



October 5, 2026

Robert F. Kennedy, Jr.
Secretary, Department of Health and Human Services

Re: ACF-2026-0595-0002, Reducing Federal Burden for Head Start Programs

Dear Secretary Kennedy,

Head Start California (HSC) appreciates the opportunity to comment on the Administration for Children and Families' (ACF) notice of proposed rulemaking to rescind and replace the Head Start Program Performance Standards, 45 CFR Part 1301, 1302, 1303, 1304, and 1305 (ACF-2026-0595-0002; RIN 0970-AD30). Head Start California is a nonprofit membership association that represents Head Start grant recipients throughout the State of California. Our organization supports 136 Head Start providers who collectively serve more than 70,000 children and their families across the state. These providers employ over 28,000 individuals and receive nearly \$1.6 billion in Federal Head Start grant funding annually. We offer our comments based on discussions with Head Start programs throughout California.

Although the Notice of Proposed Rulemaking (NPRM) suggests that the proposal will increase flexibility, align with state childcare licensing, and lower per-child costs, our membership of local, community-based Head Start agencies believe that the proposed changes would instead fundamentally alter the Head Start model, undermining quality, weakening outcomes, increasing administrative burden, and reducing the number of children and families served. While Head Start staff are often the first to raise that the current standards are overly prescriptive, the approach taken by the NPRM is akin to using a sledgehammer where a scalpel would be more appropriate.

We respectfully urge you to withdraw the current proposal and develop a replacement that:

- Builds upon feedback from the Head Start community to right-size the Head Start performance standards.
- Offers clear, consistent guidance and performance expectations for all Head Start programs nationwide, including compliance with the Head Start statute.
- Retains high-quality standards related to: group sizes; teacher-to-student ratios; intensity and duration of services; staff qualifications; and other evidence-based program design elements that are driven by research on outcomes and effectiveness for at-risk young children and families.

We would welcome the opportunity to engage with the Office of Head Start in developing a revised proposal that responds to these recommendations.

Summary of Concerns

The text of the NPRM, evaluated through the lens of our members' experience operating Head Start programs in rural and urban communities across our state, leads us to the following overarching concerns regarding the likely outcomes for children, families and staff if the

proposal were to be finalized as written:

- Reduced quality, services, and ROI. The proposal would allow larger class sizes (on average 16% larger, according to the NPRM), fewer teachers (NPRM predicts cutbacks of 13-24%), reduced service hours, and lower staff qualification requirements. These changes undermine the evidence-based program design that distinguishes Head Start (which is the gold-standard in early childhood education) from traditional childcare and responds to the more intensive needs of the children Head Start serves. The NPRM projects that, nationwide, these changes will reduce the annual investment in Head Start by as much as \$2 billion. Equally concerning, scaling back the quality and intensity of services provided by Head Start reduces the impact of those services, diminishes the results for children and families, and undermines the return on the federal investment and positive local economic impact.
- Reduces number of children served. One of the main justifications offered for the proposed changes is the suggestion that weakening of ratios, teacher qualifications and wage standards will allow more children to enroll in Head Start. In fact, larger class sizes, reduced support for children and teachers dealing with challenging behaviors, reduced professional development, and diminished compensation are all likely to increase staff turnover, exacerbate existing challenges in hiring and retaining skilled and experienced staff, and *reduce* the number of children who can benefit from the program.
- Shifts administrative burden. The NPRM says that once the performance standards are eliminated, programs can refer to the Head Start statute and relevant state childcare regulations to understand the expectations to which they will be held accountable. This shifts the burden of compliance to program staff, who will have to search through multiple federal and state statutes and regulations rather than reviewing one consolidated set of performance standards.
- Loss of national standards and accountability. Head Start programs are concerned that the elimination of performance guidelines would leave rules open to subjective interpretation, possible allegations of performance lapses, unclear expectations and guidelines for allowable programmatic costs, and potentially the termination of grants.
- Risk to enrollment and workforce stability. The NPRM asserts that greater flexibility will allow programs to serve more children. In fact, larger numbers of children in each classroom, fewer resources to address challenging behaviors, and reduced compensation/qualifications will likely make already difficult teacher recruitment and retention even more challenging, increasing turnover and leading to classroom closures and *lower* enrollment.
- Head Start is not simply childcare. Head Start serves children and families with more intensive needs, and provides comprehensive, two-generation supports. These services require standards beyond basic state childcare licensing requirements. These children, on average, require more individualized attention, more frequent behavioral and developmental support, closer supervision, and more time from each

teacher than the population state ratios were calibrated to serve. State ratios were designed for safety in general childcare settings, not high-quality education in a Head Start setting.

Our bottom line: surgical reform of the performance standards could be helpful, but the proposed wholesale elimination of guidelines would be devastating. Eliminating the national framework of Head Start standards will replace clear expectations with uncertainty, and sacrifice the evidence-based service quality and intensity that drive results for vulnerable children and families.

Numbers of Children Served

California Head Start programs are deeply troubled by the likelihood that implementation of the NPRM would result in a significant reduction in the number of children and families that can participate. Ironically, the proposal anticipates expanded class sizes and cost savings that programs will reinvest into serving more children. Instead, our judgment is that increased numbers of children in classrooms, reduced mental and behavioral health supports, and heightened pressure and stress on staff will elevate turnover, increase staff vacancies, and drive a net *reduction* in the number of children served.

No Head Start grantee wants to serve fewer families, and we share ACF's goal of enrolling more children. But we reject the premise that enrollment declines over the past decade have been caused by regulation, rather than by economic forces beyond programs' control, especially at a time when parents have sought extended daily hours of service.

Between 2016 and 2025, several economic factors converged that increased the cost of quality services, resulting in reduced Head Start enrollment nationally and specifically in California. These include, but are not limited to:

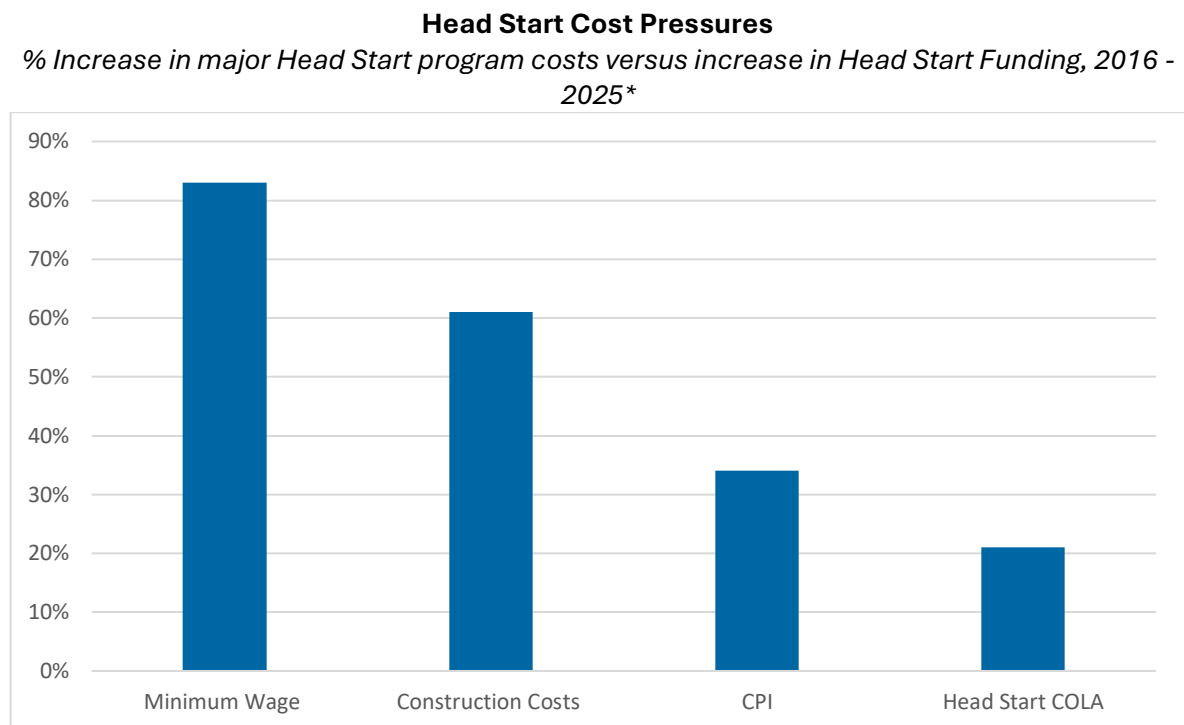
- **Minimum wage.** California's standard minimum wage rose 83%, from a base of \$9 in 2015 to \$10 in 2016, to \$16.90 per hour in 2025. The fast food minimum wage doubled, from \$10 to \$20 per hour. The healthcare worker minimum wage increased 150%, from \$10 to \$25 per hour.^[1]
- **Insurance.** Commercial property insurance rates rose 10.3% in 2023 alone. Commercial auto insurance premiums have more than doubled over the past decade.^[2]
- **Construction costs.** In eight of the last ten years, California construction costs have outpaced general inflation—by an average of 3.27 percentage points annually. In one year, construction costs rose 13.4%, compared to a general inflation rate of just 1.4% and a Head Start COLA of 1.22%.^[3]
- **Transitional kindergarten.** California's rollout of transitional kindergarten has elevated demand for qualified early childhood teachers, and TK's higher pay structure has drawn qualified staff away from Head Start. TK has also displaced many grantees from lower-cost space on elementary school campuses into far more expensive alternative facilities.^[4]

During this period of more than a decade from 2016-2025, Congress increased the Head Start appropriation by 21%, but that increase failed to keep pace with the rising cost of the inputs

programs depend on. Programs that have reduced their funded enrollment in order to redirect funding toward staff compensation report the payoff directly: lower turnover, reduced administrative burden, and improved child outcomes.

It is these converging cost pressures—not the 2016 or 2024 Performance Standards—that account for the slot reductions ACF seeks to reverse. We would further note that if ACF's internal analysis points to the 2016 and 2024 rulemakings specifically, the proportionate response would be to reconsider those two rules, not to rescind the entire regulatory framework of the Head Start Program Performance Standards.

