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Author: Anne-christine d'Adesky
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What Does Project 2025 Mean for Federal Workers and Labor?

What are its possible impacts on our economy?

Project 2025 has many radical objectives, but a core and consistent one is the dismantling of the “Administrative State” and the complete restructuring of the federal workforce, and in some cases, the government itself. Across the government, the proposals it puts forward would have a devastating impact on the federal labor force and the structure and functioning of each department. Media articles have detailed major job losses that would follow, but they have not captured anything close to the true scope or repercussions of this plan.

Given that Project 2025 targets all sectors of the government, it also stands to radically impact the American economy, as well as the global economy, US foreign policy, and foreign aid.

Already, many GOP leaders have taken up many of its proposals, and support resurrecting **Schedule F**, an Executive Order that would allow mass layoffs of apolitical federal workers, to be replaced by conservative loyalists (see below). Schedule F was created and briefly implemented as a new category of federal positions in 2020 for certain policy roles.

Now Trump, as well as Florida Governor Ron DeSantis and Vivek Ramaswamy, among top GOP leaders, all back Schedule F or analogous plans to mass fire government workers and remake the workforce with GOP loyalists.ⁱ The goal is to “regain control,” states former Trump official Paul Dans. “We need to flood the zone with conservatives.”ⁱⁱⁱ Dans is heading Project 2025’s recruitment of a “government-in-waiting” ready to go on “Day One” of a new GOP presidency.

The Heritage Foundation and other Project 2025 advisors are also speaking out publicly via right-wing and mainstream media to promote Schedule F and its anti-labor agenda. They are also pushing back hard against Biden administration efforts to protect the federal workforce against Schedule F and other future attacks detailed in Project 2025. (See box, *Weaponizing Schedule F*)

*“The President Day One will be a wrecking ball for the administrative state,”
declared Russ Vought, a former Trump official and Project 2025 author.*

US economists and business leaders are weighing in, some warning about the myriad dangers that could result from replacing experienced professionals with partisan appointees with limited experience. In a recent speech to seafood industry professionals, Mark Blyth, a Professor of International Economics at Brown University’s Watson Institute for International and Public Affairs, pointed out the threat to consumers and food safety if federal agencies lose the skilled workforce required to adequately staff food safety agencies or critical programs.



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“Very few superpowers advanced their own interest by hollowing out their own state capacities, which is essentially what we're setting out to do,” stated Blyth. “For better or worse, that's what it's going to be,” he said, adding darkly, “I like to know when I'm drinking arsenic.” His concerns about the weakening of agencies and the danger this poses to American consumers apply to all federal departments and have global repercussions.

It's beyond our scope here to provide a systematic economic analysis of Project 2025's possible impact on each federal department or major sector, though such expert analyses are urgently needed. But below we provide a **summary overview** and **discussion** of Project 2025's potential impact on the federal workforce and labor unions, and early efforts to mitigate its many threats.

**The 3 pillars of Project 2025's strategy:
Executive power, Schedule F, and “acting” positions**

Three **key strategies** will greatly determine Project 2025's implementation and possible impact:

The first is changing rules to *provide the next GOP president with unprecedented powers* to carry out reforms or orders, while limiting the oversight power of the Congress or judiciary.

The second pillar calls for *enacting Schedule F (via Executive Order) to reassign – and then remove – 50,000 federal employees now in the “competitive” or merit-based service*, reclassifying them as “at will” political appointees, which are provisional positions and lack the same civil service protections. Appointees can then be easily fired, with limited means of appealing such decisions. In February, unions warned that “tens of thousands” of apolitical professionals could be targeted, based on new revelations. (See box, *Weaponizing Schedule F*)

The third is to *immediately place 20,000 recruited Christian loyalists and political operatives into “acting” or temporary positions across the federal government, armed with a ‘180-day playbook’* and given unprecedented *decision-making* authority to rewrite policy. This strategy is designed to evade Senate oversight or opposition to the president's agenda. This transitional corps would race to implement priority reforms before Congress could stop them. (See below)

Doing so would represent “a massive degree of politicization” and “the most fundamental change to the civil service system since 1883,” states a Brookings Institute analysis of the proposed weaponization of Schedule F.ⁱⁱⁱ Ironically, while Project 2025 conservatives say they back a smaller government, their plan would hire many new people to fill its ranks.

