project 2025 plans to disinvest in programs supporting the academic needs of vulnerable students, including those with disabilities under the Individuals with Disabilities Education Act and low-income students at Title I eligible schools. Title I, Part A of the Every Student Succeeds Act provides supplemental federal funding to ensure all children receive a fair, equitable, and high-quality education.

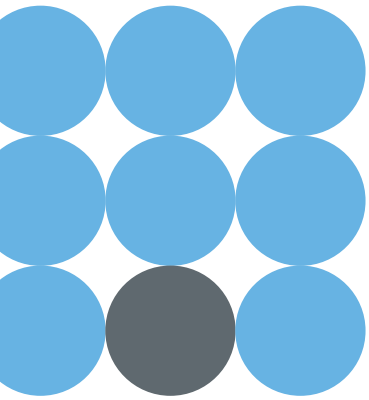
Further, Project 2025's proposal to phase out Title I reverses efforts to retain teachers, including legislation to increase teacher pay. Today, the average teacher salary in most states is below the minimum living wage, with teachers earning 5 percent less than a decade ago when adjusted for inflation. Title I funding benefits teachers and students in suburban, rural, and urban schools by providing direct student support services and enabling districts to hire and retain teachers. CAP insists that eliminating Title I funding would lead to high teacher-to-student ratios, a lack of school-based programs, and diminished quality of instruction.

Department of Homeland Security

According to the American Immigration Council, Project 2025 includes items that have long been the mainstay of Republican immigration proposals. For example:

- If elected, the incoming Trump administration would cancel the Flores settlement (which generally prevents the government from detaining children and families indefinitely).
- The administration would reinstate the "Remain in Mexico" policy of forcing non-Mexican citizens to wait in Mexico while their asylum cases are pending.
- Stiff sanctions would be imposed on countries that refuse to accept deportees from the United States.
- A new Trump administration would force states and cities that receive Federal Emergency Management Agency grants to share databases— such as that of their Departments of Motor Vehicles—with the federal government for immigration enforcement purposes.

Again, according to the American Immigration Council, the plan states that Immigration and Customs Enforcement (ICE) officials should be directed to arrest and take into custody all unauthorized immigrants with criminal records, those with prior deportation orders, and those who have been identified by local police under 287(g) agreements. Homeland Security Investigations officers would be required prioritize immigration crimes, thus freeing up ICE manpower for a deportation effort. (DOJ attorneys would similarly be urged to focus on prosecuting immigration offenses.) It is evident that all these actions set the stage for mass deportations, with just one potential barrier, related to resources and budgetary issues. Project 2025 recommends increasing ICE detention capacity to 100,000 beds—by comparison, in 2019, the Trump administration asked Congress to fund 52,000 beds. Further pressures on the budget will be caused by the project's call for loosening detention standards—which, by definition, will result in a large increase of detainees (including family detentions).



Department of Housing and Urban Development

As previous administrations have done, the Biden White House has adopted a housing-first approach to combat homelessness. However, this widely embraced strategy—getting people housed first and then addressing other needs—could be impacted by Project 2025.

We must not lose sight of the fact that homelessness is a multifaceted issue and is a growing problem among the elderly and disabled. If an incoming Trump administration moves forward on the HUD "reset" outlined in Project 2025 federal funding for programs that combat homelessness will be jeopardized. Additionally, given that there are an increasing number of cities that have enacted criminal penalties on people sleeping outside, Project 2025 could lead to increased criminalization of homelessness.

The concern about the HUD section of policy blueprint of Project 2025 is best summarized by the following quote:

> "The plans laid out in Project 2025's chapter on the Department of Housing and Urban Development will only make it harder for low income, already-disadvantaged Americans to achieve stable, safe, affordable housing—and will likely put the American dream of home ownership even further out of reach. Project 2025 really does not offer solutions to our existing housing crisis, and it furthers a period of segregation that we have seen since our founding of the country." (Dr. Andre Perry, Senior Fellow at the Brookings Institute)

Department of Health and Human Services

The concern for eliminating racial and ethnic health disparities and inequities has been a top priority of HHS for decades. In the interim, HHS has managed numerous safety net programs that are designed to address such disparities. More recently, the Patient Protection and Affordable Care Act (ACA) has become the backbone for making healthcare accessible to low- and moderate-income individuals and families. As would be expected, Project 2025 does not bypass the opportunity to tamper with the ACA and related HHS subsidized health plans with revisionist policies that undermine the program's intent. Project 2025 wants to see government funds redirected to the private insurance industry.

Medicare

Medicare is the federal government health insurance program for people aged 65 and older and younger people living with certain illnesses or disabilities. More than 67 million Americans are currently enrolled. Of particular interest to senior citizens, Project 2025 will significantly affect at least one important Medicare provision.

