

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
FAMILY FORWARD
OREGON MEMBER B IN
SUPPORT OF PLAINTIFFS'
MOTION FOR A
PRELIMINARY
INJUNCTION**

NOTE ON MOTION
CALENDAR:

JUNE 13, 2025

1 I, Member B, 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 to be a
4 witness in this case.

5 2. I am a childcare provider member of Family Forward Oregon, a non-profit
6 organization that organizes and empowers Oregon mothers and caregivers to fight for racial,
7 gender, and economic justice, including access to affordable and quality childcare for all
8 Oregon families.

9 3. I am a Head Start teacher for a program based in Oregon.

10 4. I lead a full-day Head Start classroom, from 8:15 a.m. until 2:45 p.m., and teach
11 18 children between the ages of three and five years old.

12 5. The majority of my students require extra support for developmental delays,
13 including early interventions, individualized learning plans, speech therapy, and other services.
14 Access to Head Start has been important to ensure that these students have access to early
15 intervention services that will set them up for long-term success and make sure they are ready
16 for school.

17 6. I am one of few fortunate educators who has both an assistant teacher and a
18 classroom aide because it is difficult to retain aides given low salaries for childcare workers.
19 Having a classroom aide allows us to better serve our students and their unique needs.

20 7. Because my classroom consists of students from different socioeconomic,
21 racial, disability, language, and other backgrounds, I don't know how I would run a classroom
22 without addressing the needs of each of these students in my day-to-day teaching. For example,
23 we do work trainings around trauma-informed care, supporting literacy for neurodivergent
24 kids, adapting curriculum for kids who cannot speak or have social or emotional delays or
25 autism. Everything we do would have a "DEI" component because we work with people of all
26 backgrounds and abilities. If we have a training the program pays for that covers these topics,
27

1 and we are in violation, I worry we would face budget consequences. At the same time, we
2 need these trainings to serve our students and families.

3 8. Twelve of 18 of my students have an IFSP, meaning they have developmental
4 delays in multiple categories—behavior, speech, autism, fine motor skills, or some
5 combination of those. They receive extra services including an occupational therapist that
6 comes once a month for one student, a speech therapist who comes once a week for 5-6
7 students, and a disability specialist who regularly oversees the majority of my caseload and
8 coordinates with the occupational therapist and speech and language pathologist to get the kids
9 what they need. If those services are considered “DEI” and are part of the DEI cuts, that’s
10 critical support that two-thirds of my class need to function and support that I need as a teacher
11 to do my job effectively. If these professionals were not there to support me, I would quickly
12 feel burnt out. We would lose a lot of other teachers who would not feel equipped to handle
13 their classrooms without this support.

14 9. In order to support our families following ICE raids in our area, we recently
15 put know-your-rights information in different languages in the building for families and staff
16 to take, and had an all staff meeting regarding protecting our families and students. It seems
17 we would get in trouble for this under the new policies.

18 10. Leading a Head Start classroom involves a lot of work by childcare providers.
19 As a Head Start teacher, I teach a full curriculum to ensure children meet their educational
20 goals. In my classroom, students are learning numbers and letters and even starting to read.
21 Access to Head Start helps these students learn and develop skills to prepare them for school.

22 11. As a Head Start teacher, I also teach life and social skills. We potty-train
23 students. We document their progress and accommodate their special needs. That includes
24 monitoring their physical, cognitive, social, emotional, and language development, and making
25 sure that they are prepared to succeed in school and in life.

26 12. Not only are we tasked with educating students, but we also nurture them.
27 Sometimes children come in with no socks on their feet or wearing the same clothes as the day

1 before. At my program, we operate a community-donation based clothing closet where, when
2 I notice a child is lacking clean clothes or missing socks under their sneakers, I go into the
3 closet and get them what they need.

4 13. I have cleaned children with wipes because they have not been bathed at home.
5 I pour every ounce of love I have into caring for these children, trying to be the teacher I would
6 want my child to have. Access to Head Start is important to making sure these children and
7 their families, especially those who are low-income or may be experiencing homelessness,
8 receive the care and support that they need and deserve.

