

The Honorable Ricardo S. Martinez

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

WASHINGTON STATE ASSOCIATION OF HEAD
START AND EARLY CHILDHOOD ASSISTANCE AND
EDUCATION PROGRAM, ILLINOIS HEAD START
ASSOCIATION, PENNSYLVANIA HEAD START
ASSOCIATION, WISCONSIN HEAD START
ASSOCIATION, FAMILY FORWARD OREGON, and
PARENT VOICES OAKLAND,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official capacity as
Secretary of Health and Human Services; U.S.
DEPARTMENT OF HEALTH AND HUMAN SERVICES;
ANDREW GRADISON, in his official capacity as Acting
Assistant Secretary of the Administration for Children and
Families; ADMINISTRATION FOR CHILDREN AND
FAMILIES; OFFICE OF HEAD START; and TALA
HOOBAN, in her official capacity as Acting Director of
the Office of Head Start,

Defendants.

Case No. 2:25-cv-00781-RSM

**DECLARATION OF
CLARISSA DOUTHERD IN
SUPPORT OF PLAINTIFFS'
MOTION FOR A
PRELIMINARY
INJUNCTION**

NOTE ON MOTION
CALENDAR:

JUNE 13, 2025

1 I, Clarissa Doutherd, hereby declare and state as follows:

2 1. I am over eighteen years old, and I have personal knowledge of the facts set
3 forth in this Declaration. I could and would testify competently to those facts if called as a
4 witness in this case.

5 **I. Parent Voices Oakland's Mission and Activities**

6 2. I am the Executive Director of Parent Voices Oakland ("PVO"). I have served
7 as the Executive Director since 2013. Prior to serving as Executive Director, I served as a PVO
8 community organizer, working closely with parents and families to advance access to high-
9 quality, affordable, and accessible childcare.

10 3. In addition to my professional experience and background, I am a Black mother
11 of a son and have personal knowledge of and experience with navigating the childcare system
12 as a low-income single parent. In fact, I was first introduced to PVO's work while in the
13 process of seeking a childcare subsidy for my family in California. I have direct knowledge of
14 the many barriers to accessing childcare and early education in the Bay Area.

15 4. PVO is a parent-led non-profit organization that organizes, educates, and
16 advocates for affordable, accessible, and quality childcare for families, and particularly low-
17 income families of color, in Oakland and the surrounding Bay Area in California. PVO's multi-
18 racial, multi-lingual, and multi-generational membership includes parents and caregivers in
19 Oakland and the surrounding Bay Area, including parents and caregivers of children currently
20 enrolled in Head Start programs.

21 5. The mission of PVO is to make quality, accessible, and affordable childcare
22 available to all families, and to organize, support, and empower parents and caregivers in
23 becoming life-long advocates for their children. PVO's programs are developed to expand
24 local, state, and federal resources for a childcare delivery system that is comprehensive and
25 community driven, and that provides support for children and families universally. Through
26 community organizing, parent education and leadership development, coalition building, and
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1 civic engagement, PVO elevates the visibility of low-wage workers, and particularly Black
2 workers and other workers of color, who cannot afford the full cost of childcare.

3 6. As the Executive Director, I serve as the chief executive, strategic lead, and
4 public representative of the organization. This position is responsible for the overall success,
5 sustainability, and alignment of the organization's mission, vision, and values with its
6 operations, programs, and campaigns. The Executive Director leads a staff team, collaborates
7 with community leaders, and ensures community-led governance in all strategic initiatives,
8 including the implementation of a multi-decade public funding measure and federal and state
9 policy advocacy.

10 7. My day-to-day activities include meeting with parent leaders, childcare
11 workers, agency directors and chief executive officers, and coalition partners to strategize
12 campaigns and implementation plans; reviewing financial reports and ensuring public fund
13 stewardship; coordinating with city and county officials around policy and budget advocacy
14 based on a landscape analysis of childcare service and community needs; attending legislative
15 briefings and educating public officials on the organization's goals; leading staff team
16 meetings and supporting professional development; speaking at press conferences and public
17 hearings; drafting grant proposals, campaign strategies, and public communications;
18 participating in community events, forums, and town halls; problem-solving operational
19 challenges or policy roadblocks; and ensuring that the organization remains grounded and
20 accountable to the parents and families it serves.

