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EDUCATION AT RISK:

FRONTLINE IMPACTS OF TRUMP'S WAR ON STUDENTS



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I. Executive Summary

Since taking office in January 2025, the Trump Administration has carried out a series of attacks on the Department of Education (ED, or “the Department”) aimed at dismantling the agency. Through Executive Orders and other targeted actions, President Donald Trump, Elon Musk’s Department of Government Efficiency (DOGE), and ED Secretary Linda McMahon have eliminated hundreds of millions of dollars in federal funding for ED programs that millions of Americans rely on, reduced Department staffing levels by nearly 50 percent, and are attempting to transfer core ED functions to other agencies. On March 20, 2025, the Trump Administration formalized many of these efforts in an Executive Order instructing Secretary McMahon to, “to the maximum extent appropriate and permitted by law, take all necessary steps to facilitate the closure of the Department of Education.” As Secretary McMahon has worked to carry out this order, the President’s proposed budget for Fiscal Year 2026 would cut Department funding by over 15 percent. On July 4, 2025 President Trump signed his reconciliation package—the “Big Beautiful Bill”—into law, drastically cutting the federal student aid distributed by ED.

The Education Department supports millions of American students, primary and secondary school teachers, administrators, parents, and student loan borrowers. The Department’s Office of Federal Student Aid (FSA) is responsible for administering federal student loans, grants, and work-study opportunities for over 9.9 million students enrolled in higher education. ED conducts oversight of higher education institutions to protect students from being defrauded and to ensure students have access to quality higher education. The Department’s Office of Civil Rights (OCR) handles tens of thousands of complaints annually regarding civil rights violations and

discrimination in schools. The Department’s Institute of Education Sciences (IES) oversees comprehensive longitudinal statistical studies and evaluations of educational programs and policies spanning decades. And dozens of other ED offices and programs serve over 50 million students across the United States. As of the release of this report, all of these programs are under threat, and some are already severely compromised.

Senator Warren has led an effort to push back on the Trump Administration’s attacks on education. In April 2025, she launched the Save Our Schools campaign to investigate the impacts of these cuts on students, families, teachers, and schools in America. In a series of letters to the administration, she sought information on the impacts of President Trump’s dangerous policies, and successfully urged the Department of Education Acting Inspector General to open an investigation into the Trump Administration’s actions to dismantle the Department. On May 14, 2025, Senator Warren led a Senate spotlight hearing entitled “Stealing the American Dream: How Trump and Republicans Are Raising Education Costs for Families,” highlighting the consequences of cuts to federal student aid programs.

The impacts of the Trump Administration’s actions are already being felt across the country. On April 23, 2025, Senator Warren wrote to 12 leading national organizations representing students, teachers, parents, borrowers, and administrators in K-12 and higher education to collect information on the impacts of the administration’s policies. This report contains the key findings from these responses, which are as follows:

- **Cuts to Office of Federal Student Aid staff and student loan programs will limit college attendance and delay borrower access to loans and debt relief.**

FSA administers over \$120 billion in grants, work-study, and student loans annually, enabling more than 9.9 million students to attend institutions of higher education. Under the President's reconciliation package caps have been placed on the amounts that can be borrowed by graduate students and parents, and support for student loan borrowers seeking relief has been significantly cut. According to the Association for Institutional Research, "reduced support for students will decrease college attendance for first-generation and other students who don't have financial resources."

President Trump and Secretary McMahon's efforts to dismantle the Department have cut the 1,400-person FSA workforce by at least 300. Reductions in staff are already undermining the ability of the office to administer federal student aid. According to the National Parents Union, "[t]he day after a team responsible for FAFSA was laid off, the FAFSA website, crucial for college financial aid applications, temporarily went offline." The American Council on Education is concerned that lapses in service from FSA will have costly consequences for borrowers, stating "delayed funding, especially in the instances of student financial aid, can result in the inability of students to enroll for classes and persist through to completion in a timely fashion, causing them to take on more student loan debt to complete their degrees."

FSA also protects student loan borrowers from bad actors, ensuring that borrowers are not defrauded by scams and predatory lending, and helping them seek relief if they attend an institution that suddenly closed. Removing the capacity of FSA to perform this work, according to the National Education Association, "eliminate[s] the federal floor

that ensures protection for students against education profiteers who seek to profit off students rather than educate them."

