



**Lynanne Gutierrez**  
President & CEO, Groundwork Ohio  
lgutierrez@groundworkohio.org  
mobile: 614-204-6106  
4041 N. High St., Suite 204  
Columbus, Ohio 43214

July 22, 2024

U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

**Re: Request for Information on Identifying and Tracking Data Related to Early Childhood Education Providers (Document Number 2024-13446)**

To Whom It May Concern:

Groundwork Ohio appreciates the opportunity to comment on the U.S. Department of Education's Request for Information (RFI) regarding the potential expansion of Public Service Loan Forgiveness (PSLF) for professionals in early childhood education (ECE) settings. We commend the Department's efforts to support ECE professionals, who are vital to the development and growth of young children.

Groundwork focuses on ensuring that every pregnant mother, baby, toddler, and young child in Ohio has the resources and opportunities for a strong start. Our statewide policy and advocacy efforts aim to support young children during the critical prenatal period through age five. By aligning strategies with diverse stakeholders, we work to establish equitable policies that help every young child reach their full potential.

The importance of high-quality early childhood education cannot be overstated. During the early years, children's experiences and environments profoundly influence their health, development, and life trajectory. Early childhood educators play a crucial role in providing these foundational experiences. However, in Ohio, the average child care worker earns \$15 an hour, while the average cost of attendance for a student living on campus at an in-state public four-year institution is \$27,146 per year, totaling \$108,584 over four years. These financial realities make it nearly impossible for early childhood educators to increase their skills and repay their student loans, despite the critical nature of their work.

Quality early childhood education requires qualified and well-trained educators. However, the ECE landscape comprises for-profit, non-profit, private, and public entities. Educators often move between these sectors along with out of the sector entirely, all in search of better financial opportunities. They should not be penalized for seeking employment that offers greater financial security. It is imperative that all early childhood educators, regardless of their employer's tax status, have access to PSLF. This will help retain a qualified workforce dedicated to nurturing our youngest learners.

Ohio has demonstrated its capability to implement changes such as the proposed PSLF expansion effectively. During the pandemic, Ohio quickly established and administered "Hero Pay" to qualified early childhood educators through the Ohio Child Care Resource and Referral Agency (OCCRRA)'s Ohio Professional Registry. This program provided additional payments to early childhood educators working in licensed child care programs. The swift and efficient implementation of this initiative highlights Ohio's readiness to manage similar programs, including PSLF. We recommend using Ohio Professional Identification Numbers (OPIN) to identify educators eligible for PSLF, leveraging existing infrastructure to ensure timely and accurate administration.

Expanding PSLF to include early childhood educators, irrespective of their employer's tax status, would significantly impact the ECE workforce, which is predominantly composed of women, including many women of color and immigrants. These educators, often underpaid, would benefit immensely from the financial relief provided by PSLF, thereby enhancing the quality of care and education.

**The ECE workforce is among the lowest-paid occupations in the country, despite the critical nature of their work. Expanding PSLF to include for-profit ECE employers would support a workforce that is essential to our nation's future.**

**Regarding the Department's specific questions:**

1. While EINs have been a reliable identifier for non-profit employers, some for-profit ECE providers may not have EINs. The Department could consider using state-issued licenses or unique identifiers associated with licensure as alternative identifiers.
2. For determining the eligibility of for-profit ECE employers, a verification process involving state and local licensing agencies could be developed. This would ensure that all qualifying employers are accurately identified.
3. If HHS were to issue a Public Records Act request for a nationwide registry of EINs for ECE providers, state and tribal agencies should be able to collect this information or other useful identifiers. In Ohio, collaboration and data sharing between agencies, such as the Ohio Department of Youth and OCCRRA, can facilitate this process.
4. The collection of EINs, or other identification numbers, for licensed and regulated providers would require time and resources and adequate support and funding would be necessary to implement this process effectively. Ohio has proven its ability and infrastructure to implement this process in a seamless and efficient way.
5. Utilizing unique identifiers associated with licensure, such as OPINs, may be more practical and could streamline the eligibility determination process. This approach would leverage existing state and local systems, reducing the burden on providers and ensuring a more efficient process.

Groundwork Ohio supports the expansion of PSLF to include ECE workers to receive this support. Thank you for considering our comments and for your ongoing commitment to improving the lives of early childhood educators and the children they serve.

Sincerely,

A handwritten signature in black ink that reads "Lynanne Gutierrez". The signature is written in a cursive, flowing style.

Lynanne Gutierrez  
President & CEO  
Groundwork Ohio