To: U.S. Department of Health and Human Services, Administration for Children and Families, Office of Head Start

From: The Learning Policy Institute

RE: RIN 0970–AD30; Docket No. ACF–2026–0595, Reducing Federal Burden for Head Start Programs

Date: September 8, 2026

The Learning Policy Institute (LPI) appreciates the opportunity to provide comments to the U.S. Department of Health and Human Services (the Department) regarding the Department's proposal to rescind and replace the current Head Start Program Performance Standards. LPI conducts and communicates independent, high-quality research to improve education policy and practice. Working with policymakers, researchers, educators, community groups, and others, LPI seeks to advance evidence-based policies that support equitable and empowering learning for each and every child.

Head Start was created in 1965 to reduce the effects of poverty on children's learning by providing a comprehensive set of supports to help children from families with low income thrive in school and life.[1] Decades of research demonstrate the positive impacts of Head Start for young children and their families. For example, studies have shown that the program prepares young children for school,[2] increases their educational attainment,[3] and supports maternal employment.[4] Benefit-cost analyses likewise indicate positive returns to Head Start investments, meaning that in the long term, the program pays for itself.[5]

Head Start provides critical services to more than 700,000 families with young children each year,[6] and the need for the kind of high-quality services that Head Start provides has only increased. Child poverty rates in the United States (U.S.) have grown by more than 50% since the 1970s and are among the highest in developed nations.[7] As a result, programs like Head Start carry a larger share of the responsibility—and costs—for helping to ensure that all children have the support they need to learn and grow.

Head Start's education standards also set the quality standards for Title I preschool programs.[8] School-based preschool programs play an increasingly critical role in the education of young children. Nationwide, 57% of elementary schools have a preschool program, and 81% of those preschools are in Title I schools.[9]

LPI is deeply concerned that the proposed changes would diminish the quality of the services that children and families receive and negatively impact their well-being and future academic success. The proposed rule may also violate the Head Start Act, including its prohibition on any reduction of the "quality, scope, or type" of services and the Act's requirement that the Secretary take research-based practices into consideration when promulgating regulations.[10] Several of the proposed changes outlined below would not meet these statutory requirements. **For these reasons, LPI strongly recommends that the Department withdraw the proposed rule and keep the current Head Start Program Performance Standards in place.**

While LPI has many concerns with the proposed rule, including its potential misalignment with the statutory requirements, our comment focuses on five areas of the proposed changes to illustrate the potential impact on children and their learning environments:

1. Group size and child-adult ratios;
2. Service duration;
3. English-only instruction and supports for dual language learners;
4. Coaching and professional support for staff; and
5. Enrolling and supporting children experiencing homelessness.

Below we describe these concerns.

1. Group Size and Child-Adult Ratios

The proposed rule would rescind Head Start's current maximum child-adult ratio and group size requirements, deferring instead to state child care licensing standards.

Maintaining small group sizes and favorable child-adult ratios in early childhood education (ECE) settings supports children's learning by setting the stage for the responsive, warm interactions that drive children's learning and development.[11] A 2017 meta-analysis linked small group sizes and better child-adult ratios in ECE to benefits for children's early academic skills.[12] A small experimental study found that children in smaller preschool classes tended to engage in more one-on-one interactions with their teachers and show greater gains in literacy skills by the end of the year.[13] A 2026 meta-analysis likewise found that less favorable child-adult ratios were associated with reduced ECE quality, echoing the findings of another, earlier synthesis.[14]

Head Start currently requires a maximum of four children per adult for children under age 3, eight children per adult for 3-year-olds, and ten children per adult for 4-year-olds.[15] The state child care licensing standards that would replace Head Start's current requirements almost uniformly permit larger group sizes and less favorable child-adult ratios, contrary to what evidence suggests is best for children. One state-by-state analysis found that no state in the nation requires ratios as strong as Head Start's across all age groups. The analysis also indicated that if Head Start programs adopt the ratios set by state licensing, 80% of Early Head Start or Head Start children would experience a worse ratio (i.e., a higher number of children per adult) than is currently required by federal regulations.[16] The gaps between ratio requirements in child care licensing standards and Head Start standards are particularly large for toddlers in many states. For example, in nine states, child care licensing standards allow adults to supervise at least double the number of children as in Head Start programs.[17] The proposed change to relax these standards could therefore reduce the quality of learning and care across Head Start.

