



HEAD START ACT vs. REGULATIONS vs. NPRM

A Comparison for Policy Staff and Advocates - Quality Rating and Improvement Systems (QRIS)

About this document

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). The NPRM would replace most of the current Head Start Program Performance Standards (45 CFR Part 1302) with a much shorter set of federal regulations, shifting many current requirements to state licensing law, program discretion, or no requirement at all.

This analysis was prepared to give policy staff, researchers, and advocates a detailed, side-by-side view of how specific Head Start policy areas are treated under three sources of authority: the Head Start Act (statute), the current Head Start Program Performance Standards (regulation), and the proposed NPRM. This document is written for readers who want to see how the underlying statutory, regulatory, and NPRM language itself compares.

Each topic section includes:

- **Overview:** a short summary of how the three sources relate to one another on this topic
- **Side-by-side comparison table:** four-column tables (Dimension | Head Start Act | Current Regulations | NPRM) on each source’s treatment of a given aspect
- **NPRM verbatim text and rationale:** direct excerpts from the NPRM preamble explaining ACF’s reasoning for the proposed change
- **Verbatim citations:** the full underlying statutory and regulatory text referenced in the comparison table

Table and citation language throughout is quoted directly from the Head Start Act, 45 CFR Part 1302, and the NPRM as published; it has not been paraphrased.

Quality Rating and Improvement Systems (QRIS)

HEAD START ACT

vs.

HEAD START PROGRAM PERFORMANCE STANDARDS (45 CFR §1302.31)

vs.

PROPOSED RULE: “REDUCING FEDERAL BURDEN FOR HEAD START PROGRAMS” (Aug. 7, 2026)

A Three-Way Comparison of QRIS Provisions

Overview

This document compares how the Head Start Act and the Head Start Program Performance Standards address state QRIS and what changes the Head Start NPRM makes to the regulations as relate to QRIS.

Side-by-Side Comparison

The NPRM would rescind the current regulation related to QRIS §1302.53(b)(2).

Dimension	Head Start Act (Statute)	Current Regs (45 CFR §1302.53(b)(2)	NPRM (Aug. 7, 2026)
Quality Rating and Improvement Systems	Not addressed — the Act neither mandates or encourages programs to participate in QRIS	§1302.53(b)(2): ‘a program with the exception of American Indian and Alaska Native programs, should participate in its State or local Quality Rating and Improvement System (QRIS), to the extent practicable...’	Rescinds the requirement to participate in QRIS.

NPRM: Verbatim Text

The NPRM strikes §1302.53(b)(2) completely.

NPRM Discussion:

"In proposing to rescind the regulations at current § 1302.53, this NPRM removes prescriptive guidance for how programs should operationalize their coordination and collaboration, including that programs should participate in state Quality Rating and Improvement Systems (QRIS).

With respect to QRIS specifically, while there is some evidence that participation in QRIS leads to increases in quality ratings particularly based on indicators or structural quality.⁶ Other academic research ^{7 8} has generally found weak or inconsistent association between QRIS ratings and children's developmental outcomes. Overall, there is not clear evidence that the QRIS infrastructure and strategies developed by states have had a meaningful impact on driving quality that produces child outcomes. Under the proposed regulations, programs would retain the flexibility to participate in their State or local QRIS and share relevant data with state systems, as long as doing so does not violate any state or Federal statutes or regulations, but the regulations would no longer tell programs they should participate. These proposed changes to regulations on Community Engagement greatly reduce duplication between the regulations and the Act and restore needed flexibility to programs to make determinations on how to coordinate with state partners and systems."

Research cited above:

⁶ Gomez, C. J., Whitaker, A. A., & Cannon, J. S. (2023). Do early care and education programs improve when enrolled in quality rating and improvement systems? Longitudinal evidence from one system. *Early Education and Development*, 34(5), 1236–1253. <https://doi.org/10.1080/10409289.2022.2105624>.

⁷ Markowitz, A. J., Bassok, D., & Player, D. (2020). Simplifying quality rating systems in early childhood education. *Children and Youth Services Review*, 112, 104947. <https://doi.org/10.1016/j.chilyouth.2020.104947>.

⁸ Hong, S. L. S., Howes, C., Marcella, J., Zucker, E., & Huang, Y. (2015). Quality rating and improvement systems: Validation of a local implementation in LA County and children's school-readiness. *Early Childhood Research Quarterly*, 30(Part B), 227–240. <https://doi.org/10.1016/j.ecresq.2014.05.001>.

Verbatim Citations

Full regulatory text underlying the comparison above.

Regulation: §1302.53 Community partnerships and coordination with other early childhood and education programs.

(b)(2) Quality Rating and Improvement Systems. A program, with the exception of American Indian and Alaska Native programs, should participate in its State or local Quality Rating and Improvement System (QRIS), to the extent practicable, if a State or local QRIS has a strategy to support Head Start participation without requiring programs to duplicate existing documentation from Office of Head Start oversight.

Public comment period

HEAD START ACT VS. REGULATIONS VS. NPRM

The NPRM's 60-day public comment period is open through October 6, 2026. Comments can be submitted through the Federal Register page for RIN 0970-AD30 at [regulations.gov](https://www.regulations.gov). Submitted comments are posted publicly and unedited, so commenters should avoid including personal or sensitive information.