



Championing public policy so that every young child is healthy and ready to learn by age 5.

July 14, 2025

U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Re: Responding to Request for Information (RFI): Ensuring Lawful Regulation and Unleashing Innovation to Make America Healthy Again

To whom it may concern:

Groundwork Ohio's mission is to champion high-quality early learning and healthy development strategies from the prenatal period to age five, that lay a strong foundation for Ohio kids, families, and communities. We listen to, engage and mobilize families, early childhood professionals, community leaders and policymakers to promote data-driven and evidence-based early childhood policies. We wish to convey our deep concern for the deregulatory framework proposed that has the potential to dramatically undermine the safety and quality of key early childhood programs and services.

In Ohio, one in five children, ages 0-5, live in poverty (below 100% of the Federal Poverty Level). Without access to the programs overseen by HHS that enable low-income children to access health care, nutrition, housing, and early learning experiences, the children who start behind are more likely to stay behind.

The "10-for-1" approach outlined in Executive Orders 14192 and 14219 creates a dangerous and false equivalency between all regulations, failing to assess the individual cumulative benefits to children and families. Every public dollar spent during early childhood results in a 13% return on investment (ROI),ⁱ which makes the cost assessments of the proposed framework incomplete and short-sighted, ignoring the long-term ROI in child health, early education, and future outcomes.

The following outlines our opposition to the weakening of regulations that:

- Ensure access to health coverage and care,
- Guarantee safe and developmentally appropriate child care,
- Support family economic stability,
- Promote early learning and school readiness.

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Preservation of Key Regulatory Protections

A. Medicaid access for children, pregnant, and postpartum individuals

We strongly oppose any rollbacks that result in changes to Medicaid eligibility, EPSDT requirements, postpartum coverage, or reporting rules that ensure transparency and accountability across our health systems.

Covering nearly half of all births in Ohio and nearly 400,000 young children under age 5, Medicaid is truly foundational to improve health and well-being outcomes for Ohio families. Access to consistent health coverage during early childhood is a key strategy to improve lifelong outcomes. Evidence suggests Medicaid access for low-income children and families reduces infant and maternal mortality, improves kindergarten readiness and school performance, and promotes higher lifetime earnings.

B. Health and Safety Standards for Early Childhood Education

We strongly oppose any repeal of performance or standards related to Head Start, Early Head Start, or child care programs that place the safety of infants and children at unnecessary risk. Deregulation, in the form of changes to child-staff ratio standards, group size limits, or health safety regulation enforced through the Child Care Development Block Grant (CCDBG), threatens to diminish safety and quality within early learning programs. These standards are essential to improve child safety, promote developmentally appropriate environments, and provide high-quality child care.

Furthermore, these quality and safety measures are an important strategy to help parents remain in the workforce, improving broader economic benefits to states and communities, and supporting economic security for families.ⁱⁱ

C. Nutrition Programs for Infants and Toddlers

We urge you to safeguard eligibility rules, breastfeeding promotion standards, and reporting obligations that track program reach and effectiveness for the Women, Infants, and Children (WIC) program.

29.5% of Ohio children ages 0-5 live in households that cannot always afford nutritious meals.ⁱⁱⁱ WIC participation is linked to healthier birth outcomes, improved child nutrition, and improved development, and is essential to combat food insecurity and promote positive growth for low-income children who lack other sources of nutritious foods.

D. Housing and Homelessness Prevention for Families with Young Children

We urge you to uphold regulations tied to HHS-administered homelessness prevention and housing programs for families tied to the Temporary Assistance for Needy Families block grant (TANF).



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Housing stability in early childhood is a predictor of lifelong health and educational attainment. When families with young children are financially stable, with consistent access to food, health care, and affordable housing, they are better able to care for and plan their future.^{iv}

Response to RFI Questions

Question 1: What HHS regulations meet one or more of the seven E.O. 14219 criteria?

None of the child- and family-serving regulations cited above meet these criteria. Repealing them would cause demonstrable harm to public health and violate the statutory intent of programs such as Medicaid, Head Start, and CCDBG.

Question 2: What regulation should we reconsider to help reverse chronic disease?

Investment in programs that support strong child development is an effective public health strategy that can meaningfully reduce lifelong chronic disease risk. This is shown in evidence across programs including WIC, Medicaid, and early intervention that are foundational to preventing chronic illness for children born into low-income households.

Question 3: Are there regulations that impede access to care or services?

Current regulations are essential to ensure access to care or services in the context of child- and family-serving systems. Removing regulatory safeguards is not the way to improve efficiency.

Question 4: What alternative approaches could reduce burden?

Rather than vast repeals, data-sharing systems and universal applications across benefit programs could streamline administrative burdens and enhance efficacy.

Conclusion

Any changes to regulations must be transparent, grounded in evidence, and focused on the well-being and safety of children, families, and those who serve them. We respectfully urge HHS to uphold its responsibility to support programs and regulations that offer young children a safe and healthy start in life. Specifically, we request you:

- Reject any deregulatory action that undermines statutory mandates to promote maternal and child health, early education, and family well-being.
- Listen to the experiences of families and frontline providers in any regulatory review.
- Conduct robust cost-benefit analysis that accounts for long-term child development and public savings, not just short-term administrative costs.
- Strengthen accountability and data collection to ensure programs are effective.



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Thank you for your consideration and please feel free to contact me directly at lgutierrez@groundworkohio.org with any questions about our comments.

Warm personal regards,



Lynanne Gutierrez
President & CEO
Groundwork Ohio

ⁱ Garcia, J., Heckman, J., et al. (2016). The life-cycle benefit of an influential early childhood program. The University of Chicago, Department of Economics. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2884880

ⁱⁱ Center for American Progress. (2024). Providing affordable, accessible, and high-quality child care. <https://www.americanprogress.org/article/playbook-for-the-advancement-of-women-in-the-economy/providing-affordable-accessible-and-high-quality-child-care/>

ⁱⁱⁱ Groundwork Ohio. (2025a). Early Childhood Data Dashboard. [2025EarlyChildhoodDashboardDIGITAL2.pdf](#)

^{iv} Groundwork Ohio. (2025b). Early Childhood Data Dashboard. [2025EarlyChildhoodDashboardDIGITAL2.pdf](#)



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