The table below summarizes cost trends against Head Start funding growth over the same period; more detail is provided in Appendix B.



*Minimum wage shown is the base state minimum wage, not inclusive of higher fast food and healthcare minimum wages.

No Statutory Authority to Reduce Quality, Scope and Services

Although the Administration for Children and Families has the authority to update and revise the Head Start performance standards, we agree with House Education and Workforce Subcommittee on Early Childhood, Elementary and Secondary Education Chairman, California Congressman Kevin Kiley, that major changes to Head Start - such as those anticipated by this proposal - should be led by Congress. In fact, Sec. 641A(a)(2)(C)(ii) of the Head Start Act prohibits revisions to the standards that would "result in the elimination of or any reduction in quality, scope, or types of . . . services required to be provided" as of December 12, 2007, the date of enactment of the Improving Head Start for School Readiness Act of 2007. This provision, sometimes referred to as the "non-degradation clause," was included in statute by Congress to ensure that future Administrations could not undermine

through rulemaking the quality, comprehensive services the legislature intended for Head Start to provide. We believe that this NPRM, and the elimination of the performance standards, violates this provision of statute and is therefore invalid.

To give just one detailed example of many: the 2007 law added Sec. 645A(b)(6), which requires Early Head Start programs to ensure that children with documented behavioral challenges, including those related to prior or ongoing trauma, receive appropriate screening and referral. Section 1302.17 is the regulatory mechanism that operationalizes this statutory duty. It is the vehicle through which mental health consultation, referral, and sustained support — rather than expulsion — are actually delivered to the child. While the specific procedural limits in § 1302.17 were codified in the 2016 rule, they exist to implement a service obligation that has been statutorily required since December 12, 2007. Stripping the regulation without replacing its function risks precisely the "reduction in quality, scope, or types of services" that Sec. 641A(a)(2)(C)(ii) forbids, leaving the statutory promise of screening and referral for traumatized children as an empty shell with no enforcement mechanism.

The NPRM suggests that the proposed elimination of Head Start performance standards need not result in changes to program operation or services if programs opt to continue to follow the existing performance standards by choice. This is contradicted by the estimated \$2 billion annual reduction in Head Start program costs projected to be achieved by larger numbers of children in classrooms, reduced standards for qualifications and training, and elimination of expectations for program hours and supports. These are the very "quality, scope and types of services" the statute explicitly protects from downward adjustments.

The proposed revisions also appear to violate Sec. 641A(a)(1)(B)'s requirement that performance standards be "scientifically based." The NPRM cites little research to support the specific changes proposed. Appendix A hereto provides a body of research supporting retention of the existing standards, further underscoring the absence of an evidentiary basis for the proposed changes.

Flexibility

The NPRM states that removing requirements gives programs the *option* to change operations, and that programs may opt to maintain their current practices. But HHS has already established, through ACF-OHS-IM-26-01 on program scope reductions, in the language of the NPRM, and in public statements by leadership since the release of the proposed changes, that it expects programs to serve more children with the same (or lower) level of funding. Programs are well-aware of this pressure, and it will shape their decisions regardless of whether the NPRM describes the ratio change as optional.

Once a program makes changes in response to that pressure, it will face the same dynamic at its next grant renewal, and the one after that. Each incremental increase in class size or reduction in staffing further strains teachers, degrades the scope and quality of services children receive, and normalizes the expectation that programs can serve more children with the same resources.

Notably, the current Performance Standards already provide a mechanism for programs to

seek flexibility where it is genuinely warranted: the locally-designed option waiver process allows a program to demonstrate, with supporting evidence, that a variation from the standard ratio or group size would better serve the needs of its community while still maintaining minimum protections. This existing pathway shows that Head Start does not need to eliminate the federal ratio floor to accommodate legitimate local variation. And, unlike the proposal in the NPRM, the existing tool protects quality and safety by requiring programs to justify proposed departures from the quality standard.

The Purpose of the Head Start Standards

The Head Start Program Performance Standards offer consistent guidance to Head Start programs nation-wide regarding meeting the requirements of statute, complying with the terms and conditions of their grants, and, most importantly, providing comprehensive services at the level of quality and intensity that result in the outcomes the nation expects from Head Start. Within that guidance, programs have flexibility to adjust for community and family circumstances, local needs and resources, and parent input and preferences. Head Start programs in Yuba City are not identical to those in Bakersfield or Palm Desert, but they share a baseline of quality in service delivery derived from the expectations and guidelines in the performance standards.

The Head Start Act requires the Secretary to establish, by regulation, standards across a range of enumerated categories, including but not limited to: service standards, education performance standards, administrative and financial management standards, and facility standards (Sec. 641A(a)(1)). One example illustrates the stakes of treating these obligations as optional: Sec. 642(d)(1) requires the Secretary to develop policies and procedures for resolving impasses between an agency's governing body and policy council. The current Standards implement this mandate through the impasse procedures at § 1301.6, which include a defined dispute-resolution timeline, mandatory mediation, and binding arbitration where mediation fails. The proposed rule eliminates § 1301.6 in its entirety, and does not replace it with any alternative dispute-resolution mechanism. Because Sec. 642(d)(1) requires the Secretary to have such procedures in place, removing them without a substitute leaves the agency without any regulation implementing this statutory mandate, in violation of the Act.

Contrary to the assertions of the NPRM, state childcare licensing standards are not a substitute for the Head Start performance standards. Historically, childcare student-teacher ratios were driven by considerations such as how many children each adult could evacuate in the event of a fire; whereas Head Start standards answer the question of how many high-needs children each adult can effectively educate. The performance standards are based on research and evidence regarding how best to produce outcomes for Head Start children and families, which have greater challenges and need for supports than the general population for which childcare licensing standards are intended.

Applicability of state standards is not clear-cut, increasing the administrative burden on Head Start program staff. California, for example, has multiple different sets of legal standards for teacher-child ratios and it is unclear which standard would apply to Head Start. The NPRM notes in several places that in some cases, state standards have increased over the years since the current Head Start performance standards were initially enacted,

implying that the performance standards are no longer needed. To the extent that state regulations are becoming more rigorous, it is because states are reviewing research on improved early childhood outcomes that come about as a result of practices like smaller group sizes and more individualized attention, and attempting to come closer to the high-quality bar set by Head Start. The single most important predictor of program quality and outcomes is the child to staff ratio, with child to teacher ratios of 7.5 to 1 associated with stronger cognitive outcomes for children. The additional individual attention and instruction teachers can offer when they have fewer children in their charge is also associated with reductions in challenging behaviors in the classroom and fewer preschool expulsions. They are also associated with reduced teacher stress, burnout, and turnover. Conversely, research shows that states with very low-cost pre-kindergarten programs that offer large group sizes, low wages, limited hours, and teachers with minimal training and experience do not produce the results found in Head Start. While the federal government cannot and should not control state standards, it must not use federal taxpayer dollars to prompt a race to the bottom.

State childcare licensing standards do not address the full array of supports required in the Head Start Act. Even if state childcare licensing standards provided for the teacher-child ratios and expert support Head Start children need to thrive, states do not have licensing criteria for the comprehensive health, mental health, dental, developmental, screenings and other vital child services Head Start offers. Nor do they address parent governance and the two-generation services that help parents stabilize their families and lift them out of poverty. These differences matter for achievement of results and national return on the investment in Head Start. Small class sizes and ratios, and supports that help staff meet the needs of children experiencing trauma or displaying dysregulation in the classroom, drive school readiness, executive function, and other important child outcomes.

Compliance with state standards may not achieve the cost savings assumed in the NPRM. Head Start programs have classrooms with appropriate square footage, sufficient toileting facilities, furniture and equipment, and outdoor space for compliance with the Head Start standards. While looser childcare licensing may permit 25% more children in a room with the same number of staff, the classroom square footage regulations may prohibit an increase of that magnitude without costly adjustments to the physical space. Facilities with adequate numbers of toilets and appropriate outdoor space for physical activity may not accommodate the increased number of children anticipated in the NPRM, requiring programs to move walls, expand bathrooms, acquire additional outdoor square footage, or relocate entirely to add the numbers of children anticipated in the proposal. Due to California building codes, many centers have a strict occupancy limit of 100 infants and toddlers that cannot be overcome without investing millions of dollars in renovations^[5]. Achieving the cost savings assumed by the NPRM would likely require an *increased* investment in rent, renovations, furniture, equipment, and supplies. In short, under the NPRM, taxpayers would be paying more for adaptations that still result in children getting less.

The existing performance standards reduce administrative burden on busy program staff by consolidating the unified, nation-wide policy governing what Head Start programs are expected to do to meet the needs of vulnerable children and receive continued funding to serve families in their community. The lack of guidance is presented as “flexibility.” In reality, it creates burden, uncertainty and risk for every Head Start site, its staff, and the children and

families they support. In the absence of the performance standards, each center director would have to refer to the Head Start statute, the scant number of remaining Head Start standards, some yet-to-be-released guidance from the Office of Head Start, and a patchwork of federal and state laws and regulations to understand what they are expected to do, and what they will be evaluated on when they are monitored and when their grant applications are resubmitted. This is a serious administrative burden for center personnel who are already stretched thin. The lack of clarity introduces uncertainty and stress for program staff and parents alike as programs attempt to research, identify, and comply with a cobbled-together set of expectations derived from legislative language and regulations rather than referring to a single, unified set of performance standards.

The performance standards support consistent program monitoring and evaluation. Without clear standards, program monitoring will potentially be subjective, inconsistent, and ultimately ineffective at ensuring a high-quality program. Deficiencies in the monitoring process could lead to increased competition for grants and turnover in Head Start grantees, creating additional administrative burdens at both the program and federal levels that are highly unlikely to result in program quality improvements.

For all of these reasons, HSC urges ACF to retain a single, comprehensive set of performance standards that offers consistent performance expectations for all Head Start programs nationwide and retains high-quality standards related to group sizes; teacher-to-student ratios; intensity and duration of services; staff qualifications; and other evidence-based program design elements that are driven by research on effectiveness and outcomes for at-risk young children and families.

