October 6, 2026

Submitted electronically via Regulations.gov

The Honorable Robert F. Kennedy, Jr.
Office of the Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington DC, 20201

Re: Reducing Federal Burden for Head Start Programs (RIN 0970-AD30)

Dear Secretary Kennedy:

We, the undersigned 523 national, state, tribal, and local organizations, respectfully urge HHS to rescind the proposed rule (RIN 0970-AD30), which would eliminate critical quality standards and essential services for children and families in Head Start. For 61 years, Head Start has offered millions of children the opportunity to attend programs that support their successful entry into school by pairing high-quality early care and education with health, dental, mental health, nutrition, and family support services. Head Start has welcomed children with disabilities, children experiencing homelessness, and children in foster care, and has given their families a partner in meeting their children's needs. Removing the standards would reduce the quality and narrow the scope of services children and families receive, making the program less effective in its primary goals of promoting children's school readiness and helping strengthen families. It would weaken accountability of the federal investment and destabilize these programs communities depend upon, leading to greater costs to schools and communities to address in the future.

We are very concerned that, if enacted, this proposed rule would eliminate:

- **Requirements for teacher qualifications, effective teaching practices, and program hours** that ensure children receive a high-quality early education. The rule would bar programs from requiring, or even encouraging, post-secondary credentials for most positions, and removes the qualification requirements for program directors, fiscal officers, home visitors and health, mental health, and family support staff. Programs would lose the tools they use to attract and keep skilled staff at a time when qualified early educators are already scarce. The proposal rescinds requirements related to responsive care and interactions that support language and critical thinking, intentional routines, and learning experiences that help children progress on all aspects of development. It eliminates teacher training on curriculum, addressing challenging behaviors in the classroom, supporting children with disabilities, and supporting dual language learners. The rule also removes requirements related to program hours, creating a floor of 3 hours of programming per day. These changes would result in fewer full-day programs and would make Head Start less effective in accomplishing its mission of preparing low-income children for school.
- **Teacher-child ratios and class size limits** that allow staff to give each child the attention they need to optimally support early learning and keep classrooms safe. The rule defers instead to state

child care licensing rules which are not designed to support early learning, and HHS estimates that each teacher would be responsible for 16 to 32 percent more children per classroom. Larger groups mean less effective teaching, less attention for children's learning, and makes it harder for staff to supervise safely and respond to the children with the highest needs.

- **Developmental, hearing, and vision screenings and specified health, mental health, and dental services** that: ensure any issues are caught early and supported; help families access an ongoing source of medical and dental care; and support children in catching up on well child visits, immunizations, and dental exams. These proposed changes compromise child health and access to health care (including mental health and dental care), particularly in rural areas with limited health infrastructure.
- **Requirements for serving children with disabilities** that allow them to participate fully alongside their peers. Programs would no longer have to: accommodate children so they can take part in every aspect of the program, serve children while an evaluation for special education services is pending, or observe the current limits on suspension and the prohibition on expulsion. The rule also removes the protection that no child may be turned away because a program believes it cannot serve a child with a disability or chronic health condition.
- **Requirements to find and enroll children experiencing homelessness and children in foster care** that facilitate access to Head Start. Programs would no longer be required to actively recruit these children or to try to keep a child enrolled when the family moves, and would lose the explicit option to hold up to 3 percent of slots open for them. In addition, for children experiencing homelessness, the proposal removes requirements to partner with the school district liaisons who often know which families have young children. The rule also removes the 90-day window to gather immunization and other records and the flexible ways a family can verify homelessness, including self-attestation, so a child could be turned away at the door over paperwork.
- **Research-based instruction and assessment** for multilingual learners. Under the proposed rule, all instruction in Head Start programs would be required to be in English, and programs would no longer screen or assess children in their primary language– the language they speak and understand. Children would be evaluated in a language they are still learning, and families would lose necessary materials and communication that keep them connected to their child's education. Research is clear that Head Start's approach to support young children's home language alongside English is the best way to support development, learning, English acquisition, and later school achievement.
- **Family support services** that help strengthen and stabilize families and can help lift them out of poverty. Under the proposed rule, the parent partnership service requirements would be weakened by removing requirements to address safety, health and economic security as well as requirements to establish and track goals and outcomes. As a result, parents may receive fewer support services that help connect them to employment, education, housing, food assistance, and other social support services that help strengthen and stabilize families.
- **Infant and maternal health services for the youngest children** that begin during pregnancy and continue through a baby's first months. Early Head Start serves roughly 16,000 expectant families under standards requiring that a pregnant woman be connected to prenatal care, that a newborn visit take place within two weeks of birth, and that families be referred for nutrition, housing, and maternal mental health support. Nearly all of these requirements would be eliminated, allowing new mothers and infants in Early Head Start to go without essential screenings and services, or to receive them outside the medically appropriate window. The proposed rule would create serious challenges for families during a particularly vulnerable period for maternal and child health, and it

