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# Diversity, Equity, and Inclusion and Project 2025

## What it Says and What to Do

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# Introduction

You've likely heard something about Project 2025 either in the news or on social media. Project 2025 is a stunningly dangerous plan by conservative think tanks and organizations to undermine, roll back, and eliminate the protections and human rights that define American society. While Donald Trump has tried to distance himself from Project 2025, many of Trump's allies and administrators architected the plan to eliminate protections from reproductive rights to climate change. In July, Project 2025 Director Paul Dans stepped down amid criticism. However, Project 2025 is still relevant and would radically reshape American life. On diversity, equity, and inclusion, specifically, Project 2025 seeks to totally eliminate these values from the fabric of American society.

Now is the time for leaders to stand firm in upholding the values of diversity, equity, and inclusion, which brings opportunity to all Americans. Diversity, equity, and inclusion is a part of our shared **vision for our country, where everyone has a fair shot at success. To uphold diversity, equity, and inclusion against Project 2025, we encourage leaders to communicate the successful outcomes and results of their diversity, equity, and inclusion programs, strengthen their diversity, equity, and inclusion policies internally, and develop a plan for the upcoming change in administration.** To help you, we describe what Project 2025 says about diversity, equity, and inclusion and what you can do to stay the course.

# What is Project 2025?

Project 2025 is a presidential transition project led by The Heritage Foundation and hundreds of conservative organizations. Project 2025 is the plan for the next conservative President and Administration. Project 2025 seeks to "dismantle the administrative state" by implementing policies that take away fundamental rights like reproductive justice and diversity, equity, and inclusion (to name a few).

**4 Pillars of Project 2025**

> ❯ **The Mandate for Leadership** (which this document details): the volume states a conservative consensus on how major federal agencies should be governed.
>
> ❯ **A personnel database**: a database of candidates to share their recommendations with the conservative President-elect's team.
>
> ❯ **A Presidential Administration Academy**: a training system on the conservative agenda and how to function within government.
>
> ❯ **A Playbook**: agency teams and transition plans to deploy once a conservative President is inaugurated on day one.

# What does Project 2025 say about Diversity, Equity, Inclusion?

Project 2025 seeks to dismantle all the ways in which diversity, equity, and inclusion diversity, equity, and inclusion have influenced and integrated the federal government. The primary recommendation to eliminate diversity, equity, and inclusion is under the promise to "restore the American family as the centerpiece of American life and protect our children." (The Mandate for Leadership page 3)

Project 2025 recommends the next conservative President "delete the terms 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, and any other term used to deprive Americans of their First Amendment rights out of every federal rule, agency regulation, contract, grant, regulation, and piece of legislation that exists. (The Mandate for Leadership page 4)

**Project 2025's Mandate for Leadership includes specific policy recommendations to dismantle diversity, equity, and inclusion within government agencies. The types of recommendations include:**

- ❯ Eliminating chief diversity officers and similar roles, diversity, equity, and inclusion committees, and equity plans;

- ❯ Establishing anti-diversity, equity, and inclusion task forces to determine the scope, breadth, and depth of diversity, equity, and inclusion initiatives;

- ❯ Retaliating against professionals who participated in diversity, equity, and inclusion initiatives and treating their participation as grounds for termination of employment;

- ❯ Shifting federal funding priorities for programs and grants that support diversity, equity, and inclusion initiatives. This would impact nonprofits, educational institutions, and community organizations that rely on such funding to advance diversity, equity, and inclusion goals; and

- ❯ Making it impossible to prove discrimination by prohibiting the collection of EEO-1 data (e.g. representation data like race/ethnicity), eliminating disparate impact liability as a valid theory of discrimination and forbidding its use in analysis.

Taken together, these policy recommendations would not only erase the protections that prove discrimination but also prohibit access to opportunity for all. This is dangerous and unnerving. We do not (yet) live in a society where marginalized identities (like race, sex, sexual orientation) do not impact our access to opportunity and fair outcomes. Collecting data, drafting equity plans, and having leaders manage diversity, equity, and inclusion work help level the playing field. Project 2025 would eliminate all the progress and protections we enjoy today. For example, in 2021, President Biden signed an executive order requiring federal agencies to invest in diversity, equity, and inclusion programs/trainings and appoint leaders to spearhead diversity, equity, and inclusion initiatives. Project 2025 not only wants to eliminate these initiatives but also hold staff accountable for participating: "Treat the participation in any critical race theory or diversity, equity, and inclusion initiative, without objecting on constitutional or moral grounds, as per se grounds for termination of employment." Treating participating in diversity, equity, and inclusion programs as grounds for termination will undoubtedly create cultures of fear and intimidation. This type of "accountability" (better stated as retaliation) would put employees in jeopardy of losing their jobs and livelihoods simply because they participated in learning more about how to create better access to opportunities for everyone, regardless of background. Furthermore, by getting rid of EEO-1 data, leaders have no tools for measuring and understanding where disparity exists. No tools mean no solutions, which make it easier for those in power to say disparities in promotion, advancement, and hiring do not exist. Without data, leaders have no way of measuring how their diversity, equity, and inclusion programs open the door of opportunity for individuals from historically marginalized groups. Without the ability to measure success through data, we collectively lose our ability to advance the work in quantitative ways.