As of January 2024, 7,500 people had reportedly submitted their resumes to the Heritage Foundation for consideration as candidates for future office committed to Project 2025's agenda.



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Pillar One: A Supreme Executive

Project 2025 has been called a blueprint for autocracy because, among its radical proposals, it promotes the doctrine of ‘*executive unitary theory*.’ It seeks to give the Executive Branch unprecedented power and to restructure lines of authority to consolidate the president’s power, stripping or limiting the ability of Congress and the courts to block the president’s decisions. One tool to do this is via executive action. Project 2025 has reportedly already drafted a slew of “Day One” Executive Orders for the next GOP president to sign and put this plan in motion.

Pillar Two: Tens of Thousands of Jobs Could Be at Stake.

Project 2025 calls for resurrecting the briefly-implemented Executive Order 13957, known as **Schedule F**, to recategorize 50,000 apolitical career professionals to become provisional “at will” political appointees who lack the same employment protections. Overnight, they could be let go, unless they agree to carry out the orders of the president or his loyalists, even if illegal. Schedule F permits few, if any, remedies or defenses against threats and intimidation of employees. Instead, it dissolves their practical capability and duty to enforce the law because the **Prohibited Personnel Practices**^{iv} that govern illegal conduct would be suspended.^v

Project 2025 also provides a path for hiring unaccountable deep state operatives and bribing employees with monetary rewards and promotions because the **Merit System Principles**, that protect honesty within the Executive Branch would be entirely dismissed, say union leaders.^{vi}

Schedule F would reassign 50,000 apolitical career professionals, but federal union officials warn ‘tens of thousands’ could lose their jobs

The threat is hardly abstract and it may be far worse than what is already spelled out in Project 2025. Recently, it was revealed that Trump officials at the Office of Management and Budget in 2020 sought to apply Schedule F to many, many more lower- and mid-level federal positions, not just high-ranking policy or intelligence jobs. This information comes courtesy of a Freedom of Information Act request by the National Treasury Employees Union of Trump OMB records for 2020 and 2021. Union officials warn that “hundreds of thousands” of federal jobs could be targeted by Project 2025. The NTEU is among federal unions leading the call for urgent legislative action to prevent Project 2025 from being implemented and other actions to strengthen job protections for federal employees. (See box, *How Do We Fight Schedule F?*)

Pillar Three: ‘Acting as if’ You Have Legal Authority

Historically, political appointees are allowed into senior government positions to serve in policy advisory and administrative capacities, or example, to assist cabinet secretaries and other top leaders with the implementation of presidential administration-specific goals and initiatives. A new president is responsible for filling 1200 Executive Branch positions.^{vii} Presidential administrations have some flexibility with which to guide certain elements of an agency’s mission. *However, under current law, no presidential administration may augment an agency’s*



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official mission, nor legally can they act against, or conduct business outside of, the laws passed under congressional authorizations of policy or appropriations of funding (emphasis added).^{viii}

Project 2025’s plan to put appointees in temporary, critical **“acting” positions** has legal precedent, albeit not at the scale proposed by Project 2025. The Federal Vacancies Reform Act of 1998 applies to presidentially appointed, Senate-confirmed, positions known as PAS positions that are in Executive Branch agencies, including Executive Branch departments, government corporations, independent establishments, and the Executive Office of the President.^{ix}

The Act established the requirements for temporarily filling PAS positions, how long people may serve, and what happens if the post is vacant. In such cases, the President can direct a Senate-vetted, presidentially-appointed officer to fill it, or a senior agency employee meeting certain criterion. In other cases, various regulations, agency orders, agency directives, or position descriptions can be used to fill a vacancy. That’s the greyish area where Project 2025 aims its sights: first the President will issue a Schedule F to reclassify, then fire, apolitical employees on “Day One,” creating vacancies; then his cronies will install their own people as “acting officers.”

