

October 6, 2026

Submitted via www.regulations.gov

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

Re: ACF-2026-0595; Reducing Federal Burden for Head Start Programs

Secretary Kennedy:

On behalf of the approximately three million members of the National Education Association (NEA), we submit these comments in strong opposition to the Department of Health and Human Services' (HHS') Notice of Proposed Rulemaking (NPRM), *Reducing Federal Burden for Head Start Programs*, published in the Federal Register on August 7, 2026. The proposed rule would rescind and replace the Head Start Program Performance Standards (HSPPS) adopted in 2024 and would substantially reduce the scope of federal regulatory requirements, including deference to state policies on matters such as group size and staff-to-child ratios.¹

Our members include Head Start educators employed by school districts, prekindergarten teachers, K–12 educators, education support professionals, special educators, and other professionals serving young children and families. **We strongly urge HHS to withdraw this NPRM and to preserve strong national HSPPS, reflect the research on high-quality early childhood education, and recognize the professional expertise and working conditions necessary for educators to support children's learning and development.**

The NPRM identifies reducing administrative burden, eliminating regulatory duplication, and increasing state and local flexibility as central purposes of the proposed rule.² NEA recognizes that federal programs must periodically review administrative requirements to eliminate unnecessary

¹ <https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

² <https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

duplication and improve implementation. However, the relevant question is whether the proposed reductions distinguish between genuinely duplicative administrative requirements and substantive standards that establish the conditions necessary to deliver high-quality Head Start services. The NPRM does not provide sufficient evidence or analysis to demonstrate that each proposed rescission would reduce unnecessary burden without weakening service quality, child protections, or accountability.

The Head Start Act places a statutory limitation on revisions to the Performance Standards.³ Section 641A(a)(2)(C)(ii) of the Act, 42 U.S.C. § 9836a(a)(2)(C)(ii), requires the Secretary to ensure that revisions to the standards do not result in the elimination of or any reduction in the quality, scope, or types of services required under the standards as in effect on December 12, 2007. HHS should therefore explain how the proposed rescissions and substitutions of state and local requirements would comply with this statutory baseline, including whether any proposed changes would permit requirements below those established by the 2007 standards. This analysis is particularly important where the proposed changes would replace federal requirements with state or local standards that are less protective than the federal requirements that were in effect in 2007, including requirements governing staffing and group size, and where the proposed changes could otherwise reduce the quality, scope, or types of services required under those standards.

The proposed rule's broad substitution of state and local requirements for federal Head Start standards is particularly concerning. State child care licensing systems serve an important health, safety, and operational function, but they are not designed to serve as a comprehensive framework for early learning, child development, family engagement, disability inclusion, or school readiness. Head Start standards serve a different and complementary purpose: establishing program-wide expectations for the comprehensive educational, developmental, health, family, and other services that Head Start provides. The quality of a child's Head Start experience must not depend on the state or ZIP code in which that child happens to live.

The NPRM Conflicts with NEA's Commitment to High-Quality Early Childhood Education

NEA supports federal assistance for Head Start and other early childhood education programs and supports early childhood education services provided by qualified personnel. NEA policy also recognizes that high-quality, developmentally appropriate prekindergarten supports children's cognitive, social-emotional, linguistic, physical, and academic development.⁴ NEA supports federal programs that facilitate and enhance school readiness and federal assistance for early childhood education programs, including Head Start.

NEA further believes that excellence in the classroom is best achieved through small class sizes and adequate staffing and that early childhood educators require additional adult support because of the

³ 42 U.S.C. § 9836a(a)(2)(C)(ii).

⁴ <https://www.nea.org/nea-today/all-news-articles/quality-preschool-more-abcs>

developmental, health, safety, and instructional needs of young children. Smaller classes also allow educators to provide more individualized attention and support safe, positive learning environments.

The proposed rule moves in the opposite direction by creating opportunities for existing federal standards to be replaced by widely varying state requirements. Instead of weakening federal expectations, HHS must establish a strong national foundation while allowing states and local programs to exceed those standards.

The proposed rule would also reduce federal requirements concerning curriculum implementation. High-quality early childhood education is not simply a matter of complying with health and safety requirements; it requires intentional, developmentally appropriate instructional practices grounded in child development and designed to support children's language, literacy, mathematics, social-emotional development, and other areas of learning. NEA recommends retaining clear federal expectations for developmentally appropriate educational practices while allowing programs appropriate flexibility in selecting and implementing curricula that meet those expectations.

