



Proposed Changes to the Head Start Performance Standards

Updated on August 17, 2026

The Notice of Proposed Rulemaking (NPRM), "[Reducing Federal Burden on Head Start Programs](#)," published on August 7, 2026, would substantially reorganize the Head Start Program Performance Standards (HSPPS) by removing or revising nearly every current regulatory requirement and adding several new requirements. In areas where the existing regulations would be eliminated or significantly revised, programs would instead be directed to comply only with relevant federal statutes, including the Head Start Act, the Individuals with Disabilities Education Act (IDEA), and the McKinney-Vento Homeless Assistance Act, as well as state and local requirements.

The Administration of Children and Families (ACF) states that the proposal is intended to reduce unnecessary administrative burden, improve regulatory clarity, promote children's health, nutrition, and physical activity, and focus Federal oversight on statutory requirements rather than duplicative regulatory provisions.

The National Head Start Association (NHSA) plans to release more detailed summaries of the proposed regulatory changes, resources that will assist in submitting comments, and the Regulatory Impact Analysis in the weeks ahead. Because the proposed rule removes or changes nearly every regulation, NHSA is continuing to review the proposal and discussing the impact with programs and families to ensure the analysis is complete and accurate. NHSA urges any and every stakeholder to submit comments by October 6, 2026, emphasizing details and specifics for how the proposal could be harmful, helpful, or could be changed to strengthen and support services provided to children and families. **These proposed changes are not final and Head Start programs do not have to make any operational or budget changes based on this proposal.**

The following provides a high-level overview of the key proposed changes, as well as ACF's estimates of the proposal's potential cost savings:

Key Changes

- **Reduced Cap on Administrative Costs:** Administrative costs would be capped at 5% of total approved program costs, down from 15% including the required non-Federal match. ACF predicts this change corresponds to an estimated reduction in administrative expenditures of \$754,343,701 annually, and described it as reinvestment, rather than savings.
- **Staff-to-Child Ratios May Align with States:** The proposed rule would remove the current federal standard for Head Start staff-to-child ratios and group sizes. Instead, programs would establish and publish staff-to-child ratios and group sizes consistent with state and local laws and CCDF regulations.
- **Parent Committees Optional:** Parent committees would become optional (Governing Bodies, Policy Councils, and Policy Committees remain required by the Head Start Act). Parent committees are made up of currently enrolled parents at the site level and advise on the development and implementation of activities and services that best meet the needs of their children.
- **Programs would no longer be able to require degrees or credits that are not necessary for positions.** The proposal would remove all qualification requirements for non-teaching positions, further addressed below. It would also prohibit programs from incentivizing or requiring post-secondary degrees, credits, hours, or credentials unless the program can demonstrate that they are necessary for the position.

Key Removals

- **Detailed regulations for serving children with disabilities would be removed.** Programs would continue to follow the requirements of the Head Start Act and the IDEA, while the proposed regulations would remove specific requirements related to early support services, referrals, coordination of services, and other disability-related requirements.
- **Families would no longer receive the same level of health care coordination.** While the Head Start Act requires health, developmental, vision, and hearing screenings, the proposed rule would remove specific, research-backed timelines for those screenings. Programs would no longer be required to determine whether children have an ongoing source of health care to ensure children receive necessary care when they begin attending Head Start.
- **Programs would be able to suspend or expel children.** Current Head Start regulations prohibiting expulsions and limiting suspensions would be removed. While the Head Start Act does not include statutory requirements regarding suspensions and expulsions, some states may have similar protections.
- **Families would no longer be able to enroll without documentation.** The proposed rule would no longer allow family self-attestation to satisfy eligibility requirements for homelessness, income, or proving a child's age. ACF estimates 8% of currently enrolled children would no longer be eligible without further documentation. Staff that violate eligibility requirements would need to be reported to HHS.
- **Housing cost adjustment for eligibility determinations would be removed.** Programs would no longer be permitted to reduce a family's gross income for eligibility purposes based on housing costs exceeding 30% of annual gross income.
- **Staff qualifications for non-teaching staff would be removed.** All staff qualifications are proposed to be removed, which includes those for Head Start directors, fiscal officers, family/health/disability managers, family child care workers, family service workers, and home visitors. The Head Start Act only specifies requirements for Head Start teachers, assistant teachers, and education coordinators. ACF assumes reduced costs due to programs' ability to lower compensation for these positions.
- **Programs would only be required to provide three hours of service per day.** The proposal would remove specific federal regulations governing the yearly hours requirement for duration of center-based Head Start Preschool, home-based, and family child care services. The Head Start Act would continue to require programs to provide at least three hours of service per day. Early Head Start would continue to provide full-day, year-round services.
- **All federal regulations governing the home-based option would be removed.** The home-based option is protected in the Head Start Act, but the Act does not provide specific implementation details. The regulations proposed for removal include caseload limits, service duration, make-up requirements, program design, and curriculum. ACF assumes reduced costs from shortening home visits, increasing caseloads, and adjusting staffing.

Key Additions

- **English-Only Instruction:** Programs would be required to provide English-only instruction (excluding Tribal programs), with instruction for children with limited English proficiency focused on learning English. Programs would have to replace curriculum, instructional material, and books that contain non-English content and retrain or recruit teachers to be able to comply. Waivers may be granted.
- **Physical Activity:** Programs would be required to provide children with at least 30 minutes of physical activity for every 3.5 hours of program participation, with activities taking place outdoors when possible.
- **Nutrition:** Programs would be required to have staff or consultants to support nutrition services and provide parents with education on children's nutrition, healthy eating, and physical activity.

- **Healthy Marriage:** Programs would be required to provide educational materials and instruction demonstrating the value of healthy marriage.
- **Expanded Waiver Authority:** The proposed rule would broaden waiver authority by allowing programs to request waivers for most regulatory requirements, including the administrative cost cap and non-Federal match, except for eligibility, nutrition, and physical activity requirements. Waivers must comply with federal law and cannot compromise children's health or safety.

Cost Savings and Slots

ACF estimates that the proposed rule could reduce Head Start program expenditures by approximately \$2.2 billion annually. The Regulatory Impact Analysis estimates these savings could support approximately 116,516 additional Head Start Preschool slots and 45,578 additional Early Head Start slots. This cost estimate is based, in part, on ACF's assumptions that programs would reduce staffing under the proposed rule, including eliminating bus monitors and reducing the number of family service workers, health and mental health personnel, child development specialists, home visitors, and Head Start teachers and assistant teachers. Other estimated cost savings assume programs increase staff-to-child ratios, reduce Head Start Preschool service hours, and reduce compensation for certain non-teaching positions due to the removal of qualification requirements. ACF notes that these estimates assume full implementation by 2031, and do not account for future appropriations increases or cost-of-living adjustments.

The cost savings estimate is separate from the administrative cap reduction, which is categorized as a "reinvestment" that results in \$754,343,701 in funds that can be reallocated by the grant recipient.

The proposed rule includes a severability provision stating that, if any provision is invalidated by a court, ACF intends for the remaining provisions to remain in effect to the greatest extent possible.

You can view the NPRM in the Federal Register [here](#) and access the full PDF [here](#):

Key sections:

- Executive Summary: p. 51249
- Current Regulation / Proposed Regulation / Statute Comparison Table: p. 51251
- Section-by-Section Explanation of Proposed Changes: p. 51262
- Definitions: p. 51280
- Regulatory Impact Analysis: p. 51286
- Estimated Impacts: p. 51307
- Proposed Head Start Program Performance Standards (Full Regulatory Text): p. 51318

For more information, visit NHSA's website or email advocacy@nhsa.org.