

BROOKINGS

COMMENTARY

FAQs: Checking in on the Department of Education

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- The U.S. Department of Education has been damaged and diminished over the last year, but it remains standing and cannot be closed without an act of Congress.
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- In some ways, the Department is more active than ever, with a heavy-handed approach to dealing with school districts, colleges, and states.
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- The Trump administration has been especially willing to weaponize the Office for Civil Rights in pursuit of its agenda.
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Editor's note: This is part of the "[Why we have and need a US Department of Education \(https://www.brookings.edu/collection/why-we-have-and-need-a-us-department-of-education/\)](https://www.brookings.edu/collection/why-we-have-and-need-a-us-department-of-education/)" series, which seeks to examine the role of the U.S. Department of Education at a time when the president of the United States has called for the Department's demise. It considers what the Department does to shape education policy and practice in the United States. It also addresses misconceptions about the Department's role and the president's authority to dismantle it.

In February 2025, we published [an FAQ piece \(https://www.brookings.edu/articles/faqs-the-us-department-of-education-and-the-trump-administration/\)](https://www.brookings.edu/articles/faqs-the-us-department-of-education-and-the-trump-administration/) on the U.S. Department of Education (ED).

It addressed questions we had been hearing about what the Trump administration might do in K-12 and higher education. Now, one year later, we check in on the Department—what has happened and what might lie ahead.

Has the Trump administration eliminated the U.S. Department of Education?

No, the Trump administration has not shut down the Department of Education. ED continues to serve many of the same purposes it served [prior to this administration \(https://www.brookings.edu/articles/what-does-the-us-department-of-education-do/\)](https://www.brookings.edu/articles/what-does-the-us-department-of-education-do/). For example, it still manages the federal student loan and financial aid system, oversees federal education laws and programs, and serves other [legislatively defined purposes \(https://www.ed.gov/about/ed-overview/an-overview-of-the-us-department-of-education--pg-1\)](https://www.ed.gov/about/ed-overview/an-overview-of-the-us-department-of-education--pg-1).

However, the Trump administration has moved aggressively to shrink the Department and, in some ways, its influence. This includes: [slashing ED's workforce \(https://bipartisanpolicy.org/explainer/staffing-levels-and-the-department-of-education-five-things-to-know/\)](https://bipartisanpolicy.org/explainer/staffing-levels-and-the-department-of-education-five-things-to-know/) from about 4,000 to about 2,000 full-time employees; using [interagency agreements \(IAAs\) \(https://www.ed.gov/about/news/press-release/us-department-of-education-announces-six-new-agency-partnerships-break-federal-bureaucracy\)](https://www.ed.gov/about/news/press-release/us-department-of-education-announces-six-new-agency-partnerships-break-federal-bureaucracy) to offload responsibilities to other federal agencies; eliminating certain [offices \(https://www.edweek.org/policy-politics/the-ed-dept-axed-its-office-of-ed-tech-what-that-means-for-schools/2025/03\)](https://www.edweek.org/policy-politics/the-ed-dept-axed-its-office-of-ed-tech-what-that-means-for-schools/2025/03), [programs \(https://www.insidehighered.com/news/government/politics-elections/2025/09/11/education-department-moves-end-msi-programs\)](https://www.insidehighered.com/news/government/politics-elections/2025/09/11/education-department-moves-end-msi-programs), and [contracts \(https://www.highereddive.com/news/Education-Department-DOGE-termination-of-education-research-contracts/739879/\)](https://www.highereddive.com/news/Education-Department-DOGE-termination-of-education-research-contracts/739879/); and [withholding federal funds \(https://www.edweek.org/policy-politics/in-trumps-first-year-at-least-12-billion-in-school-funding-disruptions/2026/01\)](https://www.edweek.org/policy-politics/in-trumps-first-year-at-least-12-billion-in-school-funding-disruptions/2026/01) from educational institutions. Many of these moves are being [challenged in court \(https://www.brookings.edu/articles/tracking-lawsuits-challenging-the-trump-administrations-k-12-education-agenda/\)](https://www.brookings.edu/articles/tracking-lawsuits-challenging-the-trump-administrations-k-12-education-agenda/).

It's also important to note that ED, in some ways, is currently *more* active and influential than it ever has been. For instance, while the administration has cut staff from ED's Office for Civil Rights (OCR), it has also used OCR to threaten and punish institutions in [more heavy-handed ways \(https://www.edweek.org/policy-](https://www.edweek.org/policy-)

[politics/what-100-ed-dept-investigations-say-about-trumps-agenda-for-schools/2025/05](#)) than we have seen previously from OCR.

Will (or can) the Trump administration eliminate ED?

The Trump administration talks about [“closing the Department”](#) (<https://www.whitehouse.gov/presidential-actions/2025/03/improving-education-outcomes-by-empowering-parents-states-and-communities/>)—and this being ED’s [“final mission”](#) (<https://www.ed.gov/about/news/speech/secretary-mcmahon-our-departments-final-mission>)—but they do not have a realistic political path to shutting it down lawfully. ED and its core functions were defined by the [Department of Education Organization Act of 1979](#) (<https://www.congress.gov/bill/96th-congress/senate-bill/210/text>). To shut down the Department or terminate those functions would require another act of Congress. (Education Secretary Linda McMahon [acknowledged this](#) (<https://www.edweek.org/policy-politics/linda-mcmahon-says-trump-cant-eliminate-ed-dept-without-congress/2025/02>) in her confirmation hearing.) This means the Trump administration would need to secure majority support in both the House and Senate—and stave off a Senate filibuster (i.e., get support from 60 U.S. senators). Democrats staunchly oppose the elimination of ED, and [some](#) (<https://x.com/lisamurkowski/status/1991565281706009027>) [Republicans](#) (<https://wgme.com/news/local/maine-senator-susan-collins-advocates-for-downsizing-department-of-education-not-abolishing-it-republican-president-donald-trump-doe-doge-elon-musk>) have joined them. With Republicans unlikely to add substantially to their Senate majority in the 2026 midterm elections, the chances that Congress will act to eliminate the Department entirely during Trump’s second term are slim. Of course, this does not mean they won’t try.

