



Autism Society of America
6110 Executive Blvd, Suite 305
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October 6, 2026

Submitted Electronically at: <http://www.regulations.gov>

Office of Head Start
Attention: Director of Policy and Planning
330 C Street SW, 4th Floor
Washington, DC 20201

Re: Comments on the Department of Health and Human Service's Proposed Rule on Reducing Federal Burden for Head Start Programs, ACF-2026-0595/RIN number 0970-AD30.

The Autism Society of America appreciates the opportunity to submit comments on the U.S. Department of Health and Human Services' proposed rule, Reducing Federal Burden for Head Start Programs (RIN 0970-AD30).

Founded in 1965, the Autism Society of America is the nation's oldest and one of the largest grassroots Autism organizations. Through a nationwide network of more than 70 affiliates, the Autism Society works to create connections, empower individuals, and support families affected by Autism across the lifespan. Our policy work focuses on ensuring that Autistic people and their families have access to the health care, education, community-based services, and civil rights protections they need to thrive.

The Autism Society is particularly concerned about the proposed changes to Head Start's requirements for serving children with disabilities. Head Start is an important early childhood setting for children with developmental disabilities, including Autistic children. For many children and families, Head Start can be an important point of connection to early identification, developmental supports, health services, and educational resources.

Early childhood is a critical period for development, and early identification of developmental differences can help families better understand their child's strengths and support needs and connect families with appropriate services. Early intervention can support children's communication, learning, social development, adaptive skills, and participation in everyday activities. Head Start can play an important role in this process because educators and other



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program staff interact with children regularly and can help recognize developmental concerns, communicate with families, support referrals, and connect families with community resources.

For families of Autistic children, this role is particularly important. Families may first recognize developmental differences while their child is participating in an early childhood program, or they may be navigating an evaluation and eligibility process while their child is already enrolled. Head Start can provide stability and support during this period and can help ensure that children remain connected to an inclusive early learning environment while families navigate developmental and educational services.

We recognize the Department's goal of reducing unnecessary administrative burden on Head Start programs. However, reducing administrative burden should not come at the expense of protections and services that directly affect children's development, safety, inclusion, and ability to participate. The proposed rule would eliminate or weaken several requirements that are particularly important for children with Autism and other developmental disabilities.

Head Start's disability-specific requirements are not duplicative of existing federal disability laws. Rather, they provide a practical framework for Head Start programs to implement those laws in the context of early childhood education. Removing these requirements could create greater variation in how children with disabilities are identified, supported, included, and connected to services. The Autism Society urges HHS to rescind the proposed rule and maintain the existing Head Start standards that support children with disabilities and their families.

Requirements for serving children with disabilities

The proposed rule would remove requirements that ensure children with disabilities can participate fully in Head Start. Specifically, programs would no longer be required to accommodate children so they can participate in every aspect of the program, serve children while an evaluation for special education services is pending, or maintain current limits on suspension and the prohibition on expulsion. The proposal would also remove the protection that a child cannot be turned away on the premise of a disability or chronic health condition. These protections are especially important for Autistic children.

Autism is a developmental disability and can result in a wide range of communication, sensory, behavioral, learning, and support needs. Some children may communicate using augmentative and alternative communication, need additional time or visual supports to understand routines and expectations, or require individualized approaches to participate in classroom activities. These needs should not become a basis for excluding a child from an early childhood program.



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For young children with developmental disabilities, inclusion is not simply a matter of placement. Children need meaningful opportunities to participate, learn, communicate, build relationships, and develop independence alongside their peers. Removing requirements for reasonable accommodations and participation could make it easier for programs to exclude children whose needs require additional support.

The Autism Society is also concerned about the proposed changes to suspension and expulsion protections. Young children with Autism may communicate distress or unmet needs through behavior, particularly when they do not yet have reliable communication supports or when an environment does not adequately accommodate their sensory or developmental needs. Removing safeguards against suspension and expulsion could result in children being removed from early education settings because programs lack the resources, training, or supports necessary to respond effectively.

Suspension or expulsion also removes children from environments where they may benefit from consistent routines, skilled educators, early learning opportunities, and developmental supports. HHS should maintain strong protections against exclusion and ensure that disability-related needs are addressed through appropriate supports rather than removal from care.

Developmental screening, early identification, and early intervention

The proposed rule would eliminate developmental, hearing, vision, and other screening requirements, along with specified health, mental health, and dental services. The Autism Society is particularly concerned about eliminating the requirement that all Head Start children receive developmental screening within 45 days of enrollment, along with the detailed requirements for follow-up, referral, ongoing assessment, and individualization. These processes provide an important opportunity to identify developmental concerns early and connect children and families with appropriate supports.