- **Dismantling the Office of Civil Rights limits its ability to ensure that students receive an education free from discrimination.**

OCR, which enforces civil rights laws and helps to manage and resolve complaints of discrimination in schools, has lost at least 240 of its 568 employees and seven out of twelve of its regional offices have been closed. According to the National Parents Union, this "leaves 46.413 million students in 27 States and territories without dedicated civil rights investigators in regional offices." These staffing cuts have inundated the remaining investigators, who received over 22,000 complaints in 2024.

This drastic reduction in OCR's capacity to investigate complaints and provide remediation means that OCR is limited in its ability to oversee and enforce "the core civil rights laws that seek to ensure all students, but especially those that have been subject to a history of racial and systemic discrimination, are protected," says the American Council on Education. This includes the Department's work to protect the 7.5 million students with disabilities who are guaranteed by federal law equal access to educational opportunities.

- **Cuts to the Institute of Education Sciences threaten the collection and dissemination of critical federal data.**

IES is mandated by law to coordinate research and evaluation of federal programs and to compile and disseminate comprehensive statistics and surveys on education. It also

operates the National Center for Education Statistics (NCES).

Under President Trump’s efforts to dismantle the Department, IES has lost nearly 90 percent of its employees, and according to American Council on Education, NCES has been “reduced to a mere three employees, hindering the once robust research arm in fulfilling its duties.”

At the recommendation of Elon Musk’s DOGE, dozens of contracts involving data collection and analysis have been cancelled, delayed, or are under threat. NCES is responsible for the Integrated Postsecondary Data System, which provides the underlying data for the College Scorecard. With a severely decimated NCES, this system is under threat, and in its absence, “families would be left without the only reliable federal resource to help them make informed choices about one of the most significant financial and personal decisions of their lives,” says the Institute for Higher Education Policy.

Data collection and analysis by ED is a critical piece of the public-private partnership that keep United States institutions strong. Without these resources, it will become impossible for students and parents to get a comprehensive evaluation of the quality of colleges and secondary schools. It will also be harder for schools to evaluate themselves against peer institutions and seek meaningful and trustworthy accreditation.

- **Plans to transfer responsibilities to other agencies are wasteful and will increase the cost and complexity of performing essential Department functions.**

Although Secretary McMahon admitted to Senator Warren that she does not have the statutory authority to transfer the Department’s functions to other agencies, the administration is attempting to entirely dismantle ED and spread its remaining functions across agencies—a recipe for chaos and complexity that will open the doors to waste, fraud, and abuse.

President Trump’s proposal to move special education services into the Department of Health and Human Services risks “strip[ping] away decades of hard-won progress for students with disabilities” says the National Center for Youth Law, by “return[ing] to an outdated medical model that treats disabilities as pathologies to be contained rather than differences to be accommodated.”

The administration further plans to move FSA into the Small Business Administration (SBA), but this agency is unprepared to handle FSA’s workload. According to the Student Borrower Protection Center, “the federal student loan portfolio is nearly four times the size of the current SBA loan portfolio, and nearly 16 times larger than its historic portfolio.” Other plans to move student loans to the Department of the Treasury are equally ill-advised, since Treasury has no experience administering individual loans.

Moving OCR’s duty to investigate and remediate civil rights complaints into the Department of Justice (DOJ) would also be counterproductive. The National Women’s Law Center points out that currently, remediation with OCR “is free and does not require legal representation, which allows families and students who cannot afford a lawyer a pathway to enforce their civil rights.”

If these functions were moved under DOJ, the key procedures to carry out OCR's work would not be available, and the National Education Association points out that instead "it would have only the tool of litigation in federal court, a lengthy and resource-intensive process that would render the federal government unable to handle the thousands of civil rights complaints currently on OCR's docket."

These agencies are already capacity constrained under DOGE firings and reductions in force, raising additional concerns about the administration's plans.

The actions to dismantle the Department of Education taken by the Trump Administration, Elon Musk, DOGE, and Secretary McMahon have already negatively impacted students and families. The information compiled in this report reveals that this damage will continue to worsen if the Department is further defunded and dismantled.