How has ED’s staffing changed?

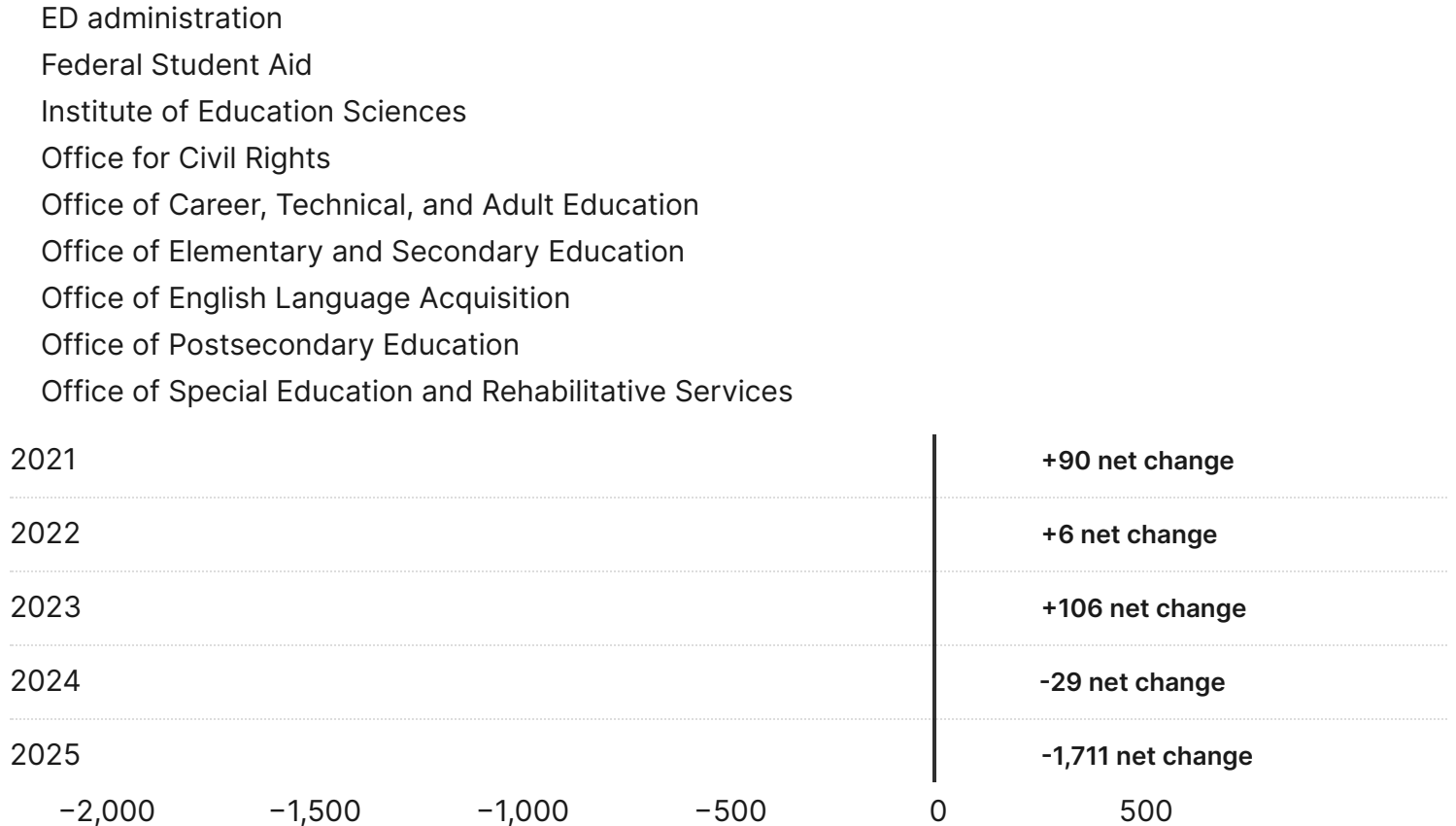
In 2025, ED’s workforce declined by about 1,700 employees, reducing the agency by almost half relative to the day Trump took office. Figure 1 shows net workforce changes each calendar year, considering both staffing departures and new hires. The

1,700 net workforce reduction in 2025 stands in stark contrast with a net reduction of 29 employees in 2024 and a net increase of 106 employees in 2023.

FIGURE 1

Department of Education faces unprecedented workforce reductions

Net workforce changes in recent years by office



Source: U.S. Office of Personnel Management (OPM) Federal Workforce Changes Over Time Data as of December 31, 2025.



Note: "Net change" is defined as the aggregate of total separations and accessions each calendar year. Subagencies with no reported separations or accessions are omitted from the data. The "ED administration" category includes: Immediate Office of the Secretary of Education, Office of Communications and Outreach, Office of Finance and Operations, Office of Inspector General, Office of Legislation and Congressional Affairs, Office of Planning, Evaluation, and Policy Development, Office of the Chief Information Officer, Office of the Duty Secretary of Education, Office of the General Counsel, and Office of the Under Secretary.

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Federal Student Aid saw the largest decline in raw numbers—a loss of 653 employees (down about 40% from [FY2024 \(https://www.ed.gov/media/document/fy-2026-congressional-justification-salaries-and-expenses-overview-110247.pdf\)](https://www.ed.gov/media/document/fy-2026-congressional-justification-salaries-and-expenses-overview-110247.pdf))

staffing levels). The Institute of Education Sciences had cuts that were smaller in number (160 employees) but larger as a share of its staffing level (nearly 75%). OCR cut 155 employees (roughly 25%).

