

## President Trump's Executive Orders (EOs) and Actions Impacting Higher Education

*Note: This is not an exhaustive list but rather the EOs and executive actions that impact higher education. The list will be updated regularly.*

### EOs and Executive Actions Related to Diversity, Equity, and Inclusion (DEI)

#### **Ending Illegal Discrimination and Restoring Merit-Based Opportunity (01/21/25)**

The EO directs all federal agencies to end DEI preferences, mandates, policies, programs, and activities. It revokes EO 11246, which has required federal contractors to have affirmative action plans since 1965. The EO directs the Attorney General and Secretary of Education to issue guidance to state and local educational agencies and institutions of higher education that receive federal funds or participate in the Title IV federal student loan assistance program on “the measures and practices required to comply with *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College*.” The EO also mandates investigations of institutions with endowments of at least \$1 billion.

#### **Ending Radical and Wasteful Government DEI Programs and Preferencing (01/20/25)**

The Office of Management and Budget (OMB) director, assisted by the attorney general and the Office of Personnel Management (OPM) director, must end all discriminatory programs, including DEI and “diversity, equity, inclusion, and accessibility” (DEIA) mandates, policies, programs, preferences, and activities in the federal government, under whatever name they appear (including in relation to “environmental justice”).

#### **Initial Rescissions of Harmful Executive Orders and Actions (01/20/25)**

This broad EO rescinds 78 EOs from the Biden administration, including those aimed at increasing equity and economic opportunity for underrepresented students, Tribal Colleges and Universities, and Hispanic-Serving Institutions. The EO also pulls back EO 14124 (2024), which established a White House initiative to increase educational access through HSIs. That initiative supported HSIs in building educational capacity, improving student economic mobility, and enhancing federal recruitment efforts on their campuses. *Note: This EO is also referenced below in other categories.*

#### **U.S. Department of Education Letter to Institutions of Higher Education re: DEI and SFFA decision (02/14/25)**

The letter from the Acting Assistant Secretary of the Office of Civil Rights (OCR) to colleges and universities to “clarify and reaffirm nondiscrimination obligations of schools and other entities that receive federal financial assistance from the U.S. Department of Education” (ED). The letter states that the Supreme Court decision regarding *Students for Fair Admission (SFFA)* has clarified that “Federal law thus prohibits covered entities from using race in decisions pertaining to admissions, hiring, promotion, compensation, financial aid, scholarships, prizes, administrative support, discipline, housing, graduation ceremonies, and all other aspects of student, academic, and campus life.” It also encourages the public to file complaints with OCR if they believe a “covered entity” has unlawfully discriminated.

### **Preventing Woke AI in the Federal Government (07/23/25)**

The order mandates agency heads to procure only large language models (LLMs) that adhere to “Unbiased AI Principles” of truth-seeking and ideological neutrality. Truth-seeking means that LLMs must be truthful and prioritize historical accuracy, scientific inquiry, and objectivity and acknowledge uncertainty where reliable information is incomplete or contradictory. Ideological neutrality means that “LLMs shall be neutral, nonpartisan tools that do not manipulate responses in favor of ideological dogmas such as DEI.”

The order instructs the Director of the Office of Management and Budget, in consultation with other federal leaders, to issue guidance for agencies to implement these principles in AI procurement. It mandates that federal contracts for LLMs include terms ensuring compliance with the Unbiased AI Principles, including terms holding vendors accountable for certain costs if contracts are terminated due to noncompliance.

### **Ensuring Transparency in Higher Education Admissions (08/07/25)**

The memorandum directs the Secretary of Education to revamp the Integrated Postsecondary Education Data System (IPEDS) to “provide adequate transparency” into college admissions following the Supreme Court’s ruling on race-based admissions. ED must overhaul the IPEDS portal and data presentation to improve accessibility, and within 120 days expand required reporting on admissions. ED must also increase accuracy checks and take remedial action under Title IV and other applicable laws against institutions that fail to submit complete or timely data.

