



# **Understanding the Trump Administration's Impact on Government Contractors and Grant Recipients**

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**December 4, 2025**

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# Agenda

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**01**    **Key Policy Initiatives Impacting Contractors and Grantees**

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**02**    **Key Court Cases**

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**03**    **Key Enforcement Trends**

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# Key Policy Initiatives Impacting Contractors and Grantees

# The DEI Landscape in 2025

- DEI a clear priority and focus for the current administration
- Multiple Executive Orders addressing DEI
- Agency guidance and enforcement memoranda (DOJ, EEOC, OPM)





Since January, 2025, President Trump has issued several Executive Orders targeting DEI activities undertaken by federal contractors and grantees

- **E.O. 14151: Ending Radical and Wasteful Government DEI Programs and Preferencing** (January 20, 2025)
  - Directs the termination of “equity-related” grants or contracts.
  - Directs agencies to generate a list of all “Federal contractors who have provided DEI training or DEI training materials to agency or department employees; and . . . Federal grantees who received federal funding to provide or advance DEI, DEIA, or ‘environmental justice’ programs, services, or activities” since January 1, 2021.
  - Requires federal agencies to terminate all DEI performance requirements for employees, contractors, and grantees.
- **E.O. 14168: Defending Women from Gender Ideology and Extremism and Restoring Biological Truth to the Federal Government** (January 20, 2025)
  - Directs agencies to ensure that “grant funds do not promote gender ideology.”
  - Requires each agency to submit an update within 120 days that addresses “agency-imposed requirements on federally funded entities, including contractors, to achieve the policy of th[e] order.”

## Diversity, Equity & Inclusion Initiatives

- **E.O. 14173: Ending Illegal Discrimination and Restoring Merit-Based Opportunity** (January 21, 2025)
  - Directs the Attorney General to develop a plan identifying “egregious and discriminatory DEI practitioners,” and each agency to identify up to nine potential civil compliance investigations of large entities.
  - Requires all federal contractors and grantees to certify that they “do[] not operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws.”
  - Rescinds E.O. 11246, which was issued in 1965 to impose affirmative action obligations on federal contractors.
- **E.O. 14281: Restoring Equality of Opportunity and Meritocracy** (April 23, 2025)
  - Directs the repeal or amendment of certain regulations that impose disparate-impact liability on, and require affirmative action by, recipients of federal funding under Title VI, such as universities, nonprofits, and certain contractors.
  - As a result of this Executive Order, federal agencies are unlikely to initiate investigations or enforcement actions relying on disparate-impact theories.



# Agency Guidance on “Illegal DEI”: Enforcement Memoranda

- **DOJ Enforcement Memoranda**
  - *Ending Illegal DEI and DEIA Discrimination and Preferences*
  - *Eliminating Internal Discriminatory Practices*
  - *Guidance for Recipients of Federal Funding Regarding Unlawful Discrimination*
- **Office of Personnel Management (OPM) Memorandum**
  - *Further Guidance Regarding Ending DEIA Offices, Programs, and Initiative*
- **EEOC-DOJ Joint Guidance**
  - *What to Do if You Experience Discrimination Relating to DEI at Work*
  - *What You Should Know About DEI-Related Discrimination at Work*
  - *FAQs*



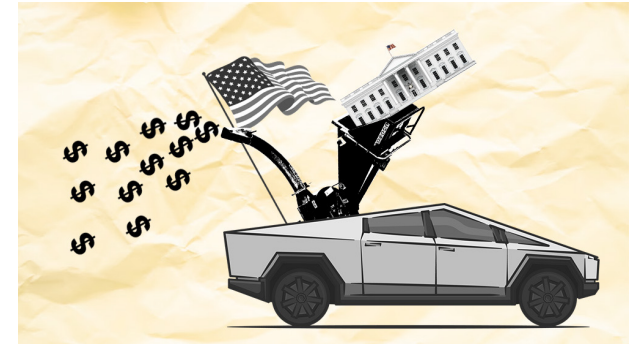
## Agency Guidance on “Illegal DEI”: DOJ Guidance

- **The Administration’s position is that unlawful DEI includes:**
  - Programs that grant preferential treatment based on protected characteristics
  - Policies that use facially-neutral proxies for protected characteristics
  - Practices that segregate individuals based on protected characteristics
  - Policies that unlawfully consider protected characteristics in selection decisions
  - Trainings that exclude or penalize participants based on protected characteristics

