

The Honorable Robert F. Kennedy, Jr.
Secretary United States Department of Health and Human Services
200 Independence Ave, SW Washington, DC 20201
RE: Docket number ACF-2026-0595 / RIN number 0970-AD30

Dear Secretary Kennedy,

Child Care Aware® of America (CCAoA) appreciates the opportunity to comment on the Administration for Children and Families' (ACF) notice of proposed rulemaking (NPRM), *Reducing Federal Burden for Head Start Programs*. These comments are provided on behalf of Child Care Aware® of America.

Child Care Aware® of America (CCAoA) is the only national organization that supports every part of the child care system. Together with an on-the-ground network of child care resource organizations working in states and communities, CCAoA provides research that drives effective practice and policy, builds strong child care programs and professionals, helps families find and afford quality child care, delivers expertise and partnership to the military and direct service to its families, works with employers on child care solutions, and provides a real-world understanding of what works and what doesn't to spur policymakers into action and help them build solutions. Together we can make America child care strong—and that makes everyone stronger.

For more than six decades, Head Start has demonstrated what is possible when the nation invests in children and families with the greatest needs. The program has earned enduring bipartisan support because it delivers meaningful results,¹ a reality reflected both in the evidence documenting its impact² and in the experiences of the families whose lives have been positively affected. Head Start was intentionally designed to serve children facing the greatest barriers to opportunity, including those growing up in poverty and those whose families often lack access to the resources and supports necessary to fully meet their developmental, health, and educational needs.

¹ Gibbs, C. (2026, February). *Early learning across decades: Advances in measuring Head Start effectiveness* (NBER Working Paper No. 34812). National Bureau of Economic Research. <https://doi.org/10.3386/w34812>

² Bauer, L., & Schanzenbach, D. W. (2016, August 19). *The long-term impact of the Head Start program*. The Hamilton Project. https://www.hamiltonproject.org/assets/files/long_term_impact_of_head_start_program.pdf

The Head Start Program Performance Standards are a critical foundation of that success. These evidence-based standards ensure that programs provide comprehensive, high-quality services that support children’s learning, health, family well-being, and school readiness. Far from creating unnecessary burden, these standards establish the consistent expectations that make Head Start a trusted and effective program for vulnerable children and families. Head Start’s longstanding success is no accident. It reflects a deliberate commitment to quality, accountability, and comprehensive services that help children thrive, and families succeed. Any changes to the program’s requirements should preserve that commitment.

It is possible to reduce unnecessary burden without reducing services; to give local programs flexibility without making quality optional; and to expand access without asking children, families, and educators to accept less in return. But too many of the proposed changes undermine Head Start’s benefits for children and families—in healthy development, educational attainment, and economic well-being. In fact, the program has a positive return on investment,³ yielding higher savings than it costs.

In addition to prioritizing ensuring that Head Start programs operate at a high level to support the children and families they serve directly, it is also important to consider the impact of the proposed changes on the broader early childhood system across the country. Head Start models some of the most effective practices for early childhood services. Weakening Head Start’s standards harms the whole early care and education system. Head Start expands rural child care access, strengthens the early childhood workforce, and provides comprehensive services where no other options exist.

We urge you to rescind the proposed rule and consider an alternative approach to modernize Head Start.

We are particularly concerned about the following policies included in the proposed rule:

The Administrative Cost Cap

Reducing the administrative cost cap will undermine the quality and effectiveness of Head Start services. There is a substantial body of research demonstrating positive outcomes for children and families⁴ which reflects the impact of a comprehensive, high-quality Head Start model, supported by the infrastructure and personnel necessary to deliver those services effectively. Administrative funds are not simply overhead; they support critical functions that directly contribute to program quality, safety, and compliance. For example, programs may rely on administrative funding to

³ Washington State Institute for Public Policy. (2024). *Head Start*. <https://www.wsipp.wa.gov/BenefitCost/Program/272>

⁴ Gibbs, C. (2026, February). *Early learning across decades: Advances in measuring Head Start effectiveness* (NBER Working Paper No. 34812). National Bureau of Economic Research. <https://doi.org/10.3386/w34812>

conduct criminal background checks for potential staff, coordinate family services, manage program oversight or support health and mental health consultants.

