

Executive Orders Affecting Charitable Nonprofits



Updated February 10, 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:

<https://www.councilofnonprofits.org/form/effects-executive-actions-nonprofits>

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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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	Related Actions
<p><u>Ending Illegal Discrimination and Restoring Merit-Based Opportunity</u></p> <ul style="list-style-type: none">• 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 agencies and the Attorney General to take appropriate action to advance “anti-DEI” in the private sector.• Requires the Attorney General and agencies to provide recommendations for enforcing “anti-DEI” and end DEI in the private sector.	<p>After signing the EO, the federal agency in charge of personnel (US Office of Personnel Management, or OPM) sent guidance to all federal agencies instructing them to begin the process of shutting down any DEI-related programs.</p> <p>OPM also instructed all federal agencies, by 5pm on 1/22 to:</p> <ul style="list-style-type: none">• Put any federal staff working on DEI-related programs to be put on administrative leave.• Remove all outward facing media (websites, social media, etc) of DEI offices or initiatives.• Terminate any DEI-related contractors.

Diversity, Equity, and Inclusion (DEI)

Executive Order	Related Actions
<p><u>Ending Illegal Discrimination and Restoring Merit-Based Opportunity</u></p> <ul style="list-style-type: none">• 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.	<p>On 1/27 OMB issued a memo that called for the pause of all federal funding beginning 1/28 at 5pm Eastern. The National Council of Nonprofits, American Public Health Association, Main Street Alliance, and SAGE filed for a <u>temporary restraining order to stop the memo</u> from going into effect.</p> <p>On 2/3, a DC federal judge <u>issued a temporary restraining order</u>, extending a previous <u>administrative stay</u> from 1/31.</p> <p>On 1/29 OMB rescinded the memo. (<u>OMB Memo Rescinding M-25-13 01-29-2025</u>)</p> <p>In a <u>separate suit</u> by 22 state Attorneys General, a second federal judge <u>issued a temporary restraining order</u> on 1/31.</p> <p>On 2/5 – OPM issued a memo requiring the DOJ Civil Rights Division to “investigate, eliminate, and penalize illegal DEI and DEIA preferences, mandates, policies, programs, and activities in the private sector and in educational institutions that receive federal funds.” (<u>DOJ Memo – Ending Illegal DEI and DEIA Discrimination and Preferences</u>)</p>

Diversity, Equity, and Inclusion (DEI)

Executive Order	Related Actions
<p><u>Initial Rescissions of Harmful Executive Orders and Actions</u></p> <ul style="list-style-type: none">• Rescinds previous Biden Executive Orders to expand DEI in in <u>federal government programs</u>, the <u>federal workforce</u>, and <u>underserved communities</u>.	<p>OPM requests that any federal employee report any “change of contract description or personnel description since November 5, 2024 to obscure the connection between the contract and DEIA or similar ideologies. (<u>OPM Memo Initial Guidance Regarding DEIA Orders</u>)</p>
<p><u>Ending Radical and Wasteful Government DEI Programs and Preferencing</u></p> <ul style="list-style-type: none">• 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.	<p>On 2/5 – OPM issued a memo instructing federal agencies to eliminate DEIA offices, policies, programs, and practices. They are to “retain the minimum number of employees necessary to ensure agency compliance with applicable disability and accessibility laws.” (<u>OPM Memo – Further Guidance Regarding Ending DEIA Offices, Programs and Initiatives</u>)</p>

Federal Government

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	Related Actions
<p>Memorandum for the Heads of Executive Departments and Agencies</p> <ul style="list-style-type: none">• 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.”	<p>NCN Statement on 2/7</p>
<p>Regulatory Freeze Pending Review</p> <ul style="list-style-type: none">• Freezes outstanding regulations pending review.	

Federal Government

Executive Order	Related Actions
<p>Return to In-Person Work</p> <ul style="list-style-type: none">• Directs full-time, in person work for all federal employees.	<p>OPM instructed all federal agencies by 5pm 1/24 to revise telework policies to require eligible employees to work full time in person. (OPM Return to Office Guidance Memorandum 1-22-25)</p> <p>Federal agencies are instructed to prepare to implement and submit their plans to OMB and OPM for review and approval by 5pm 2/7. (OMB-OPM Return to Office Implementation)</p> <p>Federal employees have until 2/6 to share whether they will stay in their current role or resign under a deferred resignation program. Those who resign can work through 9/30 or earlier. (OPM Memo Regarding Deferred Resignation Program 01-28-2025)</p>
<p>Initial Rescissions of Harmful Executive Orders and Actions</p> <ul style="list-style-type: none">• 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.	
<p>Hiring Freeze</p> <ul style="list-style-type: none">• Implements federal hiring freeze.	<p>OPM instructed all federal departments and agencies that no vacant positions existing at 11:59 A.M. on January 20, 2025 may be filled and no new positions may be created, except in limited circumstances. Some exemptions are provided. (OMB-OPM Hiring Freeze 01 20 205 1201pm)</p>

