



NOTE: This comment contains a correction

October 6, 2026

The Honorable Robert F. Kennedy Jr.
Secretary, United States Department of Health and Human Services

Federal Register Document Number: ACF-2026-0595/RIN 0970-AD30

Re: *Reducing Federal Burden for Head Start Programs*

Dear Secretary Kennedy:

Head Start is a vital early education and comprehensive family support program serving some of the nation's most vulnerable families. Head Start's ability to offer high-quality care that alleviates poverty and enhances long-term life outcomes relies heavily on a comprehensive set of program performance standards, which establish a consistent framework governing service delivery, participant eligibility, and the high standard of care required to generate the positive benefits long demonstrated by its programs. Importantly, indexing many of the Head Start standards to state licensing standards risks undermining the purpose of the program: state licensing standards set a floor for safe operating practices, while Head Start standards aim to curate ideal early learning environments and supportive services that mitigate poverty and set children up for success.

The Center for American Progress—an independent, nonpartisan policy institute that is dedicated to improving the lives of all Americans—strongly urges the Department to withdraw the proposed regulation in its entirety. In particular, we attest that the proposed rule:

- I. Risks violating existing Head Start statute;
- II. Contradicts decades of research and experience underlying Head Start's impact;
- III. Undermines Head Start's core principles and values—such as a national commitment to support for young children that does not depend on where a child grows up; and
- IV. Would destabilize both Head Start programs and the communities they serve by excluding large numbers of children from the program and limiting access to necessary services.

Background and Introduction

For more than 60 years, Head Start has offered high-quality education and support services to some of the nation's most vulnerable families, including those living in poverty, children in foster care, and those experiencing homelessness. It has served more than 40 million children since

its founding and, today, reaches nearly 800,000.¹ From its beginnings,² Head Start was designed to improve the health and wellbeing of children in poverty,³ helping their emotional and social development, increasing their cognitive skills, and supporting the whole family to ensure those positive outcomes would endure.⁴ The mandate to deliver on those outcomes is rooted in a community-based assessment to ensure that each program can meet the unique needs of the population it serves, and begins with a medical evaluation, dental examination, and developmental screening to provide the participating child with the services they need to thrive.

The Head Start Program Performance Standards (HSPPS) are essential to guiding how those services are delivered, from the start of a family's enrollment.⁵ They promote research-based educational programming, attendance and inclusion practices, family partnerships, and staff training and accountability. They are essentially the roadmap for promoting program quality and compliance, and ensure that the positive outcomes families experience as a result of their participation are consistent across programs and geography. The resulting benefits resonate with communities across the political spectrum, with research finding strong bipartisan support for Head Start.⁶ Voters strongly favor the educational, health, and developmental services that Head Start offers to participating families, and recognize the unique and critical role it plays particularly in rural communities.⁷

The HSPPS were created in 1975 to establish consistent quality, strong accountability, and holistic services across all local grantees, responding to early 1970s evaluations that revealed significant quality discrepancies among local projects and demonstrated the clear need for a unified federal structure to safeguard children's education, health, and nutrition under the Head Start Act.⁸ Far from introducing programmatic efficiency and expanding enrollment, eliminating

¹ Casey Peeks and Allie Schneider, "5 Things to Know About Head Start" (Washington, Center for American Progress: 2025), available at <https://www.americanprogress.org/article/5-things-to-know-about-head-start/>

² US. Department of Health, Education, and Welfare Office of Child Development, "Recommendations for a Head Start Program" (Washington: 1972), available at <https://headstart.gov/sites/default/files/pdf/cooke-report.pdf>

³ National Head Start Association, "the Power of a Head Start for Every Child," available at <https://nhsa.org/about-nhsa/our-impact/>

⁴ Hailey Gibbs, "Debunking Myths About Head Start: How the Program Promotes Opportunity and Strengthens Families, Communities, and Economies" (Washington, Center for American Progress: 2025), available at <https://www.americanprogress.org/article/debunking-myths-about-head-start-how-the-program-promotes-opportunity-and-strengthens-families-communities-and-economies/>

⁵ Administration for Children and Families, "Head Start Program Performance Standards: (Washington, U.S. Department of Health and Human Services: 2024), available at <https://headstart.gov/sites/default/files/pdf/performance-standards-final.pdf>

⁶ First Five Years Fund, "Head Start Polling Highlights 2025-26," August 5, 2026, available at <https://www.ffyf.org/2026/08/05/head-start-polling-highlights-2025-26/>

⁷ Casey Peeks and Allie Schneider, "5 Things to Know About Head Start."

⁸ National Head Start Association, "Head Start Program Performance Standards Basics," available at <https://nhsa.org/course/head-start-program-performance-standards/>

core program performance standards,⁹ as currently proposed, jeopardizes service quality, restricts access for vulnerable populations, and creates operational ambiguity for grantees and staff, thereby undermining the program's overall mandate, threatening its legacy for delivering a “gold standard of care,” and leaving thousands of children and their families behind.

I. The proposed rule risks undermining existing Head Start statute.

At the heart of the Head Start program is a “whole child” philosophy grounded in scientific research.¹⁰ Decades of evidence highlight that physical health, social-emotional growth, and warm and responsive caregiving are critical to ongoing development,¹¹ with complementary and interactive effects that bolster children’s cognitive and academic outcomes.¹² Head Start, specifically, has been found in longitudinal studies to support children’s language, literacy, and social emotional learning, and has even produced positive intergenerational benefits for participating children when they reach adulthood.¹³ Unlike state licensing requirements, which establish the baseline health and safety requirements that ensure children are adequately supervised while in the care of others, the Head Start model is designed to cultivate the *ideal* care and educational environments that produce lasting advantages in academic achievement, health, social well-being, and family financial stability.

The Head Start Act consequently requires participating agencies to deliver “comprehensive health, education, parental involvement, nutritional, social, and other services that will enable the children to attain their full potential and attain school readiness.”¹⁴ Under the Act, regulatory modifications that diminish the scope, quality, or variety of services available to participating families are prohibited. To maintain statutory compliance, Head Start agencies rely on the HSPPS as an operational guide for administering high-quality programming.

Although the proposed rule asserts that cutting regulatory guidance will reallocate approximately \$2.2 billion,¹⁵ regulations have no direct impact on Head Start’s overall budget, which must be approved annually by Congress and which has faced stagnant or declining funding over the

⁹ Federal Register, “Reducing Federal Burden for Head Start Programs,” August 7, 2026, available at <https://www.federalregister.gov/documents/2026/08/07/2026-16134/reducing-federal-burden-for-head-start-programs>

¹⁰ Legal information Institute, Cornell Law School, “42 U.S. Code § 9832 - Definitions,” available at <https://www.law.cornell.edu/uscode/text/42/9832>

¹¹ Pia Britto and others, “Nurturing Care: Promoting Early Childhood Development,” *Lancet*, 389(10084)(207): 91-102, available at <https://pubmed.ncbi.nlm.nih.gov/27717615/>

¹² Jack Shonkoff and Deborah Phillips, “From Neurons to Neighborhoods: The Science of Early Childhood Development,” National Research Council and Institute of Medicine Committee on Integrating the Science of Early Childhood Development, available at <https://pubmed.ncbi.nlm.nih.gov/25077268/>

¹³ Shantal Meek and others, “Lowering The Bar: An Analysis Of How Replacing Head Start Standards With State Child Care Licensing Weakens Early Learning Across The United States” (Children’s Equity Project: 2026), available at https://cep.asu.edu/sites/g/files/litvpz916/files/2026-08/Lowering%20the%20Bar%20An%20Analysis%20of%20How%20Replacing%20Head%20Start%20Standards%20with%20State%20Child%20Care%20Licensing%20Weakens%20Early%20Learning%20Across%20the%20United%20States%20%20%2812%29.pdf?_sp=c89e3afb-40d8-437f-b40e-2e2cb5dcafe7.1787164257348

¹⁴ See Head Start Act, available at <https://headstart.gov/policy/head-start-act>

¹⁵ Federal Register, “Reducing Federal Burden for Head Start Programs.”

past three years. Instead, it imposes regulatory changes that would compel local programs to slash operational overhead. Current federal policy, for instance, permits grantees to allocate up to 15 percent of their funds toward administrative expenses—covering staff compensation and benefits, transportation, professional development, auditing, and other general operations.¹⁶ Capping administrative expenditures at just 5 percent, as is stipulated in the proposed rule, severely compromises programs' capacity to maintain essential operational oversight, offer fair compensation, and ensure that the services children and families receive are high-quality.

It also does not account for the range of administrative expenses incurred across grantees based on their size and care type; a large, center-based program, for example, has considerably higher administrative costs than a smaller, home-based one. This proposed restriction on allowable administrative expenditures—funding that directly supports statutory compliance and high-quality service delivery—is especially alarming given the recent erosion of existing administrative infrastructure across Head Start programs, leaving many without adequate technical assistance in the wake of widespread regional office closures.¹⁷ In a recent survey of Head Start providers, nearly 80 percent reported an increase in administrative burden following the closure of regional offices.¹⁸ Among the findings:

- Ninety percent reported that their ongoing support has deteriorated under the current structure;
- Nearly half reported increased difficulty hiring or retaining qualified teaching staff;
- One-quarter cited that a reduction in staff support from the Office of Head Start has contributed to delays in communication with parents;
- Seventeen percent said the reduction in support has impacted their ability to purchase or repair equipment used for play or learning and 11 percent cited an impact on their ability to purchase or repair child safety or health equipment.