Imposing a substantially lower administrative cap would limit local programs' ability to make strategic decisions about how best to allocate resources to meet the unique needs of their communities. Rather than providing flexibility, the proposal would constrain local leaders' capacity and autonomy to maintain the staffing, systems, and supports they need.

A significant share of Head Start grantees currently operate above the proposed threshold, changing it would require many programs to make difficult and potentially disruptive adjustments with little evidence that doing so would improve services for children or families. Instead, the proposal risks weakening program quality, reducing critical supports, and destabilizing operations that are essential to delivering the comprehensive services that have made Head Start successful. **Rather than imposing arbitrary limits that could weaken program operations and reduce critical supports, we recommend eliminating the proposed administrative cost cap reduction.**

Ratios and Group Sizes

We are also deeply concerned about the proposal to eliminate existing Head Start requirements for teacher-child ratios and group sizes. High-quality early childhood education depends on strong, responsive relationships between teachers and children. Research consistently identifies those relationships as one of the most important drivers of program quality and positive child outcomes.⁵

By allowing programs to operate under less rigorous state licensing standards, the proposed rule would likely increase the number of children assigned to each teacher,⁶ with some states permitting ratios that are dramatically higher than current Head Start requirements. In states like Georgia, Florida, and Texas, a single teacher currently responsible for four two-year-olds could become responsible for at least 10. These changes would hit the hardest where the need is greatest. States with the highest rates of early childhood poverty, where children often have the most significant developmental, educational, and family support needs, would see some of the largest increases in ratios.⁷

⁵ Yoshikawa, H., Weiland, C., Brooks-Gunn, J., Burchinal, M. R., Espinosa, L. M., Gormley, W. T., Ludwig, J., Magnuson, K. A., Phillips, D., & Zaslow, M. J. (2013). *Investing in our future: The evidence base on preschool education*. Society for Research in Child Development and Foundation for Child Development.

⁶ Meek, S., Blevins, D., Alexander, B., Powell, T., Soto-Boykin, X., & Cardona, M. (2026, August). *Lowering the bar: An analysis of how replacing Head Start standards with state child care licensing weakens early learning across the United States*. The Children's Equity Project at Arizona State University. <https://cep.asu.edu/resources/An-Analysis-of-How-Replacing-Head-Start-Standards-with-State-Child-Care-Licensing-Weakens-Early-Learning-Across-the-United-States>

⁷ Healy, M., & Barnett, W. S. (2026, August 7). *When the floor drops: The race to the bottom: What replacing Head Start ratio standards with state child care minimums will mean for children in poverty*. National Institute for Early Education Research. https://nieer.org/sites/default/files/2026-08/what_replacing_head_start_ratios_standards_with_state_child_care_minimums_will_mean_for_children_in_poverty.pdf

Consequences of increased ratios are likely to be felt across multiple dimensions of program quality, including reduced opportunities for meaningful teacher-child interactions, diminished support for children’s learning and development, and increased challenges in maintaining safe and well-supervised environments.

Moreover, higher child-to-teacher ratios would place additional strain on an already fragile early childhood workforce. Educators and caregivers report that larger group sizes and increased workloads contribute to stress, burnout, and decisions to leave the profession.⁸ At a time when the early childhood workforce is facing recruitment and retention challenges, a policy that increases job demands while reducing opportunities for effective engagement with children risks further destabilizing the workforce. **We strongly urge the Department to retain existing Head Start teacher-child ratio and group size requirements.**

Hours Per Day/Duration

Removing and reducing standard service hours is another area of critical concern. While the proposal intends to provide greater flexibility for programs to determine their hours, the cost-savings estimates under the Regulatory Impact Analysis relies on Head Start Preschool Center-Based programs reducing their service hours—not maintaining current operations. Removing service duration standards may result in children receiving, up to 132 fewer hours of Head Start programming.⁹ Without additional funding, the financial pressure on programs may lead to grantees operating at a reduced capacity, resulting in a system that provides less options for families, not more.

ACF’s own proposal recognizes that reducing service hours for Head Start Preschool Center-Based may require families to “secure alternative child care arrangements.” This shifts additional costs and logistical burdens onto working families and may create greater barriers to access for vulnerable families. At least 26 states experienced declines in the supply of licensed child care centers between 2024 and 2025,¹⁰ and the number of states with waitlists increased from 13 to 17 in 2025.¹¹ Combined, these effects may limit parents’ ability to fully participate in the workforce.