It's worth noting that the precise number of cuts is hard to pinpoint. Federal staffing fluctuates daily—and can change suddenly in response to court decisions. Further, year-over-year staffing count comparisons may fail to capture instances where staff were on leave but reinstated within the year (e.g., as [happened at OCR \(https://www.gao.gov/assets/890/883672.pdf\)](https://www.gao.gov/assets/890/883672.pdf)). And estimates differ for [calendar \(https://data.opm.gov/explore-data/analytics/workforce-changes\)](https://data.opm.gov/explore-data/analytics/workforce-changes) and [fiscal \(https://www.ed.gov/media/document/fy-2026-congressional-justification-salaries-and-expenses-overview-110247.pdf\)](https://www.ed.gov/media/document/fy-2026-congressional-justification-salaries-and-expenses-overview-110247.pdf) years. Regardless, it's clear that ED is operating with a much leaner staff than it had before Trump took office.

What does it mean that ED has shifted responsibilities to other agencies with interagency agreements?

The Trump administration has moved the management of many programs to other federal agencies, such as the Department of Labor and the Department of Health and Human Services (HHS). It did so through a series of interagency agreements (IAAs). IAAs are contracts between agencies that define each agency's roles and responsibilities in undertaking collaborative work. (Click to read more ↓)

IAAs are not uncommon in the management of federal programs; both the Biden and Obama administrations used them (e.g., [working with the IRS \(https://www.ed.gov/media/document/aa-saadminpdf-38807.pdf#page=23\)](https://www.ed.gov/media/document/aa-saadminpdf-38807.pdf#page=23) to administer student aid programs). What distinguishes the Trump IAAs from previous agreements is the significantly larger scope—and the inclusion of programs that ED is congressionally mandated to oversee. For example, the Trump administration has sought to move oversight of the [\\$18 billion \(https://bipartisanpolicy.org/explainer/what-is-the-title-i-education-program-five-things-to-know-about-the-largest-k-12-federal-education-program-for-schools/\)](https://bipartisanpolicy.org/explainer/what-is-the-title-i-education-program-five-things-to-know-about-the-largest-k-12-federal-education-program-for-schools/) Title I program.

According to [one analysis](#)

(<https://www.nelsonmullins.com/storage/cyKxZIW1KH7IjtgoTFwb85X5ySvaM9P1bbGNUMJL.pdf>), the impacted funding makes up more than 40% of ED's annual appropriations. Table 1 below provides an overview of the affected programs.

The legality of these IAAs remains an open question. There is at least [one legal challenge](#) (<https://democracyforward.org/wp-content/uploads/2025/11/Dkt-187-Amended-Complaint-.pdf>) arguing that the scope of the IAAs exceeds the Secretary's authority.

The impact of these moves—and potential future IAAs—is another open question. It will depend on how the changes are implemented and whether affected programs continue to operate as mandated by law. [Critics](#) (https://www.appropriations.senate.gov/imo/media/doc/251203_letter_to_secretary_mcmahon_re_interagency_agreements.pdf) have expressed concern about programs being administered by agencies that do not have sufficient expertise or familiarity with these programs. To some extent, this could be mitigated if [ED's staff move to other agencies along with the programs](#) (<https://thehill.com/homenews/education/5690853-education-department-labor/>).

TABLE 1

Summary of Department of Education functions moved to other federal agencies via interagency agreements

Receiving Agency	Previous ED Office or Program	Function or Program
Department of Labor		
	<i>Office of Career, Technical, and Adult Education (OCTAE)</i>	Career and technical education programs funded by the Perkins Act
	<i>Office of Career, Technical, and Adult Education (OCTAE)</i>	Adult education and family literacy programs funded under Title II of the Workforce Innovation and Opportunity Act
	<i>Office of Elementary and Secondary Education (OESE)</i>	13 formula and 14 discretionary grant programs supporting K-12 education, including most major formula (e.g., Title I) and competitive grants authorized under the Every Student Succeeds Act
	<i>Office of Postsecondary Education (OPE) & OESE</i>	21 postsecondary programs from OPE and 2 from OESE authorized under the Higher Education Act (HEA)
Department of State		
	<i>Office of Postsecondary Education</i>	12 international and foreign language education programs funded under the HEA and the Mutual Educational and Cultural Exchange Act, including the Fulbright-Hays program
Department of the Interior		
	<i>OESE, OPE, OCTAE & Office of Special Education and Rehabilitative Services</i>	13 K-12 and postsecondary Indian education programs
Department of Health and Human Services		
	<i>Office of Postsecondary Education</i>	Child Care Access Means Parents in School Partnership grants authorized under the HEA
	<i>Office of Postsecondary Education</i>	National Committee on Foreign Medical Education and Accreditation

Source: U.S. Department of Education Press Releases and accompanying fact sheets from July 15, 2025 and November 18, 2025.

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What has the administration done to “return education to the states”?

President Trump and his administration talk frequently about the need to return education to the states. For example, Trump’s executive order that called for dismantling ED directs the Secretary to “return authority over education to the States and local communities.” States and localities have long had primary control over matters such as curriculum, staffing, and school policies, so there is a limit on how much control can be “returned.” (Click to read more ↓)

State and local policymakers across the political spectrum have, for years, objected to some ways the federal government engages in education. This includes concerns about [burdensome requirements \(https://www.gao.gov/products/gao-12-672\)](https://www.gao.gov/products/gao-12-672) for federal programs, “[unfunded \(https://www.pbs.org/newshour/education/education-july-dec05-nclb_08-23\)](https://www.pbs.org/newshour/education/education-july-dec05-nclb_08-23) mandates (<https://edsources.org/2025/idea-future-students-disabilities/741821>) ” (e.g., for IDEA), and [regulatory whiplash \(https://www.educationnext.org/fishing-for-rules-supreme-court-likely-curtail-ageinces-rulemaking-powers/\)](https://www.educationnext.org/fishing-for-rules-supreme-court-likely-curtail-ageinces-rulemaking-powers/) in the enforcement of civil rights laws. Thus far, the Trump administration has taken some actions in these areas. However, they have done little to address broader concerns about federal overreach—and, in some ways, have exerted significantly more control over education policy and practice than previous administrations, including the first Trump administration.