# Department of Government Efficiency (“DOGE”): Creation and Related Orders

## DOGE-related changes to the federal contracting process

- President Trump created DOGE through Executive Order on January 20, 2025, with the stated purpose of eliminating “waste, fraud, and abuse” in the federal government.
- On February 26, 2025, President Trump signed “**Implementing the President’s ‘Department of Government Efficiency’ Cost Efficiency Initiative,**” which directed agencies to:
  - Require that each payment made pursuant to contracts or grants be supported by a “brief, written justification” or be subject to a pause in payment; and
  - Review all existing covered contracts and grants (to include all “discretionary spending through Federal contracts, grants, loans, and related instruments”) and terminate or modify them to reduce federal spending and promote efficiency.
  - Exceptions to the E.O. include contracts and grants related to immigration and law enforcement, the military, public safety, and the intelligence community.
- Current Status of DOGE



# GSA Contract Reviews

## Background

- On February 6, 2025, the General Services Administration (“GSA”) sent a letter to all agencies directing them to review all “consulting” contracts and consider terminating those that are considered “**non-essential**.”
  - The letter defines “non-essential” as “any contract that merely generates a report, research, coaching or an artifact.”
- GSA also began reviewing “consulting” contracts with large companies in February 2025. It asked them to provide detailed information on their contracts, broken down by agency and type of service, from fiscal year 2019 through 2024. It required companies to report ideas for identifying waste and savings opportunities.
  - In these letters, Federal Acquisition Service Commissioner Josh Gruenbaum described a shift to more **outcome-based contracting** and expected “significant discounting compared to current pricing.”



# GSA Contract Reviews

## Consolidating Procurement within GSA

- On March 20, 2025, President Trump signed an E.O. entitled “**Eliminating Waste and Saving Taxpayer Dollars by Consolidating Procurement.**” It directed agencies to:
  - Consolidate domestic procurement services for “common goods and services,” and for Government-wide acquisition contracts (GWACs) for information technology (IT), within GSA.
  - The E.O. defined “common goods and services” as the common Government-wide categories defined by the Category Management Leadership Council led by the Office of Management and Budget (OMB).
- On July 18, the OMB Director issued additional guidance detailing two “workstreams” for agency involvement:
  - Increase the use of centralized contracts before pursuing new contracts;
  - Assess the viability of consolidating procurement functions within GSA to avoid mission disruptions.





# Revolutionary FAR Overhaul

## Background

- On April 15, 2025, President Trump signed **E.O. 14275, entitled “Restoring Common Sense to Federal Procurement,”** which directed revision of the Federal Acquisition Regulation (“FAR”) to contain “only provisions required by statute or essential to sound procurement.”
- On August 15, 2025, the Office of Federal Procurement Policy began implementing the E.O. by announcing a “**Revolutionary FAR Overhaul,**” which has made major updates to the FAR with the stated goal of reducing regulatory complexity and allowing federal agencies to remove non-critical requirements.

## Current Status

- As of the end of September, model deviation texts have been released for several FAR parts under the FAR Overhaul. Notable model deviation guidance includes:
  - **FAR Part 12:** consolidating commercial procedures and terms and conditions
  - **FAR Part 15:** restructuring contract pricing
  - **FAR Part 31:** streamlining contract cost principles and procedures
  - **FAR Part 44:** clarifying subcontracting policies and procedures
- On October 30, the FAR Council released the **FAR Companion 2.0**, which “provides context, additional information, and practical advice for planning, awarding, managing, and closing out contracts, consistent with the FAR’s core buying principles.”



# DoD Acquisition Reform

On November 7, 2025, the Secretary of Defense released several memoranda outlining the Department's planned acquisition reform, as well as an Acquisition Transformation Strategy

- **"Transforming the Defense Acquisition System into the Warfighting Acquisition System to Accelerate Fielding of Urgently Needed Capabilities to Our Warriors"**
  - This memorandum listed several core themes that will guide reform of DoD acquisition: speed and agility, risk acceptance, commercial leverage, strategic alignment, and department-wide accountability.
  - Other structural changes include implementing non-FAR-based contract instruments as preferred agreements, prioritizing commercial offerings, creating new contracting guidelines and incentives, and asserting "Unlimited or Government Purpose Rights" to allow DoD to aggressively seek IP and data rights.
- **Acquisition Transformation Strategy**
  - The Strategy sets out five pillars for acquisition reform, designed to speed up contract delivery and execution. Key provisions seek to:
    - Expand the industrial base by increasing the number of companies supplying DoD, awarding longer deals and multi-year procurements, accelerating commercial preference, negotiating directly with commercial suppliers, and pursuing bid protest reform to include a "loser pay" provision.
    - Maximize acquisition flexibility by reducing regulations and overhauling the FAR and DFARS.

