

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  
CANDICE VICKERS IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR A  
PRELIMINARY  
INJUNCTION**

NOTE ON MOTION  
CALENDAR:

JUNE 13, 2025

1 I, Candice Vickers, 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. Family Forward Oregon's Mission and Activities**

6 2. I am the Executive Director of Family Forward Oregon ("FFO"). I have served  
7 as the Executive Director since 2023. Prior to serving as FFO's Executive Director, I advocated  
8 for and served children and families who have been historically marginalized and systemically  
9 denied opportunities to thrive for over 15 years. Specifically, I served as the Executive Director  
10 of Student and Family Services at the Reynolds School District in Gresham, Oregon, where I  
11 supervised support services related to students, families, and the community. I also have served  
12 as the Assistant Director/School Director for University Prep Schools in Detroit, Michigan;  
13 Principal and Assistant Director of Student Services at Centennial School District in Portland,  
14 Oregon; Assistant Principal and teacher on School Climate and Humanities/Special Education  
15 at Portland Public Schools in Oregon; and a teacher of English/Language Arts at other Oregon  
16 schools.

17 3. In addition to my professional background working as an educator, I am a Black  
18 mother of two children and have personal knowledge of and experience with early education  
19 and supports for young children.

20 4. FFO is a statewide non-profit, non-partisan organization led by and comprised  
21 of Oregon mothers and caregivers fighting for gender, economic, and racial justice, and for  
22 access to high-quality, affordable, and culturally relevant childcare. FFO's membership is  
23 comprised of Oregon mothers and caregivers across intersecting identities of race, class,  
24 sexuality, gender identity, immigration status, language, and disability, including parents and  
25 family members of children currently enrolled in Head Start programs. FFO's membership  
26  
27

1 also includes Oregon childcare providers, including current Head Start teachers and staff  
2 members.

3         5.       The mission of FFO is to work collectively with Oregon mothers and caregivers  
4 to organize, educate, and advocate for care systems that ensure that families obtain economic  
5 stability and power, and where the labor of caregiving is seen and valued. To achieve these  
6 goals, FFO builds on the collective power of Oregon mothers and caregivers through  
7 community organizing, leadership development, civic engagement, education, and advocacy.  
8 FFO offers many opportunities for training, development, and participation to its members,  
9 including, but not limited to, monthly action team meetings; direct actions, including an annual  
10 Day Without Child Care to draw attention to the childcare crisis; care summits; and a statewide  
11 parent cohort, comprised of parent members from communities most impacted by the childcare  
12 crisis in Oregon.

13         6.       Diversity, equity, inclusion, and accessibility are central to our work and to our  
14 membership. FFO believes that solutions related to the childcare system must actually work  
15 and be accessible to everyone, including those who are the most vulnerable and underserved.  
16 FFO believes that, when we find solutions that are based on equity and dignity for those of us  
17 most impacted by harmful conditions, we create benefits and equity for all of us.

18         7.       FFO receives the majority of its funding from grants and individual  
19 contributions.

20         8.       FFO also co-leads the Child Care for Oregon coalition of nonprofit  
21 organizations, labor unions, community advocates, parents, caregivers, and providers working  
22 to build a universal and publicly-funded childcare system that is community-led, equitable,  
23 affordable, culturally relevant, inclusive, developmentally appropriate, and safe. The coalition  
24 represents constituencies that are disproportionately impacted by Oregon's disconnected and  
25 under-resourced childcare system, including women, parents, and childcare providers who are  
26  
27

1 Black, Indigenous, Asian, refugees, immigrants, Latinx, rural area residents, and/or low-  
2 income.

3 9. Through the Child Care for Oregon coalition, FFO and its partner organizations  
4 provide opportunities for parents, childcare providers, and community members to ensure that  
5 their perspectives are included in campaigns fighting for increased access to and funding for  
6 childcare. For example, in 2024, the Child Care for Oregon coalition's organizing  
7 subcommittee planned an activist summit where 35 parents, providers, and community  
8 members came together to share their lived experiences and build advocacy skills.

9 10. FFO also has a sister organization, known as Family Forward Action, which  
10 works with mothers and caregivers to advocate for stronger statewide programs and laws to  
11 support the economic well-being and power of Oregon families.

