



Project 2025: Implications for Housing, Lending, & Technology

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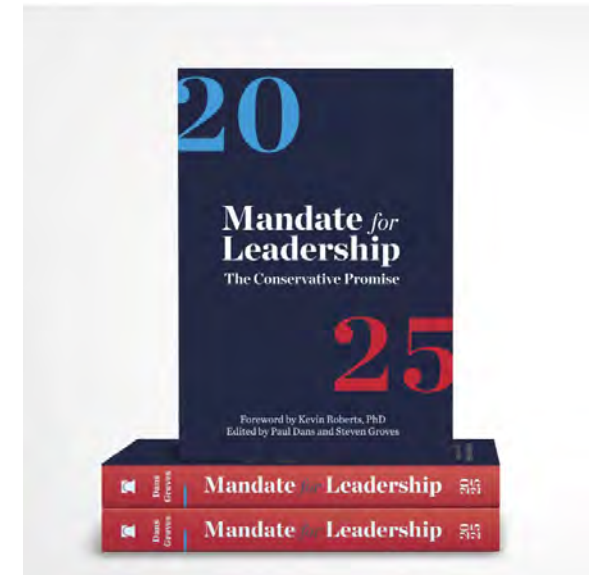


Background on Project 2025



***In their own words:** It is not enough for conservatives to win elections. If we are going to rescue the country from the grip of the radical Left, we need both a governing agenda and the right people in place ready to carry this agenda out on Day One of the next conservative Administration. This is the goal of the 2025 Presidential Transition Project. [Project 2025 website]*

- Despite America’s founding principles of liberty and justice for all, there are those that would prefer non-democratic strict hierarchies based on race, gender, religion, and wealth.
- Project 2025 was authored by the Heritage Foundation, an extremist think tank, to gut progress toward equity, including housing and lending opportunities.
- Project 2025 outlines the policy priorities for extremists in federal and state executive offices, legislature, and the courts.
- Project 2025 would harm all of us—children, people of color, women, immigrants, people with disabilities, older-Americans, people of faith, students, LGBTQ+, families, and more.



Project 2025 Key Issues



Gut Checks and Balances by concentrating power in the President, replacing career civil servant experts with ideologues who can be easily fired if they are perceived as disloyal to the President, eliminating the independence of the DOJ and FBI, and weaponizing the DOJ as an arm of the President.



Turn Back the Clock on Racial Equity by limiting discrimination claims to overt intentional discrimination, weaponizing the DOJ to reverse equity plans, limiting the ability of the DOJ to pursue discrimination claims on behalf of people of color, banning the use of federal funds for racial equity and anti-discrimination training, including affirmative action, and removing policies designed to achieve racial equity.



Minimize Access to Fair and Affordable Housing by abolishing disparate impact and settlements in housing discrimination cases, abandoning the “affirmatively furthering fair housing” rule, reversing efforts to address appraisal bias, prioritizing single-family homes only, raising the cost of FHA mortgage insurance, dismantling HUD, winding down Fannie Mae and Freddie Mac and transferring their assets to private market players.



Retreat from Fair Lending by abolishing the Consumer Financial Protection Bureau (CFPB), eliminating Special Purpose Credit Programs, terminating Treasury employees engaged in equity initiatives, and abolishing the longstanding use of disparate impact and settlements to address lending discrimination.



Discriminate against Immigrants by disrupting families and communities by prohibiting non-citizens from living in federally-assisted housing, and by engaging in mass deportations through nationwide expedited removals.



Attack LGBTQ+ Identity by rolling back protections against discrimination on the basis of sexual orientation and gender identity and by refocusing government policies to promote the “heterosexual married working man” as the ideal.



Eliminate Climate Change and Responsible AI Initiatives That Protect the Community by cutting off public access to objective weather data, dismantling initiatives that incorporate climate change considerations in decisions about the nation’s housing and financial system, eliminating funding to support responsible AI research, and revoking federal climate and AI policies that advance racial justice.