In the absence of explicit HSPPS guidance on teaching and learning, parent engagement, and comprehensive services, local programs would be forced to independently determine how to fulfill the statutory requirements mandated by the Head Start Act. Furthermore, timelines and service scope, which were once uniform, would now depend entirely on the discretion of individual grantees. Burdened by the administration's expectation of lower overall operational costs, these grantees will face severe challenges in maintaining high-quality service delivery, risking noncompliance with the Head Start Act's statutory requirements.

¹⁶ Head Start Policy and Regulations, "Part 1303—Financial and Administrative Requirements," available at <https://headstart.gov/policy/45-cfr-chap-xiii/part-1303-financial-administrative-requirements>

¹⁷ Allie Schneider, "Closures of Head Start Regional Offices Jeopardize Critical Services for Children and Families," Center for American Progress, April 29, 2025, available at <https://www.americanprogress.org/article/closures-of-head-start-regional-offices-jeopardize-critical-services-for-children-and-families/>

¹⁸ Amanda Geduld, "Head Start Providers Describe a System in Turmoil Amid Federal Cutbacks," Zero 2 Eight, August 19, 2026, available at <https://www.the74million.org/zero2eight/head-start-providers-describe-a-system-in-turmoil-amid-federal-cutbacks/>

Furthermore, while Congress explicitly mandated that any subsequent revisions to the HSPPS be evaluated against the standards established in 2007, the current proposed rule issued by HHS fails to offer a comparison between those 2007 regulatory benchmarks and the new requirements proposed under the NPRM. The agency also omits any analysis demonstrating how the rule, should it be finalized as written, would prevent the reduction or elimination of the service types, scope, or quality mandated by the 2007 standards. Consequently, this proposed rule risks directly violating Section 641A(a)(2)(C) of the Head Start Act.¹⁹

II. The proposed rule represents a full-scale attack on over sixty years of research foundational to the Head Start model.

The proposed rule²⁰ slashes Head Start standards by over 90 percent, removing requirements related to health and developmental screening requirements, along with core teaching, learning, and parent committee mandates. By replacing federal teaching standards with state child care licensing rules, class sizes are expected to increase for 80 percent of enrolled children²¹, reducing individualized attention that they need to support healthy learning and development, with particular risks for infants and toddlers.²² Additionally, removing federal health, safety, background check, and supervision standards shifts oversight to varying state laws, which will likely contribute to even more variable health outcomes for young children on a state-by-state basis.

The success of the Head Start program relies fundamentally on its comprehensive, clear, and uniform program performance standards. By establishing a uniform national baseline, these standards ensure consistency across thousands of operating programs, enabling effective federal oversight to safeguard safety, quality, and program integrity while providing predictable expectations for families moving across community and state borders. Furthermore, uniform national standards allow multi-community and multi-state grantees to operate under a single, consistent framework across all of their sites.

Children actively learn from birth,²³ making their relationships and environments during the early months and years particularly influential for supporting their overall cognitive, social, and physical wellbeing. Research shows that high-quality care and early learning environments are shaped by²⁴:

¹⁹ Head Start Policy and Regulations, “Sec. 641A Standards; Monitoring of Head Start Agencies and Programs,” available at

<https://headstart.gov/policy/head-start-act/sec-641a-standards-monitoring-head-start-agencies-programs>

²⁰ Federal Register, “Reducing Federal Burden for Head Start Programs.”

²¹ Shantal Meek and others, “Lowering The Bar: An Analysis Of How Replacing Head Start Standards With State Child Care Licensing Weakens Early Learning Across The United States.”

²² Head Start, “Why Is Individualizing Care Important for Infants and Toddlers?” available at <https://headstart.gov/teaching-practices/individualizing-care-infants-toddlers/why-individualizing-care-important-infants-toddlers>

²³ National Academies, “Transforming the Workforce for Children Birth Through Age 8: A Unifying Foundation National Academies of Sciences, Engineering, and Medicine” (Washington, The National Academies Press: 2015), available at <https://doi.org/10.17226/19401>

²⁴ Shantal Meek and others, “Lowering The Bar: An Analysis Of How Replacing Head Start Standards With State Child Care Licensing Weakens Early Learning Across The United States.”

- Strong family partners and parent engagement;
- Teacher competencies, scientifically-researched and developmentally-appropriate teaching and learning standards, and small ratios and group sizes (particularly for infants and toddlers);
- Rich and responsive adult-child interactions;
- Support for children’s social and emotional development free from harsh and punitive disciplinary practices;
- Connections to and coordination with other early childhood systems, including health, mental health, early intervention, and special education services for children with disabilities.

Rooted in these evidence-based guiding principles, the current Head Start Program Performance Standards are designed to maintain high quality, improve children’s long-term outcomes, and enhance family well-being—outcomes that the proposed rule threatens to undermine.

Impacts on teaching and learning standards.

The proposed rule eliminates the majority of standards governing teaching and learning, such as those for teacher training, coaching, and curricula.²⁵ The proposed rule also eliminates certain professional safeguards for non-education staff, such as limits on caseloads, and reduces the qualification requirements for staff that provide families with comprehensive services, such as home visiting, disability services, and other family supports.

Under the Elementary and Secondary Education Act, early education services provided before kindergarten using Title I funds are mandated to comply with Head Start’s educational standards.²⁶ Specifically, Title I Preschool Guidance specifies that Title I programs must adhere to HSPPS regulations in §1302 Subpart C.²⁷ These rules lay out essential minimum standards for education and child development, including learning environments, teaching practices, curricula, screening, and assessments. If the proposed NPRM is finalized and these regulations are removed, Title I-funded preschool programs will no longer be bound by requirements to provide developmentally, culturally, and linguistically appropriate instruction necessary to satisfy the Head Start Act’s school readiness mandate.

²⁵ Federal Register, “Reducing Federal Burden for Head Start Programs.”

²⁶ See Serving Preschool Children Through Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended, available at <https://www.ed.gov/media/document/non-regulatory-guidance-serving-preschool-children-through-title-i-part-a-of-esea-february-2024-16708.pdf>

²⁷ Head Start Program Performance Standards, “1302 Subpart C—Education and Child Development Program Services,” available at <https://headstart.gov/policy/45-cfr-chap-xiii/1302-subpart-c-education-child-development-program-services>

The existing standards outline the baseline credentialing requirements for Head Start staff, including teachers, assistant teachers, family child care providers, and home visitors,²⁸ as well as the basic competencies related to the Head Start Act's requirements for "planning and implementing learning experiences that advance the intellectual and physical development of young children... establishing and maintaining a safe, healthy learning environment; supporting the social and emotional development of children; and encouraging the involvement of the families of the children in a Head Start program and supporting the development of relationships between children and their families."²⁹

These standards ensure that programs provide for effective teaching practices, materials and space requirements for learning, along with standards for physical activity and rest.³⁰ The Secretary monitors Head Start program quality³¹ via the Classroom Assessment Scoring System (CLASS), a standardized classroom monitoring tool that enables the Office of Head Start to effectively assess teaching and learning performance across the domains of (1) emotional support; (2) classroom organization; and (3) instructional support, and helps programs ensure they understand and are able to meet their programmatic requirements.³² Removing these standards spelled out in the current HSPPS will make it more difficult for the Secretary to ensure that programs are satisfying the statutory demands of the Head Start Act and delivering high-quality instruction.

School readiness and healthy child development are fundamentally driven by developmentally appropriate learning experiences.³³ The success of Head Start relies on the competence, preparation, and administrative support provided to all staff—including both education and non-education personnel—to sustain professional practice that results in those learning experiences.³⁴ Eliminating key standards—including professional development, structured coaching, reasonable home visitor caseload limits, and qualification standards for non-teaching personnel—under the assumption that workforce reductions will yield cost savings directly compromises the Head Start framework. Removing safeguards for professional growth, staffing adequacy, and non-instructional qualifications threatens comprehensive service delivery and weakens the program's holistic family support structure. Absent robust qualifications and

²⁸ Head Start Program Performance Standards, "1302.91 Staff Qualifications and Competency Requirements," available at <https://headstart.gov/policy/45-cfr-chap-xiii/1302-91-staff-qualifications-competency-requirements>

²⁹ Head Start Act, "Sec. 648A Staff Qualifications and Development," available at <https://headstart.gov/policy/head-start-act/sec-648a-staff-qualifications-development>

³⁰ Legal Information Institute, Cornell Law School, "45 CFR § 1302.31 - Teaching and the Learning Environment," available at <https://www.law.cornell.edu/cfr/text/45/1302.31>

³¹ Legal Information Institute, Cornell Law School, "42 U.S. Code § 9836a - Standards; Monitoring Of Head Start Agencies And Programs," available at <https://www.law.cornell.edu/uscode/text/42/9836a>

³² Legal Information Institute, Cornell Law School, "45 CFR § 1305.2 - Terms," available at <https://www.law.cornell.edu/cfr/text/45/1305.2>

³³ National Association for the Education of Young Children, "DAP: Teaching to Enhance Each Child's Development and Learning," available at <https://www.naeyc.org/node/3812>

³⁴ National Academies, "Transforming the Workforce for Children Birth Through Age 8: A Unifying Foundation (Washington, The National Academies Press: 2015), available at <https://doi.org/10.17226/19401>

standards, programs risk offering less intentional, lower-quality instruction, ultimately weakening outcomes in cognitive skills, language acquisition, self-regulation, and social-emotional growth.