12 11. FFO maintains an organizational structure designed to center the voices of  
13 Oregon mothers and caregivers, and particularly those who have been most impacted by racial,  
14 gender, and class disparities in care systems, in its internal decision-making processes. This  
15 structure is designed to ensure that the lived experiences of parents and caregivers, particularly  
16 those from vulnerable and marginalized backgrounds, guide FFO's priorities and strategic  
17 decisions. FFO's Board of Directors also is comprised of parents, caregivers, and community  
18 members who represent the communities that FFO serves.

19 12. In my role as Executive Director of FFO, I am responsible for developing,  
20 managing, and leading FFO's strategic goals and operations; developing and overseeing  
21 fundraising strategies for the organization; serving as the primary liaison between FFO's Board  
22 of Directors and staff members, and otherwise supporting the Board in its functions; fostering  
23 strategic partnerships and coalitions with parents and caregivers, childcare providers, early  
24 educators, Head Start agencies, labor unions, and policymakers; and otherwise leading and  
25 directing organizational operations and management of staff and volunteers.

13. FFO also has 14 staff members. In addition to my position, FFO employs a Deputy Director of Movement Building; Willamette Valley Regional Organizer; Bilingual Statewide Organizer; Regional Organizing Director for Portland Metro; Southern Oregon Regional Organizer; Director of Human Resources and Operations; Operations Coordinator; Administrative Manager; Development Director; Grant Manager; Communications Director; Legislative Coordinator; Political Director; and Advocacy Manager.

## **II. The Importance of Head Start for Family Forward Oregon's Membership**

14. The Head Start program is critical for low-income children and their families in Oregon. According to the Annie E. Casey Foundation's Kids Count Data Center, in 2023, about 69 percent of children in Oregon under the age of six years had all available parents in the workforce, meaning that they require some form of childcare. Moreover, according to Oregon Preschool Development Grant's Statewide Household Survey Results in 2022, about 41 percent of Oregon families have experienced challenges finding childcare that negatively impacted their employment.

15. Our members' need for early education and childcare already exceeds the resources and programs available for such services. According to the First Five Years Fund, in Oregon, over 18,400 children between the ages of zero and five are eligible for the Head Start program. However, only about 12,061—or roughly 65 percent—are served by Head Start programs. Moreover, according to the Oregon Department of Early Learning and Care, about 11,300 Oregon families are currently on a waitlist for childcare programs.

16. The costs of childcare in Oregon are staggering. Many of our parent and caregiver members struggle to afford the childcare necessary to simply get to work, let alone advance in their careers with education and vocational training, access healthcare and medical appointments, or otherwise take care of themselves and their loved ones.

1           17. Access to Head Start enables many of our parent and caregiver members to  
2 work, attend school, enroll in vocational training programs, go to health and medical  
3 appointments and treatment, and otherwise provide for their families.

4           18. FFO engages with over 15,000 individuals through its listserv and other means  
5 of participation, including mothers and caregivers, childcare providers, and other community  
6 members who are dedicated to increasing access to childcare in Oregon. FFO's membership  
7 includes many Oregon mothers and caregivers, including parents and caregivers of children  
8 who are currently enrolled in Head Start programs.

9           19. FFO's members include Black families, Indigenous families, and other families  
10 of color; low-income families and families experiencing housing insecurity; families with  
11 children in foster care; families with members who are immigrants; families with members  
12 with limited English proficiency, including monolingual Spanish speakers; families with  
13 members who are bilingual or multilingual; families who live in rural communities; families  
14 who live in urban communities; and families with members who have disabilities.

15           20. In 2025, FFO organized a care summit to provide leadership development and  
16 engagement opportunities for its parent, caregiver, and childcare provider members of diverse  
17 backgrounds and experiences. Of over 60 members who attended the care summit, 75 percent  
18 identified as Black, Indigenous, or other people of color; more than 50 percent identified as  
19 monolingual or bilingual Spanish speakers; and 16 percent were from rural communities. The  
20 care summit specifically focused on engaging and mobilizing members around access to  
21 childcare, guaranteed income, access to mental healthcare, and revenue dedicated to childcare  
22 services.

23           21. FFO also organizes a statewide parent cohort comprised of five parents from  
24 communities most impacted by the childcare crisis in Oregon, including women of color,  
25 parents with disabilities, parents of children with disabilities, and low-income parents.

22. Many FFO members are and/or have family members who are immigrants, have limited English proficiency (including monolingual Spanish speakers), and/or are bilingual or multilingual, including members who rely on the culturally and linguistically appropriate services and resources provided by Head Start programs. To support these members, FFO has a bilingual Spanish/English organizing program to engage and educate these members on how the government works, particularly related to access to childcare and early education services. FFO also employs a Bilingual Statewide Organizer to support these members and ensure that they can participate in FFO's summits, monthly action team meetings, and other efforts.