Weaponize Data and AI Systems by dismantling the race/ethnicity data collection used to detect discrimination, removing tools that promote equitable technologies, and weaponizing government data to identify non-citizens and surveil women.

Gut checks and balances



***In their own words:** “The great challenge confronting a conservative President is the existential need for aggressive use of the vast powers of the executive branch to return power—including power currently held by the executive branch—to the American people. Success in meeting that challenge will require a rare combination of boldness and self-denial: boldness to bend or break the bureaucracy to the presidential will and self-denial to use the bureaucratic machine to send power away from Washington and back to America’s families, faith communities, local governments, and states.” [44]*

Project 2025 would...

- Concentrate power in the president, replace career civil servant experts with [idealogues](#) who can be easily fired if they are perceived as disloyal to the President, eliminate the independence of the DOJ and FBI, and weaponize the DOJ as an arm of the President.

Sample Plans

- “Schedule F” Reforms. Re-classify thousands of policy-making civil servant experts as “Schedule F” employees who are excepted from civil service rules and more easily discharged. [80]
- Personnel Pipeline. Engage in a large-scale headhunting effort to find new personnel through a database, an ideological questionnaire, discriminatory intelligence tests, and a “Presidential Training Academy” aimed at advancing MAGA ideas. [72]
- HUD. Assign all delegated powers to politically appointed leadership positions and change any current career leadership positions into political and non-career appointment positions. [508]
- DOJ. “Issue guidance to ensure that litigation decisions are consistent with the President’s agenda and the rule of law...Ensure that, consistent with this principle, the department’s leadership is prepared to impose appropriate disciplinary action as circumstances arise.” [558-559] “Support a vast expansion of the number of appointees in every DOJ office and component across the department—especially in the Civil Rights Division, the FBI, and the EOIR.” [569]



Turn back the clock on racial equity



In their own words: “Entities across the private and public sectors in the United States have been besieged in recent years by an unholy alliance of special interests, radicals in government, and the far Left. This unholy alliance speaks in platitudes about advancing the interests of certain segments of American society, but that advancement comes at the expense of other Americans and in nearly all cases violates long-standing federal law...[T]he Biden Administration— through the DOJ’s Civil Rights Division and other federal entities—has enshrined affirmative discrimination in all aspects of its operations under the guise of ‘equity.’ Federal agencies and their components have established so-called diversity, equity, and inclusion (DEI) offices that have become the vehicles for this unlawful discrimination, and all departments and agencies have created ‘equity’ plans to carry out these invidious schemes.” [561]

Project 2025 would...

- Limit discrimination claims to overt intentional discrimination; weaponize the DOJ to [reverse equity plans](#); limit the ability of the DOJ to pursue discrimination claims on behalf of people of color; ban the use of federal funds for racial equity and anti-discrimination training, including affirmative action; and remove policies designed to achieve racial equity.

Sample Plans

- Disparate Impact. Abolish the government’s use of the disparate impact theory of discrimination; only overt intentional discrimination would be pursued. [72] “Disparities do not (and should not legally) imply discrimination per se.”[583]
- DEI. Require the DOJ to spearhead a government-wide initiative to reverse the equity plans and DEI initiatives. [561-562] Refocus the DOJ Civil Rights Division to use “the full force of federal prosecutorial resources to investigate and prosecute all state and local governments, institutions of higher education, corporations, and any other private employers who are engaged in discrimination in violation of constitutional and legal requirements.” [561-562]
- CRT/DEI Training. Issue an executive order banning the federal government from using taxpayer dollars to fund critical race theory training. “The Biden Administration has pushed ‘racial equity’ in every area of our national life, including in employment, and has condoned the use of racial classifications and racial preferences under the guise of DEI and critical race theory, which categorizes individuals as oppressors and victims based on race.” [582]



Credit: Steve Schapiro/Corbis via Getty Images

Minimize access to fair and affordable housing



In their own words: “HUD programs tend to perpetuate the notion of bureaucratically provided housing as a basic life need and...fail to acknowledge that these public benefits too often have led to intergenerational poverty traps, have implicitly penalized family formation in traditional two-parent marriages, and have discouraged work and income growth....” [503]

Project 2025 would...