[A January 2025 letter \(https://www.the74million.org/wp-content/uploads/2025/02/State_Chief_Memo_1-28-25_Final_t74.pdf\)](https://www.the74million.org/wp-content/uploads/2025/02/State_Chief_Memo_1-28-25_Final_t74.pdf) from a dozen state school officers in Republican-led states illustrates how some conservatives might like to see the federal role in education change. The letter asks for deference to state leaders in the use of federal funding, an expanded use of ED’s waiver authority, and changes in how ED approaches “Dear Colleague Letters” (DCLs) and other guidance. It also asks the Secretary to work with Congress to amend the Elementary and Secondary Education Act (ESEA) to consolidate funding programs and provide states more flexibility. However, aside from [granting a modest waiver \(https://www.ed.gov/about/news/press-release/us-department-of-education-](https://www.ed.gov/about/news/press-release/us-department-of-education-)

[approves-iowas-returning-education-states-waiver](#)) that allows Iowa to consolidate four small funding streams and carry over some Title I funding across years, the Trump administration has done little to address any of these requests.

Meanwhile, ED has arguably exerted considerably *more control* over matters such as K-12 curriculum and school policies since Trump took office. Much of this comes through its different and aggressive approach to civil rights enforcement. ED issued a [DCL \(https://www.ed.gov/media/document/dear-colleague-letter-sffa-v-harvard-109506.pdf\)](https://www.ed.gov/media/document/dear-colleague-letter-sffa-v-harvard-109506.pdf) and [FAQ \(https://www.ed.gov/media/document/frequently-asked-questions-about-racial-preferences-and-stereotypes-under-title-vi-of-civil-rights-act-109530.pdf\)](https://www.ed.gov/media/document/frequently-asked-questions-about-racial-preferences-and-stereotypes-under-title-vi-of-civil-rights-act-109530.pdf) (to accompany [another executive order \(https://www.whitehouse.gov/presidential-actions/2025/01/ending-radical-indoctrination-in-k-12-schooling/\)](#)) that articulate a new interpretation of civil rights laws and regulations. It then sent [a letter to states \(https://www.ed.gov/about/news/press-release/ed-requires-k-12-school-districts-certify-compliance-title-vi-and-students-v-harvard-condition-of-receiving-federal-financial-assistance\)](#) demanding that they certify compliance with the guidance in the DCL, including the elimination of all DEI programs, within 10 days. The administration has delayed or [threatened \(https://www.ed.gov/about/news/press-release/us-department-of-education-directs-schools-end-racial-preferences\)](https://www.ed.gov/about/news/press-release/us-department-of-education-directs-schools-end-racial-preferences) to withhold federal funding over alleged noncompliance. The [courts have blocked \(https://www.brookings.edu/articles/tracking-lawsuits-challenging-the-trump-administrations-k-12-education-agenda/\)](https://www.brookings.edu/articles/tracking-lawsuits-challenging-the-trump-administrations-k-12-education-agenda/) many of the administration's attempts to withhold funding—which limits their direct impact—but these actions may still have chilling effects for states, districts, and schools hoping to avoid trouble.

How has the Trump administration withheld funding from schools and colleges?

The Trump administration has delayed or withheld significant amounts of federal funding from schools and colleges—actions that were virtually unheard of before 2025. It has impounded previously appropriated funds, canceled millions of dollars in grants for alleged “waste, fraud, and abuse,” and withheld funding for supposed civil rights violations. Some of these actions have targeted specific states or institutions that refused to comply with the administration's directives, while others have applied

more indiscriminately to entire categories of grants or funding streams. (Click to read more ↓)

It [remains the case \(https://www.brookings.edu/articles/faqs-the-us-department-of-education-and-the-trump-administration/\)](https://www.brookings.edu/articles/faqs-the-us-department-of-education-and-the-trump-administration/) that ED's authority to withhold congressionally appropriated funding is narrow and must follow the procedures established in implementing regulations. Yet, the Trump administration has looked for ways—legal or not—to put financial pressure on states, schools, and colleges. The administration has taken three basic approaches to withhold federal funding:

- **Impound previously appropriated funds and awarded grants.** The administration has canceled existing federal grants and contracts for conflicting with aspects of the administration's agenda (e.g., its anti-DEI agenda). For example, [it cancelled \\$1 billion in school mental health grants \(https://apnews.com/article/trump-mental-health-grants-dei-26e421e2150c87baf7b9e8fcac701bfa\)](https://apnews.com/article/trump-mental-health-grants-dei-26e421e2150c87baf7b9e8fcac701bfa), claiming that the grant program no longer aligned with the administration's priorities. It also temporarily impounded large categories of federal funding—most notably, more than \$6 billion in funding for an assortment of programs in July 2025 (subsequently released in response to widespread, [bipartisan \(https://www.capito.senate.gov/imo/media/doc/letter_to_director_vought.pdf\)](https://www.capito.senate.gov/imo/media/doc/letter_to_director_vought.pdf) backlash).
- **Through DOGE, cancel federal contracts for alleged “waste, fraud, and abuse.”** During the height of DOGE activity in early 2025, the federal government canceled many education contracts. The impact was most acutely felt in the Institute of Education Sciences (IES), the Department's education research arm. [There, DOGE terminated about \\$900 million in research contracts \(https://www.propublica.org/article/department-of-education-institute-education-science-contracts-doge\)](https://www.propublica.org/article/department-of-education-institute-education-science-contracts-doge), seemingly overnight. These cuts have [decimated some areas of research \(https://www.wsj.com/us-news/education/trumps-job-cuts-education-researchers-careers-f28c61c6?mod=author_content_page_1_pos_5\)](https://www.wsj.com/us-news/education/trumps-job-cuts-education-researchers-careers-f28c61c6?mod=author_content_page_1_pos_5) and [interrupted data collection and analysis \(https://www.brookings.edu/articles/cutting-research-funding-would-make-education-less-effective-and-efficient/\)](https://www.brookings.edu/articles/cutting-research-funding-would-make-education-less-effective-and-efficient/) of U.S. schools and colleges. Universities and colleges that rely on research funding have been affected by these (and other) cuts, as have school districts and other institutions that engage in federally funded research partnerships.

