



October 2, 2026

The Honorable Robert F. Kennedy, Jr
Secretary
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Kennedy,

On behalf of the National CACFP Association (NCA), thank you for the opportunity to comment on the Notice of Proposed Rulemaking (NPRM), Reducing Federal Burden for Head Start Programs ACF-2026-0595.

Background

NCA represents thousands of organizations and professionals that operate and administer the USDA Child and Adult Care Food Program (CACFP), including Head Start and Early Head Start programs serving children in communities across the country. Consistent with NCA's mission to provide nutrition education, training, and compliance resources, we support policies that strengthen children's access to nutritious meals while ensuring programs have the resources needed to meet federal requirements successfully.

Overview

We support the Office of Head Start's continued emphasis on child health, nutrition, and physical activity as critical contributors to children's growth, development, school readiness, and lifelong health.

Head Start and Early Head Start programs have a long history of supporting children's health through high-quality nutrition services and play a critical role in ensuring children have access to nutritious meals during a period of rapid growth and development. For many participating families, meals served through Head Start are the healthiest meals children receive each day. Nutrition services are a foundational component of the Head Start model, supporting early intervention efforts, promoting healthy eating habits, and contributing to positive long-term health outcomes.

NCA is concerned that the rule does not sufficiently address the financial and operational realities of delivering high-quality nutrition services that emphasize nutrient-dense, whole foods within Head Start and Early Head Start programs. Without adequate investment and support, the proposed changes could unintentionally limit programs' ability to sustain the nutrition and health practices the rule seeks to encourage.

Administrative Cost Cap Reduction Threatens Nutrition Quality and Access

NCA is concerned that reducing the allowable administrative cost cap from 15% to 5% may significantly weaken the infrastructure necessary to provide quality nutrition services within Head Start and Early Head Start programs.

The NPRM places substantial emphasis on nutrition, healthy eating, physical activity, parent engagement and nutrient-dense whole foods. However, nutrition services depend on far more than food purchases alone. Programs must support a significant amount of administrative work:

- Meal counting, claiming, and reimbursement management;
- Procurement and vendor oversight;
- Menu planning and nutrition analysis;
- Food safety and sanitation compliance;
- Monitoring and recordkeeping;
- Staff training and professional development; and
- Audit preparation and program integrity functions.

These activities are essential for delivering quality nutrition services and ensuring compliance with federal program requirements.

Reducing the administrative cost cap to 5% could lead to a weakened administrative capacity and would likely limit programs' ability to offer a variety of menus, purchase and prepare fresh foods, maintain nutrition oversight and quality assurance, and support staff training necessary for successful implementation of nutrition standards.

"It is nearly impossible to operate the CACFP without using Head Start funds as is. If we are required to implement more whole foods (which I am not at all opposed to), I am unsure how to cover those costs. It will also require much more staff time to prep meals, which we would not be able to cover with the reduction of 10% of our administrative costs." – Head Start Survey Respondent

In a survey conducted by NCA of over 500 Head Start and Early Head Start Programs, 60% stated that a reduction of the administrative cost cap would negatively impact the amount of staff time they dedicate to CACFP nutrition services. Additionally, 30% of programs stated that they would be required to eliminate staff who support their nutrition programs, such as administrative personnel, financial staff, and nutrition consultants. These staffing reductions would shift critical responsibilities to already stretched employees, increasing administrative burden and reducing the capacity to maintain nutrition quality, program compliance, staff training, and effective meal service operations.

Reducing administrative capacity could result in:

- Reduced nutrition staffing and expertise;
- Increased reliance on processed, lower-cost food products;
- Reduced ability to maintain CACFP compliance;
- Increased audit findings and fiscal risk;
- Less training for food service personnel;
- Reduced capacity to accommodate special dietary needs;
- Reduced menu variety; and
- Less parent nutrition education and engagement.