- Abolish the longstanding, Supreme Court-approved use of disparate impact theory to address discrimination and the government’s longstanding use of settlements in housing discrimination cases; abandon the implementation of the 1968 Fair Housing Act provision to “affirmatively further fair housing”; reverse efforts to address appraisal bias; prioritize single-family homes only; raise the cost of FHA mortgage insurance; dismantle HUD; and privatize Fannie Mae and Freddie Mac in a way that would essentially eliminate the 30-year, fixed-rate, fully-amortizing mortgage loan.

Sample Plans

- Disparate Impact. Abolish the government’s use of the disparate impact theory of discrimination; only overt intentional discrimination would be pursued. [72, 583]
- Civil Rights Settlements. DOJ should only enforce civil rights laws in the courts and not use administrative tools to address discrimination (e.g., consent decrees). [558]
- AFFH. “Repeal the Affirmatively Furthering Fair Housing (AFFH) regulation reinstated under the Biden Administration any other uses of special-purpose credit authorities to further equity.” [508]
- Appraisal Reform. “Immediately end the Biden Administration’s Property Appraisal and Valuation Equity (PAVE) policies and reverse any Biden Administration actions that threaten to undermine the integrity of real estate appraisals.” [508]
- Housing Access. Encourage Congress to prioritize legislative support for the single-family home; oppose any efforts to weaken single-family zoning. [511] FHA should increase the cost of mortgage insurance. [510]
- HUD Overhaul. “Congress could consider a wholesale overhaul of HUD that contemplates devolving many HUD functions to states and localities with any remaining federal functions consolidated to other federal agencies.” [512]
- GSE Reform. “Move toward privatization of these massive housing finance agencies” in a way “that does not rely on explicit or implicit taxpayer guarantees.” [706]



Retreat from fair lending



In their own words: “The CFPB is a highly politicized, damaging, and utterly unaccountable federal agency. It is unconstitutional...[T]he next conservative President should order the immediate dissolution of the agency—pull down its prior rules, regulations and guidance, return its staff to their prior agencies and its building to the General Services Administration.”

Project 2025 would...

- Abolish the Consumer Financial Protection Bureau (CFPB), eliminate Special Purpose Credit Programs, terminate Treasury employees engaged in equity initiatives, and abolish the longstanding use of disparate impact and settlements to address lending discrimination.

Sample Plans

- CFPB. “Congress should abolish the CFPB and reverse Dodd–Frank Section 1061, thus returning the consumer protection function of the CFPB to banking regulators and the Federal Trade Commission.” [839]
- Treasury Equity Initiatives. Eliminate Treasury’s Counselor for Racial Equity; Advisory Committee on Racial Equity; and Office for Diversity, Equity, Inclusion, and Accessibility. “Treat the participation in any critical race theory or DEI initiative, without objecting on constitutional or moral grounds, as per se grounds for termination of employment.” [708]
- Fannie Mae and Freddie Mac. Treasury should take the lead in ending the conservatorship. [706]
- Ginnie Mae & FHA. Treasury should ensure that these agencies are “right-sized” to serve a defined mission. [706]
- See also Disparate Impact [72, 334, 335, 336, 583] and Civil Rights Settlements [558].



Discriminate against immigrants



***In their own words:** “A labor agenda focused on the strength of American families must put American workers first. As the family necessarily puts the interests of its members first, so too the United States must put the interests of American workers first.” [546]*

Project 2025 would...

- Disrupt families and communities by prohibiting non-citizens from living in federally-assisted housing; and engaging in mass deportations through nationwide expedited removals, which deny undocumented immigrants the opportunity for hearings and appeals.

