



HEAD START ACT vs. REGULATIONS vs. NPRM

A Comparison for Policy Staff and Advocates - Teacher & Staff Credential / Education Requirements

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.

Teacher & Staff Credential / Education Requirements

HEAD START ACT

VS.

HEAD START PROGRAM PERFORMANCE STANDARDS (45 CFR §1302.91)

VS.

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

A Three-Way Comparison of Teacher and Staff Credential / Education Requirements

Overview

This document compares how the Head Start Act, the current Head Start Program Performance Standards, and the August 7, 2026 NPRM (“Reducing Federal Burden for Head Start Programs”) each address teacher and staff credential/education requirements.

Central Points: (1) While the Head Start statute sets very specific requirements for teachers, assistant teachers, and curriculum specialists, the statute has no such detailed credential/education requirement for other positions in a Head Start program. The regulations have created several role-specific requirements covering directors, fiscal officers, health professionals, coaches, and family child care specialists that the statute never mentions. The NPRM seeks to remove the requirements that are not detailed in statute. (2) While the NPRM removes several provisions not based in statute, it proposes to create a new provision (not based in statute) that would bar grantees from requiring or incentivizing degrees/credentials unless they can demonstrate that such educational attainment is necessary for the position based on specified skills that can only be acquired through a particular postsecondary education pathway.

Side-by-Side Comparison

Dimension	Head Start Act (Statute)	Current Regs (45 CFR §1302.91)	NPRM (Aug. 7, 2026)
Classroom teacher	Sec. 648A(a)(2)(A): At least 50% of Head Start teachers nationwide in center-based programs must have a BA or advanced degree in early childhood education (or equivalent coursework + preschool teaching experience).	§1302.91(e)(2)(i): restates statute.	Removes regulation. Statutory provisions stand.

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Dimension	Head Start Act (Statute)	Current Regs (45 CFR §1302.91)	NPRM (Aug. 7, 2026)
	Sec. 648A(a)(3): Classroom teachers not meeting the BA degree above, must have an AA in early childhood education (or equivalent AA coursework + preschool teaching experience); or a BA admitted into a Teach for America program, passed the equivalent of Praxis II in early childhood, and participated in a TFA summer institute and receiving PD support from TFA.	§1302.91(e)(2)(ii): restates statute.	
Education coordinators / curriculum specialists	Sec. 648A(a)(2)(B)(i): must have a BA or advanced degree in early childhood education (or equivalent + experience), plus capacity to assist other teachers with curriculum.	§1302.91(d)(2): program must ensure staff and consultants that serve as education managers or coordinators, including those that serve as curriculum specialists, have a baccalaureate or advanced degree in early childhood education or a baccalaureate or advanced degree and equivalent coursework in early childhood education with early education teaching experience. ●	Removes regulation. Statutory provisions stand.
Assistant teachers	Sec. 648A(a)(2)(B)(ii): must have at least a CDA credential, OR be enrolled in an associate/baccalaureate program, OR be enrolled in a CDA program to complete within 2 years.	§1302.91(e)(3): restates statute.	Removes regulation. Statutory provisions stand.

HEAD START ACT VS. REGULATIONS VS. NPRM

Dimension	Head Start Act (Statute)	Current Regs (45 CFR §1302.91)	NPRM (Aug. 7, 2026)
Teacher in-service / professional development hours	Sec. 648A(a)(5): each Head Start teacher must attend at least 15 clock hours of professional development per year, described as high-quality, sustained, and classroom-focused. Sec. 637(24): provides a very detailed definition of professional development which includes the acquisition of content knowledge and teaching strategies regarding early language and literacy, early mathematics, early science, cognitive skills, approaches to learning, creative arts, physical health and development, and social and emotional development linked to school readiness; advancing their understanding of effective instructional strategies that are based on scientifically valid research (a term also defined in statute) and aligned with the Head Start Child Development Framework. Sec. 648A(f): each Head Start must create, in consultation with an employee, a professional development plan for all full-time Head Start employees who provide direct services to children and ensure such plans are regularly evaluated for their impact on teacher and staff effectiveness.	§1302.92(b)(1): restates statute on 15 clock hours. No standalone regulatory counterpart for definition of professional development.	Removes regulation. Statutory provisions stand.