Survey respondents indicated that a reduction in administrative funding would directly affect the quality of meals served to children by negatively impacting staff time dedicated to the CACFP (60%), the variety of foods served (43%), and the freshness of food served (32%).

Programs cannot provide higher-quality meals with fewer resources. NCA urges ACF to maintain the current 15% administrative cost cap.

Reduced Hours of Service and Increased Staff-to-Child Ratios Could Affect Children's Access to Meals

NCA is concerned that reducing service-hour requirements could result in some children spending less time in care settings. For many children, particularly those experiencing food insecurity, Head Start meals provide a significant portion of their daily nutritional intake. If programs shorten schedules or modify service models in response to regulatory changes, some children could lose access to meals and/or snacks. The potential impact on food security should be considered when evaluating overall effects on child health and nutrition.

NCA is concerned that eliminating staff-to-child ratio requirements could also have unintended consequences for children's nutrition and mealtime experiences. Appropriate staffing levels are essential to ensuring that meals are served safely, that children receive adequate assistance during meals, and that mealtimes remain meaningful opportunities for learning and development. Larger class sizes or fewer adults in the classroom may reduce staff capacity to encourage healthy eating behaviors, monitor dietary accommodations and allergies, support younger children during meals, and identify children who may be experiencing nutrition or food insecurity. As staffing levels decrease and workloads increase, programs may find it increasingly difficult to provide the individualized support that contributes to positive nutrition outcomes and healthy habits during early childhood.

Expanded Expectations Are Being Proposed with Little Consideration of Staffing Requirements

The proposed rule promotes nutrient-dense, whole foods, family-style meal service, increased physical activity opportunities, and enhanced developmental experiences during meals.

NCA supports these goals. However, each of these activities requires staffing, planning, administrative oversight, and significant resources. While operators of the CACFP will continue to have access to CACFP reimbursement, we know that it is not enough to accomplish the goals of the proposed rule. Over 74% of programs reported that reimbursement does not fully cover nutrition program expenses, including food and labor, stating that they frequently use Head Start funds and other non-CACFP funding to meet the current nutritional needs of children.

To prioritize serving fresh fruits and vegetables, whole grains, milk, and minimally processed meats and meat alternates, significantly more planning and operational support is required. Programs must devote staff time to procurement, menu planning, food preparation, and training on how to handle and prepare whole foods.

When administrative funding is constrained, programs face pressure to prioritize cost over quality. This creates a direct incentive to purchase cheaper, more highly processed products rather than fresh and minimally processed foods. Through NCA's survey, 43% of programs indicated that a decrease in the administrative funding cap would negatively impact the variety of foods served and 32% said it would negatively impact the freshness of food served. If ACF intends to prioritize nutrient-dense, whole foods, the agency must also recognize the staffing and administrative investments required to make those foods available to children.

"We currently operate three sites with kitchens staffed by cooks and kitchen assistants. While CACFP reimbursements help offset the cost of providing meals, they do not cover the full cost of our kitchen staffing and food service operations. As a result, we rely on Head Start funds to supplement these costs, including staffing, food purchases, and the maintenance and repair of kitchen equipment. The additional Head Start funding is critical to maintaining a high-quality food service program." – Head Start Survey Respondent

NCA also encourages ACF to provide additional clarity on what foods meet the criteria of "nutrient-dense, whole foods" to ensure consistent implementation across programs. Without clear standards, programs may struggle to determine compliance expectations, particularly when balancing nutritional quality with budget constraints.

NCA strongly supports the continued requirement that Head Start programs participate in USDA Child Nutrition Programs and provide meals that follow the CACFP meal patterns. The CACFP already provides a nationally-recognized framework for serving nutritious meals and snacks that support child health and development. Maintaining alignment between Head Start nutrition requirements and CACFP standards reduces duplication, promotes consistency, and helps ensure that children receive meals that meet evidence-based nutrition requirements.