Impacts of reducing program duration.

Research demonstrates that multi-year, high-quality early childhood education yields significantly greater social and academic progress than single-year participation.³⁵ Specifically, studies examining Head Start reveal that children enrolled at younger ages achieve greater outcomes, including enhanced pre-reading skills, which are foundational for later literacy, compared with peers who enroll at age 4.³⁶ Program duration and timing are therefore critical, and dosage matters: extended exposure to high-quality instruction, earlier intervention services, and sustained peer interaction produce enduring benefits that persist well into development.³⁷

Beyond supporting child development, high-quality early education provides vital benefits for working parents.³⁸ Reliable, safe early learning environments, coupled with comprehensive family support and early interventions, empower parents to further their education, work longer hours, or advance their careers. Deprived of Head Start's essential services, eligible low-income families frequently lack viable alternatives, compromising their workforce participation and long-term financial stability, worsening material hardship.³⁹

Despite these proven benefits, the proposed rule eliminates mandatory preschool service duration standards, reverting instead to a baseline regulatory threshold established in 1994⁴⁰—32 years ago. HHS acknowledges that this change may force families to seek alternative care, potentially imposing "additional financial costs or lost work time." Yet, with nearly half of American children living in licensed child care deserts⁴¹ and the average annual

³⁵ Suh-Ruu Ou, Irma Arteaga, and Arthur Reynolds, "Dosage Effects in the Child-Parent Center PreK-to-3rd Grade Program: A Re-analysis in the Chicago Longitudinal Study," *Children and Youth Services Review* 101 (2019): 285-298, available at <https://www.sciencedirect.com/science/article/abs/pii/S019074091831154X>

³⁶ Jade Marcus Jenkins and others, "Head Start at ages 3 and 4 versus Head Start followed by state pre-k: Which is more effective?" *Educational Evaluation Policy Analysis*, 6(2015): 88-112, available at <https://pmc.ncbi.nlm.nih.gov/articles/PMC4827921/>

³⁷ Deborah Lowe Vandell and others, "Do Effects of Early Child Care Extend to Age 15 Years? Results From the NICHD Study of Early Child Care and Youth Development," *Child Development*, 81 (2010): 737-756, available at <https://pmc.ncbi.nlm.nih.gov/articles/PMC2938040/>

³⁸ Hailey Gibbs and Rasheed Malik, "Child Care Spending Generates Massive Dividends" (Washington, Center for American Progress: 2022), available at <https://www.americanprogress.org/article/child-care-spending-generates-massive-dividends/>

³⁹ Casey Peeks, "Project 2025 Would Eliminate Head Start, Severely Restricting Access to Child Care in Rural America," Center for American Progress, June 26, 2024, available at <https://www.americanprogress.org/article/project-2025-would-eliminate-head-start-severely-restricting-access-to-child-care-in-rural-america/>

⁴⁰ Federal Register, "Reducing Federal Burden for Head Start Programs."

⁴¹ Hailey Gibbs, "America's Child Care Crisis Leaves Many Families Without Access to Licensed Care," Center for American Progress, July 9, 2026, available at <https://www.americanprogress.org/article/americas-child-care-crisis-leaves-many-families-without-access-to-licensed-care/>

cost of care surpassing \$13,180,⁴² qualifying Head Start families rarely have other options. This scarcity is particularly acute in rural communities, where Head Start fills a critical supply gap.⁴³ Rather than increasing flexibility, removing duration requirements amidst constrained program funding will likely prompt grantees to reduce operating hours, ultimately diminishing enrollment and restricting access for the families who need it most.

Impacts on health and safety standards.

The proposed rule eliminates critical health, safety, and quality measures, including Head Start-specific requirements for annual staff training on preventing abuse and neglect, and certain requirements for child supervision.⁴⁴ Programs would instead be governed by state licensing and child-protection laws, which vary from state to state, with programs still required to report child health and safety incidents to the Office of Head Start within 7 calendar days. Under the proposal, Head Start programs are directed to comply with state child care licensing requirements for ratios and group size, regardless of whether a program is mandated to hold state licensure. Findings from the Children's Equity Project indicate that this policy shift would lead to expanded class sizes—thereby reducing individualized instruction—for 80 percent of children served by Head Start and Early Head Start.⁴⁵ HHS's own analysis acknowledges that the added flexibility for programs not subject to state licensing "could introduce some risk" to children's health and safety.⁴⁶

Since the early 1990s, Head Start has required one teacher for every four infants and toddlers, eight three-year-olds, or ten four-year-olds.⁴⁷ Currently, only one-quarter of states' licensing requirements align with existing Head Start standards related to the infant and toddler ratio requirements of 1:4; fewer than 10 percent align on ratio requirements for 2-year-olds, and just 3 states (6 percent) align on standards for three-year-olds.⁴⁸ If implemented, the proposed regulation would cause ratio requirements for toddlers per educator under state licensing to more than double across nine states: Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, Nevada, North Carolina, and Texas.⁴⁹ Fewer than half of states (19) align with Head Start ratio requirements for 4-year-olds.⁵⁰ Fewer than three-quarters align on requirements for

⁴² Child Care Aware of America, "Child Care in AMerica: 2025 Price and Supply" May 2026, available at <https://info.childcareaware.org/price-and-supply-2025>

⁴³ Casey Peeks, "Project 2025 Would Eliminate Head Start, Severely Restricting Access to Child Care in Rural America."

⁴⁴ Federal Register, "Reducing Federal Burden for Head Start Programs."

⁴⁵ Shantal Meek and others, "Lowering The Bar: An Analysis Of How Replacing Head Start Standards With State Child Care Licensing Weakens Early Learning Across The United States."

⁴⁶ Federal Register, "Reducing Federal Burden for Head Start Programs."

⁴⁷ Aaron Loewenberg, "What's in the Trump Administration's New Head Start Rule?" New America, August 6, 2026, available at

<https://www.newamerica.org/insights/whats-in-the-trump-administrations-new-head-start-rule/>

⁴⁸ Morgan Healy and Steve Barnett, "The Race To The Bottom: What Replacing Head Start Ratios Standards With State Child Care Minimums Will Mean For Children In Poverty," NIEER, available at https://nieer.org/sites/default/files/2026-08/what_replacing_head_start_ratios_standards_with_state_child_care_minimums_will_mean_for_children_in_poverty.pdf

⁴⁹ Ibid.

⁵⁰ Ibid.

infants younger than one year.⁵¹ Allowing ratios to increase in accordance with more lax state standards is not a programmatic efficiency measure – it is rationing teachers’ attention and care for the vulnerable children who qualify for Head Start.

Evidence suggests that increasing child-staff ratios in care may “endanger young children’s health and safety, limit young children’s development and learning outcomes, lead to further child care worker shortages by increasing teacher stress and turnover, and demand a level of workforce training not currently present in the field.”⁵² Those consequences are perhaps most profound for infants and toddlers, who rely on responsive, nurturing care in smaller groups to support their language and socioemotional development.⁵³ With smaller ratios, teachers can give children more individualized attention, monitor their wellbeing and progress, and connect with their families more meaningfully. Previous research also found that with marginally smaller ratios (1:15 compared to 1:20), preschool students received more one-on-one instruction and consequently, higher literacy gains.⁵⁴ In another large-scale federal study, three-year-olds attending child care programs that met structural standards for quality, including limited group sizes and ratios, more positive language stimulation, and greater interaction between the child and the provider, saw more advanced cognitive and social development than those attending lower-quality programs.⁵⁵ Removing these requirements and allowing Head Start programs to revert to the baseline requirements imposed by states, will leave children in some parts of the country more vulnerable to harm than others, while removing a benchmark standard of the Head Start program that has supported its effectiveness.

Children learn best when they are healthy and well: when they have regular well-child screenings, adequate health services, and are supported in meeting their developmental milestones.⁵⁶ Small ratios help teachers establish supportive relationships with the families they serve such that they can help connect them with services and closely monitor their children’s progress. Head Start programs stand out in their focus on whole-child development, including with its priorities around physical, mental, and dental health.⁵⁷ At a time when drastic cuts to Medicaid and the Supplemental Nutrition Assistance Program are pushing millions of children

⁵¹ Ibid.

⁵² Walter Gilliam, “Four Evidence-Based Reasons Why Increasing Child Care Ratios Would be Dangerous and Counterproductive,” Buffett Early Childhood Institute, March 2025, available at https://buffettinstitute.nebraska.edu/resources/child-care-ratios-brief_digital.pdf

⁵³ Center for Law and Social Policy, “Improve Center Ratios and Group Sizes,” available at <https://www.clasp.org/improve-center-ratios-and-group-sizes/>

⁵⁴ Morgan Healy and Steve Barnett, “The Race To The Bottom: What Replacing Head Start Ratios Standards With State Child Care Minimums Will Mean For Children In Poverty.”