State Licensing Is Not a Substitute for Head Start Quality Standards

The distinction between licensing and program quality is fundamental.

State child care licensing establishes regulatory requirements governing the operation of licensed child care programs; those requirements serve an important health, safety, and operational function but are not necessarily interchangeable with the comprehensive performance standards applicable to federally funded Head Start programs. The NPRM itself recognizes that the proposed shift would place states in a substantially greater role in determining requirements traditionally addressed by federal Head Start regulations. Replacing federal standards with state requirements therefore risks replacing a consistent national quality floor with substantially different standards and expectations across states.

This is not an argument against state authority or innovation. States and local programs must be free to exceed federal Head Start standards and respond to local needs. But state flexibility must not come at the expense of a federal floor that ensures children participating in a federally funded program receive meaningful protections regardless of where they live.⁵

The NPRM also relies on projected reductions in administrative, staffing, and other program expenditures as a principal quantified benefit of the proposed rule. HHS estimates annual quantified impacts at full implementation ranging from approximately \$1.5 billion to \$3.0 billion, with a primary estimate of approximately \$2.2 billion, and projects that some reductions could support additional funded slots.⁶ HHS must also explain how the proposed reduction in the administrative cost cap from 15 percent to 5 percent would affect programs

⁵ 42 U.S.C. § 9836a(a)(1); 45 C.F.R. § 1302.30.

⁶ <https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

that currently exceed the proposed cap, including whether compliance would require reductions in personnel, infrastructure, data systems, training, supervision, or other functions that support direct services.⁷ HHS must identify the extent to which its projected savings depend on such reductions rather than on genuine elimination of unnecessary administrative work.

Those estimates must not be treated as equivalent to demonstrated improvements in program efficiency or child outcomes. HHS itself characterizes some of these amounts as reallocations within Head Start rather than reductions in overall program funding. The analysis must distinguish clearly between reductions in administrative burden, reductions in staffing or service-delivery expenditures, transfers or reallocations within Head Start, and actual improvements in program efficiency. If HHS proceeds with the proposed rule, the Department must provide, before taking further action, sufficient detail for commenters and the public to evaluate how each major regulatory change contributes to the projected savings and whether those savings could come at the expense of staffing, services, quality or working conditions.

The limitations of state deference are particularly apparent where federal law establishes protections intended to operate across state and local boundaries. Children and families experiencing homelessness, for example, may move between service areas or states and may encounter different enrollment and documentation requirements. A federally funded program must not make access to federally guaranteed services contingent on which state or local system a family encounters at a particular point in time.

Protect Small Group Sizes and Appropriate Teacher-Child Ratios

Appropriate staff-to-child ratios and group sizes are essential to working and learning conditions. They affect educators' ability to supervise children safely, individualize instruction, respond to behavioral and developmental needs, communicate with families, and recognize when a child may require additional support.

The proposed rule would replace federal Head Start ratios and group-size limits with state and local requirements.⁸ The Children's Equity Project's analysis, *Lowering the Bar*, compared state child care licensing standards with the HSPPS and found substantial differences between the two systems.⁹ The analysis reports that 47 states and the District of Columbia have weaker licensed child care ratios for two-year-olds than the applicable Head Start standard, and that 97 percent of two-year-olds in Early

⁷ <https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

⁸ <https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

⁹ <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>

Head Start would be in jurisdictions with worse teacher-to-child ratios if programs were required to follow state licensing standards instead.¹⁰

The differences can be substantial. For example, in Mississippi, state licensing permits one adult to be responsible for 12 two-year-olds, while the applicable Head Start standard permits one adult for four children.¹¹ Thus, the number of children assigned to each adult would be three times as large under the state ratio. Such a change would reduce the amount of adult attention available per child unless additional staffing were provided.

Publicly posting a program's ratio, as the proposed rule would require, provides information to families but does not substitute for a consistent quality standard. Families eligible for Head Start may also have limited access to other programs. NEA recommends retaining federal Head Start ratios and group-size protections and addressing enrollment constraints through adequate funding and workforce investment.

