

# The Great Dismantling

How One Year Of Executive Structural Deregulation  
Reshaped A Fractured Federation And The Public





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# Introduction

In 2025, the United States entered a new era of governance — not through expansion, but through retreat. Under President Trump’s second administration, **the federal government began the most extensive rollback of regulatory authority in modern history**. The goal was not merely to reduce bureaucracy, but to permanently reshape the role of Washington itself.

The Reagan revolution of the 1980s cut rules but preserved the machinery of government. President Trump’s second term went further. Through the **10-to-1 Executive Order, Zero-Based Regulatory Budgeting**, and the sweeping **One Big Beautiful Bill Act**, the administration deregulated or defunded much of the country’s oversight infrastructure: healthcare, environment, energy, finance, labor, and data. Agencies that once maintained national standards lost resources, leadership, and coordination. Enforcement slowed, data collection shrank, and **the connective tissue of the federal system began to come apart**.

This marked the beginning of what this report calls **The Great Dismantling**: a period of structural deregulation that redefined the American state. Deregulation loosened the rules that governed markets; defunding stripped the institutions that enforced them. Together, they produced not just a smaller government, but a weaker one — a federal system losing both its reach and reflexes.

As the center withdrew, **states, markets, and corporations rushed to fill the void**. California, New York, and Massachusetts built coalitions around clean energy, privacy, and consumer protection, effectively forming a parallel regulatory union. Texas, Florida, and Oklahoma moved in the opposite direction, expanding extraction, finance, and low-regulation manufacturing. The result was not chaos, but divergence: a country still functioning, yet increasingly governed by region, ideology, and capacity rather than shared national coherence.

The effects of **structural deregulation** rippled through every sector. Nonprofits, international development, civic organizations, and local governments — long dependent on federal partnerships and data — were forced to take on new responsibilities for safety, environment, and welfare, often without the infrastructure or legitimacy that national and global frameworks once provided.

**By the end of the year, the United States no longer operated under one regulatory logic.** Energy and

finance surged under lighter rules. Tech firms wrote their own frameworks for data and AI. Healthcare, labor, and environmental protections fractured. For businesses, nonprofits, and citizens alike, the rules now depended on geography — a return to something like pre-New Deal America, but with twenty-first-century complexity.

**This report describes a Fractured Federation: a nation under reconstruction — a system where old supports were removed faster than new ones could be built. Some regions improvised new scaffolding; others were left exposed. Across the map, deeper costs grew harder to ignore and the social contract that once bound Americans to a shared idea of governance began to erode.**





# Executive Summary

The story of Donald Trump’s first year of his second presidency is about his administration’s methodical effort to dismantle the modern regulatory state. This dismantling transferred risk from federal institutions to households, municipalities, the private sector, and ultimately to the public. This report documents the consequences of The Great Dismantling across seven sectors: Healthcare, International Development, Energy, Housing & Insurance, Chemicals & Manufacturing, Labor & Workplace Safety, and Finance.

Our findings are based on analysis of federal rulemaking records, state legislative activity, industry disclosures, news reporting, and key economic and public health indicators from January 20 through December 22, 2025, utilizing [Abstract’s](#) AI regulatory intelligence platform to track regulatory responses across all 50 states. These seven sectors were selected based on the scale of federal policy changes, breadth of population affected, and severity of documented impacts on health, safety, and economic security. Each sector was assigned a Human Impact Score on a scale of 1-20.



## Key Findings

- Healthcare (19/20):** Short-Term, Limited Duration Insurance expansion estimated 4.8 million in insurance coverage losses with premiums increasing 114%. These plans exclude 94% of adult immunizations, 71% of prescription drugs, and 100% of maternity coverage. 2025 saw 39 hospital mergers. Medicaid work requirements will take effect in 2027, with CBO projecting 5.2 million coverage losses by 2034—though historical precedent (9 million lost coverage in 2023-2024 due to paperwork alone) suggests actual losses may exceed projections.
- International Development (18/20):** USAID’s restructuring marked the largest rollback of U.S. development leadership in decades. 83% of programs (5,300+ of 6,200+) terminated, with only 294 of 10,000+ staff globally retained. \$27.7B in awards were ended, with 258, 161 global jobs lost (22,453 domestic). Human impact is in the millions and can be found within the sector deep dive.
- Energy (17/20):** Energy deregulation slashed permitting from 1-2 years to 14-28 days, saved industry \$2-2.4B via suspended GHG reporting through 2034, and fueled ExxonMobil’s 1.7 million bpd record alongside \$5B Kinder Morgan pipeline contracts—but drove air pollution affecting 156.1 million Americans (+25 million vs 2024) while undermining U.S. climate credibility as 82% LNG exports hit Europe amid China’s rising influence.
- Housing & Insurance (17/20):** 2025 NEPA streamlining slashed environmental reviews to 75pg/1yr EAs and 150pg/2yr EIS caps. \$107B global catastrophe losses (83% U.S.: \$40B LA wildfires, \$50B storms) drove 8% national premium hikes (LA 27%, CA 21%), squeezing households despite improved insurer 96.5 combined ratio. Major insurers State Farm, Allstate, and Farmers retreated from California, Florida, and Louisiana while federal policy accelerated development in high-risk areas.
- Chemicals & Manufacturing (17/20):** Under the Toxic Substances Control Act (TSCA), regulatory oversight has been reduced. The reporting deadline for PFAS chemicals was postponed from November 2025 to April 2026. PFAS contamination now impacts an estimated 172 million Americans, with 98% of waterways. In response, 19 states advanced PFAS legislation, effectively creating a “strictest-state floor” as national companies adopt California’s standards. Meanwhile, manufacturing output increased by 2.5%.
- Labor & Workplace Safety (15/20):** NIOSH funding was reduced by 85–90%. This cut effectively ended independent research that previously informed OSHA safety standards. The federal contractor minimum wage was lowered from \$17.75 to \$13.30, reducing annual earnings for 327,300 workers by an average of \$9,256—a total loss of about \$3B. Section 14(c), which allows subminimum wages for disabled workers, was preserved, affecting approximately 38,000 individuals. Protections for domestic workers were rolled back, impacting 3.7 million people, while the overtime pay threshold was reverted, affecting 4 million workers.
- Finance (14/20):** Regulators paused Basel III rules unleashing \$1.5T in stock buybacks (JPMorgan alone announced \$50B), while CFPB purged 67 guidance documents, dropped 18 cases, and brought back \$15B in late/overdraft fees. Crypto soared to a \$126K Bitcoin peak before crashing 30%, with \$939M lost to scams in just the first half. Banks reaped the benefits, insiders won big, households ate the cost and individual states (CA, NY) provided patchwork protection.
- The cumulative toll revealed a systematic transfer of risk. Across all sectors, deregulation delivered immediate financial gains to industry while transferring health, safety, and economic risks to households and workers.** The federal retreat fractured America’s regulatory architecture, producing the widest state-by-state disparities in protections since before the New Deal. Blue states became de facto national regulators in sectors like finance and chemicals, while red states embraced deregulation, widening regional divergence.

As 2026 begins, mounting public health costs and state-federal conflicts cast doubt on whether decentralized frameworks can deliver the stability and resilience national systems once provided—or whether The Great Dismantling has set consequences in motion that will take years to understand and decades to reverse.



# Methodology

## Overview

This report analyzes federal regulatory changes enacted during the first year of President Trump’s second term (January 20 - December 31, 2025) and their consequences across seven sectors that were impacted the most.

Our research combined policy tracking, outcome data analysis, and comparative state assessment to answer: ***What changed? Who was affected? How did states and industry respond?***

## Data Sources

Our findings draw from five primary sources:

- 1. Federal Regulatory Data:** Federal Register notices, agency enforcement records, executive orders, Congressional Review Act resolutions, and budget documents tracking staffing and appropriations changes.
- 2. State Responses:** Legislation, attorney general actions, emergency regulations, and gubernatorial directives across all 50 states.
- 3. Industry Disclosures:** Corporate earnings calls, SEC filings, merger announcements, and trade association reports documenting business responses.
- 4. Outcome Data:** Employment statistics (BLS), health indicators (CDC, state agencies), environmental monitoring (EPA), insurance data, consumer complaints (CFPB), and financial market performance.
- 5. News Reporting:** Systematic review of national, regional, and trade press, including reported interviews with agency officials, nonprofit leaders, industry executives, and affected workers. We did not conduct original interviews but synthesized perspectives from credible news sources.

## abstract AI Platform

Abstract’s regulatory & legislative intelligence platform enabled us to track public policy changes at scale across all 50 states and multiple federal agencies simultaneously.

The platform provides:

- **Continuous Monitoring:** Federal and state regulatory databases, legislative tracking systems, and public dockets.
- **Pattern Detection:** Cascading effects through state governments, corporate strategies, and civic institutions.
- **Volume & Scale:** Capable of rapidly processing and analyzing thousands of documents—far beyond manual review capacity within tight timeframes.

Abstract serves as an analysis, screening and pattern-detection tool; all findings were verified by human researchers through direct review of primary sources.

# Sector Selection

The seven sectors we chose to analyze in this report are Healthcare, International Development, Energy, Housing & Insurance, Chemicals & Manufacturing, Labor & Workplace Safety, and Finance. We chose these sectors based on three criteria:

- 1. Scale of federal policy changes: Magnitude of regulatory rollbacks through legislation, executive orders, guidance, or enforcement changes.
- 2. Breadth of population affected: Number of Americans impacted and criticality of affected systems.
- 3. Severity of documented impacts: Evidence of meaningful consequences for health, safety, economic security, or equity.

