



Head Start Under Threat: What the Field is Saying

A summary of partner statements, resources, and actions

Compiled August 14 – September 22, 2026

Over the past few months, HHS has advanced two related sets of proposed changes to Head Start. National, state, and local partners across the early childhood field have raised serious concerns about both. Below is a summary of what our partners are saying, followed by concrete actions and resources for you and your organization. The content below reflects our partners' own statements and comments — we agree with what they've said and are sharing it here with full source attribution.

BACKGROUND: TWO RELATED PROPOSED RULES

On May 12, 2026, ACF published a narrower proposed rule (Docket ACF-2026-0364) rescinding the 2024 final rule's wage and benefit requirements for Head Start staff; its comment period closed June 11, 2026, with CAP, SEF, and a 100+ organization coalition led by CLASP/CAP/NWLC/NAEYC submitting comments opposed.

Source: [Federal Register notice](#)

On August 7, 2026, ACF published a much broader proposed rule (Docket ACF-2026-0595) that would rescind and replace the full Head Start Program Performance Standards — eliminating an estimated 80% of current standards, including federal staff-to-child ratios, teacher credential requirements, disability service guidelines, and protections for children experiencing homelessness, in favor of state child care licensing minimums. Its comment period is open now through October 6, 2026. This is the proposal most of the statements below are responding to.

Source: [HHS/ACF press release](#) | [Federal Register notice](#)

Date	What Happened
May 12, 2026	ACF-2026-0364 published — proposal to rescind the 2024 wage/benefit standards for Head Start staff
June 11, 2026	Comment period closed for ACF-2026-0364 (CAP, SEF, and the CLASP/CAP/NWLC/NAEYC coalition submitted opposition comments)
August 7, 2026	ACF-2026-0595 published — broad rewrite/rescission of the full Head Start Program Performance Standards
October 6, 2026	Comment period closes for ACF-2026-0595 — OPEN NOW

WHAT THE FIELD IS SAYING

Organizations listed alphabetically. Each summary reflects that organization's own published statement or comment. Partners with recent or upcoming activity get a full write-up below; partners whose position hasn't changed since an earlier update are listed in condensed form under “Also on Record” so this document doesn't grow indefinitely.

→ → Updated September 22

This update adds new items from NPR/SchoolHouse Connection, Georgetown's Center for Children and Families, First Five Years Fund, and the SBA Office of Advocacy, plus **NHSA's new parent sign-on letter** (sign by September 30) and First Five Years Fund's new state-by-state fact sheets (Sept. 18) — look for these entries below. Also: **Start Early's disability-focused webinar** on the proposed rule is tomorrow, September 23 at 3:00–4:00 PM ET — see Upcoming Opportunities to register.

First Five Years Fund (FFYF)

FFYF argues that “changes of this size and scope should be made through the legislative process” rather than by regulation, and raises five specific concerns: eliminating federal staff-child ratios; mandating English-only instruction despite research favoring dual-language learning (more than a third of enrollees are dual language learners); cutting the administrative cost cap from 15% to 5%, even though only 3.7% of programs currently operate that low; replacing specific homelessness-enrollment procedures with a single eligibility sentence; and rolling back proactive disability and discipline supports.

Source: [First Five Years Fund, “The Head Start NPRM” analysis, updated Sept. 1, 2026](#)

On September 10, FFYF published a **new public-comment how-to guide** with a structured comment template and step-by-step instructions for submitting through Regulations.gov, aimed at helping parents, providers, and advocates file effective, personal comments before the October 6 deadline.

Source: [First Five Years Fund, “Head Start NPRM: Public Comment How-To Guide,” Sept. 10, 2026](#)

On September 18, FFYF's weekly “Friday Five” roundup highlighted its newly released state-by-state fact sheets showing Head Start's funding, enrollment, and program reach in every state — a resource for grounding public comments and outreach in state-specific data.

