



July 13, 2025

The Honorable Robert F. Kennedy Jr.
Department of Health and Human Services (HHS)
Office of the Secretary
200 Independence Avenue S.W.
Washington, D.C. 20201

RE: Request for Information (RFI): Ensuring Lawful Regulation and Unleashing Innovation To Make America Healthy Again; Docket: AHRQ-2025-0001

To whom it may concern,

We are writing today in response to the *Request for Information (RFI): Ensuring Lawful Regulation and Unleashing Innovation To Make America Healthy Again*. We seek to offer our perspective and insights based on our work on programs administered by HHS, including child care and early education programs run by the Office of Child Care and the Office of Head Start, Medicaid, Affordable Care Act Marketplaces, and the Children's Health Insurance Program

The Center for Law and Social Policy (CLASP) is a national, non-partisan, anti-poverty organization that has advocated for policy solutions that support the needs of people with low incomes for over 50 years. CLASP develops practical yet visionary strategies for reducing poverty, promoting economic security, and advancing racial equity. CLASP works at the federal, state, and local levels and has deep expertise across programs administered by HHS. CLASP has particular expertise in child care and early education, postsecondary education, Medicaid, and job quality policies, including those that impact the early childhood education workforce.

With this expertise in mind, we write to urge you to consider the following when navigating and considering information gathered through this request:

1. Acknowledge and consider the importance and value of regulations in ensuring people's health, safety, and well-being.
2. Ensure public comment opportunities are upheld and encouraged at every step of the process.
3. Ensure decisions are made with the people who will be most impacted—children, families, and child care and health care providers—included at the center.

Acknowledge and consider the importance and value of regulations in ensuring people's health, safety, and well-being.

Federal regulations are critical for the effective implementation of federal laws. They ensure uniformity and consistency in the laws' application; clarify statutory ambiguities and provide essential guidance to federal grant administrators and recipients; and provide clear guardrails for oversight and accountability.

Regulations have become a prominent part of how the executive branch governs because they can address complex, evolving challenges in the implementation of statutes that legislators may not have been in a position to reasonably predict, or may not have had the subject matter expertise to legislate. Regulations have also become crucial in the operation of programs and policies that impact young children and their families, particularly as Congress has dedicated more resources to this population over the past half century.

Any reform must be grounded in principles that advance learning, health, and stability; protect child and family well-being; preserve program integrity; and ensure accountability for public funds.

Ensure public comment opportunities are upheld and encouraged at every step of the process.

We commend the Administration's use of notice-and-comment as a tool to gather public input before enacting any regulatory reforms. This process of notice-and-comment, which has been a hallmark of the regulatory process in the U.S. Department of Health & Human Services, must remain robust and transparent. To that end, the Administration should ensure that all comments submitted as a part of this RFI are made publicly available, so that commenters and any other interested party may see what types of recommendations the Administration may consider. The comment period should also provide sufficient time for the public to draft meaningful responses—as the RFI has through the 60-day comment period. Again, transparency and pathways for meaningful engagement are critical features of the notice-and-comment process and promote mutual trust.

Ensure decisions are made with the people who will be most impacted—children, families, and child care and health care providers—included at the center.

CLASP has done work in recent years to elevate data equity and has highlighted the critical inclusion of equitable community engagement strategies in gathering information and data. These strategies include centering the experiences and expertise of those who are most directly impacted by—yet most often excluded from—the processes to collect and

analyze data as well as the resulting policies and resources determined by those data. We encourage you to ensure that feedback is proactively gathered from the people who will be most impacted by these potential shifts: children, families, and child care and health care providers.

In our work, we identified best practices for inclusive and equitable community engagement, especially in data collection. While the identified best practices are targeted specifically at equitable data collection and survey development, many of the practices are relevant for this RFI and any proposed changes that may come from it, and we encourage you to engage in these practices throughout the process:

- Interrogate whose knowledge (i.e., evidence, lived experiences, and perspectives) is considered central to the process, and whose knowledge can be viewed as secondary or supplemental;
- Create space and shift power to allow those who are most directly impacted to lead in defining the problem, designing the solutions, and during implementation;
- Involve directly impacted people/communities--particularly those who have been mislabeled as difficult to reach—not just as a source of information gathering, but also in developing data strategies including constructing survey questions, creating outreach strategies, interpreting and organizing qualitative responses, etc.;
- Engage in authentic conversations with directly impacted community members to capture their perspectives;
- Respectfully partner with community-based connectors and organizing entities to build trust and authentic reciprocal relationships; and
- Ensure that the results of the research can be accessed by and are useful to the communities where the research was collected and those who may be directly impacted by policy changes based on that research.

For a deeper discussion of these issues, CLASP recommends our 2021 paper, [Shaping Equitable Early Childhood Policy: Incorporating Inclusive Community Engagement Frameworks into Expanded Data Strategies](#), by Alycia Hardy and Alyssa Fortner. Although this paper was written broadly, the overall framework and many of the recommendations and resources included are relevant for the purposes of this RFI.

Thank you for considering these comments. We would be glad to further discuss these recommendations with you. If you have any questions, please contact Stephanie Schmit at sschmit@clasp.org.