

IHSA Summary of Changes in Notice of Proposed Rulemaking

August 10, 2026

Overview of Impacts

- This NPRM fully rescinds Head Start's high-quality Program Performance Standards and replaces them with few standards and minimal service requirements beyond requirements in the Head Start Act.
- ACF estimates that the proposal will add 116,516 new Head Start slots and 45,578 new Early Head Start slots per year without additional funds invested.
- ACF estimates that the changes proposed will save approximately \$2.2 billion over five years in reduced personnel and programming expenses. The proposal shares that most of the estimated savings would come from fewer teaching positions, serving more children in each classroom, offering fewer hours and days of service, fewer staff in bus monitoring, coaching, home visiting, and mental health services, and reduced administrative costs.

Top-Line Talking Points

- The proposed rule lowers program quality and services for children
 - The standards are the reason Head Start is respected as the gold standard and preserves funding
 - The rule increases the number of children in classrooms and reduces the number of teachers, despite the high levels of need in Head Start classrooms
 - The rule removes standards for teaching and learning that are essential for kindergarten preparedness
- The proposal reduces access and services for the most vulnerable children
 - The rule removes requirements to provide comprehensive services, including timely screenings and mental health services
 - The rule threatens children with disabilities with fewer services
 - The rule threatens children from families that speak other languages, requiring English education that runs counter to Head Start's mission to provide linguistically and culturally appropriate services
- This is not a good faith effort to give programs more flexibility and local control. The Administration claims that programs can continue to provide the same level of quality standards absent regulations, and yet their own proposal predicts that Head Start will see cost savings from a loss of educators, bus monitors, and administrative staff. By their own admission, this rule will increase class sizes, reduce classroom hours, and eliminate key positions that maintain Head Start quality.

Summary of Changes

Governance

- Proposal removes requirements for Parent Committees, adding parent voice to Head Start governance.
- Removes references to Policy Council beyond what is in the Act.

Eligibility, Recruitment, Selection, Enrollment, and Attendance

- Removes the allowability for self-attestation as an acceptable form of documentation to determine eligibility, often used by families experiencing homelessness.

- Removes the allowability for families to attest to a child's age, requiring highly mobile and vulnerable families to produce birth documents that may not be accessible for them.
- Removes all non-statutory requirements for serving children with disabilities.
- Removes language allowing programs to reserve 3% of slots for children experiencing homelessness and children in foster care.
- Requires programs to report staff who violate eligibility determination regulations to OHS.
- Retains eligibility for Head Start for children from families enrolled in SNAP.
- Requires programs to establish their own disciplinary policies, including allowing suspension and expulsion of young children.

Education and Learning Environment

- Requires all education to be provided in English, including replacing all teaching materials in multiple languages.
- Institutes new requirements for physical activity – minimum of 30 minutes per 3.5 hours in program.
- Removes all Head Start standards for group size and child/staff ratios, requiring programs to comply with state licensing and CCDF
- Requires programs to provide educational materials and instruction demonstrating healthy marriage as a “positive good.”
- Removes all requirements related to length of school day and school year (duration).
- Removes all Head Start square footage and space requirements, requiring programs to comply with state licensing.
- Removes all regulatory requirements for home-based services, including requirements on caseload, service duration, make-up requirements, instructional activities, curriculum, staff support, and socialization structure.
- Removes all regulatory requirements for Head Start Family Child Care, other than the requirement that FCCs accommodate children with disabilities. Removes service duration requirements and the requirement to have a child development specialist.
- Removes all regulatory requirements for curricula aside from language in Head Start Act.
- Removes all child assessment and screening regulations

Health and Nutrition

- Removes prohibitions on abuse, neglect, shaming, humiliation, and corporal punishment, and removes requirements for annual staff training on preventing abuse and neglect.
- Removes the federal requirement to supervise children at all times.
- New regulations requiring programs to serve nutrient-dense, whole foods, and providing an opportunity for infants to be served breastmilk where applicable.
- Requires programs to collaborate with parents to promote health, nutrition, and physical activity.
- Removes requirements for health screenings to be conducted in a certain time frame.

- Removes health and mental health requirements, including the requirement to maintain a Health and Mental Health Services Advisory Committee, to obtain advance authorization for health, mental health, and developmental procedures, to have monthly mental health consultation, to assist children with daily teeth brushing, to conduct health determinations, to assist families in navigating health systems, and to facilitate access to health care and insurance.

Safety and Transportation

- Removes transportation requirements, including vehicle safety standards and requirements for use of child safety restraints in moving vehicle, and requires programs to follow state standards.
- Removes the requirement for bus monitors in transportation.
- Removes safety requirements related to facilities, equipment and materials, safety training, hygiene practices, administrative safety procedures, and disaster preparedness.

Services For Children With Disabilities

- Removes all regulations that are not in the Head Start Act, including receiving individualized services while they are being evaluated for IDEA eligibility.

Family Engagement and Program Transitions

- Removes the requirement for Head Start programs to participate in its state's QRIS.
- Removes requirements related to transition services.

Services for Pregnant Women

- Removes requirements to conduct health care determinations, facilitate access to health insurance for pregnant women, provide services that help reduce barriers to healthy maternal and birthing outcomes, and track all services provided to enrolled pregnant women.

Management Systems and Administrative Costs

- Disallows programs from requiring or incentivizing postsecondary education unless they can demonstrate that such educational attainment is necessary for the position based on specified skills that can only be acquired through a particular postsecondary education pathway.
- Programs must identify alternatives to postsecondary education for staff.
- Removes federal background check requirements, requiring programs to comply with state regulations.
- Removes all staff qualification and professional development regulations, including degree requirements for educators.
- Removes requirements providing culturally appropriate staffing, including requirement that staff demonstrate familiarity with the ethnic backgrounds and heritages of families served and that at least one classroom staff member or home visitor to speak the non-English language spoken by a majority of children in a class or program.
- Requires programs to establish policies for personally identifiable information equivalent to FERPA.
- Removes staff health and wellness regulations, including staff breaks, staff health exams, and mental health information for staff.

- Reduces allowable administrative cost from 15% to 5%. The Head Start Act clearly sets the administrative cap at 15%.

Facilities

- Eliminates and simplifies the current facilities application process.

Designation Renewal

- Redesigns the ways in which programs enter the Designation Renewal System with significantly less detail and objectivity.
- Removes CLASS scores from DRS consideration.

Program Flexibility

- Allows for waivers for any requirements in standards, except for standards related to nutrition, physical activity, or eligibility.
- Reduces standards for locally designed options.

Appeals and Other Federal Procedures

- Removes standards for monitoring beyond what is in the Act.
- Removes requirements on grant suspension and termination which maintaining the authority to suspend and terminate grants.
- Removes regulations for delegate agencies beyond what is in the Act.