## **EOs Impacting Higher Education and the U.S. Department of Education**

### **Improving Education Outcomes by Empowering Parents, States, and Communities (03/20/25)**

The order directs the Secretary of Education to take all necessary steps to facilitate the closure of the Department of Education and return authority over education to the states and local communities, while maintaining uninterrupted services, programs, and benefits. It also requires that any remaining federal education funding strictly comply with federal law and administration policy, prohibiting the use of federal assistance for programs that promote “diversity, equity, and inclusion” or similar terms, as well as programs promoting gender ideology.

### **Preparing Americans for High-Paying Skilled Trade Jobs of the Future (04/23/2025)**

The order establishes a policy to optimize and target federal investment in workforce development to align with U.S. re-industrialization needs and the growing demand for skilled trades and other occupations. Within 90 days of the order, the secretaries of Labor, Commerce, and Education must review all current federal workforce programs, identify ways to streamline and improve them, and submit a report to the President’s Domestic Policy Advisor and the Director of the Office of Management and Budget. The report must outline strategies to better align resources with workforce needs and include a plan to exceed 1 million new active apprentices.

### **Transparency Regarding Foreign Influence at American Universities (04/23/2025)**

This order directs the Secretary of Education to enforce Section 117 of the Higher Education Act of 1965, which mandates disclosure of significant foreign gifts and contracts to U.S. higher education institutions. The Secretary must take steps to reverse or rescind prior administration policies enabling “secrecy,” require institutions to disclose detailed information about the sources and purposes of foreign funding and ensure public access to that information. The Secretary and the heads of other appropriate executive departments and agencies must hold institutions accountable through audits, investigations, and enforcement actions.

### **White House Initiative to Promote Excellence and Innovation at Historically Black Colleges and Universities (04/23/2025)**

The order re-establishes the White House Initiative on Historically Black Colleges and Universities (HBCUs)

to strengthen HBCUs' capacity to partner with federal agencies, the President's Board of Advisors on HBCUs (created within the order), educational associations, and private-sector organizations. The Initiative must expand private-sector support for institutional development, infrastructure, and workforce preparation, while enhancing HBCUs' ability to serve students by promoting innovation, fostering partnerships, improving access to funding, and supporting student success. The order also revokes Executive Order 14041 of September 3, 2021, White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity Through Historically Black Colleges and Universities.

#### **Reforming Accreditation to Strengthen Higher Education (04/23/2025)**

The order directs the Secretary of Education, in coordination with the Attorney General, to hold accrediting agencies accountable—through denial, monitoring, suspension, or termination of recognition—if they fail to meet recognition standards or violate federal law, including by requiring institutions to engage in diversity, equity, and inclusion practices. The Secretary and Attorney General will investigate and take action to end unlawful discrimination by higher education institutions, including law and medical schools. This includes discrimination advanced by the American Bar Association's Council of the Section of Legal Education and by medical schools or graduate medical education entities accredited by the Liaison Committee on Medical Education, the Accreditation Council for Graduate Medical Education, or other relevant accreditors. The order also seeks to establish new principles of student-oriented accreditation, aimed at realigning accreditation with high-quality, valuable education for students.

## **EOs on Higher Education and Antisemitism/Title VI**

#### **Additional Measures to Combat Anti-Semitism (01/29/25)**

This EO directs the federal government to combat antisemitism vigorously, “using all available and appropriate legal tools, to prosecute, remove, or otherwise hold to account the perpetrators of unlawful anti-Semitic harassment and violence.” Within 60 days, agency heads must report on civil and criminal actions related to campus antisemitism, including pending complaints and legal cases. The Attorney General is encouraged to pursue civil rights enforcement, and ED must review all Title VI complaints related to antisemitism in K-12 and higher education. Additionally, the secretaries of State, Education, and Homeland Security must develop recommendations for monitoring and reporting alien students and staff who may be inadmissible under U.S. immigration laws. This EO builds on the Trump administration first term, [Executive Order 13899](#), which required federal agencies to use the International Holocaust Remembrance Alliance definition of antisemitism and its examples when enforcing Title VI of the Civil Rights Act.

