



October 8, 2026

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

The Honorable Alex J. Adams
Assistant Secretary
Administration for Children and Families
330 C Street, S.W.
Washington, DC 20201

Dear Secretary Kennedy and Assistant Secretary Adams,

For more than sixty years, the Head Start program has provided infants and toddlers in the Central Valley and across the country with the early childhood development and education they need to build a strong foundation for success. Head Start serves our most vulnerable children and families and has a proven track record of ensuring foster, disabled, and homeless youth receive the support they need to keep pace with their peers. The *Reducing Federal Burden for Head Start Programs Notice of Proposed Rulemaking* (NPRM) threatens to undermine these critical services and the continued success of Head Start programs in my district.

The proposed rulemaking would fundamentally reshape the nationwide Head Start program by eliminating performance standards that have been central to its success for decades. While the administration describes the proposal as an effort to modernize the program and provide greater flexibility to state and local leaders, it also creates significant uncertainty for the communities and families who rely on Head Start. Removing the performance standards would shift administrative burden onto already strained programs, requiring them to navigate a complex set of state and local statutes and regulations. Providers are concerned that removing clear performance standards could leave key requirements open to subjective interpretation, making it more difficult for programs to understand and meet federal expectations, potentially putting longstanding Head Start grants at risk.

In CA-22, Kings Community Action Organization (KCAO), Community Action Partnership of Kern (CAPK), Tulare County Office of Education, and Community Action Partnership of San Luis Obispo (CAPSLO) operate Head Start programs and work tirelessly to meet the unique needs of families across the Central Valley. I am deeply concerned that, if finalized as proposed, these programs could face greater challenges in retaining qualified teachers, ensuring Spanish-speaking children have access to the educational resources they need

to succeed, and maintaining the funding streams necessary to keep their doors open. Efforts to modernize Head Start cannot come at the expense of the children and families the program was created to serve.

The proposed rule would allow Head Start programs to increase classroom sizes, reduce service hours, and lower qualifications for program staff. Providers in my district have emphasized that federal performance standards are essential not only to ensuring compliance with federal law and grant requirements, but also to maintaining the comprehensive, high-quality services that families depend on. For example, the current teacher-to-child ratio of approximately 1 teacher for every 8 students is critical to providing individualized attention and high-quality instruction. By comparison, California's requirements for state-funded programs vary, but the typical ratio is approximately 1 teacher for every 12 students, with a maximum group size of 24 children. Without strong federal standards, many Head Start providers are concerned that classroom sizes could increase to align with state standards and help achieve the cost savings outlined in the proposed rule, which are projected to total \$2 billion annually.

In fact, the NPRM projects an approximately 32 percent increase in the average number of children per teacher and more than \$1 billion in potential cost savings from larger class sizes alone. These projections raise serious questions about what programs would have to sacrifice to achieve those savings. Reducing the number of teachers and staff would place additional burdens on an already critical workforce and make it more difficult for educators to provide the individualized attention and comprehensive services Head Start children need. We should not pursue cost savings by reducing the workforce that makes high-quality Head Start programs possible.

Head Start providers in my district also serve a significant Hispanic population, with an estimated 70 percent of students speaking two languages. Migrant and Seasonal Head Start programs serve families across the Central Valley, supporting the children of migrant and seasonal agricultural workers and addressing the unique challenges these families face. Providers have emphasized the importance of being able to communicate with children and families in their native language while supporting dual language development and English acquisition. Yet the proposed rule would establish an English-only requirement for instructional time. Providers have told me this requirement fails to recognize the realities of caring for children ages 0 to 5, when learning and development happen throughout the day—not on a fixed instructional schedule. Teachers need the flexibility to communicate with children in their native language while providing care, guidance, and instruction. Most importantly, providers have pointed to extensive research showing that restricting native-language instruction for dual language learners can undermine, rather than strengthen, English acquisition.

Head Start programs are already struggling to keep pace with rising costs, from teacher salaries and learning materials to essential administrative functions such as information technology and human resources. Current federal standards allow up to 15 percent of total program costs for program development and administration, with many programs operating just below that limit. The proposed rule would reduce that cap to 5 percent, significantly limiting the resources available for programs to manage their day-to-day operations. The proposal points to other HHS grant programs, including the Community Mental Health Services Block Grant

(MHBG) and the Child Care and Development Fund (CCDF), which are subject to a 5 percent administrative cap. However, these programs operate under different structures and rely more heavily on state and local entities to administer and oversee their programs, resulting in lower administrative costs. Head Start programs in the Central Valley face a very different reality. Providers in my region have said that a 5 percent cap would leave them without the resources necessary to maintain essential operations and would threaten their ability to continue serving our most vulnerable children and families.

The proposed rule does provide a waiver process for programs seeking exemptions from certain requirements, including the English-only provision and the administrative cost cap. However, without clear timelines for reviewing and deciding waiver requests, this process could leave programs in limbo and make it difficult for providers to plan and make critical program decisions. This lack of clarity is particularly concerning given the delays Head Start providers across the state have experienced over the past year. Providers have reported that paperwork and payments that once took approximately 30 to 60 days are in some cases now taking nine months or longer to process. The final rule must provide clear deadlines for the agency to approve or deny waiver requests, as well as a defined process for programs to appeal a denial. Head Start providers should not be forced to operate with uncertainty while waiting an unspecified amount of time for the federal government to make decisions that directly affect their ability to keep their doors open.

Modernizing the Head Start program to prioritize local decision-making, increase program flexibility, and strengthen outcomes for children and parents is a goal shared by all the programs in my district. During my time in Congress, I have had the opportunity to visit several Head Start classrooms and see firsthand how these programs invest in the success of Central Valley children and families. The work these providers do is challenging, but their unwavering dedication to serving our communities is why I believe so strongly in the program.

I urge the Department of Health and Human Services to give full and fair consideration to the comments submitted by Head Start providers in my district. Any final rule must preserve the Head Start Performance Standards that have helped ensure high-quality services and positive outcomes for Central Valley children and families.

Sincerely,



David G. Valadao
Member of Congress