

October 6, 2026

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

Submitted Electronically via Regulations.gov.

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

Dear Secretary Kennedy:

We, the undersigned state policymakers from across the country, many of whom are Head Start graduates, parents, or have been early childhood educators, respectfully, but strongly urge the U.S. Department of Health and Human Services (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.

Head Start is a critical high-quality early learning program that also provides comprehensive services to children and their families to promote school readiness and success in school and beyond. We have seen, and many of us experienced first hand, how it can transform a young child's life, with benefits that extend far beyond the classroom. Undermining what makes Head Start so successful will rob over 700,000 of our youngest children every year of critical opportunities that can help shape the course of their lives and, ultimately, the future of our country.

Simply put, by eliminating almost all of the Head Start Program Performance Standards (HSPPS) and adding new burdensome requirements, the Proposed Rule will diminish the quality, scope, and type of services that Head Start families receive and will immediately negatively harm our constituents and our communities, as well as the budgets we are responsible for developing. Under the guise of giving programs "flexibility," this Proposed Rule deconstructs the science-based standards and services that are so important to children's development, learning, and health. Instead it proposes new requirements and restrictions and creates ambiguity at the expense of program quality. Furthermore, the Proposed Rule will impose significant costs on state and local governments, as well as our communities, and destabilize funding for Head Start programs and the broader early childhood education ecosystem in our states. **Therefore, we strongly urge HHS to withdraw the proposed regulation in its entirety.**

For over 60 years, Head Start programs have provided critical support for millions of children and families, including high-quality early childhood education, health, dental, and developmental screenings and services for children, and supports for children with disabilities. Head Start has also connected parents to services that strengthen families and provided opportunities for leadership and a career path for many parents who become Head Start staff. We want to highlight the negative consequences of this Proposed Rule from our unique vantage point as state policymakers with direct insight into how these changes will affect our state budgets, early childhood services, and communities:

The Proposed Rule will create far-reaching changes that would directly affect the quality of Head Start services, impacting the well-being of our residents.

The performance standards this Proposed Rule seeks to eliminate are the cornerstone of Head Start's quality programming and research-based practices that have made the program's presence so impactful for children, families, and communities across our states. Reducing the quality and scope of the program will lead to fewer children arriving at our schools ready to succeed and fewer families receiving the services that help lift them out of poverty.

For example, this Proposed Rule removes evidence-based teacher-child ratio and class size requirements that support individualized learning and safe learning environments, as well as standards around suspensions and expulsions. It also reduces protections and services for children with disabilities and multilingual learners, and eliminates requirements for vision, hearing, and developmental screenings and other key health and mental health services that help ensure children get the services that they need to be successful learners. It removes and weakens qualifications and professional support for educational staff, and reduces the number of hours programs are required to be open. If this Rule goes into effect, our states will see programs with increased class sizes, fewer hours of operation, and reduced home visiting and parental involvement, among other harms. Reducing parent support services will mean fewer families connected to the resources and supports that will move them from poverty and improve their well-being. Our constituents will bear the direct impact of losing the standards which ensure that every child and family, wherever they are served, receives essential services. The consequence is more children entering our schools behind, more children in schools with challenging behaviors, more children in our schools with economically unstable families, and fewer children receiving early intervention services. This will create significant new costs for our school systems to bear.

Furthermore, these far-reaching changes that threaten to gut Head Start were proposed without engaging Head Start families, program leaders, state and local governments, or early education, child health, or family services experts. This utter disregard for our constituents and our roles as state leaders flies in the face of making Head Start reforms that empower states to meet the unique needs of our communities.

The Proposed Rule's changes to program funding will destabilize Head Start programs, a key part of our states' early education and child care infrastructure, leading to cascading effects on families, educational systems, and state budgets.

The Proposed Rule will limit the amount that Head Start programs can spend on administrative costs to 5 percent, which could lead programs to curtail their services and operations substantially. The current regulations implement the Act's 15 percent ceiling but the Proposed Rule contradicts them, creating confusion and increasing administrative burden. This will lead to instability or even closure for some Head Start programs. According to HHS, only 3.7 percent of programs currently meet this 5 percent metric, which reflects how untenable it is for programs to achieve. About half of Head Start grants serve 200 or fewer children, representing smaller-scale operations that may have more limited ability to distribute fixed administrative costs - particularly those in rural and frontier areas where Head Start is the only source of child care.

As programs grapple with these changes, families will also be faced with additional costs as programs are no longer required to cover essential needs like formula or diapers during program hours, curtail health care services, and shorten program hours. Decreases in program duration will increase families' child care costs and lead more families to seek state child care

subsidies or state pre-k programs that better fit their work needs. This increased demand on state child care subsidies and state pre-k programs will increase demands on state budgets.

Other changes in the Proposed Rule will have similar effects that put pressure on the broader child care ecosystem and lead to increased costs for states. For example, the Proposed Rule's English-only instruction mandate is an exclusionary practice that will likely lead families to seek child care subsidies or state pre-k programs that provide more appropriate services for their families. This too will place new costs on state budgets. Multilingual learners who remain in Head Start will be disadvantaged, as research is clear that English-only instruction can be a barrier to children's English learning and academic achievement, meaning more children will enter the public school system behind. Our local K-12 school districts – many of which are already stretched for resources – will face the burden of addressing the resulting educational and developmental gaps. All of these changes will increase costs to our states.

The Proposed Rule will worsen working conditions for Head Start educators and directly impact parents' ability to work, leading to more unemployment and harmful impacts to our state economies.

Along with the above stated changes to program quality and scope of services, the Proposed Rule would also significantly harm educators and staff by eliminating requirements for breaks alongside required mental health supports. It would also remove requirements that programs provide research-based coaching for education staff, reducing clarity and consistency around program support and professional development. Combined with a June 2026 proposal to reverse compensation and benefit increases for Head Start staff, this Proposed Rule will lead to reduced compensation for staff. All of these changes will add to existing burnout and worsening workplace conditions, and risk pushing educators out of the field. Losing Head Start educators and staff will lead to reduced slots for children, the opposite of what the Administration says this Proposed Rule aims to do.

If a significant number of Head Start programs are forced to close or reduce services due to loss of funding or staff, parents and caregivers will lose child care, risking missed work, unemployment, forced dropouts from school and training programs, and the inability to pay life expenses and support their families.

HHS's own analysis suggests 40,000 Head Start jobs will be lost nationwide and \$167 million in health services will be cut. Our states will have to absorb all of these costs, or face leaving families with significant unmet needs.

Our states rely on a strong research-based comprehensive Head Start program to help give our children a strong start in life and strengthen families. As such, we urge the Department to **withdraw its current proposal immediately and in its entirety** and instead dedicate its efforts to advancing policies consistent with the Head Start statute that strengthen—rather than undermine—Head Start and ensure children from low-income families are prepared to succeed in school.

Signed,

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