

Exhibit 1

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
MARY ROE IN SUPPORT
OF PLAINTIFFS' MOTION
FOR A PRELIMINARY
INJUNCTION**

1 Pursuant to 28 U.S.C. § 1746, I, Mary Roe, hereby declare and state:

2 1. I am over eighteen years old, and I have personal knowledge of the facts set
3 forth below. The information in this declaration is true and correct to the best of my knowledge.
4 If called to testify about them, I could and would be able to do so competently.

5 2. I am the Executive Director of a Head Start agency in Wisconsin (“my Head
6 Start Agency”). I have served as Executive Director since 2015. I have worked in the early
7 childhood education field for 25 years, serving families in two different Head Start agencies
8 and as a consultant.

9 3. I hold a Master’s degree in Social Work and a Bachelor’s degree in Psychology.

10 4. My Head Start Agency provides high-quality early childhood services to
11 approximately 800 underserved children ages 0 to 5 through center based and home visitation
12 programs. Our staff work every day to reach the most vulnerable children and families in our
13 community, and the need for our services is growing. Homelessness is a significant issue in
14 our community, particularly in our enrolled Early Head Start families.

15 5. The Wisconsin Department of Children and Families implements a childcare
16 rating and improvement system called YoungStar, which rates early childhood programs from
17 one to five stars. My Head Start agency is consistently rated 5-stars across all of its Head Start
18 sites, demonstrating our commitment to providing high-quality early childhood services.

19 6. My Head Start Agency has been a provider of Head Start program, and received
20 Head Start grant funding, for over 50 years.

21 7. Since I became Executive Director in 2015, all of my Head Start Agency’s
22 federal reviews have been “gold star,” with no identified non-compliances or deficiencies. My
23 Head Start Agency has never been referred to the Designation Renewal System, and therefore
24 the agency has always qualified for non-competitive grant applications as a program in good
25 standing.

26 8. My Head Start agency operates on a January 1 grant funding cycle, and I
27 submitted our grant application on September 30, 2025. Because my Head Start Agency

1 qualified for a non-competitive grant, we were instructed to follow the instructions for
2 submitting a Baseline Application. This includes submitting a comprehensive budget and an
3 application narrative, in which the program describes a range of updates on its activities, for
4 example, the results of its community needs assessment; details about the services it provides,
5 including services for children with disabilities, mental health services, and services for
6 pregnant women; and strategies for building family and community engagement, including
7 services that are culturally and linguistically responsive to families. A copy of the current Head
8 Start Non-Competitive Grant Application Instructions is attached to this declaration as **Exhibit**
9 **A.**

10 9. On November 19, I received a response to my application via the Head Start
11 Enterprise System (HSES), the online portal operated by the Office of Head Start. A copy of
12 this email is attached to this declaration as **Exhibit B.**

13 10. The email stated that my Head Start Agency's grant application was being
14 returned. In order to have our non-competitive grant processed, we were instructed that we had
15 to remove the following words from the application: "Racism," "Race," "Racial,"
16 "marginalized," "institutional," "historically," "bias," "Equity," "equitable," "diversity,"
17 "diverse," "belonging," "inclusion," "inclusivity," "gender," "chestfeeding," "pregnant
18 people," or "LGBTQIA 25+."

19 11. Shortly after receiving this message via HSES, I was contacted by my Head
20 Start Agency's program specialist. A copy of that email is attached to this declaration as
21 **Exhibit C.**¹

22 12. The program specialist confirmed that my Head Start Agency's grant
23 application was being returned for the removal of particular words and concepts. Attached to
24 the email, the program specialist provided a six-page list of "words to limit or avoid in
25 government documents." *See* Ex. C. This much lengthier list includes additional 197 terms
26

27 ¹ The name of the program specialist has been redacted to protect the privacy of this individual employee.

1 like “advocate,” “accessible,” “at risk,” “barrier,” “BIPOC,” “Black,” “cultural competence,”
2 “disability,” “ethnicity,” “equal opportunity,” “equality,” “expression,” “female,” “gender,”
3 “Hispanic minority,” “immigrants,” “indigenous community,” “inclusive,” “Latinx,” “mental
4 health,” “multicultural,” “Native American,” “socioeconomic,” “tribal,” “underserved,” and
5 “women.”

6 13. My understanding is that these instructions from the Office of Head Start are a
7 continuation of the agency’s efforts to implement the ban on federal funding for so-called DEIA
8 initiatives. My understanding is also that compliance with these instructions is a condition of
9 grant renewal. In other words, if we do not comply, my understanding is that my Head Start
10 Agency’s funding will not be renewed, and we will not be able to run our Head Start program
11 for the 2026 program year. I therefore reviewed my Head Start Agency’s grant application to
12 attempt to comply with these instructions, but compliance is challenging because many of the
13 words on the list are integral to Head Start programming requirements.

