



NPRM: “REDUCING FEDERAL BURDEN FOR HEAD START PROGRAMS”

BACKGROUND

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). CCAoA’s statement from CEO Susan Gale Perry is available [here](#).

ACF’s proposal would replace the current Head Start Program Performance Standards (HSPPS) with a significantly shorter set of federal regulations. 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.

MAJOR PROPOSED CHANGES

Admin Cap

- **Proposal:** Changing the current cap of 15% for program administrative expenses to 5%. Under the NPRM, programs can apply for a waiver from the 5% cap to spend above that threshold.
- **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. This is likely to result in major changes for how Head Start Grantees administer and manage their programs.

Ratios/Group Sizes

- **Proposal:** Removing provisions on thresholds in the HSPPS and directing Head Start programs to follow child care licensing requirements in their state for group size and ratios.

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- **Potential Impact:** This proposed 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 regulation for two-year olds (1 teacher per 4 children). In some states, the allowable threshold for two-year olds is almost triple the existing HSPPS standard. Increased ratio and group sizes raise concerns about child safety, program quality, and children's learning experiences.

Discipline

- **Proposal:** Removing existing prohibitions on suspending or expelling children from the Head Start program and directing programs to follow local and state licensing requirements on discipline.
- **Potential Impact:** 17 states address expulsion in their child care regulations and only 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.

Hours of Service/Duration

- **Proposal:** Removing the duration-of-service minimum of 3.5 hours per day for center-based Head Start Preschool programs. The NPRM defers to the Head Start Act, which requires a 3 hour per day minimum. It also removes the requirement for Early Head Start center based and family child care programs to reach the 1,380 hours/year threshold—leaving no replacement requirement for those programs.
- **Potential Impact:** Removing duration requirements will allow a wider variance and may lead to a decrease in service hours, impacting families' ability to access care.

English Only

- **Proposal:** Requiring all Head Start instruction to be conducted in English and removing standards for serving dual-language learners. Note: Tribal grantees that include Tribal languages as part of their heritage are exempted from this English-only instruction.

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- **Potential Impact:** Apart from Indian Head Start Agencies, this would apply to all Head Start grantees, in which almost 40% of enrolled children were dual language learners (DLLs) in 2025. This raises concerns about negative effects on young DLL's social development and language acquisition, in addition to limited communication and difficulty in enrolling families.

Teacher & Staff Qualifications

- **Proposal:** Removing all staff qualifications and professional development requirements beyond those required by statute. It defers to the Head Start Act, which requires qualifications for teachers, but not all staff positions. The staff qualification requirements for Head Start Director, family child care provider, coaches, and others would be removed. The NPRM also proposes a new provision that would bar Head Start Grantees from requiring or incentivizing degrees or credentials for those positions.
- **Potential Impact:** The removal of qualification requirements paired with the prohibition on requiring or incentivizing additional degrees or credentials is likely to impact the recruitment, retention, and career advancement for the Head Start workforce. This may exacerbate existing staffing challenges facing the child care sector.

OTHER NOTABLE AREAS OF PROPOSED CHANGES

This is not an exhaustive list. Other notable proposed changes include removing health screening specificity and timelines; removing guidance on serving children with disabilities; removing the self-attestation option for families with children experiencing homelessness; and removing the requirement for Head Start programs to participate in QRIS.

HOW TO SUBMIT COMMENTS

The NPRM publication launched the 60-day public comment period, an important time for advocates to engage. Visit the [Federal Register page](#) and click the green “Submit A Public Comment” button. All unedited comments will be posted to www.regulations.gov, so please do not include any personal or sensitive information.

SUBMIT A PUBLIC COMMENT

Comments are due by Oct. 6, 2026.