



Education for All Summary of Project 2025

What May be Coming for Higher Education

Project 2025 raises a variety of concerns and opportunities for higher education. The concerns lay in what we have called a trifold attack on:

- Institutional autonomy,
- Diversity, Equity and Inclusion efforts, and
- Academic Freedom.

Often the First Amendment is used to suggest that Critical Race Theory or attention to identities is a violation of the Constitution. However, this is not the case.

There are a variety of excellent suggestions, regarding the role that community colleges can play in accelerating students to the workforce. These suggestions do need to be coupled with the thinking that Project 2025 correctly lays out, which is that outcomes are often hindered by a variety of factors. Whereas DEI focuses on these facts, Project 2025 desires a focus on family structure, which, in the 1980s, was used as a trope to marginalize the already-marginalized.

How this Document is Organized

Below are excerpts from Project 2025 that impact higher education directly. Headings indicate themes. Solid bullets indicate policy recommendations. Hollow bullets provide further context. Unless otherwise noted this is bullets consist of language taken directly from Project 2025.

Equitable Outcomes that may Lead to Prohibition of Disaggregation of Data

- The National Assessment of Educational Progress (NAEP) and other data collections currently release data by race, ethnicity, socioeconomic status, English language proficiency, disability, and sex. However, one of the most important—if not the most important—factor influencing student educational achievement and attainment is family structure. The Department of Education (or whichever agency collects such data long term) should make student data available by family structure to the public, including as part of its Data Explorer tool.

Concerns about Financial Aid and Academic Freedom/DEI

- Federal officials should protect educators and students in jurisdictions under federal control from racial discrimination by reinforcing the Civil Rights Act of 1964 and prohibiting compelled speech. Specifically, no teacher or student in Washington, D.C., public schools, Bureau of Indian Education schools, or Department of Defense schools should be compelled to believe, profess, or adhere to any idea, but especially ideas that violate state and federal civil rights laws.
- Safeguarding civil rights. Enforcement of civil rights should be based on a proper understanding of those laws, rejecting gender ideology and critical race theory.
- CRT: As such, lawmakers should design legislation that prevents the theory from spreading discrimination.
 - Although student loans and grants should ultimately be restored to the private sector (or, at the very least, the federal government should revisit its role as a guarantor, rather than direct lender) federal postsecondary education investments should bolster economic growth, and recipient institutions should nourish academic freedom and embrace intellectual diversity. That has not, however, been the track record of federal higher education policy or of the many institutions of higher education that are hostile to free expression, open academic inquiry, and American exceptionalism. Federal postsecondary policy should be more than massive, inefficient, and open-ended subsidies to “traditional” colleges and universities.
- The next Administration should work with Congress to amend FERPA and PPRA to provide parents and students over the age of 18 years with a private right of action to seek injunctive and declaratory relief, together with attorneys’ fees and costs if a prevailing party, against educational institutions and agencies that violate rights enshrined in these statutes. This will empower parents and students, level the playing field between families and education bureaucracies, and encourage institutional compliance with these statutory requirements.
 - By its very design, critical race theory has an “applied” dimension, as its founders state in their essays that define the theory. Those who subscribe to the theory believe that racism (in this case, treating individuals differently based on race) is appropriate—necessary, even—making the theory more than merely an analytical tool to describe race in public and private life. The theory disrupts America’s Founding ideals of freedom and opportunity. So, when critical race theory is used as part of school activities such as mandatory affinity groups, teacher training programs in which educators are required to confess their privilege, or school assignments in which students must defend the false idea that America is systemically racist, the theory is actively disrupting the values that hold communities together such as equality under the law and colorblindness.
 - MG Comment: this is not what CRT espouses. However, colorblindness, a foundation of 1980s policy that led to significantly disparate outcomes, is a problematic tenant.
 - Furthermore, school officials should not require students or teachers to believe that individuals are guilty or responsible for the actions of others based on race or ethnicity.
 - No teachers do this.
 - The Protection of Pupil Rights Amendment (PPRA) requires schools to obtain parental consent before asking questions, including surveys, about political affiliations or beliefs;

mental or psychological issues; sexual behaviors or attitudes; critical appraisals of family members; illegal or self-incriminating behavior; religious practices or beliefs; privileged relationships, as with doctors and clergy; and family income, unless for program eligibility.

- This is contrary to academic freedom and learning if required of higher ed.
- At the same time, Congress should also consider equipping parents with a private right of action. Two federal laws provide certain privacy protections for students attending educational institutions or programs funded by the department. The Family Educational Rights and Privacy Act (FERPA) protects the privacy of student education records and allows parents and students over the age of 18 to inspect and review the student's education records maintained by the school and to request corrections to those records.
- Found later in the document, but referring to the above: The Department of Education should be transparent about complaints filed on behalf of families regarding the Family Educational Rights and Privacy Act (FERPA) and the Protection of Pupil Rights Amendment (PPRA).