23. FFO also has members who have children with disabilities. Many of these members rely on Head Start for access to early interventions and supports, accessible and inclusive classrooms, resources, and other services to ensure the health and wellbeing of their children. Head Start is so important for low-income children and their families, because Head Start provides for early identification and intervention of developmental disabilities that would otherwise not take place until well into their first or second year in the K-12 school system. A delay of even just one year in identification and intervention for children with developmental disabilities can have long-term negative impacts on educational and health outcomes. Moreover, Head Start supports families of children with disabilities through the IFSP process and in navigating health insurance to obtain supportive equipment and adaptive devices—which is especially critical for low-income children and their families who may not otherwise be able to afford such equipment and devices.

### **III. Defendants' Attacks on Head Start and Resulting Harms to Family Forward Oregon and Its Members**

#### **a. Defendants' Attacks on Head Start**

24. I am aware that on January 20, 2025, President Trump issued an Executive Order targeting diversity, equity, and inclusion ("DEI") initiatives, entitled "Ending Radical and Wasteful Government DEI Programs and Preferencing" ("January 20 Anti-DEI Order").

1 The January 20 Anti-DEI Order instructed each federal agency to “terminate, to the maximum  
2 extent allowed by law, . . . ‘equity’ actions, initiatives, or agencies, ‘equity-related’ grants or  
3 contracts; and all DEI or DEIA performance requirements for employees, contractors, or  
4 agencies.” I am also aware that on January 21, 2025, President Trump issued Executive Order  
5 14173, titled “Ending Illegal Discrimination and Restoring Merit-Based Opportunity,” which  
6 requires federal contractors and grantees to certify that they do not operate “illegal” DEI  
7 agencies and to comply with federal discrimination laws for purposes of the False Claims Act.

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

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

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

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

24 29. I also am aware that on April 16, 2025, HHS imposed a requirement for Head  
25 Start agencies to certify that “they do not, and will not during the term of this financial  
26 assistance award, operate any programs that advance or promote DEI, DEIA, or discriminatory  
27



1 equity ideology in violation of Federal anti-discrimination laws.” I further understand that  
2 noncompliance with this requirement may result in civil and criminal penalties.

3 30. I understand that the Head Start Act and its implementing regulations require  
4 Head Start agencies to meet the “diverse needs” of the populations that they serve, including  
5 through providing programs and services designed to support the needs of the community. I  
6 further understand that those programs and services include linguistically and culturally  
7 appropriate services, inclusive and accessible services for children with disabilities, and  
8 services for children experiencing homelessness and children in foster care, as well as outreach  
9 to diverse families and involvement of parents in the design and implementation of Head Start  
10 programs.

11 b. Harms for Family Forward Oregon’s Parent and Caregiver Members

12 31. Because of Defendants’ actions, Oregon mothers, caregivers, and childcare  
13 providers—including FFO’s members—face significant threats and uncertainty as to whether  
14 they will soon lose access to the Head Start programs on which they rely for early education,  
15 childcare, healthcare, healthy meals, and other critical services.

16 32. Without access to Head Start, many of these children and their families would  
17 lose access to affordable childcare options. As a result, many of our members would be forced  
18 to miss work, lose their jobs, disenroll from school or vocational training programs, and  
19 otherwise be unable to provide for and take care of themselves and their families. Loss of  
20 childcare access would have further impacts on our members’ ability to pay their rent, utility  
21 bills, grocery bills, and other expenses, and could lead to housing insecurity and homelessness  
22 for many members. It would also mean that our members would face increased barriers to  
23 getting to medical and healthcare appointments and otherwise accessing medical treatment due  
24 to lack of childcare.

25 33. Head Start programs also provide comprehensive health services, including  
26 medical, dental, and mental healthcare, to children and their families. In particular, Head Start  
27

1 provides mental health services to children and their families, helping to address issues such  
2 as trauma, anxiety, and depression. Loss of access to Head Start would mean that these services  
3 would no longer be available to our members, leaving many families and children without  
4 access to essential healthcare and mental health supports.

5 34. Head Start also provides regular, healthy, and nutritious meals and snacks to  
6 children, helping to ensure that they receive the nutrition that they need to grow and develop.  
7 Without Head Start, many of our members would struggle to provide the same level of healthy  
8 and nutritious meals for their children due to financial issues and the rising costs of groceries.