21 8. As the Executive Director for PVO, I have forged deep partnerships with
22 community-based direct service providers, labor unions, and large government agencies
23 providing programs and services for families and their children in service of PVO's campaigns
24 and goals. Through increased collaboration and dialogue across these coalition partners, PVO
25 has built a unified voice across stakeholders to address inadequate funding and other barriers
26 in the early childhood and childcare systems.

1 9. I have served as the Co-Chair on the Alameda County Early Childhood Policy
2 Committee (“ACECPC”), where we bring parents and families together with childcare
3 providers, agency leaders, and policy makers to identify and bridge gaps within childhood
4 service delivery. Through increased dialogue between parents, providers, and policy makers,
5 the ACECPC seeks to develop consistent guidelines for principles, practice, and policy for
6 parent leadership and engagement organizations; develop a shared understanding of an early
7 childhood system of care in Alameda County; and identify opportunities for parents to engage
8 in decision-making and build leadership capacity. Through the ACECPC, I helped to lead
9 efforts to increase funding and support for early education and childcare programs, to prevent
10 closure of childcare programs, and other initiatives to support parents and their families.

11 10. I also have served as a key leader on coalition efforts to secure increased and
12 more equitable access to high-quality childcare services in Alameda County through funding
13 and policy measures, and was featured in the documentary “Clarissa’s Battle” about these
14 community-centered campaigns.¹

15 11. I also currently serve as a Commissioner on the Alameda County First 5
16 Commission, which aims to support the health, development, and well-being of our youngest
17 children during their first five years. Commissioners are selected and appointed by the
18 Alameda County Board of Supervisors based on their expertise in early care and education,
19 healthcare, social services, and children with special needs.

20 12. In addition to my position as Executive Director, PVO has additional staff
21 members dedicated to carrying out its activities and supporting its mission and goals. PVO has
22 a Director of Operations; Director of Organizing; a Parent Advocacy Coordinator; and two
23 Community Organizers.

24 13. PVO runs an organizing fellowship program, where parents learn community
25 organizing skills, receive education on healthcare and childcare systems, and engage in
26 outreach to their neighborhoods, schools, child development centers, and places of worship.

1 PVO also has volunteers who support its events, including parent policy forums, door-to-door
2 outreach, and tabling at community events.

3 14. PVO is primarily funded through private foundation grants, individual
4 donations, and a small amount of royalties from publications about our work.

5 15. PVO maintains an organizational structure designed to center and uplift the
6 voices and perspectives of parents and caregivers. For example, PVO has a base of parent
7 leaders and organizers who have direct knowledge of and experience with the childcare system
8 in Oakland and the surrounding Bay Area. PVO is in constant contact with its parent, caregiver,
9 and childcare provider members in various ways, including, but not limited to, monthly parent
10 and caregiver membership meetings, one-on-one meetings with parent and caregiver members
11 on a weekly basis, coalition meetings (including monthly committee meetings with parents and
12 agencies), community workshops, direct actions and rallies, and other meetings and events.

13 16. PVO currently has three campaigns, including (1) Save Head Start, in which
14 PVO is taking action to demand that the future of Head Start is secured and shaped by directly
15 impacted parents and workers; (2) Voices for Health Justice, in which PVO is fighting to
16 identify and address root causes of health inequities and disproportionately high infant
17 mortality rates for Black families; and (3) Protect Public Education, in which PVO is calling
18 on elected leaders to commit to policy and budget solutions for equality early education for
19 children, and especially Black children and other children of color.