9 14. My ability to provide resources like these clothes is enabled by my program
10 which runs a community donations closet and allocates a certain amount of funds to support
11 families in need. We have a family advocate who teachers can request to, for example, order a
12 bag of clothes in the children's size. During my family conferences at the beginning of the
13 year, I asked my families if they needed any support and connected them with our family
14 advocate to get clothes, diapers, or shoes if needed. These sort of wraparound services, which
15 some might label "DEI," are key to making our program successful and getting our kids what
16 they need.

17 15. As a mother and early childhood educator, I would do anything for my kids—
18 both my own and the ones I teach. I love my students and my job, but it is becoming hard to
19 stay because of the crisis in childcare system, including the uncertainty and instability caused
20 by the threats to the Head Start program.

21 16. Head Start teachers have to obtain the highest level of training to qualify for the
22 position. We either need to qualify for Step 10 of Oregon's early childhood education registry
23 or have a bachelor's degree in a field related to early childhood education. I have a four-year
24 degree in child, youth, and family studies to qualify for my teaching job. I went to school for
25 four years for this job.

26 17. I understand that Head Start programs are under threat because the Trump
27 Administration wants to eliminate them because it is against "DEI" programs. Our program

1 receives 20% of its funds from the federal government's Head Start grants and 80% from the
2 state of Oregon. However, about 80% of our program's budget is wages for teachers and staff,
3 so if we lose Head Start funding, layoffs will follow because we will not have the funds to
4 cover operating costs and wages. That also means we will also have to reduce enrollment,
5 leaving children and families without childcare.

6 18. Losing Head Start would mean that I may lose my job and my means of
7 supporting myself and my family even given the support of my partner. It would be really hard
8 to find a job with a comparable wage, and I am already working an extra job. I am not sure
9 how I would be able to find a job that works with my kids' schedule and pays comparable
10 wages elsewhere. It would be a mess. This would create significant emotional and financial
11 stress for myself and my family, and make it more difficult for me to pay our bills.

12 19. We have a ton of single moms and parents who work at the agency who would
13 be in a similarly precarious financial position if we were to lose Head Start funding.

14 20. If early childhood educators and care providers are forced to limit or cut Head
15 Start programs, the kids will directly feel the consequences. Without access to Head Start,
16 children will struggle, will experience disruptions in their education and routines at a critical
17 time in their development, and may even begin acting out because they are no longer getting
18 the resources and supports that they need. As a result of the lack of financial support and
19 staffing, many childcare providers are already experiencing burnout. The uncertainty and
20 instability caused by the threats to Head Start might push teachers with the needed
21 qualifications and experience to leave. When we lose teachers and funding, our children's
22 education will be hurt, and families will feel the effects. Childcare is the work that makes all
23 other work happen.

24 21. Despite all the threats to Head Start, childcare needs are not going anywhere.
25 Childcare in Oregon is more expensive than college, so working parents need Head Start.
26 Across the state, over 8,700 families are on the waitlist for Head Start services. The massive
27 demand shows that we need to expand access to Head Start, not to limit it.

22. To qualify for full-day Head Start, parents must be working or in school full time. Qualifying families are facing economic hurdles and need the care that my classroom and others like it provide. Taking childcare and education away from them and their kids is unfair to them and only continues the cycle of poverty.

23. They say it takes a village to raise a child, and this is no different. I hope that people across the country can see that childcare should not go ignored. In order to maintain a sustainable childcare system and raise healthy and well-adjusted children, we need prepared, supported workers in the classroom. We need federal government officials to consider the wellbeing of children, families, and teachers, and advance funding.

24. No one is unaffected when we lose access to Head Start. The ripple effects harm children themselves, teachers like me, parents and families who rely on classrooms like mine, their employers, and so on. We must fight for the childcare system that our families, kids, and providers need. Our children are the most important things in our lives. We must take access to childcare and early education seriously.

25. I am submitting this declaration anonymously, because I fear retaliation from the current administration, as well as harassment and threats from members of the public, for challenging the policies and practices of the Trump administration related to the Anti-DEI and Anti-Immigration Executive Orders.

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

Dated: May 15, 2025