Sample Plans

- No Non-Citizens in Federally-Assisted Housing. “The Office of the [HUD] Secretary should recommence proposed regulations put forward under the Trump Administration that would prohibit noncitizens, including all mixed-status families, from living in all federally assisted housing.” [509]
- Immigration Status. “HUD reforms must also ensure alignment with reforms implemented by other federal agencies where immigration status impacts public programs, certainly to include any reforms in the Public Charge regulatory framework administered by the U.S. Department of Homeland Security (DHS).” [509]
- Oversight of Foreign Ownership of Real Estate. “The President should issue an executive order making the HUD Secretary a member of the Committee on Foreign Investment in the U.S., which will gain broader oversight authorities to address foreign threats, particularly from China with oversight of foreign ownership of real estate in both rental and ownership markets of single-family and multifamily housing.” [508]
- Expedited Removal. “[M]ake full use of Expedited Removal authorities. [ICE] has limited the use of ER to eligible aliens apprehended within 100 miles of the border. This is not a statutory requirement.”[142]



Attack LGBTQ+ Identity



In their own words: “The Family Agenda. The [HHS] Secretary’s antidiscrimination policy statements should never conflate sex with gender identity or sexual orientation. Rather, the Secretary should proudly state that men and women are biological realities that are crucial to the advancement of life sciences and medical care and that married men and women are the ideal, natural family structure because all children have a right to be raised by the men and women who conceived them.” [489]

Project 2025 would...

- Roll back protections against discrimination on the basis of sexual orientation and gender identity, including in housing and lending and re-orient government policies at every level to focus on promoting the “heterosexual married working man” as the ideal.

Sample Plans

- Sexual Orientation and Gender Identity. Eliminate all regulatory guidance that followed the Supreme Court’s *Bostock* employment discrimination case, which interpreted discrimination on the basis of “sex” to include sexual orientation and gender identity. [584, 586]
- LGBTQ+ Equity. Repeal policies focusing on LGBTQ+ equity, which “subsidize single-motherhood, disincentivizing work, and penalizing marriage...[These policies] should be repealed and replaced by policies that support the formation of stable, married, nuclear families.” [451] “Families comprised of a married mother, father, and their children are the foundation of a well-ordered nation and healthy society.” [451]
- Heterosexual Fathers. “Working fathers are essential to the well-being and development of their children....In the overwhelming number of cases, fathers insulate children from physical and sexual abuse, financial difficulty or poverty...and a host of behavioral and psychological problems. HHS should prioritize married father engagement in its messaging, health, and welfare policies. [451]



Abolish climate change and responsible AI initiatives that protect the community

“**In their own words:** The National Oceanographic and Atmospheric Administration (NOAA), including the National Weather Service, “has become one of the main drivers of the climate change alarm industry...NOAA today boasts that it is a provider of environmental information services, a provider of environmental stewardship services, and a leader in applied scientific research. Each of these functions could be provided commercially, likely at lower cost and higher quality.” [674-675] “The next Administration will face a significant challenge in unwinding policies and procedures that are used to advance radical gender, racial, and equity initiatives under the banner of science.” [60]

Project 2025 would...

- Cut off the public’s access to objective weather data and warnings by disbanding NOAA, which includes the National Weather Service, dismantle agency offices and initiatives that incorporate climate change considerations in decisions about the nation’s housing and financial system, eliminate funding to support responsible AI research, and revoke federal climate and AI policies that advance racial justice.

Sample Plans

- NOAA. “The National Oceanographic and Atmospheric Administration (NOAA) [including the National Weather Service] should be dismantled and many of its functions eliminated, sent to other agencies, privatized, or placed under the control of states and territories.” [664]
- Housing and Financial. “Repeal climate change initiatives and spending in the [HUD] budget request.” [508] “Eliminate the [Treasury’s] Climate Hub Office and withdraw from climate change agreements that are inimical to the prosperity of the United States.” [708] “[C]lamp down on the [Federal Reserve’s] incorporation of environmental, social, and governance factors into its mandate.” [740]
- ESG. “The next Administration should use Treasury’s tools and authority to promote investment in domestic energy, including oil and gas. It should reverse support for international public- (and private-) based efforts promoting Environmental, Social, and Governance.” [709]
- Science. “The woke agenda should be reversed and scrubbed from all policy manuals, guidance documents, and agendas...” [60]



Weaponize data and AI systems



In their own words: “The CDC’s abortion surveillance and maternity mortality reporting systems are woefully inadequate...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.” [455]

Project 2025 would...