⁸ National Association for the Education of Young Children. (2026, September). *Coherence, not cuts: Educator perspectives on how to improve ECE regulation*. https://www.naeyc.org/sites/default/files/wysiwyg/user-174467/coherence-not_cuts.pdf

⁹ APA - Department of Health and Human Services, Administration for Children and Families. (2026, August 7). *Reducing federal burden for Head Start programs* (Proposed rule; 45 C.F.R. pts. 1301–1305). *Federal Register*, 91(151), 51248–51322. <https://www.govinfo.gov/content/pkg/FR-2026-08-07/pdf/2026-16134.pdf>

¹⁰ Child Care Aware® of America. (2026, May). *Child care in America: 2025 price & supply*. <https://info.childcareaware.org/price-and-supply-2025>

¹¹ National Women’s Law Center. (2026, May 20). *Warning signs: State child care assistance policies 2025*. <https://nwlc.org/resource/warning-signs-state-child-care-assistance-policies-2025/>

Stable and consistent child care arrangements are an important component of healthy child development. Allowing children to form stable attachments with caregivers is positively related to social outcomes.¹² Reducing Head Start service hours for Preschool Center-Based, Early Head Start, and family child care programs may disrupt the continuity and stability of care that children and families rely on.

Greater autonomy for Head Start programs to make community-informed choices about program operations is a worthwhile priority; however, it should not come at the expense of continuous, reliable, and stable care. **We urge the Department to withdraw the proposal to eliminate the requirements for hours per day and annual hours for Head Start Preschool Center-Based, Early Head Start, and family child care programs.**

The English-only Requirement

The proposal's English-only requirement threatens to undermine research-informed approaches that support young children's language development and learning. For dual language learners, strong development in their home language is not a barrier to English acquisition; rather, it's a critical foundation for cognitive, social, and academic growth.

High-quality early learning programs have long recognized the value of bilingual and multilingual approaches that allow children to learn English in natural, meaningful contexts while continuing to develop proficiency in their home language.¹³ Programs adopt these approaches in response to the families and communities they serve, whether that language is spoken at home or is one parents want their children to learn. By limiting programs' ability to use languages other than English, this proposal risks reducing children's access to instruction and interactions they can fully understand during a crucial period of development. It could also negatively impact language acquisition and social-emotional well-being.

The proposal is particularly concerning given the large number of dual language learners served by Head Start programs across the nation, including those in U.S. territories and linguistically diverse communities. Equally troubling, the requirement would extend beyond classroom instruction to communications with families, creating potential barriers to outreach, enrollment, family engagement, and ongoing partnerships central to the Head Start model. Effective communication with families is fundamental to positively supporting children's development. Programs should retain the flexibility to communicate with families in the languages that best meet their needs.

¹² Harknett, K., Schneider, D., & Luhr, S. (2022). Who Cares if Parents have Unpredictable Work Schedules?: The Association between Just-in-Time Work Schedules and Child Care Arrangements. *Social problems*, 69(1), 164–183. <https://doi.org/10.1093/socpro/spaa020>

¹³ Soto-Boykin, X., Meek, S., Cardona, M., & Williams, C. (2026, August). *Preserving access and opportunity in Head Start for dual language learners: A review of the science, legislative mandates, and regulatory requirements*. The Children's Equity Project at Arizona State University. <https://cep.asu.edu/resources/dual-language-learners-head-start>

Furthermore, an English-only mandate would override the community-informed decisions this proposal seeks to encourage. Rather than imposing a one-size-fits-all approach, local decision makers should have the flexibility to use evidence-informed language supports to strengthen family engagement and help dual language learners thrive. **To ensure Head Start programs can continue delivering the comprehensive, family-centered services that are foundational to their success, we recommend removing the proposed English-only requirement and preserving the flexibility programs need to support dual language learners and effectively engage families.**

Serving Children with Disabilities

Removing Head Start's services for children with disabilities standards is especially concerning because it undermines the protections families rely on to ensure their children receive appropriate services. Research demonstrates that children with disabilities who attended Head Start exhibited higher language, reading, and math scores than children with disabilities who did not attend Head Start.¹⁴ While some protections remain in the Head Start Act and other disability laws, removing most of the guidance would make it more difficult for grantees to identify disabilities and provide comprehensive support in a timely way.