14 14. The grant application itself already includes some of these prohibited words in
15 pre-populated text in the HSES submission portal, and application questions specifically
16 request responses that include these words—such as budget line items for mental health and
17 disability services professionals.

18 15. Further, the Application Instructions require us to provide a summary of data
19 from the community needs assessment that includes “demographic variables”—specifically
20 including, for example, the number of children with disabilities. *See* Ex. A at 6. The
21 Application Instructions refer the applicant to 45 C.F.R. § 1302.11(b), which requires that the
22 community assessment must include the following demographic data: race and ethnicity;
23 children with disabilities. § 1302.11(b)(2). But we cannot report this information if we are
24 prohibited from using words like “race,” “ethnicity,” “Black,” “Hispanic,” “Latinx,” “Native
25 American,” “tribal,” and “disability.” Without being able to use these terms, I am unable to
26 accurately describe the results of my Head Start Agency’s community needs assessment, which
27

1 is a foundational part of both the grant application and the development and ongoing
2 improvement of our services.

3 16. The Application Instructions also require our program narrative to report on the
4 services we offer for children with disabilities, including mental health services (Ex. A at 7-8);
5 services for pregnant women via Early Head Start (Ex. A at 9); and strategies to foster family
6 and community engagement via culturally and linguistically responsive services (Ex. A at 8).
7 It is nearly impossible to describe these services without using the words “disability,” “mental
8 health,” “women,” “culturally competent,” “culturally appropriate,” or “culturally
9 responsive”—all banned words and concepts banned. Ex. C.

10 17. Moreover, many of the words included on these lists are used in the Head Start
11 Act and the Head Start Performance Standards to describe key components of our programs.
12 For example, Head Start programs are required to “ensure equitable, inclusive, and accessible
13 service[s]” that reflect the “diverse needs” of our communities. 42 U.S.C. § 9836(d)(2)(L); 45
14 C.F.R. § 1302.11(b). We are required to use demographic data—including race, ethnicity,
15 language, and disability—to inform our ongoing program improvement efforts and to strive to
16 enroll the children most in need of our services. 45 C.F.R. §§ 1302.11(b), 1302.14. And we
17 are required to create inclusive and accessible classrooms for children with disabilities. 45
18 C.F.R. §§ 1302.51, 1303.75(a). This includes providing ongoing mental health services to
19 promote mental, social, and emotional well-being, which is critical to supporting each child’s
20 educational growth and school readiness. 45 C.F.R. §§ 1302.40, 1302.45(a)-(b), 1302.46.

21 18. In light of these language restrictions, I am unable to appropriately describe the
22 scope of my Head Start Agency’s services and how we serve the most vulnerable children and
23 families in our communities. I fear that if I comply with these instructions, I will be forced to
24 remove important substance from my Head Start Agency’s grant application that is necessary
25 to comply with the Head Start Act, the Head Start Performance Standards, and the Application
26 Instructions.

1 19. I also fear that these instructions will impact my Head Start Agency's ability to
2 continue providing programming in compliance with the requirements of the Head Start Act
3 and the Head Start Performance Standards. If my Head Start Agency is not permitted to submit
4 an application describing the services that the program provides for children with disabilities,
5 it suggests the program may also be prohibited from continuing to offer these services—even
6 though they are required by the Head Start Act and the Head Start Performance Standards. It
7 also suggests that continuing to convey to the public that my Head Start Agency offers these
8 services may be prohibited or make my program a target for using banned words.

9 20. This has put me in an impossible situation. On the one hand, I know that if my
10 Head Start Agency fails to comply with the Head Start Act and the Head Start Performance
11 Standards, that could be grounds for termination of our grant. On the other hand, if my Head
12 Start Agency's does continue to offer these services, despite being prohibited from describing
13 them in its grant application, in order to comply with the Head Start Act and Head Start
14 Performance Standards I fear the program will be penalized in future monitoring review.

15 **Pseudonymity**

16 21. I fear retaliation against my Head Start Agency, myself, and my family if I
17 reveal my identity in making this declaration. Because funding has been revoked from so many
18 organizations, sometimes because those organizations speak out against actions taken by
19 President Trump and his administration, I feel I need to give this declaration in pseudonym or
20 I or my Head Start Agency could be targeted.

21 22. I also fear for my personal safety, the safety of my family, and the safety of the
22 children in my program if I am required to publicly identify myself as providing information
23 against the Defendants. I fear that I and my Head Start Agency would be the target of
24 harassment and threats from members of the public for challenging policies and practices of
25 the Trump administration related to the DEIA Ban.

1 23. Because of my fears for myself and my Head Start Agency, I would not provide
2 this information if my identity were not anonymous.