⁵⁵ Robin Peth-Pierce, “The NICHD Study of Early Child Care,” April 1998, available at <https://files.eric.ed.gov/fulltext/ED427882.pdf>

⁵⁶ Head Start, School Readiness, “Healthy Children Are Ready to Learn,” available at <https://headstart.gov/school-readiness/article/healthy-children-are-ready-learn>

⁵⁷ Shantal Meek and others, “Lowering The Bar: An Analysis Of How Replacing Head Start Standards With State Child Care Licensing Weakens Early Learning Across The United States.”

off of health coverage⁵⁸ and food assistance⁵⁹ and harming their health,⁶⁰ these services are even more essential.

Head Start serves as a vital partner in promoting children's routine health assessments, ensuring they have access to essential care, and ensuring they hit key developmental milestones through preventive medical and dental visits, improved nutrition, and supports for their socio-emotional wellbeing.⁶¹ Indeed, health and mental health supports are a core pillar of the holistic care model that Head Start delivers to prepare children for school.

⁶²

Eliminating federal standards for health severely threatens the integrity of this comprehensive care framework and creates substantial variability in program execution. Specifically, without these standards, children are far more likely to miss timely, medically recommended well-child checkups and preventive care routines. Such rollbacks also delay critical health and developmental screenings,⁶³ postponing early detection, treatment, and ongoing care for emergent conditions. Additionally, diminishing these standards threatens to exacerbate health disparities⁶⁴ and elevate broader public health threats related to childhood illnesses, partly by postponing routine immunizations⁶⁵ and foregoing preventive well-child appointments. Early learning and healthy development depend directly on physical well-being and consistent healthcare access. Head Start's whole-child approach rests on the principle that children succeed when their overall health needs are met alongside their educational needs. Compromising established health and safety protocols—including health service mandates and class ratio limits—endangers children's educational success by leaving medical concerns unresolved and compromising child safety.

⁵⁸ Joan Alker, "Two Million Fewer Children are Enrolled in Medicaid Since Trump Took Office," Georgetown Center for Children and Families, May 28, 2026, available at <https://ccf.georgetown.edu/2026/05/28/two-million-fewer-children-are-enrolled-in-medicaid-since-trump-took-office/>

⁵⁹ Joseph Llobrera, "Number of Children Receiving SNAP Continues to Drop Under Harmful 2025 Republican Reconciliation Law," Center on Budget and Policy Priorities, July 21, 2026, available at <https://www.cbpp.org/blog/number-of-children-receiving-snap-continues-to-drop-under-harmful-2025-republican>

⁶⁰ Carlie Myers and Andrew Beck, "H.R.1's Medicaid Cuts Threaten Children's Health," HealthAffairs, January 202, 2026, available at <https://www.healthaffairs.org/content/forefront/h-r-1-s-medicaid-cuts-threaten-children-s-health>

⁶¹ Centers for Disease Control and Prevention, "CDC's Developmental Milestones," available at <https://www.cdc.gov/act-early/milestones/index.html>

⁶² Hailey Gibbs, "Head Start is a Model for Supporting Child and Family Mental Health" (Washington, Center for American Progress: 2025), available at <https://www.americanprogress.org/article/head-start-is-a-model-for-supporting-child-and-family-mental-health/>

⁶³ Centers for Disease Control and Prevention, "Developmental Monitoring and Screening," available at <https://www.cdc.gov/act-early/about/developmental-monitoring-and-screening.html>

⁶⁴ Shantal Meek and others, "Lowering The Bar: An Analysis Of How Replacing Head Start Standards With State Child Care Licensing Weakens Early Learning Across The United States."

⁶⁵ American Academy of Pediatrics, "Recommended Child and Adolescent Immunization Schedule for Ages 18 Years or Younger," available at <https://downloads.aap.org/AAP/PDF/AAP-Immunization-Schedule.pdf>

Impacts of limiting parental involvement in Head Start.

Head Start is fundamentally built upon a model of shared governance. Under existing regulations, every program must engage parents and families by establishing a committee consisting exclusively of parents of currently enrolled children.⁶⁶ This committee is tasked with advising staff on local policies, activities, and services to ensure they align with families' and communities' needs. The parent committee provides structured opportunities for parents to guide programming and collaborate with the Head Start policy council, which oversees overall program functions. To ensure this involvement is meaningful and sustainable, parent committee members receive targeted training, a dedicated budget, and access to formal impasse procedures. This involvement is an essential component of the Head Start model, and one that ensures that parents are engaged in their children's learning and development, can establish strong relationships with Head Start teachers and staff, and can ensure that their children receive the services they need to thrive. Removing standards related to parent committees risks reducing parent involvement in Head Start program governance, thereby limiting the choices they have structurally been able to exercise over their children's care and learning.

Furthermore, the performance standards require programs to embed family engagement strategies across all operational systems to bolster family well-being and foster early learning.⁶⁷ Programs are mandated to provide research-based parenting curricula alongside activities that strengthen parent-child interactions and advance language, dual-language, and literacy development.⁶⁸ This is part of the whole-family model that has made Head Start a documented successful program. To help families achieve self-sufficiency, programs deliver individualized family partnership services that identify and address specific household goals.⁶⁹ Additionally, programs must offer comprehensive educational and support services covering physical, oral, nutritional, and mental health—including guidance on safe sleep, environmental hazards, physical activity, and vehicle safety—while assisting parents in navigating health and mental health systems for which they might not otherwise have resources.

These standards are backed by decades of developmental research. Early interactions—often described as "serve and return" relationships—form the foundational architecture of the developing brain and shape long-term health and academic success.⁷⁰ Multiple meta-analyses demonstrate that interventions supporting these early relationships produce significant, lasting

⁶⁶ Head Start Program Performance Standards, "1302.34 Parent and family engagement in education and child development services," available at <https://headstart.gov/policy/45-cfr-chap-xiii/1302-34-parent-family-engagement-education-child-development-services>

⁶⁷ Head Start Program Performance Standards, "1302.50 Family Engagement," available at <https://headstart.gov/policy/45-cfr-chap-xiii/1302-50-family-engagement>

⁶⁸ Head Start Program Performance Standards, "1302.51 Parent Activities To Promote Child Learning And Development," available at <https://headstart.gov/policy/45-cfr-chap-xiii/1302-51-parent-activities-promote-child-learning-development>

⁶⁹ Head Start Program Performance Standards, "1302.52 Family Partnership Services," available at <https://headstart.gov/policy/45-cfr-chap-xiii/1302-52-family-partnership-services>

⁷⁰ Harvard Center on the Developing Child, "Serve and Return," available at <https://developingchild.harvard.edu/key-concept/serve-and-return/>

benefits for children's learning and development.⁷¹ Indeed, studies confirm that active parent participation in Head Start programming correlates directly with enhanced home learning environments and improved cognitive and behavioral outcomes for children.⁷² Research also shows that greater parental involvement in Head Start is associated with stronger gains in children's literacy, language, and social competence,⁷³ with stronger long-term outcomes than education alone.⁷⁴

Impacts of removing protections against harsh disciplinary practices.

Protections against the suspension and expulsion of young children were added to the Head Start Program Performance Standards (HSPPS)⁷⁵ in 2016 to directly address documented racial disparities in early childhood disciplinary actions. Key empirical findings underscore the severity of these disparities:

- **Expulsion Rates in Early Education:** Initial research revealed that preschoolers were expelled at nearly three times the rate of K–12 students, with Black children twice as likely and boys four times as likely to be expelled compared to their peers.⁷⁶
- **Racial Disparities:** According to data from the 2021–2022 school year, Black children represented roughly 20 percent of total preschool enrollment but accounted for 38 percent of students receiving one or more suspensions and one-third of all expulsions.⁷⁷
- **Disabilities and Gender Overrepresentation:** Children with disabilities and boys remain significantly overrepresented among students subject to exclusionary discipline in early childhood settings. While children with disabilities made up one-quarter of enrollment, they accounted for three-quarters of expulsions and 41 percent of children who had been suspended one or more times in the 2021–2022 school year.⁷⁸ Boys, who made up half of enrollment, accounted for 81 percent of suspensions and 84 percent of expulsions that year.⁷⁹ It should also be noted that this is often a racial and disability intersection in data on early education expulsion and disciplinary practices.⁸⁰

⁷¹ Joshua Jeong and others, “Parenting Interventions To Promote Early Child Development In The First Three Years Of Life: A Global Systematic Review And Meta-Analysis,” *PLOS Medicine* (2021), available at <https://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1003602>

⁷² Arya Ansari and Elizabeth Gershoff, “Parent Involvement in Head Start and Children’s Development: Indirect Effects Through Parenting,” *Journal of Marriage and Families*, 13(2015): 562-579, available at <https://pmc.ncbi.nlm.nih.gov/articles/PMC4807601/>

⁷³ Julia Mendez, “How Can Parents Get Involved In Preschool? Barriers And Engagement In Education By Ethnic Minority Parents Of Children Attending Head Start,” *Cultural Diversity and Ethnic Minority Psychology*, 16(2010): 26-36, available at <https://pubmed.ncbi.nlm.nih.gov/20099962/>

⁷⁴ Hirokazu Yoshikawa and others, “Investing in Our Future: The Evidence base on Preschool Education” (Society for Research in Child Development, Foundation for Child Development: 2013), available at <https://www.fcd-us.org/wp-content/uploads/2016/04/Evidence-Base-on-Preschool-Education-FINAL.pdf>

⁷⁵ Head Start Program Performance Standards, “1302.17 Suspension and Expulsion,” available at <https://headstart.gov/policy/45-cfr-chap-xiii/1302-17-suspension-expulsion>

⁷⁶ Walter Gilliam, “Prekindergartners Left Behind: Expulsion Rates in State Prekindergarten Systems,” available at <https://www.fcd-us.org/wp-content/uploads/2016/04/ExpulsionCompleteReport.pdf>

⁷⁷ Shantal Meek and others, “Lowering The Bar: An Analysis Of How Replacing Head Start Standards With State Child Care Licensing Weakens Early Learning Across The United States.”