II. Introduction

The Department of Education (ED or “the Department”) was established by the bipartisan *Department of Education Organization Act of 1979*, as a department “in the public interest” that would “promote the general welfare of the United States, [would] help ensure that education issues receive proper treatment at the Federal level, and [would] enable the Federal Government to coordinate its education activities more effectively.”¹ Today, Americans rely on the Department to fund a range of critical services such as financial aid to pay for college, special education, afterschool programs, and more.² The Department is also responsible for protecting students from civil rights violations, fraudulent for-profit colleges, and predatory student loan servicers.³ ED operates programs that touch every level of education: its elementary and secondary programs serve over 50 million students, 98,000 public schools, and 32,000 private schools; its postsecondary programs provide loan, grant, and work-study assistance to more than 12 million students.⁴

Since taking office in January 2025, President Trump has aggressively sought to defund, dismantle, and eliminate ED. Beginning on day one, the Trump Administration issued a series of Executive Orders seeking to root out Diversity, Equity and Inclusion (DEI) and “woke” policies in the federal government.⁵ These Executive Orders formed the basis of the administration’s first attacks on ED, challenging the authority of ED’s Office of Civil Rights (OCR) to enforce Title IX protections extended under the Biden Administration.⁶

In the weeks that followed, the Trump Administration cancelled hundreds of millions in federal funding for critical ED programming. On January 27, 2025, the administration issued a temporary freeze on federal funding considered to be inconsistent with President Trump’s Executive Orders,⁷ threatening a broad swath of ED

programming including programs for migrant students, adult education, specialized teacher training, and enrichment programs.⁸ This freeze was quickly rescinded, but it was a small taste of what was to come.⁹ In February, ED cut \$600 million in grants dedicated to training teachers and education agencies, citing “inappropriate and unnecessary topics” such as Critical Race Theory, DEI, and social justice activism.¹⁰ Days later, ED also cancelled 18 grants totaling \$226 million awarded under the Comprehensive Centers Program citing forced “radical agendas” and “race-based discrimination and gender identity ideology.”¹¹

At the same time, the Trump Administration and Elon Musk’s Department of Government Efficiency (DOGE) began implementing devastating cuts to staffing across the federal government.¹² During the week of February 13, 2025, the administration began firing probationary employees across the federal government, including 63 from ED.¹³ On February 24, 2025, the commissioner of the National Center for Education Statistics (NCES) was placed on leave.¹⁴ On March 4, 2025, the day after Linda McMahon was confirmed as Secretary of Education,¹⁵ reports indicated that the Department eliminated nearly half of the staff responsible for handling complaints submitted through ED’s Office of Federal Student Aid (FSA) website.¹⁶ On March 11, 2025, ED’s workforce was cut even further when Secretary McMahon announced the agency would be firing more than 1,300 workers and offering voluntary resignation and retirement to an additional 572, effectively reducing the ED workforce by nearly 50 percent.¹⁷

On March 20, 2025, President Trump formalized many of these efforts in an Executive Order instructing Secretary McMahon to pursue all necessary action to dismantle ED.¹⁸ These actions

were swiftly challenged in the courts. On March 24, 2025, a group of Massachusetts school districts and educator unions filed a lawsuit challenging President Trump's Executive Order to dismantle ED on the grounds that it is an unlawful overreach of executive authority and likely to "harm millions of students, school districts, and educators across the nation."¹⁹ On the same day, another lawsuit was filed challenging President Trump's efforts to gut the agency on the grounds that these actions are unconstitutional and already causing harm.²⁰ On May 22, 2025, a federal judge issued a preliminary injunction that blocked President Trump's Executive Order and reversed the mass layoffs.²¹ However, on July 14, 2025, the Supreme Court allowed the mass layoffs to proceed.²² Justice Sotomayor explained in her dissent that: "Lifting the District Court's injunction will unleash untold harm, delaying or denying educational opportunities and leaving students to suffer from discrimination, sexual assault, and other civil rights violations without the federal resources Congress intended."²³

The President's budget request for Fiscal Year 2026, released on May 2, 2025, indicates that he plans to continue to pursue his plan to dismantle ED.²⁴ The proposal reduces ED's budget by 15 percent and makes cuts to critical ED programs.²⁵ The Department administers funding to school districts to run 18 smaller programs supporting teacher training, literacy instruction, school safety, and students experiencing homelessness; this funding has been reduced from \$6.5 billion to \$2 billion in the President's budget.²⁶ The budget also proposes significant cuts to aid for students pursuing higher education, including an 80 percent cut to the federal work-study program,²⁷ and defunding of TRIO and GEAR UP programs which expand access to higher education for low-income and first-generation students.²⁸ Additionally, the American Federation of Teachers points out, "[p]roposals to drastically cut funding through

block grants will directly impact under-resourced districts and disproportionately harm vulnerable students."²⁹ Funding for essential building upgrades for heating, ventilation, and air conditioning have already been halted, leading to "an erosion of trust, opportunity and federal responsibility for education as a public good."³⁰ On July 4, 2025 President Trump signed his reconciliation package, the so-called "Big Beautiful Bill," into law, drastically cutting the federal student aid distributed by ED.

