All Our Kin

October 6, 2026

The Honorable Robert F. Kennedy, Jr.
Secretary of United States Department of Health and Human Services
Washington, D.C. 20528

RE: Comment on Reducing Federal Burden for Head Start Programs (RIN: 0970-AD30; Docket ID: ACF-2026-0595)

We are writing in response to the Department of Health and Human Services' (HHS, or the Department) Notice of Proposed Rulemaking (NPRM) to express our strong opposition to the changes regarding the Head Start Program Performance Standards (HSPPS, or the Standards), published in the Federal Register on August 7, 2026.

All Our Kin is a national organization that provides educational mentorship, professional development, and systems-building support to family child care educators. We provide direct support to family child care educators in Connecticut and New York City, and have worked with 34 states on systems-building. All Our Kin's Early Head Start program in Connecticut works with family child care educators and partners to deliver comprehensive Early Head Start services to families with infants and toddlers.

We strongly urge the Department to withdraw the proposed regulation in its entirety. The proposed rule eliminates 90% of the Standards, which programs, families, and communities have relied on for decades to ensure that HSPPS provide consistent high-quality, comprehensive early childhood education and supports that meet the needs of young children and their families. It risks creating increased confusion for programs, reducing the quality of educational opportunities and comprehensive supports, and creating poorer working conditions for early childhood educators.

The changes to the Standards in this proposed rule will risk real harm for children, families, and early childhood educators. Importantly, the harms discussed herein will occur because of the proposed changes to the Standards, even where the Head Start Act continues to impose obligations on Head Start agencies.

The proposed rule would further strain the already under-resourced family child care workforce by increasing educator stress, burnout, turnover, and program closures. It would also weaken supports for educators and remove language-access protections that help families communicate with providers and ensure multilingual children can fully participate in early learning. These changes risk undermining the quality, stability, cultural responsiveness, and accessibility of family child care programs.

Weakening Head Start Standards Would Negatively Impact the Quality of Programs and Children's Health, Safety, and Learning Outcomes

This proposal would:

- Increase child-teacher ratios by allowing HS to follow weaker state child care licensing requirements, risking leaving 80% of children in HS with larger class sizes and less individualized attention, while reducing the size of the workforce and placing additional burden on teachers who stay..
- Weaken comprehensive services by removing clear requirements around timing and delivery of developmental screenings and mental health consultations and increasing caseloads for family service workers and home visitors.
- Lower credentialing and educational requirements for some educator and staff roles and remove training and coaching requirements, undermining the relationship between teacher preparation, ECE quality, and educator compensation and retention. The Administration projects savings based on programs having to pay staff less with reduced qualifications and credentials.

Children enrolled in the Early Head Start (EHS) program receive ongoing support for their health and wellbeing as well as their social, behavioral, physical, emotional, and cognitive development. In addition to high-quality, full-time child care services, families receive assistance in obtaining physical, mental, and oral health services for their children as well as housing, food, and income referrals. EHS provides vital access to these services, which is particularly critical in the first three years of life, when 80%[1] of a child's brain develops. Children enrolled in EHS are more likely[2] to receive immunizations and receive support services for a diagnosed disability.

Research tells us that high-quality early learning environments are defined[3] by responsive, consistent relationships between children and a caregiver/educator. The low child to teacher ratios of the current Standards are an essential conduit to creating those responsive relationships and ensuring high-quality care, especially in mixed-age settings that are more often in family child care programs. The proposed increase of ratios would create significant challenges to providing the same opportunities for learning for all children, and would be especially detrimental for

---

[1] *Brain Architecture: An ongoing process that begins before birth*. (2026, March 19). Center on the Developing Child at Harvard University. https://developingchild.harvard.edu/key-concept/brain-architecture/

[2] Kaneb, N. (2026, September 11). *Proposed head start rule would further undermine child and family health*. Center for Children and Families. https://ccf.georgetown.edu/2026/09/11/proposed-head-start-rule-would-further-undermine-child-and-family-health/

[3] Alexander, B., Meek, S., Blevins, D., Cardona, M., The Children's Equity Project at Arizona State University, Eric Martinez, & Powell, T. (2026). Ratios and group sizes in Head Start and States: Implications for children, families, and the workforce. In *The Children's Equity Project at Arizona State University* (p. 2). https://cep.asu.edu/sites/g/files/litvpz916/files/2026-10/Ratios%20and%20Group%20Sizes%20in%20Head%20Start%20and%20State%20Child%20Care%20Licensing%20Implications%20for%20Children%2C%20Families%2C%20and%20the%20Workforce%20%289%29.pdf

children with disabilities, those who are experiencing homelessness, and children with other needs that require extra time and attention to support learning.