- **Cancel federal funding (or threaten to do so) for alleged civil rights violations.**

The administration has used its authority to withhold federal funding from institutions that it sees as misaligned with this administration's interpretation of civil rights law (over issues such as transgender rights and antisemitism). [Colleges and universities have been the primary targets \(https://www.npr.org/2026/01/29/nx-s1-5559293/trump-settlements-colleges-universities\)](https://www.npr.org/2026/01/29/nx-s1-5559293/trump-settlements-colleges-universities) of this type of enforcement, but some K-12 districts and states have also had funding withheld unexpectedly (e.g., [New York City Department of Education, Chicago Public Schools, and Fairfax County Public Schools \(https://www.nytimes.com/2025/09/25/nyregion/trump-dei-schools-federal-money.html\)](https://www.nytimes.com/2025/09/25/nyregion/trump-dei-schools-federal-money.html)). Institutions have challenged the administration's moves in court—with [some receiving \(https://apnews.com/article/harvard-trump-federal-funding-bdde8f529f01b96d5521d0e248e8fc6c\)](https://apnews.com/article/harvard-trump-federal-funding-bdde8f529f01b96d5521d0e248e8fc6c) favorable rulings (<https://www.npr.org/2025/11/15/nx-s1-5609876/uc-university-california-discrimination-fine-ruling>) .

How has the Trump/McMahon education agenda affected colleges?

This has been a turbulent, uncertain time for America's colleges and universities. They have been impacted by the administration's funding cuts and withholdings, new visa policies that threaten international student enrollment and tuition revenue streams, and a combination of threats and policies that have silenced faculty, staff, and students. (Click to read more ↓)

The administration has delayed or withheld funds from institutions to force compliance with their directives related to DEI, LGBTQ+ rights, and antisemitism. Through OCR and the Federal Taskforce to Combat Anti-Semitism, the administration has accused colleges of civil rights violations and [withheld \(https://www.hhs.gov/press-room/task-force-cancels-columbia-university-grants.html\)](https://www.hhs.gov/press-room/task-force-cancels-columbia-university-grants.html) federal research funding. Courts have blocked many of these actions, and some universities have entered [voluntary \(https://president.columbia.edu/sites/president.columbia.edu/files/content/July%202025%20Announcement/Columbia%20University%20Resolution%20Agreement.pdf\)](https://president.columbia.edu/sites/president.columbia.edu/files/content/July%202025%20Announcement/Columbia%20University%20Resolution%20Agreement.pdf) settlements (https://www.brown.edu/sites/default/files/brown-and-united-states-resolution-agreement_July-30-2025.pdf) and changed their policies to restore funds. Not all colleges have reached a settlement; [Harvard](#)

[\(https://www.thecrimson.com/article/2026/2/3/trump-harvard-1-billion-claim/\)](https://www.thecrimson.com/article/2026/2/3/trump-harvard-1-billion-claim/) and [UCLA \(https://www.pbs.org/newshour/politics/trump-administration-seeks-1b-settlement-from-ucla-white-house-official-says\)](https://www.pbs.org/newshour/politics/trump-administration-seeks-1b-settlement-from-ucla-white-house-official-says) have been asked to pay the government over \$1 billion, but those conversations are ongoing and the administration's actions are under [legal](https://www.thecrimson.com/article/2025/9/4/harvard-funding-order/#:~:text=On%20September%204%2C%202025%2C%20United%20States%20District,VI%20of%20the%201964%20Civil%20Rights%20Act) [review.](https://www.thecrimson.com/article/2025/9/4/harvard-funding-order/#:~:text=On%20September%204%2C%202025%2C%20United%20States%20District,VI%20of%20the%201964%20Civil%20Rights%20Act) [\(https://calmatters.org/education/higher-education/2025/11/uc/#:~:text=The%20settlement%20demand%20emerged%20a,frozen%20funds%20back%20to%20UCLA.\)](https://calmatters.org/education/higher-education/2025/11/uc/#:~:text=The%20settlement%20demand%20emerged%20a,frozen%20funds%20back%20to%20UCLA.)

The administration asked nine colleges to sign onto a [Compact for Academic Excellence in Higher Education](https://www.insidehighered.com/sites/default/files/2025-10/Compact%20for%20Academic%20Excellence%20in%20Higher%20Education%2010.1%5B97%5D%5B39%5D_0.pdf) [\(https://www.insidehighered.com/sites/default/files/2025-10/Compact%20for%20Academic%20Excellence%20in%20Higher%20Education%2010.1%5B97%5D%5B39%5D_0.pdf\)](https://www.insidehighered.com/sites/default/files/2025-10/Compact%20for%20Academic%20Excellence%20in%20Higher%20Education%2010.1%5B97%5D%5B39%5D_0.pdf) that threatened the future of “federal benefits” (including student loans, student visa approvals, and tax benefits) for institutions that do not adopt the administration’s “models and values.” The prescribed actions include freezing tuition, limiting international undergraduate enrollment, banning the consideration of most student characteristics in admissions (including race, sex, gender, and nationality), and advancing institutional neutrality. While most colleges declined to sign on, [Secretary McMahon indicated](https://www.forbes.com/sites/michaelnietzel/2026/01/22/another-version-of-trumps-higher-ed-compact-reportedly-in-the-works/) [\(https://www.forbes.com/sites/michaelnietzel/2026/01/22/another-version-of-trumps-higher-ed-compact-reportedly-in-the-works/\)](https://www.forbes.com/sites/michaelnietzel/2026/01/22/another-version-of-trumps-higher-ed-compact-reportedly-in-the-works/) the administration is revising the compact and [expects to release a second version](https://www.nytimes.com/2026/01/21/us/politics/trump-higher-education-2025.html) [\(https://www.nytimes.com/2026/01/21/us/politics/trump-higher-education-2025.html\)](https://www.nytimes.com/2026/01/21/us/politics/trump-higher-education-2025.html)

