

United States Senate

WASHINGTON, DC 20510

October 6, 2026

The Honorable Robert F. Kennedy, Jr.
Secretary
U.S. Department of Health and Human
Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

The Honorable Alex J. Adams
Assistant Secretary
Administration for Children and Families
U.S. Department of Health and Human
Services
330 C Street S.W.
Washington, DC 20201

Dear Secretary Kennedy and Assistant Secretary Adams,

We write regarding the Department's proposed rule, "Reducing Federal Burden for Head Start Programs," which would revise the Head Start Program Performance Standards.¹ We are concerned about the rule's proposed changes, which include removing federal requirements for Head Start classroom sizes, instruction, and health screenings.² We are submitting the enclosed letters from Arizona organizations, which were also submitted through the public comment portal, to highlight their concerns and the importance of these services to Arizona families, and we urge the Department to preserve the standards that protect children's health, safety, and learning.

In Arizona, Head Start and Early Head Start serve 16,172 children across 332 program sites, providing early education, meals, and health services at no cost to families.³ These programs also help parents maintain employment and continue their education, with 76 percent of Head Start parents working, attending school, or participating in job training.⁴ Head Start offers a place to learn, build relationships, and receive care during years that are important to a child's development. These programs are an important part of Arizona communities and give families in need the support they may struggle to find or afford.

These services are especially important in communities where families have few child care options. Head Start provides 17 percent of child care in rural Arizona and serves 1,943 children eligible for services under the Individuals with Disabilities Education Act, 1,291 children experiencing homelessness, and 459 children in foster care statewide.⁵ For these families, access to early learning, health screenings, and family support helps meet needs that extend well beyond the classroom.

¹ Office of Head Start, "Notice of Proposed Rulemaking: Reducing Federal Burden for Head Start Programs," <https://headstart.gov/about-us/article/notice-proposed-rulemaking-reducing-federal-burden-head-start-programs>

² Arizona Head Start Association, "Arizona advocates sound alarm over proposed Head Start deregulation," republishing reporting by Mickaela Castillo, Arizona's Family, August 6, 2026, <https://www.azheadstart.org/post/arizona-advocates-sound-alarm-over-proposed-head-start-deregulation>

³ First Five Years Fund, *Head Start: Arizona, 2026 State Fact Sheet*, p. 1, <https://www.ffyf.org/states/arizona/>

⁴ First Five Years Fund, *Head Start: Arizona, 2026 State Fact Sheet*, p. 1.

⁵ First Five Years Fund, *Head Start: Arizona, 2026 State Fact Sheet*, p. 2.

We urge the Department to carefully review the enclosed letters and work with Arizona organizations to address their concerns before moving forward with changes to the program. Head Start is essential to thousands of Arizona families, and any changes must protect the quality of the education and services they receive.

Sincerely,



Ruben Gallego
United States Senator



Mark Kelly
United States Senator



KATIE HOBBS
GOVERNOR

STATE OF ARIZONA
OFFICE OF THE GOVERNOR

EXECUTIVE OFFICE

October 1, 2026

Secretary Robert F. Kennedy, Jr.
U.S. Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Ave. SW
Washington, DC 20201

Assistant Secretary Alex Adams
Administration for Children and Families
U.S. Department of Health and Human Services
330 C Street, S.W.,
Washington, D.C. 20201

Secretary Kennedy and Assistant Secretary Adams:

I am writing to express concerns about the Notice of Proposed Rulemaking entitled
“Reducing Federal Burden for Head Start Programs.”

In Arizona, Head Start and Early Head Start programs serve more than 17,000 children, including 4,900 infants and toddlers. Through Head Start, these children and their families receive the gold standard of early learning and receive wrap-around supports that help their families thrive. The proposed changes to Head Start would drastically change the Head Start model and reduce the positive outcomes that the program is known for, including improvements in school readiness, high school graduation and college enrollment, connecting children to health and dental care, and much more.