⁷⁸ Ibid.

⁷⁹ Ibid.

⁸⁰ National Association for the Education of Young Children, “A Changing Landscape for Exclusionary Policies in Early Childhood Education,” November 2025, available at

Historically, HSPPS strictly prohibited temporary or permanent removal of children from Head Start programs unless staff actively partnered with families to facilitate a smooth transition to an alternative program better equipped to address the child's needs. Furthermore, standards required infant and early childhood mental health consultation, an intervention empirically linked to reductions in exclusionary discipline.⁸¹

Under the proposed rule, Head Start programs would instead defer to state licensing requirements to establish individual discipline policies.⁸² In many states, these licensing frameworks offer no specific protections against pre-K expulsions.⁸³ A 2023 analysis of state exclusionary discipline policies found that only 13 states had some prohibition on exclusionary discipline codified in legislation, while another 7 had some kind of general statewide rule, and 12 had only program-specific requirements.⁸⁴ Importantly, though these efforts are aimed at reducing exclusionary discipline, they do not ultimately eliminate suspension and expulsion. Rescinding uniform federal standards diminishes the quality, range, and scope of services intended to shield children from exclusionary practices while undermining support for healthy social, emotional, and behavioral development.

Expulsion and suspension are generally not associated with reducing challenging behavior, but they are associated with a greater likelihood of being expelled or suspended later in their schooling years, dropping out of school, holding negative attitudes toward schooling, and facing grade retention or even incarceration later in life.⁸⁵ Additionally, research shows that exposure to adverse childhood experiences (ACEs) elevates the risk of a child being subjected to suspension or expulsion.⁸⁶ Because poverty is one of the primary ACEs as well as a core criterion for Head Start eligibility, maintaining consistent, nationwide regulations that prohibit exclusionary discipline in Head Start centers is essential.

Preserving explicit safeguards against exclusionary disciplinary actions is essential. Removing a child from Head Start leaves parents with extremely limited alternatives, as families qualifying for these services rarely have the financial means to pay the tuition associated with private care options. Furthermore, exclusionary discipline inflicts cumulative harm on a child's overall

https://www.naeyc.org/sites/default/files/wysiwyg/user-174467/2025_suspension_and_expulsion_brief_final.pdf

⁸¹ Walter Gilliam, "Prekindergartners Left Behind: Expulsion Rates in State Prekindergarten Systems."

⁸² Federal Register, "Reducing Federal Burden for Head Start Programs."

⁸³ Aaron Loewenberg, "What's in the Trump Administration's New Head Start Rule?"

⁸⁴ Allie Schneider and Hailey Gibbs, "Data Dashboard: An Overview of Child Care and Early Learning in the United States" (Washington, Center for American Progress: 2023), available at <https://www.americanprogress.org/article/data-dashboard-an-overview-of-child-care-and-early-learning-in-the-united-states/>

⁸⁵ Walter Gilliam, "Early Childhood Expulsions and Suspensions Undermine Our Nation's Most Promising Agent of Opportunity and Social Justice," Yale Child Study Center, available at <https://dropoutprevention.org/wp-content/uploads/2016/10/rwjf-early-childhood-expulsions-and-suspensions-UndermineOurNationsMostPromisingAgentofOpportunityandSocialJustice-2016.pdf>

⁸⁶ Songtian Zeng and others, "Adverse Childhood Experiences and Preschool Suspension Expulsion: A Population Study," *Child Abuse and Neglect*, 97 (2019), available at <https://www.sciencedirect.com/science/article/abs/pii/S0145213419303266?via%3Dihub>

well-being, growth, and learning outcomes. Fulfilling Head Start’s foundational mission—providing tailored support to young children with the greatest level of need—depends entirely on robust, enforceable standards that protect children from being removed from early learning environments essential to their ongoing development.

III. The proposed rule undercuts Head Start’s national commitment to support for young children that does not depend on where a child grows up

While the language of the proposed rule is framed as reducing administrative burdens and freeing up resources to serve more children, at its core, it undermines the principles that have governed Head Start throughout its history. Reducing more than 90 percent of the established standards does more than cut red tape—it contravenes the evidence-based practices that shape children’s learning environments, teacher-child interactions, and parental involvement critical to producing the established benefits Head Start is known for.⁸⁷ Losing codified standards of practice puts a greater burden on Head Start programs and the state administrators who would have to regulate and monitor them. This all but ensures that the experiences of Head Start families from one state to another will be drastically different, and, consequently, that the product of a Head Start education will depend on where a child and their family live.

Impacts on children in rural communities.

Head Start plays an especially vital role in rural communities, where Head Start fills essential gaps in the early education and child care supply. Therefore, the impacts of the proposed rule, including the reduced quality and destabilized program, will be felt especially by children living in rural areas. In remote rural parts of the country, 70 percent of young children have inadequate access to a licensed child care slot.⁸⁸ The Head Start Act requires that the “Secretary shall adopt appropriate administrative measures to assure that the benefits... will be distributed equitably between residents in rural and urban areas.”⁸⁹ But recent research shows that, as a result of insufficient funding, coupled with unique challenges scaling access to care in rural communities, Head Start access is not evenly distributed.

In rural areas, nearly half⁹⁰ of young children who qualify by income⁹¹ have no access to a Head Start slot, compared with just greater than 20 percent of qualifying young children in urban areas. And while nearly 80 percent of qualifying children in urban areas have some access to a

⁸⁷ Chloe Gibbs, “Moving Beyond “Does Head Start Work?” What 60 Years of Research Have to Say,” W.E. Upjohn Institute for Employment Research, March 13, 2026, available at <https://www.upjohn.org/research-highlights/moving-beyond-does-head-start-work-what-60-years-research-have-say>

⁸⁸ Hailey Gibbs and Casey Peeks, “America’s Licensed Child Care Deserts” (Washington, Center for American Progress: 2026), available at <https://www.americanprogress.org/article/americas-licensed-child-care-deserts/>

⁸⁹ Head Start Act, “Sec. 640 Allotment of Funds Limitations on Assistance,” available at <https://headstart.gov/policy/sec-640-allotment-funds-limitations-assistance>

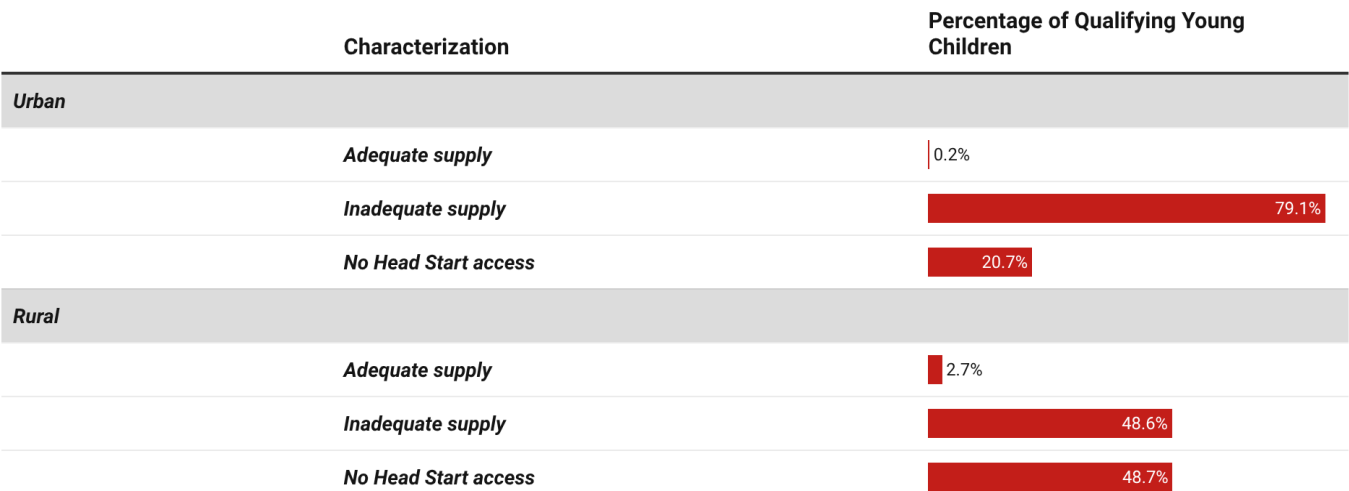
⁹⁰ Hailey Gibbs and Casey Peeks, “America’s Licensed Child Care Deserts.”