9 35. For many of our members, their children began to try and enjoy eating healthy  
10 foods, such as vegetables, fruits, and whole grains, after being introduced to them in their Head  
11 Start programs and watching their teachers and peers try those foods in class. Losing access to  
12 Head Start would disrupt these healthy eating patterns and practices at a critical time in their  
13 early childhood development.

14 36. Head Start also encourages our parent and caregiver members to take an active  
15 role in their children's education and development through various parent involvement  
16 opportunities, such as volunteering in the classroom, attending parent-teacher conferences, and  
17 participating in decision-making. Head Start also provides parent education and training  
18 opportunities, helping our members to develop important parenting, education, and job  
19 readiness skills. Losing Head Start would mean that these opportunities would no longer be  
20 available to our members and could negatively impact parent-child relationships.

21 37. Many Head Start programs also provide transportation services to help families  
22 get their children to and from program sites. Without Head Start, many families would struggle  
23 to find alternative transportation options.

24 38. Head Start also provides support services to help families navigate and  
25 overcome challenges and achieve economic stability, including through assistance with  
26  
27

1 housing, employment, and community resources. Without Head Start, many of our members  
2 would lose access to these critical support services.

3 39. Given the diverse backgrounds and needs of FFO's membership, Head Start's  
4 provision of these programs and services are especially important to our parent and caregiver  
5 and childcare provider members—and the loss of these programs and services would cause  
6 significant harm to them for the reasons below.

7 40. As discussed above, many of our parent and caregiver members have families  
8 with members who are immigrants, members who have limited English proficiency (including  
9 monolingual Spanish speakers), and members who are bilingual or multilingual. Many of our  
10 members rely on Head Start's culturally and linguistically appropriate programs and services  
11 to ensure that children have equitable access to early education, can participate fully in the  
12 programs and services, and feel welcome in the classroom.

13 41. Many of our members rely on Head Start's provision of culturally and  
14 linguistically appropriate services so that they can be involved and engaged in their children's  
15 learning. For example, many of our members rely on interpretation services, bilingual staff,  
16 and translated materials to stay updated on their children's learning and progress in class, and  
17 so they can stay informed about any issues or concerns that come up in the classroom.

18 42. Without access to these culturally and linguistically appropriate services, many  
19 of our parent and caregiver members would not be able to play an active role in their children's  
20 learning and education or to learn about when their children are experiencing difficulties or  
21 delays. These barriers would damage parent-child relationships and our members' ability to  
22 best support their children, particularly when there are issues that require at-home and/or long-  
23 term interventions. Moreover, the loss of these services would create greater separation  
24 between home and school, which lead to negative consequences on family dynamics, parent-  
25 child relationships, and our members' sense of identity and self-worth. Losing access to these  
26  
27

1 services would force many members to disenroll from the Head Start program to avoid these  
2 harms.

3 43. In addition, many of FFO's parent and caregiver members have children with  
4 disabilities and who rely on Head Start's programs and services to make sure that their children  
5 receive the screenings, interventions, supports, and resources that they need to become ready  
6 for school. For many of our members, Head Start teachers helped to first identify that their  
7 children were experiencing delays and required Individualized Family Service Plans ("IFSPs")  
8 and other supports to participate in the classroom. Access to IFSP prior to starting school is  
9 critical for young children's future success in schools, especially to ensure that any  
10 developmental delays are effectively addressed during early childhood.

11 44. Without Head Start, many of our members would lose access to IFSPs, speech  
12 therapy, occupational therapy, physical therapy, and other key supports that their children need  
13 and that they would not be able to otherwise obtain without the program. Losing access to these  
14 services, especially at such an early age, would be significantly disruptive to children's  
15 development and overall well-being, and could cause many children to regress in their  
16 communication, social, fine motor, and other key skills that they have developed through Head  
17 Start programs.

18 c. Harms to Family Forward Oregon

19 45. In addition to the harms on our parent and caregiver members, Defendants'  
20 actions have harmed and would continue to harm FFO by frustrating its mission and forcing  
21 FFO to divert its limited resources.

22 46. The Head Start program is a vital component of FFO's mission and efforts to  
23 promote economic inclusion and secure broader access to high-quality, equitable, and  
24 culturally relevant childcare for low-income mothers and families in Oregon. Eliminating the  
25 Head Start program—or any of the components within Head Start that serve the diverse needs  
26 of our members—would not only harm our members but also directly undermine FFO's  
27

1 mission and efforts to increase access to childcare and early childhood education across the  
2 state. It also would perpetuate the undervaluing of care and caregivers, exacerbate the existing  
3 childcare crisis, and further entrench systemic disparities in health, educational, and economic  
4 outcomes for families of color and other vulnerable and underserved families—all of which  
5 are conditions that are central to FFO's mission.