# Key Court Cases

# Supreme Court Decisions on Jurisdiction to Hear Challenges

## Federal Jurisdiction over Grant Termination Cases

- In *per curiam* emergency stay orders this year, the Supreme Court held that federal district courts likely lack jurisdiction under the Administrative Procedure Act to hear challenges to terminations of federal grants.
- ***National Institutes of Health v. American Public Health Association*, 606 U.S. \_\_ (2025)**
  - The Court ruled 5-4 that challenges to grant terminations are breach of contract actions for monetary damages—and, as such, belong in the Court of Federal Claims under the Tucker Act rather than in federal district courts. The Court did not block the district court’s vacatur of general agency guidance documents.
  - The Court of Federal Claims generally does not have the authority to grant equitable relief—including the restatement of grants—which many federal contractors seek in grant termination cases.
- **Lower court interpretations and the prospect of split relief**
  - Lower courts appear to be following Justice Barrett’s controlling concurrence in *NIH*, which states that though federal district courts lack jurisdiction to hear challenges to grant terminations based on agency guidance, they still retain jurisdiction to hear challenges to that guidance and issue appropriate relief.
  - In some circumstances, federal contractors and grantees seeking redress for terminated grants may need to first seek prospective relief under the APA in district courts, then, after having obtained a ruling that the agency action was arbitrary and capricious, seek retrospective relief and damages before the Court of Federal Claims.

## Pending Contractor Immunity Cases

### FTCA Exceptions and the Right to Immediate Appeal

- ***Hencely v. Fluor Corporation*, 120 F.4th 412 (4 Cir. 2024) (cert. granted)**
  - On November 3, 2025, the Supreme Court heard oral argument over whether military contractors have absolute immunity for negligence in an active war zone.
  - Specifically at issue was whether *Boyle v. United Technologies Corp.* should be extended to allow the combatant-activities exception to the FTCA to grant immunity when the *contractor's* policies caused the incident.
  - The defendant argued, and the Fourth Circuit agreed, that it was immune because combat is a “uniquely federal interest” that supersedes state law.
- ***The GEO Group, Inc. v. Menocal*, 882 F.3d 905 (10th Cir. 2024) (cert. granted)**
  - On November 10, 2025, the Supreme Court heard oral argument over whether an order denying a government contractor’s claim of derivative sovereign immunity is immediately appealable under the collateral-order doctrine.
  - Contractors have a defense to liability for actions taken pursuant to federal directives under *Yearsley v. W.A. Ross Construction Co.*, 309 U.S. 18 (1940).

# Key Enforcement Trends under the False Claims Act

## The False Claims Act

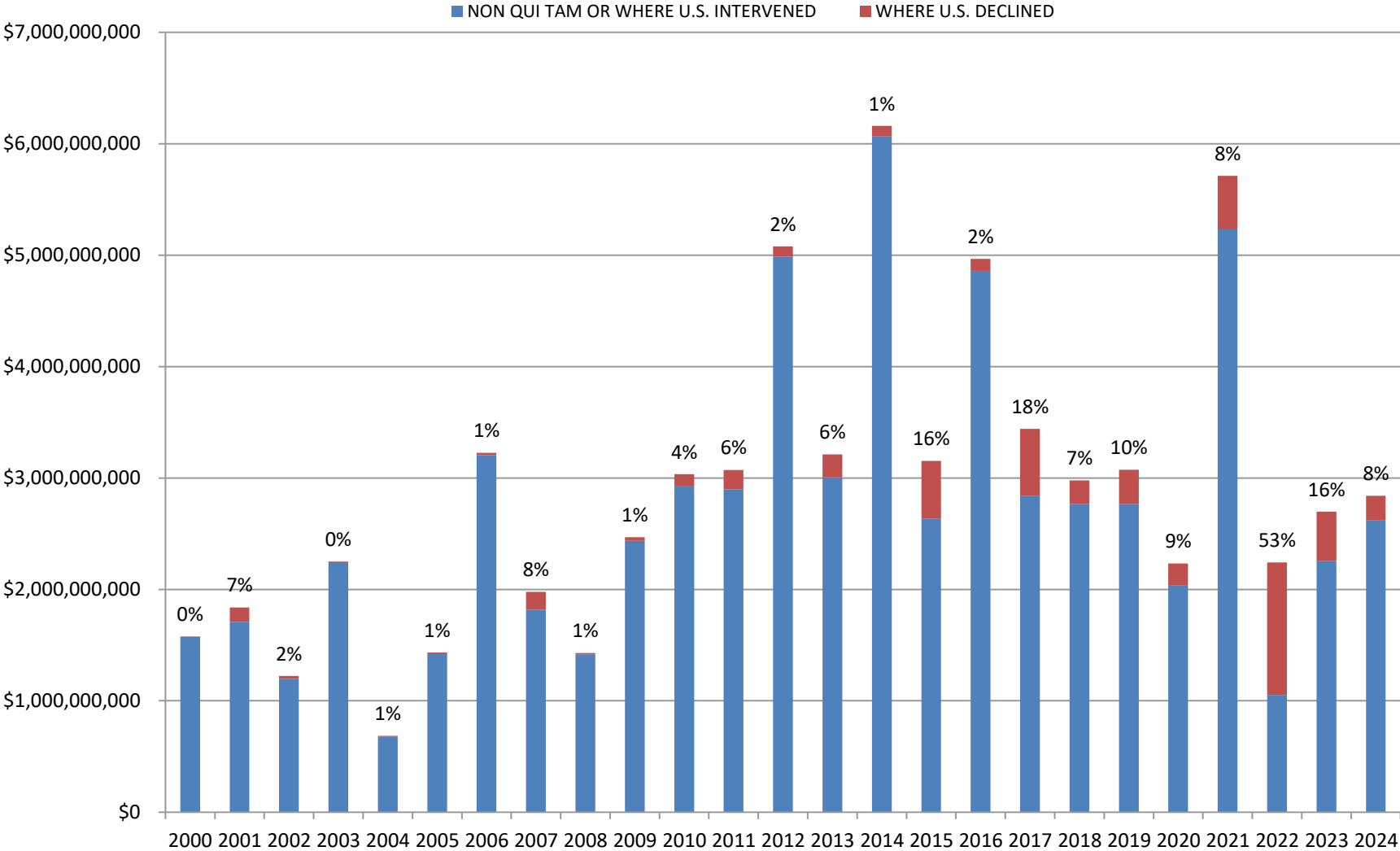
- The False Claims Act, 31 U.S.C. § 3729, creates civil liability for any person who “knowingly”:
  - **Submits or causes the submission of a false or fraudulent claim;**
  - **Uses or causes to be used a false record or statement material to a false or fraudulent claim;**
  - **Avoids or decreases an obligation to pay or transmit money to the government.**
- The FCA provides for recovery of
  - **treble damages; and**
  - **per claim, inflation adjusted civil penalties.**
- Whistleblower (*qui tam* relators) may bring suit under the FCA and secure **as much as 30%** of government recoveries.