Not only do higher child ratios negatively impact the quality of care that children receive, but they also increase educator stress[4] and can lead to educator burnout, which compounds the ongoing staffing challenges, especially amongst family child care educators, who continue to identify staffing challenges as one of their top challenges[5].

Removing Protections for Children with Disabilities, Families Experiencing Homelessness, and Bilingual Families Prevents Children from Thriving

This proposal would:

- Remove clear protections and requirements around accommodating children with disabilities and their families critical to supporting them in thriving inclusive settings, including requirements to provide supports and services to children before they are deemed to be eligible for IDEA.
- Roll back child suspension and expulsion restrictions, placing children at risk for removal from HS and unable to access other ECE options. This includes eliminating regulations that require programs to not turn away children because of disabilities.
- Eliminate families' abilities to use self-attestation to enroll in HS, placing more barriers for families experiencing homelessness and others who may lack formal income documentation while creating additional administrative burdens for programs.
- Require English-only instruction (with exceptions for some Tribal programs), eliminating the requirement to communicate with families in their own language and provide linguistically appropriate services.

The current Standards require that all children must be screened for developmental delays and disabilities within 45 days of enrollment. Nationally, only about a third[6] of all children are screened for developmental delays and disabilities, and children who are experiencing poverty are even less likely to receive these screenings. The first years of life are a robust period of brain development and growth, and the sooner a delay or disability is identified, the sooner a child can receive

---

[4] Alexander, B., Meek, S., Blevins, D., Cardona, M., The Children's Equity Project at Arizona State University, Eric Martinez, & Powell, T. (2026). Ratios and group sizes in Head Start and States: Implications for children, families, and the workforce. In *The Children's Equity Project at Arizona State University* (p. 2). https://cep.asu.edu/sites/g/files/litvpz916/files/2026-10/Ratios%20and%20Group%20Sizes%20in%20Head%20Start%20and%20State%20Child%20Care%20Licensing%20Implications%20for%20Children%2C%20Families%2C%20and%20the%20Workforce%20%289%29.pdf

[5] National Childcare Authority. (n.d.). Childcare workforce: staffing challenges and provider burnout. https://nationalchildcareauthority.com/childcare-workforce-and-listing-burnout/

[6] New America. (2026, September 18). *Current Head Start Program Performance Standards Protect Children with Disabilities - New America*. https://www.newamerica.org/insights/current-head-start-program-performance-standards-protect-children-with-disabilities/?utm_medium=email&utm_source=sfmc&utm_campaign=10012026_BabyMonitor

therapies and services that will improve their capacity to learn and succeed throughout their entire life. The proposed rule would eliminate this screening requirement, creating considerable barriers for children to receive the care and resources that they need in order to succeed in school and life.

Even more concerning, the proposed changes would remove a requirement to serve all eligible children who have disabilities. A 2024 report [7]from the US Government Accountability Office found that parents of children with disabilities have a particularly difficult time locating child care for their children, which often causes parents to reduce their hours of employment or leave the workforce entirely. For thousands of families in low-income households across the county, the proposed rule would eliminate the *only* free early education option for their child with delays and/disabilities, creating detrimental impacts on children, families, and communities.

Foundational to Head Start's mission and values, is a holistic approach to family support, with policies that are inclusive of children and families of diverse abilities, backgrounds, and languages. Many parents prefer[8] family child care programs because of the cultural and linguistic diversity that many programs offer, as well as the cognitive, academic, and economic benefits[9] that are associated with bi/multi-lingual education and care. The proposed English-only instruction would deny children the opportunity to reap the academic, cognitive, and economic benefits that are associated[10] with bilingual instruction. Additionally, the proposed would impair one of the unique strengths of family child care, leaving families struggling to communicate with educators and positioning bi/multi-lingual children at a significant disadvantage in their educational journey.

Creating Worse Working Conditions for Head Start Educators Would Further Destabilize the Workforce and Decrease Slots for Children

This proposal would:

- Require increased staff-child ratios and group sizes for educators with reduced support, increasing workplace burden and risking pushing educators out of the ECE field.

---

[7] Curda, Elizabeth (September, 2024). Child Care Accessibility: Agencies Can Further Coordinate to Better Serve Families with Disabilities. U.S. Government Accountability Office. https://https://www.gao.gov/assets/gao-24-106843.pdf

[8] New America. (2026b, February 17). *Supporting linguistically diverse family child care providers - New America*. https://www.newamerica.org/insights/supporting-linguistically-diverse-family-child-care-providers/

[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. https://cep.asu.edu/resources/An-Analysis-of-How-Replacing-Head-StartStandards-with-State-Child-Care-Licensing-Weakens-Early-Learning-Across-the-United-States

[10] Soto-Boykin, X., Meek, S., Cardona, M., & Williams, C. (August, 2026). 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-headstart.