#### **Justice Department Announces Formation of Task Force to Combat Anti-Semitism**

#### **U.S. Department of Education Probes Cases of Antisemitism at Five Universities**

#### **HHS' Civil Rights Office Acts Swiftly to Combat Anti-Semitism (02/03/25)**

Following the January 29 EO, the Department of Justice announced the formation of a new multiagency taskforce “to root out anti-Semitic harassment in schools and on college campuses.” In addition, ED announced on the same day it was launching five investigations at institutions of higher education “where widespread antisemitic harassment has been reported” and the Department of Health and Human Services (HHS) would investigate four medical schools over “protests taking place during their 2024 commencement ceremonies.”

#### **Restoring Equality of Opportunity and Meritocracy (04/23/2025)**

The order seeks to eliminate the use of disparate-impact liability. It revokes prior presidential actions including: Department of Justice Title VI regulations (31 *Fed. Reg.* 10269), as applied to 28 C.F.R. 42.104(b)(2) in full; and Department of Justice Title VI regulations (38 *Fed. Reg.* 17955, FR Doc. 73-13407),

as applied to the words “or effect” in both places they appear in 28 C.F.R. 42.104(b)(3), and as applied to 28 C.F.R. 42.104(b)(6)(ii) and 28 C.F.R. 42.104(c)(2) in full. The order also directs federal agencies to deprioritize enforcement of all statutes and regulations to the extent they include disparate-impact liability and instructs the Attorney General and the Chair of the Equal Employment Opportunity Commission to assess all pending investigations, civil suits, or positions taken in ongoing matters that rely on disparate-impact liability theory. Agencies responsible for enforcement of the Equal Credit Opportunity Act must evaluate such proceedings within 45 days, and all agencies must evaluate existing consent judgments and permanent injunctions relying on the theory within 90 days.

## EOs Impacting Higher Education and Immigration

### **Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats (01/20/25)**

This EO authorizes increased vetting and screening of individuals seeking admission and already present in the United States. The EO also directs agencies to enhance vetting for those coming from countries with identified security risks, as well as, identifying admitted aliens and aliens otherwise already present in the United States “do not bear hostile attitudes toward its citizens, culture, government, institutions, or founding principles, and do not advocate for, aid, or support designated foreign terrorists and other threats to our national security.”

### **America First Policy Directive to the Secretary of State (01/20/25)**

This EO directs the Secretary of State to “issue guidance bringing the Department of State’s policies, programs, personnel, and operations in line with an America First foreign policy, which puts America and its interests first.” It could impact programs that are funded by the State Department.

### **Protecting the American People Against Invasion (01/20/25)**

This EO directs executive departments and agencies to enforce final deportation orders and directs the Secretary of Homeland Security to ensure the efficient and expedited removal of individuals who have not been admitted or paroled into the United States and do not qualify for asylum. The EO establishes Federal Homeland Security Task Forces, limits sanctuary jurisdictions' funding, and restricts public benefits for undocumented individuals.

Following this EO, on February 25, the [Trump administration announced](#) that it will enforce a provision of the [Immigration and Nationality Act](#) that requires all undocumented immigrants age 14 or [to register and be fingerprinted](#) with USCIS. Failure to comply will result in criminal and civil penalties. According to [DHS Secretary Kristi Noem](#), enforcing this requirement is part of a broader effort to “compel illegal aliens to self-deport.”

