



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

Dear Assistant Secretary Adams,

On behalf of the American Student Dental Association (ASDA), I write to express our concerns with the proposed rule, "Reducing Federal Burden for Head Start Programs," from the Administration for Children and Families (ACF). Specifically, the proposed rule would remove requirements for daily toothbrushing and preventive oral health services by eliminating 45 CFR § 1302.42 and § 1302.43. This elimination would have serious ramifications for the over 685,000 children enrolled in Head Start across the country.

Tooth decay is the most prevalent chronic disease amongst children.¹ Research has found that children from lower income households tend to have more tooth decay and cavities compared to children from wealthier households.¹ Chronic cavities can lead to extreme pain, missed days of school, and greater oral health trauma.² Children who are supported in building healthy habits, such as brushing their teeth daily and receiving regular dental exams, are better able to prevent dental disease. These habits can be carried into adulthood, reducing both their need for treatment and its costs to families and public programs.

As future dentists, we are committed to optimizing oral health for all children. Removing these standards would undermine daily toothbrushing practices and their connection to preventative care for children enrolled in Head Start, and we urge ACF to reconsider.

Thank you for your consideration of our concerns. If you have any questions, please feel free to reach out to advocacydept@asdanet.org.

Sincerely,

A handwritten signature in cursive script that reads "Honesty Boone".

Honesty Boone

2026-26 ASDA President



References:

1. Centers for Disease Control and Prevention. *Oral Health Surveillance Report: Dental Caries, Tooth Retention, and Edentulism, United States, 2017–March 2020*. US Department of Health and Human Services; 2024. <https://www.cdc.gov/oral-health/php/2024-oral-health-surveillance-report>
2. American Academy of Pediatric Dentistry. Policy on early childhood caries (ECC): consequences and preventive strategies. *The Reference Manual of Pediatric Dentistry*. Chicago, IL: American Academy of Pediatric Dentistry; 2025:96-100.