HEAD START ACT VS. REGULATIONS VS. NPRM

Dimension	Head Start Act (Statute)	Current Regs (45 CFR §1302.91)	NPRM (Aug. 7, 2026)
		1302.92: contains an extensive set of provisions related to training and professional development for all staff consultants and volunteers not found directly in statute.	Removes regulation. Statutory provisions stand.
Mentor Teachers/Coaches	Sec. 648A(b)(1): defines the role of mentor teacher. Sec. 648A(b)(2) stipulates that the Secretary shall provide technical assistance and encouragement on the use of mentor teachers. There is no statutory definition or mention of coaches; however, it appears that the regulations created for coaches were meant to implement the statutory concept of mentor teachers.	No current regulation directly addresses the role of mentor teacher. This role appears to have been subsumed by the current regulations related to coaching. §1302.91(f): coaches must have a minimum baccalaureate degree in early childhood education or a related field — a regulatory requirement with no direct statutory counterpart.	Removes coaching regulation. Statutory provisions for mentors stand.
Family Service Workers	Sec. 645A(c): No credential requirements in statute. Secretary, in coordination with	1302.91(e)(7): family services staff must within 18 months of hire have a	Removes regulation.

HEAD START ACT VS. REGULATIONS VS. NPRM

Dimension	Head Start Act (Statute)	Current Regs (45 CFR §1302.91)	NPRM (Aug. 7, 2026)
	concerned public and private organizations, is to examine the issues of standards and training for family service workers.	credential or certification in social work, human services, family services, counseling or a related field.	
Infant/toddler teachers (Early Head Start)	Sec. 645A(h): All EHS center-based teachers must have at minimum a CDA credential (or equivalent) and be trained in early childhood development with a focus on infant/toddler development.	§1302.91(e)(1): restates statute.	Removes regulation. Statutory provisions stand.
Home visitors	Sec. 645A(i): directs the Secretary to establish training/qualification/conduct standards with specific content areas listed – strengths-based parent education, early childhood development, emergent literacy, ascertaining needed health and developmental services. No specific credential named in statute.	§1302.91(e)(6): home visitors must have, at minimum, a home-based CDA (or comparable credential) or equivalent coursework as part of an associate's/bachelor's degree, plus demonstrated competency in home-based learning delivery.	Removes regulation.
Head Start director	No statutory credential/degree requirements for HS directors.	§1302.91(b): Directors must have, at minimum, a baccalaureate degree plus experience in staff supervision, fiscal management, and administration – a regulatory requirement with no direct statutory counterpart.	Removes regulation.
Fiscal officer	No statutory credential/degree requirements for fiscal officers.	§1302.91(c): fiscal officer must be a certified public accountant or have, at a minimum, a baccalaureate degree in accounting, business, fiscal management, or a related field – a regulatory requirement with no statutory counterpart.	Removes regulation.

HEAD START ACT VS. REGULATIONS VS. NPRM

Dimension	Head Start Act (Statute)	Current Regs (45 CFR §1302.91)	NPRM (Aug. 7, 2026)
Family/health/disabilities management staff degree requirement	No statutory credential/degree requirements for these positions.	§1302.91(d)(1): staff responsible for management and oversight of family services, health services, and services to children with disabilities must have a baccalaureate degree, preferably related to one or more of the disciplines they oversee .	Removes regulation.
Health professionals	No statutory credential/degree requirements for health professionals.	§1302.91(d)(8): health procedures/mental health services must be performed only by a licensed or certified professional; nutrition services must use registered dietitians/nutritionists — a regulatory requirement with no direct statutory counterpart.	Removes regulation.
New: restriction on requiring postsecondary credentials (skills-based hiring)	Not in the Act.	Not in regulations.	Proposed §1301.12(c): ‘programs may not require or incentivize the attainment of postsecondary education credits, hours, or credentials unless they can demonstrate that such educational attainment is necessary for the position based on specified skills that can only be acquired through a particular postsecondary education pathway. Programs must also provide explicit alternatives for demonstrating required skills, including assessments, industry-recognized credentials, or relevant work experience, rather than

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Dimension	Head Start Act (Statute)	Current Regs (45 CFR §1302.91)	NPRM (Aug. 7, 2026)
			relying solely on postsecondary educational attainment.'

NPRM: Preamble Text Staff Qualifications and Professional Development

NPRM: Administration's Rationale

"Under the proposed regulations, the Performance Standards would no longer contain any specific requirements for staff qualifications and professional development beyond those expressly required by statute. The Act requires programs to meet qualification requirements for specified staff positions, including those for education managers, education coordinators, mentor teachers, curriculum specialists, Head Start Preschool center-based teachers and assistant teachers, and Early Head Start center-based teachers (see Sec. 648A(a) and 645A(h)). All other staff qualification requirements that expand beyond statutory language currently found at § 1302.91 (e.g., Head Start director, Family Child Care provider, coaches, family service staff, and health professional qualification requirements) would be removed under the proposed regulations.