deviates from the decades of research that serve as the foundation for the program's design, implementation, and federal funding.

- **Parent governance and engagement requirements** that give families and community members a formal role in decisions about their own children's programs. The rule removes the dispute resolution process that gives the parent-majority Policy Council standing with the governing board, makes parent committees optional, and ends reimbursement for the costs low-income parents incur to take part in parent governance roles. Requirements for parent-teacher conferences, home visits, and an open-door policy would also be dropped, limiting opportunities for parents to engage in their children's education and development.
- **Safeguards in the grant renewal process** that protect communities from abruptly losing a long-standing Head Start program. The rule adds an open-ended condition that could force any program to compete for its grant based on any violation HHS identifies, and removes the requirement that programs be notified a year in advance with an explanation of the basis for the decision.
- **The statutory cap on administrative costs of 15 percent, reducing the limit to 5 percent**. On top of years of flat funding and rising operating costs, that reduction would force local programs to cut staff, reduce services, or serve fewer families. Some Head Start programs have indicated that they would have to close their doors.

The Administration has proposed serving more children in Head Start by cutting quality and services. Not only would this approach make the program less effective, it would undermine programs' ability to expand access, reversing several years of progress to recruit teachers and reopen classrooms in the wake of the pandemic. Many programs have indicated that they cannot operate with a reduced administrative cap, fewer teachers, and lower wages. Moreover, programs indicate that adding more children to the classroom would result in teachers leaving Head Start.

These standards are also what assure taxpayers, state leaders, and Congress that federal dollars are offering comprehensive and high-quality services to children and families. Head Start is a federal program, and replacing consistent national standards designed to promote school readiness with a patchwork of state child care licensing rules designed only to meet basic health and safety standards means that a child's access to health services and screenings, qualified teachers, and family support would vary. This is particularly worrisome given that HHS has used its proposal to lower standards and reduce quality to justify not including an increase for Head Start in the most recent President's Budget.

Head Start has held bipartisan support for more than 60 years because helping children arrive at kindergarten ready to learn is not a partisan proposition, and because the program has been held to standards that justify the investment.

We urge the Department to rescind this proposed rule and to work with Congress to provide the investment that Head Start programs need to serve more children with high-quality, comprehensive services that effectively prepare children to start school successfully.

Sincerely,

National Organizations

Abriendo Puertas/Opening Doors

AFT

All Our Kin

All4Ed

American Academy of Pediatric Dentistry

American Academy of Pediatrics

American Association of Public Health Dentistry

American Association of University Women (AAUW)

American Dental Association

American Federation of State, County & Municipal Employees (AFSCME)

American Institute on Disparities in Public Health

American Network of Oral Health Coalitions

American Public Health Association - Oral Health Section

Asian Americans Advancing Justice | AAJC

Association of Children's Residential & Community Services (ACRC)

CACFP Roundtable

Caring Across Generations

Center for American Progress

Center for Law and Social Policy (CLASP)

Children's Defense Fund

Children's Environmental Health Network

Children's HealthWatch

Children's Trust Fund Alliance

Clearinghouse on Women's Issues

Coalition on Human Needs

Collaborative for Academic, Social, and Emotional Learning (CASEL)

Committee for Children

Common Sense Media

Community Change

Council For Professional Recognition

Division for Early Childhood of the Council for Exceptional Children (DEC)

Early Childhood Solutions

Easterseals, Inc.

EdTrust

Education Law Center

Family Promise

Family Values @ Work

Feminist Majority Foundation

First Focus on Children

Foster Care Training Today

Generations United

Georgetown University Center for Children and Families

Great Kids, Inc.