For example, in Arizona, a decade’s worth of data show that 86% of students that participate in Head Start are Kindergarten ready vs. 70% of other children. We know the Head Start model is effective, and in fact, is the only evidence-based early childhood program that parents and children have access to in Arizona.

I recently met with a group of Head Start Directors and parents to hear their feedback about the proposed rule change. They shared that their greatest concerns include:

changes to child to teacher ratio sizes, elimination of developmental screening services, elimination of home visitation, fewer supports for families, transportation concerns that could impact child safety, changes to parent engagement, concerns with suspension and expulsion, and the reduction of the administrative cap which could lead to program closures. These concerns are significant and are worth serious consideration.

The Head Start model is trusted and respected for the high quality, comprehensive services that it provides to children and families. While the desire to remove administrative burden from the program is laudable, the proposed rule change goes too far. The changes to Head Start as proposed will do more harm than good and will reduce the positive outcomes that Arizona students and families experience through Head Start programs. The proposed changes could also lead to additional costs to our K-12 system to identify and support special needs and could impact our workforce, should childcare options be disrupted.

I respectfully ask that you consider rescinding the proposed rule change and allow Head Start to continue providing its high-quality model of early care and education.

Sincerely,

A handwritten signature in black ink, appearing to be 'KH' followed by a long horizontal line extending to the right.

Katie Hobbs
Governor
State of Arizona



October 6, 2026

Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

RE: Comments on the Notice of Proposed Rulemaking, *Reducing Federal Burden for Head Start Programs*, ACF, 2026-0595

To Whom It May Concern:

On behalf of the Arizona Head Start Association (AZHSA) and the undersigned organizations, we submit this letter in opposition to the Notice of Proposed Rulemaking (NPRM) titled *Reducing Federal Burden for Head Start Programs*. Although reducing administrative burden is an important objective, this NPRM would significantly weaken the federal protections that ensure equitable, high-quality services for Arizona's children and families. For our state, the proposed changes would not reduce burden; they would reduce quality, access, and safety.

Arizona Head Start and Early Head Start programs serve more than 17,000 children each year, including more than 4,900 infants and toddlers, nearly 1,900 children with disabilities, and more than 1,200 children experiencing homelessness. These children and families rely on Head Start's comprehensive, federally protected model for early learning, health, disability, nutrition, family support, and parent engagement services. The NPRM would dismantle essential components of that model and create harmful consequences for Arizona's children, families, providers, and communities.

Accordingly, we offer the following concerns to illustrate the substantial adverse effects this NPRM would have on the services, safeguards, and supports upon which Arizona's children, families, and communities depend.

Teacher Child Ratios

The proposal to align teacher-child ratios and class size requirements with Arizona's child care licensing regulations would significantly weaken existing federal safeguards. Arizona's licensing standards permit substantially higher ratios and do not establish maximum group size limits, relying instead on square footage requirements. If implemented, this change could allow Arizona classrooms to operate at ratios as high as 1:13 for preschool-age children and 1:10 for toddlers, without any federal limit on total class size. Such an approach would diminish opportunities for individualized instruction, heighten safety concerns, and further contribute to workforce instability in a state where early childhood programs already face an annual teacher turnover rate of 34%.

Developmental Screening Services

The NPRM would eliminate federal requirements for developmental, hearing, and vision screenings, removing a critical safeguard for early identification and referral. Because Arizona does not have statewide early childhood screening requirements, Head Start's federal standards provide the only consistent assurance that children receive these services within an appropriate timeframe.

In Arizona, one in six children under age six has a developmental concern requiring follow-up. Eliminating these screening requirements would likely delay identification, exacerbate disparities, and reduce access to early intervention, particularly in rural, tribal, and border communities.

