



PUBLIC POLICY BRIEFING

Understanding the Head Start NPRM

and Opportunities for Engagement

Notice of Proposed Rulemaking · RIN 0970-AD30 · Public Comment Period

Speakers



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Agenda



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Background and Overview



On August 7, 2026, the Administration for Children and Families (ACF) released a Notice of Proposed Rulemaking (NPRM), ***“Reducing Federal Burden for Head Start Programs”*** (RIN 0970-AD30).

[federalregister.gov/documents/2026/08/07/2026-16134](https://www.federalregister.gov/documents/2026/08/07/2026-16134)

- The proposal would replace the current Head Start Program Performance Standards with a significantly shorter set of federal regulations.
- Publication of the NPRM launched the public comment period, during which the public may submit comments during a 60-day window.
- The comment period is an important time for advocacy engagement — and activity will continue after it closes.

Funding for Head Start



While the proposed changes may impact future Head Start appropriation levels, the proposed rule does not immediately allocate additional funding or remove funding from the program.



Executive Branch

The Head Start NPRM and rulemaking process fall under the Executive Branch.



Legislative Branch

Congress determines funding allocations for federal programs.

Key Messages from the Administration



Flexibility



**Deference to
State and
Local
Leaders**



**Reducing
Costs**



**Serving
More
Children and
Families**



What is in the NPRM?

Ratios / Group Sizes

PROPOSED CHANGE

The proposed rule removes Head Start regulation on ratios and group sizes, deferring instead to state licensure requirements.

POTENTIAL IMPACT

This change would permit programs to adopt the (often higher) ratio and group-size limits set by state licensing regulations. For example, 47 states do not align with the existing HSPPS standard for two-year-olds (1 teacher per 4 children) — in some states, the allowable threshold is almost triple. Increased ratios and group sizes raise concerns about child safety, program quality, and children's learning experiences.

Hours of Service / Duration

PROPOSED CHANGE

The proposed rule reduces the hours of service required of Head Start programs.

POTENTIAL IMPACT

Removing duration requirements will allow wider variance across programs and may lead to a decrease in service hours, impacting families' ability to access care.

Teacher & Staff Qualifications

PROPOSED CHANGE

The proposed rule removes regulation and defers to the Head Start Act for teachers and some staff. Requirements for other staff not named in the Act are removed entirely.

POTENTIAL IMPACT

Removing qualification requirements, paired with a prohibition on requiring or incentivizing additional degrees or credentials, is likely to affect recruitment, retention, and career advancement for the Head Start workforce — and may exacerbate existing staffing challenges facing the child care sector.

English-Only Requirement

PROPOSED CHANGE

The proposed rule adds a NEW requirement of English-only instruction, applying to all Head Start grantees apart from Indian Head Start Agencies.

POTENTIAL IMPACT

In 2025, almost 40% of enrolled children were dual language learners (DLLs). This raises concerns about negative effects on young DLLs' social development and language acquisition, along with limited communication and difficulty enrolling families.

Discipline

PROPOSED CHANGE

The proposed rule removes federal discipline regulations, deferring instead to state licensure requirements.

POTENTIAL IMPACT

Only 17 states address expulsion in their child care regulations, and just 12 states have a suspension limit. Removing the federal regulation on suspension and expulsion raises concerns about access to care for children displaying challenging behaviors.

Administrative Cost Cap

PROPOSED CHANGE

The proposed rule reduces the administrative budget cap for Head Start grantees from 15% to 5%.

POTENTIAL IMPACT

Only 3.7% of Head Start grantees currently operate at or below 5% in admin costs. Most programs will need to reclassify, reduce, or redirect funding to comply — likely resulting in major changes to how grantees administer and manage their programs.

Other Notable Impacts

Additional topic areas CCAoA has identified that will see major changes as a result of the proposed rule — and may be a priority for your organization.



Health Screenings

Removes health screening specificity and timelines; defers to statute.



Serving Children with Disabilities

Removes guidance on serving children with disabilities; defers to statutory and state licensure requirements.



Serving Children Experiencing Homelessness

Removes the self-attestation option for this group and requires documentation for enrollment.



QRIS

Removes the requirement for Head Start programs to participate in QRIS; defers to state licensure requirements.

Regulatory Impact Analysis (RIA)



From the Office of the Assistant Secretary for Planning and Evaluation, U.S. Department of Health and Human Services (HHS)



THE GOAL

"...ensure that regulatory actions are justified and necessary to achieve social goals, and that these actions are implemented in the most efficient, least burdensome, and most cost-effective manner possible."