# What should you do to support diversity, equity, & inclusion?

## 1. *Seek more information for yourself (and your team):*

❱ Understanding how conservative organizations have co-opted the values of diversity, equity, and inclusion is critical. Since many people are unfamiliar with what "DEI" stands for, conservative activists have co-opted the acronym to make it about hiring quotas — hiring talent solely based on race/ethnicity and not qualifications. This is untrue. Diversity, equity, and inclusion is a value system that widens the door of opportunity for all people, regardless of background. Diversity, equity, and inclusion ensures we acknowledge all the factors that make up an individual and the assets they bring to an organization or role, including identity.

❱ Discuss Project 2025 with your team, including how you will combat information that is incorrect like DEI meaning hiring quotas. Develop a plan and communicate that plan to leadership and employees across your organization. Use this resource to know what's included in Project 2025 and how it could negatively impact your organization's diversity, equity, and inclusion work.

## 2. *Effectively communicate diversity, equity, and inclusion's value and results:*

❱ Clearly explain the tangible benefits and outcomes of diversity, equity, and inclusion, such as improved team performance, innovation, and employee satisfaction. Use real-world examples and data to show how diverse and inclusive workplaces are more successful. This helps to shift conversations from abstract ideals to practical outcomes that resonate with a larger demographic. For example, LVMH reported that its selective retailing, which is the unit that houses Sephora, earned a year-over-year revenue increase of 25% ($19.4 billion) in 2023. Sephora took in $10 billion in revenue. Sephora's VP of DEI strengthened the company's business model by widening interview pools to achieve parity in leadership, signing a 15% pledge to ensure their shelf space reflected diverse brands, and commissioning a racial bias in retail study (see Forbes).

❱ Develop stories and examples that illustrate the positive impact of diversity, equity, and inclusion in organizations and communities. Sharing personal stories or anecdotes can make diversity, equity, and inclusion efforts feel more relatable and compelling. When people hear about individual experiences they're more likely to understand the importance of initiatives and support them. People that have direct experiences with diversity, equity and inclusion tend to view it positively.

❱ Be proactive in addressing misunderstandings and misinformation about diversity, equity, and inclusion. Provide accurate information and be prepared to explain why diversity, equity, and inclusion is not just a trend but a necessary and ongoing effort. This may involve debunking myths or clarifying what diversity, equity, and inclusion actually entails versus common misconceptions. For instance, firmly state that it is incorrect to label anyone a "DEI hire". Such language creates an "us. vs. them" mentality. Diversity, equity, and inclusion do not determine who gets hired. Qualifications do and diversity, equity, and inclusion should never be about checking a box. Diversity, equity, and inclusion ensures all people feel respected and valued so that they can contribute their best at work which benefits us all.

### 3. *Audit & scenario plan:*

Meet with decision-makers in your organization to plan for a change in Administration. Plan for either outcome and ask important questions, including but not limited to:

❯ How can your organization stand for its values? How can you use your brand/reputation to activate others in supporting diversity, equity and inclusion? How can you demonstrate your commitment internally? Externally?

❯ What is your role in advocacy for these programs and their continuity?

❯ Are there any flashpoints (e.g. unplanned events) that can help or hinder your intended goals on diversity, equity and inclusion?

❯ Is your organization a federal contractor and/or recipient of federal funds? If so, how would your DEIdiversity, equity, and inclusion initiatives and language need to shift if Project 2025 is implemented?

❯ How do you collect data to measure diversity, equity, and inclusion? To what extent do you rely on EEOC-1 data? What could you do if this data is no longer available?

### 4. *Strengthen internal diversity, equity, and inclusion policies:*

If you are in a leadership position, ensure that your organization has strong diversity, equity, and inclusion policies and practices in place (e.g., equitable hiring practices, bias training).

Draft and implement policies that explicitly state your organization's commitment to diversity, equity, and inclusion. Ensure these policies comply with local, state, and federal laws.

❯ Establish clear, measurable diversity, equity, and inclusion goals and objectives. This could include improving representation at all levels of the organization and reducing disparities in pay and promotion rates.

❯ Regularly review and update your organization's policies. diversity, equity, and inclusion is an ongoing effort that evolves over time. Regularly review and update your policies to ensure they are effective and aligned with current best practices and the changing landscape.

## Do you want to solidify your diversity, equity, and inclusion programs?

Raben can help; reach out to info@raben.co for more information.

*Note: This document is a general resource on this topic. It is not legal advice. If you want advice on how Project 2025 could impact your own organization's specific diversity, equity, and inclusion (DEI) practices, please seek advice from your legal counsel. The quotations included are for informational purposes only. Raben does not endorse the views of the individuals or organizations referenced.*

# Appendix A: The Mandate for Leadership mention of Diversity, Equity, & Inclusion

*This appendix includes a table that outlines where diversity, equity, and inclusion are mentioned. The agency-specific excerpts are listed as they appear in The Mandate for Leadership.*

| Federal Agency | Pages Where DEI is Mentioned |
|---|---|
| Agency for International Development (USAID) | 258 |
| Department of Education | 355; 358-359 |
| Department of Energy | 370 |
| Department of Housing and Urban Development | 508 |
| Department of Justice | 561-562 |
| Department of Labor | 582-585; 587 |
| Department of Treasury | 708 |
| Fair Trade Commission | 873-874 |