Relying primarily on existing protections under applicable state laws would make access to services dependent on where a child lives and local program capacity. Under the proposed changes, children in Head Start programs would no longer be required to receive a developmental screening, and programs would no longer be required to actively recruit children with disabilities. Delayed or inconsistent screening and assessment could result in needs and disabilities being identified later—or missed entirely—causing children to miss critical opportunities during the early years of development. Similarly, removing requirements related to the inclusion and recruitment of children with disabilities could further limit families' access to appropriate services and add to existing challenges navigating the disability services system.

Head Start is a critical resource for children with disabilities, and it is often their safety net when there are no other options for care. **We strongly urge the Department to retain the HSPPS provisions that guide programs in serving children with disabilities.**

Families Experiencing Homelessness

Like children with disabilities, children experiencing homelessness would face particular risks under the proposed rules. We are especially concerned that for families experiencing homelessness the proposal would create additional administrative barriers, rather than reducing them or providing flexibility.

¹⁴ Effects of Individualized Education Programs on Cognitive Outcomes for Children with Disabilities in Head Start Programs: Journal of Social Service Research: Vol 42 , No 4 - Get Access
<https://www.tandfonline.com/doi/full/10.1080/01488376.2016.1185075>

Specifically, the proposal would restrict the acceptable forms of eligibility documentation, including removing the option for self-attestation and other flexibilities that allow families to obtain documentation after enrollment. Families experiencing homelessness frequently lack a permanent address and stable access to records. While appropriate documentation is important to ensure the health and safety of children, enrollment requirements should not unnecessarily delay access to services when families are experiencing housing instability.

Existing flexibilities allow programs to act swiftly and connect families to critical supports while families obtain documentation. In fact, Head Start programs are an important entry point to our country's broader safety net. Nearly half (49.7%) of Head Start programs in a recent study had helped families find temporary shelter and more than one-third (35.7%) reported helping families find long-term shelter.¹⁵ Access to Head Start is also associated with lower household instability.¹⁶

Importantly, removing self-attestation and other documentation flexibilities could undermine the Head Start Act's specific direction to prioritize children experiencing homelessness and remove barriers to their participation. The proposal itself acknowledges that if eliminating self-attestation is implemented, it could result in the loss of eligibility for up to 8% of currently enrolled children.¹⁷ Rather than reducing burden, this change could place greater responsibility on vulnerable families.

We urge the Department to continue prioritizing children experiencing homelessness in accordance with the Head Start Act and retain existing homelessness-specific requirements, including self-attestation and other documentation flexibilities.

Staff Qualifications

Eliminating existing qualification requirements for key Head Start positions risks weakening the leadership, expertise, and professional capacity essential to maintaining high-quality services. Program directors, family child care providers, and other specialized staff play critical roles in overseeing operations, ensuring compliance, supporting staff, and implementing the comprehensive services that distinguish Head Start from other early childhood programs. While flexibility is important, removing qualification standards altogether may reduce program quality

¹⁵ Hutchison, L., & Clincy, A. (2017). Head Start children and families experiencing homelessness: Trends, characteristics, and program services (ASPE Research Brief). U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, & Administration for Children and Families, Office of Planning, Research, and Evaluation.

https://www.aspe.hhs.gov/sites/default/files/migrated_legacy_files//178501/HeadStartHomelessFamilies.pdf

¹⁶ Chor, E. (2024). Head Start, household instability, and children's externalizing behavior problems. *AERA Open*, 10, Article 23328584241293425. <https://doi.org/10.1177/23328584241293425>

¹⁷ Department of Health and Human Services, Administration for Children and Families. (2026, August 7). Reducing federal burden for Head Start programs (Proposed rule; 45 C.F.R. pts. 1301–1305). *Federal Register*, 91(151), 51248–51322. <https://www.govinfo.gov/content/pkg/FR-2026-08-07/pdf/2026-16134.pdf>

by diminishing expectations for the knowledge and competencies needed to effectively manage and deliver services.

Equally concerning, the proposal to prohibit programs from requiring or incentivizing additional credentials, beyond those specified in regulation, would unnecessarily limit local programs' ability to make decisions about workforce development based on the unique needs of their communities, staff, and enrolled children. This proposal would curtail flexibility rather than enhance it.