WHAT IT INCLUDES

"...an assessment of the benefits and costs anticipated to result from a proposed regulatory action."



IN PRACTICE

"To the extent possible, RIAs quantify and monetize the anticipated benefits and costs and assess the distribution of the impacts."

” “Where We Stand”

*...We have concluded that many of the proposed changes **risk weakening the very things children facing the greatest barriers need** for healthy development and learning...*

*We know from our on-the-ground network working in every state that **it is possible to reduce unnecessary burden without reducing what children receive; to give local programs flexibility without making quality optional; and to expand access without asking children, families and educators to accept less in return.***

But too many of the proposed changes undermine some of the very reasons that Head Start produces real and measurable benefits for children and families—in healthy development, educational attainment and economic well-being.

info.childcareaware.org/media/where-we-stand-on-head-start-nprm





How to Engage

How to Engage: Submit Comments

- 1 Go to the Federal Register page and click the green “Submit A Public Comment” button.
- 2 Write directly in the comment box, or submit a file attachment.
- 3 All comments — without change — are posted to www.regulations.gov, so please do not include any personal or sensitive information.

<https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

Comments are due by **October 6, 2026**

How to Engage: Contact Your Lawmakers

Send an email to your lawmaker explaining your position on the NPRM. Messages that are especially important right now include:

- The importance of Head Start to the early childhood system
- What is unique and special about Head Start
- The role Head Start plays in your state or community
- How your state will be impacted by the changes in the proposed rule



Our Voices Make a Difference

2025

President Trump's budget called for the elimination of Head Start funding.

2025–2026

Advocates flooded Congress with calls, emails, and meetings about the importance of Head Start.

Feb 2026

Congress passed government funding, including \$12.357 billion for Head Start — an increase of \$85 million.

What Happens Next



1

Comment Period Closes

The public comment period ends October 6, 2026.

2

Agency Review

The agency reviews all comments received and conducts a comment analysis.

3

Decision Point

The agency decides whether to proceed, issue a modified proposal, or withdraw it.