### **Ending Taxpayer Subsidization of Open Borders (02/19/25)**

This EO directs federal departments and agencies to identify all federally funded programs that currently “permit illegal aliens to obtain any cash or non-cash public benefit” and improve eligibility verification systems to prevent benefits from going to individuals unlawfully present in the United States. The order mandates federal funds to states and localities not be used to support “sanctuary” policies to shield illegal aliens from deportation. Within 30 days of the date of this order, the director of OMB and administrator of DOGE, in coordination with the assistant to the president for domestic policy, will identify sources of federal funding for illegal alien and recommend additional agency actions to align federal spending with the purposes of this order and enhance eligibility verification systems.

### **Protecting American Communities From Criminal Aliens (04/28/25)**

The order directs the Attorney General, in coordination with the Secretary of Homeland Security, to publish

a list of States and local jurisdictions that obstruct the enforcement of federal immigration law within 30 days. Immediately following each publication, the Attorney General and the Secretary of Homeland Security must notify each sanctuary jurisdiction regarding its defiance of Federal immigration law enforcement and any potential violations of Federal criminal law. They will then pursue all necessary legal remedies and enforcement measures to end these violations. The Attorney General and the Secretary of Homeland Security will also take action to halt state or local laws that favor undocumented individuals including State laws that provide in-State higher education tuition to aliens but not to out-of-State American citizens or that favor aliens in criminal charges or sentencing.

#### **Restricting the Entry of Foreign Nationals to Protect the United States from Foreign Terrorists and Other National Security and Public Safety Threats (06/04/25)**

This order fully restricts and limits the entry of nationals of the following 12 countries including Afghanistan, Burma, Chad, Republic of the Congo, Equatorial Guinea, Eritrea, Haiti, Iran, Libya, Somalia, Sudan, and Yemen. These restrictions distinguish between, but apply to both, the entry of immigrants and nonimmigrants. The order also partially restricts and limits the entry of nationals of Burundi, Cuba, Laos, Sierra Leone, Togo, Turkmenistan, and Venezuela. The entry into the United States of nationals of the following countries is suspended and limited, as follows, subject to the categorical exceptions and case-by-case waivers.

Within 90 days of the date of this proclamation, and every 180 days thereafter, the Secretary of State, in consultation with the Attorney General, the Secretary of Homeland Security, and the Director of National Intelligence, must submit a report to the President describing his assessment and recommending whether any suspensions and limitations imposed in this order should be continued, terminated, modified, or supplemented.

#### **Enhancing National Security by Addressing Risks at Harvard University (06/04/25)**

This order suspends and limits the entry of any alien into the United States as a nonimmigrant to pursue a course of study, or to participate in an exchange visitor program hosted by Harvard University. That suspension and limitation shall expire, absent extension, 6 months after today's date. The order applies to aliens who enter or attempt to enter the United States to begin attending Harvard University through the Student Exchange Visa Program (SEVP).

The Secretary of State must determine whether foreign nationals who currently attend Harvard University and are in the United States pursuant to F, M or J visas should have their visas revoked. The Secretary of State, the Attorney General, and the Secretary of Homeland Security must also consider using their respective authorities under the INA to impose limitations on Harvard University's ability to participate in the SEVP and the Student and Exchange Visitor Information System. On June 5, Harvard [sued to stop](#) this EO and was granted a temporary injunction that blocked the administration from implementing this EO.

#### **Restriction on Entry of Certain Nonimmigrant Workers (09/19/25)**

This proclamation restricts the entry of H-1B nonimmigrant workers unless their petition is accompanied by a \$100,000 payment from the sponsoring employer. Previously, H-1B visas typically cost at most \$5,000. The 12-month restriction, which took effect September 21, 2025, and can be extended, applies to individuals outside the United States seeking to enter on new H-1B petitions. The Secretary of Homeland Security may grant exemptions if hiring is deemed in the national interest. The Departments of State and Homeland Security are directed to enforce compliance and deny visas without proof of payment. The proclamation also requires rulemaking to revise prevailing wage levels and prioritize admission of high-skilled, high-paid workers.