# Human Impact Score Methodology

To enable cross-sector comparison, we developed a Human Impact Score (4-20 scale) measuring negative consequences for individuals across four dimensions (each scored 1-5):

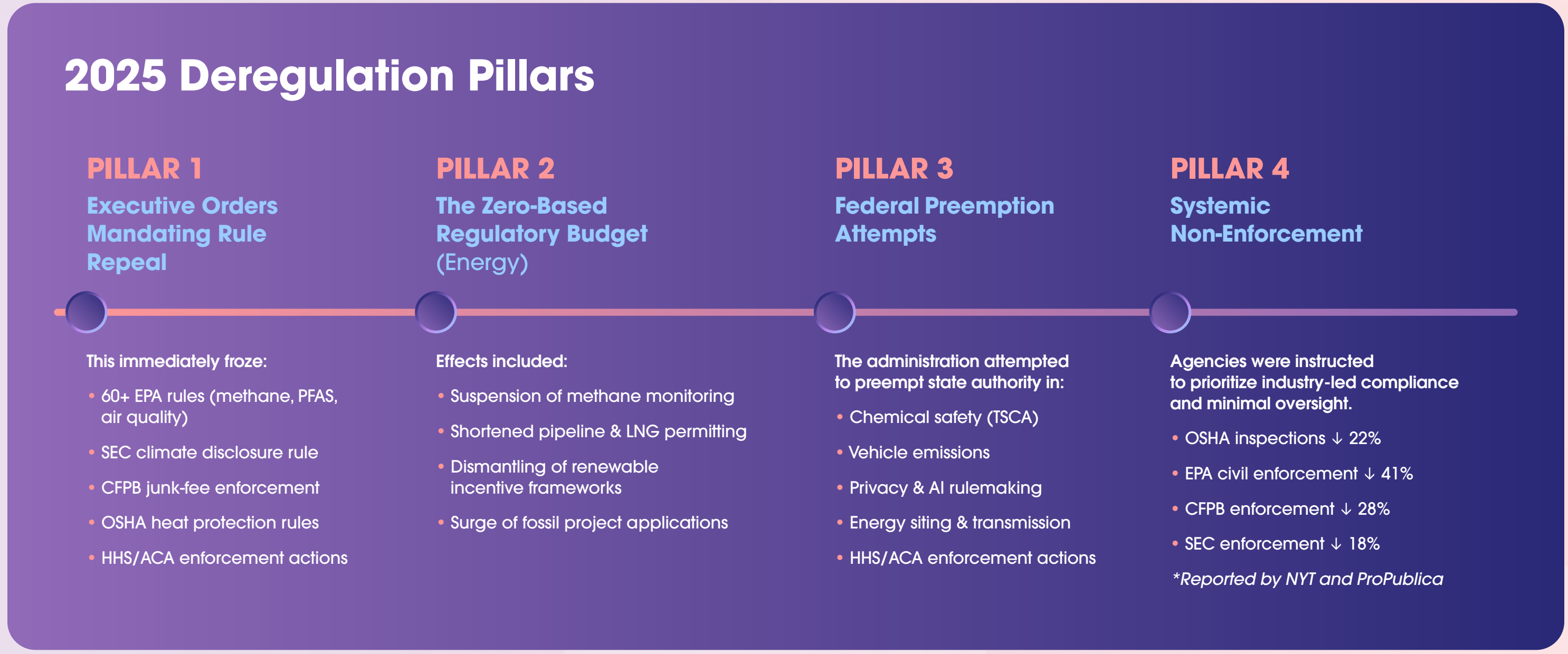
- **Jobs:** Employment levels, stability, wages, working conditions.
- **Consumer Cost:** Prices, access, affordability of essential services.
- **Health & Safety:** Environmental exposure, workplace risk, public health outcomes.
- **Equity:** Disproportionate burden on low-income, minority, rural, or vulnerable populations.

*\*Higher scores indicate more severe harm.*

# Scoring Process

For each sector:

1. Identified major deregulation actions.
2. Mapped actions to outcome data (jobs, coverage, prices, accidents, emissions, equity gaps).
3. Estimated directional magnitude (low=1, moderate=2-3, high=4, severe=5) for each dimension based on 2025 data, enforcement trends, and credible reporting.
4. Summed dimensions to calculate total scores (max 20).
5. Cross-checked against scale of affected population, legal durability, and geographic scope.



# Sector Deep Dives



# Healthcare: The Human Cost Of Deregulatory Action

Human Impact Score: 19/20

Per the measurable effects on coverage, prices, patient safety, and access, all of which are linked to mortality, we've deemed healthcare to be the most consequential domain of deregulation in 2025. This year, Centers for Medicare & Medicaid Services (CMS), United States Department of Health and Human Services (HHS), and The Federal Trade Commission (FTC) rolled back the broadest set of health regulations in more than a decade. At the same time, Congress allowed enhanced Affordable Care Act (ACA) subsidies to lapse, raising premiums and out-of-pocket exposure for millions. The sector scored 19/20 on human impact—the highest across industries—reflecting robust evidence that insurance instability and diminished oversight correlate with increased cases of avoidable illness and premature death.

## Market Volatility And The Resurgence Of Medical Debt

Enhanced ACA subsidies expired on December 31, 2025, causing premiums to more than double for many enrollees. [KFF projects that subsidized enrollees will see annual premium payments increase by 114% on average—from \\$888 to \\$1,904.](#)



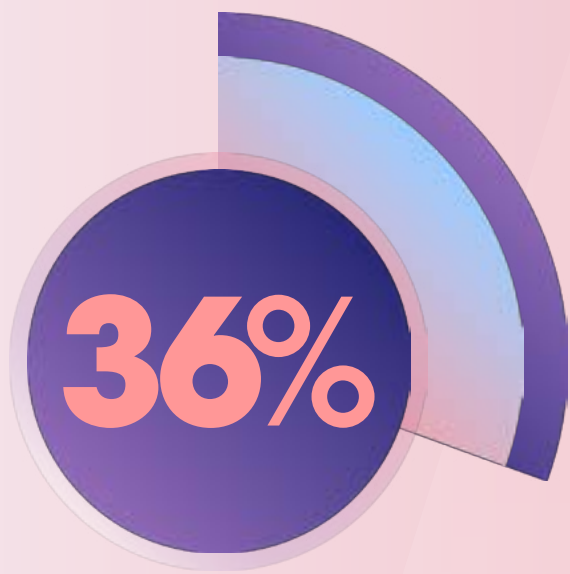
Urban Institute Analysis:

4.8M

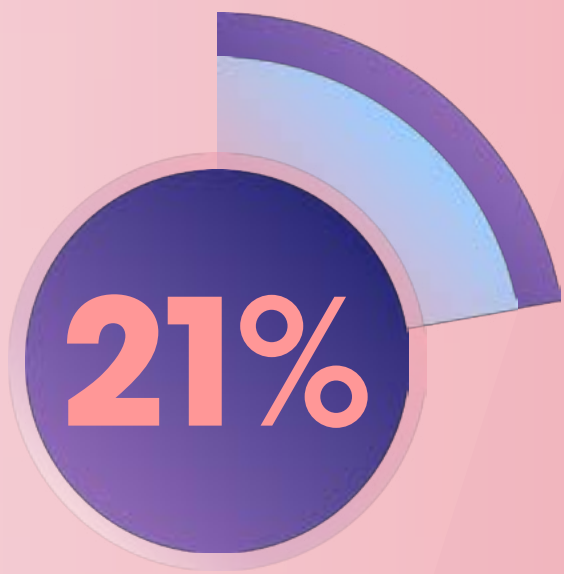
people will become uninsured as a result of the ACA subsidy expiration

The Consumer Financial Protection Bureau’s (CFPB) proposed reform aimed at boosting credit scores and access to credit by barring lenders from using it for credit decisions would have removed medical debt from credit reports—[eliminating an estimated \\$49B in outstanding medical bills for 15 million Americans](#). Following a change in administration, the new acting Director of the CFPB, appointed by President Trump, reversed the agency's position and invalidated its own rule, leaving millions vulnerable to medical debt impacting their credit scores and access to credit.

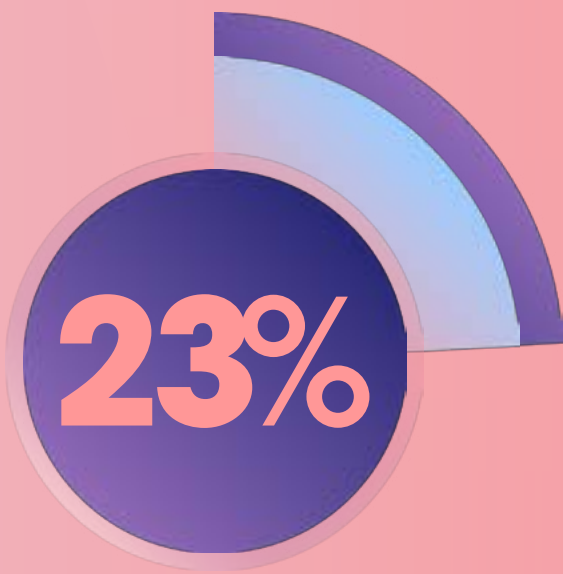
## Medical Debt Data (2024)



Of Us Households Had Medical Debt



Had A Past-Due Medical Bill



Were Paying A Medical Bill Over Time To A Provider

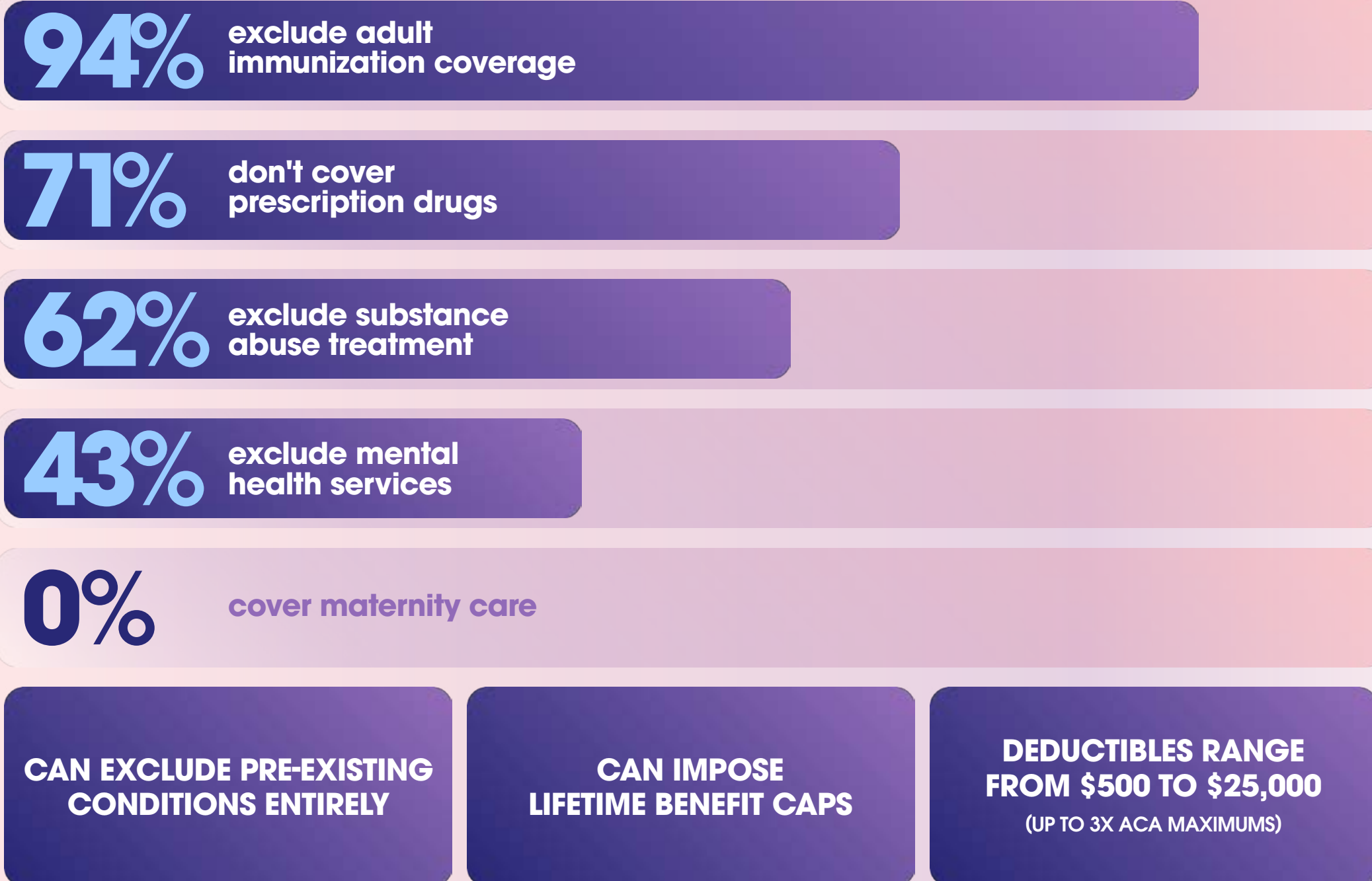


## Short-Term Plans Expand As ACA Protections Weaken

In August 2025, the Trump administration suspended enforcement of Biden-era restrictions on short-term, limited-duration insurance plans, allowing these non-ACA-compliant policies to be sold for up to 36 months in some states. These plans are significantly less comprehensive than ACA coverage:

## Short-Term Plans Coverage Gaps

(KFF Analysis)



While these plans offer lower premiums—up to 54% lower than ACA plans—they leave enrollees exposed to catastrophic out-of-pocket costs and coverage gaps for essential services.