Source: [First Five Years Fund, “Map: Head Start State Fact Sheets,” via “The Friday Five,” Sept. 18, 2026](#)

Georgetown Center for Children and Families (CCF)

A **September 11 analysis** by Nancy Kaneb and Elisabeth Wright Burak of Georgetown University's Center for Children and Families — a separate center from Georgetown's Center on Poverty and Inequality, cited later in this summary — flags the proposed rule's removal of continuous health-coverage requirements, monthly mental health consultations and follow-ups, and staff-to-child ratios. The authors cite research showing Early Head Start participants have higher immunization rates and better access to disability services, and warn the timing compounds new Medicaid eligibility restrictions under H.R. 1 just as families will need more help navigating coverage, not less.

Source: [Georgetown Center for Children and Families, “Proposed Head Start Rule Would Further Undermine Child and Family Health,” Sept. 11, 2026](#)

MomsRising

MomsRising is running a letter-to-the-editor campaign asking supporters to reach their local paper and call on Congress to protect Head Start, alongside a tool for families to share their own Head Start stories. Their materials warn the changes would raise paperwork and eligibility barriers for families, worsen classroom ratios, lower teacher credential requirements, remove disability service guidelines (Head Start currently enrolls at least 10% children with disabilities), and hit rural communities hardest, since Head Start is often the only reliable early learning option available there.

Source: [MomsRising, “Action Alert: Stand Up for Head Start” — letter-to-the-editor tool | share your Head Start story](#)

National Head Start Association (NHSA)

- NHSA's new research brief, “More Powerful Than We Thought,” adds important context, examining how traditional evaluations may underestimate Head Start's impact — particularly for children who otherwise would not have had access to formal early learning — and looking beyond children's immediate outcomes to benefits for parents and even the next generation.

Source: [NHSA, “More Powerful Than We Thought” research brief, Aug. 2026](#)

- In an August 25 statement, NHSA identified five areas of concern with the broader NPRM: cutting the administrative cost cap from 15% to 5%, which could strip away background checks, audits, and other infrastructure that keeps programs safe and accountable; requiring English-only instruction rather than holding programs accountable for English-proficiency outcomes; replacing specific disability-services requirements with a general instruction to follow existing law, which NHSA warns could delay early identification; removing specific health, mental health, dental, and vision screening requirements; and eliminating federal staffing ratios and required hours in favor of state minimums. “Fewer rules cannot equal fewer results,” said Executive Director Yasmina Vinci.

Source: [NHSA, “Head Start Can Modernize Without Lowering the Bar,” Aug. 25, 2026](#)

- NHSA has published a five-part framework — access, affordability, accountability, local flexibility, and evidence-based standards — for evaluating whether the proposed rule truly serves children and families. NHSA notes that programs remain open and unaffected during the comment period, which runs through October 6, 2026.

Source: [NHSA, “Fewer Rules Cannot Mean Fewer Results,” Aug. 6, 2026](#)

- NHSA, in partnership with Head Start parents, launched a **parent and caregiver sign-on letter open through September 30**, asking the administration to preserve seven protections: health, vision, hearing, dental, and

developmental screenings; staffing ratios; early identification and support for children with disabilities; bilingual family communication alongside English-language instruction; safe enrollment pathways for families experiencing homelessness, fleeing abuse, or without easy access to paperwork; real decision-making power for parents through the Policy Council and Parent Committees; and career-pathway and coaching supports that help parents move into credentialed roles.

Source: [NHSA, “How Parents and Caregivers Can Protect Head Start Standards” — sign the letter \(English letter | Spanish letter\)](#), accessed Sept. 21, 2026

SBA Office of Advocacy

The U.S. Small Business Administration's Office of Advocacy issued a **September 16 notice** on the broader NPRM, noting that ACF's proposal aims to reduce federal regulations, defer to state policies, and return local control to Head Start agencies. The office flags that small nonprofits and local government entities operating Head Start and child care services may face economic impacts from the rule, and is encouraging affected small organizations to submit comments before the October 6 deadline.