## EOs Impacting Title IX

### Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government (01/20/25)

This EO recognizes two sexes, male and female, and directs agencies to use "sex" instead of "gender" in federal policies and documents. The order also directs the U.S. Education Department to rescind several pieces of guidance, including a 2021 memo that said discriminating against gay or transgender individuals would violate Title IX, which bars sex discrimination in federally funded education programs.

### Keep Men Out of Women's Sports (02/05/25)

This EO mandates federally funded educational institutions to comply with Title IX of the Education Amendments Act of 1972 by prohibiting male participation in women's sports. The order directs the Secretary of Education and the Attorney General to enforce policies that preserve all-female sports and locker rooms, rescind funding from non-compliant programs, and prioritize legal actions against institutions allowing male participation in women's categories. It also rescinds U.S. participation in people-to-people sports exchanges or other sports programs that classify female sports based on identity rather than biological sex. Additionally, it promotes international policies to protect sex-based sports categories, restricts U.S. entry for male athletes attempting to compete in women's sports, and urges the International Olympic Committee to ensure eligibility for women's sports is based solely on biological sex.

### Saving College Sports (07/24/25)

The order aims to preserve scholarship opportunities and roster spots in women's and non-revenue sports across collegiate athletic programs. It outlines different expectations based on athletic department revenue levels during the 2024–25 season:

- **Departments with over \$125 million in revenue** should *increase* scholarship opportunities in non-revenue sports compared to 2024–25 and must offer the *maximum* number of roster spots permitted under applicable collegiate athletic rules.
- **Departments with over \$50 million in revenue** should provide *at least as many* scholarship opportunities as in 2024–25 and likewise offer the maximum number of roster spots in non-revenue sports.
- **Departments with \$50 million or less in revenue, or with no revenue-generating sports**, should *not disproportionately reduce* scholarship opportunities or roster spots based on a sport's revenue-generating status.

The Secretary of Education is tasked with developing a plan to implement policies that preserve and expand women's and non-revenue sports and prohibit third-party pay-for-play payments. Within 60 days, the attorney general and the chairman of the Federal Trade Commission must review and revise litigation strategies and develop a plan to implement future legal protections for college athletics.

## EOs Impacting Sustainability

### Initial Rescissions of Harmful Executive Orders and Actions (01/20/25)

This EO revokes the following Biden-era EOs related to higher education's effort to combat climate change. The order ceases the White House Office of Domestic Climate Policy within the Executive Office of the President. It would also end the Justice40 Initiatives and other HBCU- and MSI-related environmental justice programs.



### **Protecting American Energy from State Overreach (04/08/25)**

This EO directs the Attorney General, in consultation with the heads of appropriate executive departments and agencies, to identify and act against state and local laws that burden domestic energy production and may be unconstitutional, preempted by federal law, or otherwise unlawful, particularly those tied to climate change, environmental justice, greenhouse gas emissions, and carbon penalties. The attorney general must “expeditiously take all appropriate action to stop the enforcement of State laws that the Attorney General determines to be illegal.” A report from the attorney general on recommended executive and legislative actions is due in 60 days.

## **EOs and Executive Actions Impacting University Endowments**

### **America First Investment Policy (02/21/2025)**

The memorandum instructs the federal government to use all necessary legal instruments, including the Committee on Foreign Investment in the United States (CFIUS), to restrict People’s Republic of China-affiliated investments in critical sectors such as technology, critical infrastructure, healthcare, agriculture, energy, raw materials, or other strategic sectors. It directs agencies to establish a fast-track process for investments from allied partners while ensuring these investors do not collaborate with foreign adversaries in corresponding areas. Investments exceeding \$1 billion will undergo expedited environmental reviews, and mitigation agreements must include concrete, time-bound actions. Restrictions on foreign investors’ access to U.S. assets will be eased based on their independence from PRC-aligned predatory investment practices, while passive investments without governance influence will still be encouraged.