- Dismantle the race/ethnicity data collection used to detect discrimination, remove tools that promote equitable technologies, and weaponize government data to identify non-citizens and surveil women.

Sample Plans

- Small Business Data. Congress should repeal Dodd-Frank Section 1071 for small business data collection. [839]
- Race/Ethnicity Data. Stop EEOC collection of race/ethnicity data, which “can then be used to support a charge of discrimination under a disparate impact theory.” [583] Thoroughly review changes to census race/ethnicity data. “There are concerns among conservatives that the data under Biden Administration proposals could be skewed to bolster progressive political agendas.” [680]
- Citizenship Data. Add a citizenship question to the census. [680] Condition FEMA assistance on the state providing total access to data from the department of motor vehicles and voter registration for purposes of immigration enforcement. [138]
- Surveillance of Women. 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.” [455]
- Science and Responsible AI. Remove equity- and justice-based provisions from rules, guidelines, contracts, procedures, and manuals [59, 60]
- See also Disparate Impact [72, 334, 335, 336, 583] and Civil Rights Settlements [558].



National Fair Housing Alliance Priorities



Increase Access to Fair and Affordable Housing:

Legislative--

- Pass the Downpayment Toward Equity Act (\$100B for first-gen homebuyers), Housing Crisis Response Act, Neighborhood Homes Investment Act with fair housing protections.

Regulatory--

- HUD: finalize the rule for the Fair Housing Act's "Affirmatively Further Fair Housing" Provision.
- Treasury/EPA/DOT: Provide oversight and ensure federal infrastructure investments in the Inflation Reduction Act, Bipartisan Infrastructure Bill, CHIPS and Science Act complies with the Fair Housing Act's affirmatively furthering fair housing mandate.
- FHFA: Finalize the FHLBank guidance re Mission and Affordable Housing Application.



Promote Racial and Gender Equity:

Regulatory--

- DOJ/HUD/CFPB/Federal Financial Regulators: Ensure robust enforcement of the Fair Housing Act and the Equal Credit Opportunity Act (including by using the disparate impact theory) to ensure fair housing; fair lending; and fair automated systems, including AI.



Strengthen Local Fair Lending Enforcement:

Legislative--

- To address the record number of fair housing discrimination complaints, and increase critical funding for local nonprofit private organizations assisting victims of housing discrimination with being made whole and HUD's Office of Fair Housing and Equal Opportunity:
 - HUD's FHEO staffing (\$153M)
 - FHIP (\$125M), and
 - FHAP (\$36.6M).

Regulatory--

- Prioritize the appointment of individuals with diverse backgrounds and civil and human rights expertise (DOJ, HUD, CFPB, Treasury, and Federal Financial Regulators).



Promote Fair Lending and Responsible AI:

Legislative--

- Enact comprehensive AI legislation with civil and human rights protections and increase funding for Responsible AI research.

Regulatory--

- All Agencies: Implement the AI Executive Order, and hire people with and train staff on responsible AI skills
- HUD/PAVE: Finalize the Action Plan to address appraisal bias, including releasing property-level data to the public.
- CFPB: Finalize rules re banning medical debt in credit reports and language access in mortgage servicing.

The National Fair Housing Alliance

The National Fair Housing Alliance® leads the fair housing movement. NFHA™ works to eliminate housing discrimination and ensure equitable housing opportunities for all people and communities.

- Education and outreach
- Member services
- Public policy & advocacy
- Housing and community development
- Responsible AI
- Enforcement
- Consulting and compliance programs

www.nationalfairhousing.org

