Executive Orders Affecting Charitable Nonprofits



Updated April 4, 2025

New updates are highlighted in beige.

After his January 20th inauguration, President Trump signed dozens of Executive Orders (EOs) covering a broad range of issues, including diversity, equity, and inclusion programs; government grants and contracts; civic engagement; immigration; and certain nonprofit subsectors. **Some of the EOs won't take effect immediately, and many are expected to be immediately challenged in court**. This chart outlines some of the EOs that may affect nonprofits directly or indirectly.

This document will be updated frequently, so please use this link to see the most up-to-date version: https://www.councilofnonprofits.org/files/media/documents/2025/chart-executive-orders.pdf

Help us track the impacts of the recent Executive Orders on the nonprofit sector by sharing your stories of observed impacts on your work and the people you serve: <u>https://www.councilofnonprofits.org/form/effects-executive-actions-nonprofits</u>

Background Resources

- National Webinar: Executive Actions and their Impact on Charitable Nonprofits (57:38) recording and slides, National Council of Nonprofits, Feb. 7, 2025
- The Impacts of the Recent Executive Orders on Nonprofits, National Council of Nonprofits.
- **Presidential Actions**, White House.
- What Is an Executive Order?, American Bar Association, Jan. 25, 2021.

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The content provided in this chart is provided in good faith for informational purposes only and is neither intended to be nor should be construed as legal or tax advice. Please consult an attorney for the latest and most accurate information. The National Council of Nonprofits makes no representations or warranties as to the accuracy or timeliness of the information contained herein.

Diversity, Equity, and Inclusion (DEI)

Nonprofit Impact

Federal government DEI programs and trainings, often provided by or in partnership with nonprofits, will be eliminated. In addition, President Trump has signed EOs extending "anti-DEI" efforts to the private sector.

Executive Order	Implications	Status	Related Documents
Ending Illegal Discrimination and Restoring Merit-Based Opportunity	Requires every federal grant or contract to certify it is compliant with "anti-discrimination" laws and does not operate any programs promoting DEI that violate "anti-discrimination" laws. Directs the Office of Management and Budget (OMB) to review all processes, directives, and guidance, and remove all references to DEIA "under whatever name they appear" and terminate all mandates, requirements, programs, and activities. Requires a report by the Attorney General and each agency to identify up to 9 potential investigations of corporations, large nonprofits or associations, or foundations with assets of \$500 million or more or state and local bar and medical associations and higher education institutions with endowments of \$1 billion or more. Requires guidance for all education agencies and higher education institutions that receive federal funds or federal student loan assistance. Rescinds <u>EO 11246</u> which required government contracts to include antidiscrimination provisions and affirmative action requirements.	 Partially Challenged by: <u>NADOHE v.</u> <u>Trump.</u> Lawsuit Summary: Seeking to block EOs prohibiting federal grant and contract recipients from engaging in DEI initiatives. Status: In Effect, litigation ongoing. <u>Preliminary Injunction</u> <u>Appellate Court overruling the PI</u> 	

Diversity, Equity, and Inclusion (DEI)

Executive Order	Implications	Status	Related Documents
Ending Radical and Wasteful Government DEI Programs and Preferencing	Directs the Office of Management and Budget (OMB) and the Office of Personnel Management (OPM) to coordinate with all federal agencies to terminate all DEI programs in federal agencies, including equity related grants, and equity action plans	 Challenged by: <u>NCN v. OMB</u>, <u>NY v. Trump</u> (23 state attorneys general) Status: OMB Memo rescinded, blocked Lawsuit Summary: Seeking to block the OMB Memo freezing federal funds. NCN Administrative Stay. NCN Temporary Restraining Order NCN Opinion NY Temporary Restraining Order NY Preliminary Injunction Partially Challenged: <u>NADOHE v. Trump</u> Status: In effect, litigation ongoing. Lawsuit Summary: Seeking to block EOs prohibiting federal grant and contract recipients from engaging in DEI initiatives. Preliminary Injunction Appellate Court overruling the PI Challenged: <u>Chicago Women in Trades v. Trump</u> Status: Blocked Lawsuit Summary: Challenging making diversity, equity, and inclusion illegal. CWT Temporary Restraining Order 	 OMB Funding Freeze Memo OMB Funding Freeze Rescission NCN Statement • OPM DEIA Guidance DOJ DEI/DEIA Memo EEOC What to Do DEI Guidance EEOC What to Know DEI Guidance