In a 2016 final rule, ACF introduced several additional staff qualification requirements beyond those expressly required by statute, in an effort to increase staff quality. However, at the time, ACF acknowledged that the available research did not support the need for specific degree requirements for certain positions. In general, education requirements of classroom staff are not strongly related to quality or child outcomes; research finds that increased qualifications do not consistently correlate to better child outcomes.[9] There is not significant or meaningful research on educational requirements of other staff roles and their relationship to quality or child outcomes. Upon further consideration, ACF believes that these non-statutory qualification requirements unnecessarily restrict grant recipients' ability to recruit and retain qualified staff and may limit programs' ability to respond to local workforce conditions and community needs. ACF now believes that, for positions not subject to qualification requirements in statute, grant recipients are better positioned to determine the combination of education, training, experience, competencies, and other qualifications necessary for effective service delivery. Removing these requirements will reduce barriers to hiring, expand the pool of qualified candidates, and provide important flexibilities for programs to determine the needed qualifications for staff positions and return qualifications to what Congress authorized in the Act.

Programs must continue to meet statutory requirements related to professional development for staff. This includes creating and regularly evaluating professional development plans for all full-time Head Start employees who provide direct services to children (Sec. 648A(f)). Programs must also continue to ensure each classroom teacher completes at least 15 clock hours of professional development annually (Sec. 648A(a)(5)). The Act continues to require Mentor Teachers (648A(b)) which align to coaching requirements. Programs also remain required

under statute to establish plans to assist limited English proficient children in making progress toward English language acquisition and toward attaining the knowledge, skills, abilities, and development described in section 641A(a)(1)(B) (Sec. 641(d)(K)).

In alignment with E.O. 14151 Ending Radical And Wasteful Government DEI Programs And Preferencing, the proposed revisions also eliminate prescriptive regulatory requirements that require staff, consultants, or contractors demonstrate familiarity with the ethnic backgrounds and heritages of families served; and require at least one classroom staff member or home visitor to speak the non-English language spoken by a majority of children in a class or program."

NPRM Preamble Text — New Skills-Based Hiring Provision, Proposed §1301.12(c)

"Finally the proposed regulation also introduces a new requirement in §1301.12(c) related to staff hiring considerations. Under this provision, programs may not require or incentivize the attainment of postsecondary education credits, hours, or credentials unless they can demonstrate that such educational attainment is necessary for the position based on specified skills that can only be acquired through a particular postsecondary education pathway. Programs must also provide explicit alternatives for demonstrating required skills, including assessments, industry-recognized credentials, or relevant work experience, rather than relying solely on postsecondary educational attainment. This requirement is intended to promote skills-based hiring practices, expand access to employment opportunities for individuals without traditional postsecondary credentials, and help ensure that education requirements are directly tied to the competencies needed to perform the job."

Verbatim Citations

Full statutory and regulatory text underlying the comparison above, organized by dimension.

1. Classroom Teacher Preschool

Statute — Sec. 648A(a)(2)(A)

"HEAD START TEACHERS.—The Secretary shall ensure that not later than September 30, 2013, at least 50 percent of Head Start teachers nationwide in center-based programs have— (i) a baccalaureate or advanced degree in early childhood education; or (ii) a baccalaureate or advanced degree and coursework equivalent to a major relating to early childhood education, with experience teaching preschool-age children."

Regulation — 45 CFR §1302.91(e)(2)(i)

"...no less than fifty percent of all Head Start teachers, nationwide, have a baccalaureate degree."

2. Education Coordinators / Curriculum Specialists

Statute — Sec. 648A(a)(2)(B)(i)

"Head Start education coordinators, including those that serve as curriculum specialists, nationwide in center-based programs— (I) have the capacity to offer assistance to other teachers in the implementation and adaptation of curricula to the group and individual needs of children in a Head Start classroom; and (II) have— (aa) a baccalaureate or advanced degree in early childhood education; or (bb) a baccalaureate or advanced degree and coursework equivalent to a major relating to early childhood education, with experience teaching preschool-age children."

Regulation — 45 CFR §1302.91(d)(2)

"Education management. As prescribed in section 648A(a)(2)(B)(i) of the Act, a program must ensure staff and consultants that serve as education managers or coordinators, including those that serve as curriculum specialists, have a baccalaureate or advanced degree in early childhood education or a baccalaureate or advanced degree and equivalent coursework in early childhood education with early education teaching experience."