20 17. In 2023 alone, PVO trained 124 parent leaders, and secured pledges from 573
21 Alameda County families to fight for increased access to affordable childcare. Moreover,
22 through its organizing and outreach efforts, PVO staff and members reached over 23,800
23 community members by phone and text banks, knocked on over 1,300 doors, and had over 760
24 conversations with Oakland residents. Through these efforts, PVO helped to secure \$14.4
25 million dollars in general purpose funding to sustain and expand Oakland Head Start programs,
26 protected 52 Head Start jobs, and saved three Head Start sites from closure.

II. The Importance of Head Start for Parent Voices Oakland's Membership

18. The Head Start program serves hundreds of children across 15 locations in Oakland and is particularly vital to PVO's parent and caregiver members, many of whom rely on Head Start for high-quality and equitable early education, healthcare, healthy and nutritious meals, and other services.

19. The Head Start program also enables PVO's parent and caregiver members to work, attend school or vocational training programs, go to medical appointments and treatment, and otherwise take care of and provide for their families. Without access to Head Start, many of our members would lose their jobs, be forced to reduce their work hours, and/or drop out of educational and training programs.

20. Access to Head Start is especially vital to PVO members in light of the staggering costs of childcare in the Bay Area. Over the past four years, the average cost of childcare in the Bay Area has increased by 40 to 50 percent.

21. PVO engages with about 3,500 individuals through its listserv and other means of participation, including mothers and caregivers, childcare providers, and other community members dedicated to increasing access to childcare in the Bay Area and in the state of California. As discussed above, PVO's membership includes parents and caregivers in Oakland and the surrounding Bay Area, including parents and caregivers of children who are currently enrolled in Head Start programs. PVO's membership is multi-racial, multi-lingual, and multi-generational. PVO's members include Black families, Indigenous families, and other families of color; low-income families and families experiencing housing insecurity and homelessness; families with children in foster care; families with members who are immigrants; families with members with limited English proficiency, including monolingual Spanish speakers, and/or who are bilingual or multilingual; families who live in urban communities; and families with members who have disabilities.

22. Many PVO members are and/or have family members who are immigrants, have limited English proficiency, and/or are bilingual or multilingual. Many of these members rely heavily on the culturally and linguistically appropriate services and resources provided by Head Start programs, such as dual-language curriculum and educational materials, interpretation services during meetings and events, translated books and take-home materials, and early language development. Such resources and services are vital to ensuring adequate access to Head Start programs and services, a strong connection and partnership between home and school, effective communication with parents and caregivers about children's learning and development, and children's early language development in both English and their home language.

23. PVO also has members who have children with disabilities and/or developmental needs. Many of these members rely on Head Start for its comprehensive disability-related supports and services, including its services to help these families navigate and access the services they need.

24. PVO also has members who have children experiencing homelessness and/or housing insecurity. Many of these members rely on Head Start to provide their children with a safe, stable, and consistent environment to spend their days and develop social, emotional, and other skills. Homelessness is distinctly traumatic for families, and having access to Head Start means that young children have access to behavioral health, nutrition, and other developmental services, as well as early education. These services have an impact that can mitigate some of the challenges that homelessness and housing insecurity present.

III. Defendants' Attacks on Head Start Will Cause Harm to Parent Voices Oakland and Its Parent and Caregiver Members.

a. Defendants' Attacks on Head Start

25. I am aware that on January 20, 2025, President Trump issued an Executive Order targeting diversity, equity, and inclusion ("DEI") initiatives, entitled "Ending Radical

1 and Wasteful Government DEI Programs and Preferencing” (“January 20 Anti-DEI Order”).
2 The January 20 Anti-DEI Order instructed each federal agency to “terminate, to the maximum
3 extent allowed by law, . . . ‘equity’ actions, initiatives, or agencies, ‘equity-related’ grants or
4 contracts; and all DEI or DEIA performance requirements for employees, contractors, or
5 agencies.”

6 26. I am also aware that on January 21, 2025, President Trump issued Executive
7 Order 14173, titled “Ending Illegal Discrimination and Restoring Merit-Based Opportunity,”
8 which requires federal contractors and grantees to certify that they do not operate “illegal” DEI
9 agencies and to comply with federal discrimination laws for purposes of the False Claims Act.

