



NPRM: “REDUCING FEDERAL BURDEN FOR HEAD START PROGRAMS” COMMENT TEMPLATE

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

INSTRUCTIONS

One of the most important things you can do as child care and Head Start advocates is to submit public comments, particularly comments that reflect your organization’s primary concerns. As organizations and individuals with unique expertise about child care, in your written comments please include details about how the proposed changes may impact:

- workforce stability, recruitment and retention,
- families’ access to care, and
- the child care field in your state and community overall.

The language below is a template. Please customize as you see fit. Sections in brackets are meant to be customized.

Submit your final customized comment letter online by October 6, 2026.

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The Honorable Robert F. Kennedy, Jr.
Secretary United States Department of Health and Human Services
200 Independence Ave, SW Washington, DC 20201

RE: Docket number ACF-2026-0595 / RIN number 0970-AD30

Dear Secretary Kennedy,

[ORGANIZATION NAME or I, if writing as an individual] appreciate the opportunity to comment on the Administration for Children and Families' notice of proposed rulemaking, Reducing Federal Burden for Head Start Programs. While ***[we / I / Organization Name]*** are aligned with the goal of reducing unnecessary burdens and empowering local programs, ***[we / I / Organization Name]*** are writing to express ***[our / my]*** deep concerns about the proposed changes.

[Add information here about you or your organization. Please consider including:

- ***Your experience with Head Start programs;***
- ***Why Head Start is important to you;***
- ***Your role and expertise in the early childhood system.]***

As an ***[organization/individual]*** committed to advancing the well-being of children, families, and early childhood educators, ***[we / I / Organization Name]*** support thoughtful efforts to reduce unnecessary administrative burdens and ensure federal programs continue to evolve to meet the needs of communities. But any changes to Head Start should be guided by a simple, but critical, principle: whether they strengthen outcomes for the children and families the program was designed to serve. Head Start has long provided comprehensive supports that promote healthy development, learning, and family stability, particularly for children facing the greatest barriers to opportunity.

Too many of the proposed changes undermine the very reasons that Head Start produces real and measurable benefits for children and families. To that end, ***[we / I / Organization Name]*** offer the following comments on several key provisions.

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[Note: Please review and select the areas below that you would like to include in your comment letter.]

The Administrative Cap: The proposed rule would reduce the current cap on administrative expenses, from 15% to 5%. Only a very small percentage of Head Start grantees currently operate at or below 5% administrative costs. As a result, many programs may need to reclassify, reduce, or redirect funding to comply, leading to significant changes in how Head Start programs are administered and managed. For some Head Start programs, this cap may mean that they are no longer able to operate the same level of wrap around services or keep their programs running at all. Furthermore, the cap may restrict, rather than encourage, flexibility if programs cannot fund the services that local leadership determine are essential for their programs due to the 5% cap.

[Add in any community-specific examples. Consider including:

- Are there examples of administrative expenses that are essential to programs in your area?*
- What would this cap mean for the Head Start programs in your area?*
- Would they be able to continue their operations?]*

Ratios and Group Sizes: The proposed rule would remove existing Head Start requirements related to staff-child ratios and group-size thresholds and instead direct programs to follow their state's child care licensing requirements. Many state licensing standards allow larger group sizes and higher ratios than current Head Start requirements, so this change could permit significantly larger classroom groupings in some settings.

[Add in specific details about the ratio and group size requirements in your state. Consider including:

- What is the ratio requirement in your state? How is it different from the current HSPPS requirements for ratios?*
- If Head Start programs transition to the state licensure requirements, what would this mean for classroom instruction in those programs?*
- What impacts would you anticipate for those classrooms?*
- What impacts would you anticipate on the workforce in those programs?*
- Other concerns about the potential impacts to programs in your area]*

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Discipline: The proposed rule would remove the current federal prohibitions on suspending or expelling children from Head Start programs and instead require programs to follow applicable state and local licensing requirements related to discipline. Relatively few states have comprehensive limits on suspension and expulsion in child care settings, so *[we / I / Organization Name]* are concerned about the removal of the federal protections, particularly in regard to continued access to care for children displaying challenging behaviors.

[Add in specific details about the regulations regarding suspension and discipline in your state. Consider including:

- What is the regulation regarding suspension and expulsion in your state, if there is one? How is it different from the current HSPPS requirements?*
- If Head Start programs transition to the state licensure requirements in your state, what would this mean for children displaying challenging behaviors in those programs?*
- What impacts would you anticipate for those children and families?*
- What impacts would you anticipate on the workforce in those programs?*
- Other concerns about the potential impacts to programs in your area]*

English-Only Instruction: The proposed rule would require Head Start instruction to be conducted in English and remove existing standards related to serving dual-language learners (DLLs). Nearly 40% of the children enrolled in Head Start are DLLs, and this change raises concerns about their social development and language acquisition. Research shows that DLLs who receive high-quality instruction in both their home language, alongside English, outperform their DLL peers who attend English-only models. The English-only requirement may also limit communication with families and create additional challenges related to enrollment and engagement.

[Add in specific details about the language needs of the children and families in your area. Consider including:

- What is the population of dual language learners in your area? What are their home languages?*
- What successes have you seen from dual language instruction?*
- What impacts would you anticipate for dual language learner in an English-only Head Start program?*

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- *What impacts would you anticipate for the families of dual language learner in an English-only Head Start program, specifically as it relates to outreach and enrollment?*
- *Other concerns about the potential impacts to programs in your area]*

Teacher and Staff Qualifications: The proposed rule would remove qualification and professional development requirements for many Head Start staff positions beyond those specifically required in statute. This includes eliminating qualification requirements for positions such as Head Start directors, family child care providers, coaches, and others. The proposal would also prohibit grantees from requiring or incentivizing additional degrees or credentials for these roles. The removal of qualification requirements, combined with restrictions on encouraging additional credentials, may negatively impact workforce recruitment, retention, and career advancement opportunities. The proposal could further exacerbate existing staffing challenges across the early childhood sector.

[Add in specific details about the importance of having highly qualified and compensated staff in the Head Start programs in your area. Consider including:

- *What is the potential impact of removing the qualification requirements for Head Start Directors?*
- *What is the potential impact of removing the qualification requirements for family child care providers?*
- *Would the removal of these requirements have the intended stated goal of making it easier to hire for these positions?*
- *What impact would the new prohibition of requiring or incentivizing degrees or credentials for these roles, specifically for Head Start directors, have on programs in your area?*
- *What impact would the removal of the requirement and the new prohibition of incentivizing and requiring degrees or credentials have on the Head Start workforce? On the overall child care workforce in your community?*
- *Other concerns about the potential impacts to programs in your area]*

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[Add information about any of the other key areas you are concerned about. You may consider including information about 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.]

[We / I / Organization Name] believe it is possible to increase flexibility for local programs, reduce burdensome requirements, and expand access without weakening the standards and supports that make Head Start programs effective. Protections that safeguard children's health and safety, policies that support a qualified and stable workforce, and services that connect families to developmental, health, and other critical resources are fundamental components of a high-quality early childhood system, not unnecessary regulatory burdens.

[Add your closing thoughts about the action/s you would like the Administration to take regarding this proposal.]

Thank you for considering *[my/our]* feedback.

Name

Institution

Address

Phone Number