Amidst the Trump Administration's efforts to dismantle the Department of Education, Senator Warren in April 2025 launched the Save Our Schools campaign to investigate the direct impacts of these cuts on students, families, teachers, and schools in America.³¹ In a series of letters to the administration, she sought information on the impacts of President Trump's dangerous policies,³² and succeeded in urging the Department of Education Acting Inspector General to open an investigation into these actions.

On May 14, 2025, Senator Warren led a Senate spotlight forum entitled "Stealing the American Dream: How Trump and Republicans Are Raising Education Costs for Families," highlighting the consequences of President Trump and Secretary McMahon's cuts to federal student aid programs.³³ Witnesses included Ms. Tiffany Aliche, influencer and personal finance educator; Professor Jonathan Glater, Professor of Law & Associate Dean of J.D. Curriculum and Teaching at the UC Berkeley School of Law; Ms. Bonnie Latreille, Former Student Loan Ombudsman at the U.S. Department of Education; and, Ms. Bonni Snider, a U.S. Army veteran and former student loan borrower.³⁴ Witnesses highlighted how student loan borrowers would be harmed by the cuts at ED through lack of oversight, reduced opportunities for funding, and fewer pathways for relief from fraudulent or predatory lenders.³⁵

On April 23, 2025, Senator Warren launched a comprehensive investigation into the impacts of the Trump Administration's policies on the ground for students, student loan borrowers, and educators across the country. She wrote to 12 leading national organizations representing students, teachers, parents, borrowers, and administrators in K-12 and higher education requesting information on the effects of grant terminations, funding cuts, personnel terminations, and the elimination of key ED programs.³⁶ These organizations included the American Council on Education (ACE), National Association of Secondary School Principals (NASSP), National Parents Union (NPU), National Education Association (NEA), American Federation of Teachers (AFT), Student Borrower Protection Center (SBPC), Council of Parent Attorneys and Advocates (COPAA), National Center for Youth Law (NCYL), National Association for the Advancement of Colored People (NAACP), National Women's Law Center (NWLC), Institute for Higher Education Policy (IHEP), and the Association for Institutional Research (AIR). What follows are the key findings from this investigation.

III. Key Findings

A. Cuts to Office of Federal Student Aid staff and student loan programs will limit college attendance and delay borrower access to loans and debt relief.

FSA helps students and families navigate financial aid options, provides important oversight over federal student loan servicers, and oversees the Free Application for Federal Student Aid (FAFSA).

FSA administers over \$120 billion in grants, work-study, and student loans annually³⁷—according to NWLC, FSA “programs make it possible for more than 9.9 million students to attend institutions of higher education.”³⁸ Of the more than 19 million students enrolled in postsecondary institutions in the 24-25 academic year, 3.6 million received subsidized student loans; 5 million received unsubsidized loans; nearly 1 million received a PLUS loan; 1.8 million received a Federal Supplemental Educational Opportunity Grant; and over 430,000 participated in the Federal Work-Study program.³⁹

In Fiscal Year 2024, FSA received nearly 300,000 complaints, over 90 percent of which were submitted online.⁴⁰ But on March 4, 2025, Secretary McMahon’s ED reportedly fired eight out of the 21 people responsible for handling complaints submitted on FSA’s website.⁴¹ One week later, the agency fired nearly half of its remaining employees, reducing the 1,400 person FSA staff by 300, with substantial cuts to FSA personnel responsible for addressing student aid complaints.⁴² These complaints include technical issues with FAFSA applications, problems with student loan repayment, and other high-stress financial concerns.⁴³

These reductions in staff are already damaging the ability of the office to administer federal student aid, and according to NPU, “[t]he day after a team responsible for FAFSA was laid off, the FAFSA website, crucial for college financial aid applications, temporarily went offline.”⁴⁴ From a survey of the National Association of Student Financial Aid Administrators, “59% of institutions reported noticeable changes in FSA responsiveness or delays in processing timelines since the reduction in force. Nearly one-third cited disruptions to [FAFSA] and e-App systems, undermining aid eligibility reviews and program compliance.”⁴⁵ Delays and inefficiencies in student loan processing can have costly consequences; as ACE points out, “delayed funding, especially in the instances of student financial aid, can result in the inability of students to enroll for classes and persist through to completion in a timely fashion, causing them to take on more student loan debt to complete their degrees.”⁴⁶