ImmSchools

Institute for Women's Policy Research

Low Income Investment Fund (LIIF)

Mental Health America

Moms First

MomsRising

Montessori Public Policy Initiative

National AgFamilies Head Start Families Association

National Alliance for Partnerships in Equity

National Association for Family Child Care (NAFCC)

National Association for Family, School, and Community Engagement (NAFSCE)

National Association for the Education of Young Children (NAEYC)

National Association of Counsel for Children

National Association of Social Workers

National Black Child Development Institute

National Center for Learning Disabilities

National Council of Jewish Women

National Diaper Bank Network

National Disability Rights Network (NDRN)

National Down Syndrome Congress (NDSC)

National Immigration Law Center (NILC)

National Network for Oral Health Access (NNOHA)

National Partnership for Women & Families

National PTA

National Skills Coalition

National Women's Law Center

PA Nation

People Power United

Reach Out and Read

Respectful Ways Trauma-Informed Programming & PD

RISE Partners LLC

SchoolHouse Connection

Service Employees International Union (SEIU)

Start Early

The Alliance to Reclaim Our Schools (AROS)

The Arc of the United States

Trust for Learning

UnidosUS

Vote Mama Lobby

Youth Law Center

ZERO TO THREE

Multi-State Organizations

Child Care for Every Family Network

Destiny Huff Consulting, LLC

Educators for Excellence

Head Start WEST (Arizona, California, Guam, Hawaii, Nevada) Kansas

Infant Death and SIDS (KIDS) Network, Inc.

Region VII Head Start Association (Iowa, Kansas, Missouri, Nebraska)

ResourceFull Consulting, LLC

Seed & Sew

Southern Education Foundation

Workers United / SEIU (Connecticut, New Jersey, New York) UMOS

(Illinois, Minnesota, Missouri, Texas, Wisconsin)

United Food and Commercial Workers Local 227 (Indiana, Kentucky)

United Ways of the Pacific Northwest (Idaho, Oregon, Washington)

State, Territorial, and Local Organizations

Alabama

Alabama Arise

Prevent Child Abuse Alabama

Alabama Institute for Social Justice

Alaska

Alaska Dental Action Coalition

Alaska Children's Trust

Arizona

Arizona Network for HomeBased Childcare

Children's Action Alliance

Arizona Association for the Education of Young Children (AzAYEC)

Arkansas

Arkansas Advocates for Children and Families

Arkansas Chapter, American Academy of Pediatrics

Excel by Eight

California

Alliance for Children's Rights

Allies for Every Child

Alum Rock Union Elementary School District

Black Californians United for Early Care and Education

California Alliance for Child and Family Services

California Association for the Education of Young Children

(CAAEYC) California Child Care Resource & Referral Network

California Community Action Partnership Association

California School Employees Association

California School-Based Health Alliance (CSHA)

Cavity Free SF

Child Care Law Center

Children's Defense Fund-California

City Church

CommUnify of Santa Barbara County

Community Action Marin

Community Child Care Council (4Cs) of Alameda County

E-Center

Early Edge California

Early Head Start Home Base

EveryChild California

Families In Schools (FIS)

Family Childcare Association of San Francisco

First 5 Association of California

First 5 Sacramento

Fore Women

Fresno Economic Opportunities Commission Head Start 0-5

Gilroy Unified School District

Kidango

LA Best Babies Network

Local Early Education Planning Council of Santa Clara County

Local Planning Council for Child Care Development for the County of Nevada

Long Beach USD Head Start

MAOF

Marin County Free Library

Mendocino County Local Child Care & Development Planning Council Milpitas

Unified School District

Momentum Pediatric Therapy Network

Moreland School District

Morgan Hill Unified School District

North Coast Opportunities, Inc.

North Marin Community Services

Optimal Solutions Consulting Group, LLC

Parent Voices CA

Parent Voices Oakland

Plaza de la Raza Child Development Services, Inc.