The proposed changes would have a disproportionate impact on children with disabilities, including the nearly 1,900 children with disabilities served by Arizona Head Start programs each year. In Arizona, Head Start is one of the few early childhood systems with federally protected requirements for developmental, hearing, and vision screenings. These requirements help connect children to the Arizona Early Intervention Program (AzEIP), Arizona's Department of Developmental Disabilities (DDD), and school district evaluations. Without them, identification and referral processes would

become less consistent, increasing the risk that children miss critical windows for early intervention. This impact would be especially acute in rural, frontier, tribal, and border communities, where Head Start is often one of the only early childhood settings equipped to provide inclusive services and disability supports aligned with the Individuals with Disabilities Education Act (IDEA). Deregulating these safeguards would shift responsibility to already strained local systems and increase costs for public agencies and communities.

Home Visitation

The NPRM's proposed elimination of home visiting requirements would significantly undermine access to essential services in Arizona, particularly in rural communities where few, if any, comparable home-based early childhood options exist. Arizona's home-based Early Head Start programs serve more than 1,500 infants, toddlers, and pregnant women each year, providing a critical model of early learning, developmental guidance, family support, and child safety within the home. Removing federal requirements for visit frequency, curriculum implementation, and service quality would weaken one of the only reliable pathways for families who cannot reasonably access center-based care or alternative early childhood services. For these communities, home visiting is not ancillary; it is an essential service model that supports school readiness, family stability, and equitable access to early childhood supports.

Family Services

The proposed changes would also weaken the family support services that are central to Head Start's comprehensive model. Arizona families rely on Head Start for coordinated referrals and supports related to housing instability, food insecurity, mental health, crisis response, and parent leadership. These services are particularly important in a state where child poverty remains high and recent reductions in Supplemental Nutrition Assistance Program (SNAP) benefits have increased pressure on families and the community systems that serve them. Removing federal expectations for case management and family goal-setting would leave families with fewer structured supports during periods of economic hardship. Maintaining these requirements is essential to

preserving Head Start's role as a stabilizing resource for children and families across Arizona.

Transportation

The NPRM's proposed transportation changes would create additional risks for Arizona children and families, particularly in tribal and rural communities. Arizona transportation regulations differ significantly from federal Head Start standards, and reliance on state requirements alone would weaken safety protections for children who often travel long distances to access services.

More than 40% of Arizona Head Start children live in rural counties, and several tribal Head Start and Early Head Start programs operate across vast geographic areas where families may travel 30 to 60 miles one way. Communities such as the Navajo Nation, Hopi Tribe, White Mountain Apache Tribe, San Carlos Apache Tribe, and Tohono O'odham Nation depend on Head Start transportation because many families face limited access to reliable vehicles, paved roads, or public transit. Federal transportation standards, including bus monitors, boarding procedures, and vehicle specifications, are essential to child safety in these high-distance and high-need contexts. Weakening these protections would disproportionately harm tribal and rural children and reduce access to early learning for families already facing substantial transportation barriers.

Administrative Cap

The NPRM's proposal to reduce the administrative cap from 15% to 5% would significantly limit Arizona programs' ability to maintain the infrastructure necessary for effective oversight, compliance, and service delivery. Head Start grantees are expected to meet extensive federal requirements related to fiscal management, data systems, monitoring, enrollment, staffing, family services, and child safety. However, this proposal would restrict the administrative capacity needed to uphold those obligations while continuing to hold programs accountable for meeting them. A 5% cap would therefore be unrealistic for many programs and would weaken the core systems that ensure quality, accountability, and continuity of services for children and families.

English Language Instruction

The proposal to eliminate multilingual instruction requirements would weaken early language supports and increase the risk of learning gaps that carry into kindergarten. These gaps would place additional remediation demands on local school districts and create avoidable downstream impacts on Arizona's public education system.

Homeless Families Self Attestation

The NPRM's proposed removal of attestations used to verify homelessness would create significant barriers for Arizona families. Arizona Head Start programs enroll more than 1,200 children experiencing homelessness each year. Families experiencing homelessness often lack the formal documentation typically required to verify eligibility, making attestations an essential and practical verification tool.

In Arizona, where housing instability continues to increase and 54% of renters are cost-burdened, spending more than 30% of their income on housing. Maintaining attestations, is essential to ensuring timely, safe, and consistent enrollment for Arizona's most vulnerable children.