“In short, sir, I have based the [FCA’s *qui tam* provision] upon the old-fashioned idea of holding out a temptation and ‘**setting a rogue to catch a rogue**,’ which is the safest and most expeditious way I have ever discovered of bringing rogues to justice.”

*Statement of Senator Howard,  
Cong. Globe, 37th Cong. 955-56  
(1863)*

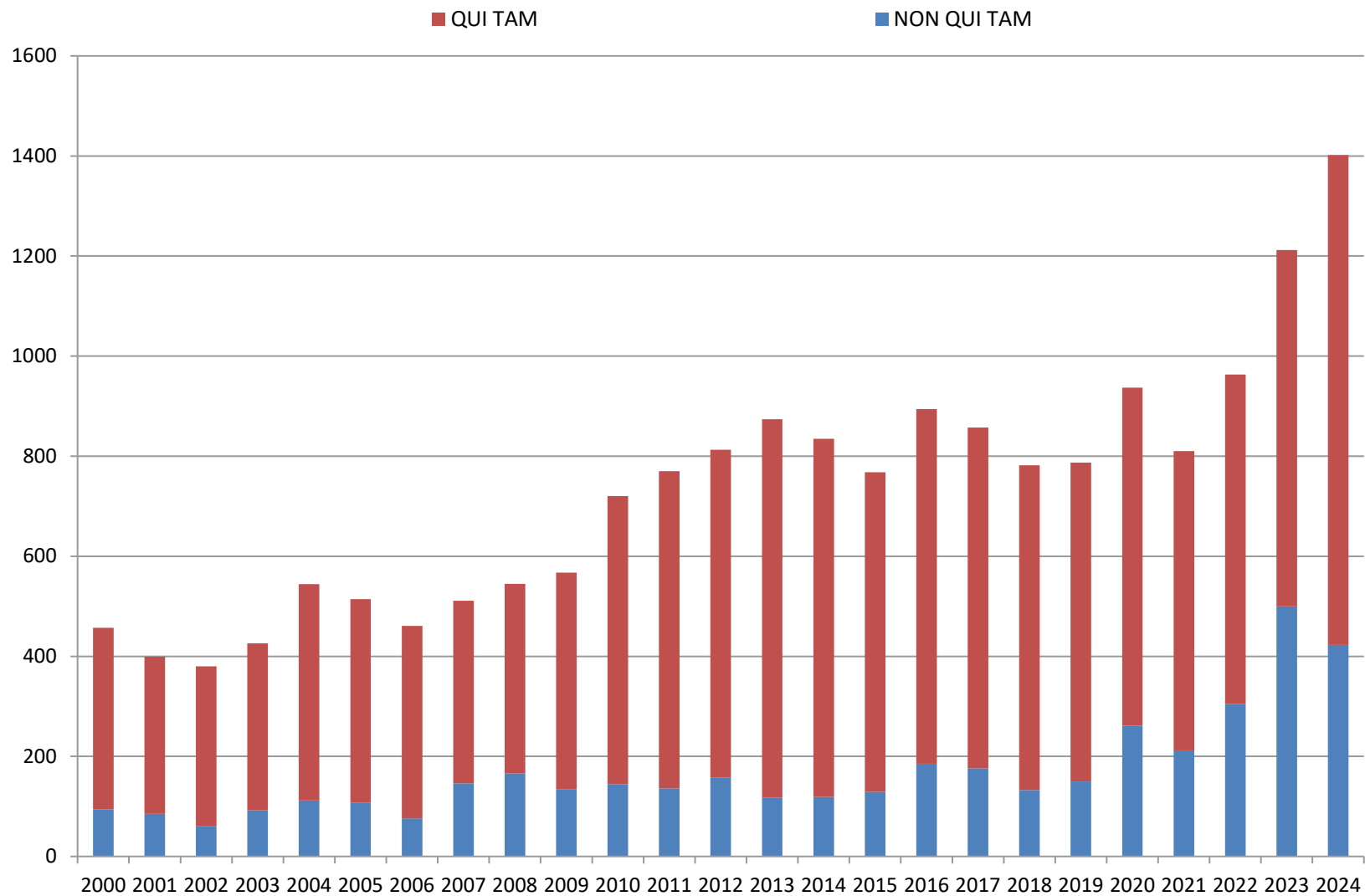


DOJ Recovers Billions of Dollars in FCA Resolutions Every Year



Source: DOJ "Fraud Statistics – Overview" (Jan. 15, 2025)

New FCA Cases: 2000 - 2024



Source: DOJ "Fraud Statistics – Overview" (Jan. 15, 2025)

More than 1000  
New FCA Matters  
are Started Every  
Year – With a  
Clear Upward  
Trend


## The Trump Administration Embraces the False Claims Act

- The Trump Administration has embraced the False Claims Act as a key enforcement tool in its pursuit to eliminate waste, fraud, and abuse.