San Diego for Every Child

San Mateo County Child Care Partnership Council

Santa Clara County Office of Education

Sierra Cascade Family Opportunities

Sierra Nevada Children's Services

Siskiyou Early Head Start

Solano Family & Children's Services

The Children's Partnership

Volunteers of America Southwest

Wu Yee Children's Services

Colorado

Colorado Children’s Campaign

Connecticut

Area Cooperative Educational Services (ACES) Early Head Start

Bright Giggles Learning Center

Children's Community School

Children's Learning Centers of Fairfield County

CIFC Education, Danbury Early Learning Programs

CIFC Greater Norwalk Head Start

Clifford Beers Community Care Center

Community Foundation of Eastern Connecticut

Connecticut College Child Development Lab School

Connecticut Early Childhood Alliance

Connecticut Head Start Association

Connecticut Oral Health Initiative

Connecticut Voices for Children

Creating Kids at the Connecticut Children's Building

Creative ME LLC

CT Alliance of YMCAs

Diaper Bank of Connecticut

EdAdvance Head Start Prenatal to Five

Friends Center for Children, Inc.

Greater New Haven Early Childhood Network

HFCCEC- Hartford Family Child Care Educators Community Inc

HRA of New Britain

Kelly’s Little Angels

King Formica ECE Consulting

LULAC Head Start Inc.

Madison School for Young Children

Mansfield Discovery Depot

Mid-Fairfield Community Care Center

New Haven Federation of Teachers, AFT Local 933

Read to Grow, Inc.

The CT 359 Network

TVCCA Head Start

United Way of Greater New Haven

United Way of Greater New Haven, Parent Leadership Training Institute

United Way of Southeastern Connecticut

West Haven Community House

Delaware

Wilmington Early Care and Education Council

New Castle County Head Start, Inc.

Delaware Head Start Association

Delaware Readiness Teams

Delaware Association for the Education of Young Children

Delaware State Dental Society

District of Columbia

DC Association for the Education of Young Children

EMPCC

Florida

Florida Dental Association

Florida Chapter of the American Academy of Pediatrics

Florida Head Start Association

CHS Early Head Start

Georgia

9to5 GA

Hawaii

Hawai‘i Friends of Restorative Justice

Idaho

Children’s Home Society of Idaho

Idaho Association for the Education of Young Children

Idaho Head Start Association

Idaho State Dental Association

Prevent Child Abuse Idaho

Illinois

Advance Illinois

BCMW Community Services

BCMW Head Start

Carole Robertson Center for Learning

Champaign County Regional Planning Commission

Civic Leaders for Illinois Children

COFI - POWER - PAC IL

Educare West DuPage

Embarras River Basin Agency Head Start

Empowerment Opportunity Center

Greater Chicago Food Depository

Heartland Head Start Inc.

Illinois Action for Children

Illinois Association for the Education of Young Children (ILAEYC)

Illinois Collaboration on Youth

Illinois Head Start Association

Illinois Oral Health Coalition

Illinois State Dental Society

Kankakee County Wide Head Start

Kids First Chicago

Little Dragons Early Childhood Program

Peoria Citizens Committee for Economic Opportunity Head Start

Metropolitan Family Services

Mount Vernon SD 80

NICAA Head Start

Project NOW Head Start

Raising Illinois Prenatal-to-Three Coalition

Riverband Head Start and Family Services

RPC Early Childhood Education Program

SIU Carbondale Head Start

Southern Seven Health Department/Head Start

Tazewell-Woodford Head Start

The Children's Center of Cicero/Berwyn

Tri County Opportunities Council Early Head Start and Head Start Programs

Two Rivers Head Start Agency

Wabash Area Development, Inc.

We, the Village Coalition

Women Employed

Indiana

Indiana Head Start Association

Indiana Changemakers

Iowa

Community Action Agency of Siouxland

Iowa Association for the Education of Young

Children Iowa Dental Association

Oral Health Iowa

Kansas

Harmon & Harmon Family Childcare

Kansas Action for Children

Kansas Chapter, American Academy of Pediatrics

Kansas Head Start Association

Kansas Parents as Teachers Association

Lil' Hawks Early Learning Program

Lil Hawks Policy Council

Oral Health Kansas

Kentucky

Greater Louisville Central Labor Council

Kentucky Oral Health Coalition

Kentucky State AFL-CIO

Northern Kentucky Central Labor Council

Protect Our Schools KY

The Revolution KY

Louisiana

Louisiana Head Start Association

Maine

Children's Oral Health Network of Maine

Family Child Care Association of Maine

Maine Association for the Education of Young Children (MaineAYEC)

Maine Children's Alliance

Maine Dental Association

Maine Parent Federation

Maine People's Alliance

Mid-Maine Chamber of Commerce

Maryland

Coalition for a Healthier Frederick County

Latino Child Care Association of Maryland, Inc.