The Legal Strike Force How likely are they to succeed? Opinion is divided, including among legal analysts. But Project 2025’s architects clearly anticipate the push-back, fully aware that they will be test-implementing policies and arguments that breach current law. They intend to recruit legal operatives to replace 5,000 government attorneys in key jobs, and beef up both the authority of the Office of General Counsel and the legal staff in key departments to fight for their agenda from the inside. In other words, *they want the government itself to defend corruption and political overreach against anticipated challenges from Congress and the courts.*

Why 180 days? OMB data show that it takes 100-plus days on average for Senate approval of political nominees that require vetting during presidential transitions. Because of a loophole in the law, some temps or “actings” may also refuse to leave. That was seen in Trump’s presidency, when some of his political nominees resisted leaving, in open defiance of Congressional mandates and law. Trump administration attorneys used the courts to drag out final decisions to remove illegal appointees, buying enough time to keep acting appointees in office for months. *It’s all part of the strategy.* Paul Dans, a former Trump Office of Personnel Management official leading the Heritage Fund’s recruitment effort for Project 2025, thinks that recruited loyalists could even stay longer -- up to a year maybe -- with plenty of time to do plenty of damage.

How Do We Fight Schedule F and These Threats to Labor?

Several actions, including a congressional bill and a new OPM rule, have been put forward to prevent the resurrection of Schedule F and the threat of politicization of the federal workforce. President Biden has gone public to warn about the threat of Schedule F. See our related article, ***How Do We Fight Schedule F and These Threats to Labor?*** for more details and discussion of these efforts and **a list of actions** you can take. And watch for updates on our website.



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What Schedule F Would Mean if Fully Enacted

- It fully politicizes the Executive Branch, offering any president and their unelected political appointees, absolute control of Executive Branch functions, including the military, with little regard for law, regulation, ethics, congressional or judicial oversight.
- It eliminates the Prohibited Personnel Practices that control illegal conduct, and the Merit System Principles that govern honesty, effectiveness, and efficiency within government.
- It forces the removal of apolitical Professional Civil Service employees into a new employment status as political appointees without civil service protections that are essential to enforcing laws, regulations, and ethical behavior.
- It rolls back 250 years of hard-learned lessons on preventing corruption and outsized power to the Executive Branch (i.e., the Spoils system) and significantly reduces transparency and accountability in government.
- It allows the unregulated hiring of political operatives, including private sector hires, into the Executive Branch and allows them to remain in government indefinitely (unlike Schedule C political appointments that change with presidential transitions).
- It allows unchecked remuneration via cash awards, salary increases, promotions, and other forms of compensation for political acts and other acts of personal, unethical, or criminal service.
- It forces tens of thousands of federal employees into a vulnerable employment state, including scientists, attorneys, regulators, medical and public health experts, procurement officers, senior law enforcement officials, military, and intelligence advisors.
- If applied more broadly, it will impact anyone viewed as interacting with federal policy which, by its very nature, applies to *all* federal employees.
- It sells the Executive Branch to the highest bidder through appointees who augment policy and control enforcement of policies on behalf of any private entity with access to that appointee.
- *This list was developed in collaboration with the National Federation of Federal Employees.*

Deregulating and Privatizing Government

Project 2025 not only aims to shrink, weaken, and politicize the federal government, but also to privatize it. It seeks to eliminate or weaken the regulatory oversight authority of federal agencies and boost corporate power, while removing hurdles to corporate profits. It calls for inviting private groups and parallel, or shadow, advisor bodies, with a direct line to the presidency, to help enact Project 2025's ideological goals.