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4 Pursuant to 28 U.S.C. § 1786, I declare under penalty of perjury that the foregoing is
5 true and correct.

6 Dated: December 4, 2025

/s/ Mary Roe

7 Mary Roe
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Exhibit A

Head Start **Non-Competitive** Grant Application Instructions

Version 4.0

September 2025



ADMINISTRATION FOR
CHILDREN & FAMILIES
Office of Head Start



PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13) STATEMENT OF PUBLIC BURDEN:

The purpose of this information collection is for eligible entities to apply for Head Start funding. Public reporting burden for this collection of information is estimated to average 20 hours per respondent, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. This collection of information is required to receive funding under the Head Start Act (42 USC 9801 et seq.). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information subject to the requirements of the Paperwork Reduction Act of 1995, unless it displays a currently valid OMB control number.

OMB Number: 0970-0207 **Expiration Date:** 09/30/2028

Overview of Non-Competitive Grant Application

The Office of Head Start requires recipients to submit funding applications for each year of the project period. Recipients applying for a **non-competitive** new grant must follow the instructions for submitting a [Baseline Application](#) for the first year of the new grant. These recipients are in the final 12 months of their current grant. Following the baseline, recipients submit a [Continuation Application](#) for the duration of the project period.

In the [Baseline Application](#), recipients describe the program design, approach to service delivery, and supporting budget. This is an opportunity for the recipient to present their strategies for meeting certain requirements and to ensure the delivery of high-quality services, including a program design that is responsive to the needs of the children and families in the community. In the [Continuation Application](#), recipients describe any changes and/or updates to their budget. The Office of Head Start analyzes each application to understand whether the recipient's proposal is reasonable, allowable, and allocable.

Recipients that received a grant through the **competitive process and are submitting their first grant application in HSES** must complete a [Baseline Application](#). These recipients will submit their baseline either a few months or up to a year after the start of their competitive new grant, depending on the length of their initial budget period. For example, a recipient awarded a new grant, through the competitive process, with an initial budget period of 07/01/2023—03/31/2024, must submit a baseline application to receive funding for their 04/01/2024—3/31/2025 budget period.

The Office of Head Start carefully considers each recipient's application to assure that agencies are meeting the intent of the Head Start mission, purpose, and regulations prior to issuing the Notice of Award.

Who should complete the grant application?

The completion of the grant application is a team effort. The application covers a wide range of topics and activities, and it represents a recipient's commitment to the implementation of the program and use of federal funds.

Are there general formatting requirements?

Yes, please adhere to the following:

1. Each page must be double-spaced, with one-inch margins on all sides.
2. Use a font size of 12 for narrative.
3. Each page must be numbered in the lower right corner.
4. Application Narrative and Budget Justification may not exceed 30 pages.

The application must follow the sequential order of the application instructions for the narrative. Tables, headers, and illustrations may have different formatting.

How do I receive assistance with application submission?

Please contact your Regional Office for assistance with the *Application and Budget Justification Narrative instructions*. For further technical assistance, please contact help@hsesinfo.org or 1-866-771-4737.

Instructions for Completing the **Baseline Application**

Submit the **complete grant application package** in an electronic format using the Head Start Enterprise System (HSES) at <https://hses.ohs.acf.hhs.gov/hsprograms>. The grant application section is located under the “Financials” tab. Incomplete applications will be returned for correction.

[ACF-IM-HS-19-04](#) Accounting Simplification for Head Start and Early Head Start, announced the consolidation of the Operations CANs by program. Please note that the Program Schedule and budget projections (Budget tab) must still be completed by Head Start program operation and Early Head Start program operation within the application separately.

A **complete grant application package** requires completing the following application tabs in HSES:

- Program Schedule
- Budget
- Other Funding
- SF-424A
- SF-424
- Documents

Signed Assurances

After submitting the grant application, HSES automatically generates the following electronically signed assurances for download in the SF-424 tab

1. SF424B, Assurances – Non-Construction Programs;
2. Certification Regarding Lobbying;
3. Certification Regarding Compliance with Compensation Cap (Level II of Executive Schedule); and
4. Tax Certification Form

Reminders for completing application tabs in HSES

- Make relevant changes where needed (e.g., Budget, Other Funding, SF-424, Program Schedule).
- **Change in Scope:** If proposing a Locally Designed Option, Enrollment Reduction or Conversion, indicate the application includes a “Change in Scope” request in HSES by clicking the appropriate box within the Change in Scope section on the Summary tab.
- **Budget:** A comprehensive budget aligns with the proposed program approach and identifies allowable costs and is aggregated by object class budget category. Separate projected budgets for Head Start and Early Head Start by grant and by delegate must be

completed.