Widespread grant and contract cancelations by DOGE also affected university operations and financial stability. In response, [ongoing research was suspended](https://apnews.com/article/harvard-trump-nih-funding-cuts-32c1ae9dc542897496974a85aaa07b85) [\(https://apnews.com/article/harvard-trump-nih-funding-cuts-32c1ae9dc542897496974a85aaa07b85\)](https://apnews.com/article/harvard-trump-nih-funding-cuts-32c1ae9dc542897496974a85aaa07b85), [positions were cut,](https://president.msu.edu/communications/2025/10/2025-10-22-financial-update) [\(https://president.msu.edu/communications/2025/10/2025-10-22-financial-update\)](https://president.msu.edu/communications/2025/10/2025-10-22-financial-update) and [PhD admissions were paused](https://www.forbes.com/sites/michaelnietzel/2026/01/29/hard-times-have-come-for-the-phd-degree/) [\(https://www.forbes.com/sites/michaelnietzel/2026/01/29/hard-times-have-come-for-the-phd-degree/\)](https://www.forbes.com/sites/michaelnietzel/2026/01/29/hard-times-have-come-for-the-phd-degree/). While Congress [rejected](https://fedscoop.com/house-senate-) [\(https://fedscoop.com/house-senate-](https://fedscoop.com/house-senate-)

[lawmakers-ignore-requested-trump-cuts-science-agencies/](#)) most of the administration's [proposed cuts to research funding](#) (<https://www.nature.com/articles/d41586-025-01397-1>) in the FY2026 budget, NSF and NIH each [awarded about 25% fewer grants in 2025](#) (<https://www.nature.com/immersive/d41586-026-00088-9/index.html>) than they had over the past decade.

Finally, it remains to be seen what impact the administration's broadly antagonistic approach to higher education will have on public confidence in the sector, college enrollment, and institutions' financial stability.

How has the Trump administration changed OCR?

On one hand, OCR has been gutted by staffing cuts and pulled away from its most fundamental responsibilities. On the other hand, this administration's muscular approach to civil rights enforcement has turned OCR into a forceful tool to coerce institutions to align with the administration's positions on certain culture-war issues. (Click to read more ↓)

OCR was hit hard by the reduction-in-force (RIF) [announcements](#) (<https://www.gao.gov/products/gao-26-108320>) in March 2025, losing more than half of its staff and closing 7 of its 12 regional offices. Nearly all its usual work to investigate and resolve civil rights complaints—e.g., for students with disabilities—was [deprioritized](#) (<https://www.npr.org/2025/12/10/nx-s1-5637464/education-department-layoffs-civil-rights>) or ignored for months on end. In December 2025, ED [called back some OCR staff](#) (<https://www.the74million.org/article/to-ease-civil-rights-backlog-mcmahon-orders-back-staff-she-tried-to-fire/>) who had received RIF notices; in January 2026, it [rescinded the RIF for all OCR staff members](#) (<https://www.gao.gov/products/gao-26-108320>). Still, it remains unclear how many staff returned to work, whether OCR is equipped to work through the accumulated backlog of complaints, and to what extent this administration will prioritize that work.

What has been clear is the administration's willingness to leverage the agency's authority to withhold federal funding from institutions. It has repeatedly withheld funds

from institutions—an [unusual \(https://www.edweek.org/policy-politics/will-trump-follow-through-on-his-threats-to-cut-school-funding/2025/02#:~:text=The%20department's%20move%20to%20cut,we%20did%2C%E2%80%9D%20he%20said.\)](https://www.edweek.org/policy-politics/will-trump-follow-through-on-his-threats-to-cut-school-funding/2025/02#:~:text=The%20department's%20move%20to%20cut,we%20did%2C%E2%80%9D%20he%20said.) move from OCR—[without \(https://www.washingtonpost.com/education/2025/07/18/antisemitism-task-force-dei-universities-trump/\)](https://www.washingtonpost.com/education/2025/07/18/antisemitism-task-force-dei-universities-trump/) conducting a substantive investigation or following the required procedures for withholding funds. And it has adopted narrow, and legally questionable, views of what constitutes a civil rights violation. For example, institutions—and even [entire \(https://mainemorningstar.com/2025/08/21/maine-schools-still-receiving-federal-funds-despite-trumps-threats-over-transgender-policy/\)](https://mainemorningstar.com/2025/08/21/maine-schools-still-receiving-federal-funds-despite-trumps-threats-over-transgender-policy/) [states \(https://www.nbcnews.com/nbc-out/out-politics-and-policy/trump-threatens-funding-california-schools-transgender-policies-rcna226265\)](https://www.nbcnews.com/nbc-out/out-politics-and-policy/trump-threatens-funding-california-schools-transgender-policies-rcna226265)—are being accused of Title IX violations for having programs and policies that create opportunities for transgender students (as opposed to more traditional Title IX cases of sexual harassment and assault). To enforce Title VI of the Civil Rights Act, it has focused on alleged cases of [“reverse discrimination” \(https://www.cbsnews.com/news/justice-department-reverse-discrimination-civil-rights-division/\)](https://www.cbsnews.com/news/justice-department-reverse-discrimination-civil-rights-division/) against White students.

How has special education been affected by Trump-era changes?