3. Assistant Teachers

Statute — Sec. 648A(a)(2)(B)(ii)

"Head Start teaching assistants nationwide in center-based programs have— (I) at least a child development associate credential; (II) enrolled in a program leading to an associate or baccalaureate degree; or (III) enrolled in a child development associate credential program to be completed within 2 years."

Regulation — 45 CFR §1302.91(e)(3)

"A program must ensure Head Start [preschool] assistant teachers, at a minimum, [either]: have a child development associate (CDA) credential or a state-awarded certificate that meets or exceeds the requirements for a CDA credential, are enrolled in a program that will lead to an associate or baccalaureate degree; or, are enrolled in a CDA credential program to be completed within two years of the time of hire."

4. Teacher In-Service / Professional Development Hours

Statute — Sec. 648A(a)(5)

"TEACHER IN-SERVICE REQUIREMENT.—Each Head Start teacher shall attend not less than 15 clock hours of professional development per year. Such professional development shall be high-quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom, and regularly evaluated by the program for effectiveness."

Statute — Sec. 637(24)

"The term "professional development" means high-quality activities that will improve the knowledge and skills of Head Start teachers and staff, as relevant to their roles and functions, in program administration and the provision of services and instruction, as appropriate, in a manner that improves service delivery to enrolled children and their families, including activities that— (A) are part of a sustained effort to improve overall program quality and outcomes for enrolled children and their families; (B) are developed or selected with extensive

participation of administrators and teachers from Head Start programs; (C) are developmentally appropriate for the children being served; (D) include instruction in ways that Head Start teachers and staff may work more effectively with parents, as appropriate; (E) are designed to give Head Start teachers and staff the knowledge and skills to provide instruction and appropriate support services to children of diverse backgrounds, as appropriate; (F) may include a 1-day or short-term workshop or conference, if the workshop or conference is consistent with the goals in the professional development plan described in section 648A(f) and will be delivered by an institution of higher education or other entity, with expertise in delivering training in early childhood development, training in family support, and other assistance designed to improve the delivery of Head Start services; and (G) in the case of teachers, assist teachers with— (i) the acquisition of the content knowledge and teaching strategies needed to provide effective instruction and other school readiness services regarding early language and literacy, early mathematics, early science, cognitive skills, approaches to learning, creative arts, physical health and development, and social and emotional development linked to school readiness; (ii) meeting the requirements in paragraphs (1) and (2) of section 648A(a), as appropriate; (iii) improving classroom management skills, as appropriate; (iv) advancing their understanding of effective instructional strategies that are— (I) based on scientifically valid research; and (II) aligned with— (aa) the Head Start Child Outcomes Framework developed by the Secretary and, as appropriate, State early learning standards; and (bb) curricula, ongoing assessments, and other instruction and services, designed to help meet the standards described in section 641A(a)(1); (v) acquiring the knowledge and skills to provide instruction and appropriate language and support services to increase the English language skills of limited English proficient children, as appropriate; or (vi) methods of teaching children with disabilities, as appropriate.

Statute — Sec. 645A(f)

“PROFESSIONAL DEVELOPMENT PLANS.—Each Head Start agency and program shall create, in consultation with an employee, a professional development plan for all full-time Head Start employees who provide direct services to children and shall ensure that such plans are regularly evaluated for their impact on teacher and staff effectiveness. The agency and the employee shall implement the plan to the extent feasible and practicable.”

Regulation — 45 CFR §1302.91(a)

“A program must ensure all staff, consultants, and contractors engaged in the delivery of program services have sufficient knowledge, training and experience, and competencies to fulfill the roles and responsibilities of their positions and to ensure high-quality service delivery in accordance with the program performance standards. A program must provide ongoing training and professional development to support staff in fulfilling their roles and responsibilities. (See also §1302.92, Training and professional development, a separate regulatory section.)”

Regulation — 45 CFR §1302.92

“(a) A program must provide to all new staff, consultants, and volunteers an orientation that focuses on, at a minimum, the goals and underlying philosophy of the program and on the ways they are implemented.

