

**RESOLUTION OPPOSING PROPOSED FEDERAL CHANGES TO THE HEAD START PROGRAM
PERFORMANCE STANDARDS AND AFFIRMING SUPPORT FOR COMPREHENSIVE SERVICES FOR
CHILDREN AND FAMILIES**

**SANTA CLARA COUNTY BOARD OF EDUCATION
RESOLUTION No. 2692-4**

WHEREAS, the Santa Clara County Board of Education (SCCBOE) serves as the governing body and grantee for Head Start and Early Head Start programs operated by the Santa Clara County Office of Education (SCCOE); and

WHEREAS, the United States Department of Health and Human Services, through the Office of Head Start, has issued a Notice of Proposed Rulemaking entitled “[Reducing Federal Burden for Head Start Programs](#),” which would rescind and replace the current Head Start Program Performance Standards; and

WHEREAS, Head Start and Early Head Start have served as a cornerstone of the nation’s early childhood system for more than 60 years, providing comprehensive educational, health, nutrition, developmental, family engagement, and support services to children and families experiencing poverty; and

WHEREAS, the SCCOE administers Head Start and Early Head Start services that support children and families throughout Santa Clara County, including dual-language learners, children with disabilities, children experiencing homelessness, and other populations with significant needs; and

WHEREAS, the proposed rule would eliminate substantial portions of the existing Head Start Program Performance Standards and replace them with a significantly reduced regulatory framework; and

WHEREAS, the proposed rule would require instruction to be conducted in English, except in limited circumstances, replacing current regulations that recognize the importance of supporting both English acquisition and home language development for dual-language learners; and

WHEREAS, an English-only instructional requirement may undermine educational opportunities for dual-language learners, limit family engagement, reduce the effectiveness of home-based services delivered in partnership with parents, and create barriers to meaningful participation by families with limited English proficiency; and

WHEREAS, the [Regulatory Impact Analysis](#) accompanying the proposed rule acknowledges significant implementation costs associated with English-only instruction but does not provide a comparable analysis of potential educational impacts on multilingual children, family engagement, or school readiness outcomes; and

WHEREAS, children experiencing homelessness are among the populations specifically prioritized by Congress in the [Head Start Act](#) and often face substantial barriers to enrollment, documentation, and continuity of services; and

WHEREAS, proposed changes to eligibility and enrollment practices, including limiting families' ability to self-attest in circumstances where documentation may be difficult to obtain, could create new barriers to enrollment for children experiencing homelessness and conflict with the longstanding congressional intent to prioritize access for this vulnerable population; and

WHEREAS, Head Start programs often serve as the first point of connection between families and special education services, healthcare providers, and intervention services and so play a critical role in identifying developmental delays and disabilities through early screening, assessment, referral, and family support services; and

WHEREAS, the proposed rule would remove numerous existing regulatory requirements related to developmental screening, referral, family engagement, disability services, and coordination of supports for children with disabilities; and

WHEREAS, the removal of these safeguards may weaken systems that support early identification of developmental delays and disabilities, potentially resulting in delayed identification and intervention which would result in poorer educational outcomes for children and families; and

WHEREAS, if existing regulatory requirements around identification and intervention are removed, children with disabilities and children exhibiting developmental, behavioral, or social-emotional needs may not be identified and therefore may not be able to benefit from existing regulations that protect children with special needs from suspension and expulsion except in narrowly defined circumstances and only after intensive intervention and support efforts have been exhausted; and

WHEREAS, the [Regulatory Impact Analysis](#) supporting the proposed rule places significant emphasis on projected fiscal savings resulting from reduced staffing, reduced service intensity, reduced instructional duration, and reduced administrative expenditures, but provides comparatively limited analysis of potential impacts on children, families, local communities, and public systems; and

WHEREAS, reductions in educational services, developmental supports, parent engagement, and family services should not be characterized solely as efficiency gains without full consideration of their effects on children's development, school readiness, and long-term success; and

WHEREAS, preserving access to high-quality early learning opportunities and comprehensive services remains essential to advancing educational equity and improving outcomes for children furthest from opportunity; now

THEREFORE, BE IT RESOLVED, that the Santa Clara County Board of Education expresses its opposition to the proposed changes contained in the [Notice of Proposed Rulemaking entitled "Reducing Federal Burden for Head Start Programs"](#); and

BE IT FURTHER RESOLVED, that the County Board of Education urges the United States Department of Health and Human Services to withdraw or substantially revise the proposed rule and to preserve the existing protections, supports, and comprehensive services that have long defined Head Start; and

BE IT FURTHER RESOLVED, that the Board directs the County Superintendent of Schools and appropriate staff to:

1. Submit public comments in response to the Notice of Proposed Rulemaking reflecting the concerns identified in this resolution; and
2. Engage with other county offices of education, early childhood organizations, advocacy groups, Santa Clara County's congressional delegation and other stakeholders regarding the proposed rule; and
3. Inform the Board of further developments related to the proposed changes; and
4. Continue advocating for policies that support comprehensive, inclusive, and equitable services for young children and families.

PASSED AND ADOPTED by the County Board of Education at a meeting held on October 7, 2026, by the following vote:

AYES: Raeena Lari, Maimona Afzal Berta, Don Rocha, Victoria Chon, Jessica Speiser, Jorge Pacheco

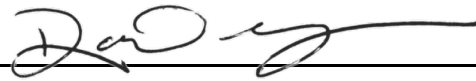
NOES: None

ABSTAIN: None

ABSENT: Tara Sreekrishnan



Victoria Chon, President
Santa Clara County Board of Education



Dr. David M. Toston, Sr.
County Superintendent of Schools