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NPRM Public Comment Toolkit

This toolkit is informational and intended to help Head Start supporters submit public comments on the proposed changes to the Head Start Program Performance Standards. Comments do not need to be long or technical. The most effective comments are clear, personal, and specific about why Head Start standards matter.

Head Start and Early Head Start at South Shore Community Action Council (SSCAC)

SSCAC has operated a Head Start program since its founding in 1965. Under the umbrella of its South Shore Early Education program, SSCAC provides Head Start and Early Head Start for hundreds of infants, toddlers, and preschoolers annually at 3 of its 5 early education centers. The program targets the most financially vulnerable families at or below 130% of the Federal Poverty Level (FPL). The whole-child, whole-family approach that serves as the foundation for SSCAC's Head Start and Early Head Start translates into comprehensive wrap-around services for children and their families, including daily meals and snacks, school bus transportation, onsite nurses, mental health and disabilities screening and support, and parent engagement, education, and leadership opportunities.

How to Submit a Comment

1. Go to <https://www.regulations.gov/commenton/ACF-2026-0595-0001> and either type your comment (5,000 character limit) or upload a file with your comment; OR
2. Go to www.regulations.gov and search for docket number ACF-2026-0595 or RIN 0970-AD30, select the proposed rule related to the Head Start Program Performance Standards, click the button to submit a comment; OR
3. Email: Deregulation@acf.hhs.gov. Include the docket number ACF-2026-0595 and/or RIN number 0970-AD30 in the subject line of the message.
4. Copy and personalize one of the sample comments below, or write your own comment using the Concern, Impact, and Request format.
5. **Submit your comment before the deadline on October 6, 2026.**

Quick Reminders

- Use your own words whenever possible.
- Identify yourself by role, such as parent, grandparent, board member, staff member, Policy Council member, community partner, or local supporter.
- Explain why Head Start matters to you, your family, your organization, or your community.
- Be respectful, clear, and specific.
- Mention docket number ACF-2026-0595 and/or RIN 0970-AD30 if you can.
- Ask ACF not to finalize changes that would weaken Head Start standards.
- All comments received are a part of the public record and will be posted for public viewing on www.regulations.gov, without change. The substance of the comments and the identity of individuals or entities submitting the comments will be subject to public disclosure.

Use This Simple Comment Structure

- **Concern:** Describe the proposed change you are worried about.
- **Impact:** Explain how it would affect children, families, staff, programs, or the community.
- **Request:** Clearly ask ACF to preserve strong Head Start standards.

Choose Your Role: Sample Comment Language

Parent or Family Member

I am a parent/family member who values Head Start and Early Head Start. **Concern**¹: I am concerned that the proposed rule would weaken standards for education, health, safety, disability services, family engagement, eligibility, and parent voice. **Impact**: Families rely on Head Start for safe classrooms, caring teachers, developmental supports, health and nutrition services, and help during important transitions. **Request**: Please preserve strong Head Start standards that protect children, support families, and keep parents involved in decisions that affect their children.

Board Member

I am a board member who supports Head Start's mission and the responsible stewardship of public funds. **Concern**: I am concerned that the proposed rule would weaken

¹ When submitting comment, if you are copying/pasting from these sample comments, be sure to remove the bold-typed comment structure guides (i.e., "**Concern**:", "**Impact**:", "**Request**:").

governance, administrative capacity, standards for staff and safety, monitoring, and accountability. **Impact:** Boards need clear federal standards and adequate administrative resources to oversee grants, protect children, support staff, manage risk, and ensure high-quality services. **Request:** Please do not finalize changes that reduce administrative capacity, weaken parent governance, or remove objective accountability standards.

Staff Member

I am a Head Start staff member/supporter. **Concern:** I am concerned that the proposed rule would weaken standards for education, health and mental health, safety, staff qualifications, professional development, disability inclusion, and discipline practices. **Impact:** Staff need clear expectations, reasonable classroom structures, strong safety systems, and adequate supports to meet children's needs and partner with families. **Request:** Please preserve the standards that support safe, high-quality services and a skilled, stable, culturally responsive Head Start workforce.

