



**STATE OF NORTH CAROLINA
OFFICE OF THE GOVERNOR**

**JOSH STEIN
GOVERNOR**

October 5, 2026

Robert F. Kennedy., Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Alex J. Adams, Assistant Secretary
U.S. Department of Health and Human Services
Administration for Children and Families
200 Independence Avenue, S.W.
Washington, DC 20201

Re: Comments on Reducing Federal Burden for Head Start Programs (ACF-2026-0595, RIN 0970-AD30)

Dear Secretary Kennedy and Assistant Secretary Adams:

As Governor of North Carolina, I share the goal of ensuring that Head Start programs can serve more children and families while operating effectively. I appreciate efforts to reduce unnecessary administrative burden and provide local programs with appropriate flexibility. At the same time, I am concerned that the proposed rule published on August 7, 2026, would remove or substantially weaken safeguards that are central to Head Start's quality, accountability, and comprehensive-service model.

I urge the U.S. Department of Health and Human Services ("the Department") to consider the recommendations described below, retain the standards necessary to protect children and families, and work directly with governors, state agencies, Tribal nations, Head Start programs, early childhood educators, and families before issuing a final rule. Flexibility should help programs respond to local conditions; it should not result in larger classes, fewer qualified staff, shorter program days, diminished health and family supports, or widely different levels of service based solely on where a child lives.

Retain federal staff-to-child ratios and group-size caps. The proposed rule eliminates the staff-to-child ratios and group-size caps that have made Head Start successful. Small classes and sufficient staffing allow teachers to see, hear, and respond to each child. Individualized attention is especially important for the types of children Head Start serves: infants and toddlers, children from low-income families, children with disabilities or developmental delays, and dual-language learners. Because state licensing requirements vary, replacing uniform Head Start standards with state minimums would eliminate a consistent national floor. In states with less stringent requirements, programs could be permitted to operate with larger group sizes or higher child-to-staff ratios than current Head Start standards allow. The Head Start Act defines a Head Start classroom as a "group of children supervised and taught by two paid staff members" and directs the Secretary to establish scientifically-based and developmentally-appropriate performance standards without reducing the quality or scope of required

services. 42 U.S.C. §§ 9832(8), 9836a(a). I ask the Department to retain federal staffing requirements and maximum group sizes, while continuing to require compliance with more stringent state or local standards.

Protect Head Start's comprehensive services. Head Start has a long history of improving outcomes for children from low-income families because it combines early learning with health, oral health, nutrition, mental health, disability, and family-support services. By reducing detailed requirements in these areas, as well as in background checks, emergency preparedness, transportation safety, facilities, hygiene, family service caseloads, and disability coordination, the proposed rule erodes the very model that distinguishes Head Start as an evidence-based intervention. The Department should retain clear federal expectations for these core services and ensure that any simplification preserves their quality, scope, and availability.

Support a stable and qualified workforce. The proposed rule also undermines Head Start's ability to recruit and retain a qualified workforce. Head Start programs across our state face persistent challenges recruiting and retaining teachers, family service professionals, health staff, and program leaders. Removing requirements related to salary structures, pay parity, benefits, professional qualifications, and coordinated coaching would worsen staff turnover, reduce instructional quality, and limit enrollment capacity. I support targeted flexibility that helps programs fill vacancies, but the Department should pair that flexibility with investments and standards that sustain a qualified workforce and consistent quality.

Protect adequate program duration and accountability. By removing current requirements for the hours and days of Head Start Preschool operation, the proposed rule allows Head Start programs to return to schedules as short as three hours per day over 32 weeks. Shorter schedules may shift costs to working families, force parents to arrange additional care, or cause them to miss work to care for their child. Reducing requirements for attendance follow-up and community assessments could weaken programs' ability to identify and respond to emerging needs. Timely attendance follow-up helps programs recognize barriers such as transportation problems, housing instability, illness, or family crises before children become chronically absent or disengaged. Regular community assessments ensure that program design—including enrollment priorities, service locations, schedules, and family supports—continues to reflect changing local demographics and needs. Without these requirements, programs may have less information to guide improvement and fewer safeguards to ensure that services remain accessible and responsive to families. I ask the Department to retain duration standards that meet children's developmental needs and families' work realities, together with accountability measures that ensure Head Start programs are delivering for children and families.

Preserve a workable administrative-cost standard. The proposed rule would reduce the administrative-cost limit for Head Start programs from 15 percent to 5 percent of total approved program costs. At the outset, the proposed rule conflicts with the Head Start Act, which establishes a 15 percent ceiling and permits the Secretary to impose lower limits only based on an individualized determination that a particular program's costs are "excessive." 42 U.S.C. § 9839(b).

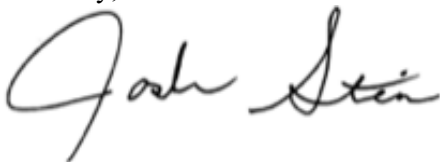
Looking past the Department's lack of authority to reduce the administrative-cost cap, the proposed rule would hamstring Head Start programs. The Federal data cited in the proposed rule indicate that only a small share of Head Start grantees currently operate at or below 5 percent, while the national average is substantially higher. A uniform 5 percent cap would force programs, for example, to choose between adequate staffing and improvements such as renovating space, expanding hours, and investing in technology, because both draw from the same limited funding. Moreover, this change would hold Head Start to a different standard than other federal grantees, in which the Office of Management and Budget operates a government-wide rule allowing nonprofits to claim 15 percent for administrative costs. I urge the Department to retain the current 15 percent standard and address excessive administrative costs on a case-by-case basis.

Maintain meaningful language access and family engagement. The proposed rule's English-language instruction mandate, absent a federal waiver, could undermine developmentally appropriate practices for children who are learning English and limit families' ability to participate fully in their children's education. It may also discourage programs from incorporating children's home languages—an important asset for learning, family engagement, and healthy identity development. Programs need the flexibility to use research-informed approaches that support both English language acquisition and children's home languages. Suppressing a child's home language is more likely to slow English acquisition than to speed it up. The Department should also preserve meaningful expectations for parent committees, family engagement, transitions, and home-based services.

I recognize that Head Start programs need relief from duplicative processes and inflexible rules. I support targeted efforts to eliminate provisions that merely duplicate requirements already clearly established in the Head Start Act. For example, requirements concerning the prohibition on charging fees and the conversion of Head Start slots to Early Head Start slots could be streamlined or incorporated by reference without weakening the underlying statutory protections. These targeted changes would reduce unnecessary repetition while preserving standards essential to program quality, accountability, and children's well-being. I stand ready to help HHS identify requirements that can be streamlined without sacrificing program quality, child safety, workforce stability, or access to comprehensive services. Before finalizing this proposal, I respectfully request that HHS conduct a transparent assessment of its effects on program capacity, staffing, family costs, service quality, and state systems, and provide a meaningful opportunity for state and local partners to shape any revisions.

Head Start has earned bipartisan support for generations because it pairs local leadership with a strong federal commitment to children and families. I urge HHS to preserve that balance and withdraw or substantially revise the provisions outlined above.

Sincerely,

A handwritten signature in dark ink, appearing to read "Josh Stein". The signature is fluid and cursive, with the first name "Josh" and last name "Stein" clearly distinguishable.

Josh Stein
Governor