- Eliminate requirements for breaks for HS staff, alongside required mental health supports, adding to existing burnout and worsening workplace conditions.
- Remove requirements that programs provide research-based coaching for education staff, reducing clarity and consistency around program support and professional development.
- Combined with a June 2026 proposal to prevent compensation and benefit increases for HS staff, lead to reduced compensation for staff.

Early childhood educators are among the most underpaid workforces, with long hours and low pay resulting in ongoing high turnover rates and staffing shortages across the country[11]. Within an already under-resourced field, family child care educators are more likely[12] than their center-based counterparts to qualify for Medicaid, and SNAP, and lack any retirement benefits. Without requirements in place to support staff with breaks, professional supports, and coaching, the proposed rule will add even more stressors onto an already taxed workforce, risking an increase in staff turnover and program closures in a field that is already struggling to survive.

The current Standards for family child care educators in Early Head Start programs foster characteristics that are associated with high quality[13], including specialized trainings, participation in professional development organizations, connection with other family child care educators, and access to mental health and wellness supports. The Standards ensure that educators have the professional and holistic supports needed to provide the high-quality care that Head Start is known for; without such resources, the widespread shortages of care that families need will increase and risk further destabilizing other parts of the nation's child care system.

Head Start is a proven, effective program that supports children's early learning and provides vulnerable families with critical supportive resources—but it depends on a stable, qualified workforce in order to provide those high-quality services. Demanding workloads, low compensation and lack of benefits, and lack of professional recognition have all worked in tandem to strain the Head Start system and impede its ability to meet demand.

Conclusion

For decades, Head Start has been regarded as the gold standard of early childhood care and comprehensive family support that foster healthy child development and growth, support parental health and emotional wellbeing, support parents' ability to work, and maximize a child's lifelong

[11] National Childcare Authority. (n.d.-b). *Childcare workforce: staffing challenges and provider burnout*. https://nationalchildcareauthority.com/childcare-workforce-and-listing-burnout/

[12] National Association for the Education of Young Children. (2026). *Unique Strengths and Unique Strains: Exploring Workforce Survey Data on Home-Based Child Care*. https://nafcc.org/wp-content/uploads/2026/08/Unique-Strengths-and-Unique-Strains_Exploring-Workforce-Survey-Data-on-Home-Based-Child-Care.pdf

[13] Osgood-Roach, I., Wevers, K. (June, 2018). "Everybody Benefits": Family Child Care Providers' Perspectives on Partnering with Early Head Start. All Our Kin. https://https://allourkin.org/files/galleries/WhitePaper-Dec2018-final-web.pdf.

learning potential. The research[14] is clear, Head Start is one of the most effective programs to help mitigate the devastating impacts of childhood poverty.

Additionally, the Standards serve as a national guidepost for quality, impacting the early care and learning ecosystem into early childhood education and care programs beyond HS. Undoing these standards will lower the quality bar all the way to the floor, and exacerbate educational and developmental gaps which will overtax the K-12 school system, and place greater demand on school districts.

We urge the Department to immediately withdraw its current proposal and instead dedicate its efforts to advancing policies consistent with the statute that strengthen—rather than undermine—the ability of Head Start to effectively prepare children from low-income households to succeed in school through its evidence-based comprehensive services model.

The proposed rule poses great risk to the fidelity and viability of HS, which will increase the likelihood of program closures, setting off a chain of events that will result in child care loss for parents, risking missed work, unemployment, forced dropouts from school and training programs, and create economic insecurity for millions of families. Parents' and caregivers' loss of access to HS services will also cause instability for employers, many of which cannot meet their staffing needs unless workers have reliable access to childcare, which will exacerbate the economic impact of the ongoing child care shortage, which costs $172B[15] in lost earnings and productivity every year.

Communities across the county rely on Head Start to provide high-quality care, comprehensive health and wellness services, and family support services to children and families who are the furthest from opportunity. We urge the Department to reaffirm their commitment to supporting the educational opportunities, health and developmental growth, and economic opportunity of parents across the country; our children deserve every opportunity for success.

Sincerely,

Jessica Sager
Co-Founder and Chief Executive Officer
All Our Kin

---

[14] 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. https://cep.asu.edu/resources/An-Analysis-of-How-Replacing-Head-StartStandards-with-State-Child-Care-Licensing-Weakens-Early-Learning-Across-the-United-States

[15] Belfield, Ph. D. (2026). The Child Care Crisis Costs the U.S. Economy $172 Billion Each Year: Impact on families & employers is escalating. In *www.instituteforchildsuccess.org/cost-child-care-crisis*.