The blueprint proposes making Medicare Advantage—approximately half of Medicare recipients are currently enrolled in Medicare Advantage plans—the primary enrollment plan for Medicare beneficiaries. Medicare Advantage functions similarly to health insurance plans offered by private employers, in which policyholders have a defined network of providers they are allowed to visit.

The problem with the Project 2025's intent to make Medicare Advantage the default plan is that original Medicare remains a more flexible choice for many recipients. That flexibility exists because original Medicare can be used to visit the 90 percent of doctors in the United States who accept Medicare—while Medicare Advantage plans force recipients into limited provider networks. Just as significant, Medicare Advantage plans often require prior authorization for certain coverage, which exposes recipients to having needed services denied. There are no prior authorization requirements with original Medicare plans.

In truth, Medicare Advantage is an already privatized portion of the Medicare program. Project 2025 intends to fully privatize a wider spectrum of Medicare services. Unlike many of the far right's attacks on the administrative state, privatization is viewed as the default action to address what they perceive to be wrong. So, building plans such as Medicare Advantage on contracts between the federal government and private insurance companies fits the privatization philosophy. However, because insurance companies charge the federal government for patient care, Medicare Advantage costs the government and taxpayers more than original Medicare. For example, based on 2022 spending data, it is estimated that private insurance companies overcharge the federal government by as much as $140 billion annually—through Medicare Advantage plans.

Medicaid

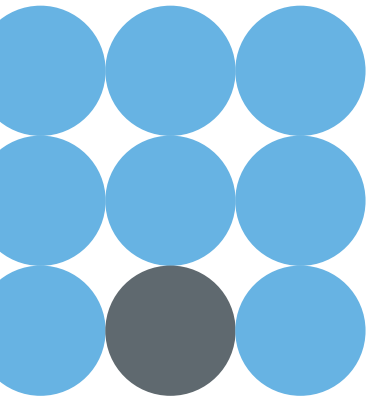
Medicaid provides healthcare coverage to nearly one in five Americans, including low-income individuals and families, children, pregnant women, elderly adults, and people with disabilities. Medicaid coverage advances access to care, as well as reduces health disparities and supports financial security.

With respect to racial and ethnic health disparities, it is important to know that in 2020, Medicaid and the Children's Health Insurance Program (CHIP) provided coverage for nearly 55 million people of color, including Black, Hispanic, and Native individuals.

- **Black Americans:** Approximately 20 percent of Medicaid enrollees are Black.
- **Hispanic Americans:** In 2019, Medicaid provided coverage to more than 16 million Latino Americans, accounting for nearly one-third of Medicaid enrollees.
- **Native Americans:** In 2018, Medicaid covered about 1.8 million American Indian and Alaska Native individuals.

Project 2025's plan for Medicaid follows a typical anti social safety net pattern of the far right, which is to treat access to health as a privilege rather than a right. As a result, the policy blueprint includes measures to "incentivize personal responsibility," which translates to the far right's fallacious assumption that safety net programs lead to a permanent dependence.

Their main approach to "incentivize personal responsibility" is to impose Medicaid coverage with "time limits" or "lifetime caps" on Medicaid benefits. In addition, the policy blueprint appears to urge that an incoming Trump administration eliminate Medicaid protections and reduce the number of mandatory services by making such services optional—which would limit current Medicaid coverage for X-ray services, rural health clinic visits, nursing home care, and early prevention and diagnostic screenings.



Project 2025 includes two other proposed changes that should give health equity advocates pause: (1) adding a work requirement, "similar to what is required in other welfare programs," and (2) raising premiums for higher-income beneficiaries. This particular change in eligibility would cause individuals and families who are close to poverty and/or experience catastrophic health crises to lose access to healthcare. Project 2025's report states that Medicaid is intended "to serve the most vulnerable and truly needy and eliminate middle-income to upper-income Medicaid recipients."

Women's Reproductive Rights and Reproductive Health

One of the most provocative issues for the upcoming presidential election is that of abortion and, in general, freedoms. Therefore, when it became known that Project 2025 included very invasive abortion and reproductive policies, the outrage was as would be expected.

An example of such an invasive policy is where Project 2025's blueprint calls for removal of the word "abortion" from all federal laws and regulations; an end to the Food and Drug Administration's approval of medication abortion; use of the Comstock Act to ban the mailing of abortion pills, to prevent reproductive health clinics from receiving shipments of supplies and equipment; and to limit access to birth control, in vitro fertilization, and surrogacy.