Importantly, the early childhood workforce itself does not support lowering qualification standards. Findings from a recent workforce survey indicate that educators and program leaders believe reducing qualifications, credentials, and training requirements would make it more difficult to support children with developmental, behavioral, and emotional needs; place greater responsibility on experienced staff; increase incidents of stress and burnout; and create additional health and safety risks for the children they serve.¹⁸ The survey also found that both parents and early childhood providers were significantly more likely to favor strengthening, rather than lowering, provider qualifications.

Weakening qualification standards could undermine workforce stability, reduce program quality, and ultimately limit programs' ability to meet the complex needs of the children and families Head Start serves. **We urge the Department to retain current staff qualification requirements and to withdraw the proposal prohibiting programs from requiring or incentivizing additional credentials they determine are necessary to serve their communities.**

Suspension and Expulsion

Removing the existing limits on suspension and expulsion would represent a significant step backward for children who need support the most. Young children who exhibit challenging behaviors require appropriate intervention, developmental supports, and access to service – not exclusion from early learning environments.

Head Start was specifically designed to serve children facing the greatest challenges and barriers to success, including those with disabilities, developmental concerns, and significant social-emotional needs. Research shows that children with disabilities are more likely to experience exclusionary discipline practices.¹⁹ Allowing programs greater discretion to suspend or expel children risks disproportionately affecting the very children the program was created to support. Families of children displaying challenging behaviors already face substantial barriers in finding

¹⁸ National Association for the Education of Young Children. (2026, September). *Coherence, not cuts: Educator perspectives on how to improve ECE regulation*. https://www.naeyc.org/sites/default/files/wysiwyg/user-174467/coherence-not_cuts.pdf

¹⁹ Novoa, C., & Malik, R. (2018, January 17). Suspensions are not support: The disciplining of preschoolers with disabilities. Center for American Progress. <https://www.americanprogress.org/article/suspensions-not-support/>

inclusive early childhood settings. Weakening existing protections would likely further reduce access to care and educational opportunities for these children and their families.

The proposal also overlooks that there is little evidence that exclusion resolves underlying behavioral concerns. Early childhood programs provide critical opportunities for children to learn self-regulation, social skills, and appropriate interactions with peers and adults through supportive, developmentally appropriate guidance. When children are excluded from these settings, they lose access to the environments and relationships that can help address behavioral challenges and promote positive development. Failure to effectively support children during the early years may allow behavioral difficulties to persist, potentially contributing to later challenges in school, including future suspensions and expulsions.

Many states do not maintain strong protections against exclusionary discipline, and a limited number of states strictly regulate suspension and expulsion in early childhood settings. Removing Head Start's current safeguards would permit such practices in much of the country.²⁰ In addition, research indicates that classrooms with higher child-to-teacher ratios are more likely to rely on suspension and expulsion.²¹ Combined with the proposal to eliminate Head Start's ratio and group size requirements, removing these safeguards could create conditions where young children are both more likely to be excluded and less protected when they are.

We strongly urge the Department to retain the current limitations on suspension and expulsion in the HSPPS and to continue promoting evidence-based approaches that address children's behavioral needs through support, inclusion, and early intervention, not exclusion.

Families Rely on Head Start

Beyond the direct effects on Head Start programs, the proposed rule would have significant consequences for the broader early childhood system and the families and communities that rely on it.

In many rural communities, Head Start is a foundational part of the local child care infrastructure and, in some cases, the only early childhood provider available. Head Start provides 30% or more of child care capacity in 399 counties, 50% or more in 128 counties, and is the only formal child care provider in seven counties.²² Head Start also fills gaps left by persistent shortages of early childhood services. In addition to providing early learning opportunities, Head Start connects

²⁰ The Children's Equity Project. (2026). Head Start and discipline: How emotional safety protects young children. Arizona State University. <https://cep.asu.edu/blog-cep/head-start-discipline-mental-health-whole-child-health>

²¹ Gilliam, W. S. (2008, February). Implementing policies to reduce the likelihood of preschool expulsion. Foundation for Child Development. <https://www.fcd-us.org/wp-content/uploads/2016/04/ExpulsionBriefImplementingPolicies.pdf>

²² Smith, L. K., Hickey, C., & Bagley, A. (2026). Head Start's impact on the child care gap: How the loss of Head Start would widen child care gaps and weaken local systems. Child Care Trust. <https://www.childcaretrust.org/resources/head-starts-impact-on-the-child-care-gap>

children and families to health screenings, nutrition services, mental health supports, family engagement resources, and other comprehensive services that are often especially difficult to access in rural communities. Any policy changes that diminish the capacity, quality, or stability of Head Start programs risk weakening broader community systems that support children's healthy development and family well-being.

