



AMERICA'S PEDIATRIC DENTISTS
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September 29, 2026

Submitted electronically

Alex J. Adams, PharmD, MPH
Assistant Secretary of the Administration for Children and Families
U.S. Department of Health and Human Services
330 C Street, S.W.
Washington, D.C. 20201

Re: Reducing Federal Burden for Head Start Programs (ACF-2026-0595)

Dear Assistant Secretary Adams:

On behalf of over 11,000 members of the American Academy of Pediatric Dentistry (AAPD), the following comments are provided in response to the Administration for Children & Families (ACF) proposed rule “Reducing Federal Burden for Head Start Programs” [ACF-2026-0595]. The proposed rule would remove Head Start Performance Standards, including 45 CFR §1302.42 and §1302.43, thereby eliminating daily toothbrushing and health screening requirements that ensure children receive appropriate, timely, and continuous oral health care. **AAPD strongly supports programs that advance children’s oral health and urges ACF to revise the proposed rule.**

The AAPD is a national, not-for-profit professional association representing the specialty of pediatric dentistry. AAPD advocates for the optimal oral health of all infants, children, adolescents, and individuals with special health care needs. Our 11,000 members include pediatric dentists, general dentists who care for children, academicians, and community leaders. The AAPD promotes evidence-based policies, best practices, and clinical guidelines; educates and informs policymakers, parents and caregivers, and other health care professionals; provides continuing professional education; supports research that advances the science of pediatric oral health; and promotes programs that improve oral health for children.

Dental caries is the most common chronic disease among children in the United States. More than 10% of children aged two to five have at least one untreated cavity, and among low-income families, that rate is nearly twice as high at 18%.ⁱ The disparity increases with age: about one in five children ages six to eight has untreated decay in one or more primary teeth, with rates nearing one in four among children in middle to high-poverty households.ⁱ Building healthy oral health habits early, such as toothbrushing and regular dental examinations, can help prevent caries and other chronic dental diseases as children grow.

Eliminating key oral health standards would weaken protections for children enrolled in Head Start. Oral health is an essential component of overall health, and these standards help ensure

that children receive appropriate preventive care, timely treatment, and support from Head Start programs. AAPD specifically opposes the proposed elimination or modification of the following provisions of the Head Start Program Performance Standards under 42 U.S.C. §9801 et seq., subchapter B of 45 CFR chapter XIII:

1. **Elimination of §1302.43 Oral Health Practices:**

The proposed rule would eliminate §1302.43, which requires children enrolled in Head Start programs to brush their teeth once daily. Toothbrushing is an evidence-based practice that helps prevent dental caries. Early childhood caries (ECC) disproportionately affects children from lower-socioeconomic households, including children enrolled in Head Start. The behavioral intervention of toothbrushing with fluoridated toothpaste is associated with lower rates of ECC and is recognized as a best practice in children's healthcare.ⁱⁱ Additionally, incorporating daily toothbrushing into Head Start programming provides children with hands-on opportunities to develop the knowledge, skills, and routines necessary to maintain good oral health throughout their lives.

Although the proposed rule seeks to reduce regulatory redundancy and to utilize standards already included in the Head Start Act and other federal laws, the daily toothbrushing requirement is not codified in the Head Start Act. As a result, eliminating §1302.43 would remove an important oral health performance standard without a corresponding statutory safeguard. **Given the importance of establishing healthy oral hygiene behaviors early in life, AAPD strongly urges ACF to exclude §1302.43 from the proposed rule and to retain the requirement for daily toothbrushing in Head Start programs.**

2. **Elimination of §1302.42 Child Health Status and Care:**

Integrating oral health into Head Start programs has been a longstanding effort. The proposed rule would also remove several requirements under §1302.42 that ensure children receive appropriate, timely, and continuous oral health care through Head Start programs. The proposed rule would eliminate the requirement for programs to obtain an oral health professional's determination of whether a child is up to date on age-appropriate oral health care. Each state is required to identify a dental periodicity schedule under the state's Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) program. The oral health services at Head Start have helped families stay up to date in the care of their children (§1302.42(b)(1)(i)) and (§1302.42(b)(1)(ii)). The Head Start Program Information Report (PIR) includes tailored questions to determine whether a program is staying up to date with the state's dental periodicity schedule.

The proposed rule would also remove requirements for programs to support parents in maintaining recommended oral health care schedules and continuity of care (§1302.42(c)(1)) and requirements to track referrals and services addressing children's oral health treatment needs (§1302.42(d)(2)). The Head Start health standards are notable for connecting children to

care in their community and supporting them in establishing dental homes. Head Start data from 2023 found that children meeting the benchmark for *continuous, accessible dental care* showed the greatest improvement among children's health benchmarks since 2019, increasing from 80% to 86% receiving continuous care.ⁱⁱⁱ Children who have an established dental home are more likely to receive needed routine oral health care and improve their preventive oral health practices.^{iv}

Finally, the proposal would eliminate the requirement for programs to facilitate preventive care, treatment, and follow-up recommended by oral health professionals (§1302.42(c)(3)).

Preventive oral health care is one of the most successful Head Start healthcare interventions. In 2026, 98% of children received preventive dental care (673,861 children out of 685,296 funded seats), making it the most successful health intervention.^v

Overall, AAPD strongly urges ACF to rescind the removal of §1302.42 as the standards exist to promote evidence-based practices and connect families to care.

The removal of these regulations – as proposed in the rule – would significantly undermine Head Start's progress in preventing and addressing the most prevalent chronic disease of childhood. Children from low-income households experience a disproportionate burden of dental disease and face greater barriers accessing oral health care, making Head Start's role in connecting these children and families to preventive services particularly important. Preventing dental disease is cost-effective; dental caries can result in significant expense to families, communities, Medicaid programs, and states. **AAPD strongly urges ACF to retain these provisions to protect and advance the oral health, overall health, and wellbeing of children enrolled in Head Start.** We appreciate the opportunity to share feedback on the proposed rule, and we remain available (Lauren Mann, lmann@aapd.org) if any additional information or clarification would be helpful.

Sincerely,



Carlos A. Bertot, DMD
President
American Academy of Pediatric Dentistry

ⁱ Centers for Disease Control and Prevention, [Oral Health Surveillance Report: Dental Caries, Tooth Retention, and Edentulism, United States, 2017–March 2020](#) (2024).

ⁱⁱ American Academy of Pediatric Dentistry, [Policy on Early Childhood Caries \(ECC\): Consequences and Preventive Strategies](#), The Reference Manual of Pediatric Dentistry 96–100 (2025).

ⁱⁱⁱ Office of Head Start, [Head Start Program Facts: Fiscal Year 2023](#) (2023).

^{iv} American Academy of Pediatric Dentistry, [Policy on the Dental Home](#), The Reference Manual of Pediatric Dentistry 42–44 (2025).

^v National Head Start Association, [2026 State Fact Sheet: National Overview](#) (2026).