## Medicaid Work Requirements: Projected Impact Starting 2027

The One Big Beautiful Bill Act mandates Medicaid work requirements begin January 1, 2027. Once implemented, the rules will require most non-disabled, non-elderly adults aged 19-64 to work, volunteer, attend school, or participate in work programs for 80 hours per month to maintain their ACA Medicaid expansion coverage.

## Projected Impact:

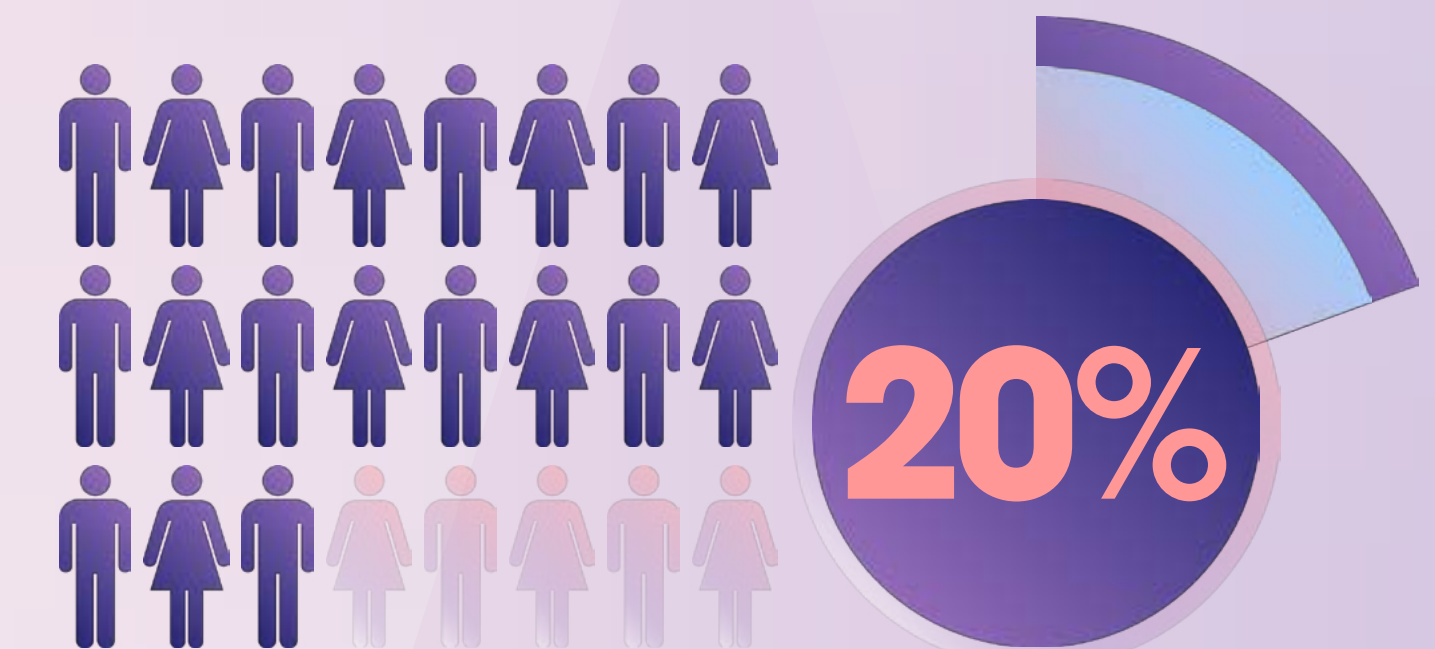
## Congressional Budget Office Estimates 5.2 Million People Will Lose Coverage By 2034

## Losses Concentrated Among Rural Residents (78% White), Black And Hispanic Adults, And People With Chronic Conditions

## Additional Coverage Losses From Administrative Barriers During Renewal Processes

## Context On Past Medicaid Unwinding:

**Separate from work requirements, approximately 9 million people (20%) lost Medicaid coverage during the 2023-2024 post-pandemic renewals process due to paperwork barriers and procedural issues.**



## Lost Medicaid Coverage



A widening red-blue health divide began to emerge in 2025. Blue states largely restored ACA protections through state law, provided additional subsidies, and strengthened oversight. Red states generally adopted more market-oriented approaches, allowing greater expansion of short-term plans and preparing for Medicaid work requirement implementation. This state-level divergence is creating increasingly different health insurance landscapes depending on geography. In addition, the combination of expired subsidies, short-term plans, and procedural changes put millions of Americans at risk of being unable to afford coverage or losing it altogether.

*\*Some impacts of 2025 policy changes will not be fully measurable until 2026 or later, as implementation timelines vary and health outcome data involves reporting lags. Projections for Medicaid work requirements reflect CBO estimates based on historical data from state-level implementations.*

### Hospital Consolidation Accelerates, Cost Of Care Rises

Hospital merger and acquisition activity rebounded in 2025 after Executive Order 14036 (Promoting Competition in the American Economy) was revoked by the Trump Administration. According to Kaufman Hall, Q3 2025 alone saw **\$8.9B in transacted revenue, including two mega mergers and 15 announced transactions in the quarter**. With 39 M&A’s finalized in 2025, industry experts project continued consolidation.

#### Notable 2025 Transactions:

- Northwell Health and Nuvance Health merger (creating \$22.6B operating budget system).
- Sanford Health’s acquisition of Marshfield Clinic (\$10B combined revenue).
- Ascension’s planned \$3.9B acquisition of AMSURG (250+ ambulatory surgery centers).
- Rady Children’s merger with Children’s Healthcare of California.

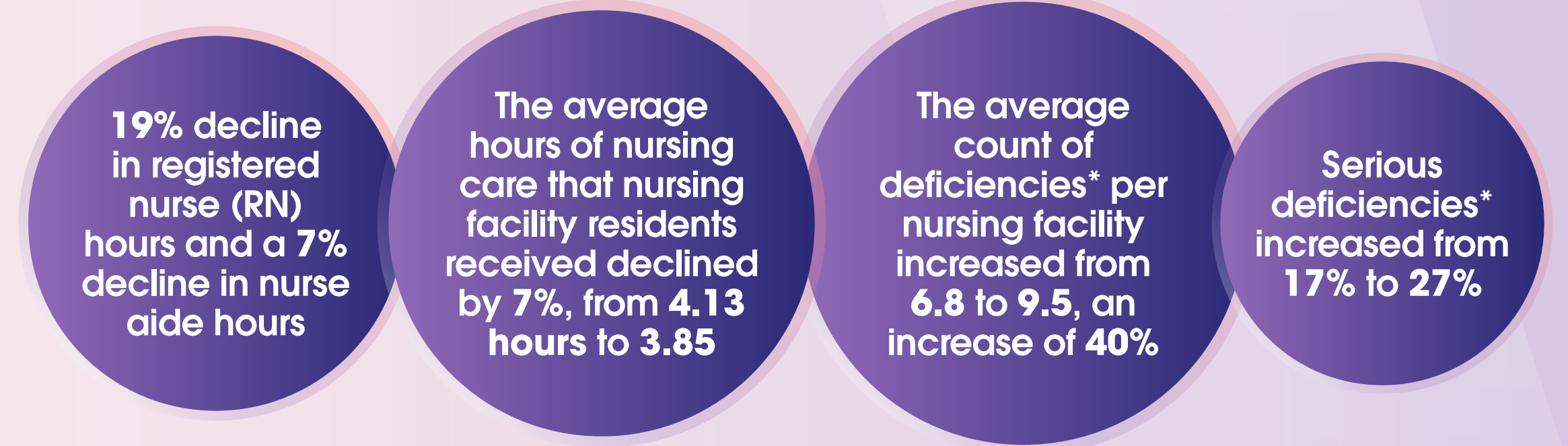
Research consistently shows that hospital consolidation in concentrated markets is associated with estimated **price increases from 3-65%**, though the magnitude varies by market and merger characteristics.

### Reduction Of Care And Medtech Regulation

In December 2025, CMS issued an interim final rule removing the federal requirement that Medicare- and Medicaid-participating nursing homes maintain a registered nurse (RN) on-site 24 hours per day. The rule also **rescinded minimum staffing standards of 3.48 total nursing hours per resident per day** (including 0.55 RN hours).

### Impact Of Reduced RN Coverage From 2015-2025

(KFF Analysis)



*\*Deficiencies describe any documented noncompliance with federal nursing home standards, whereas serious deficiencies are those violations that result in harm or put residents in immediate jeopardy of serious injury or death.*

### Decades Of Peer-Reviewed Research Consistently Shows That Lower RN Staffing In Nursing Homes Is Associated With:



Without 24/7 RN presence, early warning signs of serious conditions are more likely to be missed or misinterpreted by less-trained staff, and critical interventions may be delayed until the next RN shift.

In addition, the introduction of the White House AI Action Plan and the scaling back of federal safeguards yielded in the deployment of unvalidated AI tools by insurers. These tools have been accused of producing high rates of care denial—in some cases, **16 times higher than is typical**, resulting in a loss of coverage.





*Emerging evidence shows that insurers use automated decision-making systems to create systematic batch denials with little or no human review, placing barriers between patients and necessary medical care. Medical decisions must be made by physicians and their patients without interference from unregulated and unsupervised AI technology.”*

**Bruce A. Scott, M.D.**

President, The American Medical Association





2025 marked a structural shift toward a two-tier health system in the U.S., where deregulation traded short-term cost flexibility for long-term instability, higher hidden risks, and a deeper red-blue divide in health outcomes and financial exposure. Washington's role evolved from guarantor of uniform protections to arbiter of waivers, enforcement discretion, and post-hoc corrections, with states and courts increasingly setting practical boundaries for coverage, pricing, and care standards.

Looking ahead, the hardening red-blue divide will make health outcomes increasingly dependent on zip code. Without restored safeguards, renewed subsidies, and strengthened patient protections, 2026 will likely bring deeper inequities, reduced access to comprehensive coverage, and mounting human costs—particularly for vulnerable populations—that short-term premium savings cannot justify.