For Arizona, the NPRM would not reduce burden; it would reduce quality, access, safety, and equity. It would weaken protections for children with disabilities, delay identification of developmental concerns, increase class sizes, reduce family supports, compromise transportation safety, undermine language access, and create new barriers for children experiencing homelessness. These consequences would fall most heavily on the children and families Head Start is specifically designed to serve and drain local resources.

For these reasons, we oppose the NPRM in its entirety and urge the Office of Head Start to withdraw the proposal and engage in meaningful consultation with states, tribal nations, Head Start families, and Head Start practitioners. Arizona's children and families deserve strong federal standards that protect safety, quality, access, and equity.

Sincerely,

Arizona Head Start Association

and on behalf of the undersigned organizations:

A Delicate Xplosion, LLC

Alesi Group, LLC

Arizona Association for the Education of Young Children

Arizona Department of Education Academic Standards ECE/ HSCO

Arizona Early Childhood Alliance

Bullhead City School District #15 Arizona

Candelen

Center for Economic Integrity

Chicanos Por La Causa

Child & Family Resources

Child Crisis Arizona

Children's Action Alliance

Creating Connections Consulting Group, LLC

Education Forward Arizona

First Things First

Great Minds Learning Center

Greater Phoenix Urban League Head Start

Helios Education Foundation

Intermountain Centers

Jardin Angelical Inc

Literacy Connects

Mi Espacio Infantil, LLC

Pinal Gila Community Child Services, Inc

Prevent Child Abuse Arizona

Quality First at Child and Family Resources

Read On Arizona

Robinson Consulting

Southwest Human Development

Stand for Children Arizona

Town of Wellton

Tucson Children's Project

United Way of Tucson and Southern Arizona

Western Arizona Council of Governments

Wildfire: Igniting Community Action to End Poverty in Arizona



Nikki Check – Vice Chair
District 3 Supervisor
Yavapai County Board of Supervisors
10 S. 6th Street, Cottonwood, AZ
(928) 639-8110

Comment Letter for Docket ACF-
2026-0595 — Proposed Rule,
“Reducing Federal Burden for
Head Start Programs”

September 16, 2026

U.S. Department of Health & Human Services
Administration for Children & Families
330 C Street SW
Washington, DC 20201

Re: Docket ACF-2026-0595 — Proposed Rule, “Reducing Federal Burden for Head Start Programs”

To Whom It May Concern:

As Vice Chair of the Yavapai County Board of Supervisors, District 3, I am writing to express my concerns about the proposed changes to Head Start’s Program Performance Standards under the NPRM “Reducing Federal Burden for Head Start Programs.” As an elected official in Yavapai County, I have seen firsthand how Head Start supports children, families, and the early childhood learning in District 3, Yavapai County.

I support the thoughtful modernization of Head Start and efforts to reduce unnecessary and costly administrative burden. At the same time, modernization should strengthen—not diminish—the outcomes children, families, and communities depend on. I encourage the Administration to reduce the number of performance standards and unnecessary bureaucracy while preserving the people, systems, safeguards, and services that make high-quality Head Start possible.

I am especially concerned about the proposal’s potential to reduce program hours and increase child ratios. I believe serving more children with shorter days is counterproductive to supporting working families. We encourage the Administration to ensure that any new flexibility is paired with meaningful safeguards and does not result in higher teaching ratios and reductions in service hours for families. These changes could undermine the very foundation Head Start was built on — high-quality, comprehensive early learning and support for the most vulnerable children.

I urge the Administration for Children and Families to withdraw or significantly revise this NPRM so that Head Start continues to meet its core mission of providing high-quality early childhood education and wholistic family services to eligible children and families.

Thank you for your consideration of these comments.