- Traditional areas of FCA enforcement—**e.g. procurement fraud and bid rigging**—have been reemphasized.
- New areas of enforcement have emerged:
  - *DEI and Civil Rights;*
  - *Immigration;*
  - *Trade/Customs Fraud;*
  - *Cybersecurity*



# DOJ Has Promised Aggressive Pursuit of FCA Cases

## June 11, 2025 Memorandum from AAG Brett Shumate:

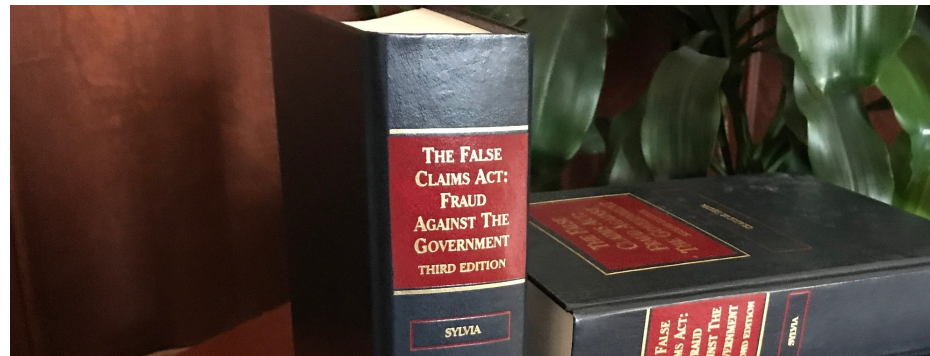
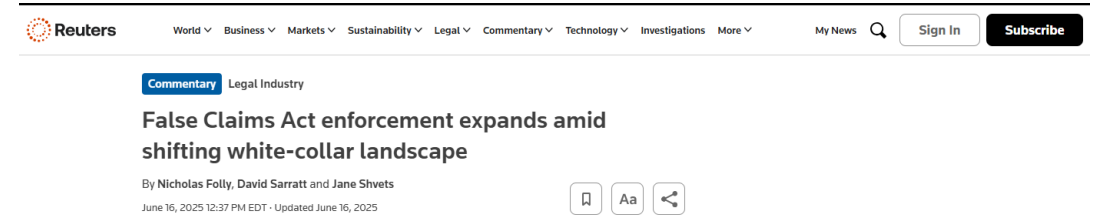
	<b>U.S. Department of Justice</b> Civil Division
<i>Office of the Assistant Attorney General</i>	<i>Washington, DC 20044</i>
	June 11, 2025
<b><u>MEMORANDUM</u></b>	
<b>TO:</b>	All Civil Division Employees
<b>FROM:</b>	Brett A. Shumate Assistant Attorney General
	<b>BRETT SHUMATE</b> <small>Digitally signed by BRETT SHUMATE Date: 2025.06.11 12:27:50 -0400</small>
<b>SUBJECT:</b>	<u>Civil Division Enforcement Priorities</u>