Key functions of FSA that exist to protect students and families have already been hobbled by the staffing cuts, “including those responsible for school eligibility oversight and vendor oversight, which impacts compliance monitoring and the student debt discharge process,”⁴⁷ says NPU. The vendor oversight team is responsible for ensuring that loan servicers abide by consumer protection laws, and according to former FSA Student Loan Ombudsman Bonnie Latreille, it has been decimated.⁴⁸ This, combined with the firings of dozens of ED employees responsible for resolving borrower complaints related to loan servicing,⁴⁹ has introduced costly delays into the management of student loans. According to SBPC, “[m]ore than 10,000 students and

borrowers have been left waiting for responses to their complaints following dozens of Department employees being fired from the Office of the Student Loan Ombudsman.”⁵⁰ The federal court opinion that paused President Trump’s reductions in force even states that “the dramatic cuts to FSA will undermine FSA’s ability to monitor and fix existing and new servicing issues.”⁵¹

In addition, outstanding issues are no longer being effectively monitored and tracked. SBPC notes that “hundreds of thousands of borrowers who are missing eligible months toward Public Service Loan Forgiveness (PSLF) and Income Drive[n] Repayment (IDR) forgiveness, and over ten thousand borrowers are still owed refunds due to late adjustments to their student loan accounts.”⁵² According to AFT, “[m]illions of borrowers are being denied their legal right to affordable repayment.”⁵³

Dismantling FSA will wreak havoc for students and families who depend on federal loans and grants to pay for their education, leading to higher education costs; opening the door to predatory lending, fraud, and abuse; and according to NEA, “eliminat[ing] the federal floor that ensures protection for students against education profiteers who seek to profit off students rather than educate them.”⁵⁴

In addition, President Trump’s reconciliation package makes severe cuts to federal student aid. It places highly restrictive caps on Parent PLUS loan and eliminates Grad PLUS loans altogether, drastically limiting the amount of aid graduate students can access to fund their education.⁵⁵ As AIR points out, “[t]he reduced support for students will decrease college attendance for first-generation and other

students who don’t have financial resources.”⁵⁶ NAACP reports that students in the midst of their college education have not received guidance on whether their funding will last through graduation.⁵⁷ Beyond the student loan caps, the President’s reconciliation package also replaces the Biden-era Saving on a Valuable Education repayment plan with a Repayment Assistance Plan which will increase monthly payments for many borrowers—in some cases, by hundreds of dollars per month.⁵⁸

On May 5, 2025, the Department resumed taking money by force from borrowers in default, impacting “[m]ore than 6 million people in default on a student loan who now face wage garnishment,” according to SBPC.⁵⁹ During a June 10, 2025 meeting with Senator Warren, Secretary McMahon said that she does not intend to restart Social Security offsets for people with defaulted loans, but borrowers are still subject to wage garnishment and other forced collections.⁶⁰ Currently, “over 2.9 million people over the age of 62 owe federal student loan debt,”⁶¹ and had Secretary McMahon not reversed course on Social Security offsets,⁶² almost half a million of these borrowers were likely to face forced collections of their Social Security benefits.⁶³

According to SBPC, “[t]oday, 42 million Americans owe student loan debt—a number that makes up about 15 percent of adults. Estimates from the University of California Student Loan Law Initiative suggest, “more than 1-in-12 U.S. adults will be directly, negatively affected by the Trump administration’s actions in the student loan market,” including harms from defaulting on student loans, damage to credit scores, forced collections, and spikes in monthly

payments under provisions of the President’s reconciliation package.⁶⁴

By gutting FSA, the administration is pushing students and families into the private student loan market, while simultaneously removing critical protections. SBPC points out FSA’s “responsib[ility] for ensuring students are able to access relief after being defrauded by their school or if they attended an institution that suddenly closed”⁶⁵ is now more crucial than ever because the Consumer Financial Protection Bureau, which typically affords additional protections to borrowers, is facing devastating reductions of its own.⁶⁶ The Department has abolished its Vendor Oversight and Vendor Performance Divisions, leaving almost no capacity to monitor servicing issues.⁶⁷ For borrowers who fall victim to common student loan debt relief scams—fraudulent offers of reduced student loans payments or debt forgiveness in exchange for a fee—FSA is responsible for monitoring these complaints and referring them to state and local law enforcement.⁶⁸ The agency no longer has sufficient staffing to manage these referrals, and accordingly, the victims are unlikely to find relief.⁶⁹

Gutting FSA is already leading to higher costs for students and families relying on financial aid and with less oversight and security, predatory lenders will see an expanded role in the student loan market, exacerbating existing problems.