Early identification and intervention are particularly important for the Autism community. Recognizing developmental differences as early as possible can help children and families understand a child's strengths and support needs and connect with appropriate services. Early intervention can support children's communication, learning, social development, adaptive skills, and participation in everyday activities.

For many families, however, identifying a developmental difference and navigating the systems needed to obtain support can be challenging. Head Start can serve as a critical bridge between



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children and families and the developmental, health, educational, and community-based services they need. Head Start staff may spend significant time with young children and can be well positioned to recognize developmental concerns, communicate those concerns with families, support referrals, and help families navigate the next steps.

For children who are Autistic or may be Autistic, this connection can be especially important. A Head Start program may be one of the settings in which developmental differences are first recognized or where a child receives support while an evaluation or eligibility determination is underway. The existing requirements help ensure that children do not lose access to an early learning environment while families are navigating this process. The proposed removal of requirements to serve children while an evaluation for special education services is pending could create an unacceptable gap between recognizing a child's needs and receiving appropriate supports.

Head Start can also play an important role during the transition from early intervention to preschool special education and other developmental services. Families should not have to navigate these systems alone, and children should not lose access to an inclusive early learning environment while services are being coordinated.

The Autism Society urges HHS to maintain requirements that support developmental screening, identification of concerns, referrals, and connections to appropriate services. Head Start should continue to serve as an important partner for families seeking to understand and address their children's developmental needs.

Qualified staff and training to support children with disabilities

The proposed rule would remove or weaken requirements related to teacher qualifications, effective teaching practices, program hours, and professional development. The proposal would also eliminate teacher training related to supporting children with disabilities and addressing challenging behaviors in the classroom. These changes are particularly concerning for children with Autism and other developmental disabilities.

Ongoing mental health consultation can also provide Head Start staff with additional expertise when children experience behavioral, social-emotional, or developmental challenges that affect participation. For Autistic children and children whose developmental needs have not yet been identified, consultation can help staff consider whether behavior may reflect an unmet communication, sensory, developmental, or other support need and identify appropriate strategies rather than relying on exclusionary responses.



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High-quality inclusion depends on educators having the knowledge and tools to support children with different communication, learning, sensory, and behavioral needs. Educators should be prepared to recognize developmental differences, use appropriate communication and instructional strategies, understand the purpose of individualized supports, and respond to behavior in ways that prioritize safety, dignity, communication, and learning.

Removing explicit training requirements related to children with disabilities could leave educators less prepared to support children with complex or high support needs. It could also increase the likelihood that a child's disability-related needs are misunderstood as simply behavioral problems.

The Autism Society urges HHS to maintain requirements for training and professional development related to disabilities, including Autism, communication, positive behavioral supports, inclusive practices, and strategies for responding to children's individual developmental needs.

Class size, teacher-child ratios, and individualized attention

The proposed rule would eliminate Head Start's current teacher-child ratios and class size requirements and instead defer to state child care licensing requirements. HHS estimates that this could result in each teacher being responsible for 16 to 32 percent more children per classroom.

Larger classrooms can create particular challenges for children with developmental disabilities. Children who require additional communication support, sensory accommodations, individualized instruction, or assistance with transitions may need more, not less, individual attention from educators.

Adequate staffing also affects safety. Educators must be able to supervise children effectively while simultaneously providing individualized support. Increasing classroom sizes could make it more difficult to recognize a child's distress, respond to communication attempts, support transitions, or address safety concerns.

For Autistic children who may have wandering or elopement risks, communication differences, or other disability-related safety needs, adequate staffing can be particularly important.



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Head Start should maintain class size and teacher-child ratio requirements that recognize the comprehensive developmental and educational mission of the program rather than relying solely on minimum state child care licensing standards.

Meaningful participation and communication

Children with Autism may communicate and interact with their environments in many different ways. Some children may be nonspeaking or minimally speaking, while others may use augmentative and alternative communication or other communication supports. Head Start programs should have the capacity to recognize and support these different forms of communication.

The Autism Society is concerned that reducing requirements related to qualified staff, disability training, individualized supports, and classroom resources could make it more difficult for children with communication disabilities to participate meaningfully in Head Start.

A child's ability to communicate verbally should never determine whether that child can participate fully in an early childhood program. Head Start should continue to support communication in all appropriate forms and ensure that educators have the training and resources necessary to respond to children's individual communication needs.

Family engagement and connection to services

Families of children with developmental disabilities often navigate multiple systems to obtain evaluations, early intervention, special education services, health care, and other supports. Head Start can serve as an important partner in helping families navigate these systems. The proposed rule would weaken requirements related to parent partnership services and remove requirements to address areas including safety, health, and economic security.