- **Budget:** Enter each partnership contract for direct services to children and families under the “Contractual” budget category tab, line “8. Other Contracts”. For each recipient or delegate budget, enter an individual financial line item in the budget for each contract over \$250,000 and briefly explain the services to be provided. For any single line-item costing more than \$250,000 in the “Other” budget category, please enter an individual financial line item. **Applications with consolidated amounts will be returned for correction.**

What documents do I upload in the Documents tab in HSES?

Upload the following documents in their respective folders of the Grant Application Documents tab in HSES. **Do not upload documents completed on-screen, such as the SF-424 and signed assurances.**

Cost Allocation Plan

Upload a written cost allocation plan, certified in accordance with [45 CFR §75.415](#) that describes how shared costs, including shared staff, are allocated based on proportional benefit as required in [45 CFR §75.405](#). Indirect cost must be included unless the applicant has a negotiated indirect cost rate agreement or has adopted use of the 15% de minimis rate.

Indirect Cost Rate Agreement

If applicable, upload a copy of the current or proposed negotiated indirect cost rate agreement between the agency and/or delegate agencies and the respective cognizant Federal agency. If using the 15% de minimis indirect cost rate, upload a copy of the policy or other written record indicating the date upon which the rate was adopted.

Application Narrative

Sub-Section A: Service Delivery

Describe your program’s approach to meeting the need for comprehensive child development services for eligible children and families in your service area by addressing the questions below.

- 1. Service and Recruitment Area** (see [1302.11\(a\)](#) and [1302.13](#))
 - a. Identify the service and recruitment area for proposed program operations.
 - b. List your service locations. If applicable, include proposed child care partners and identify the number of children proposed to be served through partnership slots.
- 2. Needs of Children and Families** (see [1302.11\(b\)](#) and Special Instruction on Community Assessment)

- a. Provide a summary of data from your community assessment that informs the program's selection criteria and design, such as:
 - i. The estimated number of eligible children under five years of age and pregnant women by geographic location, spoken language, and other demographic variables as appropriate, including children experiencing homelessness, in foster care, and with disabilities;
 - ii. Data regarding the education, health, nutrition, social service, child care, parent schedules, and other service needs of the proposed children, families, and pregnant women; and
 - iii. The availability of other child-development, child-care centers, and family child care programs that serve eligible children, including home visiting, publicly funded state and local preschools, and the approximate number of eligible children served.

3. Proposed Program Option(s) and Funded Enrollment Slots (see [1302 Subpart B](#) and [the HSPPS Compliance Table](#))

- a. Specify the proposed program option(s) (i.e., center-based, home-based, family child care, and slots for services to pregnant women) and describe how your program will ensure compliance with [1302 Subpart B](#) requirements and other applicable requirements.
 - i. **Locally Designed Option.** If requesting a locally-designed program option variation (LDO) waiver under [1302.24\(c\)](#), explain the rationale and address the questions outlined in [Locally-designed Program Option Considerations](#).
- b. Discuss how your program option(s) will meet the needs of children and families in the communities served including how these options support populations identified in the community assessment and selection criteria.
- c. **Enrollment Reductions and Conversions.** If proposing to reduce or convert the number of funded enrollment slots, explain the rationale, and address the considerations outlined in ACF-IM-HS-22-09 and Enrollment Reduction and Conversion Considerations Appendix. Applications that do not fully address such consideration will be returned for correction, and in some cases the Regional Office may require recipients to submit a separate Change in Scope Application.
- d. **Migrant and Seasonal Head Start.** List centers and crops in the center service area. For each center, include dates that the center is open and closed, hours of operations (e.g., 6:00 a.m. to 5:00 p.m.), and number of infants, toddlers and/or preschoolers expected to enroll. You may upload this as a supporting document in the MSHS Center Service Area folder.

4. Eligibility, Recruitment, Selection, Enrollment, and Attendance (see [1302.13](#), [1302.14](#), [1302.15](#), and [1302.16](#))

- a. Describe the recruitment process to ensure services will be provided to those in greatest need of program services, including specific efforts and expected challenges to actively locate, recruit, and enroll children experiencing homelessness, children in foster care, and children with disabilities.
- b. Describe your program's strategy to promote regular attendance, including special efforts for chronically absent children.

5. Education and Child Development (see [1302 Subpart C](#))

If center-based or family child care program option is chosen, respond to item a, and c through d. If home-based program option is chosen, respond to items b through d. If locally-designed program option is chosen, respond to items that apply. Programs that serve American Indian and Alaska Native (AIAN) children also respond to item e.