Thus far, the most significant disruptions to special education have come from gaps in the enforcement of federal laws that provide rights and resources to students with disabilities. In typical years, [most of OCR's K-12 enforcement work is focused on disability rights \(https://journals.sagepub.com/doi/full/10.3102/0013189X221130056\)](https://journals.sagepub.com/doi/full/10.3102/0013189X221130056). In 2025, [families of students with disabilities \(https://www.vpm.org/npr-news/npr-news/2025-04-16/families-say-school-civil-rights-investigations-have-stalled-after-federal-cuts\)](https://www.vpm.org/npr-news/npr-news/2025-04-16/families-say-school-civil-rights-investigations-have-stalled-after-federal-cuts) sounded alarms about OCR's diminished capacity and shifting priorities. However, some of that work [has resumed \(https://www.the74million.org/article/to-ease-civil-rights-backlog-mcmahon-orders-back-staff-she-tried-to-fire/\)](https://www.the74million.org/article/to-ease-civil-rights-backlog-mcmahon-orders-back-staff-she-tried-to-fire/) since Kimberly Richey took office in OCR (in November) and since ED called back OCR staff to work through the significant case backlog that had accumulated.

To date, federal funding for special education has not been substantially reduced or increased relative to the previous levels (though [some individual grants under IDEA have been canceled \(https://www.edweek.org/policy-politics/in-trumps-first-year-at-least-12-billion-in-school-funding-disruptions/2026/01\)](https://www.edweek.org/policy-politics/in-trumps-first-year-at-least-12-billion-in-school-funding-disruptions/2026/01)). And the Office of Special Education Programs—which oversees federal special education programs and funding—remains housed in ED, [though department officials have confirmed \(https://www.politico.com/news/2025/11/29/advocates-push-for-education-department-to-keep-programs-for-children-with-disabilities-00669701\)](https://www.politico.com/news/2025/11/29/advocates-push-for-education-department-to-keep-programs-for-children-with-disabilities-00669701) ongoing discussions about moving it elsewhere.

How has Congress responded to the administration?

Congress has not shown much interest in eliminating ED or reducing funding for existing education programs. The recently passed FY2026 appropriations bill rejected most of the administration’s proposed cuts, and the passage of the One Big Beautiful Bill Act (OBBBA) envisions a robust Department of Education to implement higher education initiatives. (Click to read more ↓)

On the appropriations side, [Congress rejected funding cuts \(https://www.newsfromthestates.com/article/setback-trump-congress-spending-law-rejects-call-axe-education-department\)](https://www.newsfromthestates.com/article/setback-trump-congress-spending-law-rejects-call-axe-education-department) proposed by the Trump administration, funding most programs at flat levels relative to FY2025. For example, while the administration wanted to [cut the federal Pell grant for low-income students by 23% \(https://www.brookings.edu/articles/pell-grant-cuts-threaten-state-college-access-goals/\)](https://www.brookings.edu/articles/pell-grant-cuts-threaten-state-college-access-goals/), the FY26 budget maintained last year’s grant levels. Congress also allocated \$790 million to IES (the administration requested \$261 million), \$140 million to OCR (the administration requested \$91 million), and \$1.588 billion for Federal TRIO and GEAR UP college success programs (the administration asked to eliminate these programs entirely). Further, [Republican lawmakers \(https://www.capito.senate.gov/imo/media/doc/letter_to_director_vought.pdf\)](https://www.capito.senate.gov/imo/media/doc/letter_to_director_vought.pdf) have expressed concern over the administration withholding or delaying the release of appropriated funds for education programs.

The largest legislative effort in 2025 was the passage of OBBBA, which included a [controversial new tax-credit scholarship program \(https://www.brookings.edu/articles/the-obbbas-tax-credit-scholarship-program-is-a-](https://www.brookings.edu/articles/the-obbbas-tax-credit-scholarship-program-is-a-)

[mess-that-might-be-worth-opting-into-anyway/](#)) and significant changes to higher education policy. Congress clearly envisioned a well-staffed Department of Education to implement changes to student loan borrowing and repayment, as well as the new Workforce Pell funding stream that requires [significant oversight on eligible programs \(https://www.ncan.org/news/717100/Highlights-from-the-AHEAD-Committee-Workforce-Pell-Consensus-Reached.htm#:~:text=ED%20is%20charged%20with%20calculating,met%2C%20which%20may%20prove%20challenging.\)](#). ED has convened several [negotiated rulemaking committees \(https://www.ed.gov/laws-and-policy/higher-education-laws-and-policy/higher-education-policy/negotiated-rulemaking-for-higher-education-2025-2026\)](#) to advance regulations needed to implement these policies. Beyond OBBBA, there has not been major legislation related to education.

How have changes at ED affected student loan borrowers?

Student loan borrowers continue to face a chaotic and confusing loan repayment system. Recent cuts to ED staffing have exacerbated this problem, making it difficult to help borrowers understand their repayment options and enroll in a suitable plan. It also remains to be seen whether ED will be able to effectively manage the substantial overhaul of the student loan program included in the One Big Beautiful Bill Act (OBBBA). (Click to read more ↓)

During the Biden administration, ED used the regulatory process to introduce a more generous [income-driven repayment \(IDR\) plan \(https://www.federalregister.gov/documents/2023/07/10/2023-13112/improving-income-driven-repayment-for-the-william-d-ford-federal-direct-loan-program-and-the-federal\)](#) known as SAVE. The plan was [challenged in court \(https://www.brookings.edu/articles/how-are-legal-challenges-to-save-affecting-the-student-loan-program/\)](#) after nearly 8 million borrowers had already enrolled. Those borrowers have been placed into forbearance while the case is litigated. In the meantime, many Public Service Loan Forgiveness (PSLF) eligible borrowers currently on SAVE cannot make qualifying payments. [This August \(https://www.ed.gov/about/news/press-release/us-department-of-education-continues-improve-federal-student-loan-repayment-options-addresses-illegal-biden-](#)