10 27. I am further aware that on March 14, 2025, Defendants informed all Head Start
11 agencies that the Office of Head Start “will not approve the use of federal funding for any
12 training and technical assistance (TTA) or other program expenditures that promote or take
13 part in diversity, equity, and inclusion (DEI) initiatives. This includes expenditures for services
14 provided by contractors or vendors.”

15 28. I am aware that on April 1, 2025, the U.S. Department of Health and Human
16 Services (“HHS”) closed half of its regional offices and laid off those staff, which has impacted
17 Head State agencies across the country. I am further aware that Head Start agencies across the
18 country have experienced problems accessing their federal funding.

19 29. I am aware that on or around April 10, 2025, the Office of Management and
20 Budget issued a memorandum about the 2026 HHS discretionary budget, which indicated that
21 Head Start would be eliminated.

22 30. I also am aware that on April 16, 2025, HHS imposed a requirement for Head
23 Start agencies to certify that “they do not, and will not during the term of this financial
24 assistance award, operate any programs that advance or promote DEI, DEIA, or discriminatory
25 equity ideology in violation of Federal anti-discrimination laws.” I further understand that
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1 noncompliance with this requirement may result in termination of Head Start programs, and
2 civil and criminal penalties.

3 31. I understand that these Executive Orders and agency actions may be in conflict
4 with the rules governing the Head Start Act programs, which I understand require Head Start
5 agencies to meet the “diverse needs” of the populations that they serve, including through
6 providing programs and services designed to support the needs of the community. I further
7 understand that those programs and services include linguistically and culturally appropriate
8 services, inclusive and accessible services for children with disabilities, and services for
9 children experiencing homelessness and children in foster care, as well as outreach to diverse
10 families and involvement of parents in the design and implementation of Head Start
11 programs.

12 32. As a result of Defendants’ attacks on Head Start, parents and caregivers in
13 Oakland and the surrounding Bay area, including PVO’s members, face major threats and
14 uncertainty as to whether they will lose access to the Head Start programs that their children
15 and families rely on for early education, healthcare, healthy meals, childcare, and other
16 services.

17 33. Given the diverse backgrounds and needs of PVO’s membership, Head Start’s
18 provision of these programs and services are especially important to our parent and caregiver
19 members for the reasons below.

20 b. Loss of Culturally and Linguistically Appropriate Programs and Services.

21 34. As discussed above, many of PVO’s parent and caregiver members have
22 families with members who are immigrants, as well as members who have limited English
23 proficiency and/or are bilingual or multilingual. Many of our members rely on Head Start’s
24 provision of culturally and linguistically appropriate programs and services to ensure that
25 children who have limited English proficiency and/or who are bilingual or multilingual have
26 equitable access to early education and are able to participate fully in the programs and
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1 services. These services help to ensure that these children feel welcome and included in the
2 classroom and contribute to positive self-image and sense of identity.

3 35. Many of our members also rely on Head Start's provision of these programs
4 and services to bridge the divide between home and school, and to make sure that they have
5 the ability to be involved and engaged in their children's education and care. For example, the
6 availability of bilingual staff and interpretation services helps to support communication
7 between Head Start staff and families, especially during parent-teacher conferences, meetings,
8 and events. Take-home materials in other languages also help to strengthen the connection
9 between home and school and to allow parents and caregivers to be involved and engaged in
10 their children's learning.

11 36. Without access to culturally and linguistically appropriate services, many of our
12 parent and caregiver members with limited English proficiency would not be able to be
13 involved or play an active role in their children's education and learning. For example, our
14 members with limited English proficiency would not be able to learn about any issues that their
15 children are experiencing in the classroom, such as physical, cognitive, or developmental
16 delays where early intervention is especially important. They would not be able to learn and
17 communicate about problems that come up in their Head Start classrooms, such as difficulty
18 with potty-training, allergic reactions to new foods, illnesses, injuries, or even medical
19 emergencies.