- a. Center-based or family child care programs:
 - i. Identify the curriculum(s) your program will use including, if applicable, curricular enhancements and/or significant adaptations.
- b. Home-based programs:
 - i. Identify the home-based curriculum(s) your program will use including, if applicable, curricular enhancements and/or significant adaptations.
 - ii. Describe group socializations to be offered.
- c. Identify the developmental screenings and assessments your program plans to use and why, including how the program addresses screening and assessment for children who are dual language learners.
- d. Describe opportunities offered to parents and family members to be engaged in their child's education such as participation in screenings and assessment and providing feedback on the selected curriculum and instructional materials.
- e. For programs serving AIAN children, and where applicable, describe efforts for Tribal language preservation, revitalization, restoration, or maintenance.

6. Health (see [1302 Subpart D](#))

- a. Describe how your program will, in partnership with parents, meet the oral health, nutritional, mental health, social and emotional well-being, health status and care needs of children and support each child's growth and school readiness:
 - i. Include how your program will ensure up-to-date child health status, ongoing care, and timely follow-up care.

- ii. For mental health and social and emotional well-being, describe how a program will provide mental health consultation services in partnership with staff and families.
- b. Describe your program's timeline for conducting screenings of the health and safety environments of each center and/or family childcare home where services are provided using the [Health and Safety Screener](#). Health and Safety screenings must be completed within 45 days of:
 - i. the start of the school year;
 - ii. children receiving services in a new environment; and/or
 - iii. start of project period when the project period begins during the program or school year.

7. Family and Community Engagement (see [1302 Subpart E](#))

- a. Describe key program strategies for building trusting and respectful relationships with families and for providing program environments and services that are welcoming and culturally and linguistically responsive to families, including those specific to fathers.
- b. Describe engagement activities to support parent-child relationships, child development, family literacy, and language development.
- c. Describe how your program has selected and is implementing a research-based parenting curriculum. Describe how your program engages parents in a research-based parenting curriculum.
- d. Describe key program strategies for family partnership services, including:
 - i. Procedures for conducting the family assessment and family partnership process and aligning activities to the [Parent, Family, and Community Engagement Framework](#) outcomes; and
 - ii. Tracking progress toward individual family goals and needs.
- e. Provide a few examples of community partnerships that facilitate access to services or resources in the community that are responsive to family partnership goals and children's needs. Identify any challenges to necessary partnerships and how the program plans to address those challenges.

8. Services for Children with Disabilities (see [1302 Subpart F](#))

- a. Describe how your program will ensure full participation in program services and activities for enrolled children with disabilities, including but not limited to those who are eligible for services under IDEA and those who already have an IFSP or IEP.
- b. Describe how your program will ensure the individualized needs of children with disabilities are met, including how the program will collaborate with and help parents in the process

and how the program will coordinate and collaborate with the local agency responsible for implementing IDEA.

9. Transition (see [1302 Subpart G](#))

Describe strategies and practices to support successful transitions in:

- a. Transitions to and from Early Head Start;
- b. Transitions from Head Start to kindergarten; and
- c. Transitions between programs.

10. Services to Enrolled Pregnant Women (see [1302 Subpart H](#))

- a. Describe how your program facilitates access to a source of ongoing care for enrolled pregnant women that do not have existing access to such care.
- b. Describe your program's strategy to provide prenatal and postpartum information, education, and services such as those that address fetal development, nutrition, risks of alcohol and drugs, postpartum recovery, and infant care and safe sleep practices.
- c. Describe how your program's family partnership services include a focus on factors that influence prenatal and postpartum maternal and infant health, includes other relevant family members, and support the transition process.

11. Transportation (see [1303 Subpart F](#))

- a. Describe the level of need for child transportation services.
- b. Describe how your program will either directly meet transportation needs or assist families in accessing other transportation so that children can attend the program.

Sub-Section B: Governance, Organizational, and Management Structures

Describe the governance, organizational, and management structures that support quality services and maintain accountability, efficiency, and leadership within your program by addressing the questions below.

1. Governance (see [45 CFR Part 1301](#) and [Section 642\(c\)-\(d\)](#) in the Act)

Structure

- a. Identify the member
 - i. with expertise in fiscal management or accounting;
 - ii. with expertise in early childhood education and development, and
 - iii. the licensed attorney familiar with program governance issues in the governing body/tribal council.

- b. Describe how your program ensures additional members on the governing body reflect the community, including parents, and representation from other key programmatic areas.
- c. Describe the makeup of the policy council or if applicable, the policy committee. Include how each program option is represented.

Processes

Governing Body

- a. Describe how the governing body receives key program information as outlined in [1301.2\(b\)\(2\)](#) to inform their ongoing responsibilities including how decisions submitted by the policy council are incorporated into the decision-making process.
- b. Describe other key processes to ensure the governing body maintains effective ongoing oversight of program operations and accountability for federal funds.
- c. If applicable, describe and explain the responsibilities delegated to any advisory committee related to program governance and improvement of the Head Start program. Include how the governing body maintains its legal and fiscal responsibility in the process.

