



**COLLABORATIVE FOR
ACADEMIC, SOCIAL, AND
EMOTIONAL LEARNING**

BOARD OF DIRECTORS

Kimberly Schonert-Reichl, Chair
University of Illinois at Chicago

Stephen D. Arnold
Vice Chair and Treasurer
Polaris Venture Partners

Deborah S. Delisle
Secretary
Education Leader & Advocate

J. Lawrence Aber
New York University

Daniel Anello
Kids First Chicago

Marc A. Brackett
Yale Center for Emotional
Intelligence

Catherine Bradshaw
Johns Hopkins University

Summer Braun
University of Alabama

Tommy Chang
New Teacher Center

Eric Gordon
Positive Education Program

Paul Goren
Northwestern University

Janice K. Jackson
Aspen Institute's Education &
Society Program

Melissa Johnston
Lemnis

Rose Prejean-Harris
DeKalb County School District

Andrea Wishom
Skywalker Properties

BOARD MEMBER EMERITI

Linda Darling-Hammond
Learning Policy Institute

Ann S. Nerad
Civic Leader

Mark T. Greenberg
Penn State University

Shruti Sehra
New Profit

Timothy P. Shriver
Special Olympics

PRESIDENT & CEO

Joshua P. Starr

September 17, 2026

Adam Jones
Deputy Chief of Staff, Immediate Office of the Assistant Secretary
Administration for Children and Families
Department of Health and Human Services
Washington, DC 202-417-0115

Re: Reducing Federal Burden for Head Start Programs (RIN: 0970-AD30)

Dear Mr. Jones:

On behalf of the Collaborative for Academic, Social, and Emotional Learning (CASEL), I am writing to submit comments and urge the Administration for Children and Families to withdraw the proposed rule and changes to the Head Start Program Performance Standards (Performance Standards). CASEL is a nonprofit, nonpartisan field leader in social and emotional learning (SEL) with a mission to help make evidence-based SEL an integral part of education, from preschool to high school. We collaborate with leading experts on schools, districts, and states nationwide to drive research, guide practice, and inform policy.

Maintaining the Performance Standards is critical to ensuring the high-quality learning environment of Head Start programs, which the proposed changes endanger by reducing federal requirements and creating greater uncertainty for providers, educators, and families about expectations for services; eliminating or weakening critical requirements related to social and emotional development; and raising significant legal and broader policy concerns for Head Start and other federally supported preschool programs.

Evidence Supporting SEL in Early Childhood Education

SEL and children's social and emotional development are foundational to learning and development in early childhood education (ECE), and it is critical that they remain key parts of Head Start programs. SEL in ECE has positive impacts on students' social and emotional competencies and skills, behavioral self-regulation, and early learning skills,^{1, 2} and having strong social and emotional skills in early childhood is associated with higher rates of full-time employment later in life.³ Specific to Head Start, the

¹ Murano, D., et al. (2020). A meta-analytic review of preschool social and emotional learning interventions. *Review of Educational Research*, 90(2), 227–263.

<https://doi.org/10.3102/0034654320914743>

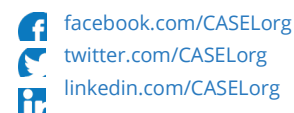
² Blewitt, C., et al. (2018). Social and emotional learning associated with universal curriculum-based interventions in early childhood education and care centers: A systematic review and meta-analysis. *JAMA Network Open*, 1(8), e185727.