20 37. Losing access to culturally and linguistically appropriate services would create
21 barriers to our members' ability to track the progress of and participate in their children's
22 learning and education, or to celebrate milestones in their children's lives that happen in the
23 classroom, such as taking first steps or saying first words and sentences. Our members with
24 limited English proficiency would not be able to share in those moments without access to
25 culturally and linguistically appropriate services.

1 38. Loss of these services would further interfere with our members' ability to make
2 sure that their children are accessing the interventions, supports, and care that they need inside
3 and outside the classroom. This also would create a divide between home and school, have a
4 negative impact on family dynamics and relationships, and even lead to negative impacts on
5 our members' sense of self-identity and self-worth.

6 c. Loss of Access to Inclusive Services for Children with Disabilities

7 39. As discussed above, many of PVO's parent and caregiver members have
8 children with disabilities and/or developmental needs. Many of these members rely on Head
9 Start's inclusive and accessible programs and disability-related services to make sure that their
10 children can succeed in classroom and beyond.

11 40. Loss of Head Start would deprive our members and their families of the
12 disability-related services and supports that they need. Loss of these services also would have
13 a negative impact on their readiness for kindergarten and the education opportunities that they
14 are able to achieve. Similarly, not having these supports for children with disabilities would
15 severely disrupt parents' ability to provide for their families, as they will be forced to choose
16 between caregiving and employment with little support.

17 d. Loss of Access to Services for Children Experiencing Homelessness

18 41. As discussed above, many of PVO's parent and caregiver members have
19 children who are experiencing homelessness and/or housing insecurity. Many of these
20 members rely on Head Start for access to a safe and consistent environment for their children
21 to spend the days, learn, receive healthcare, and connect with other supports and services.
22 Losing access to Head Start would mean that young children lose access to education, health,
23 nutrition, and other developmental services that they need and that can mitigate some of the
24 challenges that homelessness presents.

25 42. Many of our members, especially those who are experiencing housing
26 insecurity and homelessness, rely on Head Start to ensure that their children have access to
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1 healthy and nutritious meals and snacks, such as fruits and vegetables, that they can't afford to
2 buy on their own. Losing access to these services would mean that many of these members and
3 their children would go without regular and nutritious meals.

4 e. Harms to PVO's Mission and Resources

5 43. By threatening access to early education and childcare by dismantling Head
6 Start programs, Defendants' actions directly undermine PVO's mission and activities to
7 increase access to high-quality, affordable, and equitable childcare for parents and caregivers
8 in Oakland and the surrounding Bay Area. Defendants' attacks on Head Start would remove
9 critical childcare and early education resources from PVO's community and members, which
10 is at the heart of PVO's mission and goals.

11 44. Moreover, Defendants' actions undermine PVO's ability to fulfill its mission
12 and conduct its activities by jeopardizing our parent and caregiver members' access to
13 childcare and, in turn, preventing members from being able to attend, participate in, and
14 otherwise engage in PVO's work, meetings, activities, and programming.

15 45. In addition, PVO has been and would continue to be forced to divert its limited
16 resources away from its core activities of organizing parent and caregivers toward addressing
17 the harms of Defendants' actions on its members. Rather than continue to spend its resources
18 on organizing and building leadership among its parent and caregiver members, PVO would
19 be forced to divert its limited financial and staffing resources toward addressing the gaps in
20 resources caused by loss of Head Start services and programs.

21 46. Because of Defendants' attacks on Head Start, PVO has been forced to
22 temporarily suspend our work on health equity measures, including our work to ensure that
23 children and families in Alameda County and the state of California have access to emergency
24 healthcare services and safety nets, to dedicate more resources to addressing the impending
25 closure of Head Start programs. For example, PVO has been forced to dedicate its limited
26 resources, including staff time, toward research on Head Start programs, messaging and
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1 communications to amplify parents' needs, and public education and outreach to parents and
2 caregivers about Defendants' attacks on Head Start.

3 I declare under penalty of perjury that the foregoing is true and correct.

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5 Dated: May 16, 2025

/s/ Clarissa Doutherd

6 Clarissa Doutherd
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