Comments on Specific Standard Areas

While HSC is requesting a full withdrawal of this proposed rulemaking, we would also like to offer the following comments on specific aspects of the proposal.

Retain the Housing Cost Adjustment The proposal to eliminate the housing cost adjustment at § 1302.12(i)(1)(ii) rests on the assertion that the adjustment "exceeded statutory authority" for which the NPRM offers no legal analysis and no evidence of detrimental impact. In our view, ACF's conclusory characterization does not meet the standard required to justify rescinding a provision under the Administrative Procedure Act. Far from being a regulatory burden, the optional housing allowance provides programs the flexibility needed to enroll families that, in the absence of childcare, would be eligible for public assistance. The housing cost adjustment serves a critical and practical function: it allows programs to account for the reality that income alone does not capture a family's true economic circumstances, particularly in high-cost regions like California, where housing costs routinely consume a disproportionate share of family income.

HSC urges ACF to retain the housing cost adjustment.

Retain flexibility for enrollment by self-attestation. The NPRM's proposed § 1301.02(c)(4), which states that "self-attestation does not satisfy the eligibility requirements," would strip away a critical enrollment pathway for the families Head Start is designed to reach, at their moment of greatest need. Current § 1302.12(i)(3)(ii) expressly permits a program to accept

"the family's signed declaration" that a child is homeless when no other documentation is available. That flexibility exists because homelessness, by its nature, often destroys or makes inaccessible the paperwork a family would need to prove eligibility. Eliminating self-attestation does not make these families less eligible or less in need of services—it simply makes it harder, and in many cases impossible, for programs to enroll them.

The practical effect of this proposed new provision will be to disenroll or bar enrollment for children experiencing homelessness precisely when stability and early learning support matter most. The proposed new inflexibility would undermine, rather than advance, the statutory purpose of the Head Start Act and directly contradict ACF's stated rationale that this rule is meant to "restor[e] flexibility to local Head Start programs."

The NPRM does not present any evidence of widespread fraud or abuse arising from the current policy of flexibility. But the harm to California children if the proposed change were to be made final is not theoretical. Each fire season, Head Start programs across the state enroll children whose families have lost their homes, and with them, every document a program might otherwise require. Obligating such families to produce documentation effectively excludes from Head Start children displaced by disaster. Congress anticipated this dynamic when it directed, at Sec. 640(m) of the Act (42 U.S.C. 9835(m)), that the Secretary "shall issue rules" removing barriers to enrollment and participation for children experiencing homelessness, including allowing such children "to apply, enroll in, and attend Head Start" while any required documentation is gathered. Removing self-attestation for this population does more than create friction. It is counter to the Secretary's statutory duty to remove barriers to enrollment for homeless children, a duty that indisputably extends to families displaced by wildfire under the McKinney-Vento-aligned definition of homelessness.

The same problem extends to families reporting no income. Current § 1302.12(i)(1)(iv) allows a program to accept "the family's signed declaration" of zero income. Families with no income are, definitionally, those least able to produce documentation such as pay stubs or tax filings—they have nothing to document. Removing self-attestation does not contribute meaningfully to program integrity, but it does remove the only mechanism by which the neediest families can be enrolled. The result is a rule that disproportionately screens out the families with the least income and the most acute need, contrary to the core eligibility priorities Congress established in the Act.

The proposed elimination of self-attestation would also effectively bar enrollment for foster children placed in emergency kinship care¹. When a child is removed from a parent's home due to an emergency—domestic violence, for example—and placed with a relative rather than through a formal foster licensing process, the kinship caregiver often has only their own attestation that the child is in their care while the parent's situation is resolved. Formal custody documentation, court orders, or licensing paperwork frequently lag weeks or months behind the placement itself, particularly in crisis situations where the priority is the child's immediate safety rather than paperwork. A kinship caregiver who cannot produce court-issued custody documentation because none yet exists would be unable to enroll the child under the proposed rule, even though the child's need for a stable, supportive early learning environment is especially acute during this period of family disruption. Requiring

¹ <https://cdss.ca.gov/inforesources/foster-care/kinship-care>

documentation that does not yet exist, and may not exist for months, does not protect against improper enrollment—it simply excludes children in crisis from the program precisely when stability matters most.

The NPRM cites FY 2024 Office of Head Start monitoring data showing that roughly 7.6 percent of files reviewed relied on self-declared income or zero-income declarations as justification for the proposed change. The NPRM assumes, without evidence, that these determinations were fraudulent or improper. In fact, this number establishes only that the existing flexibility is being used as designed, for the modest percentage of Head Start families who need it. The NPRM fails to present any evidence that this flexibility has been exploited to secure fraudulent enrollment of children whose families would otherwise be able to pay for the childcare and services they receive through Head Start. Notably, ACF's own monitoring data shows only 0.58 percent of files reviewed were found to be in error at all, undercutting the implicit premise that self-attestation is a significant vector for fraud, waste, or abuse. HSC recommends retaining the current standards allowing self-attestation.

Retain requirements for classroom inclusion rather than removal. HSC strongly opposes the proposed elimination of § 1302.17, which currently limits suspension and prohibits expulsion of disruptive children from Head Start classrooms.

Head Start serves children from backgrounds that often include trauma, and behavioral challenges are frequently the manifestation of that trauma. They are a young child's cry for help, not a disciplinary problem to be managed by removing the child from care. Section 1302.17 reflects this understanding. Removing this standard eliminates the expectation that children with behavioral challenges be supported rather than banished.

The proposed change is also operationally counterproductive. Enrolling a child only to later expel that child squanders the very capacity the Performance Standards exist to protect. It burdens programs with the administrative work of processing an expulsion and then recruiting and enrolling another child to fill the vacated slot, when that same effort and resources could be dedicated instead to the individualized and differentiated instruction, mental health consultation, referral coordination, and family engagement that facilitates ongoing services. To our knowledge, California does not have state licensing regulations that independently limit suspension or prohibit expulsion in early childhood settings. Removing this standard would therefore not simply shift responsibility to a state framework already equipped to protect these children; it would leave a regulatory gap in California, with no floor at all. ACF's own preamble acknowledges that this rule is not an endorsement of suspension and expulsion as appropriate responses to behavioral concerns; if so, the standard that operationalizes that judgment — and gives effect to Congress's 2007 statutory mandate — should remain in the regulation, not be left to inconsistent, uneven state and local policy.

It must be underscored that, in a context of limitations on suspension and prohibition of expulsion, preservation of the educational and developmental value of the classroom for all children requires adequate staff ratios, appropriate group sizes, and ability to access additional classroom supports and resources for children, families, and staff when and as needed. Eliminating standards that limit suspension and prohibit expulsion in an environment of maximum group sizes, minimum teacher to child ratios, and absence of supplemental supports undermines the quality and outcomes of Head Start for all children

and families and must not be permitted.

HSC recommends retention of the existing standards prohibiting suspension and expulsion, and retention of the class sizes, ratios, and developmental resources needed to make the standard viable.

Retain Standards that advance English acquisition with flexibility. English acquisition is an essential goal for Head Start children, and nothing in the current Performance Standards suggests otherwise. But mandating English-only instruction is not the same as supporting English acquisition. In fact, English-only instruction has been widely demonstrated to *undermine* English acquisition and literacy development, particularly for young children, as demonstrated in the studies listed in Appendix A.

Current § 1302.31(b)(2)(i) requires that, for an infant or toddler dual language learner, teaching practices focus first on the development of language skills in the home language when there is a teacher with appropriate language competency. Proposed § 1301.04(a)'s English-only mandate reverses this standard, which is grounded in research on how best to promote language development in young children.

Local programs, the teachers working with children, and children's parents are better positioned than ACF to determine, child by child, how to sequence and balance language exposure to serve both English acquisition and each child's individual developmental and emotional needs. Head Start staff navigate this balance successfully on a daily basis, particularly in California's Migrant and Seasonal Head Start programs. Children of farmworker families whose seasonal labor is needed in agricultural industries frequently arrive with no English proficiency. A rigid instructional mandate leaves no room for the program to meet the child where they are. The proposal conflicts with the NPRM's stated goal of flexibility for local programs, replacing a standard that allows programs to tailor language practices to their population with an inflexible federal mandate.

The proposed new mandate is not only inflexible and ineffective; it also contravenes the requirement of the Head Start Act that services be delivered in a "developmentally, culturally, and linguistically appropriate manner." Further, the Act includes the express direction that literacy training for Head Start teachers "support children's development in their native language" (Sec. 642(e)(2)(B)). The Act separately defines children with limited English proficiency (LEP) at Sec. 637 and requires the Secretary to modify standards for LEP children to include progress toward English acquisition while making meaningful progress across all developmental domains (Sec. 641A(a)(1)(B)(x)). These are statutory obligations that continue to bind programs and the Secretary.

An English-only instructional mandate is in direct conflict with this statutory framework. The preamble to the NPRM acknowledges, but does not resolve, this conflict. While the NPRM states that programs must continue to comply with the Act's LEP requirements, it would simultaneously mandate an instructional approach that makes meaningful compliance with those requirements far more difficult, and even functionally impossible in classrooms where no staff speak the children's home language.

This conflict with statute is compounded by the non-degradation clause. The recognition in

the current performance standards at § 1302.31(b)(2), "bilingualism and biliteracy as strengths" and its requirement of research-based, home-language-supportive teaching practices for dual language learners operationalize that pre-existing statutory floor. An English-only mandate that eliminates home-language instruction and communication as an available practice reduces the type and quality of language-related services below what programs were already providing, consistent with the Act's 2007 requirements.

The English-only mandate also raises a basic interpretive question the NPRM does not answer: is American Sign Language considered "English" for purposes of proposed § 1301.04(a)? If not, programs serving deaf, hard-of-hearing, or deaf-blind children would be placed in an impossible position - required to instruct in spoken/written English while lacking any exception that would allow ASL instruction and communication to continue. Programs cannot assume that a rule silent on ASL can be read to implicitly permit it; ACF should clarify this ambiguity before finalizing the rule.