Respectfully,

Nikki Check
Yavapai County, Vice Chair, District 3 Supervisor

September 24, 2026

U.S. Department of Health & Human Services
Administration for Children & Families
330 C Street SW
Washington, DC 20201

Re: Docket ACF-2026-0595 — Proposed Rule, “Reducing Federal Burden for Head Start Programs”

To Whom It May Concern:

I am writing to express my concerns about the proposed changes to Head Start’s Program Performance Standards under the NPRM “Reducing Federal Burden for Head Start Programs.” As an elected official in Clarkdale Arizona, I have seen firsthand how Head Start supports children, families, and the early childhood learning ecosystem in my community.

I support the thoughtful modernization of Head Start and efforts to reduce unnecessary and costly administrative burden. At the same time, modernization should strengthen—not diminish—the outcomes children, families, and communities depend on. I encourage the Administration to reduce the number of performance standards and unnecessary bureaucracy while preserving the people, systems, safeguards, and services that make high-quality Head Start possible.

I am especially concerned about the proposal’s potential to eliminate federal staffing ratios in favor of state licensing standards, and reduce required program hours and days.

I support giving local communities flexibility to meet the needs of the families they serve. But flexibility should never come at the expense of the quality, safety, and individual attention children receive. Class size matters. **When there are more children for each teacher, there is less time to teach, supervise, respond to individual needs, and build the relationships young children need to thrive.** Reducing staffing ratios or shortening program hours may lower costs, but it also reduces the services and support children and working families depend on.

In Arizona, simply following state licensing ratios would **double the number of children assigned to teachers in our two, three, and four-year-old classrooms.** While that may reduce personnel costs, it would fundamentally change the level of care and education children receive.

Our nation’s youngest children deserve more than a safe place to spend the day. They deserve **enough caring, qualified adults to teach them, supervise them, know them, and help them succeed.** We urge our nation’s leaders to protect meaningful staffing ratios and program hours so that efforts to create flexibility do not unintentionally

reduce the quality of services available to children and families. These changes could undermine the very foundation Head Start was built on; high-quality, comprehensive early learning and support for the most vulnerable children.

I urge the Administration for Children and Families to withdraw or significantly revise this NPRM so that Head Start continues to meet its core mission of providing high-quality early childhood education and wholistic family services to eligible children and families.

Sincerely,

Debbie Hunseder
Vice Mayor, Town of Clarkdale
P.O. Box 308, Clarkdale, AZ 86324
928-639-2438
debbie.hunseder@clarkdale.az.gov



Sept. 25, 2026

Comments on the Notice of Proposed Rulemaking:
Reducing Federal Burden for Head Start Programs

Docket No. ACF-2026-0595 | RIN 0970-AD30

Introduction

Chicanos Por La Causa (CPLC) is a community development corporation that provides services in Arizona, California, Colorado, Nevada, New Mexico, Texas, and Utah. Since 1969, CPLC has been changing lives by developing self-sufficiency and instilling empowerment in those we serve. Our focus areas are education, economic development, health & human services, housing, and nonpartisan advocacy.

CPLC provides a better life through offering business and employment opportunities; ensuring everyone has the solid foundation of an education; providing hope through a pathway of recovery, restoration, and resiliency; and ensuring that a safe, secure, affordable home is available to every individual we serve. Today, we have approximately 40 programs & services, nearly 1,800 employees and 130 locations making CPLC one of the largest community development corporations in the nation.

An inclusive organization, CPLC last year impacted over 800,000 people throughout the Southwest.

Head Start remains one of CPLC's successful signature programs, serving 2,500 children in 200 classrooms, across four states.

Established in 1965, Head Start has national support approval of 79% of registered U.S. voters – with near-identical support among urban, suburban and rural voters. Head Start also has bipartisan support, with backing from roughly 86% of Democrats, 76% of Independents, and 73% of Republicans.

CPLC appreciates the opportunity to comment on the Department of Health and Human Services (HHS) Notice of Proposed Rulemaking (NPRM), *Reducing Federal Burden for Head Start Programs*. The NPRM proposes to rescind and replace significant portions of the current Head Start Program Performance Standards (HSPPS), with the stated goals of reducing regulatory burden, increasing local flexibility, and relying more heavily on state requirements and local decision-making. [[federalregister.gov](https://www.federalregister.gov)], [[headstart.gov](https://www.headstart.gov)]



CPLC supports efforts to reduce unnecessary administrative burden. However, we are concerned that several proposed changes would weaken critical protections and standards that have historically distinguished Head Start as the nation's premier comprehensive early childhood program. Head Start's statutory framework emphasizes school readiness, comprehensive services, family engagement, and support for children and families facing the greatest barriers to opportunity.