[administration-actions](#)), ED started charging interest on those loans, urging borrowers to enroll in other repayment plans and resume payments. [In a lawsuit \(https://protectborrowers.org/litigation/aft-v-u-s-department-of-education-lawsuit-complaint/\)](https://protectborrowers.org/litigation/aft-v-u-s-department-of-education-lawsuit-complaint/), the American Federation of Teachers objected to the administration's handling of IDR and PSLF. [In a settlement \(https://www.courtlistener.com/docket/69753739/54/american-federation-of-teachers-v-us-department-of-education/\)](https://www.courtlistener.com/docket/69753739/54/american-federation-of-teachers-v-us-department-of-education/), ED agreed to open additional IDR plans to new enrollment, resume processing IDR forgiveness applications, and process PSLF waiver applications. However, progress has been slow. [A proposed legal settlement \(https://www.ed.gov/media/document/missouri-settlement-112689.pdf\)](https://www.ed.gov/media/document/missouri-settlement-112689.pdf) would end SAVE, but the settlement is not final, and borrowers continue to face confusing and unclear options for repayment.

Transitioning borrowers to new plans once SAVE is eliminated will take time and staff support. Federal Student Aid (FSA), the agency that manages the student loan program, has long been considered [understaffed \(https://www.insidehighered.com/news/government/student-aid-policy/2025/05/21/financial-aid-officers-report-breakdowns-federal\)](https://www.insidehighered.com/news/government/student-aid-policy/2025/05/21/financial-aid-officers-report-breakdowns-federal) to handle the loan program. Its recent cuts raise questions about ED's ability to execute the transition effectively. Indeed, there is reason for concern about FSA's capacity. [The Department recently missed a court-imposed deadline \(https://www.forbes.com/sites/adamminsky/2026/01/30/student-loans-may-get-discharged-and-refunded-automatically-for-200000-people-as-key-deadline-passes/\)](https://www.forbes.com/sites/adamminsky/2026/01/30/student-loans-may-get-discharged-and-refunded-automatically-for-200000-people-as-key-deadline-passes/) requiring the adjudication of about 200,000 Borrower Defense to Repayment forgiveness applications and [requested an 18-month extension \(https://s3.documentcloud.org/documents/26303651/sweet-request.pdf\)](https://s3.documentcloud.org/documents/26303651/sweet-request.pdf) because FSA has "seen staffing dwindle at the time when resources for postclass adjudication are most needed." In addition, the [backlog \(https://www.forbes.com/sites/adamminsky/2025/09/15/department-of-education-posts-new-update-on-student-loan-backlogs-as-legal-threat-grows/\)](https://www.forbes.com/sites/adamminsky/2025/09/15/department-of-education-posts-new-update-on-student-loan-backlogs-as-legal-threat-grows/) of IDR applications remains large and the number of unprocessed PSLF waiver applications has grown.

The Department has twice [announced plans \(https://www.ed.gov/about/news/press-release/us-department-of-education-delays-involuntary-collections-amid-ongoing-student-loan-repayment-improvements\)](https://www.ed.gov/about/news/press-release/us-department-of-education-delays-involuntary-collections-amid-ongoing-student-loan-repayment-improvements) to restart involuntary collections on defaulted loans but subsequently backed off. Most recently, ED [indicated](#)

<https://www.ed.gov/about/news/press-release/us-department-of-education-delays-involuntary-collections-amid-ongoing-student-loan-repayment-improvements>) they wanted to give borrowers in default more time to rehabilitate their loans or enroll in new options that will become available as a result of OBBBA before withholding tax refunds. [Work is underway](#) <https://www.federalregister.gov/documents/2026/01/30/2026-01912/reimagining-and-improving-student-education>) on the implementing regulations that will overhaul the student loan program, but many borrowers remain in limbo until those regulations are finalized.

In October, the Department [adopted a rule \(https://www.ed.gov/media/document/fact-sheet-restoring-public-service-loan-forgiveness-its-statutory-purpose-october-30-2025-112456.pdf\)](https://www.ed.gov/media/document/fact-sheet-restoring-public-service-loan-forgiveness-its-statutory-purpose-october-30-2025-112456.pdf) amending the definition of “qualifying employer” for PSLF to exclude organizations that, according to the Secretary, are engaged in “substantial illegal activities.” These provisions appear targeted at governments’ and non-profit organizations’ actions related to immigration, abortion care, gender-affirming care, or DEI programs.¹ The rule, which is not scheduled to go into effect until July 2026, is the subject [of \(https://clearinghouse.net/case/47109/\)](https://clearinghouse.net/case/47109/) [multiple \(https://clearinghouse.net/case/47105/\)](https://clearinghouse.net/case/47105/) [lawsuits \(https://clearinghouse.net/case/47296/\)](https://clearinghouse.net/case/47296/), so it remains to be seen if any borrowers will be denied PSLF credit under this policy.

How durable are these changes?

While the Trump administration has made significant changes to ED, these actions have not been accompanied by legislative action, and many efforts could be reversed by a subsequent administration. That is not to imply that the Trump administration’s actions can or will be reversed immediately—nor that a future administration should try to recreate what existed before. For example, the next administration might find more strategic ways to allocate staff, and if it wishes to undo the IAAs that transfer ED’s responsibilities to other agencies, it will need to take care to avoid the very types of transition costs expected for when these programs move out of ED.

Ultimately, the Trump administration has demonstrated the potential – and limits – of executive ability to determine the federal role in education. There will be plenty of opportunities for future administrations to make marks of their own.

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Footnotes

1. As the Department's announcement puts it: "These activities include aiding and abetting violations of Federal immigration laws, supporting terrorism or engaging in violence for the purpose of obstructing or influencing Federal Government policy, engaging in the chemical and surgical castration or mutilation of children in violation of Federal or State law, engaging in the trafficking of children to States for purposes of emancipation from their lawful parents in violation of Federal or State law, engaging in a pattern of aiding and abetting illegal discrimination, and engaging in a pattern of violating State laws."

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