Perhaps the most insidious and truly invasive aspect of the blueprint is its position that requires pregnancies to be monitored. To that point, the Project 2025 blueprint calls on the federal government to mandate that states report abortions and would require the Centers for Disease Control and Prevention (CDC) to collect data and report on "complications due to abortion." Project 2025's exact language on this mandate is:

> *Because liberal states have now become sanctuaries for abortion tourism, HHS should use every available tool, including the cutting of funds, to ensure that every state reports exactly how many abortions take place within its borders, at what gestational age of the child, for what reason, the mother's state of residence, and by what method. In addition, CDC should require monitoring and reporting for complications due to abortion and every instance of children being born alive after an abortion.*

If enacted under Donald Trump, Project 2025 would withdraw the Biden administration's guidance on HIPAA (Health Insurance Portability and Accountability Act) resulting in the revocation of medical privacy protection that protects abortion patients. Additionally, under Trump, Project 2025 would weaponize the CDC by giving it the authority to withhold federal funding from states that decline to report abortion data. Revocation of HIPPA guidance on reporting abortion information would effectively indemnify states from legal actions when they track each pregnancy and require women to report all aspects of their pregnancy until birth of the child.

Internal Revenue Service

A recent analysis by the Joint Economic Committee has raised alarming concerns about the potential impact of Project 2025 on

the U.S. tax code and its far-reaching consequences for the nation's social safety net and antipoverty programs. While the healthcare and education systems have been highlighted as areas under threat, Project 2025 also poses a serious risk to crucial programs that support millions of low- and middle-income Americans.

According to an analysis of Project 2025 by the Joint Economic Committee, it calls for eliminating "most tax credits, deductions, and exclusions," but does not specify which ones. The two most popular tax credits that overwhelmingly benefit people with low and middle incomes are the Child Tax Credit (CTC) and the Earned Income Tax Credit (EITC). The EITC is the largest antipoverty program in the country and eliminating it would mean 23 million Americans would fall further into poverty.

The current CTC provides a partial tax credit to low-income families who earn at least $2,500 per year. In 2018, the credit lifted 4.3 million people out of poverty, including 2.3 million children, and lessened poverty for 5.8 million children.

Department of Justice

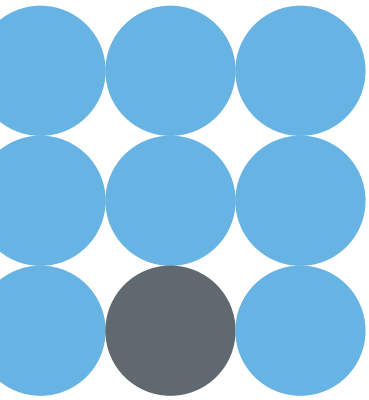
Most of us do not usually association the needs of vulnerable and marginalized people with the DOJ. However, the intersection of the two is evident in Project 2025's outline for the DOJ—in particular when we focus on criminal justice and social justice.

The first step the policy blueprint would implement as far as the DOJ is concerned is perhaps the most ominous one. Project 2025 intends for an incoming Trump administration to have increased control of all executive branch functions. This control would be achieved by centralizing management under a "unitary presidency," which gives the executive branch enormous direct influence over the DOJ and other executive offices. With such expanded powers over DOJ, Project 2025 suggests that the following:

- DOJ would actively investigate and potentially prosecute progressive local prosecutors who are perceived as being lenient on crime. The policy blueprint lists progressive-leaning cities as Chicago, Los Angeles, and San Francisco.
- A plan to reduce federal oversight proposes to halt federal civil rights investigations into local police departments, which have historically been used to address systemic abuses.
- In the area of DOJ's Social Justice Oversight, Project 2025 includes measures intended to eliminate initiatives aimed at addressing systemic racism within the justice system.
- The policy plan also advocates for increased policing and incarceration while, at the same time, a reduction of funding for community-based alternatives that reduce crime and enhance public safety.

Impact on Federal Diversity, Equity, and Inclusion Programs

Project 2025 seeks to dismantle all the ways in which diversity, equity, and inclusion have influenced and integrated the federal government. The primary recommendation is to eliminate, equity, and inclusion under the promise to "restore the American family as the centerpiece of American life and protect our children."



The blueprint also recommends the next conservative President delete following terms from use in official federal agency policy and regulatory document.