Policy Recommendations Antithetical to Academic Freedom, DEI, and Focused on Institutions Overreaching

- The next President should issue a series of executive orders requiring:
 - An accounting of how federal programs/grants spread DEI/CRT/ gender ideology, A review of outcomes for GEAR UP and the 21st Century grants programs,
 - A report on the negative influence of action civics on students' understanding of history and civics and their disposition toward the United States,
 - An update of the Coleman report to show the impact of family structure on student achievement, A full accounting of CARES Act education expenditures, and A report on how many dollars make their way to the classroom in every federal education grant and program.

Recommendations to Eliminate 'Area Studies' and Subsequently Take Control of Curriculum; Limit Institutional Autonomy

- Congress should wind down so-called "area studies" programs at universities (Title VI of the HEA), which, although intended to serve American interests, sometimes fund programs that run counter to those interests.
- In the meantime, the next Administration should promulgate a new regulation to require the Secretary of Education to allocate at least 40 percent of funding to international business programs that teach about free markets and economics and require institutions, faculty, and fellowship recipients to certify that they intend to further the stated statutory goals of serving American interests.

Grants Being Limited based on Institutional Conformity

- Protect the First Amendment. The President should issue an executive order requiring grant applications (SF-424 series) to contain assurances that the applicant will uphold the First Amendment in funded programs and work.

Recommendations about Gender Identity

- No public education employee or contractor shall use a name to address a student other than the name listed on a student's birth certificate, without the written permission of a student's parents or guardians. No public education employee or contractor shall use a pronoun in addressing a student that is different from that student's biological sex without the written permission of a student's parents or guardians. No public institution may require an education employee or contractor to use a pronoun that does not match a person's biological sex if contrary to the employee's or contractor's religious or moral convictions.

Title IX

- Work with Congress to amend Title IX to include due process requirements; define "sex" under Title IX to mean only biological sex recognized at birth; and strengthen protections for faith-based educational institutions, programs, and activities.
- The next Administration should abandon this change redefining "sex" to mean "sexual orientation and gender identity" in Title IX immediately across all departments...[and] "sex" is properly understood as a fixed biological fact"

Accreditation Limitations and Radical Changes Therein

- Prohibit accreditation agencies from leveraging their Title IV gatekeeper role to mandate that educational institutions adopt diversity, equity, and inclusion policies.
 - Perhaps more distressingly, accreditors, while professing support for academic freedom and campus free speech, have presided over a precipitous decline in both over the past decade. Despite maintaining criteria that demand such policies, accreditors have done nothing to dampen the illiberal chill that has swept across American campuses over the past decade.
 - Revamp the system for recognizing accreditation agencies for Title IV purposes by removing the department's monopoly on recognition by (1) authorizing states to recognize accreditation agencies for Title IV gatekeeping purposes and/or (2) authorizing state agencies to act as accreditation agencies for institutions throughout the United States.
- The Secretary of Education should refuse to recognize all accreditors that abuse their power. New accreditors should also be encouraged to start up.
- The President should issue an executive order pursuing antitrust against college accreditors, especially the American Bar Association (ABA).
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Opening the Door for More State-Based Control and Therefore Less Institutional Control

- Protect the sovereignty of states to decide governance and leadership issues for their state-supported colleges and universities by prohibiting accreditation agencies from intruding upon the governance of state-supported educational institutions.
- Restoring state and local control over education funding. As Washington begins to downsize its intervention in education, existing funding should be sent to states as grants over which they

have full control, enabling states to put federal funding toward any lawful education purpose under state law.

- Treating taxpayers like investors in federal student aid. Taxpayers should expect their investments in higher education to generate economic productivity. When the federal government lends money to individuals for a postsecondary education, taxpayers should expect those borrowers to repay.

Johnsonian Commission and how Our Sector Can Leverage

For most of our history, the federal government played a minor role in education. Then, over a 14-month period beginning in 1964, Congress planted the seeds for what would become the U.S. Department of Education (ED or the department). In July of that year, President Lyndon B. Johnson signed into law the Civil Rights Act of 1964, after Congress reached a consensus that the mistreatment of black Americans was no longer tolerable and merited a federal response.

Higher Ed Reorg—Resituate Community Colleges by Partnering in the Following Areas

- Data collection efforts in higher education should also be improved by housing higher education data at the Department of Labor. This would provide more transparency in evaluating postsecondary education and workforce training program outcomes; contextualize those results based on trends observed more generally; enable the adjusting of real wages to account for regional differences in earnings and cost of living; and develop a reliable methodology for risk adjusting institutional and program outcomes to more accurately reflect the value added of education programs (as opposed to their admissions selectivity).
- Open enrollment institutions post the weakest outcomes, largely because life is challenging and complicated for low-income and non-traditional students, who may be forced to drop out when a work schedule changes, a child needs more attention, or an unexpected repair or medical bill makes continuing impossible. Such confounding factors make it difficult to isolate the impact of educational quality versus socioeconomic factors on student outcomes.
- Higher education outcomes data should be similarly “risk adjusted” to more carefully isolate the impact of educational quality versus socioeconomic status and other factors on college outcomes.
- New regulations should clarify the definition and requirements of regular and substantive interaction for competency-based education, as well as for online programs.
- Congress should create an employer grant worth up to \$10,000 per year or pro-rated portion thereof for each worker engaged in The Conservative Promise on-the-job training, defined as some share of paid time spent in a formal training program.
- Prohibit use of BA in Govt job postings