⁹¹ Office of the Assistant Secretary for Planning and Evaluation, “Poverty Guidelines for 2026,” available at <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Head Start slot, however minimal, less than half of rural children do.⁹² Nevertheless, Head Start remains a critical resource for rural families: In some places, Head Start is the only licensed program available, and large shares of public pre-K classrooms collaborate with community partners, including Head Start. Funded Head Start slots are also overrepresented in rural communities at 45.9 percent, compared to 31.6 percent in suburban areas and 22.4 percent in urban areas.⁹³

Roughly 20 Percent of Qualifying Young Children In Urban Areas Have No Head Start Access Compared to Nearly Half in Rural Communities

Lack of Head Start access is heavily concentrated in rural communities despite the critical gap in child care infrastructure that Head Start fills for rural families



Notes: Eligibility for Head Start determined solely by poverty status. These estimates do not include children who may qualify by some other means, including whether they are experiencing homelessness, in foster care, or participate in some other program which would grant categorical eligibility, such as SSI, SNAP, or TANF, and may therefore be an undercount of the total number of eligible children.

Source: Rurality derived from analyses based on the NCHS classification scheme; Author’s analysis of child care deserts data, using federal poverty level to isolate children under the age of 6 who qualify for Head Start services, on file with authors. • Created with Datawrapper

With cuts to comprehensive services, personnel, and increased burden on programs to establish teaching and learning practices in accordance with their respective state laws, reductions in program duration and operating hours, and increased administrative oversight, rural programs will be particularly hard-hit, with a high likelihood of classroom and program closures. Across the country, the potential loss of Head Start programs could result in thousands of additional children without access to child care,⁹⁴ alongside the ripple effects their closures could have for working parents who could consequently face the need to miss work, reduce hours, or leave the workforce altogether.⁹⁵

⁹² Hailey Gibbs and Casey Peeks, “America’s Licensed Child Care Deserts.”

⁹³ Casey Peeks and Allie Schneider, “5 Things to Know About Head Start.

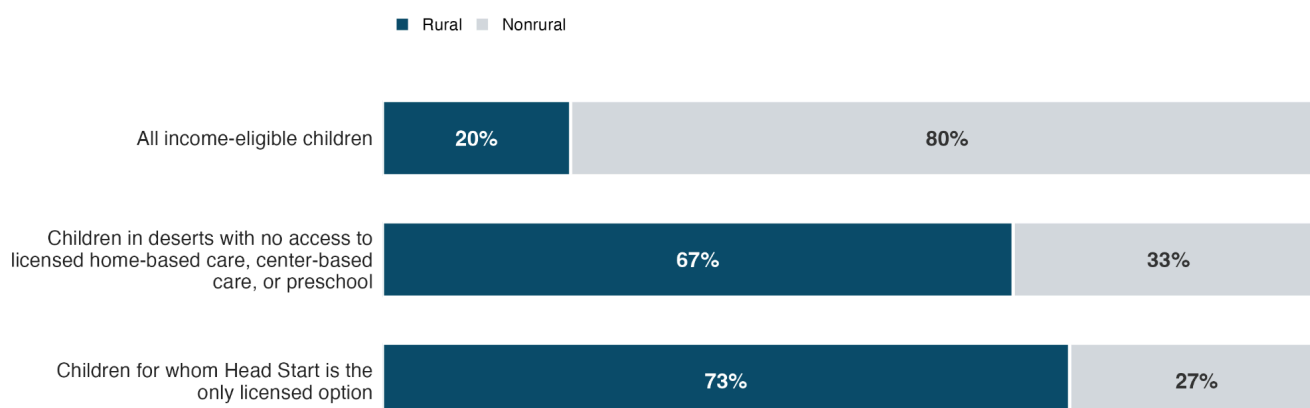
⁹⁴ Child Care Trust, Child Care Gap “Role of Head Start,” available at <https://childcaregap.org/headstart>

⁹⁵ Alyssa Burr, “Here’s What the Trump Administration’s Head Start Overhaul Means for Families,” Pennsylvania Independent, September 17, 2026, available at <https://pennsylvaniaindependent.com/education/heres-what-the-trump-administrations-head-start-overhaul-means-for-families/>

Even with limited overall access to Head Start, rural areas depend on the program to a disproportionate degree because alternative licensed care options remain severely scarce. Initial findings indicate that Head Start's function as an essential lifeline in areas completely lacking other licensed child care is heavily concentrated in rural regions rather than spread uniformly across the country.⁹⁶ Nationwide, 22.4 percent of income-eligible children in rural communities reside in child care deserts without any access to licensed preschool, center-based, or home-based slots. By contrast, only 2.7 percent of income-eligible nonrural children face this total absence of these options—a more than 8-fold gap. Conversely, among income-eligible children living in deserts across all other licensed care categories (preschool, home-based, and center-based options), 5.9 percent of the rural population retains access to some Head Start supply, compared to 4.5 percent of the nonrural population—a gap of roughly 1.3 times.

Rural children are 20 percent of income-eligible children but most of those with no other licensed child care option

Rural and nonrural shares of income-eligible children under age 5, by group



Note: Estimates, rounded to the nearest percent. Licensed child care deserts are areas with at least three young children per licensed slot. Access reflects the proximity of licensed supply, not enrollment. Nonrural includes urban and suburban areas. Income eligibility uses census tract poverty rates for children under 5. Source: Center for American Progress analysis of licensed child care deserts data (2025) and American Community Survey 2019–2023 five-year estimates.

An estimated 20 percent of income-eligible children under age 5 nationwide live in rural areas, while the remaining 80 percent are children in suburban and urban areas. Children in rural areas also make up nearly two-thirds (67 percent) of income-eligible children living in deserts with no access to licensed home-based care, center-based care, or preschool. Yet rural children are disproportionately represented among children for whom Head Start is the only licensed child care option nearby: They account for 73 percent of these children, compared to 27 percent of nonrural children.⁹⁷

⁹⁶ Data and analyses on file with author.

⁹⁷ Ibid.

Head Start Reliance is Overwhelmingly a Rural Phenomenon

The percentage of poverty-eligible children with access to Head Start but no access to other forms of licensed care, by rurality, with a percentage point gap between urban and rural communities.

State	Nonrural %	Rural %	Gap (pts.)
Arizona	0.19%	6.25%	6.06
California	0.31%	4.86%	4.55
South Dakota	0.06%	3.96%	3.90
Washington	0.20%	3.83%	3.63
Indiana	0.15%	3.21%	3.06
Michigan	0.05%	2.90%	2.85
Mississippi	0.10%	2.64%	2.54
Virginia	0.12%	2.65%	2.53
Pennsylvania	0.36%	2.50%	2.14
West Virginia	0.88%	2.58%	1.69

Based on preliminary data from the Center for American Progress' study on Licensed Child Care Deserts. Data on file with author. Featured states are the ten with the highest urban-rural gap among families with Head Start access but no access to other licensed care. A population threshold of 7,500 was established to ensure that estimates are reliable

Created with [Datawrapper](#)

Reliance on Head Start as a sole provider of licensed care is overwhelmingly concentrated in rural areas, with distinct disparities observed across individual states. Low-income children in rural communities depend on Head Start as their only licensed child care option at nearly 11 times the rate of nonrural children. Across several states, a prominent divergence between rural and non-rural rates highlights that exclusive reliance on Head Start remains a distinctly rural issue. The states leading in the percentage gap between rural, poverty-eligible children relying exclusively on Head Start supply include Arizona, California, Indiana, South Dakota, and West Virginia.

New research from the First Five Years Fund finds that in 5 states—Alaska, Louisiana, Mississippi, Oregon, and West Virginia—Head Start slots made up more than one-fifth of rural child care capacity.⁹⁸ Head Start is also an essential job provider, particularly in rural areas; Head Start employs almost 250,000 staff at tens of thousands of locations across the country.⁹⁹ For the vulnerable children and families who qualify for Head Start services, any potential loss of access is devastating. One rural Head Start program director noted: *"[The loss of Head Start] would decimate the lives of people immediately... I don't think people understand what will happen to these families, and the staff who work here. We are one of the biggest job providers. The domino effects of not having Head Start here would be immediate: Children would*

⁹⁸ First Five Years Fund, "FFYF 2026 Head Start State Fact Sheets," September 14, 2026, available at <https://www.ffyf.org/2026/09/14/head-start-fact-sheets/>

⁹⁹ Ibid.

immediately go hungry, families would not be able to work because there aren't other resources. We are the resources."¹⁰⁰

Impacts on children experiencing homelessness.

Families experiencing homelessness may fluctuate between living in hotels, cars, and shelters, with limited access to the kinds of administrative documents necessary to regularly prove eligibility.¹⁰¹ Head Start families qualify for the program automatically if they are experiencing homelessness. Under existing program performance standards, self-attestation is a critical tool for families to begin accessing services until such time as they can produce documents that establish, for example, a child's age or the family's income.

Rescinding the program performance standards dedicated to serving children experiencing homelessness will create significant new obstacles for these vulnerable children. The existing program performance standards provide a framework by which programs can implement those statutory mandates. The standards require agencies to maintain enrollment for children in foster care or those experiencing homelessness, even if they relocate outside the service area, while also facilitating smooth transitions to Head Start programs in new communities. Research shows that for children in foster care, participation in Head Start has positive effects on cognitive, social-emotional and health outcomes.¹⁰² Access to Head Start is associated with lower household instability and also reduces the association between household instability and higher acting-out behaviors among young children.