Diversity, Equity, and Inclusion (DEI)

Executive Order	Implications	Status	Related Documents
Implementing the President's "Department of Government Efficiency" Workforce Optimization	Assigned agency leads must prepare for "large-scale reductions in force," prioritizing any initiatives, operations, or components that include diversity, equity, and inclusion or other functions "not mandated by statute or other law."	Status: In effect	
Initial Rescissions of Harmful Executive Orders and Actions	Rescinds previous Biden Executive Orders to expand DEI in in federal government programs, the federal workforce, and underserved communities.	Status: In effect	

Nonprofit Impact

Nonprofits partnering with federal government agencies or receiving federal funding, especially through government grants and contracts, may experience longer wait times and slower processing, loss of points of contacts or difficulty reaching them, and increased strain on relationships.

Nonprofits should advocate for and talk to government partners about government grants and contracting reform and provide specific examples of how processes and reporting requirements could be streamlined.

Nonprofits will no longer have direct White House connections through the Office of Faith-Based and Neighborhood Partnerships.

Executive Order/Action	Implications	Litigation	Related Documents
Memorandum for the Heads of Executive Departments and Agencies	 States that "[i]t is the policy of the Administration to stop funding NGOs that undermine the national interest." Does not define "nongovernmental organizations (NGOs). Directs the heads of executive departments and agencies to "review all funding that agencies provide to NGOs." Requires agencies to "align future funding decisions with the interests of the United States and with the goals and priorities of my Administration, as expressed in executive actions; as otherwise determined in the judgment of the heads of agencies; and on the basis of applicable authorizing statutes, regulations, and terms." 	Status: In effect	• <u>NCN Statement</u>
Improving Education Outcomes by Empowering Parents, States, and Communities	Requires the Secretary of Education to facilitate the closure of the Department of Education.	Status: In effect	

Executive Order	Implications	Status	Related Documents
Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative	Directs the heads of federal agencies to coordinate with their DOGE Team Leads and the OMB Director to review all regulations within their jurisdiction for "consistency with law and Administration policy." Requires federal agencies identify regulation categories such as those that "implicate matters of social, political, or economic significance that are not authorized by clear statutory authority." Directs OIRA's Administrator to develop a Unified Regulator Agenda that will modify or rescind those regulations.	Status: In effect	
<u>Ensuring</u> <u>Accountability for all</u> <u>Agencies</u>	Requires all federal agencies to submit proposed and final regulations to the Executive Office for review before they are published in the Federal Register. Sets Rules of Conduct Guiding Federal Employees' Interpretation of Law and that "[t]he President and the Attorney General's opinions on questions of law are controlling on all employees in the conduct of their official duties."	Status: In effect	
<u>Radical Transparency</u> <u>About Wasteful</u> <u>Spending</u>	Requires the heads of federal agencies to make as many details as possible of "every terminated program, cancelled contract, terminated grant, or any other discontinued obligation of Federal funds" public. Federal agencies must comply with "applicable laws, regulations, and the terms and conditions of the underlying contract, grant, or other award."	Status: In effect	

