



September 14, 2026

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

RE: Head Start Program Performance Standards, Notice of Proposed Rulemaking [RIN 0970-AD30]

Dear Secretary Kennedy:

We, as members of the Democratic Women's Caucus and House Democratic Caucus, write in strong opposition to the Department of Health and Human Services' (HHS) proposed rule Reducing Federal Burden for Head Start Programs [RIN 070-AD0].¹ This proposed rule would strip the Head Start Program Performance Standards (HSPPS) of more than 90 percent of its standards, likely taking away vital services from children and families.² It eliminates and substantially weakens federal requirements governing early learning, health, mental health, and dental services, safety standards family engagement and family social services, and other services that have defined Head Start for six decades. **This proposed rule guts an essential early childhood program and its services for hundreds of thousands of women and families nationwide, which would increase their costs and burden to replace those services. In today's environment of rising costs, it is cruel to make life more difficult and expensive for these families.**

I. Undermining Congressional Intent

This proposed rule is not modernization. It is the largest rollback of Head Start quality protections in the program's history, and it will fall hardest on low-income children, children with disabilities, dual language learners, and children experiencing homelessness who Head Start was created to serve. The administration claims to be removing red tape and saving money. In reality, this proposed rule would override Congressional intent by removing standards that make Head Start the program that it is today and that Congress explicitly directed HHS to create based on research and consultation with experts.

¹ U.S. Department of Health and Human Services, Administration for Children and Families, "Head Start Program Performance Standards," Notice of Proposed Rulemaking, Aug. 6, 2026.

² Sarah Meek et al., Lowering the Bar: An Analysis of How Replacing Head Start Standards with State Child Care Licensing Weakens Early Learning Across the United States, Children's Equity Project, Arizona State University, 2026.

Congress established Head Start as a comprehensive program that goes beyond child supervision and offers life-changing early education, access to healthcare and food, and works with families to connect them to jobs, education, housing, and other social services that strengthen families. Since its founding, Head Start has served over 40 million families and children.³ Congress directed HHS to establish evidence-based performance standards covering education, health, nutrition, parental involvement, and social services, because these high-quality services are all important for helping achieve Head Start’s goal of promoting school readiness and helping children succeed in school and beyond. Children’s well-being should not depend on the state in which a child happens to live.⁴ Preserving the statutory shell of Head Start while removing the federal standards that give those requirements meaning would undermine congressional intent and diminish the quality of services for women and families who rely on Head Start.

II. Compromising Program Consistency

The program’s federal to local foundation—that this proposed rule seeks to diminish—is critical to achieving Head Start’s mission to provide quality care no matter where the child lives. Head Start works because of its nationwide standards, not despite them. Rigorous research has found that Head Start generates substantial long-term economic benefits, including an estimated \$1.86 in benefits for every dollar invested.⁵ That return depends on strong teachers, strong ratios, and strong services—qualified staff, appropriate classroom size and teacher to child ratios that support learning, developmental screening and follow-up, health and mental health services, family engagement and support services, and evidence-based early learning—not a patchwork of state requirements that would create different standards throughout the country.

III. Eroding Quality and Safety

The proposed rule would eliminate Head Start’s specific federal requirement that children be supervised at all times, reduce mandatory annual staff training on preventing abuse and neglect, repeal the prohibition on corporal punishment, shaming, humiliation, and seclusion practices, and remove the timelines that ensure a child’s developmental, dental, and medical needs are actually screened and followed up on.

The proposed rule would not only poorly impact children, it would further harm the Head Start workforce by changing teacher-child ratios and class sizes. The Department’s own analysis assumes this rule will let programs put 16 to 32 percent more children in front of each teacher, and HHS is counting on that to book \$668 million a year in “savings.” The Children’s Equity Project found that approximately 80 percent of children currently enrolled in Head Start could face larger class sizes and worse teacher-child ratios if programs defaulted to state requirements instead of the current federal requirements.⁶ That means these children would be in larger

³ National Head Start Association. (2026). *2026 state and national fact sheets*. [National Head Start Association](#).

⁴ 42 U.S.C. § 9836a.

⁵ National Academies of Sciences, Engineering, and Medicine, Closing the Opportunity Gap for Young Children (2023), summarizing Patrick Kline and Christopher R. Walters, “Evaluating Public Programs with Close Substitutes: The Case of Head Start,” *Quarterly Journal of Economics* 131, no. 4 (2016): 1795–1848. The National Academies reports an estimated marginal value of public funds of 1.86 for Head Start, meaning approximately \$1.86 in benefits for every \$1 invested. <https://doi.org/10.17226/26743>.