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They include private conservative legal firms and lawyers who would directly represent the government in cases, and – also unprecedented – have a more direct line to the Attorney General, the Cabinet, and the President, bypassing the usual chain of command and protocols that govern transparency and accountability. That represents a complete breach of our current system, as it would allow unelected individuals and undisclosed groups to shape and implement federal policy, and decide how to spend federal taxpayer money.

Meanwhile, the blueprint also calls for giving more unchecked power to state governments, while decreasing federal oversight. It also calls for private sector advisors to work with state and local governments through secret advisory groups to help implement presidential initiatives. All these proposals will have big impacts on the local governments, civil society, unions and the workforce, the economy, and the right of democratic self-governance.

Independent Contractors and Outsourcing

Project 2025 also calls for increasing the hiring of independent contractors and consultants who have fewer job protections than federal employees, and who do not have the duty to report and act upon corruption, fraud, waste, and abuse. Project 2025 clearly states that government contracts will only go to loyal companies and entities that support the political agenda of Project 2025. Federal contractors already account for more than six million private employees doing work with the government. The federal workforce is only two million strong, the same size as it was in the 1950s. Fewer federal employees mean less oversight of federal contractors and work. Here, too, the push is to hire loyalists to funnel money into private hands and away from taxpayers. (*See discussion of unions, below*)

The Anti-Labor Agenda

As a major policy vision document, Project 2025 puts forth myriad proposals that spell an overall ideological opposition to organized labor and to union protections for employees. For starters, it proposes *to entirely eliminate federal and public sector unions*. Many proposals are found in a 37-page chapter on the Department of Labor (DOL) (*see box on DOL reforms, below*). It was written by former Trump official Jonathan Berry, who led the Labor Department's regulatory office under Trump. While there, he famously worked to deny overtime pay for millions of workers and sided with McDonald's corporate management against workers in cases involving complaints against McDonald's franchise store owners.^x

In Project 2025, Berry proposes several initiatives designed to weaken union organizing, while pushing private, company-led schemes, that offer fewer protections for workers. For labor unions in general, it means reversing progress made on civil rights, discrimination, equity, and inclusion. It means dismantling the Equal Employment Opportunity Commission and disabling the National Labor Relations Board. It means the suspension of employment statutes, working



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conditions and pay regulations, expanding child labor, and increasing bogus investigations of unions and unnecessary administrative burdens put upon them.

For federal employee unions, it means championing independent contractors and outsourcing (See box, *Weaponizing Schedule F*). Other radical proposals are scattered in a chapter on the OMB, a critical agency for this GOP administrative coup plan. These include a downward spiral for civil service laws and regulations, eliminating annual increases to pay and ending locality pay, eliminating within grade pay increases, eliminating the EEOC, the Federal Labor Relations Authority, and the Office of Special Counsel, and infiltrating the authority of the US Merit Systems Protection Board. It also calls for developing a market-based system of pay and cutting leave and benefits, another step deemed “shady” by NFFE officials.^{xi}

Looking at the big picture, it’s important to underscore that Project 2025’s authors are former Trump officials who often led the federal departments they seek to radically restructure. They know the system. They are determined to implement their radical makeover under a cover of Executive authority within a 180-day period because they know Congress and the courts will take time to act. They know the penalties for breaking existing laws are mostly administrative burdens versus criminal or significant civil liabilities. That has emboldened them to go rogue.

Key proposed DOL reforms at-a-glance:

- ✓ Labor regulations would only recognize Christian families and traditional values.
- ✓ Reforms promote management over workers’ rights and weaken labor organizing.
- ✓ Reforms aim to weaken National Labor Relations Act protections for workers.
 - ✓ Protections for LGBTQ+ employees would be eliminated.
 - ✓ The impact of race could no longer be considered in discrimination cases.
- ✓ Regulations to protect the environment, health, and safety would be reversed.