Community Stakeholder

I am a community stakeholder who supports Head Start because it strengthens children, families, schools, employers, and communities. **Concern:** I am concerned that the proposed rule would weaken standards for school readiness, health, nutrition, mental health, safety, transportation, family engagement, eligibility, administrative capacity, and accountability. **Impact:** Head Start is part of the community infrastructure that helps children enter school ready to learn and helps families build stability. **Request:** Please preserve strong federal Head Start standards and ensure that any changes strengthen access, quality, safety, and accountability.

Current or Former Policy Council Member

I am a current/former Head Start Policy Council member. **Concern:** I am concerned that the proposed rule would weaken Parent Committee and Policy Council requirements and reduce parent voice in Head Start governance. **Impact:** Policy Council empowers parents to help shape decisions about program quality, services, hiring, budgets, enrollment, and family engagement. Weakening shared governance would reduce transparency, accountability, and family leadership. **Request:** Please preserve strong federal requirements for Policy Council, Parent Committees, parent leadership, and shared governance, along with the comprehensive standards that protect Head Start children and families.

Optional Closing Sentence

For these reasons, I respectfully urge ACF not to finalize the proposed rule as written and to preserve the standards that make Head Start a trusted, comprehensive, high-quality program for children and families.

Sample Public Comments by Potential Impact Area

The following are sample comments that delve more deeply into potential impact areas. Each submitter is encouraged to personalize comments with their own experience and focus on the areas of greatest concern.

Opening Comment Template

I am submitting this comment in strong support of Head Start and Early Head Start. Head Start is more than a preschool program. It is a proven, comprehensive early childhood program that supports children's learning, health, nutrition, safety, family stability, and school readiness. I urge the Administration for Children and Families not to finalize proposed changes that would reduce federal standards, eliminate core protections, or shift responsibility to states and local programs without providing additional resources. Deregulation should never come at the expense of child safety, quality, equity, or family access.

Education and Learning Environment

Concern: I am concerned that the proposed rule would weaken Head Start classroom quality by removing federal standards for class size, child-staff ratios, duration, curriculum, screening, assessment, and multilingual learning supports. **Impact:** Young children learn best in small, well-supported classrooms with qualified educators who can individualize instruction, build relationships, and respond to developmental needs. Families also benefit when programs respect children's home languages and cultures. **Request:** I urge ACF to maintain strong federal standards for classroom quality, developmentally appropriate instruction, multilingual supports, screening, assessment, group size, ratios, and duration.

Health and Nutrition

Concern: I support requirements that promote nutritious foods, breastfeeding where applicable, and physical activity, but I strongly oppose removing federal requirements that protect children's health, mental health, and safety. **Impact:** Head Start's comprehensive health model helps families access screenings, dental care, mental health consultation, health insurance, and follow-up services that are often difficult for low-income families to

secure on their own. Removing clear prohibitions on abuse, neglect, humiliation, shaming, and corporal punishment would weaken essential protections. **Request:** I urge ACF to retain federal health, mental health, dental, nutrition, safety, and child protection standards as essential parts of Head Start.

Safety and Transportation

Concern: I oppose eliminating federal transportation safety requirements, bus monitor requirements, child restraint expectations, facility safety standards, hygiene practices, emergency preparedness, and staff safety training. **Impact:** Families trust Head Start to keep children safe from the moment they are picked up until the moment they return home. State rules vary, and children should not receive different levels of protection depending on where they live. **Request:** I urge ACF to maintain strong national safety and transportation standards for all Head Start and Early Head Start programs.