B. Dismantling the Office of Civil Rights limits its ability to ensure that students receive an education free from discrimination.

OCR enforces civil rights laws prohibiting discrimination based on race, color, national origin, sex, and disability in programs and

activities receiving federal funds.⁷⁰ In 2024, OCR received 22,687 complaints; OCR is required to respond to all of them.⁷¹ At the start of the Trump Administration, 12,000 civil rights complaints were still pending with OCR.⁷²

As part of the Trump Administration’s indiscriminate cuts to the federal workforce, OCR lost at least 240 out of 568 employees and seven out of twelve regional offices were closed including those in New York City, Boston, Philadelphia, Chicago, Cleveland, San Francisco, and Dallas,⁷³ “leav[ing] 46.413 million students in 27 States and territories without dedicated civil rights investigators in regional offices.”⁷⁴ The staffing cuts have also inundated remaining OCR investigators with caseload increases from around 50 to up to 300.⁷⁵ According to reports, most of the laid-off employees were attorneys responsible for investigating complaints from families who believed a school had discriminated against their child.⁷⁶ The seven shuttered OCR offices were responsible for handling civil rights cases for over half of the country, including 6,000 open investigations.⁷⁷

With OCR lacking the investigators and attorneys to follow up and enforce resolution agreements, COPAA reports failures by OCR to investigate complaints, provide remediation, and even answer the phones.⁷⁸ And according to ACE, this has led to “reduced enforcement of the core civil rights laws that seek to ensure all students, but especially those that have been subject to a history of racial and systemic discrimination, are protected.”⁷⁹ In one case, a student undergoing cancer treatment was marked as truant, in violation of accommodations provided under anti-discrimination law, and it is impossible for the child’s parents to challenge since OCR is not responding to their requests.⁸⁰

Another direct impact of the firing of hundreds of OCR employees⁸¹ is the inability of the office to ensure that students with disabilities have equal access to educational opportunities. This access is required by Section 504 of the *Rehabilitation Act of 1973*,⁸² and since 2000, with the help of OCR, the number of students with 504 eligibility has increased from slightly over 600,000 students (0.67%) to over 1.5 million (3%), NCYL points out.⁸³ Closures of ED's OCR regional offices will be especially devastating for these students because, as NEA says, "[t]he office's role is essential for students with disabilities, who represent most of OCR's outstanding cases."⁸⁴

Resources for students with disabilities, which were already "woefully underfunded" prior to the recent round of cuts, now face an existential threat.⁸⁵ At present, 7.5 million students receive special education services under the Individuals with Disabilities Education Act (IDEA).⁸⁶ The Department's Office of Special Education Programs (OSEP) oversees state implementation and compliance with IDEA through accountability and oversight measures.⁸⁷ Among these accountability measures is a review of states' compliance with a statutory affirmative duty to identify all students with disabilities. In past reviews, up to 38 percent of states were "were noncompliant with requirements for conducting evaluations,"⁸⁸ according to NCYL. Dismantling ED is likely to lead to even higher levels of non-compliance, leading to more students being denied Free Appropriate Public Education,⁸⁹ all without sufficient access to the complaint and remediation processes facilitated by OCR.

C. Cuts to the Institute of Education Sciences threaten the collection and dissemination of critical federal data.

Congress established a precursor to the Department of Education in 1867 for the purpose of "collect[ing] information on schools and teaching that would help the States establish effective school systems."⁹⁰ The agency has undergone significant changes since then, but ED's role in improving primary and secondary education by serving as a centralized hub for collecting, aggregating, and disseminating data and statistics about education is still core to its function and mandated by federal statute.⁹¹ Following President Trump's recent actions at the recommendation of DOGE, including the abrupt cancellation of dozens of grants⁹² and millions of dollars in funding⁹³ and the termination of critical personnel,⁹⁴ the Department can no longer fulfill this role.

The majority of the Department's work on education data and statistics has been done by ED's Institute of Education Sciences (IES), which is responsible for coordinating research and evaluation of federal programs and policies, compiling comprehensive statistics and surveys on education, and funding the development of new programs, policies, and approaches to improve educational outcomes.⁹⁵ The IES operates NCES, which is a research agency tasked with collecting and analyzing educational statistics.⁹⁶ Data from NCES has enabled critical research on class-size reductions,⁹⁷ COVID learning loss,⁹⁸ and chronic absenteeism⁹⁹ that have led to positive outcomes in student learning, cognitive development, and attitudes about education.

