

Submitted to: Administration for Children and Families

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Public Comment on the Notice of Proposed Rulemaking (NPRM) on Reducing Federal Burden for Head Start Programs

The New York Early Childhood Professional Development Institute (PDI) submits this comment in firm opposition to the Administration for Children and Families' Notice of Proposed Rulemaking, Reducing Federal Burden for Head Start Programs.

PDI works to strengthen New York's early childhood workforce, improve program quality, develop early childhood leaders, and support the effective implementation of early childhood policies and systems. Our work gives us a direct view of the conditions necessary for early childhood programs to serve children and families well: knowledgeable and supported educators, manageable group sizes, developmentally appropriate teaching, meaningful partnerships with families, inclusive services, and strong connections to health, mental health, and developmental supports.

The proposal's changes do not benefit children

A rule governing an early childhood program should be evaluated first by its effect on children. HHS states that the purpose of the proposed rule is to reduce federal burden, defer to state policies where possible, restore local control, and recognize parents as primary caregivers and decisionmakers. However, the rationale presented in the proposed rule focuses largely on administrative and governance considerations rather than on how the proposed changes would affect children and families.

Head Start was established as a comprehensive program addressing the educational, health, nutritional, developmental, and social needs of children from families with low incomes. Its design was informed by experts across multiple disciplines, including child development, psychology, education, and medicine.

Over the course of six decades, Head Start has served more than 35 million children and generated a substantial body of research demonstrating positive lifelong impacts for children, families, and communities. The question before HHS should not be whether regulations can be reduced, but whether reducing them advances the mission and effectiveness of the program.

The NPRM would gut Head Start's comprehensive model

Head Start was not created simply to provide child care. Its statutory purpose is to promote children's school readiness by supporting their cognitive, social, and emotional development and by connecting early education with health, nutrition, social services, and family support. The current Performance Standards translate that model into practice. They specify what programs must do to provide developmentally appropriate education, identify children's health and developmental needs, engage parents and caregivers, serve children with disabilities, support multilingual children, protect child safety, and connect families with essential services. They also give ACF a basis for monitoring grantees and holding them accountable.

The NPRM would remove many of those requirements while leaving programs to interpret broad statutory language on their own. Labeling this as "flexibility" does not change its effect. Flexibility concerns how programs meet standards. This NPRM would eliminate the standards themselves.

Larger classes, fewer educators, shorter days, and fewer developmental, health, and family supports are not administrative efficiencies. They are program cuts.

The NPRM appears incompatible with the Head Start Act

The NPRM fails to demonstrate that its changes comply with federal law.

Section 641A(a)(2)(C) of the Head Start Act directs the HHS Secretary to ensure that revisions to the Performance Standards do not eliminate or reduce the "quality, scope, or types" of health, educational, parental involvement, nutritional, social, or other services required under the standards.

The proposed rule would remove or weaken numerous requirements in the standards, including requirements related to ratios and group sizes, health services, developmental screening, child safety, family engagement, services for expectant families, supports for children with disabilities, and appropriate services for children whose home language is not English.

The Head Start Act also directs the Secretary to establish standards in areas including education, health, nutrition, parent involvement, services for dual language learners, facilities, and administrative and fiscal management. In many instances, the NPRM would replace federal standards with local discretion rather than fulfill the Secretary's responsibility to establish them.

The NPRM contradicts its own goals regarding family choice and engagement

The NPRM states that it seeks to strengthen parental authority and recognizes parents as children's primary teachers and decisionmakers. Yet the proposal includes provisions that would require instruction to be conducted in English and suggests reliance on artificial intelligence translation tools to support communication with families.

Meaningful family engagement requires more than translation of documents; it depends upon communication, cultural responsiveness, and opportunities for children to maintain and build upon their home language while acquiring English.

According to the First Five Years Fund, more than a third of children served by Head Start are dual language learners. The proposal would replace existing requirements that support English acquisition through developmentally appropriate, culturally and linguistically responsive teaching. It would eliminate the home-language focus for infants and toddlers, bilingual approaches for preschoolers, classroom supports when educators do not speak a child's home language, and provisions for screening and assessing children in the language most likely to produce valid information.

The English-only requirement is not a burden-reduction measure. It is a new federal mandate aimed directly at exerting control over Head Start classroom instruction.