Maryland Chapter, American Academy of Pediatrics

Maryland Dental Action Coalition

Maryland State Dental Association

Massachusetts

Apple Orchard School

BCNC

Boston Teachers Union

Charlestown Nursery School

Children's League of Massachusetts

Corner Co-op Nursery School

Ellis Early Learning

Federation for Children with Special Needs

Lexington Playcare Center

Magic Garden Inc.

Massachusetts Association for Infant Mental Health

Massachusetts Coalition for the Homeless

Massachusetts Council of Nonprofits

Massachusetts Early Childhood Funder Collaborative

Newtowne School

Strategies for Children

Michigan

Kids' Food Basket

Michigan Chapter of the American Academy of Pediatrics

Michigan's Children

Michigan Council for Maternal and Child Health

Michigan Dental Association

Michigan Head Start Association

Michigan Oral Health Coalition

Michigan League for Public Policy

Mothering Justice

Minnesota

Children's Defense Fund Minnesota

Dodge County Public Health

Jewish Family & Children's Service of Minnesota

Minneapolis Youth Coordinating Board

Minnesota Dental Association

Minnesota Head Start Association

Minnesota Prenatal to Three Coalition

Reach Out and Read Minnesota

Young Hearts Open Minds

YWCA Duluth

Mississippi

Mississippi AFL-CIO

Mississippi Chapter of the American Academy of Pediatrics

Mississippi Dental Association

Oral Health Mississippi Coalition

Missouri

Missouri Dental Association

Montana

Zero to Five Montana

Nebraska

Nebraska Dental Association

NECC

Stand for Schools

Nevada

Nevada Dental Association

New Jersey

East Orange Child Development Corporation

Gateway Community Action Partnership

Montclair Child Development Center Inc.

New Jersey Academy of Pediatric Dentistry (NJAPD)

New Jersey Citizen Action

New Jersey Dental Association

New Jersey Hispanic Dental Association

New Jersey Dental Foundation

New Jersey Head Start Association

New Jersey Oral Health Coalition

NJ Communities United

SPAN Parent Advocacy Network

State Wide Education Organizing Committee

New Mexico

New Mexico Association for the Education of Young Children (NMAEYC)

New Mexico Dental Association

New York

Alliance for Quality Education

Children's Defense Fund New York

Early Care and Learning Council

New York State Oral Health Coalition

North Carolina

Foundation for Health Leadership and Innovation

North Carolina Dental Society

Ohio

Advocates for Basic Legal Equality

Cleveland VOTES

Creative Solutions

HealthPath Foundation on behalf of Oral Health Ohio

Honesty for Ohio Education

HOPE Toledo

Ohio Association for the Education of Young Children (Ohio AEYC)

Ohio Chapter, American Academy of Pediatrics

Ohio Equal Rights

Right to Read Ohio

Southwest Ohio Association for the Education of Young Children

Oklahoma

Oklahoma Association for the Education of Young Children affiliate of NAEYC and SECA

Oklahoma Turning Point Council | Mobilizing Coalitions for Healthier Communities

Oregon

Children's Institute

For All Families Oregon

Latino Network

Malheur County Child Development Center (MCCDC)

Oregon Education Association

Oregon Dental Association

Oregon Early Learning Hub Association

Oregon Head Start Association

Oregon Women’s Rights Coalition

Our Children Oregon

United Community Action Network Head Start/EHS

Pennsylvania

Account4Yourself, LLC

Achieva

Allies for Children

Centre County ChildCare Crisis Coalition

Child Development, Inc.

Children First (PA)

Columbia Child Development Program

District 1199C Training and Upgrading Fund

Education Law Center - PA

Engage kidz LLC

First Up

Liberty Resources Inc.