(b) A program must establish and implement a systematic approach to staff training and professional development designed to assist staff in acquiring or increasing the knowledge and skills needed to provide high-quality, comprehensive services within the scope of their job

responsibilities, and attached to academic credit as appropriate, and integrated with employee engagement practices in accordance with § 1302.101(a)(2). At a minimum, the system must include: (1) Staff completing a minimum of 15 clock hours of professional development per year. For teaching staff, such professional development must meet the requirements described in section 648A(a)(5) of the Act, and includes creating individual professional development plans as described in section 648A(f) of the Act; (2) Annual training on mandatory reporting of suspected or known child abuse and neglect, that complies with applicable Federal, State, local, and Tribal laws; (3) Annual training on positive strategies to understand and support children's social and emotional development, such as tools for managing children's behavior; (4) Training for child and family services staff on best practices for implementing family engagement strategies in a systemic way, as described throughout this part; (5) training for child and family services staff, including staff that work on family services, health, and disabilities, that builds their knowledge, experience, and competencies to improve child and family outcomes; and, (6) Research-based approaches to professional development for education staff, that are focused on effective curricula implementation, knowledge of the content in Head Start Early Learning Outcomes Framework: Ages Birth to Five, partnering with families, supporting children with disabilities and their families, providing effective and nurturing adult-child interactions, supporting dual language learners as appropriate, addressing challenging behaviors, preparing children and families for transitions (as described in subpart G of this part), and use of data to individualize learning experiences to improve outcomes for all children.

(c) A program must implement a research-based, coordinated coaching strategy for education staff that: (1) Assesses all education staff to identify strengths, areas of needed support, and which staff would benefit most from intensive coaching; (2) At a minimum, provides opportunities for intensive coaching to those education staff identified through the process in paragraph (c)(1) of this section, including opportunities to be observed and receive feedback and modeling of effective teacher practices directly related to program performance goals; (3) At a minimum, provides opportunities for education staff not identified for intensive coaching through the process in paragraph (c)(1) of this section to receive other forms of research-based professional development aligned with program performance goals; (4) Ensures intensive coaching opportunities for the staff identified through the process in paragraph (c)(1) of this section that: (i) Align with the program's school readiness goals, curricula, and other approaches to professional development; (ii) Utilize a coach with adequate training and experience in adult learning and in using assessment data to drive coaching strategies aligned with program performance goals; (iii) Provide ongoing communication between the coach, program director, education director, and any other relevant staff; and, (iv) Include clearly articulated goals informed by the program's goals, as described in §1302.102, and a process for achieving those goals; and, (5) Establishes policies that ensure assessment results are not used to solely determine punitive actions for staff identified as needing support, without providing time and resources for staff to improve.

(d) If a program needs to develop or significantly adapt their approach to research-based professional development to better meet the training needs of education staff, such that it does not include the requirements in paragraph (c) of this section, the program must partner with external early childhood education professional development experts. A program must assess whether the adaptation adequately supports staff professional development, consistent with the process laid out in subpart J of this part."

5. Mentor Teachers/Coaches

Statute – Mentor Teachers – Sec. 648A(b)(1) and (2)

“(1) DEFINITION; FUNCTION.—For purposes of this subsection, the term “mentor teacher” means an individual responsible for observing and assessing the classroom activities of a Head Start program and providing on-the-job guidance and training to the Head Start program staff and volunteers, in order to improve the qualifications and training of classroom staff, to maintain high quality education services, and to promote career development, in Head Start programs. (2) REQUIREMENT.—In order to assist Head Start agencies in establishing positions for mentor teachers, the Secretary shall—(A) provide technical assistance and training to enable Head Start agencies to establish such positions; (B) give priority consideration, in providing assistance pursuant to subparagraph (A), to Head Start programs that have substantial numbers of new classroom staff or that are experiencing difficulty in meeting applicable education standards; (C) encourage Head Start programs to give priority consideration for such positions to Head Start teachers at the appropriate level of career advancement in such programs; and (D) promote the development of model curricula, designed to ensure the attainment of appropriate competencies of mentor teachers in Head Start programs.”

Statute – Coaches.

"Not addressed."

Regulation Coaches – 45 CFR §1302.91(f)

"Coaches. A program must ensure coaches providing the services described in §1302.92(c) have a minimum of a baccalaureate degree in early childhood education or a related field."