Removing duration requirements assumes families can secure alternative care for the hours Head Start no longer provides, but in many communities that care does not exist. A parent working a full-time shift whose child's Head Start day is shortened must find care for the remaining hours in a competitive market that is already short on slots.²³ Every family pushed into that market competes with others already struggling to find care, placing further strain on the entire early childhood system. Weakening Head Start's quality standards and comprehensive service model would therefore have effects well beyond individual grantees, reducing access to high-quality care for entire communities.

Implications for the Workforce

The proposed changes also have important implications for the early childhood workforce. Head Start has long served as a key source of professional development, workforce training, and career advancement opportunities within the early childhood sector. Proposals that reduce staffing standards, eliminate qualification requirements, increase teacher-child ratios, and limit incentives for credential attainment could undermine established career pathways and make it more difficult to recruit and retain qualified educators. These concerns are particularly acute given existing workforce shortages. A recent workforce survey found a substantial majority of providers reported an increased likelihood of staff leaving the field if ratios were raised,²⁴ underscoring the connection between quality standards and workforce stability.

Taken together, these proposals risk eroding both the availability of services for families and the strength of the workforce needed to deliver them, producing consequences that extend well beyond Head Start programs and affecting the broader early childhood ecosystem.

Modernizing Head Start

We support efforts to modernize Head Start, but meaningful modernization should build the program's strengths rather than weaken the standards and safeguards that have contributed to its success. A more effective approach would begin by engaging the stakeholders who know the program and the broader early childhood system best, including Head Start leaders and staff, families, state child care and education officials, community-based providers, and partners in

²³ Child Care Trust. (2026). Child Care Gaps Assessment. <https://childcaregap.org/>

²⁴ National Association for the Education of Young Children. (2026, September). Coherence, not cuts: Educator perspectives on how to improve ECE regulation. <https://www.naeyc.org/sites/default/files/wysiwyg/user-174467/coherence-not-cuts.pdf>

health, mental health, and disability services. Those discussions should reflect the diversity of the communities Head Start serves, including rural and urban communities, Tribal communities, and migrant and seasonal Head Start programs. Such an approach would ensure that any proposed changes are informed by the realities of program implementation and the needs of children and families.

Through this collaborative process, the Department could identify targeted opportunities to improve efficiency and reduce unnecessary administrative burden while preserving the fundamental quality standards. Stakeholders could help identify what is working well, what challenges programs face, where requirements could be streamlined, which standards are essential to protect, and where additional flexibility could be provided without compromising quality or access. The insights gathered through this process should then inform a more focused set of reforms that can be reviewed and refined with the very communities responsible for implementing them. This approach would promote continuous improvement while preserving Head Start's core commitment to providing high-quality, comprehensive services to children and families with the greatest needs.

Standards that protect children are not red tape. Having enough teachers to give children individual attention and giving those teachers the conditions to do their jobs well is not an administrative burden. Comprehensive health, developmental and family supports are not bureaucratic excess. Helping children experiencing homelessness and in foster care get through the door is not government inefficiency. Supporting children with disabilities and developmental delays and keeping children in the classroom rather than excluding them are not unnecessary federal mandates. Giving educators the ability to communicate with children in ways that support how they learn and develop is not government overreach. The measure of a Head Start policy isn't how many rules it eliminates. It's whether children and families are better off because of it.

Head Start's success is rooted in the very standards, safeguards, and comprehensive services this proposal would weaken. **We therefore urge the Department to withdraw the proposed rule and engage with families, providers, educators, and community partners to develop reforms that reduce unnecessary burden while preserving the quality and effectiveness that children and families deserve.**

Thank you for the opportunity to submit comments.

Sincerely,



Susan Gale Perry, Chief Executive Officer
Child Care Aware® of America