Services for Children with Disabilities

Concern: I am concerned that the proposed rule would remove important federal requirements for serving children with disabilities. **Impact:** Head Start plays a critical role in identifying developmental concerns early, supporting families through evaluation, and ensuring children receive individualized services while IDEA eligibility is being determined. Removing these requirements could delay services and increase inequities. **Request:** I urge ACF to preserve strong federal standards for early identification, inclusion, individualized support, family partnership, and coordination with early intervention and special education systems.

Family Engagement and Program Transitions

Concern: I oppose removing requirements that support family engagement, state quality participation, and transition services. **Impact:** Head Start succeeds because it partners with parents and caregivers as children's first teachers and helps families prepare for transitions into kindergarten and other settings. Transition planning helps children, families, and schools share information, reduce stress, and support school readiness. **Request:** I urge ACF to keep requirements that ensure meaningful family partnership, participation in state quality systems where applicable, and strong transition supports for children and families.

Services for Pregnant Women

Concern: I am concerned that the proposed rule would remove requirements that help pregnant women access health care, insurance, and services that reduce barriers to healthy maternal and birthing outcomes. **Impact:** Early Head Start services for pregnant women are an important investment in healthy pregnancies, healthy births, and strong

infant development, especially for families facing poverty, housing instability, transportation challenges, and limited access to care. **Request:** I urge ACF to maintain requirements that ensure pregnant women receive coordinated, documented, and meaningful support through Early Head Start.

Management Systems and Administrative Costs

Concern: I strongly oppose reducing the allowable administrative cost cap from 15% to 5% and removing staff qualification, professional development, culturally appropriate staffing, and staff wellness requirements. **Impact:** Head Start programs need adequate administrative capacity to comply with requirements, maintain safe facilities, hire and support staff, manage grants, protect family data, conduct fiscal oversight, ensure transportation and safety systems, and meet the needs of children and families. Cutting administrative capacity does not eliminate the work; it makes programs less stable and less able to operate responsibly. **Request:** I urge ACF to retain the 15% administrative cap and preserve standards that support a skilled, stable, culturally responsive, and healthy workforce.

Eligibility, Recruitment, Selection, Enrollment, and Attendance

Concern: I am concerned that the proposed changes would make it harder for the most vulnerable children to access Head Start and would allow local discipline policies that include suspension and expulsion of young children. **Impact:** Children experiencing homelessness, children in foster care, children with disabilities, and highly mobile families may not have immediate access to documentation. Self-attestation, flexible documentation, and slot reservations are practical tools that help programs reach families in crisis. Young children also need supportive responses, not exclusion from services. **Request:** I urge ACF to preserve eligibility flexibilities, slot reservations for highly vulnerable children, protections for children with disabilities, and federal safeguards that promote attendance, engagement, and supportive responses instead of exclusionary discipline.

Governance

Concern: I am concerned that weakening Parent Committees and Policy Council requirements would reduce parent voice and shared governance in Head Start. **Impact:** Parent Committees and Policy Councils are central to Head Start's identity and success because parents bring lived experience, community knowledge, and direct insight into what children and families need. Weakening parent governance would reduce accountability and diminish one of Head Start's greatest strengths. **Request:** I urge ACF to maintain strong federal requirements for parent participation, Policy Council engagement, and meaningful shared decision-making.

Facilities

Concern: I support efforts to make facilities processes more efficient, but only when they reduce unnecessary paperwork without weakening oversight. **Impact:** Head Start facilities are community assets, and programs need clear, practical, and timely processes to maintain safe, appropriate learning environments. Any simplification should preserve transparency, accountability, fiscal responsibility, and child safety. **Request:** I urge ACF to streamline facilities requirements only in ways that help programs improve access while maintaining strong protections for children, families, and public funds.

Closing Comment Template

For these reasons, I respectfully urge ACF not to finalize the proposed rule as written. Head Start's comprehensive standards exist because young children and families need consistent protections, high-quality early learning, health and mental health supports, nutrition services, family partnership, disability inclusion, and strong governance. Please preserve the standards that make Head Start effective and ensure that any changes strengthen, rather than weaken, services for children and families.