## PUBLIC COMMENT LETTER

**TO:** To Whom It May Concern
**RE:** Comments on Reducing Federal Burden for Head Start Programs
(ACF-2026-0595, RIN 0970-AD30)
**FROM:** Arlington Community Foundation (ACF), Arlington, VA
**DATE:** 9/25/26

Since 2019, the Arlington Community Foundation has focused on helping extremely low-income families (those making 30% or less of Arlington's Area Median Income) increase their access to affordable childcare. Arlington County's average cost for childcare is among the highest in the nation.

These families often begin their childcare experience with Early Head Start or Head Start. As such, the proposed Notice of Proposed Rulemaking (NPRM) regarding these two programs is of deep concern to us.

We believe that certain aspects of Head Start are fundamental to the program and should remain in place—protections and standards that define what children and families are guaranteed across the nation, and where federal statute and regulations have worked in concert for years.

Therefore, we urge you to:

- **Maintain the federally mandated group-size and staff-child ratios.** These are essential to ensuring that children from extremely low-income families across the nation experience high-quality settings.
- **Allow second-language support for young children who are still acquiring English.** The Head Start Act includes a definition of "limited English proficient": a child whose difficulty with English may be sufficient to deny them the ability to successfully achieve in a classroom in which the language of instruction is English.
- **Maintain the Administrative Cost Cap of up to 15%.** Moving to 5% would establish a vastly different standard from that applied to other federal grantees, where OMB allows nonprofits to claim 15%. Childcare operates on very thin margins; a 5% limit will not necessarily free up dollars for the classroom.
- **Make no changes to protections for children experiencing homelessness.**
- **Continue specific federal disability services and discipline protections for students with disabilities.**
- **Continue specific federal comprehensive health, mental health, and family support services.**

In sum, affordable childcare funding and availability need to expand—but not by shifting costs to providers or by weakening group-size standards, staff-child ratios, or the educational preparation of those who provide care for young children across the country.

Thank you for considering these comments.