The administration will consider new or expanded restrictions on outbound U.S. investments in critical sectors such as semiconductors, artificial intelligence, quantum computing, biotechnology, aerospace, and advanced manufacturing. The review will also consider restrictions on investment types—including private equity, venture capital, corporate expansions, and public securities—funded by pension funds, university endowments, and other limited-partner investors, to prevent U.S. financial resources from supporting China’s Military-Civil Fusion strategy. The memorandum specifically states that “it is past time for American universities to stop supporting foreign adversaries” and “stop granting university access to supporters of terrorism.”

## **EOs Impacting Student Loan Forgiveness**

### **Restoring Public Service Loan Forgiveness (03/07/2025)**

This EO directs the Secretary of Education, in coordination with the Secretary of the Treasury as appropriate, to revise the Public Service Loan Forgiveness (PSLF) program to prevent eligibility for organizations engaged in illegal activities from qualifying for loan forgiveness. Specifically, it would prohibit PSLF funds from subsidizing through loan forgiveness activities that advance illegal immigration, terrorism, child abuse, discrimination, and public disruptions. The [White House fact sheet](#) claims to refocus PSLF on “encouraging Americans to enter essential public service roles, such as nursing, rather than activist groups.”

## **EOs and Executive Actions Impacting Government Operations**

### **Reevaluating and Realigning United States Foreign Aid (01/20/25)**

This EO orders a 90-day pause on all U.S. foreign development assistance, in order to perform an “assessment of programmatic efficiencies and constituency with U.S. foreign policy.” Within 90 days, the heads of the agencies, along with the OMB Director, will determine whether or not these programs will

continue. This EO led to the initial stop-work orders at USAID, the restructuring of the agency, and efforts to embed a greatly reduced foreign development assistance program into the U.S. Department of State.

#### **Office of Management and Budget Memo on “Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs” (01/29/25)**

This memo to the heads of federal agencies, instructs those agencies to pause all and review all external funding and programs to ensure they are “consistent with the President’s policies and requirements” including the EOs issued on DEI, gender, sustainability and foreign policy. This memo was rescinded the same day after a court ruling blocked its implementation. Additional court orders have been issued as the administration has continued to stop, delay, or pull-down programs not aligned with the executive orders.

#### **Unleashing Prosperity Through Deregulation (01/31/25)**

This EO mandates that for each new federal regulation issued, at least 10 prior regulations be identified for elimination. The heads of all agencies are directed to ensure that the total incremental cost of all new regulations, including repealed regulations being finalized in the fiscal year 2025, shall be significantly less than zero. The order also rescinds the Biden administration’s update to the document known as OMB Circular A-4, which provides guidance to all executive branch agencies about how to assess the desirability of proposed regulations, particularly in how to measure costs and benefits.

#### **Supplemental Guidance to the 2024 NIH Grants Policy Statement: Indirect Cost Rates (02/07/25)**

The National Institutes of Health (NIH) issued an update to grant policy imposing an across-the-board 15 percent cap on indirect costs for NIH funded research. This went against previously negotiated rates at institutions of higher education, where the rates were often over 50 percent. This action was quickly challenged in the courts, including in a suit brought against the action by ACE along with AAU and APLU. As of February 10<sup>th</sup>, the courts issued a Temporary Restraining Order (TRO) against this cap on indirect costs.

#### **Implementing the President’s “Department of Government Efficiency” Workforce Optimization Initiative (02/11/25)**

This EO mandates the OMB director to submit a plan in reducing federal workforce, requiring agencies to hire only one employee for every four departures. Agency heads must follow the federal hiring plan outlined in the EO on [Reforming the Federal Hiring Process and Restoring Merit to Government Service](#). Agency heads must develop a data-driven plan on new highest-need appointment hires and consult with the Department of Government Efficiency (DOGE) to implement reductions-in-force targeting non-essential functions and DEI programs. The OPM will initiate a rulemaking process within 30 days to revise federal hiring suitability criteria and agency heads must submit reorganization plans to OMB. The DOGE Service administrator must submit a report within 240 days to the president on the implementation of this order.