⁶ Meek, S., Blevins, D., Alexander, B., Powell, T., Soto-Boykin, X., & Cardona, M. (August 2026). *Lowering the Bar: An Analysis of How Replacing Head Start Standards with State Child Care Licensing Weakens Early Learning*

classroom sizes without additional teacher assistance. Fewer teachers per child is not simply a matter of flexibility. It means fewer adults available to provide individualized attention, support learning, respond to developmental needs, and keep children safe.

These proposed changes also come after HHS released a rule in 2024, “Restoring Flexibility to Support Head Start Program Access [RIN 0970-AD21].” RIN 0970-AD21 repealed the higher wages and improved benefits established for Head Start staff in 2024. This new proposed rule would increase Head Start staff’s workload without additional pay or benefits to reflect the greater stress. Both rules result in more work and less pay for the Head Start workforce at a time when staffing challenges are prevalent.

The proposed rule would also rollback Head Start’s requirement for certain staff qualifications. Specifically, the rule would remove the minimum required qualifications for program directors, classroom coaches, and disability management staff. For education staff, the rule would eliminate requirements for training on curriculum, behavior management, disability student support, and dual language learner support. Head Start’s federal requirements implement these qualifications and training to protect the integrity of each classroom across the country. Weakening Head Start’s federal workforce and credentialing standards would further reduce classroom quality, at the very time programs are already struggling to recruit and retain qualified educators. It is critical to equip Head Start staff with the necessary skills to sustain Head Start’s comprehensive, high-quality educational programming.

IV. Rolling Back Student Support Systems

This proposed rule would strip Head Start’s ban on expelling children and its strict limits on suspension which is deeply concerning. These protections exist because preschoolers are already suspended and expelled at rates far above K-12 students. Additionally, disparities in suspension and expulsion are already significant for children of color, boys, and children with disabilities. Federal data show that children of color account for a disproportionate share of preschool suspensions, while children served under *Individuals with Disabilities Education Act* (IDEA) make up 23 percent of enrollment but 74 percent of expulsions.⁷ Removing these federal protections will not close those gaps. It will widen them.

The proposed rule would also substantially change how Head Start programs support children who are learning English. It would require Head Start instruction to be conducted in English, with an exception for Tribal programs. This action would reverse dual-language and home-language supports that have been part of the standards since 1975—even though the evidence consistently shows dual language learners in Head Start make larger gains than their English-speaking peers when supported in both languages.⁸ The Department’s own estimate puts the cost

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 U.S. Department of Education, Office for Civil Rights, 2021–22 Civil Rights Data Collection: A First Look Report (Jan. 2025). <https://www.ed.gov/media/document/crdc-overview-informational-snapshot-january-2025-109174.pdf>

⁸ Administration for Children and Families. (2026, August 7). Reducing federal burden for Head Start programs. Federal Register, 91. <https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>.

of this single mandate at nearly \$240 million, including real harm to Head Start teachers who will lose their jobs.⁹ We should not weaken an evidence-based practice that helps children build English proficiency while maintaining the language skills they develop with their families and sets a strong foundation for them to succeed in school.

V. Conclusion

It is vital that Head Start has an uncompromised framework of established quality standards. It needs the Department to fund what already works and to ensure programs have the resources and workforce necessary to meet the standards Congress established. We urge HHS to withdraw this proposal in full.

Sincerely,



Teresa Leger Fernandez
Chair
Democratic Women's Caucus



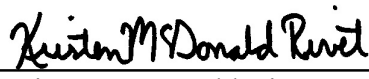
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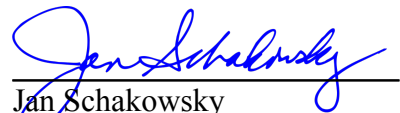
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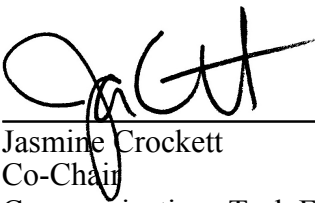
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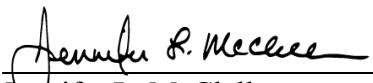
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⁹ Meek, S., Blevins, D., Alexander, B., Powell, T., Soto-Boykin, X., & Cardona, M. (August 2026). *Lowering the Bar: An Analysis of How Replacing Head Start Standards with State Child Care Licensing Weakens Early Learning Across the United States*. The Children's Equity Project at Arizona State University.