<https://doi.org/10.1001/jamanetworkopen.2018.5727>

³ Jones, D. E., et al. (2015). Early social-emotional functioning and public health: The relationship between kindergarten social competence and future wellness. *American Journal of Public Health*, 105(11), 2283–2290. <https://doi.org/10.2105/AJPH.2015.302630>

CASEL.ORG

Phone: 312.226.3770
815 West Van Buren St., Suite 210
Chicago, IL 60607-3566





benefits of SEL have been directly tested. For example, a randomized study of 44 Head Start classrooms found that children who participated in Head Start REDI, an intervention that included lessons and teaching strategies designed to promote social and emotional competencies alongside language and literacy development, demonstrated significantly greater gains in emotional understanding, social problem-solving, social behavior, and learning engagement, as well as vocabulary and emergent literacy skills, than children in other classrooms.⁴ Follow-up studies found long-term benefits for the same students exposed to Head Start REDI all the way through high school, including improved mental health and behavioral adjustment.⁵

The broader evidence on SEL also demonstrates its relationship to children's academic and school-related outcomes. A 2023 meta-analysis of over 400 studies showed that students participating in SEL at school had higher "school functioning," including grades, test scores, attendance, homework completion, and engagement.⁶ A 2025 meta-analysis found that students who participate in SEL interventions for a full year saw their overall academic achievement improve nearly a full grade.⁷

Taken together, the evidence suggests that SEL is a hallmark of high-quality ECE and Head Start programs.

The Importance of the Performance Standards

The Performance Standards establish a set of minimum requirements, including those that help ensure that social and emotional development is a key component of the Head Start learning environment, professional development for educators, and child assessment. They also establish requirements related to teacher development and coaching, class size, teacher-child ratios, parent and family engagement, and protections and supports for children with disabilities and multilingual learners. The proposed rule would remove or reduce these requirements while seeking to expand the number of children served without assuming additional funding. While expanding access to Head Start is a worthy goal, doing so by reducing or removing requirements that support program quality could leave providers with less capacity to provide the range and quality of services that children need. These changes could create greater variation in how programs support children's social and emotional development and limit providers' capacity to provide high-quality instruction and SEL that supports better long-term outcomes.

The Performance Standards are also critical because they translate the statutory requirements governing Head Start into a comprehensive and actionable set of expectations for providers. Although the Head Start Act⁸ establishes important requirements—including those related to social and emotional development—many of the specific practices included in the Performance Standards are not prescribed in statute. The Performance Standards provide the detail and specificity programs need to understand how those requirements should be

⁴ Bierman, K. L., et al. (2008). Promoting academic and social-emotional school readiness: The Head Start REDI program. *Child Development*, 79(6), 1802–1817. <https://doi.org/10.1111/j.1467-8624.2008.01227.x>

⁵ Bierman, K. L., et al. (2025). How a preschool intervention affected high school outcomes: Longitudinal pathways in a randomized-controlled trial. *Child Development*, 96(3), 1236–1249. <https://doi.org/10.1111/cdev.14235>

⁶ Cipriano, C., et al. (2023). The state of evidence for social and emotional learning: A contemporary meta-analysis of universal school-based SEL interventions. *Child Development*, 94(5), 1181–1204. <https://doi.org/10.1111/cdev.13968>

⁷ Ha, C., et al. (2025). Disentangling the effects of social and emotional learning programs on student academic achievement across grades 1–12: A systematic review and meta-analysis. *Review of Educational Research*. <https://doi.org/10.3102/00346543251367769>

⁸ Head Start Act. (2007). *Head Start Act, as amended December 12, 2007* [Compilation prepared by the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Head Start]. https://headstart.gov/sites/default/files/pdf/HS_Act_2007.pdf.



implemented. Without this comprehensive framework, programs would face greater uncertainty about expectations and would need to piece together requirements across statutory provisions and other sources rather than relying on a single set of standards that provides a clear and consistent baseline for program quality.

Implications for Social and Emotional Development

The proposed rule would substantially reduce the Performance Standards' explicit requirements related to children's social and emotional development. The current Standards require that Head Start programs provide high-quality early education and child development services that promote children's cognitive, social, and emotional growth, and provide developmentally, culturally, and linguistically appropriate learning experiences in social and emotional functioning. They further require that programs provide a learning environment that features effective teaching practices, including promoting social, emotional, and behavioral development and fostering trust and emotional security. The proposed rule would remove these specific regulatory requirements, as well as requirements that staff receive ongoing professional development related to those requirements. Reducing the clarity and consistency with which social and emotional development is incorporated into Head Start programs' approaches to teaching and learning would give children fewer intentional opportunities to develop skills such as self-management, communication, problem-solving, and relationship-building. Removing these requirements could leave programs with less consistent direction and less professional development to ensure that social and emotional development remains an integral part of the Head Start experience.