Policy Council and Policy Committee

- d. Describe how the policy council, and if applicable, the policy committee, receives and shares key program information as outlined [1301.3\(c\)\(2\)](#) to inform their ongoing responsibilities.

Parent Committees

- e. Describe how the parent committees communicate with staff to inform program policies, activities, and services to ensure they meet the needs of children and families.
- f. Describe the process for communication with the policy council and policy committees.

2. Human Resources Management (see [1302 Subpart I](#))

- a. Provide an organizational chart identifying the management and staffing structure including the Executive Director, the Program Directors, managers, and other key staff. Include assigned areas of responsibility and lines of communication. You may upload this as a supporting document.
- b. Describe your program's approach to establishing pay scales, determining compensation rates, and wage comparability within service area.
- c. Describe systems developed to ensure criminal background checks occur prior to hire for all staff, consultants, and contractors in the program.
- d. Describe orientations provided to new staff, consultants, and volunteers.

- e. Describe key features of your program's approach to staff training and professional development. Describe your program's approach to implementing a research-based coordinated coaching strategy, including the approach to the delivery of intensive coaching for identified staff.

3. Program Management and Quality Improvement (see [1302 Subpart J](#))

- a. Describe key features of your program's systems for ongoing oversight, correction, and assessment of progress towards your program's identified goals. Include approaches that promote effective teaching and health and safety practices.
- b. Describe key features of your program's management process and system to ensure continuous program improvement that relate to effectively using data and ongoing supervision to support individual staff professional development and promote staff retention.
- c. Describe how the management system ensures budget and staffing patterns that promote continuity of care, allow sufficient time for staff participation in training and professional development, and allow for provision of the full range of services.
- d. If applicable, describe any internal controls findings/issues identified through ongoing monitoring, self-assessment, or recent audits and describe plans to address such findings/issues.

Budget Justification

Separate projected budgets must be completed for both Head Start and Early Head Start program operations and Head Start and Early Head Start training and technical assistance by grant and by delegate.

Upload a detailed narrative to explain the costs by object class budget category identified within the SF-424A Section B-6. The total amount of funds detailed in the budget narrative must equal the total amount requested in the SF-424A.

Program Operations

- 1. Explain significant personnel and fringe adjustments for this budget period for lines a and b on the SF-424A. Please identify salaries that are cost allocated amongst other programs, federal and non-federal.
- 2. For each line c through h on the SF-424A, ensure the narrative aligns with the amounts requested for direct and, if applicable, indirect costs. If applicable, identify cost allocated

expenses, federal and non-federal.

3. If applicable, describe the planned use of cost-of-living adjustment (COLA) funds based on the related Program Instruction.
4. Identify each source of non-federal match, including the estimated amount per source and the valuation methodology. Explain how your program determined that proposed non-federal match is allowable per [45 CFR §75.306](#), [2 CFR § 200.306](#), and [Section 1303.4](#).
5. **Enrollment Reductions and Conversions.** If requesting an enrollment reduction or conversion, explain the rationale and address the budget considerations outlined in [ACF-IM-HS-22-09](#) and [Enrollment Reduction and Conversion Considerations Appendix](#). **Applications that do not fully address such consideration will be returned for correction and in some cases the Regional Office may require recipients to submit a separate Change in Scope Application.**
6. If requesting funds for equipment as defined in [2 CFR § 200.439](#), identify each item individually and describe the procurement procedures to be followed for the purchase of such equipment. See equipment definition at [2 CFR § 200.1](#).

Training and Technical Assistance

7. Training and technical assistance funds are awarded separately by program. Describe the use of these funds, by object class budget category identified within the SF-424A Section B-6, to support the recipient's training and technical assistance activities.

Sample Delegate and/or Partnership Contracts

If applicable, upload sample delegate and/or partnership contracts.

Other Supporting Documents

If applicable, upload other supporting documents as needed.

Instructions for Completing the **Continuation Application**

Submit the complete grant application package in an electronic format using the Head Start Enterprise System (HSES) at <https://hses.ohs.acf.hhs.gov/hsprograms>. The Grant Application section is located under the “Financials” tab. Incomplete applications will be returned for correction.

[ACF-IM-HS-19-04](#) Accounting Simplification for Head Start and Early Head Start, announced the consolidation of the Operations CANs by program. Please note that the Program Schedule and budget projections (Budget tab) must still be completed by Head Start program operation and Early Head Start program operation within the application separately.