In accordance with proven success of Head Start programs, CPLC offers the following priorities:

- **Preserve Local Program Design Authority**
- **Preserve Comprehensive Services Including Mental Health, Screening, and Family Support**
- **Maintain Research-Based Teaching and Learning Standards**
- **Maintain Child Safety Standards and Reasonable Ratios**
- **Preserve Professional Qualifications and Competency Standards**
- **Support Local Flexibility for Dual Language Learners and English Acquisition**
- **Protect Inclusion for Children with Disabilities**
- **Preserve Self-Attestation for Vulnerable Families**
- **Protect Administrative Capacity**

Details of CPLC Head Start priorities:

1. Preserve Local Program Design Authority

CPLC supports greater local flexibility when it allows programs to respond to workforce challenges, community demographics, and family needs. However, flexibility should supplement, not replace, standards that promote child safety, school readiness, family engagement, and quality services. Programs should retain the ability to design locally responsive service models while maintaining accountability for outcomes.

2. Preserve Comprehensive Services Including Mental Health, Screening, and Family Support

Head Start's distinguishing feature is its comprehensive service model. The Head Start Act establishes Head Start as a comprehensive program that supports children's learning, health, family engagement, and school readiness. [federalregister.gov]

Current HSPPS requirements include:

- Developmental screenings (**45 CFR §1302.33**)
- Child assessments (**45 CFR §1302.33**)
- Mental health consultation (**45 CFR §1302.45**)
- Family partnership services (**45 CFR §§1302.50-1302.53**)

These systems provide early identification of developmental delays, disabilities, behavioral health needs, and family support needs.

Reducing requirements related to screenings, assessments, or mental health services may result in:

- Delayed referrals for early intervention.
- Reduced access to specialized services.
- Missed opportunities during critical periods of child development.

Recommendation

Maintain requirements for developmental screenings, mental health consultation, family partnership processes, and referral systems while allowing flexibility in delivery methods.

3. Maintain Research-Based Teaching and Learning Standards

The proposed changes may reduce requirements associated with teaching and learning environments and defer many decisions to state licensing systems. [[federalregister.gov](https://www.federalregister.gov/)], [[headstart.gov](https://www.headstart.gov/)]

Current HSPPS establish requirements for:

- School readiness goals (**45 CFR §1302.102**)
- Research-based curriculum (**45 CFR §1302.32**)
- Ongoing assessment (**45 CFR §1302.33**)
- Professional development and coaching (**45 CFR §§1302.92-1302.94**)

In CPLC's experience, state licensing requirements often emphasize health and safety and may not fully reflect the comprehensive educational, family engagement, and support services traditionally required through Head Start.

Head Start has long established federal expectations that promote school readiness, child development, and positive outcomes for children and families.

Recommendation

Preserve research-based educational and coaching standards while reducing duplicative reporting requirements.

4. Maintain Child Safety Standards and Reasonable Ratios

Several proposed changes provide local discretion regarding staffing structures, caseloads, group sizes, and transportation requirements.

[\[federalregister.gov\]](https://www.federalregister.gov), [\[headstart.gov\]](https://www.headstart.gov)

CPLC has significant concerns about proposals affecting:

- Bus monitor requirements under transportation safety regulations.
- Family Service Worker caseload protections.
- Classroom ratios and group size standards.
- Home-based visitation and socialization requirements.

Head Start programs serve children with significant developmental, behavioral, health, and family support needs. Adequate staffing is essential to maintaining safety and quality.

Recommendation

Preserve minimum safety requirements while allowing programs flexibility to justify alternative staffing structures through demonstrated outcomes and community need.