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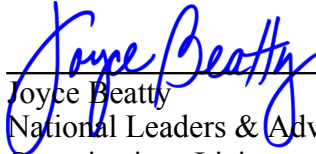
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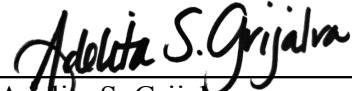
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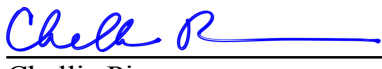
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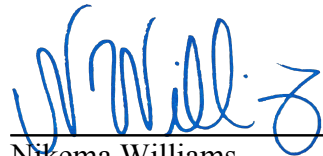
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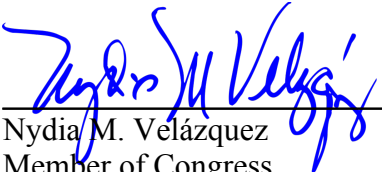
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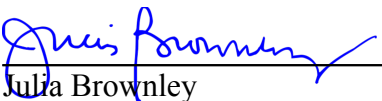
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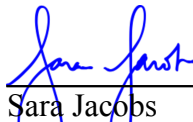
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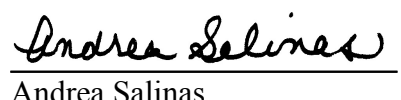
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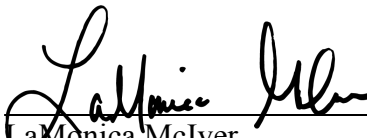
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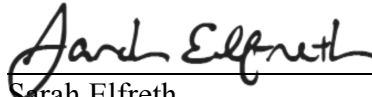
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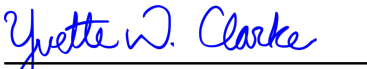
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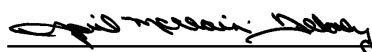
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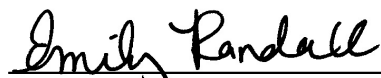
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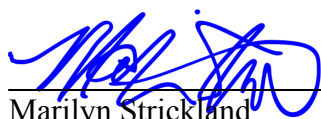
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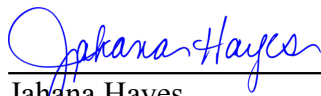
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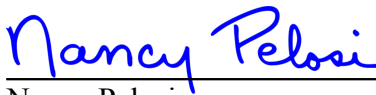
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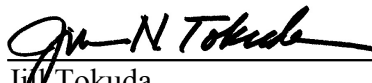
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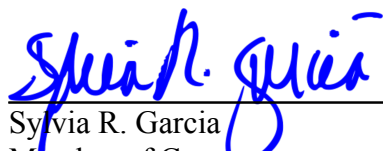
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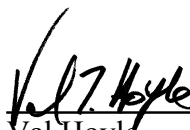
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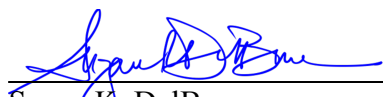
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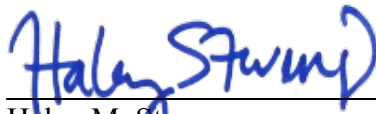
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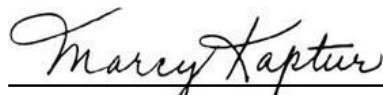
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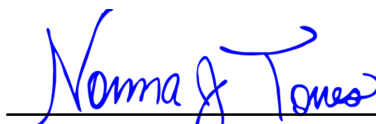
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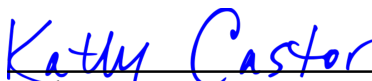
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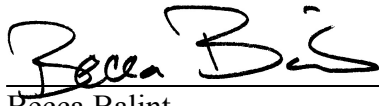
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Steven Horsford
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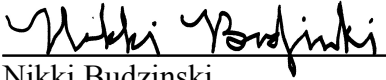
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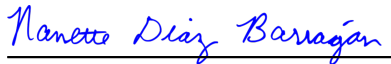
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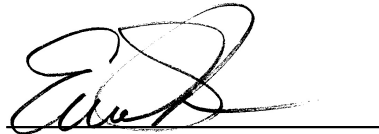
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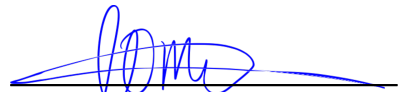
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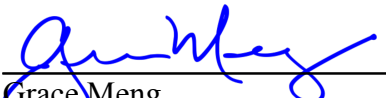
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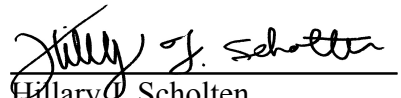
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Member of Congress



Grace Meng
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Luz M. Rivas
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Angie Craig
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