A complete grant application package requires completing the following application tabs in HSES:

- Program Schedule
- Budget
- Other Funding
- SF-424A
- SF-424
- Documents

Signed Assurances

After submitting the grant application, HSES automatically generates the following electronically signed assurances for download in the SF-424 tab

1. SF424B, Assurances – Non-Construction Programs;
2. Certification Regarding Lobbying;
3. Certification Regarding Compliance with Compensation Cap (Level II of Executive Schedule); and
4. Tax Certification Form

Reminders for completing application tabs in HSES

- Make relevant changes where needed (e.g., Budget, Other Funding, SF-424, Program Schedule).
- **Change in Scope:** If proposing a Locally Designed Option, Enrollment Reduction or Conversion, indicate the application includes a “Change in Scope” request in HSES by clicking the appropriate box within the Change in Scope section on the Summary tab.
- **Budget:** A comprehensive budget aligns with the proposed program approach and

identifies allowable costs and is aggregated by object class budget category. Separate projected budgets for Head Start and Early Head Start by grant and by delegate must be completed.

- **Budget:** Enter each partnership contract for direct services to children and families under the “Contractual” budget category tab, line “8. Other Contracts.” For each recipient or delegate budget, enter an individual financial line item in the budget for each contract over \$250,000 and briefly explain the services to be provided. For any single line-item costing more than \$250,000 in the “Other” budget category, please enter an individual financial line item. **Applications with consolidated amounts will be returned for correction.**

What documents do I upload in the Documents tab in HSES?

Upload the following documents in their respective folders of the Grant Application Documents tab in HSES. **Do not upload documents completed on-screen, such as the SF-424 and signed assurances.**

Cost Allocation Plan

Upload a written cost allocation plan, certified in accordance with [45 CFR §75.415](#) that describes how shared costs, including shared staff, are allocated based on proportional benefit as required in [45 CFR §75.405](#). Indirect cost must be included unless the applicant has a negotiated indirect cost rate agreement or has adopted use of the 15% de minimis rate.

Indirect Cost Rate Agreement

If applicable, upload a copy of the current or proposed negotiated indirect cost rate agreement between the agency and/or delegate agencies and the respective cognizant Federal agency. If using the 15% de minimis indirect cost rate, upload a copy of the policy or other written record indicating date upon which the rate was adopted.

Application Narrative

1. **Locally Designed Option.** If requesting a locally-designed program option variation (LDO) waiver under [1302.24\(c\)](#), explain the rationale and address the questions outlined in [Locally-designed Program Option Waiver Considerations](#)
2. **Enrollment Reductions and Conversions.** If proposing to reduce or convert the number of funded enrollment slots, explain the rationale, and address the considerations outlined in [ACF-IM-HS-22-09](#) and [Enrollment Reduction and Conversion Considerations Appendix](#). Applications that do not fully address such consideration will be returned for correction and in some cases the Regional Office may require recipients to submit a separate Change in Scope Application.

3. **Migrant and Seasonal Head Start.** List centers and crops in the center service area. For each center, include dates that the center is open and closed, hours of operations (e.g., 6:00 a.m. to 5:00 p.m.), and number of infants, toddlers and/or preschoolers expected to enroll. You may upload this as a supporting document in the MSHS Center Service Area folder.

Budget Justification

Separate projected budgets must be completed for both Head Start and Early Head Start program operations and Head Start and Early Head Start training and technical assistance by grant and by delegate.

Upload a detailed narrative to explain the costs by object class budget category identified within the SF-424A Section B-6. The total amount of funds detailed in the budget narrative must equal the total amount requested in the SF-424A.

Program Operations

1. Explain significant personnel and fringe adjustments for this budget period for lines a and b on the SF-424A. Please identify salaries that are cost allocated amongst other programs, federal and non-federal.
2. For each line c through h on the SF-424A, ensure the narrative aligns with the amounts requested for direct and, if applicable, indirect costs. If applicable, identify cost allocated expenses, federal and non-federal.
3. If applicable, describe the planned use of cost-of-living adjustment (COLA) funds based on the related Program Instruction.
4. Identify each source of non-federal match, including the estimated amount per source and the valuation methodology. Explain how your program determined that proposed non-federal match is allowable per [45 CFR §75.306](#), [2 CFR § 200.306](#), and [Section 1303.4](#)
5. **Enrollment Reductions and Conversions.** If requesting an enrollment reduction or conversion, explain the rationale and address the budget considerations outlined in [ACF-IM-HS-22-09](#) and [Enrollment Reduction and Conversion Considerations Appendix](#). **Applications that do not fully address such consideration will be returned for correction and in some cases the Regional Office may require recipients to submit a separate Change in Scope Application.**
6. If requesting funds for equipment as defined in [2 CFR § 200.439](#) identify each item individually and describe the procurement procedures to be followed for the purchase of such equipment. See equipment definition at [2 CFR § 200.1](#).

Training and Technical Assistance

7. Training and technical assistance funds are awarded separately by program. Describe the use of these funds, by object class budget category identified within the SF-424A Section B-6, to support the recipient's training and technical assistance activities.