# International Development: Reevaluating And Realigning United States Foreign Aid

## Human Impact Score: 18/20

*Note: Before reading this section it is important to note Americans believe foreign aid is about 25% of the federal budget when it is actually less than 1% according to Brookings. As the world's wealthiest nation, the U.S. provides more assistance than any other country, but a smaller proportion of its gross national product (GNP) than other peer donors.*

As domestic deregulation reshaped U.S. and global markets, the retrenchment of U.S. foreign assistance reshaped entire countries and rebalanced geopolitics. On January 20, 2025, the White House issued “[Reevaluating and Realigning United States Foreign Aid](#)” (widely referenced as [EO 14169](#)), directing a 90-day pause on U.S. foreign development assistance while agencies conducted a rapid alignment review under an “America First” framework. The State Department subsequently issued implementation guidance confirming the pause in practice. As the review proceeded, steep cuts to USAID and humanitarian efforts ensued, producing the most significant retreat in U.S. development leadership since the early 1990s. Registering a 18/20 human impact score, the effects were immediate, human, and hard to undo.

### Why Aid Networks Don't Bounce Back

Development assistance is not only monetary; it is a delivery network—local partners, procurement pipelines, trained staff, data systems, and operating trust. Once contracts pause and staff disperse, capacity degrades quickly and does not automatically return if funding resumes.

That point is captured in public commentary by former USAID official Atul Gawande, who warned: [“You can't rebuild that network built up over 60 years and destroyed in a matter of weeks.”](#)

A parallel warning came from former USAID Administrator Andrew Natsios, describing the abrupt loss of crisis-response capacity: [“we don't have the tools anymore to deal with these crises because we just eliminated them all.”](#)





USAID Dissolution By The Numbers:



5,300+ of 6200+ programs terminated (ie 83% of programs)



294 of 10,000+ staff retained



\$27.7B in terminated awards while only \$8.3B awards remain active



80% of global health awards terminated

Domestic Consequences Of The Cuts

The retrenchment reverberated at home through risk channels that don’t always show up as immediate domestic headlines. U.S. firms dependent on stable supply chains, climate-resilient agriculture, emerging-market growth, and global health security were indirect losers. Disrupted agricultural and resilience programs weakened crop supply chains for American agribusiness. Pharmaceutical companies lost vaccination and distribution partners while disease outbreaks abroad raised spillover risk. Exporters saw demand soften in African and Asian growth markets. These are not easily quantified in a single metric, but senior diplomats and analysts argued that the pause and dismantling of aid threatened U.S. global leadership and strategic interests.



China Reaps The Benefits

Many analysts argue that U.S. pullback created openings for China’s narrative and influence, particularly in countries where U.S.-funded civil society, governance, and humanitarian programs had anchored America’s local legitimacy. Some analyses indicate that U.S. foreign aid cuts have restored China as the world’s largest bilateral development partner, with the United States ceding “larger partner” status to China in more than 40 countries. The Center for Global Development notes that China “has stepped in to fund child literacy, nutrition, and landmine clearance programs in Cambodia previously backed by the U.S. and has made overtures to Nepal and Colombia about filling gaps. Alongside South Korea, it sent \$4 million to the Africa CDC in response to the U.S. exit.”

While the reduction of U.S. presence has created opportunities for others to step in, available data suggest that China is not fully filling the vacuum—nor does it need to in order to reap strategic benefits.



## International & Domestic Impact

### International Impact:

- **Jobs Lost: 258,161**

\*as of 12/29, 2025 tracked by USAID Stop-Work

- External health assistance projected to drop **30-40%**
- An internal USAID memo estimated that an additional **12.5-17.9 million** malaria cases and an additional **71,000-166,000 deaths** could occur annually
- Loss of U.S. support for Gavi could mean **75 million children** missing routine vaccinations over five years and **>1.2 million deaths**
- **Nigeria:** 185k people facing food and water insecurity
- **Democratic Republic of Congo:** 200k+ people losing food and water security
- **Syria:** 118k people lose water access
- **Kenya:** 600k+ people face food insecurity
- **Liberia:** 25k+ children losing access to meals in school
- **Haiti:** 300k+ people losing food security

\*a significant portion of global data was provided by Mercy Corp, an organization that is on the front lines globally and lost aid through the cuts.

### Domestic Impact:

- **Jobs Lost: 22,453**

\*as of Dec 19, 2025 tracked by USAID Stop-Work

- **Food Security:**

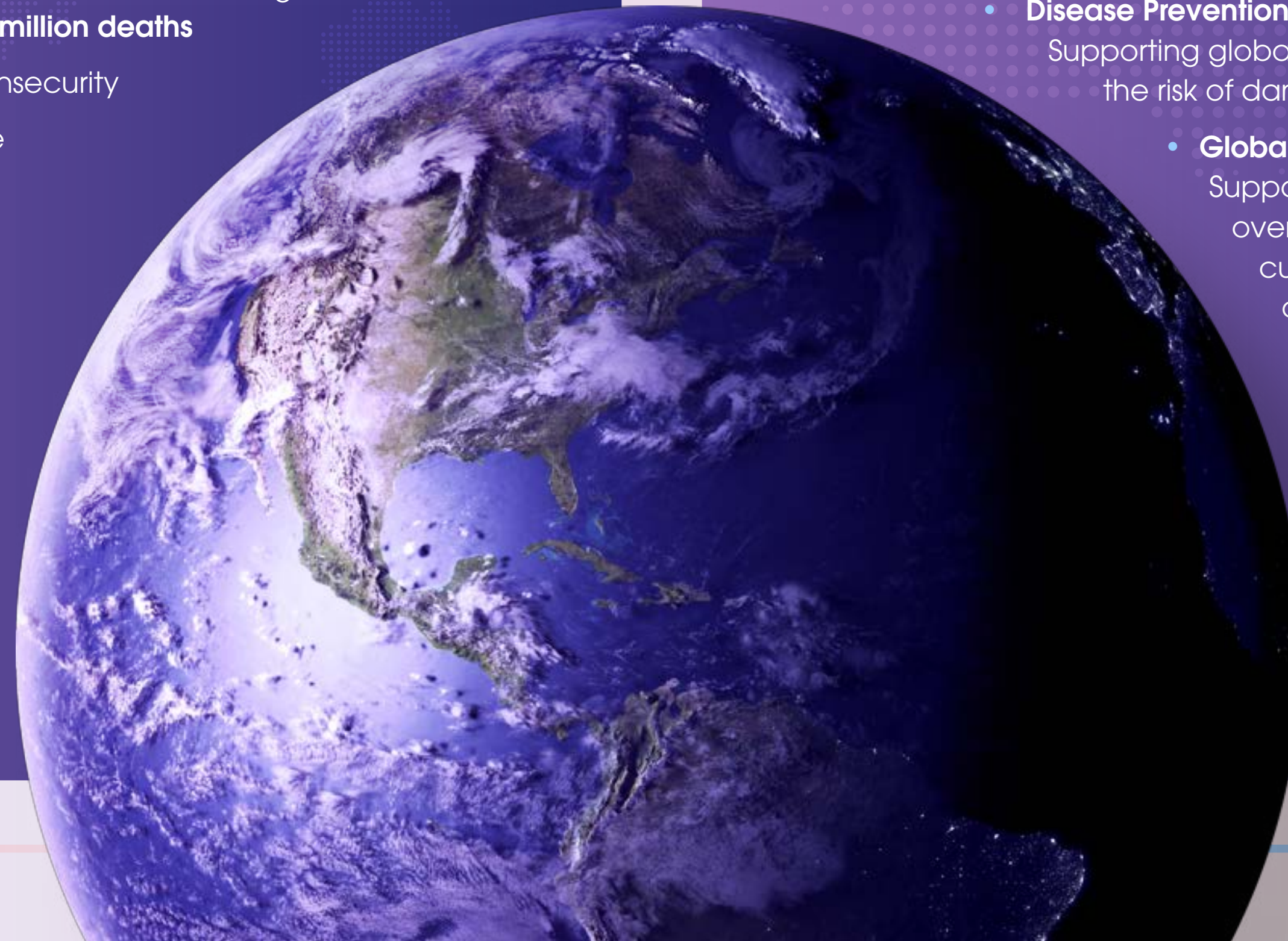
USAID created global partnerships with American farmers, agribusinesses, and research institutions to help increase food security and create new markets for US development.

- **Disease Prevention:**

Supporting global health and safety protects Americans by reducing the risk of dangerous pathogens reaching U.S. borders.

- **Global Stabilization and Counter Migration:**

Supporting economic and infrastructure development overseas promotes regional stability and opportunity, curbing migration pressures and simultaneously advancing American economic interests through stronger, more reliable global markets.







Where domestic regulatory moves can often be adjusted, the blows to International Development have stuck, structurally downgrading Washington from an anchor donor to a narrower, more transactional soft-power player with potentially less sway in multilateral forums.

Moving forward, key signals to watch include whether any meaningful rebuilding occurs, how far health and food-security indicators deteriorate in hardest-hit countries, and the extent to which China and other actors convert limited financial moves into durable influence gains where U.S. programs once anchored local legitimacy.



# Energy: Eliminating Regulation To Foster Energy Innovation

**Human Impact Score: 17/20**

Energy became the clearest case study of how deregulation can turbocharge economic activity while splintering the domestic rulebook and weakening climate and public-health commitments abroad. Anchored by a [Zero-Based Energy Regulatory Budget](#) and executive actions on permitting, methane, PFAS, and environmental review, the Trump administration effectively rewrote the operating code of the U.S. energy system. Oil and gas infrastructure development accelerated through streamlined permitting processes, though actual production and economic impacts remained subject to market conditions, existing contracts, and the extended timelines inherent to major energy projects. On human impact, the sector scored 17/20, as localized health burdens, environmental-justice risks, and global climate impacts spilled well beyond U.S. borders.

## A Zero-Based Reset Of Energy Oversight

The policy pivot began in April 2025 with the issuance of the [Zero-Based Regulatory Budgeting to Unleash American Energy](#) executive order. The directive required all energy-related regulations across the Environmental Protection Agency (EPA), Department of Energy (DOE), Federal Energy Regulatory Commission (FERC), and other agencies to undergo public comment on their costs and benefits—or face automatic expiration by September 30, 2026. Additionally, energy rules administered by these agencies are now subject to periodic ["sunsets"](#), meaning they automatically expire unless renewed, limiting the durability of long-term standards.

Congress reinforced this deregulatory shift by repealing [the Inflation Reduction Act's methane fee](#), further weakening financial incentives for emissions detection and reduction.





Regulatory And Operational Impacts

The policy changes had immediate and wide-ranging effects. The EPA extended compliance deadlines for major methane standards, delayed coal ash monitoring upgrades, and granted exemptions for several facilities under the Hazardous Organic NESHAP (HON) program. Meanwhile, the Department of the Interior (DOI) and DOE accelerated approvals for liquefied natural gas (LNG) export terminals, oil and gas pipelines, offshore leases, and petrochemical expansions—particularly along the Gulf Coast.

Permitting Timelines Were Reduced Dramatically:

Environmental Assessments  
1 Year → 14 Days

Environmental Impact Statements  
2 Years → 28 Days

Framing And Response

The White House characterized these actions as necessary steps to “clear obstacles to American energy dominance”. Public-health officials, environmental advocates, and regulatory experts, however, described the pace and scale of these changes as unprecedented, unsafe, and procedurally unsound, warning that weakened oversight and abbreviated review timelines substantially increase the risk of environmental and health harms.