2. Service Duration

The proposal to rescind the center-based Head Start Preschool service duration requirements may additionally cause harm by dramatically reducing the number of days and hours children receive care. The new rule would allow programs to operate for as few as 448 hours per year, whereas the current regulations require that at least 45% of Center-based preschool programs operate for at least 1,020 hours per year.[18] The Department projects that the new flexibility will lead to a reduction of 33 to 99 hours per child per year.[19] While these projections have yet to be verified, it is clear that the proposed rule may reduce program duration.

Offering fewer service hours will negatively affect children, their families, and the economy.[20] For children, full-day Head Start programs tend to benefit learning more than part-day ones.[21] For example, one study found that Head Start centers offering full-day services produced larger

cognitive effects for children than centers that did not.[22] Evidence from other early learning contexts further supports the benefits of full-day early childhood programming. A 2019 experiment from a Colorado school district found that offering full-day (vs. half-day) preschool benefitted children's school readiness in domains such as language and teacher-reported math and social-emotional development.[23] Full-day preschool also reduced special education designations in the early grades, particularly among children whose primary language was not English.[24] Full-day kindergarten has similarly been shown to benefit children's early academic skills relative to part-day programs.[25]

Offering adequate service duration also supports the fit of Head Start programs with family preferences and needs. Descriptive data from the Head Start Impact Study showed that families were likelier to return for a second year to Head Start programs offering full-day services versus part-day options.[26] In selecting ECE for their children, families often consider whether the available hours align with caregivers' work and school schedules.[27] About 70% of Head Start families have at least one caregiver employed, in training, or in school,[28] suggesting that the program functions as child care for many participating families.

Reducing duration may have negative impacts on the Head Start workforce. For example, the Department projects a $214 million annual reduction in teacher compensation due to reduced hours. While this number has not been independently verified, given that Head Start programs are already facing hiring challenges with current low compensation levels,[29] any reduction may make it even harder to recruit and retain staff.

Finally, reducing hours for children may also have ripple effects on labor and business. More broadly, access to affordable ECE supports parental labor force participation, especially among mothers.[30] Inadequate availability of child care for working parents is also understood to carry economic costs, such as reduced productivity and tax revenue.[31] In contrast, spending on ECE produces economic multiplier effects as providers purchase goods and services to operate their programs and pay teachers, among other activities.[32]

3. Language and Support for Children Who Are Dual Language Learners

The Department's proposal to require that programs conduct all education to children in English is contrary to what the research suggests is best for all children's learning and development, including how to effectively support dual language learners' English language proficiency. As such, the proposed rule appears to violate the Head Start Act's requirement that the standards be "developmentally, linguistically, and culturally appropriate for the population served."[33]

About a third of all children from birth to age 5—more than 7 million children—are dual language learners in the United States.[34] Dual language learners also comprise a meaningful share of Head Start participants. In 2025, about 37% of Head Start children were dual language learners.[35] Communication in multiple languages offers children connections to family culture and supports children's development in domains such as executive function and oral language.[36] As other leading countries have recognized and valued, it also serves to prepare students for an increasingly global economy.[37]

Research has found that dual language learners, particularly those who are Spanish-speaking, demonstrate positive learning gains from Head Start participation, including relative to other children. For example, an analysis of the impact heterogeneity in the Head Start Impact Study found larger effects on the receptive vocabulary and early numeracy skills of dual language

learners and Spanish-speaking children at the end of the program year than for other children in the study.[38] Evaluations of other high-quality early care and education programs have likewise identified benefits from participation for dual language learners' development, especially in language and literacy and for Spanish-speaking children.[39]

Rather than impeding English language development, primary language support and instruction (which Head Start currently requires) enhance it. A 2017 consensus report from the National Academies of Sciences, Engineering, and Medicine concluded that extending primary language instruction and support, alongside exposure to English, is an effective strategy to promote dual language learners' development in both languages.[40] For example, in one observational study, receiving Spanish instruction in Head Start was positively linked to English vocabulary development among Spanish-speaking children.[41] There is also evidence that offering primary language support helps the development of dual language learners without compromising the learning of monolingual speakers in their settings.[42] Current Head Start standards are aligned with this evidence base,[43] requiring support for children's home language development in addition to English and ensuring that at least one staff member speaks the language of the majority of children in a class.