The proposed rule would also remove the current regulatory requirement to use CLASS: Pre-K as the measure of classroom quality, as well as the associated CLASS: Pre-K thresholds used in the designation renewal system. While the proposed rule would retain a statutory requirement to assess classroom quality, removing the specific regulatory requirements related to CLASS would reduce consistency in how classroom quality and teacher-child interactions are assessed across Head Start programs. The CLASS framework provides a common way to examine aspects of classroom experience—including emotional support, positive climate, and regard for children's perspectives—that are closely connected to the quality of children's social and emotional experiences. Reducing this consistency could make it more difficult for programs and educators to identify areas for improvement, target professional learning and coaching, and ensure that children and families receive a consistent level of high-quality, responsive care regardless of the Head Start program.

The proposed rule would also weaken children's social and emotional development through the removal and reduction of requirements that support the broader conditions that enable children to develop and practice these skills. For example, the proposed rule would remove evidence-based teacher-child ratio requirements that support individualized learning and safe learning environments, limit opportunities for parent involvement, and remove protections against exclusionary discipline practices such as suspensions and expulsion. These provisions may not be labeled as social and emotional development, but they help create the stable, responsive, and relationship-rich environments in which children develop skills such as self-regulation, cooperation, communication, and relationship-building.

Compliance with Federal Law and Broader Implications

The proposed rule also raises serious concerns regarding compliance with the Head Start Act and underscores the broader problem with substantially reducing the Performance Standards. Section 641A(a)(2)(C) of the statute requires the Secretary of Health and Human Services to ensure that any revision of the Performance Standards “will not result in the elimination of or any reduction in quality, scope, or types” of the services required under the Performance Standards. As established above, the proposed rule would eliminate or substantially reduce numerous requirements that currently establish a federal floor for the quality of Head Start



services, including requirements related to social and emotional development, teacher-child interactions, teacher-child ratios, family engagement, and protections for children and families. By proposing to remove or weaken requirements that have helped establish consistent expectations for high-quality Head Start services without demonstrating how those changes maintain quality, the proposed rule fails to adequately address this statutory requirement. More broadly, the proposed reductions demonstrate the risk of treating the Performance Standards primarily as a source of regulatory burden rather than as the articulation of the federal quality floor Congress established to ensure that children and families receive comprehensive, high-quality services.

The proposed changes also have implications beyond Head Start. Under Section 1112(c)(7) of the Elementary and Secondary Education Act,⁹ local educational agencies (LEAs) that use Title I funds to provide early childhood education services to low-income children (below the age of compulsory school attendance) must ensure that those services comply with the Performance Standards. Consequently, changes to the Performance Standards would also change the federal requirements applicable to Title I-funded preschool programs operated by LEAs. This creates a broader concern: A reduction in the quality or specificity of the Performance Standards could also reduce expectations beyond Head Start.

Conclusion

The Performance Standards play a critical role in ensuring that Head Start programs provide consistent, high-quality services to children and families, while giving providers and educators clear expectations for how those services should be delivered. The proposed rule would weaken that framework by reducing requirements related to social and emotional development and other core aspects of program quality, creating greater uncertainty for educators and families and raising serious concerns about compliance with the Head Start Act. For these reasons, CASEL urges the Administration for Children and Families to withdraw the proposed rule and maintain the current Performance Standards.

Sincerely,

Joshua P. Starr, EdD
Chief Executive
Officer

⁹ Elementary and Secondary Education Act of 1965. (2024). *Elementary and Secondary Education Act of 1965, as amended through December 23, 2024* [Compilation]. U.S. Government Publishing Office.
<https://www.govinfo.gov/content/pkg/COMPS-748/pdf/COMPS-748.pdf>