Promises “aggressive[]” investigation and pursuit of FCA cases involving:

- Civil rights law violations
- Billing of federal programs for “impermissible services”

# 2025 Will be a Banner Year for FCA Enforcement

Jan. 1 – June 30,  
2025: \$3.8 billion in  
FCA settlements and  
judgments



Since mid-year:  
~\$488 million more in  
settlements and  
judgments

# DEI and Civil Rights Enforcement



## DOJ's Civil Rights Fraud Initiative

- On May 19, 2025, DOJ announced **the “Civil Rights Fraud Initiative.”**
  - “The Initiative will utilize the False Claims Act to . . . pursue claims against any recipient of federal funds that **knowingly violates the civil rights laws.**”
- The Civil Fraud Section at DOJ is leading the Initiative in coordination with the Civil Rights Division. Each U.S. Attorney’s Office is required to identify a team of AUSAs to work on these cases.
- Those sections are directed to coordinate with the Criminal Division, as well as other federal agencies, including the Departments of Education, Health and Human Services, Housing and Urban Development, and Labor. Notably, the Department of Defense is not identified.

## Theories of Liability

- DOJ is focused on “**false certifications,**” both express and implied.
- Most federal contractors have certified that they do not engage in discrimination based on sex or race.
- Others certify that they are in compliance with federal civil rights laws.
- Agencies have started asking for new certifications that contractors are not operating “**unlawful DEI programs**” or that they are not operating DEI programs that are “**inconsistent**” with federal civil rights laws.

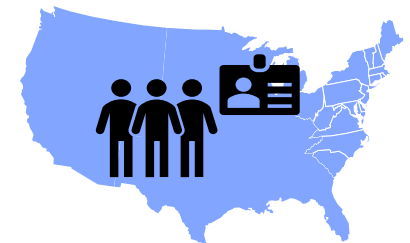
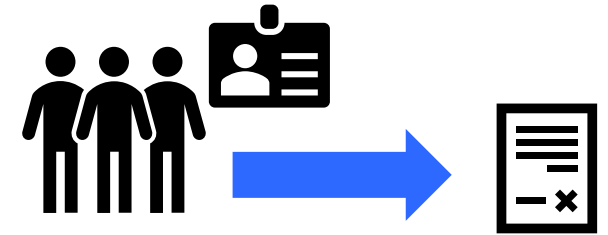
## DOJ Is Already Pursuing DEI Investigations

- On May 1, DOJ intervened in a *qui tam* action against several Medicare Advantage insurers and brokers, alleging in part that some of the defendants promised in their contracts to “**comply with applicable anti-discrimination laws**.”
  - DOJ alleges that the insurers falsely certified their compliance with the federal civil rights laws, as well as specific HHS requirements prohibiting discrimination against the disabled in the Medicare Advantage Program.
- DOJ has also started DEI-related FCA investigations, having issued several Civil Investigative Demands (CIDs).
  - Likely a mix of *qui tam* and DOJ-initiated matters.
  - No resolutions yet; investigations are in early stages.

# Immigration Fraud

## Beyond DEI: Immigration- Related Theories

- Federal contractors are required to verify their employees' employment eligibility in the federal E-Verify database.
- FAR 52.222-54 requires use of E-Verify for two categories of employees:
  - All employees who will be assigned to the relevant government contract (new hire or otherwise); and
  - All new employees working within the United States (whether or not assigned to the relevant government contract).
- FAR 52.222-54 applies to virtually all government contracts that exceed \$150,000.



## Immigration Enforcement Cases

**Shipbuilding company**  
**\$1.025 million**  
**(January 2025)**

Alleged failure to comply with FAR 52.222-54 by **“knowingly employ[ing] ineligible workers”** to perform the contract.

**Drydock and ship  
repair company**  
**\$4 million**  
**(September 2025)**

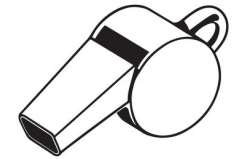
- Alleged **awareness that its subcontractors were employing unauthorized workers** who performed work on United States ships in violation of the E-Verify requirements.
- The company separately pled guilty to a criminal charge of knowingly hiring and continuing to employ unauthorized workers in the United States.