Head Start programs, including many in California, serve refugee children who have experienced significant trauma prior to enrollment. For these children, a classroom where a teacher can communicate in their native language is often the difference between a genuinely welcoming, stabilizing environment and one that compounds a child's sense of dislocation. An English-only mandate does not account for this population's particular vulnerability and would prohibit native-language communication for children who most need it to feel safe enough to engage in learning.

An English-only instructional mandate would chill enrollment among the vulnerable children Head Start is meant to reach, particularly California's migrant farmworker families, for whom the ability to communicate with staff in their home language is often the reason the family enrolls. Families whose children are not yet English-proficient may reasonably conclude that a program unable to communicate with their child in a language the child understands cannot meet that child's needs. If children still acquiring English are not enrolled in Head Start, they will arrive at kindergarten without the benefit of early English acquisition, shifting the burden from Head Start, where it is well-suited to be addressed, onto public elementary schools, unnecessarily delaying the child's skills development and learning.

Likewise, the mandate for English-only instruction and likelihood of staff who speak only English creates potential safety hazards in programs that serve young children. In a classroom where teaching staff are only capable of speaking English, programs have no viable way to communicate with a child in the child's home language in the event of emergencies, such as an earthquake or fire, an allergic reaction, or an injury. Failure to communicate in the child's home language in situations where a young child's ability to understand instructions in a second language may be limited or nonexistent due to stress, can pose additional danger to the child, the teacher, and the other children and adults around them. This is not merely an educational quality concern; it is a child safety concern created by the NPRM without a justifying benefit.

The English-only requirement would also create an unfunded mandate. The Regulatory Impact Analysis estimates a one-time cost of \$46,917,500 to replace classroom materials, plus \$51,696,186 in staffing-related retraining and recruitment costs under its primary scenario, and separately estimates approximately \$139 million in employment-disruption

harm to displaced teachers under its primary scenario. The \$2,500-per-classroom materials figure substantially understates the real cost programs will bear. That estimate is built on replacing "frequently used curricula and related teaching materials" at \$2,000 and materials "that have words" at \$500. A full-scale replacement of a classroom's curriculum, books, posters, and other learning materials will run considerably higher than \$2,500 in any classroom whose instructional environment has been built to support English acquisition for children who natively speak other languages. Absent funding to cover the actual cost of replacement, programs will be forced to divert scarce resources away from direct child services to comply, directly undermining the quality and scope of services Head Start is designed to provide.

HSC recommends that the English-only instructional requirement be deleted from the final rule.

Retain Staff-to-Child Ratios and Group Size Requirements

The Proposed Rule would rescind the current staff-to-child ratio and group size requirements at § 1302.21(b) and require only that programs comply with applicable state and local law. The NPRM estimates that this would increase class sizes by 16 – 32%, with the number of Head Start teachers nationwide falling from 105,423 to as few as 80,078. HHS projects this would reduce personnel expenditures by roughly \$668 million annually. These estimates describe a substantial loss of the individualized attention and supervision the ratios are designed to provide, reducing the overall quality of the program. This sits in direct tension with the non-degradation clause.

Deferring to state childcare ratios assumes those ratios are appropriate for use in a Head Start classroom. They are not. The state's determination that a ratio is adequate for a general population childcare classroom is not evidence that the same ratio is adequate for a Head Start classroom.

Adding more children to each teacher's responsibility is not a neutral administrative adjustment — it is a direct increase in safety risk. Every additional child assigned to a teacher means less time and attention available to notice a child wandering off, a medical event, or a behavioral crisis before it escalates. This risk compounds for children with disabilities, who often require more constant supervision or individualized behavioral support, and for infants and toddlers, where ratios exist specifically because very young children cannot reliably self-regulate or communicate distress. A 16 to 32 percent increase in children per teacher is not a marginal change in workload; it is a proportional reduction in the amount of attention and protective supervision available to each child in the room at any given moment.

Higher ratios also compound risk indirectly, by accelerating teacher burnout and turnover. This risk is compounded further by the May 2025 Notice of Proposed Rulemaking that would rollback provisions that improved Head Start staff wages and benefits. Asking teachers to take on more children while holding flat or reducing the compensation associated with that work is likely to accelerate turnover beyond what either change would cause on its own. Turnover also directly lowers the quality of education children receive: young children, especially those with elevated needs, benefit from stable, consistent relationships with a familiar teacher who understands their individual behavior, developmental progress, and

triggers. Frequent staff turnover disrupts that continuity, forces children to repeatedly adjust to new adults, and increases the share of classroom time spent orienting new staff rather than delivering instruction. The research in Appendix A to this comment addresses this relationship in greater depth.

California has multiple standards for ratios, including: Title 22 (licensing regulations that apply to childcare centers and family childcare homes); Title 5 (applies to the California State Preschool Program); other Title 5 (non-California State Preschool Program, applies to state-run programs with other formats, such as Migrant Childcare and the General Childcare Program). While we believe, based on the NPRM preamble, that ACF intends Title 22 would apply to most Head Start programs, the proposed regulations are unclear and simply refer to state law. Some California teacher-child ratios, noted as (LAW) in the table below, are formalized in state regulations. Others, noted below as (PIN), are included in provider information notices. PINs are not technically regulations, and it is unclear whether they would apply to Head Start.

Age Group	Title 22	Title 5 (Non-CSPP)*	Title 5 (CSPP)	HSPPS
0-18 months	1:4	1:3 adult-child 1:18 teacher-child	N/A	2:8 or 3:9 Max 4 per adult
18 – 24 months	1:12 (law) 1:6 (PIN)	1:4 adult-child 1: 16 teacher-child	N/A	2:8 or 3:9 Max 4 per adult
2 years	1:12 (law) 1:6 (PIN)	1:4 adult-child 1: 16 teacher-child	< 8 or <30%: 1:8 adult-child 1:24 teacher-child >8 or >30% 1:4 adult-child 1:16 teacher-child*	2:8 or 3:9 Max 4 per adult
3 years	1:12	1:8 adult – child 1:24 teacher-child	1:8 adult-child 1:24 teacher-child	2:17 single session 2:15 double session
4-5 years	1:12	1:8 adult – child 1:24 teacher-child	1:8 adult-child 1:24 teacher-child	2:20 single session 2:17 double session

*Temporary authorization to serve two-year-olds per state budget expansion, expires June 30, 2027

Assuming that California's Title 22 would apply to most Head Start programs, the table below displays scenarios with program impacts. Across the board, the same number of children would have fewer teachers, and/or the same number of teachers would have their attention spread across a significantly greater number of kids.

Age Group	HSPPS -> Title 22 Δ
0-18 months	3:9 -> 1:4 = 3 teachers care for 12 instead of 9 children
18-36 months (if state regs apply) (if PIN applies)	3:9 -> 1:12 = 3 teachers care for 36 instead of 9 children 3:9 -> 1:6 = 3 teachers care for 18 instead of 9 children
3 years	Single session: 2:17 -> 1:12 = 2 teachers care for 7 more kids Double session 2:15 -> 1:12 = 2 teachers care for 9 more kids
4-5 years	Single session 2:20 -> 1:12 = 4 more kids Double session 2:17 -> 1:12 = 7 more kids

The proposed regulation would require programs to maintain ratios "consistent with" state and local licensing law. "Consistent with" is ambiguous: it could be read, as HHS apparently intends, to permit programs to maintain ratios stricter than the state minimum. But it could just as easily be read, by a future administration, to mean that a program's ratio must exactly match the applicable state standard, eliminating the purported option to maintain existing quality. HHS cannot guarantee that the "flexibility" it promises today will survive a change in administration when the regulatory text itself does not clearly preserve that flexibility.

HSC recommends that ACF retain the current staff-to-child ratio and group size requirements at § 1302.21(b) in their entirety. Should this recommendation be disregarded, we would secondarily recommend that the new standards clearly permit programs to set - and be funded for - ratios anywhere on the spectrum between the current ratios and state minimums, using regulatory language that unambiguously preserves *program* discretion rather than the "consistent with" formulation discussed above.

Retain Flexibility to Help Families Meet Their Goals. The proposed new requirement that programs "provide educational material and instruction that demonstrate healthy marriage as a positive good" (proposed § 1301.06(b)) is a significant departure from current standards, which already require Head Start programs to support healthy parent-child relationships and family partnership. The existing Standards emphasize support for the relationships and goals identified by parents for their families (see § 1302.46; § 1302.34(a)). A federal mandate to instruct parents on the value of marriage substitutes the federal government's judgment in place of parental judgment. The proposed mandate is particularly problematic for programs serving parents and children who have fled domestic violence, for whom messaging that frames marriage as a "positive good" could be unhelpful at best, and at worst, harmful or

retraumatizing.

This requirement also cuts against the Head Start Act's mandate that programs provide "linguistically and culturally appropriate" services (Sec. 640(a)(2)(C)(i)) and meet "the diverse needs of the population served." Marriage is not universally valued or practiced in the same way across the cultures and communities Head Start serves, and a one-size-fits-all instructional mandate promoting marriage as a positive good does not account for that variation. Rather than supporting culturally responsive family engagement, as the current Standards require, this proposal would impose a specific normative message about family structure on all enrolled families regardless of their cultural background, family composition, or personal circumstances.

Further, this new mandate is impossible to reconcile with the NPRM's stated purpose of reducing federal burden and giving programs greater flexibility to tailor services to local needs. On this point, ACF moves in the opposite direction — replacing programs' current discretion to determine what family engagement content is appropriate for the families they serve with a specific, federally mandated instructional message. A program serving a community with a large population of domestic violence survivors, or a community where marriage carries different cultural meaning or is simply not the norm, is given no flexibility to adapt this requirement to that reality. The inconsistency undercuts the Proposed Rule's own justification.

For these reasons, HSC recommends that the proposed requirement to provide educational material and instruction demonstrating healthy marriage as a positive good not be included in any final rule.

