

The First 100 Days

Administrative Action

Most presidents spend the first days of their administration reversing the policies of their opposite party predecessor and laying the groundwork for their own policies with a series of executive orders. President Trump is now in the historically rare position of being able to reinstate and expand on his own policies from his first term as the first president since Grover Cleveland to win a non-sequential second term in office.

We expect that President Trump will focus the first 100 days on executive actions that advance his top campaign priorities related to immigration policy, tariffs and rolling back Biden administration policies and offices related to social (e.g., diversity, equity & inclusion (DEI)) policies and environmental issues. Similarly, President Trump likely will prioritize government-wide deregulatory reform, much like the first 100 days of his prior presidency. He is also likely to take action to reform the federal civil service, such as immediately establishing a Government Efficiency Commission.

Of notable contrast to President Trump's first term, the incoming administration is better prepared for the transition. Outside groups affiliated with the former President have stepped up efforts to develop lists of potential political appointees and inform early policymaking for the second Trump administration to implement on day one.

These preparations are intended to empower political appointees to hit the ground running in implementing President Trump's second-term agenda. While the nature and content of the executive orders in his first 100 days are expected to track the priorities that President Trump emphasized during his campaign, they actually may be less sweeping where such campaign promises require congressional action. These proactive actions also may drive a more successful first 100-day

administrative action plan compared to President Trump's first 100 days in 2017.

- **Immigration.** Since his first run for President almost a decade ago, President Trump has consistently campaigned on immigration. He has pledged in the first 100 days of his second administration to begin “the largest deportation operation in American history,” to “end every open border policy of the Biden administration,” and to “restore the Trump travel ban on immigration from terror-plagued countries.” This builds on the first 100 days of his first term when President Trump issued executive orders to begin the family separation policy, end funding for so-called sanctuary jurisdictions, establish an office to support victims of crimes committed by undocumented immigrants and expedite the removal of undocumented immigrants, among other immigration policies. A new set of executive orders would revive and expand these policies, fulfilling his most prominent campaign promises.
- **Trade.** President Trump is likely to move quickly in his first 100 days to fulfill his various campaign pledges to raise tariffs on goods from all sources, goods from China and goods from Mexico made with Chinese investment. Specifically, this may include invoking the International Emergency Economic Powers Act (IEEPA) or Section 122 of the Trade Act of 1974 to establish a “universal baseline tariff” on goods from all sources, increasing tariffs on imports from China under Section 301 of the Trade Act, suspending the agreements previously reached with the European Union (EU) regarding Section 232 “national security” tariffs on steel and aluminum and reimposing those tariffs on imports from the EU and/or starting new Section 232 or Section 301 investigations into sensitive strategic sectors like autos and/or electric vehicles. While in official

campaign documents President Trump has proposed a 60 percent tariff on goods from China and a 10 percent tariff on goods from all sources, those figures have fluctuated and he also has said that a tariff can serve different purposes, either as leverage to force companies to relocate operations to the U.S. or simply collect revenue without changing behavior. As his first term in office demonstrated, tariffs also can serve as leverage in early negotiation stages to reach some kind of deal. Regardless of the ultimate end reached, President Trump is expected to launch his second term with a raft of new tariffs.

- **Focus on Social Issues.** In his first 100 days, President Trump likely will take action on social issues, such as reinstating from his first term the Mexico City policy, which blocked federal funding for nongovernmental organization (NGO) abortion counseling and services. He also likely will seek to implement campaign promises on cutting federal funding for schools and for health care providers that offer gender-affirming care.
- **Reversing Other Biden Administration Policy.** President Trump also likely will take early action to reverse Biden administration energy and environmental policies, such as the pause in liquefied natural gas (LNG) export licensing and to promote domestic oil & gas drilling and pipeline expansion. President Trump also is likely to seek through executive action to issue a freeze on Biden administration regulations, such as the artificial intelligence (AI) executive order, which President Trump says censors free speech. He also may seek federal workforce reforms, possibly reissuing an executive order from his first term to re-classify career civil servants as political appointees thereby expediting federal agency personnel hiring and firing. He may also seek to reinstate the executive order banning diversity training, which President Biden revoked on his first day in office.

Legislative Outlook

Congress's ability to pursue legislative priorities in the first 100 days may be impacted by the progress made on FY 2025 appropriations and/or new deadlines set by another continuing resolution (the current one is set to expire December 20, 2024).

The first days of any new Congress, particularly if the same party as the President's controls the Senate and House majority, are typically focused on confirming the President's most important cabinet nominees. In President Trump's first term, a Republican-controlled Senate confirmed his entire cabinet within the first 100 days, and his Secretaries of Defense, Education, Health & Human Services, Homeland Security, State, Transportation and the Treasury within the first 25 days. These confirmations only require a simple majority and under a GOP-majority Senate, are expected to move rapidly through confirmation, with some possible timing variations based on the specific nominees the President puts forward.

Aside from nominations, a government under unified Republican control likely will spend the first 100 days on President Trump's top priorities, like developing and seeking to pass a restrictive border enforcement and funding bill akin to the Secure the Border Act (H.R. 2), which House Republicans advocated in the current Congress. Congressional Republicans also will lay the groundwork in committee and across their respective conferences for a comprehensive tax reform bill prior to the Tax Cuts and Jobs Act (TCJA) expiring at the end of 2025. A unified Republican government also may consider the budget reconciliation process for expediting tax reform.

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