The proposed eligibility framework imposes administrative paperwork burdens that disproportionately affect unhoused families. Combined with the elimination of provisions allowing programs to reserve a small percentage of slots specifically for children in foster care or those experiencing homelessness, these policies heighten the risk of excluding the very populations Head Start is mandated by law, per the Head Start Act, to prioritize.¹⁰³ Furthermore, by requiring programs to report staff to HHS for eligibility determination infractions, the proposed rule fosters a compliance-driven workplace culture where staff are compelled to focus on administrative enforcement rather than supporting families seeking vital services.

The statutory mandates of the Head Start Act direct Head Start agencies to "meet the needs of homeless children, including transportation needs, and the needs of children in foster care." To fulfill these requirements, the Head Start Act obligates the Secretary to establish procedures and policies that eliminate obstacles to enrollment and active involvement for unhoused

¹⁰⁰ Hailey Gibbs, "'We Are the Resources': Head Start Is a Crucial Early Learning and Community Program for Families Nationwide," Center for American Progress, August 5, 2025, available at <https://www.americanprogress.org/article/we-are-the-resources-head-start-is-a-crucial-early-learning-and-community-program-for-families-nationwide/>

¹⁰¹ Bryce Covert, "Head Start Rule Changes Would Slash Enrollment of Homeless Children," The Nation, August 27, 2026, available at <https://www.thenation.com/article/society/head-start-homeless-children/>

¹⁰² Kyunghye Lee, "Long-Term Head Start Impact On Developmental Outcomes For Children In Foster Care," *Child Abuse and Neglect*, 101(2020), available at <https://www.sciencedirect.com/science/article/abs/pii/S0145213419305058>

¹⁰³ Legal Information Institute, Cornell Law School, "42 U.S. Code § 9836 - Designation of Head Start Agencies," available at <https://www.law.cornell.edu/uscode/text/42/9836>

children. The Head Start Program Performance Standards (HSPPS) put these legislative mandates into action. Specifically, under these standards, once a child in foster care or a child experiencing homelessness is enrolled, the agency must actively work to sustain that enrollment even if the family or child relocates to a new service area, alongside providing transitional support if they move to a Head Start program in another area. Empirical research indicates that participation in Head Start yields specific, beneficial health, cognitive, and social-emotional outcomes for children in foster care.¹⁰⁴ Furthermore, Head Start enrollment is linked to reduced household instability and mitigates the relationship between instability at home and increased behavioral issues among young children.

IV. The proposed rule would deeply destabilize both Head Start programs and the communities they serve by excluding large numbers of children from the program and limiting access to necessary services.

The proposed rule undercuts the congressional mandate that programs meet the needs of their communities, with the express goals of reducing costs associated with compensation and service delivery. This will undoubtedly yield the exclusion of a large share of eligible families and shrink the scale and quality of services Head Start is designed to provide.

Impacts on children with disabilities.

Comprehensive services that support the total development, health, and family well-being of enrolled children are required by the Head Start Act and are a core defining element of the program.¹⁰⁵ Timely identification of delays or disabilities is vital to connecting young children with intervention services that can support them to reach developmental milestones and prepare for success in school.¹⁰⁶ Head Start's 45-day screening window ensures fast connection between families and critical support and intervention services—particularly essential for the families that qualify for Head Start who might otherwise lack other touchpoints with health professionals to assess their children. For many low-income households, Head Start may serve as the only reliable access point for vision, dental, and mental health referrals, alongside these critical developmental screenings.¹⁰⁷ Head Start's positive impact on disabled children is well-documented¹⁰⁸—a crucial factor as schools report growing numbers of students requiring

¹⁰⁴ Kyunghye Lee, “Long-Term Head Start Impact On Developmental Outcomes For Children In Foster Care.”

¹⁰⁵ First Five Years Fund, “Head Start Snapshot: Comprehensive Services,” August 6, 2026, available at <https://www.ffyf.org/2026/08/06/head-start-comprehensive-services/>

¹⁰⁶ Shantal Meek and others, “Lowering The Bar: An Analysis Of How Replacing Head Start Standards With State Child Care Licensing Weakens Early Learning Across The United States.”

¹⁰⁷ First Five Years Fund, “Head Start Snapshot: Comprehensive Services.”

¹⁰⁸ Shantal Meek and others, “Head Start's Footprint: A Focus on Rural Communities, Children with Disabilities, and Vital Health Services,” Children's Equity Project, May 2025, available at <https://cep.asu.edu/sites/g/files/litvpz916/files/2025-05/Head%20Start%E2%80%99s%20Footprint%20A%20Focus%20on%20Rural%20Communities%2C%20Children%20with%20Disabilities%20and%20Vital%20Health%20Services%20%2810%29.pdf>

additional support;¹⁰⁹ the inclusion of children with disabilities in the program predates even the Individuals with Disabilities Act.¹¹⁰

The proposed rule replaces specific regulations governing health, mental health, and family support services with minimal standards. Under these changes, children with suspected or confirmed developmental delays who do not qualify for IDEA-funded services risk losing necessary interventions, and staff would lack specialized training to support them. Moreover, the proposed rule would remove the requirement for monthly mental health consultations and would eliminate the 40:1 caseload cap for family service workers, returning to pre-2024 regulations that leave these staffing ratios to local discretion, increasing the burden on these workers to provide high-quality comprehensive services. The proposed rule would also rescind language related to providing developmental screenings and services in the child's language, including using qualified bilingual staff or interpreters, risking the accuracy of any screenings performed in a language the child does not understand.

Notably, not all states have requirements that licensed child care centers provide care for children with disabilities, with only 5 explicitly requiring access.¹¹¹ And, as noted previously, without a prohibition against suspension and expulsion, disabled children, particularly if they have not been identified by early screening, face the possibility of removal from the Head Start classroom as a result of perceived self-regulatory or behavioral challenges. This risks undermining the statutory mandate requiring Head Start programs to address community-specific needs, instead prioritizing reductions in service delivery and compensation costs.

Impacts on children in immigrant families and dual-language learners.

Children from immigrant families, or who do not speak English, often struggle to integrate into a new education system, largely because of challenges among parents to participate in their children's learning and care, experiences of discrimination, and a lack of positive intercultural experiences.¹¹² Head Start has historically offered an inclusive approach, both to family engagement via its multigenerational services, parent councils, and directed outreach by teachers and staff, and in its multicultural and multilingual education programming and assessment tools.¹¹³ Across the nation, dual-language learners (DLLs) comprise one-third of all

¹⁰⁹ New Mexico State Global Campus, "How Special Education Is Changing: Key Trends Shaping Classrooms Today," January 27, 2026, available at <https://global.nmsu.edu/blog/education/emerging-trends-in-special-education/>

¹¹⁰ Shantal Meek and others, "Lowering The Bar: An Analysis Of How Replacing Head Start Standards With State Child Care Licensing Weakens Early Learning Across The United States."

¹¹¹ Ibid.

¹¹² Carla Estefanía Valdés and Alejandra Falabella, "Being The Outsider: A Systematic Review Of The Links Between Migrant Families And Early Childhood Education And Care Centres," *Contemporary Issues in Early Childhood* (2025), available at <https://journals.sagepub.com/doi/abs/10.1177/14639491251392691>

¹¹³ Head Start Program Performance Standards, "1302.50 Family Engagement."

children under 5, representing an even greater share of enrollment in Head Start (36 percent) and Early Head Start (40 percent).¹¹⁴

Nationwide, approximately 34 to 35 percent of children enrolled in Head Start programs are dual language learners (DLLs)

Number of Dual Language Children and Staff Enrolled in Head Start During the 2024-2025 School Year

Fiscal Year (FY) 2025 Program Information Report	Total Number
Dual Language Learners (enrolled child count)	288,875
The number of staff who are proficient in a language(s) other than English	36,363

Data are derived from the Head Start Program Information Report (National Level Summary) for Fiscal Year 2025; Estimated percentage of DLLs nationwide are derived from Head Start Program Facts for Fiscal Year 2024.

Source: Head Start Program Facts: Fiscal Year 2024 • Created with Datawrapper

Removing bilingual support structures and imposing an English-only instructional mandate, as directed by the proposed rule, would undermine Head Start's efficacy for a demographic with which it has historically achieved remarkable success,¹¹⁵ particularly when compared to other early education programs where teachers may only be proficient in one language.¹¹⁶ In fact, in studies of elementary-aged English proficiency, a bilingual, rather than monolingual, early education was associated with faster English acquisition and better school performance in 5th grade.¹¹⁷

Moreover, farmworkers power 42 percent of the national agricultural economy, yet families who migrate for this work,¹¹⁸ often from countries where English is not spoken, face distinct challenges in securing care for their children. In recognition of these unique needs, Congress

¹¹⁴ Alexandra Figueras-Daniel and Christina Stephens, "An English-Only Mandate for Head Start Will Harm Children," NIEER, August 20, 2026, available at

<https://nieer.org/research-library/english-only-mandate-head-start-will-harm-children>

¹¹⁵ Anyla Jacome, Doré LaForett, and Julia Mendez, "Unlocking the Potential of the Dual Language Learners Program Assessment (DLLPA) to Support Head Start's Children and Families," Child Trends, October 29, 2025, available at

<https://www.childtrends.org/publications/unlocking-the-potential-of-the-dual-language-learners-program-as-sessment-dllpa-to-support-head-starts-children-and-families>