Federal Government

Executive Order	Related Actions
<p><u>Regulatory Freeze Pending Review</u></p> <ul style="list-style-type: none">Freezes outstanding regulations pending review.	
<p><u>Restoring Accountability to Policy-Influencing Positions Within the Federal Workforce</u></p> <ul style="list-style-type: none">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.”	<p>OPM instructed federal agencies to designate and submit a point of contact by 1/29, and agencies have until 4/20 to submit interim recommendations. (<u>OPM Memorandum Policy Career Guidance 01-27-2025</u>)</p> <p>The National Treasury Employees Union filed a <u>lawsuit</u> 1/20.</p>
<p><u>Establishing and Implementing the President’s “Department of Government Efficiency”</u></p> <ul style="list-style-type: none">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.	<p>DOGE is staffed and has offices in the White House. Each federal agency is charged with creating a DOGE of at least 4 staff.</p> <p>Three federal lawsuits have been filed to challenge this EO. A fourth lawsuit seeks all records from OMB related to DOGE.</p>

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	Related Actions
<p><u>Protecting the American People Against Invasion</u></p> <ul style="list-style-type: none">• 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.	<p>On 2/5 – DOJ issued a memo requiring all departments to “identify all contracts, grants, or other agreements with organizations that support or provide services to removable or illegal aliens.” The memo also states that sanctuary jurisdictions should not receive access to federal grants administered by DOJ.</p> <p><u>(DOJ Memo - Sanctuary Jurisdiction Directives)</u></p>

Immigration

Executive Order	Related Actions
<p><u>Protecting the Meaning and Value of American Citizenship</u></p> <ul style="list-style-type: none">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.	<p>Three federal judges in <u>Maryland</u>, <u>New Hampshire</u>, and <u>Washington State</u> have issued preliminary injunctions to stop this EO from going into effect while litigation is ongoing. The cases are expected to be appealed. Three other federal lawsuits, including one filed by 18 state Attorneys General, have also been filed.</p>

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	Related Actions
<p><u>Initial Rescissions of Harmful Executive Orders and Actions</u></p> <ul style="list-style-type: none"> • Revokes previous executive order (EO 13988) preventing and combating discrimination on the basis of gender identity or sexual orientation. 	
<p><u>Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government</u></p> <ul style="list-style-type: none"> • 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. 	<p>Federal agencies have been directed to remove all statements, policies, regulations, forms, communications, or other internal and external messages related to LGBTQ+ equity or work with LGBTQ+ people and communities.</p> <p>Agencies have been directed to change any forms that require an individual's sex to list only male or female. They are prohibited from requesting gender identity.</p> <p>Agencies have been directed to rescind any guidance related to LGBTQ+ equity, and to terminate any contracts related to LGBTQ+ equity.</p>

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	Related Actions
<p><u>Council to Assess the Federal Emergency Management Agency</u></p> <ul style="list-style-type: none"> Creates a Federal Emergency Management Agency (FEMA) Review Council that shall meet regularly and “solicit information and ideas from a broad range of stakeholders, including... nonprofit 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. 	
<p><u>Initial Rescissions of Harmful Executive Orders and Actions</u></p> <ul style="list-style-type: none"> Revokes previous executive order (<u>EO 14052</u>) to implement the Infrastructure Investment and Jobs Act. 	<p>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).</p> <p>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.</p> <p>This will be challenged in court.</p>

Environment

Executive Order	Related Actions
<p><u>Unleashing American Energy</u></p> <ul style="list-style-type: none">• Expands energy exploration on Federal lands and waters, eliminates electric vehicle (EV) mandate, terminates Green New Deal.	

Census

Nonprofit Impact

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

Executive Order	Related Actions
<p>Initial Rescissions of Harmful Executive Orders and Actions</p> <ul style="list-style-type: none">• 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.	

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	Related Actions
<p data-bbox="118 527 764 558">Establishment of the White House Faith Office</p> <ul data-bbox="136 569 850 1608" style="list-style-type: none"><li data-bbox="136 569 781 730">• Establishes the White House Faith Office to “empower faith-based entities, community organizations, and houses of worship to serve families and communities.”<li data-bbox="136 789 813 863">• Replaces the former White House Office of Faith-Based and Community Initiatives.<li data-bbox="136 921 850 1297">• 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.<li data-bbox="136 1356 829 1608">• 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.”	

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	Related Actions
<p><u>Restoring Freedom of Speech and Ending Federal Censorship</u></p> <ul style="list-style-type: none">• Claims combatting “misinformation,” “disinformation,” and “malinformation” are infringements on First Amendment freedom of speech.	
<p><u>Reevaluating and Realigning United States Foreign Aid</u></p> <ul style="list-style-type: none">• 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.	<p>The State Department paused all U.S. foreign assistance funded by or through the State Department and USAID. (<u>Department of State Press Statement</u>, Jan. 26, 2025)</p>
<p><u>Initial Rescissions of Harmful Executive Orders and Actions</u></p> <ul style="list-style-type: none">• Rescinds previous Order promoting the arts, humanities, and museum and library services.	