



Our mission is to coalesce, inspire, and support the Head Start field as a leader in early childhood development and education.

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December 15, 2021

The Honorable Xavier Becerra  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

**RE: Head Start Vaccine and Masking Rule (Docket No. ACF-2021-0003)**

Dear Secretary Becerra:

Working in concert with regional and state Head Start associations nationwide, the National Head Start Association (NHSA) is preparing detailed comments regarding the Interim Final Rule that will add new provisions to the Head Start Program Performance Standards to mitigate the spread of COVID-19. Even before the pandemic's unfortunate toll, we have shared a common goal with HHS—a strong commitment to child and family health and safety—which is why Head Start has been a leader in teaching basic hygiene; performing medical and dental screenings; helping parents end chemical dependencies; and supporting children with physical disabilities.

While we are completing our formal comments, and while we continue our shared commitment to the health and safety of children and families, we are compelled to share with you directly the results of our field survey and extensive engagement. The results indicate the potential devastating effects the new rule on vaccines and masking will have on the children and families we serve.

As you know, Head Start's strength has come from the flexibility of local practices that enables programs to meet community and family needs. We must move forward in a way that maintains this proven precedent. The approach outlined in the rule does not accurately reflect the diversity of local situations encountered by Head Start in communities across the country. In fact, the Centers for Disease Control and Prevention (CDC) understands the need for and benefits from flexibility in Head Start classrooms in dealing with COVID-19. According to a December 11, 2020, CDC [Morbidity and Mortality Weekly Report](#):

*"Head Start and Early Head Start programs successfully implemented CDC-recommended mitigation strategies and applied other innovative approaches to limit SARS-CoV-2 transmission among children, teachers, and other staff members by allowing maximum program flexibility..."*

NHSA surveyed Head Start grantees to understand the potential impact of the new rule on their ability to staff centers and serve the children, families, and communities that depend on them. The results (attached) are troubling. If accurate, the new rule could lead to Head Start programs losing between 46,614 and 72,422 staff, or 18% to 26% of all staff. This could result in the closing of over 1,300 Head Start classrooms.

On December 10, 2021, NHSA also hosted a webinar with over 520 grantees and program administrators. The comments shared by participants were heartbreaking and difficult to address. Vital elements of the Head Start model—developmentally appropriate educational experiences, qualified and dedicated staff who have the children's best interest at heart, and the opportunity for parents to be involved in their child's education—will not be available for the children if classrooms are unable to operate because of the imposition of the new rule.



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For example, programs in several localities are already wrestling with how to comply with differing and conflicting state and federal mandates. In the turmoil, Head Start programs are losing valuable collaboration agreements with school districts. In situations like these, it is the children who suffer. One director told us that they stand to drop 75% of their Head Start slots due to school districts refusing to require the vaccine. We heard the same thing from another program in a different state where 80% of the slots are school partner slots, which would have to stop immediately once the vaccine mandate goes into effect.

Similarly, many programs depend on the school districts for busing. Because transportation personnel appear to be the least vaccinated group, many programs are at risk of closing because the children they serve will lose the transportation on which they rely to get to and from their program.

Again, the health and safety of children, families, staff, and communities is our top priority. The qualified and dedicated staff who have their children's best interest at heart, and the opportunity for parents to be involved in their child's education, all benefit from the strength of Head Start's local flexibility. We strongly urge you to consider this fact in making critical modifications to this new rule and allowing for that important local flexibility. As the CDC has stated, that flexibility works.

Thank you for your consideration and your prompt action. We stand ready to work with you to ensure Head Start can continue to be the lifeline to success in school and in life for generations to come.

Sincerely,

Yasmina Vinci  
Executive Director  
National Head Start Association

cc: The Honorable Nancy Pelosi  
The Honorable Steny Hoyer  
The Honorable Charles Schumer  
The Honorable Kevin McCarthy  
The Honorable Mitch McConnell  
The Honorable Patty Murray  
The Honorable Richard Burr  
The Honorable Robert C. "Bobby" Scott  
The Honorable Virginia Foxx  
Cedric Richmond, Director, White House Office of Public Engagement  
Carmel Martin, Deputy Director for Economic Mobility, Domestic Policy Council  
Katie Hamm, Deputy Assistant Secretary for Early Childhood Development,  
Administration for Children and Families  
Shawna Pinckney, Director, Grants Division, Administration for Children and Families  
Colleen Rathgeb, Director of Policy and Planning, Office of Head Start