Retain Family-Friendly Service Duration Standards. ACF frames the elimination of minimum service duration requirements as a matter of local flexibility. Its own Regulatory Impact Analysis assumes otherwise, projecting that programs will pay teachers and home visitors up to \$580 million less annually as a result (combining the high-scenario reduction in teacher compensation from the center-based duration removal with the high-scenario reduction in home visitor staffing from the home-based duration and caseload removal). ACF has built its savings estimate on the premise that this rule will reduce the time children spend in Head Start classrooms.

A reduction in hours is a reduction in learning time, and a reduction in the scope and quality of the education Head Start is built to deliver. The existing duration requirements reflect a considered judgment about the dosage of early learning necessary to produce Head Start's outcomes; cutting that dosage by up to 99 hours a year, with no new evidence that less time produces equivalent results, is a substantive retreat from the program's educational mission, not a neutral act of deference. That retreat also cuts against the Secretary's statutory duty not to revise the Performance Standards in a manner that results in a reduced quality or scope of services from the 2007 threshold.

The consequences fall on families, and ACF acknowledges as much, noting the potential need for alternative childcare arrangements. An analysis by Together 4 Head Start estimates this cost in California at approximately \$663 per child per year. Families living below the Federal poverty line do not have \$663, or any comparable sum, available to absorb an

unplanned childcare gap. ACF's rule does not eliminate this cost; it shifts it off the Federal ledger and onto the families least able to bear it.

That shift also assumes alternative care exists. It often does not. Head Start is frequently the only provider in a community, particularly in rural areas: nearly half of all funded Head Start slots nationally are in rural Congressional districts, and a 2018 ten-state analysis found 48 rural counties that would have zero childcare options without Head Start. For families in these communities, and for many others where Head Start is simply the only slot a family could get, a shortened Head Start day is not solved by switching providers — there is no other provider to switch to.

Where alternative care is available, shortening the day creates a mid-day transportation problem that undermines the economic self-sufficiency goals of the Head Start Act. A parent whose child's Head Start day now ends at midday must leave work or arrange for someone else to transport that child to a second care setting — an obligation many working parents cannot meet without jeopardizing their employment.

Nor can a second, unaffiliated arrangement replace what is lost. Head Start's value lies in the integration of comprehensive early education, health and developmental screening, nutrition, disability services, and family support into a single setting delivered by one coordinated program. A child who spends part of the day at Head Start and part of the day elsewhere does not receive the same services in a different location. They receive fewer of the services Head Start was built to provide.

As with the proposed removal of staff-child ratios, ACF's flexibility framing does not survive contact with its own cost analysis. An agency that quantifies and relies on an assumed reduction in service hours to justify its savings estimate has already conceded the rule will reduce those hours, and has offered no reasoned basis for concluding that reduction is consistent with sound early childhood practice or the statutory purposes of the program. HSC recommends that the existing standards for minimum service duration be retained.

Retain Clear Expectations for Home Based Services. The Proposed Rule eliminates every federal standard governing the home-based option: caseload limits, service duration, make-up requirements, home visit content, and curriculum. Further, this is not a case where the Act independently preserves the substance of the requirement. Section 645A(i)(1), the only Act citation ACF offers for this removal, establishes training and content standards for home visitor staff; it says nothing about caseloads, visit frequency, or service duration. The result of the Proposed Rule is a program option the Act recognizes but leaves with no operative standard governing how it is delivered.

This silence creates a genuine gap, not mere flexibility. The Proposed Rule does not state whether the home-based option remains an authorized program design, nor does it specify any minimum level of service a program must provide to a child enrolled through it. As drafted, nothing would prevent a program from enrolling a child, conducting a single home visit, and reporting that child as served for the year.

This ambiguity extends directly to program monitoring. Without any operative standard for the home-based option, programs cannot know in advance what they will be evaluated against,

and ACF cannot administer a "transparent and reliable system of review" against a standard that does not exist. As Deputy Assistant Secretary Alex Adams and Director Lizabeth Casco White have written, "Washington has an important role: set clear expectations, protect children and taxpayers, measure performance, and intervene when programs fail." HSC agrees. Here, the Proposed Rule sets no expectations at all. This is a reduction in the scope, quality, and type of services home-based programs currently provide, precisely what the Act's non-degradation clause is designed to prevent.

The loss of a federal quality standard would also jeopardize a funding stream many home-based programs currently rely on. Many Head Start home-based programs braid their funding with the Maternal, Infant, and Early Childhood Home Visiting (MIECHV) program, which requires grantees to operate high-quality, evidence-based home visiting models. Without any federal standard governing caseloads, service duration, or curriculum, Head Start home-based programs may no longer be able to demonstrate the model fidelity MIECHV requires, putting this braided funding at risk and further destabilizing the home-based option.

Given the Act's recognition of the home-based option and the Secretary's duty not to diminish the protections children currently receive when revising the performance standards, HSC recommends that ACF retain the existing requirements at §§ 1302.22 and 1302.35 in full. HSC, however, does not extend this recommendation to the 40:1 family service worker caseload ratio at § 1302.52(d)(2). California programs have reported that a fixed 40:1 ratio does not account for wide variation in caseloads across sites and family needs. HSC supports its removal, or in the alternative, revision to permit an average caseload across a program's sites rather than a fixed per-worker ceiling.

Retain Quality Expectations Family Childcare Homes. The proposed rule would eliminate both the 1,380-hour minimum annual service duration requirement for the family childcare option and the requirement that programs provide a child development specialist to support family childcare providers. As with the removal of center-based and home-based duration requirements discussed above, this change would likely violate the non-degradation clause. The Department's stated rationale — that family childcare providers voluntarily offered longer hours before the requirement existed, and can therefore be expected to do so again if the regulatory floor were removed — fails to acknowledge that a historical practice is not an ongoing commitment. Removing the regulatory floor removes the mechanism that ensures continuity for the working families and children who depend on it.

The elimination of the child development specialist requirement independently compounds this harm. Unlike center-based settings, family childcare homes operate as single-provider or two-provider settings with no on-site administrative or programmatic infrastructure; providers are independent, home-based, small-business owners. The child development specialist is not a redundant layer of oversight; the specialist is the mechanism by which family childcare providers receive regular, in-home professional support, including biweekly visits, compliance verification, facilitated communication with program staff and families, and referrals for technical assistance. Providers also rely on this role, and the broader program infrastructure it connects to, for guidance on health, nutrition, and other elements of comprehensive services that a provider operating alone cannot be expected to administer without support. Removing this requirement without any replacement safeguard, while simultaneously removing the duration requirement, eliminates the two central mechanisms

that allow the family childcare option to function as a comprehensive, quality-assured extension of the Head Start program.

This is a change with disproportionate consequences for California, which relies on the family childcare option far more heavily than most states. ACF's Regulatory Impact Analysis characterizes the family childcare option as representing "a very small share of all Head Start programs (approximately 1.3% of enrollment)" nationally, and appears to rely on that national figure to justify declining to quantify the costs of this change. Whatever the merits of that framing elsewhere, it does not reflect California's experience, where family childcare makes up a substantially larger share of Head Start capacity.

For these reasons, HSC recommends retention of the existing standards relative to family childcare homes, with one exception: the additional educational requirements for the second adult in the family childcare home.

Retain Standards that Ensure Screenings and Assessments are Effective. The NPRM proposes to rescind § 1302.33 in its entirety, including the timeline for developmental screenings and follow-up referral. ACF grounds this proposal in the position that the Act's own assessment and screening provisions render the regulatory timeline duplicative (Sec. 642(f)(5), (f)(6); Sec. 641A(b)(2)). The statutory provisions cited establish a minimal baseline for *what* screening and assessment tools should accomplish but impose no deadline for *when* screening must occur. The 45-day requirement is not duplicative of the Act; it is the only enforceable mechanism ensuring the Act's substantive requirements are implemented promptly rather than deferred indefinitely. Rescinding § 1302.33 eliminates the timing requirement altogether, leaving no regulatory floor in its place. This is precisely the kind of reduction below the current regulatory baseline the non-degradation clause is designed to prevent.

The timeline also serves a developmental purpose that a general "as soon as practicable" standard cannot replicate. Early identification of developmental, behavioral, or language concerns allows programs to begin the referral and support process while a child is still within the window in which intervention is most effective. A child who goes unscreened for months loses time that cannot be recovered later in the program year, regardless of how much support is eventually provided. Firm timelines exist because discretion in this context tends toward delay, not efficiency, which is detrimental to program quality.

The timeline also functions as an operational lever in programs' relationships with local educational agencies responsible for IDEA evaluations. Under current § 1302.33(a)(3)(i), a program must refer a child for formal IDEA evaluation "as soon as possible" once screening identifies a concern — but that referral clock only starts once screening happens. The 45-day deadline is what forces programs to generate the referral in the first place, which in turn creates pressure on LEAs to respond, since a program with a codified deadline has standing to escalate a stalled referral in a way a program with no deadline does not. In California, where LEA capacity and responsiveness to Head Start referrals already varies widely across school districts and Special Education Local Planning Areas (SELPA), removing the screening timeline eliminates the one point of leverage programs currently have to keep districts engaged. The predictable result is not increased flexibility, but increased delay. Rescinding § 1302.33 also eliminates the standards governing the characteristics of

screening and assessment tools themselves — requiring that they be valid, reliable, and administered by qualified personnel in a manner appropriate to each child's language and culture. These are not administrative formalities or duplications of other laws; they are what make the resulting data valid. A screening conducted with the wrong tool, by untrained staff, or without regard to a child's home language produces inaccurate information that leads to inappropriate or delayed intervention. Removing these standards would leave programs free to make screening and assessment decisions on the basis of convenience or cost rather than the evidence base the current standards require, with the resulting risk borne entirely by the children whose needs go unidentified or misidentified.

For these reasons, HSC recommends retaining the existing standards relative to screenings and assessments.

Retain Transportation Safety Requirements. The Proposed Rule would eliminate the requirement for at least one bus monitor during Head Start transportation services. ACF characterizes this requirement as "overly specific and detailed," but offers no analysis of the safety function bus monitors actually perform.