Under President Trump's efforts to reduce the federal workforce, IES has been decimated,

losing nearly 90 percent of its employees and leaving “the statistics, research, and evaluation arm of the U.S. Department of Education”¹⁰⁰ with a workforce of only 20 people.¹⁰¹ March 2025 staff terminations hit NCES especially hard; once over 100 employees, “this office has been reduced to a mere three employees, hindering the once robust research arm in fulfilling its duties.”¹⁰²

Much IES work is carried out through external contracts for data collection, program evaluation, technical assistance, and website maintenance, many of which were abruptly terminated in February 2025 at the recommendation of DOGE.¹⁰³ According to NPU, “[a]t least 40 different organizations had agreements with IES abruptly terminated. Some terminated IES contracts were for work mandated by Congress.”¹⁰⁴

Two key ED contracts, one for the National Postsecondary Student Aid Study (NPSAS) and one for the Beginning Postsecondary Students Longitudinal Study (BPS), both of which IHEP says provide “unique data on how students finance their education, how different populations navigate college, and how students’ experiences in college affect their outcomes,” were cancelled in February.¹⁰⁵ Results from these studies, combined with FAFSA data, provide the backbone of evidence-based and data-driven policymaking around federal student aid. This data formed part of the Government Accountability Office’s (GAO’s) recent study of means-tested benefit use and eligibility for federal student aid recipients, which led to GAO recommending that ED collaborate with United States Department of Agriculture to improve how the agencies communicate Supplemental Nutrition Assistance Program (SNAP) eligibility to FAFSA applicants.¹⁰⁶

NPSAS and BPS data have offered important insights into how veterans enroll and pay for college using benefits like the GI Bill,¹⁰⁷ and how students experiencing housing insecurity can access resources necessary to support their educational success.¹⁰⁸

NCES is also responsible for collecting data for the Integrated Postsecondary Education Data System (IPEDS), a repository of information from every college, university, technical, and vocational institution participating in federal student aid programs.¹⁰⁹ IPEDS includes institution-level data on enrollment, costs, financial aid, and graduation rates and provides the underlying data for tools like College Scorecard. It has institutional response rates of nearly 100 percent.¹¹⁰ Without this data, IHEP says, “families would be left without the only reliable federal resource to help them make informed choices about one of the most significant financial and personal decisions of their lives.”¹¹¹

At current NCES staffing levels, institutions are also concerned about the future of IPEDS. According to AIR, “losing the longitudinal data on enrollment, completions and some other trends would result in less informed higher education policy,”¹¹² and “[i]t will become harder for us to benchmark ourselves to other universities without having to pay for access to data from third party vendors.”¹¹³ IPEDS also plays an important role in higher education accreditation, and the dismantling of ED has raised concerns about this process. As AIR points out, “accreditation is a wonderful source of peer feedback and continuous improvement, and also happens to be a good example of public/private partnership.”¹¹⁴

IES also administers the National Assessment of Educational Progress (NAEP), a long-running assessment of reading and mathematics skills for students aged 9, 13, and 17, which has been put in critical danger. As NPU points out, “[w]hile core 4th and 8th grade ELA/math NAEP tests are planned, the contract for the NAEP assessment for 17-year-olds was cancelled, along with supporting contracts.”¹¹⁵ NAEP, often referred to as The Nation’s Report Card,¹¹⁶ is congressionally mandated and has been running since 1969.¹¹⁷ It is critical for long-term trend assessment and data-informed policymaking.

D. Plans to transfer responsibilities to other agencies are wasteful and will increase the cost and complexity of performing essential Department functions.

Prior to the establishment of ED, federal education policy was managed across multiple agencies including the Department of Labor (DOL); Department of Housing and Urban Development (HUD); DOJ; Department of Health, Education, and Welfare; and the National Science Foundation.¹¹⁸ This resulted in inefficiencies and duplication of work, a challenge explicitly referenced in the law establishing ED, which asserted that “there is a need for improvement in the management and coordination of Federal education programs to support more effectively State, local, and private institutions, students, and parents in carrying out their educational responsibilities,”¹¹⁹ and “the dispersion of education programs across a large number of Federal agencies has led to fragmented, duplicative, and often inconsistent Federal policies relating to education.”¹²⁰ As part of its effort to dismantle ED, the administration has indicated it will move key ED functions into other agencies.¹²¹ But as ACE warns, “in seeking to eliminate the Department, this administration

will instead be returning to the problems of the past.”¹²²

On March 21, 2025, President Trump announced plans to move the handling of federal student loans into the Small Business Administration (SBA) and to relocate programs for students with disabilities to the Department of Health and Human Services (HHS).¹²³ These shifts have not yet happened, but if they do, they will make these programs costlier and less efficient—hurting students and borrowers.