Executive Order	Implications	Status	Related Documents
Restoring Accountability to Policy-Influencing Positions Within the Federal Workforce	Changes human resources policies and allows for easier termination. Creates a new category to exempt federal employees in "policy- determining, policy-making, or policy-advocating" position from accessing tools to appeal termination. Positions federal agencies can consider include those with duties such as "substantive participation and discretionary authority in agency grantmaking."	 Challenged: <u>AFGE, AFL-CIO v OPM, NTEU v.</u> <u>Trump</u> (unions), <u>Stainmak v. Trump</u> (class action) Status: Blocked Lawsuit Summary: Seeking to have probationary employees reinstated. OPM ordered to rescind memos directing agencies to fire probationary employees. <u>AFGE, AFL-CIO Preliminary Injunction</u> 	• <u>OPM</u> <u>Guidance on</u> <u>Revocation</u> <u>of EO</u>
Establishing and Implementing the President's "Department of Government Efficiency"	Establishes the Department of Government Efficiency (DOGE) to implement the DOGE Agenda, modernize federal technology and software and provide access to all unclassified agency records, software systems, and IT systems.	 Challenged: Public Citizen v. Trump, NY v. Trump, AFT v. Bessent, CREW v. DOGE, Japanese American Citizens League v. Musk, Maryland v. Ag. Status: DOGE blocked access to Treasury, DoEd and OPM blocked from sharing information, DOGE required to produce documents. Lawsuit Summary: Multiple cases challenging the creation and status of DOGE as a government agency, its access to information, circumvention of FOIA, and Reduction in Force (RIF). NY Preliminary Injunction AFT Temporary Restraining Order CREW Opinion Maryland Temporary Restraining Order 	

Executive Order	Implications	Status	Related Documents
<u>Return to In-Person</u> <u>Work</u>	Directs full-time, in person work for all federal employees.	Challenged: AFGE v. Ezell Status: In effect Lawsuit Summary: Challenging the related Deferred Resignation Program for federal workers. The judge allowed the program to proceed and the program is now closed.	• <u>OPM Memo</u> <u>Deferred</u> <u>Resignation</u>
<u>Regulatory Freeze</u> <u>Pending Review</u>	Freezes outstanding regulations pending review.	Status: In effect	
<u>Initial Rescissions of</u> <u>Harmful Executive</u> <u>Orders and Actions</u>	Removes pay transparency and equity requirements for federal workers. Rescinds previous Biden Executive Order requiring executive employees to commit to an ethics code and not accept gifts from lobbyists. Rescinds previous Biden Executive Order establishing the White House Office of Faith-Based and Neighborhood Partnerships.	Status: In effect	

Executive Order/Action	Implications	Status	Related Documents
<u>Memorandum on</u> <u>Ensuring the</u> <u>Enforcement of</u> <u>Federal Rule of Civil</u> <u>Procedure 65(c)</u>	Requires all federal agencies to request plaintiffs seeking an injunction to post a bond equal to the federal government's potential costs and damages.	Status: In effect	• <u>Fact Sheet on</u> <u>FRCP 65(c)</u>
<u>Continuing the</u> <u>Reduction of the</u> <u>Federal Bureaucracy</u>	Eliminates to the maximum extent possible the: Federal Mediation and Conciliation Service, United States Agency for Global Media, Woodrow Wilson International center for Scholars in the Smithsonian Institution, Institute of Museum and Library Services, United States Interagency Council on Homelessness, Community Development Financial Institutions Fund, and Minority Business Development Agency.	Status: In effect	
<u>Eliminating Waste and</u> <u>Saving Taxpayer</u> <u>Dollars by</u> <u>Consolidating</u> <u>Procurement</u>	Consolidates all domestic federal procurement into the General Services Administration (GSA). Requires all agencies to submit proposals for GSA to conduct domestic procurement within 60 days	Status: In effect	