Sample Delegate and/or Partnership Contracts

If applicable, upload sample delegate and/or partnership contracts.

Other Supporting Documents

If applicable, upload other supporting documents as needed.

EXHIBIT B

From: no-reply@hsesinfo.org <no-reply@hsesinfo.org>

Sent: Wednesday, November 19, 2025 8:04 AM

To: [REDACTED]; [REDACTED]@acf.hhs.gov; [REDACTED]@acf.hhs.gov

Subject: HSES - Non-Competing New Grant Application for Grant [REDACTED]

Returned

Caution: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[REDACTED]
01/01/2026-12/31/2026

A Non-Competing New grant application was returned to the Grantee.

Please remove the following words from your application: Racism, Race, Racial, marginalized, institutional, historically, bias, Equity, equitable, diversity, diverse, belong, belonging, inclusion, inclusivity, gender, chestfeeding, pregnant people, or LGBTQIA 25+. Please contact your Program Specialist for any further clarification. Thank you.

EXHIBIT C

From: [REDACTED]@ACF.hhs.gov>
Sent: Wednesday, November 19, 2025 8:32 AM
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]@acf.hhs.gov>
Subject: Application returned

Caution: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning (again),

I wanted to follow up with you concerning your application. I sent it back asking for the removal of particular words and I wanted to provide you with the complete list of words to make sure are not in your applications. I am also requesting a summary of your most recent self-assessment results if available. Finally, I wanted to offer my cell number for those times of emergency or quick follow-up when you're away from the office phone- [REDACTED]. I look forward to meeting you and your team. Thank you.

[REDACTED]

Program Specialist (PS)

U.S. Department of Health and Human Services

Administration for Children and Families

Office of Head Start

Phone: [REDACTED]

Words to limit or avoid in government documents.

- accessible
- activism
- activists
- advocacy
- advocate
- advocates
- affirming care
- all-inclusive
- allyship
- anti-racism
- antiracist
- assigned at birth
- assigned female at birth
- assigned male at birth
- at risk
- barrier
- barriers
- belong
- bias
- biased
- biased toward
- biases
- biases towards
- biologically female
- biologically male
- BIPOC
- Black
- breastfeed + people
- breastfeed + person
- chestfeed + people
- chestfeed + person
- clean energy
- climate crisis

- climate science
- commercial sex worker
- community diversity
- community equity
- confirmation bias
- cultural competence
- cultural differences
- cultural heritage
- cultural sensitivity
- culturally appropriate
- culturally responsive
- DEI
- DEIA
- DEIAB
- DEIJ
- disabilities
- disability
- discriminated
- discrimination
- discriminatory
- disparity
- diverse
- diverse backgrounds
- diverse communities
- diverse community
- diverse group
- diverse groups
- diversified
- diversify
- diversifying
- diversity
- enhance the diversity
- enhancing diversity
- environmental quality

- equal opportunity
- equality
- equitable
- equitableness
- equity
- ethnicity
- excluded
- exclusion
- expression
- female
- females
- feminism
- fostering inclusivity
- GBV
- gender
- gender based
- gender based violence
- gender diversity
- gender identity
- gender ideology
- gender-affirming care
- genders
- Gulf of Mexico
- hate speech
- health disparity
- health equity
- hispanic minority
- historically
- identity
- immigrants
- implicit bias
- implicit biases
- inclusion
- inclusive

- inclusive leadership
- inclusiveness
- inclusivity
- increase diversity
- increase the diversity
- indigenous community
- inequalities
- inequality
- inequitable
- inequities
- inequity
- injustice
- institutional
- intersectional
- intersectionality
- key groups
- key people
- key populations
- Latinx
- LGBT
- LGBTQ
- marginalize
- marginalized
- men who have sex with men
- mental health
- minorities
- minority
- most risk
- MSM
- multicultural
- Mx
- Native American
- non-binary
- nonbinary

- oppression
- oppressive
- orientation
- people + uterus
- people-centered care
- person-centered
- person-centered care
- polarization
- political
- pollution
- pregnant people
- pregnant person
- pregnant persons
- prejudice
- privilege
- privileges
- promote diversity
- promoting diversity
- pronoun
- pronouns
- prostitute
- race
- race and ethnicity
- racial
- racial diversity
- racial identity
- racial inequality
- racial justice
- racially
- racism
- segregation
- sense of belonging
- sex
- sexual preferences

- sexuality
- social justice
- sociocultural
- socioeconomic
- status
- stereotype
- stereotypes
- systemic
- systemically
- they/them
- trans
- transgender
- transsexual
- trauma
- traumatic
- tribal
- unconscious bias
- underappreciated
- underprivileged
- underrepresentation
- underrepresented
- underserved
- undervalued
- victim
- victims
- vulnerable populations
- women
- women and underrepresented