NCA also supports the continued requirement that programs utilize qualified staff or consultants to support nutrition services. However, this requirement illustrates why adequate administrative capacity remains necessary. Nutrition professionals, consultants, menu planners, and compliance staff are often funded through administrative budgets. The proposed reduction in allowable administrative costs may prevent programs from retaining the very expertise necessary to fulfill this requirement.

In addition, NCA opposes the removal of requirements related to accommodating children with special dietary needs and disabilities. These accommodations are essential to ensuring equitable access to nutrition services while protecting the health and safety of participating children.

Ensuring Family Support Services for Health and Nutrition

NCA supports the continued focus on helping families learn about healthy eating and physical activity. Strong nutrition education for parents extends the impact of Head Start beyond the classroom and helps establish lifelong healthy habits.

However, family engagement and nutrition education require staff time, training, and resources. Programs cannot effectively conduct nutrition outreach if administrative funding reductions result in the elimination of family support staff, nutrition coordinators, or other personnel responsible for these activities.

NCA is also concerned about the removal of requirements related to broader health education topics, including medical and oral health, mental health, pregnancy and postpartum care, and vehicle safety. These services have historically contributed to Head Start's comprehensive approach to supporting child and family well-being. While this comment focuses on nutrition, nutrition outcomes are closely connected to overall family health and access to supportive services.

Preserve Nutrition Best Practices in Teaching and Learning Environments

NCA supports the continued recognition of meal and snack times as valuable learning opportunities. Meals provide children with opportunities to develop social skills, self-regulation, language development, and healthy eating behaviors.

NCA also supports the continued encouragement of family-style meal service, when developmentally appropriate. NCA's survey found that 93% of programs are already implementing family-style meal service. Family style dining can help children develop healthy relationships with food while promoting independence and social interaction.

NCA is concerned about the removal of provisions requiring programs to provide children adequate time to eat and ensuring children are not forced to finish foods they do not want to eat.

These provisions reflect widely accepted child nutrition best practices and support healthy feeding environments. Retaining these standards would help ensure that nutrition services focus not only on what foods are served, but also on how children experience meals and develop lifelong eating habits.

Conclusion

Head Start has long recognized that nutrition is fundamental to children's healthy development and readiness to learn. NCA appreciates the NPRM's continued emphasis on nutrition, healthy eating, and physical activity. However, the proposed reduction of the administrative cost cap, potential increase in staff-to-child ratios, and possible reduction in service hours would significantly hinder programs' ability to implement many of the nutrition priorities outlined throughout the rule.

The staff, systems, oversight, training, and procurement functions classified as administrative costs are the very mechanisms that allow programs to operate the CACFP, serve high-quality meals, accommodate special dietary needs, educate families, maintain compliance, and provide nutrient-dense, whole foods.



NCA urges ACF to:

- Maintain the current 15% administrative cost cap allocation;
- Recognize the staffing resources necessary to support high-quality nutrition services;
- Retain provision that supports positive mealtime practices;
- Preserve and strengthen support for family style meal service;
- Provide clarity regarding expectations for nutrient-dense, whole foods;
- Evaluate how changes to service-hour requirements may affect children's access to meals and snacks; and
- Consider the cumulative financial impact of further nutrition-related requirements, including anticipated CACFP meal pattern updates, increased expectations for scratch and semi-scratch cooking, staff training requirements, food procurement, and menu planning responsibilities.

NCA appreciates the opportunity to share the perspectives of Head Start and Early Head Start operators, leadership, and stakeholders. We welcome continued collaboration with ACF to strengthen child nutrition programs and ensure that regulatory changes support, rather than diminish, the nutrition services that are fundamental to children's health, development, and long-term well-being.

Sincerely,

Alexia Thex

A handwritten signature in black ink that reads "Alexia Thex".

President
National CACFP Association

Deborah Gillison-Wilson

A handwritten signature in black ink that reads "Deborah Gillison-Wilson".

Board Chair
National CACFP Association