Maintain Strong Professional Standards for Early Childhood Educators

The quality of early childhood education depends heavily on the knowledge, preparation, and professional expertise of the educator.

NEA supports a highly qualified early childhood workforce and policies that recognize early childhood educators as professionals. Head Start's standards have helped establish an important national expectation that educating young children requires specialized knowledge of child development, developmentally appropriate practice, early literacy and mathematics, social-emotional development, disability inclusion, family engagement, and other competencies.

Recent national research documents substantial variation in state qualification requirements for early childhood educators. The Center for the Study of Child Care Employment's (CSCCE) 2024 *Early Childhood Workforce Index* reports that no state requires a bachelor's degree for lead teachers in non-pre-K center-based programs, while only Pennsylvania, Illinois, and the District of Columbia require an associate degree for lead teachers in those settings.¹² The report further finds substantial variation in the qualification requirements for center directors, teachers, and assistant teachers, with some states establishing no minimum qualification requirements at all. CSCCE also finds that qualification requirements vary not only across states but across program settings and funding streams and specifically notes that programs such as Head Start often have higher requirements than child care licensing.¹³

¹⁰ <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>.

¹¹ <https://cep.asu.edu/blog-cep/child-care-ratios-head-start-state-licensing>

¹² <https://cscce.berkeley.edu/workforce-index-2024/state-policies-to-improve-early-childhood-educator-jobs/early-childhood-educator-workforce-policies/qualifications-educational-supports/>

¹³ <https://cscce.berkeley.edu/workforce-index-2024/state-policies-to-improve-early-childhood-educator-jobs/early-childhood-educator-workforce-policies/qualifications-educational-supports/>

Pennsylvania illustrates the distinction between a state qualification requirement and a comprehensive federal program standard. CSCCE reports that Pennsylvania is one of only three jurisdictions that require an associate degree for lead teachers in non-pre-K center-based programs.¹⁴ This distinction demonstrates why even comparatively strong state licensing requirements are not interchangeable with the HSPPS. Licensing establishes the conditions under which a facility may legally operate; Head Start standards define the staffing and program conditions for delivering a comprehensive federal early childhood program.

NEA recommends retaining strong national qualifications and professional development standards. Workforce shortages must be addressed through competitive compensation, benefits, attainable career pathways, planning time, professional learning, and improved working conditions, not through reductions in professional expectations. The workforce implications must also be evaluated as part of the proposed rule's regulatory impact analysis. If HHS proceeds with the proposed rule and its projected savings depend in part on reductions in personnel expenditures, the Department must identify which staffing assumptions underlie those estimates and separately assess potential effects on educator workload, recruitment and retention, staff turnover, and continuity of care.

Preserve Services for Children with Disabilities

NEA supports inclusive educational opportunities and the early identification and support of children with disabilities. Head Start plays an important role in connecting families with screening, referral, early intervention, preschool special education, and local educational agencies.¹⁵

The current federal framework includes requirements that work together to support identification, service coordination, inclusion, and transitions. Recent research demonstrates that state child care licensing rules do not uniformly contain comparable requirements.¹⁶ The distinction between statutory and regulatory requirements is important here. The NPRM states that statutory obligations concerning services for children with disabilities would remain in effect.¹⁷ The concern is therefore not that the proposed rule would eliminate every federal disability obligation, but that removing complementary regulatory requirements could alter how those statutory obligations are implemented consistently across Head Start programs. The fact that a statutory obligation remains in effect does not necessarily mean that eliminating the regulatory provisions that implement that obligation will have no effect on program practice or consistency across jurisdictions.

¹⁴ <https://cscce.berkeley.edu/workforce-index-2024/state-policies-to-improve-early-childhood-educator-jobs/early-childhood-educator-workforce-policies/qualifications-educational-supports/>

¹⁵ <https://headstart.gov/policy/45-cfr-chap-xiii>; <https://headstart.gov/children-disabilities>

¹⁶ <https://cep.asu.edu/blog-cep/child-care-ratios-head-start-state-licensing>; <https://cscce.berkeley.edu/workforce-index-2024/state-policies-to-improve-early-childhood-educator-jobs/early-childhood-educator-workforce-policies/qualifications-educational-supports/>

¹⁷ <https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

Texas illustrates the distinction between state licensing requirements and the HSPPS. Its child care licensing requirements address the operation of licensed facilities, while the HSPPS separately establish federal requirements concerning disability-related screening, referral, service coordination, inclusion, and collaboration with agencies responsible for services under the Individuals with Disabilities Education Act.¹⁸

Reliance on licensing requirements could produce different levels of protection and support depending on where a child lives. It could also affect the kindergarten and elementary educators who receive children when developmental needs have not been identified or addressed early.