On American Soil: A Year Of Defining Trade-Offs

Energy deregulation emerged as a defining environmental-justice story of 2025. Oil, gas, and petrochemical companies recorded their strongest year since 2014, while health harms—particularly for communities least able to bear them—intensified amid broad regulatory rollbacks.

Industry Expansion And Consolidation

Gulf Coast operators accelerated expansion through expedited permitting and new project announcements:





## Regulatory Retreat And Cost Savings

In September 2025, the [EPA proposed a rule](#) to suspend most of its Greenhouse Gas Reporting Program (GHGRP) requirements, removing reporting obligations for several sectors—including oil and gas—until 2034. The agency’s analysis estimated **\$2.0B to \$2.4B in cost reductions from the GHGRP amendments**, lowering compliance costs but sharply reducing transparency in emissions tracking.

## Public Health Impacts

The American Lung Association’s [State of the Air 2025 report](#) found that **156.1 million Americans live in areas with unhealthy pollution levels**—an increase of roughly 25 million from the prior year. Expanded production in Texas and Louisiana has further alarmed public health officials, as [emissions from flaring and refinery operations—often concentrated near low-income and minority communities](#)—continue to compound chemical-exposure and PFAS risks, reinforcing longstanding patterns of disproportionate harm.

## Global Climate And Geopolitical Spillovers

The consequences extended globally. The methane deregulation created market challenges for U.S. LNG producers seeking to meet EU methane intensity requirements. Meanwhile, [82% of U.S. LNG exports in February 2025 went to Europe](#), reaching a historic high and creating contradictory pressures—driving down energy costs while binding buyers to long-term fossil fuel commitments. Perhaps most significantly, the rollback of climate policies undermined American standing in international climate negotiations, [as many countries now view the United States as an unreliable partner](#). This created an opportunity for U.S. competitors, namely China, to position themselves as partners in clean-energy deployment and climate finance. As with International Development, sweeping deregulation within the Energy sector produced a familiar trade-off: immediate economic gains achieved at the cost of diminished long-term strategic leadership.







The 2025 Energy Deregulation initiative established new regulatory frameworks aimed at accelerating fossil fuel development through streamlined permitting and reduced monitoring requirements. While industry welcomed the changes and announced major expansion projects, the full economic, environmental, and health impacts remained difficult to assess given the short implementation timeline. Early concerns focused on reduced air quality monitoring capacity, weakened methane detection requirements, and potential disproportionate effects on fence-line communities, though comprehensive data on outcomes would require several years to materialize.

In the coming years, legislative efforts to codify recent rollbacks or extend litigation timelines could entrench the current policy trajectory, intensifying local disputes even if agency leadership changes. For companies, short-term gains now carry greater exposure to environmental-justice, toxicity, and methane-intensity risks. Continued license to operate will increasingly depend on delivering verifiable community benefits and maintaining transparent, auditable records of emissions and water footprints.



# Housing & Insurance: A Streamlined-But-Fragile Equilibrium

**Human Impact Score: 17/20**

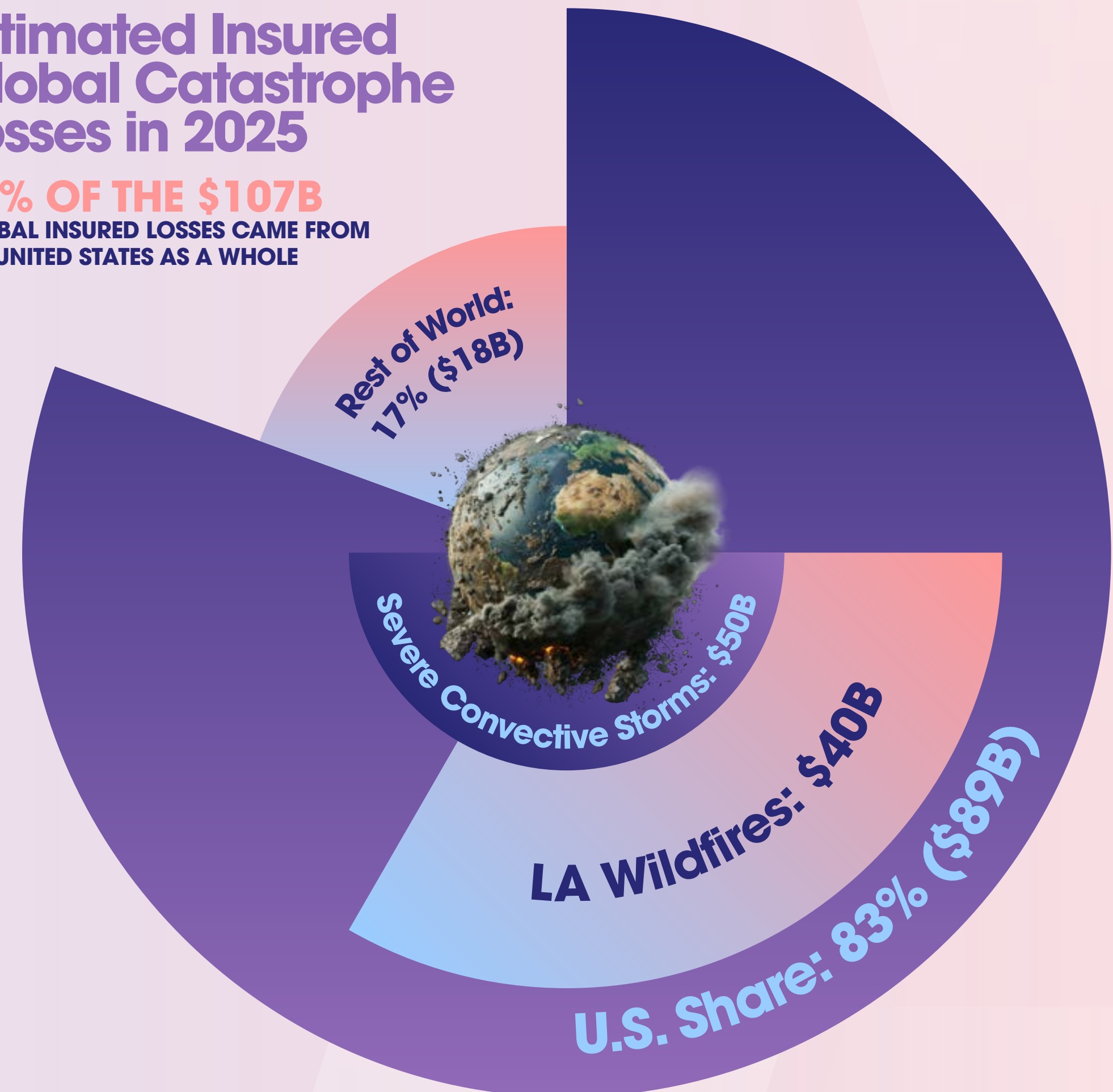
In 2025, it became easier to get some federally linked projects approved faster, but climate-driven disasters kept pushing insurance costs up and making coverage harder to find—especially in certain states. [Swiss Re \(a reinsurance company\) estimates](#) insured global catastrophe losses at about USD \$107B in 2025, with 83% (\$89B) occurring in the U.S. The costliest wildfire event in global history—the Los Angeles wildfires with \$40B in insured losses—combined with \$50B from severe convective storms drove these elevated U.S. losses. These costs ultimately landed on households, lenders, and state "last-resort" insurers. Housing & Insurance scored a 17/20 on human impact, because faster federal permitting didn't offset an insurance squeeze that raised premiums, narrowed coverage, and shifted more risk to low-income and high-risk communities.

## Oversight And Opportunity Through Federal Change

Two federal shifts mattered most. The first set the stage with the [2023 Fiscal Responsibility Act](#) establishing page and time limits for environmental reviews under NEPA—75 pages and one year for Environmental Assessments, and 150 pages (300 for very complex projects) and two years for Environmental Impact Statements—intended to speed decisions. Following this, in 2025 the Council on Environmental Quality rescinded its longstanding NEPA regulations, and the Department of Energy moved most of its NEPA procedures out of formal regulations and into internal non-binding guidance. Together, these moves can shorten reviews for some projects while narrowing the depth and duration of analysis for others.

## Estimated Insured Global Catastrophe Losses in 2025

**83% OF THE \$107B**  
GLOBAL INSURED LOSSES CAME FROM  
THE UNITED STATES AS A WHOLE





Streamlined Paths To Fragile Frontiers

Streamlining didn’t create a broad construction boom, but it did remove friction for projects with federal ties. Meanwhile, more new homes continued to be built in hazard-exposed places—especially in the wildland-urban interface (WUI) where wildfire risk is high—loading tomorrow’s insurance stresses into today’s permits. In November, EPA and the Army Corps proposed a narrower “waters of the United States” (WOTUS) definition that shifts more responsibility to states and localities for wetlands and ephemeral features relevant to flood risk.

Aggregate Gains & Acute Exposures In Insurance Markets

Industry finances looked better coming into 2025: the U.S. Property & Casualty (P&C) combined ratio improved to about 96.5 in 2024, the best in more than a decade. Alternative capital remained elevated, with robust catastrophe bond issuance (investors betting against disasters) continuing to provide reinsurance capacity. But consumers still faced broad premium hikes. Insurify projected about an 8% national increase for homeowners insurance in 2025, with much larger jumps in several states, (Louisiana at 27%, California at 21%), and more transactions hinged on whether coverage was available at all. [insurify.com](https://insurify.com)

Rents And Housing Stability: National Easing, Local Strain

National rental affordability improved modestly late in the year as a wave of new apartments hit the market and significant concessions were offered, but conditions diverged by metro: many Sunbelt markets reported higher insurance pass-throughs and maintenance costs, while stricter, supply-constrained metros saw firmer rent growth.

8% National Increase  
for homeowners insurance in 2025,  
with much larger jumps in several states:

27% Louisiana

21% California





Housing & Insurance in 2025 exemplified deregulation's paradox: some procedural efficiency and capital inflow on the supply side, but less resilience for households facing climate-amplified risk. Benefits flowed to developers and insurers, while the widespread costs landed on homeowners, renters, local governments, and taxpayers.

Looking ahead, there should be an expectation of faster but varied federal reviews; and despite improved 2024 underwriting results, 2025's disaster losses, and projected 2025 premium hikes signal continued pressure into 2026.



# Chemicals, Manufacturing & Industrials: Deregulation By Delay

## Human Impact Score: 17/20

No sector received a more direct slate of rollbacks in 2025, and none created a deeper long-tail public-health risk, than Chemicals, Manufacturing & Industrials. Across petrochemicals, plastics, industrial metals, cement, and agriculture-adjacent manufacturing, deregulation was achieved less through repeal and more through regulatory delay and inaction. Extended compliance deadlines, deferred reporting, and fewer inspections delivered immediate balance-sheet relief while quietly raising the likelihood, duration, and geographic concentration of toxic exposure for workers and nearby communities. Chemicals, Manufacturing & Industrials scored 17/20 on human impact, reflecting very high health and equity consequences even as consumer prices barely moved and job gains remained localized.

### A Generational Shift Under TSCA

In late 2025, the Environmental Protection Agency (EPA) proposed major revisions to the Toxic Substances Control Act (TSCA) framework and delayed new PFAS reporting requirements, signaling a shift toward reduced federal oversight.