Little Bear Family

LOLAs Early Care and Education Center

Pennsylvania Association for Infant Mental Health

Pennsylvania Association for the Education of Young Children

Pennsylvania Association of Nonprofit Organizations

Pennsylvania Child Care Association

Pennsylvania Coalition for Oral Health

Pennsylvania Dental Association

Pennsylvania Head Start Association

Pennsylvania Partnerships for Children

Pennsylvania Rural Health Association

Private Industry Council

Ramsey Educational Development Institute

Shippensburg University Head Start

The Arc of Philadelphia

The Early Intervention Providers Association of Pennsylvania

Trying Together

United Way of Pennsylvania

Puerto Rico

Head Start Municipio Aguadilla Acuden PR

Rhode Island

Coalition for a Multilingual Rhode Island

Rhode Island Association for the Education of Young Children

Rhode Island KIDS COUNT

South Carolina

Pee Dee Community Action Partnership Head Start/EHS

South Carolina Program for Infant/Toddler Care

Taskforce and Action

Vital Connections of the Midlands, Inc.

Tennessee

Tennessee Chapter of the American Academy of Pediatrics

Texas

Austin/Travis County Success by 6

CHILDREN AT RISK

First3Years

Green Space Learning

Lumin Education

Opportunity School

Texas Dental Association

TexProtects

Utah

Utah Association for the Education of Young Children (UAEYC)

Utah Oral Health Alliance

Voices for Utah Children

Vermont

Building Bright Futures: Vermont's Early Childhood State Advisory Council

Have Justice Will Travel

Hunger Free Vermont

Macie's Home Childcare

Lamoille Family Center

Let's Grow Kids Action Network

Otter Creek Child Care Center, Inc.

Positive Spin VT LLC

Rochester Preschool

The Family Place

Vermont Association for the Education of Young Children

Vermont Community Action Partnership

Vermont Early Childhood Advocacy Alliance

Vermont Head Start Association

Vermont Parent Child Center Network

Vermont State Dental Society

Windham Southeast School District Early Education Services

Virginia

Virginia Head Start Association

Voices for Virginia's Children

Washington

Akin

BrightSpark Early Learning Services

Child Care Action Council

Children's Alliance

Children's Campaign Fund

Coalition Ending Gender-Based Violence

College Unbound

Communities for Our Colleges

Community Action of Skagit County

Economic Opportunity Institute

Kent Valley Early Learning Center

Kent Youth and Family Services

Kitsap Community Resources

League of Education Voters Foundation

Mann (Head Start program)

Multi-Service Center

Neighborhood House

OneAmerica

Open Arms Perinatal Services

Partners for Our Children

Puget Sound Educational Service District

Rise Together WA

Southeast Seattle Education Coalition (SESEC)

The Arc of King County (WA)

The Arc of Washington State

Washington Association for The Education of Young Children (WAEYC)

Washington State Association of Head Start and ECEAP

Washington State Community Action Partnership

Washington State Oral Health Coalition

Washington State Parent Ambassadors

Youth and Family Link

West Virginia

Early Learning Coalition of Nicholas County

Holler and Rise

Marvel Center

Miss Lucy's Family Childcare Facility

Rise Up West Virginia

Sunbeam Early Learning Center LLC

Team for West Virginia Children

Together We Grow

West Virginia Association for the Education of Young Children

West Virginia Chapter, American Academy of Pediatrics

West Virginia Community Action Partnerships, Inc.

West Virginia Dental Association

West Virginians for Affordable Health Care (WVAHC)

West Virginia Center on Budget and Policy Priorities

West Virginia Head Start Association, Inc.

West Virginia NOW

West Virginia Oral Health Coalition, Inc.

YWCA Mel Wolf Center

Wisconsin

4C For Children

Chamber of Mothers-Wisconsin Chapter

Child and Family Centers of Excellence, Inc.

Child Care Resource and Referral, Inc.

Childcaring, Inc.

Family & Childcare Resources of NEW Marathon

County Child Development Agency, Inc National

Centers for Learning Excellence

Next Door Milwaukee

Northwest Connection Family Resources Penfield

Children's Center

Rural Wisconsin Health Cooperative (RWHC)

The Excellence Center

Thriving Wisconsin

United Way of Marathon County

University of Wisconsin Oshkosh Head Start WI

Alliance for Infant Mental Health

Wisconsin Alliance for Excellent Schools

Wisconsin Early Childhood Association

Wisconsin Head Start Association

Wyoming

Wyoming Dental Association

Tribes and Tribal organizations

Hummingbird Indigenous Family Services

Quinault Indian Nation