- sexual orientation and gender identity ("SOGI")
- diversity, equity, and inclusion ("DEI")
- gender, gender equality, gender equity, gender awareness, gender-sensitive
- abortion
- reproductive health
- reproductive rights

Project 25's blueprint, **Mandate for Leadership**, also includes the following:

- Dismantle diversity, equity, and inclusion within government
- Eliminate chief diversity officers; diversity, equity, and inclusion committees; and equity plans
- Establish diversity, equity, and inclusion taskforces to determine the scope, breadth, and depth of diversity, equity, and inclusion initiatives
- Retaliate against professionals who participate in diversity, equity, and inclusion initiatives, and treating participation as grounds for termination
- Make it impossible to prove discrimination by prohibiting the collection of EEO-1 data (e.g., representation data like race/ethnicity)

A close reading of the DE&I section of Project 2025 will affirm the authors' thorough antipathy to the concept of and policies related DE&I. For that reason, it is highly troubling that Project 2025 recommends utterly "gutting" any and all official policies, regulations, and references to DE&I within the federal bureaucracy. Additionally, ending DE&I programs and policies would likely have a significant impact on affirmative action as a major federal commitment to racial equity. Project 2025, not only aims to dismantle DEI initiatives, the blueprint seeks to promote so-called "race-neutral" policies — which the far-right believes make DE&I and affirmative action unnecessary. Critics of this assumption argue that ending DE&I at the federal level could undermine decades of progress in civil rights and diversity within the federal workforce.

Responding to the Project 2025 Threat

While the public announcement of Project 2025 by the Heritage Foundation seemed to catch political and social policy experts by surprise, the reaction to this detailed manifesto was swift. To their credit, the progressive social justice community quickly raised the alarm about the depths of the harmful far right policies that Project 2025 contains. More important, advocates immediately recognized that Project 2025 was not an academic style policy paper, but a true blueprint for completely transforming the federal bureaucracy into an autocratic government apparatus dominated by a president armed with unitary executive powers. Moreover, the authors of Project 2025 are fully confident that a new Trump administration will be prepared to begin implementing the policy plan on day 1—inauguration day, 2025.

Although the progressive community and much of the media recognized the transformative nature of and —to some—the threat to democracy that Project 2025 poses, stopping the project from coming to fruition will not be easy. The truth is, at the time Project 2025

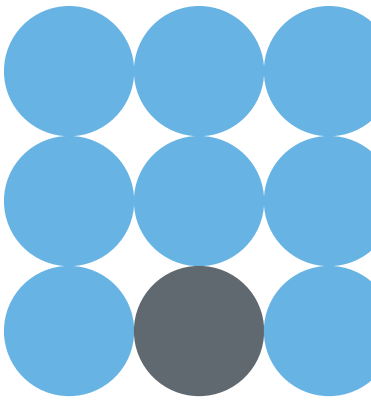
was announced, the 2024 presidential election was less than a year away. This fact makes it clear that the only sure way to stop Project 2025 is by laser-focusing on preventing a far right from gaining the presidency—and Congress—in 2024 (and beyond). However, it does appear that advocacy groups, stakeholder organizations who oppose Project 2025, and political entities quickly recognized that their efforts and resources have to be directed at mobilization for the 2024 election. That mobilization encompassed such actions as; voter education outreach; legal and electoral preparedness related to election integrity; and coalition building.

Conclusion

The emphasis of this analysis is on the consequences of Project 2025's doctrine for vulnerable and marginalized Americans, including members of the middle class who are at risk of economic crisis due to external events. These individuals include close to 100 million people who directly or indirectly receive benefits from the social safety net that Project 2025 seeks to dismantle.

Thus, we should not be misled by "deep state" or "administrative state" rationales that Project 2025's rhetoric uses to justify the massive disruption of the federal bureaucracy it proposes. This is more about far-right ideology that has been around for a long time, a 90-year effort by conservatives to dismantle New Deal programs that helped millions of American survive the Great Depression, thereby, returning the nation to a historic level of economic and social inequality—which would disproportionately affect people of color. Well before Project 2025's positions on social safety net programs were made public, CAP warned that weakening programs such as SNAP, TANF, affordable housing, Medicare, and Medicaid will exacerbate regional and racial income disparities._

NASW and the social work profession—as part of the workforce that serve vulnerable and marginalized people—have a major stake in the struggle against the effort to overhaul federal departments that have successfully managed essential programs and services for people we (social workers) serve.



NASW Resources

NASW » SocialWorkers.org

NASW Foundation » NASWFoundation.org

NASW Press » NASWPress.org

NASW Assurance Services, Inc. » NASWAssurance.org

Find A Social Worker » HelpStartsHere.org

Social Work Blog » SocialWorkBlog.org

NASW Research and Data » SocialWorkers.org/News

Social Work Advocacy » SocialWorkers.org/Advocacy

©2024 National Association of Social Workers. All Rights Reserved.

NASW
National Association of Social Workers

750 First Street NE, Suite 800
Washington, DC 20002-4241
socialworkers.org