¹¹⁶ LENA, "Dual Language Learners Experience Less Teacher-Child Interaction in Child Care and Preschool: New Data Analysis," April 26, 2024, available at

<https://www.lena.org/resources/blog-posts/dual-language-learners-in-child-care/>

¹¹⁷ Ellen Serafini, Nadine Rozell, and Adam Winsler, "Academic and English Language Outcomes for DLLs as a Function of School Bilingual Education Model: The Role of Two-Way Immersion and Home Language Support, *International Journal of Bilingual Education and Bilingualism*, 25(2022), available at <https://www.tandfonline.com/doi/full/10.1080/13670050.2019.1707477>

¹¹⁸ USA Economic Research Service, "Farm Labor," available at <https://www.ers.usda.gov/topics/farm-economy/farm-labor>

created Migrant or Seasonal Head Start (MSHS).¹¹⁹ Supported by the HSPPS, MSHS delivers tailored services for farmworker families—including operating full-day care during peak harvest seasons, conducting home visits to strengthen family engagement in learning, and facilitating smooth transitions between locations as families move.¹²⁰ The proposed rule severely threatens MSHS's capacity to serve these diverse populations and undermines Congress's mandate. Furthermore, the proposal directly conflicts with recent federal court rulings that enjoin HHS from restricting eligibility based on immigration status and bar restrictions on diversity, equity, and inclusion initiatives that ensure culturally responsive care.¹²¹

The proposed rule threatens to exclude numerous children raised by foreign-born parents by mandating that all teaching must be performed in English,¹²² with the narrow exception for programs operated by Native American tribes. Moreover, the rule stipulates that if a child's native language is not English, programs must prioritize teaching them in English anyway, a method which risks undermining children's overall language development and performance in later school settings.¹²³ Over one-fifth of children under five years old have at least one noncitizen parent, though the vast majority of these children are U.S. citizens,¹²⁴ and Head Start eligibility is not and has never been conditioned on citizenship status.¹²⁵ Despite their eligibility, these children risk being excluded from critical early opportunities for school readiness because their immigrant families are either directly barred or deterred by fear. Furthermore, imposing an English-only requirement impairs English language acquisition for dual language learners, compromises their overall academic success,¹²⁶ and prevents parents from establishing the strong family partnerships essential to children's learning and well-being.¹²⁷

¹¹⁹ See Migrant or Seasonal Head Start, available at

<https://headstart.gov/definition/migrant-or-seasonal-head-start>

¹²⁰ National AgFamilies Head Start Association, "Migrant and Seasonal Head Start Programs," available at <https://nafhsa.org/migrant-and-seasonal-head-start-programs/>

¹²¹ Nonnie Shivers, Cameron Ellis, and Zachary Zaggar, "Federal Court Vacates DEI Conditions Compliance Certification Connected to HHS, HUD Grants," Ogletree Deakins, August 25, 2026, available at <https://ogletree.com/insights-resources/blog-posts/federal-court-vacates-dei-conditions-compliance-certification-connected-to-hhs-hud-grants/>

¹²² Federal Register, "Reducing Federal Burden for Head Start Programs."

¹²³ Trina Spencer and others, "Additive Effect, Feasibility, and Cost-Effectiveness of Family Engagement Activities that Supplement Dual Language Preschool Instruction," *Early Childhood Education Journal*, 53 (2025): 175-193, available at <https://link.springer.com/article/10.1007/s10643-023-01571-y>

¹²⁴ Randy Capps and others, "The Health and Well-Being of Young Children of Immigrants" (Washington, Urban Institute: 2004), available at <https://www.urban.org/sites/default/files/publication/51501/311139-The-Health-and-Well-Being-of-Young-Children-of-Immigrants.PDF>

¹²⁵ Hailey Gibbs and Rosa Barrientos-Ferrer, "CAP Comments on HHS' Notice Affecting Head Start Eligibility Criteria," Center for American Progress, August 14, 2025, available at <https://www.americanprogress.org/article/cap-comments-on-hhs-notice-affecting-head-start-eligibility-criteria/>

¹²⁶ Jackie Mader, "English-Only Proposal For Head Start Would Set Kids Back, Say Parents And Program Leaders," Hechinger Report, September 3, 2026, available at <https://hechingerreport.org/english-only-head-start/>

¹²⁷ Christine Meng, "The Availability of Head Start Services to Dual Language Learners and Their Families," *Research to Practice Summary* (2019), available at <https://journals.charlotte.edu/dialog/article/view/817/790>

Impacts on children from Black and Brown communities.

Head Start was originally founded in 1965, rooted in the momentum of the Civil Rights Movement and as part of the War on Poverty, in order to mitigate the socioeconomic differences observed in young children's school readiness.¹²⁸ It is a profound and well-documented reality that Black and Brown children, to this day, face significant barriers to school readiness founded on racial biases, opportunity gaps, and higher rates of socioeconomic and health disparities that can persist throughout development.¹²⁹

For Black and brown children—who frequently navigate implicit bias and racial stereotyping, and for whom culturally representative learning environments are essential—the proposed rule jeopardizes proven benefits to academic achievement and overall well-being. Access to high-quality early childhood education enhances outcomes for all students, but with particularly strong benefits in narrowing educational achievement gaps along racial lines for Black and Hispanic children.¹³⁰ Evidence demonstrates that enrollment in Head Start fosters long-term social, emotional, and behavioral growth that extends into adulthood, yielding positive effects on self-esteem, self-control, and supportive parenting practices across all demographics, and most notably among Black adults.

From changes to parent engagement, to the removal of protections against suspension and expulsion, to the reduction in preventive care services and the expectation that programs reduce their personnel costs associated with home visiting and family supports, the proposed rule poses considerable risks to the Black and Brown families who rely on Head Start services. Undermining the high-quality education and wraparound services at the core of the Head Start model compromises the unique benefits for this population of children and their families.¹³¹

Conclusion

Head Start serves children in nearly every zip code in the United States, even with sparse coverage in some communities, and its role in stabilizing otherwise threadbare child care systems cannot be overstated. The Trump administration has repeatedly claimed that deregulation streamlines public programs, but this proposed rule would eliminate established practices and risk burdening Head Start providers, states, and counties with complex, fragmented oversight. Programs often do not have comparable places to look for some of these standards to inform their ability to meet the statutory requirements of the Head Start Act. Consequently, program requirements will end up varying significantly from state to state or even

¹²⁸ Office of Head Start, "Head Start History," available at <https://acf.gov/ohs/about/history-head-start>

¹²⁹ Christine Johnson-Staub, "Equity Starts Early: Addressing Racial Inequities in Child Care and Early Education Policy" (Washington, Center for Law and Social Policy: 2017), available at https://www.clasp.org/sites/default/files/publications/2017/12/2017_EquityStartsEarly_0.pdf

¹³⁰ Lauren Bauer and Diane Whitmore Schanzenbach, "The Long-Term Impact of the Head Start Program," The Hamilton Project, August 19, 2016, available at <https://www.hamiltonproject.org/publication/paper/the-long-term-impact-of-the-head-start-program/>

¹³¹ Nadra Nittle, "Study Shows Excellent Preschool Experience Can Narrow Racial Achievement Gap," The Imprint, July 12, 2020, available at <https://imprintnews.org/education/study-shows-excellent-preschool-experience-can-narrow-racial-achievement-gap/45195>

county to county, creating a patchwork of local regulations that threatens Head Start's hallmark of consistent quality across communities, leaving standards dependent entirely on a child's location. This is antithetical to the purpose of the Head Start program, and a failure to uphold the Head Start promise: a program founded not on meeting the bare minimum, but on creating the circumstances that help vulnerable children and their families thrive.

New research from Together for Head Start reveals tangible costs for states, including cuts to health spending, job losses, and increased child care expenses for families who can least afford it.¹³² These estimates range from 83 projected jobs lost in New Hampshire to more than 5,000 in California, and from \$300 in annual child care cost increases in Mississippi to more than \$1,200 in Washington, DC. From coast to coast, vulnerable families would lose critical services, economies would suffer, and children would lose essential early education services.

The proposed rule also undermines Head Start's core mission by weakening holistic family support and early learning requirements, while removing parents from program governance decisions. Excluding parental input conflicts with foundational principles that require services to be tailored to local community needs. Operational flexibility should not justify larger class sizes, reduced protections, or lowered standards. This proposed rule would create 50 different state approaches to Head Start. It would allow programs to step back from the nation's gold standard in early care, ultimately diminishing the demonstrated, evidence-based benefits of Head Start generated through early intervention and family-centered comprehensive services.

For more information, please contact associate director of early childhood policy Hailey Gibbs, Ph.D., at hgibbs@americanprogress.org or managing director of government affairs Madeline Shepherd at mshepherd@americanprogress.org.

Thank you for your time and consideration.

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Correction: A Supplemental Comment was submitted clarifying a minor methodological error in CAP's original letter. Please note that the claims of the original public comment stand, and all takeaways from the preliminary analysis detailed above were consistent with the original letter.

¹³² Together for Head Start, in Partnership with Head Start Associations, "Fact Sheet: The Administration's Proposed Changes to Head Start Will Cut Jobs and Increase Costs for Families," available at https://drive.google.com/file/d/1xg2q-eB6_HmJ3BFc8J5ILEECAzjIEHIB/view