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Department of Health and Human Services

200 Independence Avenue, S.W.

Washington, D.C. 20201

**Re: Reducing Federal Burden for Head Start Programs, Docket Number
ACF-2026-0595, RIN Number 0970-AD30**

Introduction

The National Network for Youth (NN4Y) submits this comment in response to the Administration for Children and Families' (ACF) Notice of Proposed Rulemaking (Notice) for Head Start programs.

Founded in 1974, NN4Y is a national nonprofit organization representing over 300 youth homelessness service providers and young people across the country. Our members operate outreach programs, shelters, transitional and permanent housing programs, host homes, affordable housing, Head Start, and homelessness prevention initiatives in urban, suburban, rural, and tribal communities nationwide. These programs serve children, youth, and young parent families up to age 25.

Background

Every year, 4.2 million youth, young adults, and young parent families up to age 25 experience homelessness in America.¹ Preventing and ending homelessness as early in a person's life as possible is necessary to prevent chronic homelessness and reduce taxpayer burden. Cities across the country that have conducted surveys of their chronically homeless adult population consistently find that 25 percent first experienced homelessness before the age of 18.^{2,3,4} Knowing this, it becomes clear that housing and support services that target young people aged 25 and under are necessary to prevent and reduce chronic adult homelessness.

¹ Morton, M. H., Samuels, G. M., Dworsky, A., & Patel, S. (2018). *Missed opportunities: LGBTQ youth homelessness in America*. Chapin Hall at the University of Chicago. <https://www.chapinhall.org/wp-content/uploads/VoYC-LGBTQ-Brief-FINAL.pdf>.

² Economic Roundtable. (2018). *Escape Routes: MetaAnalysis of Homelessness in LA*. <https://economicrt.org/publication/escape-routes>.

³ All Home. (2020). *Count Us In: Seattle/King County Point-in-Time Count of Individuals Experiencing Homelessness*. https://kcrha.org/wp-content/uploads/2022/05/CountUs-In-2020-Final_7.29.2020-1.pdf.

⁴ Wilder Research. (2023). *2023 Minnesota Homeless Study* [question 36]. https://mnhomeless.org/wp-content/uploads/2026/03/StatewideMN_Adult2023_Tables18-38.pdf

Further highlighting the urgency of the issue is the high number of youth experiencing homelessness who are parents to young children.

- Nearly 44 percent of youth ages 18 to 25 who experience homelessness are parents, and approximately 18 percent of youth ages 13 to 17 are pregnant or parenting.⁵
- Counts by the U.S. Department of Housing and Urban Development (HUD) found that, in 2024, the greatest increase in homelessness of any subpopulation were families with children—a 39.4 percent increase from 2023.⁶ HUD’s 2023 count showed a 17 percent increase in family homelessness from 2022.⁷
- An estimated 1.1 million children have a young parent under 25 who experienced homelessness in the past year.⁸
- Over 500,000 infants and toddlers ages birth through three experienced homelessness between 2023 to 2024.⁹

The children of youth experiencing homelessness are primarily infants and toddlers—in fact, babies are more likely to experience homelessness than any other age group.¹⁰ A child’s early years are foundational for brain development, emotional regulation, and attachment formation. Homelessness during this sensitive period puts young children at significant risk for developmental delays, health complications, and long-term social-emotional harm.¹¹

Children and young families experiencing homelessness are one of the most vulnerable populations in our nation. It is absolutely critical that their particular needs are recognized and accommodated to prevent the debilitating and expensive long-term outcomes that early homelessness can create, including chronic homelessness, human trafficking, severe health and mental health issues, and economic instability.

⁵ Morton, M.H., Dworsky, A., & Samuels, G.M. (2017). Missed Opportunities: Pregnant and Parenting Youth Experiencing Homelessness in America. Chapin Hall at the University of Chicago.

<https://www.chapinhall.org/wp-content/uploads/VoYC-PP-Brief-FINAL.pdf>

⁶ U.S. Department of Housing and Urban Development. (2024). The 2024 Annual Homelessness Assessment Report (AHAR) to Congress. <https://www.huduser.gov/portal/sites/default/files/pdf/2024-AHAR-Part-1.pdf>.

⁷ U.S. Department of Housing and Urban Development. (2024). The 2023 Annual Homelessness Assessment Report (AHAR) to Congress. <https://www.huduser.gov/portal/sites/default/files/pdf/2023-AHAR-Part-1.pdf>.

⁸ Morton, M.H., Dworsky, A., & Samuels, G.M. (2017). Missed Opportunities: Pregnant and Parenting Youth Experiencing Homelessness in America. Chapin Hall at the University of Chicago.

<https://www.chapinhall.org/wp-content/uploads/VoYC-PP-Brief-FINAL.pdf>

⁹ SchoolHouse Connection. (2026). Infant & Toddler Homelessness Across 50 States: 2023-2024.

<https://e1.nmcdn.io/assets/schoolhouse/wp-content/uploads/2026/09/2026-Infant-Toddler-Homelessness-Report.pdf>.

¹⁰ Shaw S. (2019). Current Data on Infants and Toddlers Experiencing Homelessness. *Zero to Three*, 39(4), 11–19.

¹¹ American Psychology Association. (2025). Children, Youth, Families and Socioeconomic Status.

<https://www.apa.org/pi/ses/resources/publications/children-families>.