Source: [SBA Office of Advocacy, “ACF Proposes to Reduce Federal Burden for Head Start Programs,” Sept. 16, 2026](#)

SchoolHouse Connection

SchoolHouse Connection's analysis focuses on the proposed rule's effect on children experiencing homelessness. It finds the rule would eliminate the regulations that carry out three Head Start Act requirements: identifying and prioritizing enrollment for children experiencing homelessness, allowing families to enroll while required documents are still being obtained, and coordinating with school-district McKinney-Vento liaisons. The organization has published a side-by-side comparison of the statute, the current regulation, and the proposed rule.

Source: [SchoolHouse Connection analysis, Aug. 10, 2026](#)

A **September 17 NPR feature**, “Head Start proposal could cut out homeless kids,” drew on SchoolHouse Connection's analysis and quoted Executive Director Barbara Duffield warning that the proposal would reduce homeless children's enrollment by eliminating Head Start's ability to reserve enrollment slots and requiring documentation of homelessness rather than allowing families to self-declare.

Source: [NPR, “Head Start proposal could cut out homeless kids,” Sept. 17, 2026](#)

Start Early

Start Early formally opposes the proposal, citing risks to multilingual family services, administrative funding, disability supports, evidence-based staffing ratios, and parent/family engagement requirements. Start Early is coordinating advocacy through its “Together for Head Start” coalition and is hosting a disability-focused webinar on September 23 (see Upcoming Opportunities).

“Head Start has never been only an early education program. Its strength comes from bringing together early learning, health, nutrition and family engagement to support the whole child and the whole family.”
— Celena Sarillo, President, Start Early

Source: [Start Early opposition statement, Aug. 6, 2026](#)

TIME / Georgetown Center on Poverty and Inequality

In a TIME op-ed, Peter Edelman and Lelaine Bigelow of Georgetown's Center on Poverty and Inequality argue the proposed changes repeat the failed logic of 1996 welfare reform — removing people from assistance rather than reducing poverty. They note Head Start has served more than 40 million children since its creation, and point to

TANF's collapse from covering 68 of every 100 families in poverty in 1996 to just 21 of every 100 by 2023 as a cautionary parallel. The authors call for a “cash and care” approach rather than dismantling proven supports.

"The lesson of the last 30 years is that we can't balance budgets on the backs of poor children."

— Peter Edelman & Lelaine Bigelow, Georgetown Center on Poverty and Inequality

Source: TIME, “Trump's Head Start Overhaul Borrows a Playbook That Already Failed,” Sept. 1, 2026

Turtle Talk (Michigan State University College of Law)

Legal analysis from Turtle Talk, a blog supported by Michigan State University's Indigenous Law and Policy Center, examined the public comment record on the broader NPRM. Only 46 of the 9,200+ comments filed so far on the proposed Head Start rule address Tribal concerns and these 46 comments could not be verified from the public record as having been submitted by a Tribe, Tribal organization, or Tribal Head Start. The analysis notes the proposed changes would fall particularly hard on Tribal Head Start programs, and flags a gap between the scale of the potential impact and the level of Tribal input reflected in the record so far. ACF held its Tribal Consultation session on September 16, 2026 to gather additional input.

"The publicly visible docket contained other people's descriptions of Tribal interests, but no identifiable submission from the Tribal governments and providers that operate the affected programs."

— Wenona Singel, Turtle Talk

Source: Turtle Talk, “What the Record Shows”, Sept. 8, 2026

Also on Record

These partners' positions haven't changed since their original statement. We'll move an organization back to a full entry the next time it publishes something new.