### Key Changes

- **Risk Evaluation Method:** The EPA plans to scrap the “whole chemical” approach and return to evaluating risks by specific condition of use. This narrower method could reduce findings of “unreasonable risk” and limit broad restrictions.
- **Worker Protection Assumptions:** The agency would again assume workers consistently have access to and use protective gear and engineering controls, lowering projected exposure estimates and weakening worker-safety safeguards.
- **PFAS Reporting Delays:** In November 2025, the EPA extended PFAS data submissions to April 2026 and introduced new exemptions to ease manufacturer reporting burdens, delaying comprehensive industry data collection.



States with active chemical safety programs are expected to strengthen their own standards to compensate for reduced federal oversight, though enforcement capacity will vary widely. For industry, the changes offer regulatory relief and greater predictability at the national level, but they also create a more fragmented landscape as state-level rules diverge from weakened federal standards.


## Public Health Concerns



172 MILLION AMERICANS WITH PFAS-CONTAMINATED DRINKING WATER AS OF AUGUST 2025



EPA ROLLBACK OF DRINKING WATER STANDARDS FOR 4 PFAS COMPOUNDS (PFHXS, PFNA, HFPO-DA, MIXTURES).



STATE-FEDERAL CONFLICTS AS CA, WA, ME, VT PRESERVE STRICTER PFAS BANS.



EXTENDED TIMELINES DELAY COMPREHENSIVE PFAS USE DATA COLLECTION.

## PFAS: Federal Retreat, State Advance

The PFAS crisis deepened in 2025 as federal protections contracted sharply. The EPA kept enforceable drinking-water standards only for PFOA and PFOS but rescinded regulations and reconsidered determinations for four additional PFAS compounds: PFHxS, PFNA, HFPO-DA (GenX), and certain mixtures of these compounds.

This rollback reversed one of the Biden administration’s signature public health initiatives and potentially left 53 million Americans without protection from these compounds, according to EWG analysis.

## Exposure Blooms

By August, EPA’s Fifth Unregulated Contaminant Monitoring Rule (UCMR 5) data showed More than half the U.S. population have PFAS-contaminated drinking water, an increase of 7 million people from earlier in the year. The Environmental Working Group’s analysis found PFAS at 98% of tested U.S. waterways, with elevated levels downstream from wastewater treatment plants and biosolids application sites.

## State Response

At least 19 states advanced PFAS legislation in 2025, with California, Washington, Maine, and Vermont moving to preserve or strengthen state-level PFAS bans and restrictions. The result is an increasingly patchwork regulatory landscape—precisely the scenario that federal TSCA preemption provisions were designed to prevent—raising the likelihood of legal conflicts over how far state authority can exceed federal standards.

## Manufacturing Gains

Manufacturing—especially steel, cement, petrochemicals, and plastics—expanded under lighter permitting and reduced emissions oversight. Industrial production increased 2.5% year-over-year as of November 2025, with manufacturing output contributing to this modest growth.

Manufacturing construction spending—a key indicator of investment in new or expanded facilities—declined during 2025, driven largely by trade policy, uncertainty, and tariffs. More than three-quarters of manufacturers responding to surveys cited trade policy as a concern. Manufacturing employment showed modest gains, with the sector adding jobs gradually after prior-year layoffs, though skilled labor shortages persisted.



PFAS FOUND AT 98% OF TESTED U.S. WATERWAYS







Chemicals, Manufacturing & Industrials in 2025 illustrated how deregulation can operate quietly but decisively. By extending deadlines, deferring reporting, and weakening enforcement, policymakers delivered measurable gains to industry while compounding long-term exposure risks for workers and surrounding communities. The changes reflect a broader move toward industry accommodation at the federal level, trading precaution for flexibility and shifting the burden of chemical safety increasingly to the states

As we enter 2026, if the EPA finalizes its TSCA framework revisions and weaker rules stick, expect more pollution hotspots, higher cleanup and water bills for nearby communities, and a messy patchwork of state crackdowns and lawsuits that make 2026 riskier for both residents and companies.



# Labor & Workplace Safety: The Quiet Deregulation That Hit Workers First

**Human Impact Score: 15/20**

As Trump took office, federal labor and workplace safety regulation entered a period of significant uncertainty as his administration initiated a comprehensive regulatory freeze, paused Biden-era rulemaking, and signaled a shift toward reduced enforcement priorities. Unlike energy or finance, labor deregulation in 2025 rarely made headlines, however it had immediate, personal effects on millions. As federal enforcement slowed, inspections fell, wage protections were gutted, and heat protections vanished during one of the hottest summers on record. Fatalities rose in construction and manufacturing, among other high-risk jobs. Millions felt deregulation through injuries, lost wages, and unsafe jobs. In our scoring, Labor & Workplace Safety registered 15/20 on human impact—severe, concentrated harm to low-wage, immigrant, and high-risk workers, with consequences that were direct and often irreversible.



## The Regulatory Freeze And OSHA Enforcement Retreat

On January 20, 2025, President Trump issued a presidential memorandum titled [“Regulatory Freeze Pending Review,”](#) directing all federal agencies to refrain from proposing or issuing any new rules until agency heads appointed by the president reviewed and approved them. The memorandum immediately withdrew any rules sent to the Office of the Federal Register that were not yet published, and directed agencies to consider postponing for 60 days the effective dates of rules already published.

This action had immediate consequences for OSHA rulemaking. The proposed [“Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings”](#) rule—which would have required employers to provide water, rest breaks, shade, and acclimatization plans when heat index reaches 90 degrees—was effectively halted despite having completed its public comment period on January 14, 2025, just six days earlier.



## Record Heat, Frozen Protections, States Forced To Step Up

The timing of the heat rule freeze proved significant. Months later, a record summer hit and extreme heat events occurred across the United States.

**Over 255 million Americans**  
exposed to dangerous, life-threatening” triple-digit temperatures

OSHA's frozen heat rule would have protected approximately  
**36 million workers**

**18 states proposed heat safety legislation in 2025**  
—more than double the number from 2024—  
as the federal rule remained frozen

Without the federal heat standard, worker protections now depend on state rulings. California, Washington, and Oregon kept robust heat illness prevention regulations requiring rest breaks, shade, and water. Agricultural workers in Texas, Florida, and Arizona—predominantly Latino, immigrant, and low-income—bore the brunt, as they have historically.

## Gutting Minimum Wage Protections For Millions Of Workers

In [March of 2025](#), The President issued an [Executive Order](#) revoking [Biden’s 2021 Executive Order](#) that effectively raised the federal contractor minimum wage from \$17.75/hour back to \$13.30/hour, each and creating confusion over which wage applies to new vs. existing contracts.

**Federal Wage Rollback:**  
**\$17.75/hour → \$13.30/hour**

[In July of 2025](#), the Trump administration withdrew a Biden-era rule that would have ended Section 14(c) certificates, allowing 600+ employers to continue paying ~38,000 disabled workers subminimum wages averaging \$4+/hour in some states.

- 16 states already ban 14(c) waivers with no drop in disabled employment.
- Waivers were declining nationally; Biden rule would have phased them out entirely.
- Administration claims necessity for jobs, despite evidence showing otherwise (90% of 14(c) workers have intellectual disabilities).

In addition, the Trump administration is proposing to strip federal minimum wage and overtime protections from [3.7 million domestic workers](#) (home health aides, caregivers) earning a median \$34,900/year, reopening a 1938 Fair Labor Standards Act (FLSA) loophole [closed by Obama in 2013](#). This exemption [would allow employers to pay millions of domestic workers below the federal minimum](#) of \$7.25/hour and deny overtime (time-and-a-half) for hours over 40 per week.

These rollbacks reveal a deliberate recalibration of federal labor priorities, prioritizing employer flexibility over wage floors for society’s most vulnerable workers, with ripple effects that could deepen inequality and strain state-level protections in an already fragmented regulatory landscape.

## NIOSH Elimination Guts Worker Protection Research

Through DOGE, the Trump administration [eliminated 85-90% of NIOSH](#) (National Institute for Occupational Safety and Health), a HHS research agency distinct from OSHA enforcement. This left no government body to independently study workplace hazards, certify respirators, or develop science-based safety standards.

### Key Losses ([AFL-CIO Analysis](#))

- Hazard investigations in high-risk sectors (mining, firefighting, fishing, construction, oil/gas, healthcare).
- Respirator approvals (blocked COVID counterfeits, protects from toxins).
- Specialized programs: PPE lab, mining surveillance, ag/forestry research, education centers.

2026 is poised for rising injury/illness/death rates for workers in dangerous industries, counterfeit PPE incidents, and slowed standards updates as OSHA operates without research backing and state-level or private efforts are unlikely to match NIOSH’s national scope and independence.





Federal labor deregulation in 2025 under the Trump administration sharply reduced enforcement by agencies like OSHA and DOL, leading to immediate safety and wage harms for millions of low-wage, immigrant, and high-risk workers. This “quiet” rollback sets a template for future deregulations, proving enforcement cuts yield rapid behavioral changes without headlines, but with stark interstate disparities that reshape where jobs, housing, and migration occur.

If federal job-safety, heat rules, and wage protection aren’t restored, 2026 will likely mean more people getting hurt or killed at work, a loss of wages, and a bigger gap in protections between states that enforce the rules and those that don’t.



# Finance: A New Leniency In Federal Oversight

## Human Impact Score: 14/20

Finance showed how quickly power concentrates when federal oversight recedes. With the Fed, FDIC, OCC, SEC, and CFPB all pulling back at once, regulators loosened capital rules, merger scrutiny, and consumer protections. The near-term gains were clear: billions released from regulatory buffers, record buybacks, a major merger wave, and surging profits across banks and crypto platforms, while households paid more in fees and faced weaker safeguards. As a result of our analysis, Finance received 14/20 on human impact.

### The Federal Retreat Begins

#### Basel III Endgame Suspended

An early Wall Street win for the Trump Administration was suspending the [Basel III “Endgame” capital rule](#). In July 2023, federal regulators proposed rules that would have required the eight largest U.S. banks—including JPMorgan Chase, Bank of America, Citigroup, and Goldman Sachs—to raise capital by approximately 19% for the largest institutions (16% aggregate across all affected banks). The 2023 proposal faced fierce industry opposition and was substantially revised in September 2024 by Fed Vice Chair Michael Barr, who proposed cutting the capital increase from 19% to approximately 9%.

**However, in January 2025, the new Trump Administration issued a “regulatory freeze” that effectively halted the rulemaking process. Following the regulatory freeze:**

- JPMorgan announced a \$50B buyback—one of the largest buyback authorizations in banking history.
- U.S. stock buybacks surged to record territory in 2025, with repurchases by large U.S. companies.
- Strategists estimated that buybacks hit \$1.5T in 2025, with potential to grow by an additional \$600B.





## Consumer Protection Collapses — States Fill The Void

The sharpest household impact followed the CFPB's retreat. Under new leadership, the bureau largely ceased investigations, rulemaking, supervision, and enforcement activities, all of which are tools used to protect consumers.