For families of Autistic children, strong family engagement can help ensure that information about a child's strengths, communication, support needs, and development is shared across the adults supporting that child. Families are also important partners in identifying what supports are effective for their child and in developing strategies that can be used consistently across settings.

Families of Autistic children may also need support understanding evaluation results, eligibility requirements, IFSP and IEP processes, available services, and the responsibilities of multiple agencies. Head Start staff can be an important source of practical support as families navigate these systems. The current Head Start standards provide disability-specific responsibilities for helping families understand their child's disability, participate in evaluations and IFSP/IEP



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processes, understand evaluation results, advocate for their child, and access equipment and services. Maintaining these requirements can help ensure that families are not left to navigate complex disability service systems alone. Head Start should continue to provide meaningful opportunities for families to participate in decisions about their children's education and development and to connect families with appropriate community resources.

Coordination with IDEA services is also critical. For children receiving early intervention or preschool special education services, Head Start can help ensure that the supports identified through an Individualized Family Service Plan (IFSP) or Individualized Education Program (IEP) are reflected in the child's day-to-day experience. Coordination between Head Start programs and IDEA agencies is particularly important for Autistic children, who may rely on consistent communication, developmental, educational, and behavioral supports across settings.

This coordination is especially important as children transition from early intervention to preschool special education and other early childhood services. The current Head Start standards provide a framework for coordinating with IDEA agencies, ensuring services identified through IFSPs and IEPs are delivered, and supporting children in their regular Head Start classrooms to the greatest extent possible. Removing these requirements could weaken the connection between IDEA services and children's participation in Head Start.

Protecting children who need additional support

The proposed changes should also be considered in the context of the children Head Start is intended to serve. Head Start programs serve children and families who may already face significant barriers to accessing health care, services, high-quality early education, and other supports.

Children with developmental disabilities can face additional barriers to obtaining timely evaluations and services. Reducing federal requirements without ensuring that other systems can fill these gaps risks creating a patchwork in which access to developmental screening, qualified educators, accommodations, and family support depends increasingly on where a child lives or which program they attend.

The Autism Society is particularly concerned that children with the highest support needs could be disproportionately affected. A program's ability to serve a child should not depend on whether that child can participate without individualized accommodations or additional support.



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Conclusion

Head Start's comprehensive standards are not simply administrative requirements. They establish the foundation for programs to provide high-quality early education while addressing children's health, development, safety, and family needs. The existing standards are particularly important for children with disabilities, including Autistic children who may require individualized communication, behavioral, sensory, educational, and safety supports.

For the Autism Society, the central concern with this proposed rule is what these changes could mean for young children with developmental disabilities and the families who rely on Head Start during a critical period of development. Head Start is not simply an early education program. For many children with Autism and other developmental disabilities, it can be an important point of early identification, intervention, inclusion, family support, and connection to the services that help children participate and thrive.

The existing Performance Standards provide a consistent national framework to ensure that children with disabilities are identified, welcomed, supported, and included. They also provide a practical bridge between Head Start programs, families, and the IDEA system. Removing these requirements could make that bridge weaker, leaving families to navigate evaluations, early intervention, IFSPs and IEPs, and other services with fewer protections and less consistent support.

Early identification only has value if it leads to meaningful support. A developmental screening should not simply identify that a child may need additional assistance. Families need a clear path to evaluation, early intervention, educational services, and other supports, and children need to remain included in early learning while that process is underway. Head Start is uniquely positioned to help make those connections.

The Autism Society supports efforts to reduce unnecessary administrative burden on Head Start programs. However, reducing burden should not mean removing the standards that protect access, inclusion, early identification, family engagement, and individualized support for children with disabilities. These protections should not depend on a family's ability to navigate multiple systems, a program's voluntary practices, or where a child happens to live.

We urge HHS to withdraw the proposed rule and preserve the existing Head Start Performance Standards for children with disabilities. If HHS determines that changes are necessary, any future rulemaking should be developed in meaningful partnership with Head Start programs, families, people with disabilities, and disability organizations and should preserve the substantive



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protections that ensure children with disabilities can fully participate in and benefit from Head Start.

Every child deserves the opportunity to be identified early, supported appropriately, included meaningfully, and given the strongest possible foundation for their future. For Autistic children and their families, Head Start can be a critical part of that foundation.

If you have any questions or need any further information, please contact Delancy Allred (dallred@autismsociety.org).

Sincerely,

Delancy Allred
Director of Public Policy
Autism Society of America