Executive Order	Implications	Status	Related Documents
	Requires each agency to build a centralized technological system to record payments issued by covered contracts and grants.		
	Requires a brief, written justification for each payment to be posted publicly, as permitted by law.		
Implementing the President's	Requires a mechanism to pause and rapidly review any payment.		
<u>"Department of</u> <u>Government Efficiency"</u> <u>Cost Efficiency</u> <u>Initiative</u>	Requires review of all existing covered contracts and grants and, where appropriate, termination or modification to reduce overall spending or reallocation to promote efficiency and advance policies.	Status: In effect	
	Prioritizes review of covered contracts and grants to educational institutions and foreign entities for waste, fraud, and abuse within 30 days.		
	Requires new guidance for new contracts or modifying existing contracts.		
<u>Stopping Waste, Fraud,</u> <u>and Abuse by</u> <u>Eliminating Information</u> <u>Silos</u>	Directs Agency Heads to authorize and facilitate intra- and inter-agency sharing and consolidation of unclassified agency records. Requires Agency Heads to ensure the Federal Government "has unfettered access to comprehensive data from all	Status: In effect	
SILOS	State programs that receive Federal funding."		

Executive Order	Implications	Status	Related Documents
<u>Hiring Freeze</u>	Implements federal hiring freeze.	Status: In effect	 OMB/OPM Hiring Freeze Guidance OPM DEIA Guidance DOJ DEI/DEIA Memo EEOC What to Do DEI Guidance EEOC What to Know DEI Guidance

Immigration

Nonprofit Impact

Nonprofits working with immigrant populations, providing legal assistance or training, or delivering humanitarian or other direct aid, may see the need for services increase, may lose funding, and could be targeted by law enforcement. Human services and social services could also be targeted.

Executive Order	Implications	Status	Related Documents
Protecting the American People Against Invasion	Directs relevant federal agencies to take action to remove undocumented immigrants from the country. Requires the Attorney General and Secretary of Homeland Security to review all federal contracts, grants, and other agreements providing funding to nongovernmental organizations supporting or providing services to "illegal aliens" for conformity, waste, fraud, abuse, and compliance with immigration laws and pauses funding. Terminates agreements determined to be in violation and initiates clawback or recoupment. Directs the creation of statewide Homeland Security Taskforces and detention centers. Requires the identification of all "unregistered illegal aliens". Directs relevant agencies to take action to block federal funding to sanctuary cities. Requires all federal agencies to ensure undocumented immigrants do not receive any public benefits.	Challenged: San Francisco v. Trump, Chelsea v. Trump, Make the Road New York v. Huffman, Amica Center for Immigrant Rights v. DOJ Status: In effect Lawsuit Summary: Challenging targeting sanctuary cities, expedited removal, and immigrants' access to counsel.	• <u>DOJ</u> <u>Sanctuary</u> <u>Jurisdiction</u> <u>Memo</u>

Immigration

Executive Order	Implications	Status	Related Documents
Realigning the United States Refugee Admissions Program	Suspends the US Refugee Admissions Program.	Challenged by: Pacito v. Trump Status: In effect Lawsuit Summary: Challenging the termination of the USRAP. Pacito Preliminary Injunction State Stop Work Order	
Protecting the Meaning and Value of American Citizenship	Challenges birthright citizenship under the 14th Amendment when the person's mother was unlawfully in the US and the father was not a US citizen or permanent resident or the mother's presence was lawful but temporary and the father was not a US citizen or permanent resident.	 Challenged by: <u>CASA v. Trump</u>, <u>Washington</u> v. Trump, <u>New Jersey v. Trump</u> Status: Blocked Lawsuit Summary: Multiple cases in several states challenging the Executive Order as unconstitutional. The Administration has appealed all three cases to the U.S. Supreme Court. <u>CASA Preliminary Injunction</u> <u>Washington Preliminary Injunction</u> <u>New Jersey Preliminary Injunction</u> 	

Immigration

Executive Order	Order Implications		Related Documents
Ending Taxpayer Subsidization of Open Borders	Directs federal departments and agencies to identify federally funded programs that "illegal aliens" can access, including cash and non-cash public benefits and ensure payments to states and localities do not subsidize or promote "illegal immigration" or "abet so- called 'sanctuary' policies." Requires enhanced eligibility verification systems to exclude any "ineligible alien." Requires the OMB and other assigned staff to identify all sources of federal funding for "illegal aliens," recommend other actions, and refer "improper receipt or use of Federal benefit" to DOJ and DHS within 30 days.	Status: In effect	
<u>Securing Our Borders</u>	Prioritizes building a physical wall, deterrent and prevention of entry, detention, removal, criminal charges, cooperation with State and local law enforcement, and obtaining operational control of the borders.	Status: In effect	

LGBTQ+

Nonprofit Impact

Charitable nonprofits serving LGBTQ+ communities, and providing gender-affirming care and other services, may experience loss of federal funding, increase in demand for services, and strained relationships with government partners.