### Systematic Dismantling Of Consumer Protections

- **Guidance purge:** On May 12, 2025, [Vought revoked 67 guidance documents](#) that had directed how financial institutions should treat consumers, including eight policy statements, seven interpretive rules, 13 advisory opinions, and 39 other guidance documents.
- **Enforcement collapse:** [The CFPB dismissed several federal court cases against financial institutions and sought to vacate settlements](#), abandoning billions in potential consumer relief.
- **Credit card late fees restored:** On April 15, 2025, the CFPB asked a Texas court to vacate its own credit card late fee rule in a consent judgment with industry plaintiffs. [The rule had cut late fees from \\$30-\\$41 down to \\$8](#) and was projected to save 45 million consumers an estimated \$10B annually—\$220 among households that regularly incur late fees. Banks can now charge the higher fees again.
- **Overdraft fee caps repealed:** On May 9, 2025, President Trump signed Congressional Review Act resolutions killing the CFPB's overdraft fee rule. The rule would have required large banks to cap overdraft fees at \$5 or actual costs, saving consumers an estimated \$5B annually or \$225 per household that pays overdraft fees. [Banks with over \\$10B in assets can now continue charging \\$35+ per overdraft](#).
- **Digital payment oversight eliminated:** The May 9th repeal also nullified a rule that would have extended CFPB supervisory authority over large nonbank companies offering digital wallets, payment apps like Venmo and Cash App, and peer-to-peer payment platforms, leaving millions of digital payment users without federal consumer protections.
- **Data broker protections abandoned:** In May 2025, the [CFPB withdrew a proposed rule that would have treated data brokers as consumer reporting agencies under the Fair Credit Reporting Act](#), subjecting companies that buy and sell consumer financial data to stricter oversight to prevent surveillance and exploitation risks.



The federal rollback has effectively erased a decade of consumer protection progress, re-exposing households to predatory practices that had once been curbed through regulation and oversight. In the absence of federal enforcement, states are emerging as the primary line of defense—**California launched junk-fee enforcement initiatives, New York issued its own late-fee guidance, and Colorado and Massachusetts revived dormant consumer protection laws.** Whether these decentralized efforts can replace a unified federal system will determine not only the resilience of consumer safeguards, but also the credibility of financial regulation in the post-CFPB era.

### Crypto's Boom — And Consumer Losses

SEC enforcement narrowed, and crypto markets surged:

- [Bitcoin reached an all-time high of approximately \\$126,000 in early October 2025.](#)
- [Ethereum rose from about \\$2,255 in February to over \\$4,670 in August.](#)
- [Coinbase reached approximately 120 million users globally in September 2025, up from roughly 110 million in 2024.](#)

However, the rally collapsed in mid-October after Trump threatened tariffs, with Bitcoin falling about 30% from its peak to around \$87,600 by end of 2025, [down approximately 6% for the year](#). Consumer harm followed: through the first half of 2025 alone, [Americans lost \\$939M to crypto scams](#), putting 2025 on pace to surpass 2024's record \$5.8B in investment scam losses. With looser regulatory guardrails, retail investors absorbed significant losses, prompting state-level regulatory responses.





The winners of 2025 were unmistakable—large banks, trading desks, shareholders, fintech lenders, crypto platforms, and private credit funds all capitalized on regulatory retreat. Those left carrying the burden were consumers in permissive states, borrowers weighed down by medical debt, rural communities losing access to local banking, and small institutions squeezed by consolidation. Blue states moved aggressively to fill the federal void, while red states largely stood back, allowing market forces to dictate the terms of consumer finance.

Looking ahead, New York and California are increasingly setting the national standard for financial regulation—even as federal oversight remains diminished. If federal watchdogs stay on the sidelines, expect bigger banks taking bigger risks, higher fees and fewer branches, more state-by-state rule fights, and crypto blending into everyday banking; if rules tighten, expect higher capital demands, merger slowdowns, and rushed compliance.



# 2026-2028 Outlook

## Stabilization Or Deepening Fracture?



**The Great Dismantling of 2025** set forces in motion that will define American governance, public health, and economic structure for years to come. Whether the regulatory fragmentation stabilizes into a sustainable “new federalism” or deepens into chronic instability depends on decisions made in the next three years—by Congress, state legislatures, courts, businesses, and civil society.

This section identifies overarching patterns in this deregulated state, potential paths forward and how to prepare when navigating an increasingly fragmented regulatory landscape.



## Cross-Sector Patterns: What 2025 Revealed

Three structural dynamics emerged across all seven sectors in 2025:

### 1. Geographic Fragmentation Is Accelerating

Blue states became the benchmark for national regulations in finance, chemicals, healthcare, and consumer protection, while red states embraced deregulation. This produced the widest state-by-state disparities in protections since before the New Deal.

**The question for 2026-2028:** *Does this patchwork stabilize into predictable regional standards, or does escalating litigation and interstate conflict make compliance increasingly untenable?*

### 2. Federal Retreat Created Persistent Vacuums

Federal deregulation created sudden institutional voids across all sectors that outpaced any replacements. Retrenchment created an opportunity for the public sector, private industry and global partners to step in and fill the gap, increasing fragmentation with the loss of national standards.

**The question for 2026-2028:** *Can state capacity, private governance, or renewed federal investment rebuild these systems, or will gaps widen into permanent structural deficits?*

### 3. Human Costs Mounted Immediately; Economic Consequences Are Lagging

Fractured global networks, delayed critical reporting, lowered testing standards, and relaxed oversight, immediately impacted millions while creating foreseeable dangers. The risk of unforeseen fallout is high. Long-term consequences to environmental, health, financial, and geopolitical problems will compound and unfold for years to come.

**The question for 2026-2028:** *Will mounting evidence of harm trigger course corrections, or will short-term industry gains and political inertia lock in trajectories with irreversible consequences?*



# Scenario Planning: Three Futures

## Scenario A: “Regulatory Whiplash” (Re-regulation)

If previously repealed protections are reinstated, industries would face a sharp swing from the Trump administration’s deregulatory agenda to an aggressive phase of re-regulation. This re-regulation would extend beyond simply restoring old rules to include entirely new regulations designed from scratch—crafted specifically to patch vulnerabilities exposed by the deregulation period, close loopholes that emerged, and address fresh risks that were not covered by prior frameworks. The result would be a more comprehensive and adaptive regulatory landscape, blending reinstatement with forward-looking safeguards tailored to recent failures in health, safety, finance, and environmental oversight. Healthcare, finance, labor, energy, chemicals, and housing/insurance sectors would all face urgent compliance pressures from reinstated rules, retroactive liabilities, staffing mandates, fee refunds, environmental reviews, and stricter risk assessments that demand rapid adaptation beyond the deregulatory era.

## Scenario B: “Deepening Fragmentation” (Deregulation Persists)

If deregulation continues, the United States settles into a “deepening fragmentation” in which national growth statistics can look strong while protections for health, safety, and climate become highly uneven and depend heavily on where people live. The 2025 rollback package hardens into a new baseline—reinforced by legislation, courts, and a durable political coalition—locking in weaker guardrails across healthcare, finance, labor, energy, chemicals, housing, and development, with widening gaps in risk, cost, and life expectancy between protected and unprotected communities. Healthcare, finance, labor, energy, chemicals, and housing/insurance sectors would navigate a patchwork of state rules where large firms adopt strictest-state compliance strategies while smaller players, workers, and consumers in permissive regions worry about uneven fees, safety gaps, contamination risks, and climate exposures without federal backstops.

## Scenario C: “Hybrid Trajectory” (Most Likely)

In a hybrid future, deregulation would neither fully persist nor fully reverse; instead, the country would settle into an uneasy middle ground where acute harms trigger partial restorations alongside entirely new rules crafted to address gaps exposed by the 2025 rollbacks. Deeper structural weaknesses like enforcement capacity and scientific infrastructure could remain unaddressed. Highly salient protections—such as premium-reducing health subsidies, heat safeguards in deadliest sectors, or medical debt reporting limits—would most likely return selectively due to their high political cost of inaction. Blue states would increase their guardrails while red states stay permissive. State rules—especially from California and New York—could become national baselines for corporations seeking unified compliance, deepening geographic fragmentation, hobbling small firms unable to adapt regionally, and concentrating human costs on vulnerable regions and demographics.

**In all scenarios, the need for real-time, accurate, policy monitoring becomes imperative for businesses navigating compliance whiplash.**

### Why Monitoring Is Mission Critical

- **Regulatory U-Turns:** 2025 showed rules can vanish overnight but return fast under new leadership.
- **50-State Chaos:** Blue states fill federal gaps while red states stay lean, creating conflicting compliance requirements across operations.
- **Litigation Traps:** Courts fast-tracking state vs federal cases mean yesterday’s “safe” practice becomes tomorrow’s violation.
- **Long-Tail Liability:** Delayed reporting hides exposure that triggers toxic torts, wrongful death claims years later.

### What Real-Time Monitoring Delivers

- **Speed:** Detects executive orders, CRA resolutions, state AG actions within hours, not weeks.
- **Precision:** Maps “strictest-state floor” against federal relief opportunities.
- **Proactivity:** Flags pending CRA windows (Spring 2026), Basel III redos (Early 2026), Medicaid work requirement impacts (Jan 2027).
- **Risk Mitigation:** Documents voluntary compliance buffers as litigation defense.

**Bottom line:** Without continuous monitoring, companies risk over-compliance in red states, under-compliance in blue states, or getting caught flat-footed by 2028 re-regulation—turning short-term gains into multi-year liabilities.



*is a policy intelligence platform built to discover what policy impacts your organization, how it impacts you, and the strategy you need to move forward.*



# Navigating Deregulation For Key Stakeholders

## For Businesses: Understanding The Patchwork

### The Era Of Uniform National Standards Is Over. States Now Lead:

- California and New York adopted their own financial rules after the CFPB's retreat.
- The West Coast retained heat protections despite a frozen federal rule.

*Tip: Default to the Strongest Standards, California and New York effectively set national baselines.*

#### Multi-state operators must budget for:

- 50-state compliance mapping and tracking.
- Legal costs from state-federal conflicts (e.g., TSCA preemption vs. state PFAS bans).
- Operational complexity from regional variation.
- Competitive pressure from single-state rivals.

*Example: After the CFPB dropped late-fee caps, national operators still had to follow CA and NY rules. Building to the toughest standard prevents repeated system rebuilds.*

## Treat Deregulation As Temporary

Don't overextend during permissive periods. Maintain voluntary buffers in:

- **Workplace safety:** Continue heat protections, PPE standards, and testing.
- **Environmental monitoring:** Keep methane, PFAS, and air-quality checks active.
- **Consumer protection:** Sustain fee transparency, AI validation, and clear disclosure.
- **Financial stability:** Hold capital above relaxed requirements and avoid risky mergers.

*Tip: Document all voluntary protections from 2025–2028—they demonstrate good faith if litigation follows.*

## Hedge Against Long-Tail Liabilities, Deregulation Amplifies Long-Term Risks:

- Toxic torts: PFAS contamination, air pollution, worker exposures.
- Wrongful deaths: Heat-related or healthcare-related fatalities.
- Environmental justice suits: Pollution in fence-line and low-income areas.
- Securities cases: Undisclosed financial or environmental risks.





## For The Public: Protecting Yourself In A Fragmented System

### Know Your State’s Protections

Access to healthcare, workplace safety, clean water, consumer protections, and financial safeguards now depends primarily on geography. Do research for your state and local municipality to understand regulations across Healthcare, Chemicals & Manufacturing, Labor & Workplace Safety, and Finance.