- **Center for American Progress (CAP)** — Urges HHS to revoke the wage/benefit rescission (ACF-2026-0364) and reinstate the 2024 standards; argues low pay, not the standards, drives staff turnover. Source: CAP Public Comment on ACF-2026-0364, June 11, 2026.
- **Children's Equity Project (CEP)** — “Lowering the Bar” report finds replacing federal standards with state licensing would weaken early learning quality and consistency nationwide. Source: “Lowering the Bar” report, Aug. 2026.
- **Civil Rights and Disability Organizations** (Children's Defense Fund, EdTrust, Legal Defense Fund, NAACP, National Center for Learning Disabilities, National Urban League, The Arc, UnidosUS) — Joint statement warns the rule would enable discriminatory enrollment and roll back protections against corporal punishment, seclusion, and expulsion; calls for withdrawal. Source: Joint Statement (EdTrust), Aug. 6, 2026.
- **CLASP, CAP, National Women's Law Center & NAEYC** (100+ org coalition) — Sign-on letter urging ACF to maintain the 2024 wage/benefit standards and abandon the rescission. Source: CLASP Coalition Sign-On Letter, June 11, 2026.
- **First Focus on Children** — Joan Lombardi's “A Wake-Up Call for the Country” argues the changes threaten decades of progress via larger classrooms, reduced hours, and cuts to health and disability services. Source: First Focus on Children, Aug. 20, 2026.
- **National Association for the Education of Young Children (NAEYC)** — Opposes the proposal, warning it would eliminate ratio, group-size, and staff-qualification standards; offering member resources for comment submission. Source: NAEYC Statement, Aug. 6, 2026.

- **National Association for Family Child Care (NAFCC)** — Urges preserving core standards while streamlining collaboratively; warns state licensing rules weren't built for Head Start's two-generation model. [Source: NAFCC statement, Aug. 6, 2026.](#)
- **National Institute for Early Education Research (NIEER)** — Steven Barnett's statement and "Race to the Bottom" analysis warn of an 80% standards cut and find only 12 states currently meet Head Start's staffing ratios. [Source: Barnett statement, Aug. 6, 2026](#) | ["Race to the Bottom," Aug. 7, 2026.](#)
- **Prevent Blindness** — Warns loosened vision-screening requirements risk inconsistent screening for the 21.4% of preschoolers with a vision disorder; urges passage of the bipartisan EDVI Act. [Source: Prevent Blindness statement, Aug. 11, 2026.](#)
- **Southern Education Foundation (SEF)** — Opposes the wage/benefit rescission, warning Southern and rural communities — already lagging \$20,000/year in educator wages — would be hit hardest. [Source: SEF Comment to HHS, June 10, 2026.](#)
- **ZERO TO THREE** — Warns rollbacks would especially harm infants and toddlers via lost prenatal/postpartum care requirements and mental health supports in Early Head Start. [Source: "Early Childhood Leaders Sound the Alarm: Babies Can't Afford Weaker Head Start Standards," Aug. 6, 2026.](#)

ACTIONS YOU AND YOUR ORGANIZATION CAN TAKE

1. Submit a public comment by October 6, 2026. Comments don't require policy expertise — the most effective ones are personal, explaining why strong Head Start standards matter to you, your family, your work, or your community. Submit directly at [regulations.gov](https://www.regulations.gov) (Docket ACF-2026-0595), or use Start Early's step-by-step guide and customizable template.

Source: [Start Early's comment guide & template](#)

2. Sign NHTS's parent and caregiver letter by September 30, 2026. Head Start parents and NHTS co-wrote a letter asking the government to protect seven areas of the standards — screenings, staffing ratios, disability supports, bilingual family communication, safe enrollment for families experiencing homelessness, real parent decision-making power, and career pathways for parent staff. Available in English and Spanish; your email address won't be included on the letter.

Source: [Sign the letter](#) ([English text](#) | [Spanish text](#))

3. Write a letter to the editor. Use MomsRising's letter-to-the-editor tool to reach your local paper and call on Congress to protect Head Start.

Source: [MomsRising letter-to-the-editor tool](#)

4. Review talking points before you speak or write. NHTS's NPRM resource hub includes a talking-points document and five issue briefs (NPRM summary; children with disabilities; comprehensive health services; dual language learners; suspension and expulsion) to help keep messaging consistent across our field.