6. Family Service Workers

Statute – Sec. 648A(c)

"FAMILY SERVICE WORKERS.—To improve the quality and effectiveness of staff providing in-home and other services (including needs assessment, development of service plans, family advocacy, and coordination of service delivery) to families of children participating in Head Start programs, the Secretary, in coordination with concerned public and private agencies and organizations examining the issues of standards and training for family service workers, shall— (1) review and, as necessary, revise or develop new qualification standards for Head Start staff providing such services; (2) review, and as necessary, revise or develop maximum caseload requirements, as suggested by best practices; (3) promote the development of model curricula (on subjects including parenting training and family literacy) designed to ensure the attainment of appropriate competencies by individuals working or planning to work in the field of early childhood and family services; (4) promote the establishment of a credential that indicates attainment of the competencies and that is accepted nationwide; and (5) promote the use of appropriate strategies to meet the needs of special populations (including populations of limited English proficient children)."

Regulation – 45 CFR §1302.91(e)(7)

"Family services staff qualification requirements. A program must ensure staff who work directly with families on the family partnership process hired after November 7, 2016, have within eighteen months of hire, at a minimum, a credential or certification in social work, human services, family services, counseling or a related field."

7. Infant/Toddler Teachers (Early Head Start)

Statute — Sec. 645A(h)

"CENTER-BASED STAFF.—The Secretary shall— (1) ensure that, not later than September 30, 2010, all teachers providing direct services to children and families participating in Early Head Start programs located in Early Head Start centers, have a minimum of a child development associate credential, and have been trained (or have equivalent coursework) in early childhood development; and (2) establish staff qualification goals to ensure that not later than September 30, 2012, all such teachers have been trained (or have equivalent coursework) in early childhood development with a focus on infant and toddler development."

Regulation — 45 CFR §1302.91(e)(1)

"As prescribed in section 645A(h) of the Act, a program must ensure center-based teachers that provide direct services to infants and toddlers... have: A minimum of a Child Development Associate (CDA)... or comparable credential; and Been trained or have equivalent coursework in early childhood development with a focus on infant and toddler development."

8. Home Visitors

Statute — Sec. 645A(i)(1)

"HOME VISITOR STAFF STANDARDS.—In order to further enhance the quality of home visiting services provided to families of children participating in home-based, center-based, or combination program options under this subchapter, the Secretary shall establish standards for training, qualifications, and the conduct of home visits for home visitor staff in Early Head Start programs."

Regulation — 45 CFR §1302.91(e)(6)

"Have a minimum of a home-based child development associate (CDA) or comparable credential or equivalent coursework as part of an associate's or bachelor's degree. ... Demonstrate competency to plan and implement home-based learning experiences that ensure effective implementation of the home visiting curriculum and promote children's progress across the standards described in the Head Start Early Learning Outcomes Framework: Ages Birth to Five, including for children with disabilities and dual language learners, as appropriate, and to build respectful, culturally responsive, and trusting relationships with families."

9. Head Start Director

Statute

"Not addressed in the statute at this level of specificity."

Regulation — 45 CFR §1302.91(b)

"Head Start director. A program must ensure a Head Start director hired after November 7, 2016, has, at a minimum, a baccalaureate degree and experience in supervision of staff, fiscal management, and administration."

10. Fiscal Officer

Statute

"Not addressed in the statute."

Regulation — 45 CFR §1302.91(c)

"Fiscal officer. A program must assess staffing needs in consideration of the fiscal complexity of the organization and applicable financial management requirements and secure the regularly scheduled or ongoing services of a fiscal officer with sufficient education and experience to meet their needs."

11. Family/Health/Disabilities Management Staff Degree Requirement

Statute

"Not addressed in the statute."

Regulation — 45 CFR §1302.91(d)(1)

"A program must ensure staff responsible for management and oversight of family services, health services, and services to children with disabilities hired after November 7, 2016 have, at a minimum, a baccalaureate degree, preferably related to one or more of the disciplines they oversee."

12. Health Professionals

Statute

"Not addressed at this level."

Regulation — 45 CFR §1302.91(d)(8)

"Health professional qualification requirements. (i) A program must ensure health procedures are performed only by a licensed or certified health professional. ... A program must use staff or consultants to support nutrition services who are registered dietitians or nutritionists with appropriate qualifications."

13. Restriction on Requiring Postsecondary Credentials (Skills-Based Hiring)

Statute —

"Not addressed."

Current Regulation

"No such restriction in current regulations."

Proposed New Regulation § 1301.12(c)

"(c) Hiring considerations. Programs shall not require or incentivize the attainment of postsecondary education credits, hours, or credentials unless the program demonstrates that such educational attainment is necessary for the position based on specified skills required for the position that can only be attained through a specific postsecondary education pathway. Programs shall provide explicit alternatives to postsecondary education for demonstrating required skills, such as through assessments, industry-recognized credentials, or relevant work experience."

Public comment period

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.