NEA recommends preserving clear federal standards for disability inclusion, screening, referral, individualized support, and coordination with early-intervention providers and local educational agencies.

Preserve Protections for Children Experiencing Homelessness

Head Start also plays a critical role in reaching children and families experiencing homelessness, who may face barriers to enrollment and participation that are not addressed adequately by ordinary program eligibility and enrollment procedures. Families experiencing homelessness may move frequently, lack stable access to records or communication, and experience living circumstances that are not readily identified through traditional enrollment processes.

The Head Start Act specifically directs the Secretary to establish policies and procedures to remove barriers to the enrollment and participation of children experiencing homelessness.^{19 20} Those statutory requirements include identifying and prioritizing children experiencing homelessness, allowing families to apply, enroll, and attend while required documentation is obtained, and coordinating with local educational agencies and their McKinney-Vento homeless education liaisons. The NPRM acknowledges that the underlying statutory obligations would remain in effect but removes or substantially reduces the regulatory provisions that currently implement them. Retaining the statutory obligation does not resolve the concern that removing the regulatory procedures implementing that obligation could make its application less consistent across Head Start programs and create additional barriers for families who already face significant obstacles to enrollment and participation.

This distinction is particularly important because statutory language alone does not necessarily provide programs with the operational procedures needed to implement these requirements consistently. The current HSPPS provide specific mechanisms for identifying and recruiting children

¹⁸ <https://cep.asu.edu/blog-cep/child-care-ratios-head-start-state-licensing>; <https://cscce.berkeley.edu/workforce-index-2024/state-policies-to-improve-early-childhood-educator-jobs/early-childhood-educator-workforce-policies/qualifications-educational-supports/>

¹⁹ 45 C.F.R. § 1302.12(i)–(j); § 1302.14(a)(1).

²⁰ <https://www.ed.gov/media/document/non-regulatory-guidance-education-homeless-children-and-youths-program-august-4-2026-114353.pdf>

experiencing homelessness, incorporating homelessness into selection criteria, and coordinating with local educational agency homeless liaisons. The proposed rule would remove these regulatory mechanisms.

The proposed changes also would eliminate the current regulatory pathway allowing programs to use a family's signed declaration or other flexible documentation to establish homelessness when conventional records are not available. The NPRM would instead provide that self-attestation does not satisfy eligibility requirements. For families who have lost documents, are temporarily staying with others, are living in motels or other unstable circumstances, or are moving between communities, additional documentation requirements could create barriers precisely when Head Start is intended to provide access and stability.²¹

The proposed rule would also remove current regulatory provisions supporting coordination between Head Start programs and local educational agency McKinney-Vento liaisons. That coordination is particularly important because school district homeless liaisons may have information about families experiencing homelessness who have school-age children and can help connect younger children in those families with Head Start and Early Head Start.

NEA recommends retaining clear federal policies and procedures implementing the Head Start Act's requirements concerning children experiencing homelessness, including identification, outreach and recruitment, prioritization, enrollment and attendance while documentation is obtained, coordination with McKinney-Vento liaisons, and continuity of services when families move.

Retain Family Engagement

Families are children's first teachers and essential partners in early education.²² Meaningful family engagement requires more than communication about program operations. Head Start's approach includes family participation in program governance, goal setting, educational planning, transition activities, and connections to comprehensive services.

The Head Start Act itself requires each Head Start agency to have a policy council and requires delegate agencies to establish policy committees. These statutory governance requirements provide an important foundation for parent participation in Head Start decision-making. Parent committees, by contrast, are established through regulation rather than expressly required by the Act. Eliminating the regulatory structure for parent committees could nevertheless reduce the mechanisms through which parents participate meaningfully in program activities and decision-making.