Source: [NHTS NPRM Resource Hub](#)

5. Spread the word inside your own network. Share partner statements and advocacy resources with colleagues, families, and community partners. Share your own Head Start story through MomsRising's story tool, and consider liking/sharing ZERO TO THREE's statement on LinkedIn.

Source: [MomsRising — share your Head Start story](#) | [ZERO TO THREE statement, LinkedIn](#)

6. Join a coalition. Start Early is coordinating advocacy through its “Together for Head Start” coalition; sign-on opportunities like the CLASP/CAP/NWLC/NAEYC letter may reopen for this next round of rulemaking — worth watching partner channels for.

Source: [Start Early — Together for Head Start](#)

7. Amplify Tribal voices. Only 46 of the 9,200+ comments filed so far on the proposed Head Start rule address Tribal concerns — and none are verified as coming from Tribal governments or providers themselves, according to legal analysis from Michigan State's Turtle Talk blog. If you have connections to Tribal Head Start programs or leaders, encourage them to submit written comments before October 6.

Source: [Turtle Talk, “What the Record Shows” \(Sept. 8, 2026\)](#)

UPCOMING AND ARCHIVED OPPORTUNITIES

As of September 22, 2026. Check back closer to the October 6 comment deadline — organizations are adding sessions as the NPRM review continues.

Upcoming

- **Start Early** — “What the Proposed Head Start Changes Could Mean for Young Children with Disabilities” — **Sept. 23, 2026, 3:00–4:00 PM ET**. Families, program leaders, and disability experts on what's at stake if disability-focused standards (screening, inclusion, family support, IDEA coordination, transportation, exclusion protections) are removed, plus a disability-focused comment template. [Register](#)

Archived recordings

- **NHSA** — Head Start Act 201: Comparing the Head Start Act to the Performance Standards — July 30, 2026. [Recordings](#)
- **NHSA** — NHSA's Strategy, Principles, and Big Picture Around the NPRM — Aug. 6, 2026. [Recordings](#)
- **NHSA** — Making Sense of the Notice of Proposed Rulemaking (NPRM) — Aug. 12, 2026. [Recordings](#)
- **Start Early** — Protect Head Start: Make Your Voice Count During the Public Comment Period — Aug. 12, 2026. [Recordings](#)
- **Start Early** — What the Proposed Changes to Head Start Could Mean in Practice, and How to Respond — Sept. 9, 2026. [Recordings](#)
- **Office of Head Start** — Virtual Tribal Consultation on the proposed rule — Sept. 16, 2026. [Recap: Turtle Talk](#)

No confirmed upcoming webinar dates were found (as of this writing) from CLASP, NAEYC, MomsRising, NIEER, NAFCC, ZERO TO THREE, the Children's Equity Project, CAP, or SEF.

RESOURCES

- [NHSA NPRM Resource Hub](#) — talking points, five issue briefs, and recorded webinars on the Head Start Act and the proposed rule.
- [NHSA Parent Sign-On Letter](#) — sign by September 30 (English and Spanish available).
- [Children's Equity Project, “Lowering the Bar” report](#) — analysis of state licensing vs. Head Start standards.

- [NIEER, “Race to the Bottom”](#) — state-by-state ratio comparison data.
- [SchoolHouse Connection homelessness-protections comparison](#) — side-by-side chart of statute, current rule, and proposed rule.
- [MomsRising letter-to-the-editor tool](#) and [share-your-story tool](#).
- [Start Early comment-writing guide & template](#).
- [First Five Years Fund, FAQ: 2026 Head Start NPRM](#) — plain-language explainer on what would change, what stays the same, and what's statute vs. regulation.
- [First Five Years Fund, Public Comment How-To Guide](#) — comment template and Regulations.gov walkthrough (new Sept. 10).

Official documents:

- [HHS/ACF press release](#)
- [Federal Register notice](#) (Aug. 7, 2026 NPRM, ACF-2026-0595)
- [HHS Office of Head Start Information Memo on enrollment reductions](#) (ACF-OHS-IM-26-01)