Head Start programs transport children ranging from newborns to five years of age, including infants and toddlers who cannot walk, cannot reliably communicate distress, and cannot independently exit a vehicle. A driver's primary responsibility, safely operating the bus, is incompatible with simultaneously supervising multiple non-ambulatory children in the passenger compartment. In a roadside emergency requiring evacuation, a lone driver responsible for evacuating, for example, two newborns and several children under five, cannot reasonably be expected to do both safely at once.

Removing the requirement is also likely to undermine the workforce stability ACF identifies as a priority elsewhere in the Proposed Rule. Requiring drivers to absorb child-supervision and emergency-evacuation duties in addition to driving increases the risk exposure, and therefore the reluctance, of qualified drivers to accept or remain in positions serving infants and toddlers.

This dynamic would also increase, rather than decrease, administrative burden on programs. Losing a driver requires programs to recruit, vet, and train a replacement before a route can safely resume. Elevated driver turnover driven by the removal of an on-board monitor would force programs to repeat this administrative and financial cycle more frequently, consuming staff time and resources that the Proposed Rule purports to free up elsewhere. Any personnel savings ACF projects from eliminating bus monitor positions would be at least partially offset by these increased recruitment, training, and administrative costs associated with higher driver turnover — a cost ACF's regulatory impact analysis does not take into account.

ACF's own regulatory impact analysis undercuts its characterization of this requirement as merely "detailed." The agency estimates that removing it will affect an estimated 5,130 bus monitor positions nationwide and eliminate up to \$59.9 million in compensation under the high scenario. A workforce and cost impact of that scale reflects a substantial existing safety function, not administrative excess. The "flexibility" ACF offers programs that wish to retain bus monitors is illusory without a corresponding funding guarantee. Nothing in the Proposed Rule requires ACF to continue funding these positions for programs that choose to keep

them, and nothing prevents ACF from treating that cost as unallowable or unnecessary in a future funding determination. Programs that believe retaining a bus monitor is essential to the safety of the children they transport have no assurance that the Department will fund that decision, even where the program's own judgment says otherwise. Removing this requirement also cuts against the non-degradation clause.

HSC recommends that ACF maintain the existing requirement at 45 C.F.R. § 1303.72(a)(4). HSC would potentially support a provision allowing programs to apply for a waiver of the bus monitor requirement when using smaller vehicles that transport only a few children, provided such waivers are subject to ACF approval and any applicable state or local safety requirements.

Retain Standards that Decrease Staff Turnover. Proposed § 1301.12(c) would prohibit programs from requiring or incentivizing staff to attain postsecondary education credits, hours, or credentials except in narrow, individually justified circumstances. HSC opposes this proposed provision.

Head Start wages are already so low that many staff salaries are below the Federal Poverty Line, and other provisions of this NPRM would depress compensation further by removing qualification requirements tied to pay. This follows closely on ACF's separate proposal to rescind the 2024 wage and benefit standards, "Restoring Flexibility to Support Head Start Program Access" (RIN 0970-AD21), which would leave pay low and uncompetitive. Where programs cannot compete on salary, supporting staff to advance their education has been one of the few tools available to improve retention and build a pipeline of qualified candidates. Prohibiting programs from incentivizing that advancement removes a low-cost retention strategy at the same time ACF is separately moving to depress wages, compounding rather than easing the workforce instability ACF elsewhere identifies as a concern.

This provision also undermines Head Start's role as a pathway out of poverty for parents. Programs are currently required to give hiring preference to current and former Head Start parents who apply and are qualified (§ 1302.90(b)(6)), and as a result roughly a third of Head Start staff are former Head Start parents. A parent who advances to become a qualified teacher, with a program's support in completing that education, helps move a family off reliance on taxpayer-funded income supports and into stable employment. That progression depends on programs being able to help parents get there. There is also a well-documented intergenerational link between a parent's own educational attainment and their child's outcomes; supporting parents' education is, in a real sense, part of educating the children Head Start serves. Prohibiting programs from incentivizing that attainment cuts off an effective anti-poverty and school-readiness mechanism.

The proposed prohibition is also difficult to reconcile with the Act. Congress specifically required that federal funds provided to help programs meet teacher degree requirements be used toward degrees conferred by an institution of higher education (Sec. 648A(a)(7)). A regulation prohibiting programs from incentivizing the same postsecondary attainment the Act itself directs federal funds toward cannot be squared with that statutory design. It also raises the same non-degradation concerns discussed throughout this comment.

The provision is also unworkable for a substantial share of California's Head Start providers. Approximately half of California's Head Start programs are operated by school districts, all of which are unionized, and many of the remaining nonprofit grant recipients are unionized as well. California Education Code section 45028 requires school districts to adopt salary schedules, and these schedules, along with the collective bargaining agreements governing both school district and nonprofit programs, typically increase compensation with educational attainment. These salary structures are legally mandated and contractually fixed; they cannot be eliminated or restructured simply because a federal performance standard changes, and a program subject to such a scale has no ability to stop incentivizing additional education even if this provision took effect. For unionized providers more broadly, unilaterally ceasing to recognize education in hiring or compensation would likely constitute prohibited regressive bargaining. To the extent ACF intends for affected programs to seek a waiver in these circumstances, that is not an adequate solution: a waiver leaves a program in limbo while its request is pending, unable to plan or implement its hiring or compensation practices with any certainty. If the waiver is denied, the program is left out of compliance with its own binding legal and contractual obligations through no fault of its own.

Children deserve a staff that understands what is developmentally appropriate and has the capacity to prioritize their needs, and an administration with the same or greater level of education to support that staff in its role. Fair compensation for an educated workforce raises the level of professionalism families have come to expect from Head Start and is part of the foundation that allows the program to give children in need a genuine head start in life. For these reasons, HSC recommends that proposed § 1301.12(c) not be implemented.

Retain Appropriate Standards for Staff. The proposed rule would eliminate the minimum qualification requirements at § 1302.91 for essentially all non-teaching staff. The Regulatory Impact Analysis confirms that the purpose and expected effect of this change is a reduction in workforce qualifications, not merely administrative flexibility. ACF states plainly that "removing these qualification requirements is expected to reduce average personnel expenditures" of approximately \$56.6 million nationally. In the absence of federal standards, and under pressure to reduce costs, programs will be pushed toward the same outcome ACF's own analysis anticipates: lower qualifications in exchange for lower personnel costs, at the expense of service quality.

This is difficult to reconcile with the Department's own public praise for the Head Start workforce. Assistant Secretary Adams has stated that "every time I get out and visit one of these Head Starts I always walk away impressed by the caliber of the staff. The teachers, the teaching assistants, the nutrition staff — some of the highest caliber people we've come across." That caliber is not incidental. It is a direct product of the qualification standards the Department now proposes to eliminate.

The proposal compounds this harm by eliminating the requirements that staff, consultants, and contractors demonstrate familiarity with the ethnic backgrounds and heritages of the families they serve, and that at least one classroom staff member or home visitor speak the non-English language spoken by a majority of children in a class or program. These requirements are not administrative formalities. They are the mechanism by which programs meet the Act's requirement that services be culturally and linguistically appropriate. Their removal also raises immediate safety concerns: without a shared language, staff cannot

reliably communicate with children about allergies, injuries, distress, or basic needs, nor can families reliably communicate with staff in an emergency. A qualifications framework that no longer accounts for the linguistic and cultural composition of the children in care is inconsistent with the statute and creates avoidable risk to children's safety and well-being.

HSC urges ACF to maintain the current staff qualification and competency requirements at § 1302.91, including the existing requirements that staff, consultants, and contractors demonstrate cultural familiarity with the families served and that programs ensure home-language capacity among classroom staff and home visitors.

Retain Standards that Promote Staff Health and Wellness. The Proposed Rule eliminates § 1302.93 in its entirety, removing the requirements that programs provide staff regular breaks of adequate length and frequency, make mental health and wellness information available to staff, and cultivate a program-wide culture of wellness. ACF's rationale is that these requirements are "overly prescriptive and unnecessary at the Federal level" and that programs "may choose to continue such practices where feasible."

This proposal cannot be evaluated in isolation. As discussed above in connection with the proposed changes to staff-to-child ratios and group size, Head Start's workforce is already experiencing high rates of burnout and turnover. Combined with enlarged group sizes and higher child-to-staff ratios, and the removal of coaching and professional development supports at § 1302.92, eliminating § 1302.93 increases the demands placed on staff while withdrawing the supports designed to help them meet those demands. This compounds, rather than mitigates, the burnout and turnover risk identified above, and leaves a workforce less able to provide the patient, individualized attention that children with behavioral and developmental needs require.

California programs report this dynamic already emerging. Staff and program leaders describe burnout eroding the quality of family engagement over time, as educators who once went beyond what was required disengage under accumulating pressure. Others point to the compounding effect of removing staff supports at the same time as removing behavioral and mental health supports for children, leaving staff with fewer tools and less capacity to serve the children who most need consistent, patient adult attention.

Finally, ACF's suggestion that programs may voluntarily continue these practices is not a substitute for the requirement. As elsewhere in the Proposed Rule, this flexibility is illusory without a funding guarantee. Programs facing flat budgets and new administrative cost constraints will have no additional resources to sustain a practice ACF no longer requires and no longer funds, whatever their own preferences.

HSC recommends that ACF retain § 1302.93 in its entirety.

Retain Existing Standards for Administrative Costs. The Head Start Act permits up to 15 percent of total program costs to be used for program development and administration, and separately authorizes the Secretary to require corrective action where administrative costs are excessive even within that limit (Sec. 644(b), (c)). The current regulation implements that statutory ceiling (§ 1303.5). The Proposed Rule would instead impose a flat 5 percent cap on development and administrative costs (proposed § 1301.14), a reduction of two-thirds from

current levels that is in tension with the Act's structure, under which the Secretary may require a grantee to reduce administrative costs below 15 percent only through an individualized determination that those costs are excessive — not through a categorical cap applied to all grantees regardless of circumstance.

