



Together for Head Start

IN PARTNERSHIP WITH HEAD START ASSOCIATIONS

August 6, 2026

On August 6, 2026, the Department of Health and Human Services shared proposed changes to the Head Start Program Performance Standards. The proposed changes represent the largest ever overhaul of the standards. If enacted, these changes would significantly impact the children and families served and the services that they receive. The proposed regulation is on display [here](#).

This is a proposed rule and is open for public comment for 60 days. After the comment period, HHS must review and respond to comments before issuing a final rule. **Head Start programs should not change how they operate based on this proposal**. Any changes would take effect only after a final rule is published and an effective date is announced, a process that will likely take several months.

Join Together for Head Start for a webinar on August 7, 2026 at 2pm CT/3pm ET to learn more about the proposed standards and how to comment. Register [here](#) and find additional resources [here](#).

Here are the main takeaways, with further analysis to follow. This is not a comprehensive list of changes.

- 1. Eliminates most Head Start standards.** The proposal eliminates most of the Head Start standards, including mention of standards related to health, mental health, oral health, and developmental screenings. Most teaching and learning standards have been removed. References to the Parent Policy Council are also removed and parent committees are changed from required to optional. The current standards are about 50,000 words and the proposal is approximately 3,600 words, reflecting more than a 90% reduction in the standards. The preamble mentions the statutory requirements related to teaching and learning, comprehensive services, and parent engagement, but they are no longer part of the HSPPS and HHS claims the program will cost less to administer due to these changes.
- 2. Changes to eligibility procedures.** The proposed rule eliminates self-attestation as an acceptable form of documentation to determine eligibility, which will have significant impacts on children experiencing homelessness. Self-attestation is also often used to establish a child's age and could have broader implications for families that do not have immediate access to documentation, delaying enrollment and removing access for some families. The proposed standards no longer state that programs can reserve 3% of slots for children experiencing homelessness and children in foster care. Finally, the proposal includes a requirement for programs to report staff who violate eligibility determination regulations to HHS. HHS indicates that it retains the provision that allows families to demonstrate eligibility for Head Start if they are enrolled in SNAP, although this is not codified in regulation.

3. **Removes quality teaching and learning standards.** The proposal removes most requirements related to teaching and learning, including requirements for teacher training and coaching, curricula, group size, and teacher-child ratios. The proposed rule instructs Head Start programs to follow the child care licensing requirements in their state for group size and ratios. This applies to programs regardless of whether or not they are required to be licensed by their state. According to the [Children's Equity Project](#), this provision would result in larger class sizes (and by extension less individual attention) for 80% of children enrolled in Head Start.
4. **Eliminates health and safety standards.** The proposal eliminates critical health, safety, and quality measures. It removes prohibitions on abuse, neglect, shaming, humiliation, and corporal punishment. Requirements for annual staff training on preventing abuse and neglect are removed, and the requirement to supervise children at all times is also removed. Programs are still required to report child health and safety incidents to the Office of Head Start within 7 calendar days. The proposed rule shifts oversight over background checks and transportation practices in Head Start programs to states.
5. **Weakens Policy Council and parent role.** The proposed standards remove several protections for parent decision-making. They do not include impasse procedures that describe what happens when the Policy Council, which is composed of majority parents, and the Governing Board do not agree. Current standards require a third-party mediator to facilitate a solution. Without impasse procedures, the Governing Board can override the Policy Council and parents. The proposal also removes the requirement for parent committees and makes these optional.
6. **Significantly weakens comprehensive services.** The proposed standards remove most mentions of health and mental health, dental care, and developmental screenings. Instead, the revised standards require that a "program must establish goals and measurable outcomes including provisions of evidence-based educational practices, health, nutritional, and family engagement." Programs need to provide these services only as required by the Head Start Act. The proposal eliminates the requirement to provide a developmental screening within 45 days of enrollment and to determine within 90 days whether a child has a medical and dental home. The proposal also removes requirements to track follow-up care and ensure children receive treatment and intervention for any identified issues.
7. **Removes services related to maternal and infant health.** The proposed rule removes many provisions related to services for pregnant women, expectant families, and newborns. The rule retains a requirement for a newborn visit and some educational requirements for expectant families, but removes current requirements related to timely medical care for the mother and newborn. The proposed rule removes requirements for key evidence-based aspects of the Early Head Start home visiting model, including caseload, visit duration, and home visitor qualifications.
8. **Requires all instruction to be in English.** A new requirement states that all instruction for children must be conducted in English, with an exception for Tribal grantees that include Tribal languages as part of their heritage. The proposed rule removes standards for serving dual language learners,