The proposal would reduce parents' authority rather than restore it

HHS claims that the NPRM recognizes parents as children's primary teachers and strengthens opportunities for families to make meaningful decisions. The rule's actual provisions do the opposite.

The NPRM would remove or weaken:

- required Parent Committees;
- mediation procedures for disputes between Policy Councils and governing bodies;
- reimbursement for eligible costs associated with parent participation;
- parent conferences and home visits;
- open-door policies;
- opportunities for parents to provide input on curricula; and
- structured family partnership agreements, goal setting, follow-up, and progress review.

Parents do not gain power when their formal rights, participation structures, and instructional choices are eliminated. HHS should retain the operational requirements that make parent governance and family partnership meaningful.

Weakening workforce standards would weaken Head Start quality

PDI opposes the provision restricting programs from requiring or incentivizing postsecondary education unless a credential is specifically required by statute or the program proves that the position's skills can only be acquired through postsecondary study. This provision creates uncertainty about whether programs could continue offering scholarships or other incentives for educators pursuing credentials and degrees.

The administration's own analysis of the NPRM assumes a 6% reduction in current average salaries and a 32% increase in the average number of children each teacher will serve. At a time when the demand for attracting and retaining qualified educators has never been higher, this move is not supported by research and is not good for children.

Removing comprehensive-service requirements would leave children's needs unmet

PDI opposes the elimination of detailed requirements for developmental screening, health and dental services, mental health consultation, and maternal and infant health. Broad promises of comprehensive services are insufficient without specific operational requirements as laid out in the standards. Eliminating these requirements does not eliminate children's medical, dental, developmental, and mental health needs. It only eliminates clear responsibility for responding to them.

Programs may need flexibility in choosing partners and delivery models, but children's access to comprehensive support must not depend on local discretion.

The NPRM would erect new barriers for children facing the greatest instability

The proposal would weaken access and protections for children experiencing homelessness, children in foster care, and children with disabilities.

It would eliminate specific recruitment and enrollment procedures, the ability to reserve a limited number of slots for children experiencing homelessness or foster care, continuity protections when families move, and the use of self-attestation in circumstances in which families cannot produce conventional documentation.

A family experiencing homelessness may not have ready access to income records, identification, leases, or other documents. A prohibition against self-attestation would not reduce burden. It would impose a new burden on the families least equipped to satisfy it and on programs attempting to reach them.

The NPRM would also remove Head Start-specific requirements to accommodate children with disabilities, support children awaiting evaluations, and prevent programs from denying enrollment because of a disability or chronic health condition. It would remove existing safeguards on suspension and the prohibition on expulsion, leaving only general references to other state and federal laws.

These changes would not promote equitable access. They would make access less certain for the children most likely to benefit from Head Start's comprehensive services.

Eliminating federal child-safety standards is indefensible

The NPRM would remove federal standards of conduct that explicitly prohibit corporal punishment, physical abuse, sexual abuse, emotional abuse, humiliation, shaming, seclusion, and neglectful behavior. It would also remove the federal requirement that children not be left alone or unsupervised, as well as requirements for annual training on mandated reporting and appropriate behavior-support practices.

Deferring these matters entirely to state and local requirements creates uneven protections. State definitions and child care regulations differ, and not every harmful practice prohibited under the current Head Start standards necessarily meets a state's criminal definition of abuse.

A federal early childhood program should maintain an unequivocal national standard that children will not be subjected to abusive, neglectful, or unsafe treatment.

Standards protecting children from harm are not regulatory overreach. They are among the most basic responsibilities of the federal agency administering Head Start.

The loss of common federal standards would undermine accountability

The NPRM leaves major questions unanswered about how ACF would define, measure, and monitor quality after eliminating more than 50 existing standards.

Head Start cannot maintain national accountability without meaningful national standards. HHS should explain how it would evaluate educational quality, comprehensive services, equity, child safety, and family engagement before proposing to remove the standards currently used to define them.

Conclusion

Head Start's standards have implications beyond Head Start itself. They establish expectations for early childhood teaching, workforce preparation, inclusive practice, family engagement, comprehensive services, and program quality across the broader field. Weakening them would lower the national benchmark precisely when children, families, and early childhood programs need stronger public systems and a more stable workforce. The federal government should strengthen that model, not dismantle it.

Thank you for the opportunity to comment.