A lower cap does not reduce administrative burden; it only reduces the resources available to carry it. The Performance Standards proposed for elimination throughout this NPRM are substantive expectations of program quality, not administrative red tape. Removing them does not eliminate the underlying administrative functions (human resources, fiscal management) and expenses (insurance, rent) that every grant recipient incurs regardless of which standards apply.

As discussed above, the cost drivers behind current administrative spending (minimum wage, insurance costs, rents) are unrelated to the Performance Standards and moving in the wrong direction for a 5 percent cap.

Recent ACF/OHS administrative actions have already increased, not decreased, the administrative burden on programs, including new "defend the spend" justification requirements for payments processed through the Payment Management System, processing delays in post-award applications that have required programs to overhaul and resubmit materials, and the elimination of roughly half of OHS staff previously available to answer programs' administrative questions. A 5 percent cap would require programs to meet this increased burden with dramatically fewer resources to do so.

Pending NPRMs would compound this effect. The recently proposed rule, Regulation for Federal Financial Assistance (document no. 2026-10817), would, if finalized as proposed, substantially increase the administrative workload associated with Head Start grants. Further, if enacted as proposed this NPRM would exacerbate the administrative burden by increasing turnover and eliminating a consolidated set of standards in favor of a patchwork of laws and regulations.

The impact of a 5 percent cap is not limited to small programs. While smaller grantees are most visibly at risk, many large programs also could not operate under a 5 percent cap given fixed administrative infrastructure needs. Larger grantees often have delegate grantees, which creates additional administrative burdens. The grantee turnover this would produce undermines the same consistency and continuity of service that the Proposed Rule's other changes threaten.

A 5 percent cap is also inconsistent with the cost-allocation framework programs already operate under. The Act sets the administrative ceiling at 15 percent, and OMB's Uniform Guidance separately permits recipients without a negotiated indirect cost rate to claim a de minimis rate of up to 15 percent of modified total direct costs (2 CFR § 200.414(f)). Because the Uniform Guidance requires costs to be applied consistently across an agency's funding sources, a 5 percent Head Start cap would effectively require programs to cap administrative costs at 5 percent system-wide, not just for Head Start funds — a constraint under which many programs would be unable to remain open.

The comparison programs cited in the preamble are not analogous. The preamble points to

CCDF, SAPT, MHBG, and CSBG as examples of programs operating with 5 percent administrative caps. But as the preamble itself acknowledges, those programs "support decentralized service delivery systems that rely on State, local, and subrecipient entities to administer benefits and oversee program operations." The 5 percent figure for these programs is the state's administrative overhead as the pass-through funder, not the administrative cost rate of the direct service provider actually delivering care. Head Start grant recipients are direct service providers, not pass-through administrators, and their administrative cost structure is not comparable to a state agency's.

Among California programs surveyed on this NPRM, none reported operating at or below a 5 percent administrative cost rate; 70 percent reported administrative costs between 11 and 15 percent, and the remainder between 5 and 10 percent. Respondents specifically identified rising insurance, benefits, and retirement contribution costs, small-program economies of scale, and reliance on indirect infrastructure (particularly among County Office of Education grantees) as reasons a 5 percent cap would be unworkable. Several respondents stated plainly that their programs would not survive at a 5 percent cap.

HSC recommends that the existing 15 percent statutory cap be retained without modification.

Clarify Basis for Open Competition. Proposed § 1301.16(i) would add a ninth, undefined basis for requiring a Head Start agency to compete for its next five years of funding: "any other measure as specified in the Head Start Act." Section 641A(c)(1) specifies a closed set of data sources the designation renewal system must integrate. The Act does not contemplate an open-ended condition beyond these specified measures, and ACF identifies no statutory provision that proposed § 1301.16(i) is meant to implement.

As drafted, the condition provides no ascertainable standard. Because the Head Start Act addresses virtually every dimension of program operation, a literal reading would allow ACF to require competition based on noncompliance with any statutory provision, however unrelated to the program quality and fiscal management criteria that the other eight conditions are designed to measure. This would substitute the specific, evidence-based framework Congress and current regulations have established for an unbounded standard subject to inconsistent application. This result is also in tension with the NPRM's stated purpose. ACF frames the proposed changes to § 1301.16 as reducing administrative burden and increasing predictability by focusing designation renewal on defined outcomes. An undefined ninth condition does the opposite: it introduces exactly the kind of open-ended discretion that undermines the predictability agencies need.

HSC requests that ACF clarify, with specificity, what statutory provisions proposed § 1301.16(i) is intended to reach, and why any such provisions are not already captured by the eight enumerated conditions. Absent such clarification, HSC opposes proposed § 1301.16(i) as impermissibly vague and inconsistent with the specific statutory and regulatory framework governing designation renewal, and requests that it be withdrawn from the final rule.

Conclusion

Head Start California thanks you again for the opportunity to comment on the notice of

Appendix A – Research

Barnett, Steven W., PhD. (2019). *“Relating Preschool Class Size to Classroom Quality and Student Achievement.”* National Institute for Early Education Research (NIEER).

Barnett, Steven W., PhD. (2017). *“Two-Way and Monolingual English Immersion in Preschool Education, An Experimental Comparison.”* National Institute for Early Education Research (NIEER). <https://nieer.org/research-library/two-way-monolingual-english-immersion-preschool-education>

Barr, A. & Gibbs, C. R. (2022). *“Breaking the Cycle? Intergenerational Effects of an Anti-Poverty Program in Early Childhood.”* Journal of Political Economy, 130(12), 3253–3285.

Bennhoff, F. H., García, J. L. & Leaf, D. E. (2024). *“The Dynastic Benefits of Early-Childhood Education.”* Journal of Human Capital, 18, 44–73.

Bloom, H. S. & Weiland, C. (2015). *“Quantifying Variation in Head Start Effects.”* MDRC Working Paper.

Brown, Scott R. & Shinn, Marybeth, & Khadduri, Jill. (2017). *“Well-being of Young Children after Experiencing homelessness.”* OPRE Report No. 2017-06. <https://homelesshub.ca/wp-content/uploads/2024/04/homefambrief.pdf>

Center on the Developing Child. (2004). *“Young Children Develop in an Environment of Relationships.”* Working Paper 1.

Comment Letter to U.S. Department of Health and Human Services, Administration for Children and Families, Office of Head Start from The Learning Policy Institute. (2026). Regarding: RIN 0970–AD30; Docket No. ACF–2026–0595, Reducing Federal Burden for Head Start Programs. https://learningpolicyinstitute.org/media/5053/download?inline&file=Head_Start_20260908_LETTER.pdf

Consensus Study Report. (2017). *“Promoting The Educational Success of Children and Youth Learning English: Promising Futures.”* National Academies Sciences Engineering and Medicines.

Daugherty, Rebecca. (2026). *“The Economic Necessity of Child Care Infrastructure, Explained.”* Bipartisan Policy Center.

Dr. Xigrid Soto-Boykin & Dr. Shantel Meek & Mario Cardona & Dr. Conor Williams. (2026). *“Preserving Access and Opportunity in Head Start for Dual Language Learners: A Review of the Science, Legislative Mandates, and Regulatory Requirements.”* Arizona State University, The Children’s Equity Project. <https://cep.asu.edu/resources/dual-language-learners-head-start>

Feller, A., Grindal, T., Miratrix, L. & Page, L. C. (2016). *“Compared to What?”* Annals of Applied Statistics, 10(3), 1245–1285.

Federal Register. (2026). Reducing Federal Burden for Head Start Programs.
<https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

Figueras-Daniel, Alexandra & Stephens, Christina. (2026). *“An English-Only Mandate for Head Start Will Harm Children.”* National Institute for Early Education Research (NIEER).

First Five Years Fund Poll: Support for Head Start 2025.
<https://www.ffyf.org/2025/04/29/new-poll-support-for-head-start/>

Fox, Erin G., MPA, MPH & Purtell, Kelly, PhD; & Lang, Sarah N., PhD. (2026). *“Exploring Potential Factors Driving High Turnover Among Early Care and Education Teachers.”* The Ohio State University Crane Center For Early Childhood Research and Policy.

Gardner, Madelyn, (2026). *“Proposed Head Start Changes Would Affect Children, Families, and Public Schools.”* Learning Policy Institute.
<https://learningpolicyinstitute.org/blog/proposed-head-start-changes-would-affect-children-families-and-public-schools>

Gelber, A. & Isen, A. (2013). *“Children’s Schooling and Parents’ Behavior.”* Journal of Public Economics, 101, 25–38.

Gibbs, C. R. (forthcoming). *“Early Learning across Decades: Advances in Measuring Head Start Effectiveness.”* Journal of Economic Literature. Working-paper version: NBER Working Paper 34812 (2026).

Grunewald, R., Nunn, R., & Palmer, V. (2022). *“Examining Teacher Turnover in Early Care and Education.”* Federal Reserve Bank of Minneapolis.
<https://www.minneapolisfed.org/article/2022/examining-teacher-turnover-in-early-care-and-education>

Head Start Program Facts: Fiscal Year 2024. U.S. Department of Health and Human Services.

Head Start Program Performance Standards. Sec. 641A Standards: Monitoring of Head Start Agencies and Programs. <https://headstart.gov/policy/head-start-act/sec-641a-standards-monitoring-head-start-agencies-programs>

Institute of Education Sciences. (2022). *“Dual Language Programs, Intervention Report, English Language Arts Topic Area.”* WC 2023-001 U.S. Department of Education.
https://ies.ed.gov/ncee/WWC/Docs/InterventionReports/WWC_DLP_IR-Report.pdf

Kamenetz, Anya. (2025). *“Head Start is turning 60. The Federal Child Care Program May Not Make it to 61.”* The Hechinger Report.

Kline, P. & Walters, C. R. (2016). *“Evaluating Public Programs with Close Substitutes.”* Quarterly Journal of Economics, 131(4), 1795–1848.