# Trade and Customs Enforcement

## DOJ Trade Fraud Task Force

- On August 29, 2025, the DOJ launched the **Trade Fraud Task Force** that will coordinate efforts between DOJ's Civil and Criminal Divisions and the Department of Homeland Security (DHS) to pursue customs and tariff fraud cases.
- The Task Force will advance the President's "**America First Trade Policy**" by pursuing civil customs fraud cases under the False Claims Act and Tariff Act, and criminal prosecutions.
- **DOJ is actively encouraging whistleblowers** to report alleged customs violations to the Criminal Division's Corporate Whistleblower Program and to file lawsuits under the *qui tam* provisions of the FCA.
- In particular, DOJ welcomed "referrals and cooperation from the domestic industries that are most harmed by unfair trade practices and trade fraud."



## Tariff Evasion Can Constitute a Reverse False Claim

### Obligation

Courts have held that “[t]he requirement to pay customs duties constitutes an **obligation to pay money to the government.**” *U.S. ex rel. Taylor v. GMI USA Corp.*, 2025 WL 815406, at \*10 (S.D.N.Y. 2025).

### Falsity

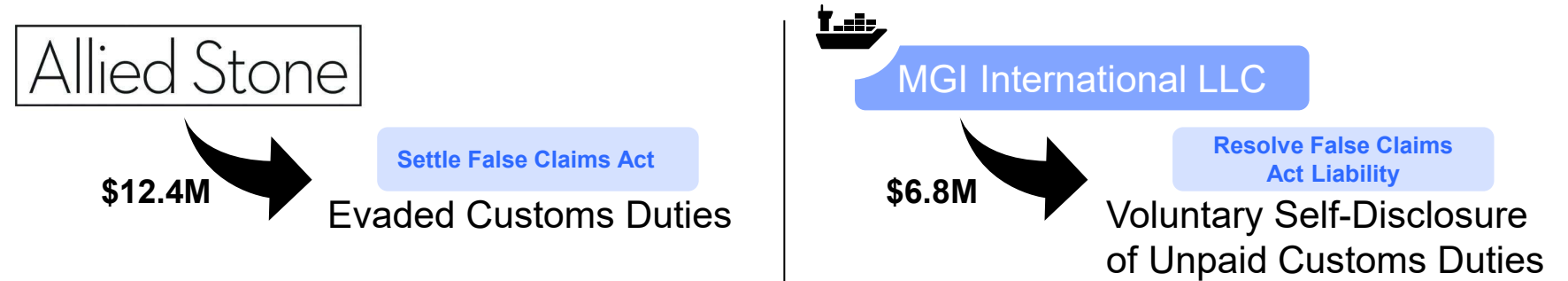
“The statutory text, legislative history, and policy rationale [of] the regulatory scheme all lead to one conclusion: **reverse false claims liability may attach as a result of avoiding marking duties.**” *U.S. ex rel. Customs Fraud Investigations, LLC. v. Victaulic Co.*, 839 F.3d 242, 256 (3d Cir. 2016).

### Materiality

At least one court has concluded it is **“undisputed”** that “tariff classification codes, duty rates, and duty amounts owed . . . are **material to Customs.**” *U.S. ex rel. Taylor v. GMI USA Corp.*, 2025 WL 815406, at \*14 (S.D.N.Y. 2025).

## Overview of DOJ Enforcement

- Since 2011, there have been over **40 DOJ resolutions** in customs cases under the FCA, with over **\$250 million in total recoveries**.
- The settlement amounts range **from \$275K to \$45 million**.



- FCA resolutions in the customs/tariffs space typically involve at least one of three types of unlawful conduct:
  - **Misrepresentation of Country of Origin for Imported Products;**
  - **Misclassification of Imports;**
  - **Undervaluation of Imports.**

## Both DOJ and Relators Have Pursued FCA Trade Cases in Court

- In January 2025, **DOJ intervened in a *qui tam* lawsuit** originally filed in 2016 against U.S.-based Barco Uniforms, Inc. and a number of China-based suppliers.
  - DOJ alleged a double-invoicing scheme.
- In June 2025, **the Ninth Circuit affirmed a \$26 million judgment in a declined case against U.S.-based Sigma Corp.**
  - The relator alleged improper avoidance of 182.9% antidumping duties for Chinese-made welded outlets.
  - **The jury's award comprised \$24.2 in damages (post-trebling) and \$1.8 million in civil penalties.**
  - The relator—Island Industries, Inc.—is a direct competitor of Sigma.

# Cybersecurity Fraud

## DOJ's Cybersecurity FCA Theories Focus on Compliance and Certifications with Standards

- DOJ has exhibited an increased focus on whether companies have **implemented** controls they say they have in place, and whether those controls can be **substantiated**.
- Potential DOJ theories and allegations include knowingly:
  - **Failing to meet** government-imposed cybersecurity standards and requirements;
  - **Misrepresenting** company's own security controls or capabilities, whether or not government-required; and
  - **Failing to report** known cyber incidents.



