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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
U.S. Department of Health and Human Services
330 C. Street, S.W.
Washington, DC 20201

September 28, 2026

Dear Secretary Kennedy and Assistant Secretary Adams:

I write to leave a public comment on the Administration for Children and Families' Proposed Rule titled, "Reducing Federal Burden for Head Start Program, Inc." I strongly urge you to revise several provisions in the proposed rule to ensure the sustainability, financial security, and success of Head Start programs nationwide.

In my home district, Head Start of Rockland, Inc. represents the best of early childhood education. Over the last 62 years, this program has provided high-quality services to tens of thousands of children across the county. Head Start of Rockland has truly made a difference in my community, providing necessary development, health, nutrition, and language services, among many more, that many families wouldn't receive otherwise. I have my tenure in Congress advocating for enhanced funding to this specific program so that even more families can reap the benefits. Because I believe in Head Start, and I've seen the impact in Rockland.

It is with this background that I raise serious concern about the recent Proposed Rule and urge you to make needed adjustments in any final rule.

First, I urge you to reconsider the provision that requires Head Start programs to provide all education in English. Existing requirements specifically allow programs to support bilingualism, especially for children with non-English home languages. The U.S. is a melting pot, and many of our young constituents that utilize Head Start only know the language their parents speak at home. While I understand that it is an Administration priority to teach more kids English in order to bolster their economic opportunities and community engagement, we must take into account their diverse backgrounds and that many children learn more effectively through native-language instruction alongside English acquisition.

According to U.S. Census data, 44.2% of households in Rockland County speak a language other than English at home. As such, forcing Head Start programs to only teach in English would have a disproportionate negative impact in Rockland and similarly diverse communities in New York. I urge you to remove this requirement from the Proposed Rule or adjust the language to offer English-only instruction as an option for families in communities where it makes sense.

I am also deeply concerned that the Proposed Rule would lower the cap on administrative expenses from 15 percent to 5 percent. Many of these administrative costs are not flexible, and programs need to keep the lights on in order to serve children and families. In fact, the current 15 percent cap is already low, and many programs have had to make significant administrative cuts and combine roles just to maintain much needed ongoing monitoring and oversight. Dramatically lowering the administrative cost cap would only shift costs from the federal government to the program itself, likely compromising the services programs are able to provide. I urge you to keep the cap at 15 percent or even consider increasing it, rather than reducing it further. If any reduction moves forward, I urge you to include a phase-in mechanism. The costs many organizations pay now cannot adjust overnight, and measures to adjust bottom lines can take time to implement as well.

Additionally, I am concerned about how the Proposed Rule adjusts the Head Start Program Performance Standards. There is a reason that Head Start is one of the most successful government programs - quality. While I understand the intent behind this rule is to improve program flexibility, local and state oversight often varies by state, and they often not meet current high-quality standards that Head Start offers. It is essential that the standards guarantee certain critical services for all children and families, regardless of what state they reside. This includes hearing and vision screenings, dental care and oral hygiene, and mental health support. Although programs would still be allowed to provide such services under the Proposed Rule, a requirement ensures that even in low-income communities, children's health and wellbeing are prioritized.

Similarly, I am concerned that the Proposed Rule removes specific training requirements for Head Start staff. Existing training components ensure that educators are properly oriented to their programs and undergo specialized training to help children. While I understand programs are allowed to maintain existing requirements if they so choose, uniform requirements ensure that program quality is not compromised in states with lower standards. I recommend including a list of best practices even if not mandated and encouraging a list of preferred training even if not hyper-specified.

I am also concerned with the proposal to adjust staff-to-child ratios in Head Start classrooms. Appropriate ratios are not simply measures of educational quality; they are fundamental to active supervision and young children's health and safety. Increasing the number of children assigned to each teacher can make it more difficult to continuously supervise children, particularly during transitions, outdoor play, meals, toileting, arrival, dismissal, and transportation.

It is my understanding that programs may continue to offer smaller ratios as long as they are consistent with state regulations. While I appreciate regulatory flexibility and recognize the fiscal

and workforce challenges facing programs, a child's level of protection should not depend on the state in which that child lives. I urge HHS and ACF to maintain the existing federal staff-to-child ratios as a national safety floor while encouraging states and programs to adopt higher safety standards at the state level.

The Proposed Rule also removes regulations governing “parent committees.” While Head Start policy councils and governing boards both are partially made up of parents in the community, parent committees were the only body fully made up of parents. I understand that individual Head Start awardees can still utilize parent committees even with this change, but I am concerned that eliminating the regulatory framework entirely could reduce family participation. U.S. code requires programs to work with parents on a variety of measures, including as it relates to their families’ financial stability as well as the care and education of their child. I view parent committees as an important vehicle for this communication and urge you to re-add the regulatory structure for parent committees to this Proposed Rule, potentially with less descriptive language to ensure flexibility for parent committees to meet the needs of their individual communities.

I am deeply concerned that the Proposed Rule, as currently written, would weaken the Head Start program as a whole and result in the reduction of quality services offered to low-income children and families in New York and across the country. We can reduce unnecessary bureaucracy and be responsible stewards of federal dollars without compromising sound care for children. Health and safety should not be where we seek savings or efficiencies. Making America stronger begins with protecting and investing in the next generation of children.

I urge you to take my suggestions into account. Head Start is one of the federal government’s most creative, substantial, and successful programs to date. I am committed to strengthening the program in Congress and hope that you work with me to protect that objective moving forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lawler", with a stylized flourish at the end.

Michael V. Lawler
Member of Congress