Arizona offers an example of the difference in regulatory purposes. State licensing requirements address parent access, notices, records, and communication necessary to operate a child care

²¹ <https://schoolhouseconnection.org/article/proposed-head-start-rule-eliminates-critical-protections-for-children-experiencing-homelessness>

²² <https://headstart.gov/school-readiness/article/parent-family-community-engagement-pfcee-framework>

facility.²³ Those requirements do not, by themselves, provide an equivalent to Head Start’s comprehensive structure for parent committees, policy councils, family partnership services, or sustained family participation in program decision-making.

The NPRM expressly describes increased parental authority as one of its purposes and proposes reducing federal requirements governing parent committees and family engagement procedures.²⁴ If HHS proceeds with the proposed regulation, the Department must explain how it will strengthen meaningful parent participation while preserving statutory governance and parent participation requirements established by the Head Start Act, including meaningful opportunities for families with limited English proficiency, families of children with disabilities, and families facing other barriers to participation to engage in shared decision making.

Preserve Appropriate Support for Multilingual Children and Families

Head Start serves children and families with diverse linguistic backgrounds.²⁵ Federal early childhood standards must recognize the role of children’s home languages in learning and development and must ensure that families can meaningfully participate in program activities and communicate with educators and service providers.

The proposed rule would impose new restrictions concerning the language of instruction. If HHS proceeds, the Department must explain how the proposed changes would affect children who are learning English, children whose home language is not English, and families who rely on languages other than English to participate fully in their children’s education and services.

NEA recommends retaining federal expectations that support developmentally appropriate instruction and meaningful communication with children and families who use languages other than English, while allowing programs appropriate flexibility to respond to the linguistic needs of their communities.

Retain Behavioral Supports and Limit Suspension and Expulsion of Young Children

NEA supports safe, just, and equitable learning environments. Educators need effective behavioral and mental health supports that help them respond to children’s needs without relying on exclusionary practices. The proposed rule would remove the federal process governing suspension and expulsion and permit programs to establish policies within applicable state and local requirements.²⁶

²³ <https://cep.asu.edu/blog-cep/child-care-ratios-head-start-state-licensing>

²⁴ <https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

²⁵ <https://headstart.gov/culture-language/article/visual-guide-dual-language-learners-head-start-programs>

²⁶ <https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

Removing the federal regulatory framework would place greater responsibility on programs and applicable state and local requirements to determine how suspension, expulsion, behavioral support, and related interventions are addressed. This is concerning because research indicates that harsh and exclusionary discipline in early childhood is associated with negative effects on children’s emotional and psychological well-being, learning, and longer-term educational trajectories.

CEP’s 2026 review found substantial disparities in the use of exclusionary discipline: Black children represented 18% of preschool enrollment but 38% of children suspended one or more times, while children served under IDEA represented 23% of enrollment but 74% of expulsions.²⁷ These findings underscore the importance of clear limitations on exclusionary discipline and of requiring developmentally appropriate, supportive responses to challenging behavior rather than relying on exclusion as a routine intervention. Moreover, CEP’s review found substantial variation in state protections: although all states and the District of Columbia have child care licensing provisions addressing behavior guidance and discipline, only 17 states specifically address suspension and expulsion in their child care licensing systems, and only 14 states have policies that align with Head Start protections regarding suspension, expulsion, and supportive processes.²⁸ If HHS proceeds, the Department must explain how the proposed changes would ensure consistent implementation of the Head Start Act’s statutory requirements across jurisdictions and prevent avoidable differences in protections for similarly situated children.

Retain Comprehensive Services and Program Improvement

Head Start’s value extends beyond classroom instruction. Health, nutrition, mental health, family, disability, and transition services help address barriers that can adversely impact children’s learning and development.

North Carolina demonstrates why a comprehensive federal framework remains important even in a state with a well-developed early childhood system. The state administers child care licensing, publicly funded prekindergarten, child care assistance, and other early learning initiatives through different programs and requirements.²⁹ State licensing provides an important health and safety foundation, but it does not independently guarantee that every licensed program will provide the coordinated education, health, nutrition, mental-health, disability, family-engagement, and continuous-improvement services required of Head Start.