The Impact of Theocracy on Labor

Project 2025 also reflects a **template for future theocracy**. The blueprint represents an all-out culture war attack on “wokeness,” seeking to remove so-called “woke” policies in the federal system of government – a catchall phrase that is never defined but is linked to “evil” (their word) “leftist” and “liberal” policies.^{xii} Project 2025 calls for realigning US domestic and foreign policy to reflect Christian arch-conservative principles in public policies, naming these traditional family values. This **anti-diversity, anti-gender, anti-climate** agenda calls for elimination or reversal of *all* federal protections in areas of racial and gender equality, and environmental protections. Anti-immigration reforms would gut sectors of the agricultural workforce. These are just a few highlights. (See *How Does Project 2025 Affect Me?* section of our website for details)



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The Labor Department chapter outlines a plan to integrate a conservative, religious vision of the family into every aspect of all agencies that come under the DOL umbrella: the EEOC; NLRB; National Mediation Board (NMB); Federal Mediation and Conciliation Service (FMCS); and Pension Benefit Guaranty Corporation (PBGC). A secondary goal is to ease regulations that Berry argues are stifling small businesses like “woke” – read DEI or climate -- policies. Project 2025 is designed to punish those who do not subscribe to ultra-conservative Christian values fully integrated into their personal lives, their communities, and their businesses.

Finally, the radical restructuring of other federal departments also has major labor and economic implications. This includes the global impact of shifting USAID and international assistance to reflect a pro-life/anti-choice agenda. It calls for ending US government funding for groups with programs seen as promoting reproductive health that include abortion (expanding the “Mexico City” policy to be global) – and those that serve LGBTQ+ communities. *The job loss is thus global*, given the huge scope and impact of US foreign aid programs.

The implications are hard to imagine, never mind measure. Consider just the impact of hollowing out professional expertise and reversing US policy in agencies like space and nuclear defense, or science. Add in a loyalist army guided by faith over law. The global stakes could not be higher.

See our related box, *Key Proposed Project 2025 Labor-Related Reforms*, for proposed changes impacting *business regulations, family, DEI, and religion* separate from Schedule F jobs. And watch for **updates and action resources** on our website related to labor. --**ACD**

ⁱ Wagner, Erich. “Regulations aimed at derailing a Schedule F revival proposed by OPM,” *Government Executive* online, September 15, 2023. www.govexec.com.

ⁱⁱ Mascaro, Lisa, “Conservatives aim to restructure U.S. government and replace it with Trump’s vision,” *PBS News Hour*, August 29, 2023.

ⁱⁱⁱ Moynihan, Donald. “The risks of Schedule F for administrative capacity and government accountability,” an online Commentary, *Brookings*, Brookings Institute, December 12, 2023.

^{iv} 5 U.S. Code § 2302 - Prohibited personnel practices | U.S. Code | US Law | LII / Legal Information Institute (cornell.edu)

^v Prohibited Personnel Practices Overview, U.S. Office of Special Counsel website. Web: osc.gov

^{vi} Ibid.

^{vii} “Top Senate-confirmed Political Appointees Over Time,” online at the Center for Presidential Transition website.

^{viii} Email-correspondence with author, unpublished draft analysis of Project 2025’s proposed reforms on the federal labor force by Steve Lenkart, Executive Director of the National Federation of Federal Employees (NFFE), February 2024. See NFFE website for Lenkart’s March 1, 2024, Congressional testimony at a Senate hearing on Merit System Principles and Schedule F.

^{ix} “FAQs on the Vacancies Act,” e-informational brief, US Government Accountability Office.

^x Lanard, Noah. “Trump Loyalists Lay Out Plan for Second Term: Gut Worker Protections,” *Mother Jones*, August 1, 2023.

^{xi} Ibid. Note 8.

^{xii} Read our *Reader’s Guide to Project 2025’s Propaganda* for a deeper discussion of the “anti-woke” rhetorical attack strategy.