Executive Order	Implications	Status	Related Documents
Initial Rescissions of Harmful Executive Orders and Actions	Revokes previous executive order (EO 13988) preventing and combating discrimination on the basis of gender identity or sexual orientation.	Status: In effect	
Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government	Requires the United States to recognize only two sexes, male and female. Directs the Executive Branch to enforce all sex- protective laws under the lens of two sexes. Directs government-issued identification documents to only recognize two sexes. Prohibits federal funds to be used to promote gender ideology. Requires all agencies to remove all references that promote gender ideology.	Challenged by: <u>National Urban</u> <u>League v. Trump, Rhode Island</u> <u>Latino Arts v. NEA</u> Status: In effect Lawsuit Summary: Challenging this executive order and related actions enforcement as unconstitutional. • <u>RI Order Denying</u> <u>Preliminary Injunction</u>	• <u>HHS Action</u>

Environment

Nonprofit Impact

Nonprofits receiving or expecting funding from Elective Pay (sometimes known as "Direct Pay"), Inflation Reduction Act, or other Infrastructure Investment and Jobs Act programs may have the programs and funds terminated.

Charitable nonprofits may also be contacted to comment on their experience before, during, and after natural disasters.

Executive Order	Implications	Status	Related Documents
<u>Council to Assess the</u> <u>Federal Emergency</u> <u>Management Agency</u>	Creates a Federal Emergency Management Agency (FEMA) Review Council that shall meet regularly and "solicit information and ideas from a broad range of stakeholders, includingnonprofit organizations." This Council will give the President a report on FEMA's response to natural disasters since 2020 that evaluates whether the agency can serve its functions. The first public meeting will be held 90 days from Jan. 24, 2025.	Status: In effect	• FEMA Memo of 34 Words
Achieving Efficiency Through State and Local Preparedness	Requires a National Resilience Strategy. Requires review of and recommendations on critical infrastructure policies. Requires a National Risk Register.	Status: In effect	

Environment

Executive Order	Implications	Status	Related Documents
<u>Unleashing</u> <u>American Energy</u>	Expands energy exploration on Federal lands and waters, eliminates electric vehicle (EV) mandate, terminates Green New Deal.	Challenged by: <u>Woonasquatucket</u> <u>River Watershed</u> <u>Council, NCN v. Ag</u> Status: In effect Lawsuit Summary: Challenging the freeze on funding from the Inflation Reduction Act and Infrastructure Investment and Jobs Act.	• <u>EPA's Press</u> <u>Release</u>
Initial Rescissions of Harmful Executive Orders and Actions	 Revokes previous executive order (E0 14052) to implement the Infrastructure Investment and Jobs Act. Federal agencies are directed to immediately pause the disbursement of funds appropriated through the Inflation Reduction Act of 2022 (Public Law 117-169) or the Infrastructure Investment and Jobs Act (Public Law 117-58). Agencies have three months to report to the White House on whether the paused funds align with the President's stated policy objectives. If the funds do not align, funds will not be distributed. 	Status: In effect	



Nonprofit Impact

Lays the groundwork for legislation and other actions to exclude noncitizens from future Censuses. The National Council of Nonprofits submitted an <u>amicus brief</u> when this issue was heard by the U.S. Supreme Court for the 2020 Census.

