September 2, 2026

Deputy Chief of Staff Adam N. Jones
Immediate Office of the Assistant Secretary
Administration for Children and Families, Department of Health and Human Services
330 C Street, SW
Washington, DC 20201

RE: Docket ACF-2026-0595

Dear Deputy Chief of Staff Jones,

This comment addresses "Reducing Federal Burden for Head Start Programs," Docket number ACF-2026-0595. Head Start was created to meet the "emotional, social, health, nutritional and psychological needs" of children from low-income families, but federal longitudinal evidence has found that the program "had little to no positive effects" for participating children. The same evidence found "little to no impact on cognitive, social-emotional, health, or parenting practices of participants" and, on some measures, harmful effects on children. These findings show that Head Start has not achieved its central goal of improving preschool opportunities for children from low-income families.

Additionally, the U.S. Department of Health and Human Services' Office of Inspector General and the Government Accountability Office have released disturbing reports of abuse, neglect, and safety lapses at Head Start centers around the country.[1]

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[1] U.S. Department of Health and Human Services, Office of Inspector General, "Review of 24 Head Start Grantees' Compliance with Health and Safety Requirements," December 13, 2011, https://oig.hhs.gov/reports/all/2011/review-of-24-head-start-grantees-compliance-with-health-and-safetyrequirements/; Jonathan Butcher and Jude Schwalbach, "Head Start's Contagion of Fraud and Abuse," Heritage Foundation Backgrounder No. 3467, February 28, 2020, https://www.heritage.org/education/report/head-starts-contagion-fraud-and-abuse; Madison Doan, "Over 1,000 Safety Violations Mar Head Start. Children Deserve Better," The Daily Signal, November 9, 2022, https://www.dailysignal. com/2022/11/09/over-1000-safety-violations-mar-head-start-children-deserve-better; Madison Doan, "When Head Start Fails Our Children: A Wake-Up Call for Reform," The Daily Signal, January 27, 2025, https://www.dailysignal. com/2025/01/27/when-head-start-fails-our-children-wake-up-call-reform/; U.S. Government Accountability Office, "Head Start: Action Needed to Reduce Potential Risks to Children and Federal Funds in Programs Under Interim Management," GAO-25-106954, December 2024, https://www.gao.gov/assets/gao-25-106954.pdf.

For these reasons, Head Start should be sunset. As federal officials prepare to end the program, policymakers should give parents the option to use their child's portion of Head Start spending at a public or private preschool provider of their choice.

This NPRM, however, proposes sound policy for current Head Start operations until lawmakers end the program. Research finds that when the Head Start system is compared to state preschool systems, Head Start is the second-most heavily regulated preschool system in the country. Only Vermont preschool regulations are more restrictive.[2] Under the proposed rules, state officials would have authority over "group size and ratios, background checks, and transportation practices while eliminating duplicative Federal requirements." As the NPRM states, this is an example of "cooperative federalism" and consistent with conservative education policy that entrusts decision making to state, local, and school personnel instead of federal agency staff.

Notably, the GAO estimates that the additional regulations approved under President Joe Biden's administration will require $2.3 billion in new taxpayer spending and result in fewer Head Start slots.[3] This new proposal reduces administrative rules and would allow officials to use taxpayer spending on additional Head Start and Early Head Start slots.

ACF should now take measurable steps to sunset Head Start. First, President Donald Trump's administration should zero-out the program's budget in the administration's next budget proposal. The administration should demonstrate leadership by proposing to end this ineffective, sometimes even unsafe, program for young children.

Second, the proposed language in § 1301.06(b) regarding educational materials and instruction that demonstrate the value of a healthy marriage should be expanded. Family members and parents should receive information about the success sequence, along with resources describing its effectiveness in helping individuals and couples avoid poverty.

The success sequence refers to a series of steps associated with a greater likelihood of avoiding poverty during prime working-age adulthood (ages 28 to 34).[4] These steps are: (1) graduating from high school, (2) entering the workforce or completing a postsecondary credential, and (3) marrying before having children. Research dating back at least to 2009 has

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[2] Anna Claire Flowers et al., "2026 State Childcare Regulations Index," Archbridge Institute, January 2026, https://www.archbridgeinstitute.org/wpcontent/uploads/2026/02/2026-State-Childcare-Regulations-Index.pdf (accessed June 11, 2026). Single Head Start sessions "are one group of 3- to 5-year-old children receiving care per day. Double sessions are two groups of 3- to 5-year-old children receiving care from the same staff on the same day."

[3] U.S. Government Accountability Office, "Head Start: Action Needed to Reduce Potential Risks to Children and Federal Funds in Programs Under Interim Management," GAO-25-106954, December 2024, https://www.gao.gov/assets/gao-25-106954.pdf.

[4] Wendy Wang and Brad Wilcox, "The Millennial Success Sequence: Marriage, Kids and the 'Success Sequence' Among Young Adults," Institute for Family Studies, September 2017, https://ifstudies.org/report-brief/the-millennial-success-sequence-marriage-kids-and-the-success-sequence-among-young-adults.

found that individuals who follow these steps are significantly more likely to avoid poverty than those who do not.[5] Given the substantial body of research supporting the success sequence, educational materials about healthy marriage should include information on its principles and documented outcomes.

More recent research has found that 97 percent of Millennials who follow the success sequence were not poor when they reached ages 28-34.[6] In fact, 86 percent of Millennials "who either followed all three steps, or are 'on track' to do so, are in the middle or top income groups in their prime adult years ages 28-34)." Policymakers should add instruction and research on the success sequence to the new rule.

Sincerely,

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Will Skillman Senior Research Fellow in Education

Madison Marino Doan
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[5] Ron Haskins and Isabel V. Sawhill, *Creating an Opportunity Society* (Washington, DC: Brookings Institution, 2009).
[6] Wang and Wilcox, "The Millennial Success Sequence."