including supporting the child's home language alongside English and conducting assessments and family engagement services in the preferred language of the child and family.

9. **Reduces the administrative cap.** The proposal reduces the administrative cap from 15% to 5%. This change applies to federal funds and the non-federal match. The Head Start Act sets the administrative cap at 15% with the option of a waiver. Under the proposal, programs can apply for a waiver from the new 5% limit, provided it is approved by OHS.
10. **Removes additional services for children with disabilities.** The proposal eliminates requirements that children with disabilities receive services that allow them to fully participate in all aspects of the Head Start program, including receiving individualized services while they are being evaluated for IDEA eligibility. Instead, the proposed regulation requires Head Start programs to follow applicable federal and state statutes in providing services to children with disabilities. HHS notes that the Head Start Act requires the Secretary to provide procedures for referrals and services for children with disabilities and indicates that it will provide future policies on services for children with disabilities. HHS does not indicate what these policies might be.
11. **Removes suspension and expulsion prohibitions.** The proposed standards eliminate prohibitions on suspending or expelling children from the Head Start program. Current standards provide limits on suspensions as a last resort in situations involving a serious safety threat, and require programs to take all possible steps to meet the child's needs and help the child return to the program. Current standards also prohibit expulsion. HHS indicates that programs should adhere to local and state licensing requirements and their own approach to discipline.
12. **Adds new staff hiring considerations.** The proposal adds new "hiring considerations" that prohibit programs from requiring or incentivizing post-secondary education credits, hours, or credentials unless the program can demonstrate that the position requires skills that can only be obtained through this pathway. In addition, programs would also have to allow other ways to demonstrate the required skills, such as assessments, industry-recognized credentials, or relevant work experience. Statutory education requirements for certain Head Start positions would remain.
13. **Adds nutrition and physical activity requirements.** The proposal adds requirements to provide "nutrient-dense, whole foods compatible with The Dietary Guidelines for Americans" and requires programs to talk with parents about healthy eating, physical activity, preparing healthy meals and the negative consequences of "sugar-sweetened beverages and grain-based desserts." The proposed standards also require programs to provide at least 30 minutes of physical activity per 3.5 hours of programming, with a preference for outside activities.
14. **Removes details on how the Office of Head Start will designate grants for competition.** The proposed standards remove much of the detail about how the Office of Head Start (OHS) will determine whether a grant must be competed. They retain conditions that result in a grant being designated for competition, as under the current standards, but include significantly less detail. For example, the

proposed standards mention that a grant is subject to competition if it receives two deficiencies, but they remove the reference to the “relevant time period.” They also remove specific references to CLASS and its competitive thresholds. Instead, the proposed standards state that a grant may be competed if an “agency has been determined not to be delivering classroom quality,” with a reference to the applicable section of the Head Start Act. They also include an additional catch-all condition for other measures specified in the Head Start Act. It is not clear from the revised standards how OHS plans to implement the Designation Renewal System (DRS) or make these determinations in practice.

- 15. Allows waivers for some provisions.** The proposed rule indicates that programs can apply for waivers (provided they do not violate state or federal statute and do not impact child health or safety) for any provision of the standards, except for eligibility, nutrition, and physical activity. This presumably includes the English-only language provision and administrative cap, but OHS would need to approve each individual program’s waiver request.