5. Preserve Professional Qualifications and Competency Standards

Current regulations under **45 CFR §§1302.91-1302.93** establish qualification standards for education, family services, health, disabilities, and management personnel.

The Head Start Act has historically supported workforce development and continuous improvement. Head Start programs have become a major pathway into the early childhood profession and contribute to workforce stability and quality.

While CPLC supports flexibility in hiring and recruitment, reductions in qualification requirements should not compromise:

- Child safety
- Program quality

- Fiscal stewardship
- Family services
- Educational outcomes

Recommendation

Maintain competency requirements while expanding alternative pathways and professional development opportunities.

6. Support Local Flexibility for Dual Language Learners and English Acquisition

The NPRM proposes changes to **45 CFR §1302.31, Teaching and Learning Environment**, which would emphasize English-language acquisition and reduce requirements supporting home-language development.
[[federalregister.gov](https://www.federalregister.gov)]

CPLC supports strategies that allow flexibility in how teachers build English proficiency.

Current HSPPS recognize that Dual Language Learners (DLLs) benefit from support in both English and their home language. Existing regulations require culturally and linguistically appropriate practices that support children's learning and family engagement.

The Head Start Act **§641A(a)(1)(F); §640(a)(5)(B)(i); §641A(c)(2)(C); §642B(b)(11)** refers to children who are "limited English proficient," emphasizing that programs must identify, support, and accommodate children who are learning English. The Act uses broad language, leaving significant room for interpretation, requiring that Head Start providers:

- Provide appropriate accommodations for children who are limited English proficient.
- Support staff training necessary to address the challenges of limited English proficient children.
- Review and assess if programs have adequately addressed the needs of limited English proficient children.
- Provide to parents of limited English proficient children outreach and information, in an understandable and uniform format and, to the extent practicable, in a language that the parents can understand.
- Ensure the physical environment is accessible to children with disabilities.



Sixty-five percent (65%) of CPLC children receiving services in Arizona, Texas, New Mexico, and Colorado come from multilingual households. Research demonstrates that bilingualism supports cognitive flexibility, executive function, literacy development, and long-term academic achievement.

CPLC notes that current Head Start standards support Dual Language Learners through culturally and linguistically responsive practices and local flexibility in language supports.

Recommendation

Maintain local flexibility and preserve current requirements that support bilingual staff, home-language development, translation, interpretation, and culturally responsive family engagement.

7. Protect Inclusion for Children with Disabilities

The Head Start Act requires that at least ten percent of enrollment opportunities be available to children with disabilities (**42 U.S.C. §9835(d)(1)**). [[federalregister.gov](https://www.federalregister.gov)]

While the NPRM retains the ten percent enrollment requirement, CPLC is concerned that proposed revisions to disability services requirements could weaken expectations that support inclusion and full participation for children with disabilities. [[federalregister.gov](https://www.federalregister.gov)]

Current regulations under **45 CFR §1302.60** promote:

- Full participation of children with disabilities.
- Individualized support.
- Access to services in the least restrictive environment.

Weakening these provisions risks inconsistent implementation across states and undermines longstanding federal commitments to inclusion.

Recommendation

Retain existing inclusion provisions and strengthen coordination with Local Education Agencies (LEAs) rather than reducing expectations.

8. Preserve Self-Attestation for Vulnerable Families

The NPRM proposes replacing current eligibility requirements under **45 CFR §1302.12** with proposed **§1301.02**, eliminating self-attestation as a means of documenting income, age, or homelessness. [\[federalregister.gov\]](https://www.federalregister.gov)

CPLC urges HHS to maintain self-attestation for limited circumstances involving:

- Families experiencing homelessness as defined by the McKinney-Vento Homeless Assistance Act.
- Families fleeing domestic violence.
- Agricultural workers.
- Families lacking access to formal employment or income documentation.

Current enrollment practices recognize that vulnerable families often cannot produce traditional documentation at the time services are needed. CPLC is concerned that eliminating self-attestation may create enrollment barriers for families experiencing homelessness, domestic violence, farm working families who move based on crop harvesting, or other circumstances that limit access to official documentation.