²⁷ <https://cep.asu.edu/blog-cep/head-start-state-discipline-policies>; <https://cep.asu.edu/resources/harsh-punishment-exclusionary-discipline-early-years>

²⁸ <https://cep.asu.edu/blog-cep/head-start-state-discipline-policies>; <https://cep.asu.edu/resources/harsh-punishment-exclusionary-discipline-early-years>

²⁹ <https://cep.asu.edu/blog-cep/child-care-ratios-head-start-state-licensing>; <https://cscce.berkeley.edu/workforce-index-2024/state-policies-to-improve-early-childhood-educator-jobs/early-childhood-educator-workforce-policies/qualifications-educational-supports/>

NEA recommends retaining comprehensive services, continuous program improvement, data-informed decision-making, and coordination with public schools and community partners.

If HHS Proceeds, Require a State-by-State Impact Analysis Before Finalizing the Rule

Although NEA urges HHS to withdraw the NPRM in its entirety, if the Department proceeds with the proposal, the proposed shift toward state and local requirements warrants a detailed state-by-state analysis before HHS takes further action. The NPRM identifies increased state authority as a central feature of the proposed rule, including with respect to group size and staff-to-child ratios.

HHS must identify, for each state and relevant program type, how the proposed rule would change requirements concerning staff qualifications, staff-to-child ratios, group size, disability services, family engagement, behavioral supports, health and mental health services, professional development, and other substantive areas currently governed by the HSPPS. The analysis must identify both the federal standard being removed and the state or local requirement that would apply in its place.

Without this comparison, it is difficult to evaluate the NPRM's assertion that shifting authority to states would preserve statutory accountability while reducing unnecessary regulatory burden. A state-by-state comparison would allow HHS, Head Start programs, families, educators, and the public to identify where proposed changes would increase flexibility and where they could materially change program requirements.

The analysis must give particular attention to populations for whom mobility and administrative barriers are already significant, including children experiencing homelessness. For these children and families, differences in documentation, enrollment, transportation, service coordination, and continuity requirements can have consequences precisely because families may move between communities or service areas. If HHS proceeds with the proposed rule, the Department must assess not only whether state requirements differ from the HSPPS, but whether those differences create additional barriers to accessing or maintaining Head Start services.

Strong Head Start Standards Benefit Public Education

Head Start does not operate separately from public education. School districts administer Head Start programs in many communities, and children transition from Head Start into public school kindergarten classrooms. Public schools also play an important role in identifying and supporting children experiencing homelessness through McKinney-Vento homeless education liaisons. Maintaining strong coordination between those liaisons and Head Start programs helps ensure that younger children in families identified through the public education system can be connected to early childhood services.

NEA members see how children's early experiences influence their readiness to participate fully in school. Well-prepared early childhood educators, appropriate staffing levels, early identification of disabilities, family partnerships, and comprehensive services support successful transitions and allow receiving educators to build on children's prior learning.

Replacing federal requirements with varying state licensing standards could therefore affect not only Head Start programs but also the public schools, educators, and students connected to them.

Conclusion

Head Start represents a federal commitment to comprehensive early learning and development for children and families served by the program. State licensing systems serve an important but different regulatory function. The central issue presented by this NPRM is therefore not whether states and local programs must have flexibility, or whether genuinely duplicative administrative requirements must be eliminated. It is whether that flexibility can be achieved without replacing substantive federal program standards with requirements that vary materially by state.

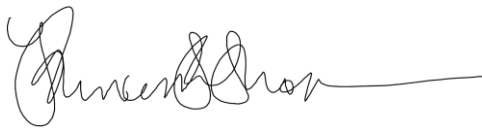
The proposed rule would affect the conditions under which children receive Head Start services, including staffing, educational practices, disability supports, family engagement, behavioral supports, and comprehensive services. The Children's Equity Project's analysis documents substantial differences between state licensing requirements and the HSPPS, including significant differences in teacher-to-child ratios. HHS must account for those differences and explain how the proposed rule would preserve the quality, scope, and consistency of services provided to children and families.

At stake is more than the structure of federal regulations. The proposed rule would determine whether children participating in Head Start encounter a consistent federal standard for the services and supports on which their learning and development depend. Children should not receive materially different protections or opportunities simply because their Head Start program operates in a different state.

For these reasons, NEA urges the Department to withdraw this proposed rule in its entirety.

We respectfully submit these comments for consideration. Please do not hesitate to contact me or Daaiyah Bilal-Threats, Senior Director of Policy, at DBilal@nea.org should you have any questions.

Sincerely,



Princess Moss
President
National Education Association