	Healthcare	Workplace & Safety	Environment	Finance
Questions To Ask	Does your state provide ACA subsidies beyond federal?  Are Short-Term Limited Duration Plans regulated?  Hospital merger oversight active?  Medicaid work requirements?	State OSHA plan? Heat protections?  Minimum wage?  Overtime protections for domestic workers?	PFAS regulations?  Air quality monitoring?	State consumer protection enforcement?  Late fee caps? Overdraft caps?
Plan For Interstate Variation  If you move, change jobs, or have family across state lines:	Health coverage may not transfer	Workplace protections may disappear	Environmental risks may increase	Consumer safeguards may weaken
What To Document	Save all denials, bills, coverage documents	Photograph hazards and safety violations  Track hours, breaks, overtime, pay (photograph schedules)	Document exposure to chemicals or hazards	Record all transactions, fees, communications
Tools To Use	Set calendar reminders for Medicaid renewal deadlines	Use CFPB and state consumer protection complaint systems	Subscribe to local air quality alerts  Sign up for water utility PFAS testing notifications	Check credit reports quarterly for medical debt errors
Support State Level Protections	Monitor local government meeting agendas for fast-tracked projects Participate in public comment periods (often shortened under streamlined reviews) Support state enforcement funding (CA, NY, WA, OR, CO, MA initiatives) Vote in state elections where regulatory posture is determined Engage with state legislators on protective standards			



## For Civil Society: The New Regulatory Landscape

In light of deep cuts to local and international development programs, civil society—independently organized groups such as NGOs, charities, labor unions, and community organizations—now plays a crucial role in filling enforcement, data, and support gaps left by government withdrawal.

### Litigation Is The New Enforcement Tool

With federal regulators pulling back, civil society groups and state attorneys general now lead enforcement through:

- Citizen and whistleblower lawsuits.
- State consumer protection cases.
- Class actions targeting major violations.

**What To Do:** Build legal capacity, coordinate across states, share evidence, and target clear abuses.

### Fill The Federal Data Gap

Nonprofits, universities, and local groups must create and maintain independent data systems tracking:

- Environmental harm and pollution.
- Workplace injuries and fatalities.
- Health care access and consumer abuses.

**Why It Matters:** Independent data fuels lawsuits, informs state policy, and forms the record for future federal restoration.

## Understand What States Are Setting National Standards

Strong state action now shapes national norms.  
Focus advocacy and support on:

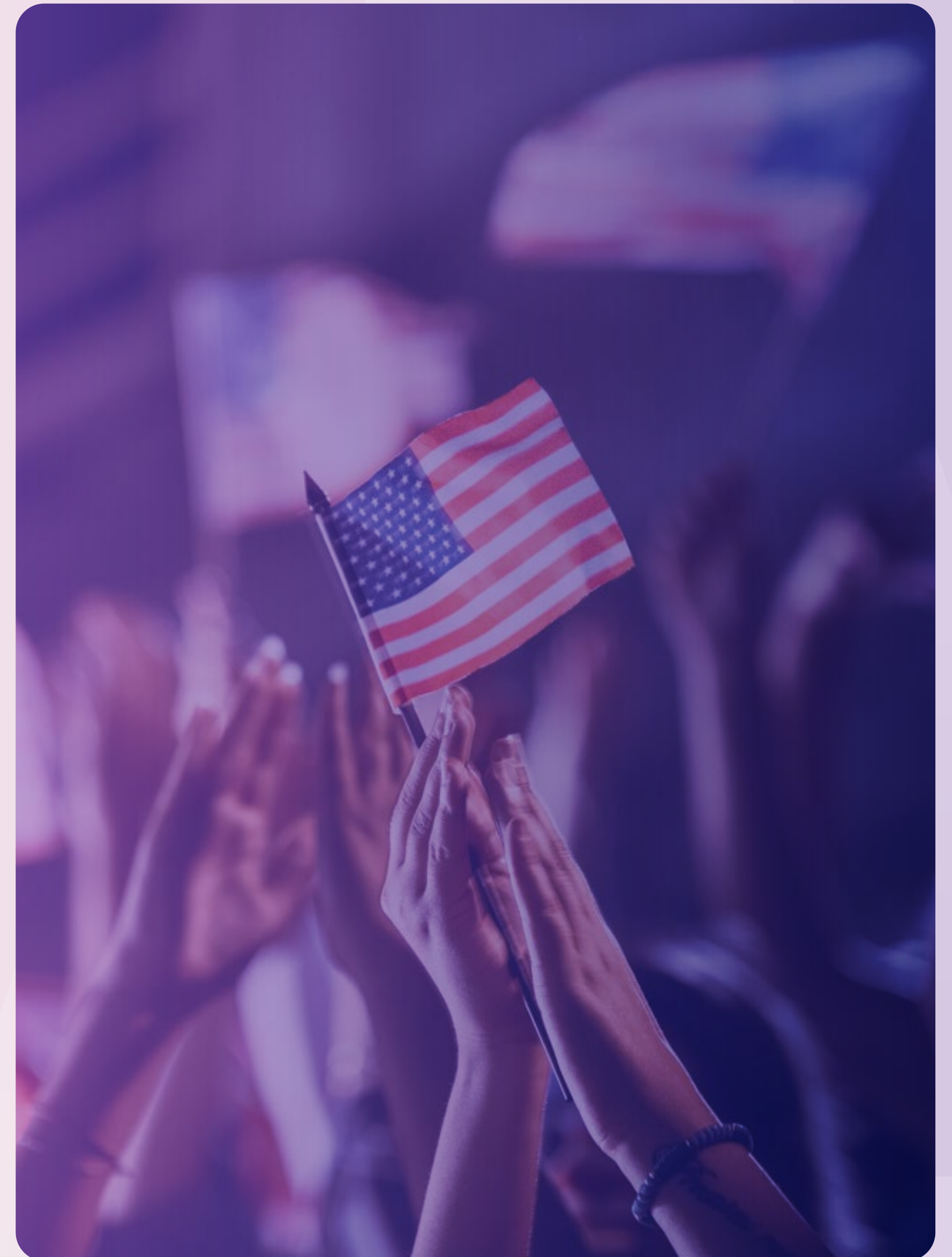
- Big states with leadership capacity: California, New York, Washington, Oregon, Massachusetts, Colorado.
- Industry-heavy states: Texas and Louisiana (energy), Michigan and Ohio (manufacturing), Delaware and New York (finance).

**Tip:** Support state AG coalitions, agency budgets, and technical expertise to enforce effectively.

### Step Up Global Engagement

As USAID withdraws, civil society must partner and diversify:

- Work with multilateral groups (UN, WHO, GAVI) and non-U.S. donors (EU, Canada, Australia).
- Reconnect with local implementing partners to keep programs alive.
- Track impacts—job losses, health setbacks, and geopolitical shifts—for eventual rebuilding.
- Expand funding beyond U.S. sources: multilateral and bilateral funds, philanthropy, and private-sector support.





# For Policymakers: Crossroads And Choices

## Near-Term Decisions Will Shape Decades

The 2026 Congress faces three paths for the sweeping 2025 deregulation, and the choice will define the next regulatory era. Data from 2025 now provides a baseline to measure the consequences of each path.

- 1

**LOCK IN DEREGULATION PERMANENTLY**  
CODIFY SUSPENDED RULES
- 2

**REVERSE DEREGULATION**  
USE APPROPRIATIONS OR THE CONGRESSIONAL REVIEW ACT TO REVERSE ROLLBACKS
- 3

**PARTIALLY RESTORE DEREGULATION**  
REINSTATE ONLY THE MOST CRITICAL PROTECTIONS WHILE LEAVING OTHERS WEAKENED

**Tip For All Key Stakeholders:**  
Using the findings from this report, key stakeholders can adjust strategies and generate strategic action plans for 2026.

## State Capacity Will Decide What Works

The “laboratory of democracy” model depends on whether states can actually enforce and innovate. Success requires:

- Adequate budgets: Large states like California and New York can fund enforcement; many others cannot.
- Technical expertise: Borrow federal experts on loan or contract, or fund academic/industry consortia to fill immediate gaps.
- Legal authority: Federal preemption (especially under TSCA) limits how far states can go beyond federal minimums. Courts will define the new boundaries.
- Interstate coordination: A 50-state patchwork hurts both business and enforcement. State-to-state compacts (e.g., CA-WA-OR alignment) and multi-state Attorney General actions are essential.

Without investment in state capacity, federal retreat means not innovation—but abandonment, with entire communities, industries, or issues falling through the cracks with no oversight at any level.





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# The Bottom Line: An Unstable Equilibrium

The Great Dismantling of 2025 set America on a path toward a fundamentally different regulatory state—one where protection depends on geography, where federal government referees rather than sets standards, and where the costs of market freedom are borne by those least able to absorb them.

Whether this becomes the permanent architecture of American governance or a historical aberration corrected in the next administration will be determined by decisions made in 2026-2028—and by how high the human costs rise before they become politically unsustainable.

While policy can be difficult to track, the unprecedented volume of policy changes in 2025 and the speed in which deregulation has occurred, has made it even more difficult to follow. This report only covers a portion of the deregulation that has occurred in an attempt to provide a greater understanding of the real human impact of such drastic change in one calendar year. Our hope is that this report brings to light information that can be used to plan and prepare for the years to come.

For any questions or media requests  
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# Appendix



# What To Watch: Critical Metrics By Sector

## Healthcare

- Uninsured rate
- Premium growth rate
- Rural ER access
- Hospital Closures
- State-by-state health outcome disparities (mortality, maternal deaths)
- Medical debt on credit reports
- Nursing home staffing hour changes
- Short-Term Plan enrollment and coverage gap incidents

## International Development

- USAID budget and staffing levels
- Vaccine coverage rates in partner countries
- Chinese infrastructure investment flows in former U.S. partner countries
- U.S. global favorability ratings
- Malaria cases and deaths
- Food security metrics by country
- Jobs impact domestically



## Energy

- Air quality grades
- PFAS detection rates
- Petrochemical output growth
- Renewable vs. fossil permitting timelines
- Emissions trajectory vs. climate commitments
- U.S. LNG export volumes and EU methane intensity compliance

## Housing & Insurance

- State insurer-of-last-resort enrollment
- Private insurer market participation by state
- Premium growth rates
- Mortgage origination in high-risk areas
- Climate disaster losses
- Rental affordability and insurance pass-through costs



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# What To Watch: Critical Metrics By Sector

## Chemicals, Manufacturing & Industrials

- PFAS detection rates and affected population
- Exposure incidents by occupation and geography
- Hazardous waste violations
- Air quality in industrial corridors
- State chemical ban effectiveness
- Manufacturing output and construction spending

## Labor & Workplace Safety

- Enforcement metrics across: OSHA, EPA, CFPB, SEC
- Workplace fatality rates by sector and state
- Federal contractor & disabled worker wages
- Domestic worker protections and NIOSH capacity
- Recovered back wages through enforcement

## Finance

- Bank capital ratios and merger activity
- Consumer complaint volumes
- Late fees and overdraft fees charged
- Crypto scam losses
- State enforcement actions (CA, NY, CO, MA initiatives)



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