## 2025: Notable Cybersecurity- Related Settlements

Life sciences  
corporation  
\$9.8 million  
(July 2025)

- Alleged sale to federal agencies of genomic sequencing systems containing **cybersecurity vulnerabilities**.
- Alleged false **representations of compliance** with cybersecurity standards.

Defense contractor  
and private equity firm  
\$1.75 million  
(July 2025)

- Alleged **failure to implement** required cybersecurity controls.
- Alleged **failure to limit access** to sensitive defense information.

Research institution  
\$875,000  
(September 2025)

- Alleged **failure to meet cybersecurity requirements** in connection with Air Force and DARPA contracts.
- Alleged submission of false summary-level cybersecurity assessment score to DoD.



## CMMC is Finally Here

- DoD's Final Rule Assessing Contractor Implementation of Cybersecurity Requirements went into effect **November 10, 2025**.
- The Rule implements the DoD Cybersecurity Maturity Model Certification Program ("CMMC") and has a **three-year implementation period**.
- Based on CMMC level, companies can undergo:
  - **Self-assessment (Level 1 and some Level 2);**
  - **Third-party assessment (Level 2); or**
  - **DoD assessment of cybersecurity standards.**
- Companies must **post the results** of their self- or third-party assessments to the Supplier Performance Risk System ("SPRS") ***before securing or extending performance under an award and must maintain status for life of contract.***

# Procurement Fraud and Bid Rigging

## Procurement Fraud Enforcement Continues

- The first half of 2025 produced multiple eight-figure settlements with government contractors alleging violations of requirements for the disclosure of cost or pricing data.
  - In May 2025, L3 Technologies, Inc. settled for **\$62 million** for a TINA violation.
  - In January 2025, Lockheed Martin settled for **\$29.7 million** for a TINA violation.
  - In April 2025, DynCorp settled for **\$21 million** for overcharging pass through costs.
- On November 6, 2025, the Department of the Treasury launched a **comprehensive audit** of all contracts and tasks orders awarded under preference-based contracting across the Treasury Department and its bureaus, totaling approximately \$9 billion.
  - This audit will examine potential misuse of the **Small Business Administration's 8(a) Business Development Program** and other preference-based contract initiatives.
  - The administration is focusing on “pass through” arrangements, in which larger small businesses retain fees for minimal participation while subcontracting most of the work to larger companies.

*“As the Trump Administration zeroes in on fraud, waste, and abuse, this Office will continue to seek settlements with outside entities that are taking advantage of their U.S. government contract by either not providing what they promised or misusing the funds in other ways.”*

--United States Attorney's Office (District of Columbia)

## Bid Rigging Enforcement Is Returning

- DOJ has been actively using **the Procurement Collusion Strike Force (“PCSF”)**, an Antitrust Division program that was created under the first Trump Administration.
  - As of September 30, 2025, the PCSF has opened **195 investigations**, obtained over 75 guilty pleas and trial verdicts, and achieved **over \$70 million in fines and restitution**.
- DOJ’s recent settlement agreements and guilty pleas demonstrate that the current administration is interested in prosecuting bid rigging as a source of procurement fraud.
  - In September, 2025, DOJ announced a **\$3.3 million settlement** with Berg Companies, Inc. to resolve bid-rigging FCA after a *qui tam* action. The settlement awarded two whistleblowers over \$500,000 in recovery.
  - In January, 2025, DOJ obtained **guilty pleas from four defendants** in connection to big-rigging of the sale of IT products and services to the federal government. It stated that these pleas were part of a larger push to investigate fraudulent IT procurement practices.
- The Trump Administration’s emphasis on procurement fraud is consistent with its DOGE initiative and mission to reduce fraud and waste in the federal government.

# Upcoming December Programs

## 2025/2026 White Collar Webcast Series

Date and Time	Program	Registration Link
Tuesday, December 9, 2025 9:00 AM – 10:30 AM PT 12:00 PM – 1:30 PM ET	<b>Protecting Your Executives – Enforcement Against Individuals</b>  Presenters: Nicola Hanna, Jordan Estes, Douglas Fuchs, Dani James, Michael Martinez	<a href="#">Event Details</a>
Thursday, December 11, 2025 9:00 AM – 10:00 AM PT 12:00 PM – 1:00 PM ET	<b>Navigating DOJ’s M&amp;A Safe Harbor: Policy, Practice, and Strategic Implications</b>  Presenters: Patrick Stokes, Matt Axelrod, Michael Farhang, Alexander Fine	<a href="#">Event Details</a>





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