Plans to move FSA’s responsibilities to SBA or Treasury, beyond being illegal, “would put tens of millions of vulnerable borrowers at severe risk of financial catastrophe.”¹²⁴ Today, only “40 percent of student loan borrowers are current on their monthly payments,” while millions more are struggling and falling behind on payments under the recent resumption of student loan repayment after the COVID-19 pandemic pause.¹²⁵ SBPC says, “[m]oving the student loan program at a time when borrowers are facing such significant borrower distress risks exacerbating the confusion and instability borrowers are already experiencing and risks even more borrowers falling through the cracks.”¹²⁶

Moreover, FSA’s portfolio outweighs the SBA portfolio in both size and complexity, and SBPC points out, “[a]s it stands today, the federal student loan portfolio is nearly four times the size of the current SBA loan portfolio, and nearly 16 times larger than its historic portfolio.”¹²⁷ Secretary McMahon has stated her intention to move the student loan program into Treasury,¹²⁸ but it is even more ill-suited for the task: it does not have any experience administering individual loans.¹²⁹ All of this is happening in the context of significant staffing cuts to both SBA and Treasury.¹³⁰

Department programs that support students with disabilities transitioning into higher education, vocational training, or the workforce are also being dismantled and moved. As one example, the Charting My Path for Future Success program “aimed at helping teens with disabilities transition from high school,”¹³¹ was abruptly terminated, says the NPU, “leaving students with disabilities and their families without expected support for critical life transitions.”¹³² Now, plans to move the Rehabilitative Services Administration, which is currently housed within ED, into DOL, are raising concerns since DOL has no expertise or experience with the education components essential to these transitions.¹³³

There is also concern about potential plans to move IDEA oversight to HHS, which NCYL says would “strip away decades of hard-won progress for students with disabilities.”¹³⁴ This shift, they say, would “imply an abandonment of the social model of disability—which recognizes that institutions must remove barriers to full participation—and return to an outdated medical model that treats disabilities as pathologies to be contained rather than differences to be accommodated.”¹³⁵

The Trump Administration also appears to be initiating the transfer of ED’s duties to investigate and remedy civil rights violations over to DOJ. For example, on April 4, 2025, ED and DOJ formed a Title IX Special Investigations Team consisting of investigators from the two departments.¹³⁶ OCR is “free and does not require legal representation, which allows families and students who cannot afford a lawyer a pathway to enforce their civil rights,” as NWLC explains.¹³⁷ In comparison, DOJ cannot employ many of the key procedures necessary to carry out

civil rights enforcement such as mediation, voluntary resolution, and settlement procedures available to OCR. NEA points out, “[DOJ] would have only the tool of litigation in federal court, a lengthy and resource-intensive process that would render the federal government unable to handle the thousands of civil rights complaints currently on OCR’s docket.”¹³⁸ This will lead to higher costs through resource-intensive litigation, and more students would be left vulnerable and without adequate civil rights protections while cases move through the courts.¹³⁹

Relocating existing ED programming affecting tens of millions of students into agencies without any expertise in education policy raises concerns about increased costs, administrative complexity, duplication of effort, and as ACE points out, “will meaningfully reduce the oversight and effectiveness of those programs,”¹⁴⁰ resulting in “profoundly negative impacts on students, families, and institutions of higher education.”¹⁴¹

It is also unclear whether other federal agencies have the capacity to take on additional functions given DOGE firings and reductions in force across the federal government. The Department of Education has held almost 900 grant competitions since October 2024. In the absence of ED, these competitions will be redistributed to other federal agencies, most likely DOL, HUD, DOJ, and HHS.¹⁴² However, these agencies are all dealing with critical staffing shortfalls and DOGE-related terminations of their own. ACE says, “requiring myriad federal agencies who are undergoing a reduction in force to take on new grant competitions will only place undue burdens on those agencies resulting in greater delays, disruptions, and decreased efficiency.”¹⁴³

IV. Conclusion

The Department of Education currently serves 62 million students across the country.¹⁴⁴ The dismantling of the Department undertaken by President Trump, Secretary McMahon, Elon Musk, and DOGE has already disrupted ED's ability to assist student loan borrowers, help students and families remediate civil rights claims and receive an education free from discrimination, and provide Americans access to data and analysis on education policies and institutions. If President Trump succeeds in completely eliminating the Department of Education, millions of students, teachers and families will pay the price.

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