Regulatory impact analysis

HHS’s analysis estimates that the changes in the proposed rule could result in up to an additional 236,000 children served in Head Start programs. These estimates are based on assumptions about how much funding programs would save by meeting the proposed standards and how those savings would be used. The proposal says that these changes could free up about \$2.2 billion a year by 2031. But that does not mean Head Start programs would receive \$2.2 billion in new federal funding. **The proposal adds no new funding to the Head Start budget.**

Most of the estimated savings would come from Head Start programs:

- Having fewer teachers or other staff;
- Serving more children in each classroom;
- Offering fewer hours of service;
- Spending less on coaching, home visiting, health, and mental health supports; and
- Moving money from administration to direct services.

The largest estimated cost savings (ranging from \$334 million to \$1 billion) come from an expectation that Head Start programs will change teacher-child ratios, with each teacher taking care of more children. The proposal estimates a 16% to 32% increase in the average number of children per teacher.

The analysis also estimates savings from lowering the maximum administrative-cost cap from 15 to 5%. Administrative spending can include fiscal management, human resources, information technology, data systems, facilities management, and organizational leadership. These functions do not disappear because the allowable percentage is lowered. Programs might reclassify some work, share functions, reduce administrative staffing, cut other operations, or request waivers. The proposal reports that:

- Only 3.7% of Head Start grants currently operate at or below 5% in administrative costs.
- Another 27.7% operate between 5 and 10%.
- The estimated amount that would have to be moved out of administrative costs is \$754 million.

- About half of Head Start grants serve 200 or fewer children, meaning many smaller programs have fewer participants over which to spread fixed administrative costs.

In general, the estimated savings depend heavily on programs reducing staffing and services, including having larger group sizes, fewer teachers and support staff, shorter program days, fewer home visits, and fewer health and mental health supports. The analysis places a dollar value on those reductions while leaving many potential consequences for Head Start children, families, staff, program quality, and state systems unpriced. These possible consequences include:

- Families needing other child care if program hours are shortened;
- Effects of larger classes and fewer teachers on classroom quality;
- Effects of fewer home visits, coaches, mental health consultants, and family-service staff;
- Barriers for families that cannot easily produce eligibility or age documentation;
- Educational and family-engagement effects of English-only instruction;
- Staff workload, turnover, burnout, and employment losses;
- Differences between stronger and weaker state licensing systems; and
- Additional state or local responsibilities created by relying more heavily on state standards.

The proposed rule says the freed-up money could support up to 236,000 more Head Start slots. However, it does not provide new funding or require programs to use the savings to create new slots.

The proposed rule would require most Head Start education to be provided in English, and estimates this could affect about 18,800 classrooms, or 1/3 of non-Tribal Head Start settings. The proposal estimates the change would create about \$99 million in one-time costs, including:

- \$47 million to replace curricula, books, toys, and other materials containing non-English words.
- \$52 million to retrain teachers or recruit and hire new staff.

The proposal also estimates about \$139 million in possible harm to workers if some teachers lose or change jobs rather than receive training to meet the new English-only requirement.

Estimated Annual Spending Reductions

Projected annual reductions at full implementation in 2031

Proposed flexibility	Primary annual reduction assumed
Following state teacher-child ratios instead of current Head Start ratios	\$668 million
Reducing Head Start Preschool service hours	\$214 million
Reducing coaching expenditures	\$179 million
Reducing home visitor staffing due to changes in visit frequency, duration, and caseloads	\$173 million

Reducing health and mental health personnel and contracted-service expenditures	\$111 million
Reducing compensation for certain non-teaching positions by removing qualification requirements	\$57 million
Reducing bus-monitor staffing	\$40 million
Reducing child development specialist positions	\$19 million
Reducing staff time for required data analysis and community-assessment activities	\$2.5 million