Following this order, a [February 26 memo](#) from OMB and OPM instructed all federal agencies to begin preparations for large-scale layoffs and restructuring. Law enforcement, border security, national security, immigration enforcement, public safety, military personnel, and uniformed officers, including the U.S. Coast Guard, Public Health Service, and NOAA officers are exempted. Agencies providing direct citizen services, including Social Security, Medicare, and veterans' health care, must obtain OMB or OPM approval before restructuring.

#### **Keeping Education Accessible and Ending COVID-19 Vaccine Mandates in Schools (02/15/25)**

This EO states that discretionary federal funds (such as grants) cannot be used to directly or indirectly support or subsidize “an educational service agency, State educational agency, local educational agency, elementary school, secondary school, or institution of higher education that requires students to have received a COVID-19 vaccination to attend any in-person education program.”



### **Radical Transparency about Wasteful Spending (02/18/25)**

This memorandum directs the heads of executive departments and agencies to disclose all details of every terminated program, cancelled contract, terminated grant, and any other discontinued obligation of Federal funds “to the maximum extent permitted by law.”

### **Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative (02/19/2025)**

This order directs agency heads, in coordination with their DOGE team lead and the OMB director, to review and rescind all agency regulations that are deemed unconstitutional, unlawful, lack clear statutory authority, impose excessive costs, or hinder economic and technological development. Within 60 days, agency heads must provide the administrator of OMB’s Office of Information and Regulatory Affairs (OIRA) a list of all regulations identified for modification or rescission. OIRA will consult with agency heads to develop a unified regulatory agenda to rescind or modify identified rules. For new regulations, agency heads must adhere to the procedures outlined in EO 12866 and consult with their DOGE team leads and the OIRA administrators to ensure alignment with the principles of this order.

### **Implementing the President’s “Department of Government Efficiency” Cost Efficiency Initiatives (02/26/25)**

This EO directs agencies, with the assistance of their DOGE team lead, to establish centralized systems to track payments issued by the agency under each of its covered contracts and grants. Once the system is in place, agencies must issue guidance to require written justifications prior to the employee’s approval of a payment under covered contracts and grants. Within 30 days, agency heads must review existing covered contracts and grants to identify those that can be terminated or modified to reduce or reallocate federal spending and pause review payouts that have not had written justifications submitted.

In follow up from this EO, the HHS Payment Management System [introduced](#) a new mandatory field in the payment request screen to capture a justification from the grant recipient explaining the purpose of each draw down.

### **Continuing the Reduction of the Federal Bureaucracy (03/14/25)**

The order directs the continuation of reductions “in the element of the Federal bureaucracy that the President has determined are unnecessary.” The reductions include the Federal Mediation and Conciliation Service, the United States Agency for Global Media, the Woodrow Wilson International Center for Scholars in the Smithsonian Institution, the Institute of Museum and Library Services, the United States Interagency Council on Homelessness, the Community Development Financial Institutions Fund, and the Minority Business Development Agency.

### **Adjusting Department of Energy Grant Policy for Institutions of Higher Education (IHE) (04/11/25)**

In a memorandum, the Department of Energy (DOE) announced that they will limit financial support of “indirect costs” of DOE research funding to 15 percent. Consistent with this memo, “the Department is undertaking action to terminate all grant awards to IHEs that do not conform with this updated policy.” On April 14, a suit was filed by ACE, AAU, and APLU, along with a group of institutions and a TRO was issued.

### **NSF Policy Notice: Implementation of Standard 15 percent Indirect Cost Rate (05/02/25)**

apply a standard indirect cost rate not to exceed 15% to all grants and cooperative agreements awarded to IHEs for which indirect costs are allowable.” This policy would only apply to new awards made to Institutions of Higher Education made on or after May 5, 2025. On May 5, ACE, AAU, and APLU [filed a suit](#) regarding this action. .