In addition to being harmful for children's learning and development, switching from a bilingual approach to English only will be costly, particularly for communities most in need. The Department projects $47 million in one-time costs to replace curricula and classroom materials containing non-English content and $52 million in teacher retraining and recruitment costs, with as many as one third of teachers needing to be displaced or retrained.[44]

4. Coaching and Professional Support for Education Staff

There is strong evidence to suggest that the removal of the Head Start Program Performance Standards requirement to provide intensive coaching to staff who need it could negatively impact teachers' abilities to meet children's learning needs and therefore negatively impact children's development. Coaching is a demonstrably effective approach to professional learning that provides educators with tailored, expert support to improve their teaching practice[45] and children's learning.[46] A recent meta-analysis of more than 124 early childhood studies found that coaching benefitted teachers' practices, knowledge, and beliefs, as well as children's outcomes, compared to business-as-usual supports in their settings.[47] Other research has likewise identified benefits from coaching for the quality of teacher-child interactions[48] and for children's outcomes in domains such as literacy and positive behaviors.[49]

The Department's projection that coaching staff will be reduced by 25% to 75% is highly concerning. The Head Start Act mandates that each teacher receive at least 15 hours of professional development annually that is "high-quality, sustained, intensive, and classroom-focused" and regularly evaluated by the program for its effectiveness.[50] While the proposed regulations retain this mandate, they would eliminate the very mechanism programs use to meet the requirement. And although there is a statutory mentor teacher requirement, that is a distinct requirement that is no substitute for what would be lost. Further, the rescinded regulations included a requirement for programs to assess education staff to identify who needs support, conduct observation and feedback cycles, model effective practice, align supports with school readiness goals, or ensure that the person providing the support is qualified to provide it. These evidence-based supports[51] are not included in the proposed rule and would no longer be required of Head Start programs.

5. Enrolling and Supporting Children Experiencing Homelessness

The proposed rule removes almost all current rules clarifying how programs must support the enrollment of children experiencing homelessness. For example, the rule removes the ability of a family to self-attest that they have no income, which may have a particularly harmful effect on children experiencing homelessness, whose families may find it challenging to quickly produce the documentation required to enroll.[52] The rule removes the requirement that programs actively locate and recruit students experiencing homelessness, which is problematic since families experiencing homelessness are often reluctant to self-identify due to stigma. The proposed rule would also remove regulations that allow programs to reserve open spaces for children experiencing homelessness when a vacancy occurs.

The removal of the provisions related to enrolling children experiencing homelessness will almost certainly result in reduced enrollment for this vulnerable population. For example, the Department's analysis projects that there will be an 8% reduction in enrollment if families are no longer able to self-attest their eligibility.[53] What is more, the lack of any regulatory language in the proposed rule may violate the Head Start Act, which requires the Secretary to "issue rules to establish policies and procedures to remove barriers to the enrollment and participation of homeless children in Head Start programs."[54]

Experiencing homelessness is a risk factor for delayed physical, academic, and social-emotional development among children,[55] as well as diminished caregiver health and mental health.[56] Though participating in ECE appears to mitigate these risks and promote children's development and learning,[57] few young children experiencing homelessness do so. A national analysis of 2022–23 data estimated that only 10% of young children experiencing homelessness were served by an early care and education program.[58] Removing the option to self-attest eligibility would create new barriers to Head Start enrollment among families experiencing homelessness, despite the benefits of participation.

Conclusion

The statutory purpose of Head Start is to "promote the school readiness of low-income children by enhancing their cognitive, social, and emotional development" through a learning environment that supports child development and through "health, educational, nutritional, social, and other services" to children and families.[59] The Head Start Program Performance Standards were written to ensure that these high standards were met—without them, the program, and the federal funds invested, will not deliver on its promise. We therefore urge the Department to maintain the current Head Start Program Performance Standards.

We appreciate your consideration of these comments. Please contact Sara Plasencia at splasencia@learningpolicyinstitute.org for any additional information.

Endnotes

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[10] Section 641A(a)(2)(C) of the law explicitly requires that the Health and Human Services Secretary shall "ensure that any . . . revisions in the Standards will not result in the elimination of or any reduction in quality, scope, or types of health, educational, parental involvement, nutritional, social, or other services required to be provided under such Standards as in effect on" 12/12/07. Section 641A(a)(2)(B) of the Head Start Act, 42 U.S.C. § 9836a(a)(2)(B) mandates that the Secretary consider various factors, including research-based practices in early childhood education and homeless children, as well as changes in the language background and housing circumstances of the eligible population.

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