6 47. Eliminating Head Start or any of its programs' components would also directly  
7 harm and interfere with FFO's planned activities to organize and empower parent and caregiver  
8 members through monthly membership meetings, direct actions, summits, cohorts, and other  
9 events. Because many of our members rely on Head Start for childcare services, losing access  
10 to Head Start would limit our members' ability to attend, participate in, or otherwise engage in  
11 our programs and activities—thereby directly interfering with our ability to conduct our work.

12 48. Defendants' attacks would even jeopardize the attendance of our members with  
13 children who are not currently enrolled in Head Start, as parent and caregivers who lost access  
14 to Head Start services would be forced to seek other options and compete with other families  
15 for the remaining limited childcare providers and facilities in their communities. The already-  
16 limited options would become even more limited, and would not be able to meet the ballooning  
17 need for childcare services in the absence of Head Start.

18 49. Head Start childcare providers also are key members of our leadership  
19 development and organizing efforts. If these providers' programs were eliminated and/or  
20 restricted, FFO would lose a large portion of those we work with (and our membership) in  
21 Oregon. This would be harmful to our existing campaigns and activities that rely on  
22 collaboration and coalition-building with childcare providers to maximize our impact,  
23 knowledge, and resources to advocate for greater access to childcare.

24 50. In addition, Head Start programs and providers are a major source of learning  
25 for FFO and its parent and caregiver members, as well as other childcare providers with whom  
26 we work. If Head Start programs are eliminated and/or restricted, it would significantly hamper  
27

1 our ability to provide education to parents and families about the work they do, how best to  
2 support their children (including children with special needs), and how best to collaborate with  
3 providers to maximize parent and caregiver involvement in childcare programs.

4 51. Critically, conducting these activities and programs are central to our existing  
5 objectives and obligations set forth in FFO's grant agreements. Losing access to Head Start  
6 and/or its programs could jeopardize FFO's ability to satisfy its grant obligations and put FFO  
7 at risk of losing grant funding directly tied to these efforts.

8 52. Elimination of Head Start and/or its programs would negatively impact FFO's  
9 staff capacity and limited resources. Defendants' actions have resulted and would continue to  
10 result in more parents, families, providers, and community partners reaching out to FFO in  
11 crisis and requesting urgent information and navigation assistance under the threat of Head  
12 Start program closures and layoffs. FFO staff will be forced to expend additional time and  
13 resources fielding requests from parent and caregiver members, as well as childcare provider  
14 members, regarding closures of Head Start programs.

15 53. Since Defendants' attacks on Head Start began, FFO has seen an increase in  
16 outreach and requests from parents, caregivers, Head Start teachers, and program  
17 administrators with questions and concerns about whether their programs will continue, having  
18 to reduce staff, and difficulty drawing down their federal funding. Before these attacks began,  
19 while we always had members who are Head Start families or staff, we never needed to devote  
20 staff time or other resources to supporting those families or providers in keeping programs  
21 open and resourced, and families enrolled. Since Defendants' attacks on Head Start began,  
22 FFO hears from two to five families and/or providers per week.

23 54. Moreover, FFO would be forced to divert its limited resources away from its  
24 core activities of organizing parent and caregivers toward addressing the immediate harms of  
25 Defendants' actions on its members. For example, FFO would be forced to expend its limited  
26 financial resources on covering costly childcare services so that its parent and caregiver  
27

1 members can continue to attend and participate in FFO meetings, events, and activities.  
2 Moreover, the elimination of Head Start programs will result in higher costs of childcare  
3 services for FFO and its members due to more limited numbers of providers.

4 55. In addition, because of Defendants' attacks on Head Start, FFO has been forced  
5 to reallocate significant staff time and resources to supporting Head Start families and  
6 providers, away from previously-scheduled and planned programming and campaigns. For  
7 example, FFO has had to reallocate staff time and resources away from previously-scheduled  
8 programming and recruitment for its annual Day Without Child Care action, as well as FFO's  
9 campaign to end the waitlist for Employment Related Day Care in Oregon.

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

11  
12 Dated: May 15, 2025

/s/ Candice Vickers

13 Candice Vickers  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27