### **Improving the Safety and Security of Biological Research (05/05/25)**

The order requires the White House Office of Science and Technology Policy (OSTP), in coordination with

key federal officials and agencies, to establish guidance on ending federal funding of “gain-of-function” research and Federal funding of other life-science research conducted by foreign entities in countries of concern where there is not adequate oversight. The Director of OSTP must revise or replace the 2024 “United States Government Policy for Oversight of Dual Use Research of Concern and Pathogens with Enhanced Pandemic Potential” and the 2024 “Framework for Nucleic Acid Synthesis Screening.” Gain of function research, or “dual-use research”, relates to research and experiments on viruses and other pathogens that could be highly transmissible. Within 180 days of the order, the Director of OSTP must develop and implement a strategy to govern and track non-federally funded gain-of-function research across the U.S. Violations against these restrictions may lead to institutional penalties, including immediate loss of funding and up to five years of ineligibility for federal grants.

#### **Restoring Gold Standard Science (05/23/25)**

The order directs the Director of the Office of Science and Technology Policy to issue guidance within 30 days for federal agencies on the implementation of “Gold Standard Science” in the conduct and management of their science activities. Agency heads and employees must follow the rules governing the use, interpretation, and communication of scientific data, including mandates for transparency, disclosure of influential models and data (with limited exceptions), acknowledgment of uncertainty, avoidance of scientific misconduct, and reliance on a “weight of scientific evidence” approach in decision-making. Agencies must review all regulations and actions issued from 2021 to 2025 “to ensure alignment with the policies and requirements of this order.” Each agency head is also required to establish internal processes to evaluate alleged violations of the requirements of this order and other applicable agency policies governing the generation, use, interpretation, and communication of scientific information.

#### **Eliminating Waste, Fraud, and Abuse in Medicaid (06/06/25)**

The order directs the Secretary of Health and Human Services to take appropriate action to eliminate waste, fraud, and abuse in Medicaid, including by ensuring Medicaid payments rates are not higher than Medicare, to the extent permitted by applicable law.

#### **Winning the Race: America’s AI Action Plan (07/23/25)**

On July 23, 2025, the White House unveiled *Winning the Race: America’s AI Action Plan*. The plan was released in accordance with President Donald Trump’s Jan. 23, 2025, executive order on [Removing Barriers to American Leadership in Artificial Intelligence](#).

The AI Action Plan identifies over 90 federal policy actions across three pillars, including accelerating innovation, building American AI infrastructure, and leading in international diplomacy and security, that the administration will begin implementing in the coming weeks and months. The plan outlines policies aimed at supporting U.S. leadership in artificial intelligence by facilitating the export of complete AI systems to allied nations, streamlining permits for data centers and semiconductor facilities, reviewing and potentially removing federal regulations that may hinder AI development, and updating procurement guidelines to prioritize objectivity in government-contracted AI models. ACE and the higher education community [submitted comments](#) on the proposed AI action plan earlier this year.

#### **Improving Oversight of Federal Grantmaking (08/07/25)**

In order to “to improve the process of Federal grantmaking while ending offensive waste of tax dollars,” this order directs federal agencies to strengthen oversight of discretionary grants to ensure they align with agency priorities and the “national interest.” Agency heads must designate a senior appointee “responsible for creating a process to review new funding opportunity announcements and to review discretionary grants to ensure that they are consistent with agency priorities and the national interest.” Agencies are also required to streamline application requirements and give preference to institutions with lower indirect cost

rates and commitments to “Gold Standard Science.” The order prohibits funding for projects that promote racial preferences, reject “the sex binary,” support illegal immigration, or “compromise public safety or promote anti-American values.” It also requires clear benchmarks for success, limits facilities and administrative cost allowances, and mandates grant terms “permit termination for convenience” if awards no longer advance agency priorities.

