



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

July 29, 2022

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

Dear Secretary Becerra:

The Head Start Interim Final Rule with Comments (IFC) regarding COVID-19 vaccines and masking went into full effect six months ago, on January 31, 2022, nearly five months before a vaccine was available for children ages six months to five years. While well-intentioned, the rule has been and continues to be extremely disruptive to the Head Start community. As grant recipients prepare to reopen for the 2022-2023 school year, we write today to urge the Administration to provide a final rule before the beginning of the school year—no later than August 15, 2022.

Far before and since the announcement of the IFC, the Head Start community has repeatedly acknowledged the critical role of vaccines and masking in reducing the spread of COVID-19. While we continue to navigate the uncertainty of how COVID-19 and its many variants impact our communities, it is critical to recognize that much has changed in our nation's response to the pandemic. Most notably, children under the age of five are now able to safely access a vaccine. Undoubtedly, the vaccine for children six months to five years old is another tool to keep our children healthy and safe. That said, the IFC's continuing uncertainty is causing potentially irreparable damage to Head Start programs. Longtime employees have left programs. Parents have removed their children or not enrolled them in the first place. Likewise, as we have noted in previous communications, countless local partnerships, which have taken decades to build, have been damaged due to a lack of trust from the Administration that local communities know what's best for their children and families.

Adding to the confusion and uncertainty is the ongoing court action regarding the IFC, which has bifurcated the nationwide Head Start community. Twenty-five states have been told by the courts that they do not need to abide by the IFC. Further, the Centers for Disease Control and Prevention has repeatedly changed the federal guidance on vaccines and masking, rendering the IFC out of alignment with the CDC. A final rule is needed and it cannot come soon enough.

As we prepare for the new school year, we hope a final rule that restores the traditional role of local program autonomy will be issued in line with the comments we submitted on December 23, 2021. This is imperative in order for programs to rebuild relationships both with community partners as well as parents.

The health and safety of Head Start children, families, staff, and communities continues to remain our top priority. Yet with the start of the program year just a month away, the state of limbo regarding the IFC is hindering programs' recruitment and enrollment for staff and families. Without a final rule before the start of the school year, thousands of children will lose access to life-changing Head Start services and Head Start recipients will continue spending far too much of their time and energy interpreting and managing the impact of the IFC rather than trying to figure out how to meet the needs of children and families in their communities.

Thank you for your consideration and prompt action. We stand ready to work with you.



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Sincerely,

National Head Start Association
National Indian Head Start Directors Association

Alabama Head Start Association
Alaska Head Start Association
Arkansas Head Start Association
Head Start California
Colorado Head Start Association
Connecticut Head Start Association
Delaware Head Start Association
Florida Head Start Association
Georgia Head Start Association
Head Start Association of Hawaii
Idaho Head Start Association
Illinois Head Start Association
Indiana Head Start Association
Iowa Head Start Association
Kansas Head Start Association
Kentucky Head Start Association
Louisiana Head Start Association
Maine Head Start Directors Association
Massachusetts Head Start Association
Michigan Head Start Association
Minnesota Head Start Association
Missouri Head Start Association
Montana Head Start Association
Nebraska Head Start Association

New Jersey Head Start Association
New Mexico Head Start Association
New York State Head Start Association
Ohio Head Start Association, Inc.
Oklahoma Head Start Association
Oregon Head Start Association
Pennsylvania Head Start Association
Rhode Island Head Start Association
South Dakota Head Start Association
South Carolina State Head Start Association
Tennessee Head Start Association
Virginia Head Start Association
West Virginia Head Start Association, Inc.
Wisconsin Head Start Association
Wyoming Head Start Association

New England Head Start Association
Region V Head Start Association
Region VI Head Start Association
Region VII Head Start Association
Region VIII Head Start Association
Region IX Head Start Association
Region X Head Start Association

cc: The White House
The Honorable Patty Murray
The Honorable Richard Burr
The Honorable Bobby Scott
The Honorable Virginia Foxx