Recommendation

Retain self-attestation as an allowable form of eligibility verification in limited circumstances when documentation cannot reasonably be obtained and when doing so supports timely access to services for eligible children and families.

9. Protect Administrative Capacity

CPLC is concerned about potential changes to administrative cost limitations under **45 CFR §1301.14**, which limits administrative costs to 5% of total approved program costs.

Effective program management requires adequate investment in fiscal oversight, human resources, technology systems, compliance, workforce recruitment, safety monitoring, and quality assurance. While administrative efficiency is important, insufficient administrative resources can weaken program operations, create workforce challenges, and affect services provided to children and families. Limiting administrative costs to 5% will decimate programs across the nation. Many will be forced to close.

Recommendation

Any revisions to administrative cost limitations should balance fiscal accountability with the operational realities of administering comprehensive Head Start services and should not undermine a program's ability to maintain quality, safety, compliance, and effective program oversight. Administrative costs should remain capped at 15%, ensuring the continuance of quality Head Start programs.

Commented [AM1]: This section needs strengthening without overpowering the other needs. It should still stay last, but needs additional perspective on why reducing administrative costs to 5% is challenging and detrimental to programs.

Conclusion

CPLC supports efforts to reduce unnecessary administrative burden and increase local flexibility. However, we urge HHS to preserve the core components that have made Head Start successful for more than 60 years: comprehensive services, early intervention, family engagement, inclusion, workforce quality, child safety, and equitable access for vulnerable families.

We encourage HHS to adopt an approach that balances flexibility with accountability and continues to support positive outcomes for children, families, and communities as HHS has noted, flexibility is intended to be "permission, not a mandate." CPLC encourages HHS to ensure that flexibility strengthens local innovation while preserving the evidence-based practices that have helped Head Start programs improve outcomes for generations of children and families. [acf.gov], [federalregister.gov]

Commented [am2]: We have urged OHS to carry out our requests up to this point, now we change it to HHS. I would recommend changing all OHS mentions to HHS. (understand OHS sits under HHS, but it reads more consistent to address the same specific agency throughout)

Commented [am3]: same comment as before

Commented [AM4R3]: I agree, thank you

CPLC supports flexibility that strengthens local decision-making while preserving the quality, accountability, and comprehensive services that define Head Start, which is an essential tool for educating our future workforce and leaders, and at the same time allowing parents to be better providers for their families while contributing to the economic development, viability and global competitiveness for our communities, states and nation.

References and Supporting Sources

The comments submitted by CPLC are informed by the Office of Head Start's Notice of Proposed Rulemaking, *Reducing Federal Burden for Head Start Programs* (Docket No. ACF-2026-0595; RIN 0970-AD30), the Head Start Act, current Head Start Program Performance Standards, and research regarding early childhood development, DLLs, family engagement, inclusion of children with disabilities, homelessness, and early intervention services. The NPRM proposes significant revisions to the HSPPS, including increased reliance on state policies, reduced federal requirements, and expanded local flexibility. [federalregister.gov], [headstart.gov]



The perspectives reflected in these comments are further informed by:

- The Head Start Act, as amended by the Improving Head Start for School Readiness Act of 2007;
- Current Head Start Program Performance Standards (45 CFR Chapter XIII);
- Office of Head Start guidance and NPRM Frequently Asked Questions, including the clarification that program flexibility is intended as "permission, not a mandate"; [acf.gov]
- National Head Start Association (NHSA) resources regarding Dual Language Learners and family engagement;
- National Institute for Early Education Research (NIEER) research regarding bilingual development and the impacts of English-only instructional approaches;
- The McKinney-Vento Homeless Assistance Act and federal guidance regarding services for children and families experiencing homelessness; and
- Federal research and guidance regarding developmental screening, early intervention, mental health consultation, and inclusion of children with disabilities.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Alicia Núñez'.

Alicia Núñez
President and CEO
Chicanos Por La Causa