4

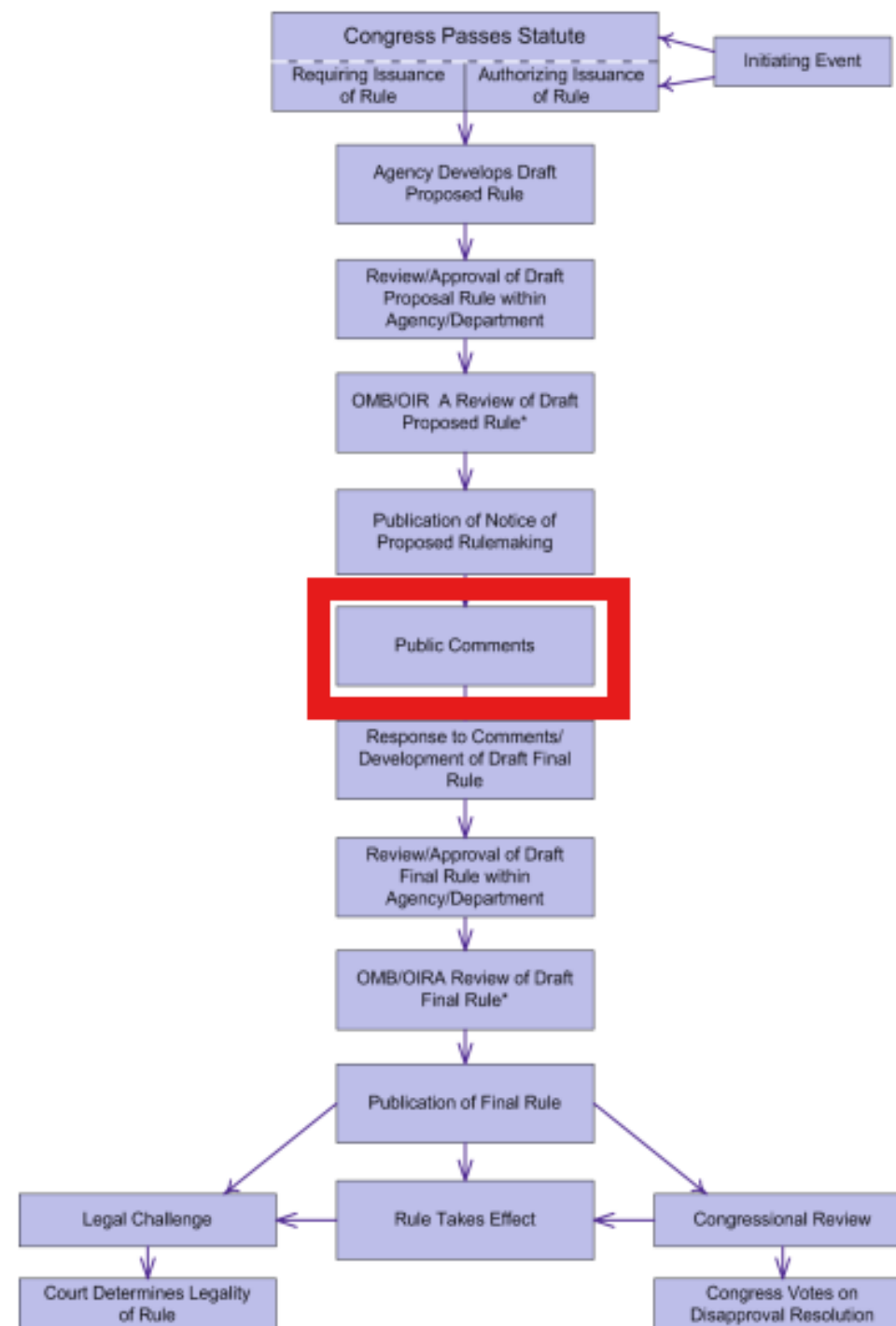
Final Rule Published

Published in the Federal Register; effective no less than 30 days after publication (absent an exemption or “good cause”).

More information: [regulations.gov/learn](https://www.regulations.gov/learn) · [congress.gov/crs-product/RL32240](https://www.congress.gov/crs-product/RL32240)

What Happens Next – Pt. 2

We are now in the Public Comments period of the Federal Rulemaking Process





We Are Now In the

Public Comment Period

Closes October 6, 2026

What About Funding?



Congress Buys Time: What It Means for Child Care Funding This Fall

September 04, 2026

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A Short-Term Deal, Not a Final Answer

This week Congress passed a continuing resolution (CR) to keep the federal government funded at current levels, and President Trump promptly signed it. While the CR avoids a shutdown (good news), it doesn't answer the bigger question child care advocates are watching: how much will Congress invest in Child Care and Development Block Grant (CCDBG) program, Head Start, and other early learning programs for the year ahead?

That decision is postponed. Lawmakers now have until December 11 to write and pass the full-year funding bills that will settle it.

Congress passed a continuing resolution (CR) to extend their funding deadline to **December 11.**

Decisions are still being made about funding for Head Start, along with CCDBG and PDG.

info.childcareaware.org/blog/congress-buys-time



Resources

From Partners

ON THE NPRM

- National Head Start Association — NPRM Hub page : <https://nhsa.org/nprm-resources/>
- FFYF — FAQ, Analysis, and Searchable Spreadsheet : <https://www.ffyf.org/2026/08/19/state-of-play-nprm/>

DEEP DIVES ON ISSUES IN THE NPRM

- **The English-Only Provision & Impact on DLLs** — The Children's Equity Project <https://cep.asu.edu/resources/dual-language-learners-head-start>
- **The Importance of Head Start Performance Standards** — The Children's Equity Project “Lowering the Bar” analysis - <https://cep.asu.edu/resources/An-Analysis-of-How-Replacing-Head-Start-Standards-with-State-Child-Care-Licensing-Weakens-Early-Learning-Across-the-United-States>
- **Ratios and Group Size** — Start Early's State Ratio Information + NPRM Impact: <https://drive.google.com/file/d/1r9SU4BtMrtaW5Ctn0b8znTBtsyv8G2-x/view>

From CCAoA

- 1 The Head Start Hub : <https://www.childcareaware.org/head-start-nprm/>
- 2 The Head Start NPRM Fact Sheet:
<https://info.childcareaware.org/hubfs/Head%20Start%20NPRM%20Fact%20Sheet.pdf>
- 3 Head Start Act Crosswalks — Discipline, Health Screenings, English Only, QRIS, Staff Qualifications
[https://info.childcareaware.org/hubfs/Head Start NPRM Comparison ALL.pdf](https://info.childcareaware.org/hubfs/Head%20Start%20NPRM%20Comparison%20ALL.pdf)
- 4 First Statement:
<https://info.childcareaware.org/media/child-care-aware-of-america-statement-on-administrations-head-start-changes>
- 5 “Where We Stand” Statement:
<https://info.childcareaware.org/media/where-we-stand-on-head-start-nprm>



Questions & Answers