Korsen, Dana and Blatt, Joshua (2017). “*Promoting the Educational Success of Children and Youth Learning English - New Report.*” National Academies Sciences Engineering and Medicines Division of Behavioral and Social Sciences and Education and Health and Medicine Division Committee on Fostering School Success for English Learners: Toward New Directions in Policy, Practice, and Research.
<https://www.nationalacademies.org/news/promoting-the-educational-success-of-children-and-youth-learning-english-new-report>

Kraft, M. A. (2020). “*Interpreting Effect Sizes of Education Interventions.*” Educational Researcher, 49(4), 241–253.

Lara-Alecio, R., Galloway, M., Mason, B., Irby, B. J., & Brown, G. (2004). “*Texas Dual Language Program Cost Analysis.*” Texas A&M University.

LENA Team. (2024). “*Dual Language Learners Experience Less Teacher-Child Interactions in Child Care and Preschool: New Data Analysis.*” Blog Posts.
<https://www.lena.org/resources/blog-posts/dual-language-learners-in-child-care/>

Marino, Madison Doan & Jonathan Butcher. (2026). “*From Washington, DC, to the States: Rethinking Head Start.*” Heritage Foundation.
<https://nepc.colorado.edu/review/head-start>

Markowitz, A. J. (2024). “*Within-year Teacher Turnover in Head Start and Children's School Readiness.*” AERA Open, 10. <https://doi.org/10.1177/23328584241245094>

McLean, C., Austin, L. J. E., Powell, A., Jaggi, S., Kim, Y., Knight, J., Muñoz, S., & Schlieber, M. (2024). “*Early Childhood Workforce Index – 2024.*” Center for the Study of Child Care Employment, University of California, Berkeley. <https://cscce.berkeley.edu/workforce-index-2024/>

Model Work Standards

<https://cscce.berkeley.edu/publications/report/creating-better-child-care-jobs-model-work-standards/>

Muruvi, W., Powell, A., Kim, Y., Copeman Petig, A., & Austin, L. J. E. (2023). “*The emotional and physical well-being of early educators in California.*” Center for the Study of Child Care Employment, University of California, Berkeley.
<https://cscce.berkeley.edu/publications/report/ca-emotional-physical-wellbeing-2023>

Neidell, M. & Waldfogel, J. (2010). “*Cognitive and Noncognitive Peer Effects in Early Education.*” Review of Economics and Statistics, 92, 562–576.

Office of Head Start - Services Snapshot. National All Programs (2024-2025).
[https://headstart.gov/sites/default/files/PIR%20Links/All%20Programs%20\(2024-2025\).pdf](https://headstart.gov/sites/default/files/PIR%20Links/All%20Programs%20(2024-2025).pdf)

OPRE Report. (2016 revised 2018). “*Early Care and Education Usage and Households’ Out-of-Pocket Costs: Tabulations from the National Survey of Early Care and Education (NSECE).*” OPRE Report #2016-09.

OPRE Report. (2024). *“Parental Search and Selection of Child Care and Early Education: A Literature Review.”* OPRE Report #2024-082.

Parrish, T. B. (1994). *“A cost analysis of alternative instructional models for limited English proficient students in California.”* Journal of Education Finance, 19, 256–278.

Pufall Jones, E., Knight, J., Dyer, S., & Copeman Petig, A. (2026). *“Working conditions for early educators in San Francisco: Findings from the 2025 SEQUAL survey.”* Center for the Study of Child Care Employment, University of California, Berkeley.

<https://cscce.berkeley.edu/publications/report/seqqual-early-educator-voices-in-sf/>

Sabol, T. J. & Chase-Lansdale, P. L. (2015). *“Head Start and Parents’ Education and Employment.”* JPAM, 34, 136–161.

Schachner, Abby & Yun, Cathy & Melnick, Hanna & Barajas, Jessica. (2024). *“Coaching at Scale: A Strategy for Strengthening the Early Learning Workforce.”* Learning Policy Institute.

Schlieber, M., Copeman Petig, A., Valencia López, E., & Pufall Jones, E. (2023). *“Early educator voices in Florida: Flagler and Volusia Counties. Work environment conditions that impact early educator practice and program quality.”* Center for the Study of Child Care Employment, University of California, Berkeley.

<https://cscce.berkeley.edu/publications/report/early-educator-voices-in-florida-counties/>

Schlieber, M., Knight, J., Adejumo, T., Copeman Petig, A., Valencia López, E., & Pufall Jones, E. (2023). *“Early educator voices: Oregon. Center for the Study of Child Care Employment.”* University of California, Berkeley.

<https://cscce.berkeley.edu/publications/report/educator-voices-oregon/>

SchoolHouse Connection. (2026). Infant and Toddler Homelessness Report.

<https://schoolhouseconnection.org/article/infant-and-toddler-homelessness>

Steele, J. L., Slater, R. O., Li, J., Zamarro, G., Miller, T., & Bacon, M. (2018). *“Dual-language immersion education at scale: An analysis of program costs, mechanisms, and moderators.”* Educational Evaluation and Policy Analysis, 40(3), 420–445.

The Happy Teacher Project at the University of Oklahoma collects data with Head Start programs and has documented health consequences of educators going without breaks, including higher rates of urinary tract infections.

<https://www.ou.edu/education/happyteacherproject>

Von Hippel, P., Chor, E. & Lurie, L. (2025). *“Is Head Start Worth Saving?”* Education Next, Summer 2025.

Wikle, J. & Wilson, R. (2023). *“Access to Head Start and Maternal Labor Supply.”* Journal of Labor Economics, 41(4), 1081–1127.

Whitebook, M., Howes, C., & Phillips, D. (1990). *“Who cares? Child care teachers and the*

quality of care in America. Final report, National Child Care Staffing Study.” Child Care Employee Project.

Whitebook, M., Phillips, D., & Howes, C. (1993). “*The National Child Care Staffing Study revisited: Four years in the life of center-based child care.*” Center for the Child Care Workforce.

Whitebook, M., Howes, C., & Phillips, D. (1998). “*Worthy work, unlivable wages: The National Child Care Staffing Study, 1988–1997.*” Center for the Child Care Workforce.

Whitebook, M., Phillips, D., & Howes, C. (2014). “*Worthy work, STILL unlivable wages: The early childhood workforce 25 years after the National Child Care Staffing Study.*” Center for the Study of Child Care Employment, University of California, Berkeley.
<https://cscce.berkeley.edu/publications/report/worthy-work-still-unlivable-wages/>

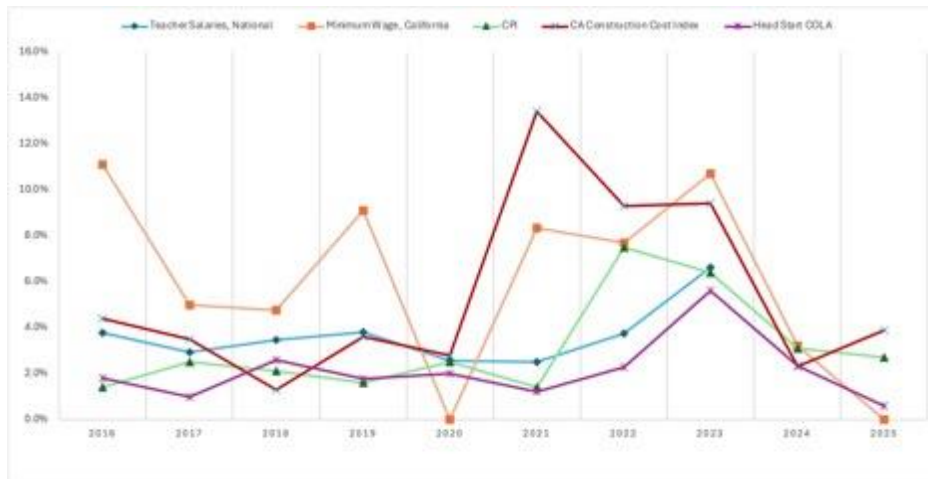
U.S. Department of Education and U.S. Department of Health and Human Services Guidance on the Head Start Program Performance Standards Required Under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act. (2024). Report: “*Supporting High-Quality Preschool with Title I Funds: Guidance to Local Educational Agencies and Schools on Implementing the Required Head Start Program Performance Standards for Title I-Funded Preschool Programs*”

Winsler, Adam & Rozell, Nadine & Tucker, Tevis L. & Norvell, Gabriele. (2023). “*Earlier mastery of English predicts 5th Grade academic outcomes for low income dual language learners in Miami, USA.*” Bilingualism: Language and Cognition 26, 910–923.
https://www.cambridge.org/core/services/aop-cambridge-core/content/view/7D43DAE4690AA1DB81DB45B24A0B4574/S136672892300007Xa.pdf/earlier_mastery_of_english_predicts_5th_grade_academic_outcomes_for_lowincome_dual_language_learners_in_miami_usa.pdf

Appendix B – Cost Increase Data

Head Start Cost Pressures

*% Increase in major Head Start program costs versus increase in Head Start Funding, 2016 - 2025**



*Minimum wage shown is the base state minimum wage, not inclusive of higher fast food and healthcare minimum wages.

Annual Increase in Major Costs

Year	CA Minimum Wage	CA Construction Cost Index	CPI	Head Start COLA
2016	11.1%	4.40%	1.40%	1.8%
2017	5.0%	3.5%	2.50%	1.0%
2018	4.8%	1.3%	2.10%	2.6%
2019	9.1%	3.6%	1.60%	1.8%
2020	0.0%	2.8%	2.50%	2.0%
2021	8.3%	13.4%	1.40%	1.2%
2022	7.7%	9.3%	7.50%	2.3%
2023	10.7%	9.4%	6.40%	5.6%
2024	3.2%	2.3%	3.10%	2.4%
2025	3.1%	3.9%	0.027	0.6%

Sources

Minimum Wage: <https://fred.stlouisfed.org/series/STTMINWGCA>

CA Construction Cost Index: <https://www.dgs.ca.gov/RES/RESOURCES/Page-Content/Real-Estate-Services-Division-Resources-List-Folder/DGS-California-Construction-Cost-Index-CCC>

CPI:

https://www.bls.gov/regions/mid-atlantic/data/consumerpriceindexhistorical_us_table.htm