One of the ways our federal government has done this is through removing barriers to access for Head Start programs for children and families experiencing homelessness. Head Start is not “just” child care—it is a necessary resource for young parents working to overcome homelessness and economic instability, including by:

- Allowing parents to pursue education and employment.
- Supporting child nutrition via three meals and two snacks per day.
- Offering critical health screenings and linkages to early intervention services for disabilities or developmental delays. This is especially important because children experiencing homelessness have higher rates of disabilities and developmental delays when compared to other children living in poverty.
- Offering parent-to-parent peer support and education.
- Empowering parents to act as their child’s first and best teacher and decision-maker through a parent governance model.

A young mom who was experiencing homelessness with her baby did not know her infant was not engaging in an age-appropriate way. As a young mom, she didn't know the important warning signs until the Maternity Group Home she was living at and the Early Head Start her child attended became involved. Early Head Start was able to connect the baby to appropriate medical care and supportive services, and while he continues to have some delays he is now getting the support and care that he needs. He has made greater progress during his time in the program than was originally thought possible, and is even walking now.

— Youth Homelessness Provider and Head Start Program in Missouri

ACF’s rescission of the regulatory policies and procedures that uphold Head Start’s statutory requirement to identify, prioritize, and support children and families experiencing homelessness will severely undermine these families’ ability to achieve stability, communities’ ability to protect and serve them, and our nation’s ability to prevent and end homelessness.

We strongly recommend ACF retain the following provisions in its final rule: 1305.2, 1302.11(b)(2)(i)(C), 1302.12(c)(1)(iii) and (i)(3), 1302.13, 1302.14(a)(1), 1302.15(b)(3), 1302.15(c), 1302.15(e), 1302.16(c)(1), 1302.16(c)(2), 1302.53(a)(2)(vi), and 1302.72(a).

Statutory Requirement

Section 641A(a)(2) requires the Secretary, in modifying the standards, to consult with experts and to consider research-based practices for homeless children and changes in their number.

Section 640(m) of the Head Start Act directs the Secretary to issue rules establishing policies and procedures to remove barriers to the enrollment and participation of homeless children. It requires those rules to ensure that homeless children are identified and prioritized, that they can enroll and attend while documents are obtained, and that programs coordinate with McKinney-Vento liaisons. The proposed rule removes the twelve regulations that carry out Section 640(m), replaces them with a reference back to the statute at proposed § 1301.02(g), and does not explain how the Secretary considered the requirements of Section 641A(a)(2) with respect to these children. Given this, we highly recommend against removing regulations as per this Notice, particularly those impacting children and families experiencing homelessness.

Removing Barriers to Enrollment

We don't want to turn down a family in crisis (transient, fleeing violence, escaping trafficking, etc.) because they don't have documentation from a shelter or agency confirming that they are homeless.

– Head Start Program in Missouri

Families experiencing homelessness need flexible pathways to establish eligibility and enroll their children in Head Start. The Head Start Act requires programs to allow families experiencing homelessness to apply, enroll, and attend while they obtain required documents within a reasonable timeframe. Current regulations support this requirement by allowing programs to accept a range of documentation to verify homelessness, including a signed family declaration when other documentation is unavailable. They also allow children experiencing homelessness to attend for up to 90 days while families obtain medical and other records and provide an exception to state immunization enrollment requirements. The proposed rule would remove these regulatory protections, including the flexible verification options and signed-declaration pathway, while also removing the specific regulatory protections that allow children to begin attending without required records. These changes could turn the loss of housing, and the loss of documents that often comes with it, into a barrier to Head Start enrollment. Families fleeing domestic violence, moving frequently, or staying in temporary arrangements may have no shelter letter, agency record, birth certificate, or immunization records readily available. Requiring documentation before a child can enroll or attend risks delaying access to early learning and may cause highly mobile families to lose contact with a program before they can complete the process.

Identifying and Prioritizing Children and Families Experiencing Homelessness

Head Start programs need clear requirements to identify and prioritize children experiencing homelessness. The Head Start Act requires the Secretary to implement policies and procedures to ensure that children experiencing homelessness are identified and prioritized for enrollment. Current regulations do this by requiring programs to actively recruit children experiencing homelessness, consider homelessness in enrollment decisions, and, when appropriate, reserve a limited number of enrollment slots for these children. The proposed rule would remove these requirements without replacing them, leaving programs with no regulatory obligation to actively identify or prioritize children experiencing homelessness. This is especially concerning because homelessness is often hidden, and families in crisis may not know about Head Start or have the time or ability to navigate a waiting list. Furthermore, the Secretary still has a statutory obligation to issue policies and procedures for Head Start programs to carry out this requirement.

Attendance and Continuity

Important flexibilities are needed to help children experiencing homelessness maintain access to Head Start when their families move. Current regulations require programs to make efforts to maintain a child's enrollment when a family moves to a different service area or, when appropriate, help transition the child to another Head Start program based on the family's needs. The proposed rule would remove these protections without providing a replacement for children experiencing homelessness who move during the program year. This creates a significant risk of disruption for children and families already experiencing instability: a family that moves across a service area or state line could lose its child's Head Start placement and have to start over in a new community, potentially facing a new waiting list at a time when stability and continuity are especially important.

Conclusion

Head Start is critical to children and families experiencing homelessness. NN4Y's members rely on strong partnerships with Head Start programs to help young families access early childhood education, stabilize their housing, pursue employment and education, and connect to other essential services. The regulatory protections discussed above are not administrative burdens, they are important tools that help ensure children experiencing homelessness can actually access and remain connected to Head Start. Removing them would create additional barriers for families already navigating significant instability and would undermine the Head Start Act's specific statutory protections for children experiencing homelessness. We urge ACF to retain these provisions and ensure that Head Start programs have clear, enforceable requirements and meaningful flexibilities to identify, enroll, prioritize, and serve children and families experiencing homelessness.