Executive Order	Implications	Status	Related Documents
<u>Initial Rescissions of</u> <u>Harmful Executive</u> <u>Orders and Actions</u>	Rescinds previous Biden Executive Order that required all persons, regardless of citizenship or immigration status, to be counted in the Census. Rescinds previous Biden Executive Order directing federal agencies to provide access to voter information.	Status: In effect	 <u>Termination of</u> <u>Census</u> <u>Committees</u>

Civic Engagement

Nonprofit Impact

Restricts voting access and nonprofit advocacy rights.

Executive Order	Implications	Status	Related Documents
Preserving and Protecting the Integrity of American Elections	 Requires the mail voter registration form to require proof of citizenship. Requires recording of the type of document an applicant uses as proof of citizenship. Requires identification of "unqualified voters registered in the States". Requires information on foreign nationals who have registered or have voted. Requires assessment of citizenship prior to providing voter registration forms for public assistance programs. Prioritizes enforcement against noncitizens registering to vote. Removes federal funds to states that do not comply. Changes voting standards, guidelines, administration, and electronic systems. Conditions funding for the states on "uniform and nondiscriminatory standards…that define what constitutes a vote and what will be counted as a vote." Prioritizes enforcement against foreign nationals from contributing or donating in elections. Prioritizes enforcement against lobbying by organizations or entities that have received federal funds. 	Challenged by: League of Women Voters Education Fund v. Trump (consolidated case) Status: In effect Lawsuit Summary: Challenges the executive order as unconstitutional and in violation of federal statutes.	

House of Worship/Faith-Based Groups

Nonprofit Impact

Houses of worship and faith-based groups and community organizations may be now eligible to receive or access federal grants, contracts, programs, and other federal funding opportunities.

Executive Order	Implications	Status	Related Documents
Establishment of the White House Faith Office	Establishes the White House Faith Office to "empower faith-based entities, community organizations, and houses of worship to serve families and communities." Replaces the former White House Office of Faith-Based and Community Initiatives. Charges the White House Faith Office to make recommendations; convene meetings; advise on the implementation of policy; showcase innovative initiatives; coordinate and support on training and education; consult on volunteerism, charitable giving, and payroll deductions; identify and promote grant opportunities; identify concerns; and make proposals to reduce burdens on the free exercise of religion. Clarifies that the "executive branch wants faith-based entities, community organizations, and houses of worship, to the fullest extent permitted by law, to compete on a level playing field for grants, contracts, programs, and other Federal funding opportunities."	Status: In effect	

Other

Nonprofit Impact

Nonprofits working on specific issues and from various subsectors seen as and providing information contrary to the Administration may be targeted.

Arts and culture nonprofits, museums, and libraries will no longer be "integrated into strategies, policies, and programs that advance the economic development, well-being, and resilience of all communities", among other things, by the Trump Administration.

Nonprofits that provide foreign assistance may be targeted.

Executive Order	Implications	Status	Related Documents
<u>Restoring Freedom of</u> <u>Speech and Ending</u> <u>Federal Censorship</u>	Claims combatting "misinformation," "disinformation," and "malinformation" are infringements on First Amendment freedom of speech.	Status: In effect	
<u>Reevaluating and</u> <u>Realigning United</u> <u>States Foreign Aid</u>	Requires foreign assistance to be disbursed in a manner aligned with the foreign policy of the President and places a 90-day pause on foreign development assistance.	 Challenged: <u>State v. AIDS Vaccine</u> <u>Advocacy Coalition</u> Status: Blocked, payments are to resume. Lawsuit Summary: Seeking to require the State Department and USAID to resume foreign aid payments. 	
Initial Rescissions of Harmful Executive Orders and Actions	Rescinds previous Order promoting the arts, humanities, and museum and library services.	Status: In effect	

Other

Executive Order	Implications	Status	Related Documents
<u>Restoring Public</u> <u>Service Loan</u> <u>Forgiveness</u>	Directs the Dep. of Ed to propose changes to the <u>Public Service Loan Forgiveness</u> (PSLF) program to exclude certain nonprofit organizations "whose activities have a substantial illegal purpose," including "terrorism", "child abuse," "illegal discrimination," or "disorderly conduct."	Status: In effect	