



Head Start Under Threat: What the Field is Saying

A summary of partner statements, resources, and actions

Compiled August 14 – September 8, 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, HHS's Administration for Children and Families (ACF) published a narrower proposed rule, "Restoring Flexibility To Support Head Start Program Access" (Docket ACF-2026-0364; RIN 0970-AD21), which would rescind the 2024 final rule's wage and benefit requirements for Head Start staff. Its comment period closed June 11, 2026. The Center for American Progress, the Southern Education Foundation, and a coalition led by CLASP, CAP, the National Women's Law Center, and NAEYC (joined by more than 100 national, state, and local organizations) all submitted comments opposing the rescission.

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.

→ → Updated September 8

Comments from Turtle Talk, a leading legal blog focused on **Indian law and legal issues affecting Indigenous peoples and tribal nations** in the United States.

If you have connections to Tribal Head Start programs or leaders, make sure they know about the Office of Head Start's Tribal consultation: a signed authorization letter to speak is due September 11, and the consultation itself is September 16, 2026. [Turtle Talk, "What the Record Shows."](#)

Center for American Progress (CAP)

In a formal comment on the wage/benefit rescission rule (ACF-2026-0364), CAP urges HHS to revoke the 2025 rule, reinstate the 2024 rule, and work with Congress on sufficient funding, fair compensation for Head Start staff, and protecting existing quality standards. CAP notes Head Start lead teachers earn an average of \$30,000–\$40,000 a year — often far less than similarly credentialed public school kindergarten teachers (\$63,000 average) — and argues low pay, not the 2024 standards, is the true driver of staff turnover and classroom closures.

Source: [CAP Public Comment on ACF-2026-0364](#), June 11, 2026

Children's Equity Project (CEP)

CEP's report, "Lowering the Bar," examines how replacing Head Start's federal standards with state child care licensing requirements would weaken early learning quality and consistency for children nationwide.

Source: ["Lowering the Bar" report](#), Aug. 2026

Civil Rights and Disability Organizations (joint statement)

Eight national civil rights and disability organizations — Children's Defense Fund, EdTrust, Legal Defense Fund, NAACP, National Center for Learning Disabilities, National Urban League, The Arc, and UnidosUS — issued a joint statement opposing the proposed rule, arguing it would enable discriminatory enrollment practices and roll back protections against corporal punishment, seclusion, and expulsion. The statement emphasizes the demographic makeup of who Head Start serves — roughly 29% Black children, 40% Latino children, and 15% children with disabilities, by the coalition's count — and warns proposed removals include teacher training requirements, class size limits, bilingual education support, and medical/dental screenings. The organizations are urging the administration to withdraw the proposal and calling on Congress to intervene.

"Head Start will exist in name only, offering unequal services based on where the child lives." — Joint statement

Source: [Civil Rights and Disability Organizations' Joint Statement in Opposition to Administration Efforts to Dismantle Head Start \(EdTrust\)](#), Aug. 6, 2026

CLASP, CAP, National Women's Law Center & NAEYC (coalition sign-on letter)

More than 100 national, state, and local organizations — including AFT, the American Academy of Pediatrics, Children's Defense Fund, MomsRising, NAFCC, the National Education Association, SEIU, YWCA USA, and ZERO TO THREE — jointly urged the Office of Head Start to maintain the 2024 Head Start Final Rule and abandon the proposed wage/benefit rescission, citing high staff turnover, underenrollment, and the risk of classroom closures.

Source: [CLASP/CAP/NWLC/NAEYC Head Start Sign-On Letter](#), June 11, 2026

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

First Focus on Children

In a commentary titled “A Wake-Up Call for the Country,” early childhood policy expert Joan Lombardi argues the proposed changes threaten decades of progress for children, citing larger classrooms with fewer teachers, reduced program hours, devaluation of home language and culture, permitted student expulsion, and cuts to health, mental health, dental, and disability services. Lombardi writes that the administration is “moving in the wrong direction.”

Source: [First Focus on Children, “A Wake-Up Call for the Country”](#), Aug. 20, 2026

MomsRising

MomsRising is running a call-in campaign asking members of Congress to urge HHS to rescind the proposed rule changes, alongside a letter-to-the-editor tool and a social media toolkit. 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: [Call Congress / submit a letter to the editor](#) | [Social media toolkit](#)

National Association for the Education of Young Children (NAEYC)

NAEYC opposes the Administration's proposal, warning it would eliminate core Head Start Program Performance Standards for health, safety, and quality — specifically removing protections governing staff-to-child ratios, group size, and staff qualifications. The organization notes Head Start has served more than 40 million children over 60+ years and currently serves roughly 700,000 children annually, and says it will provide resources to help educators submit comments during the 60-day comment period.

“This proposal crosses that line, removing critical standards such as those governing staff-to-child ratios, group size, and staff qualifications that exist because they support higher quality environments for children, and for their educators.” — NAEYC

Source: [NAEYC Statement on the Proposed Head Start Rule](#), Aug. 6, 2026

National Association for Family Child Care (NAFCC)

NAFCC's statement urges the administration to preserve the core Head Start Program Performance Standards while streamlining regulations collaboratively where appropriate. NAFCC notes nearly 10% of its members partner with Head Start, and warns that replacing federal standards with varying state licensing rules — which were never designed for Head Start's comprehensive, two-generation model — would create inconsistent experiences for children depending on their state.

Source: [NAFCC statement](#), Aug. 6, 2026

National Head Start Association (NHTA)

- NHTA'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: [NHTA, "More Powerful Than We Thought" research brief](#), Aug. 2026

- In an August 25 statement, NHTA 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 NHTA 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. "The question is whether these changes give programs more ability to deliver — or simply ask them to deliver more with less."

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

- NHTA 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. Executive Director Yasmina Vinci said "fewer rules cannot mean fewer results," stressing that Head Start's promise to families shouldn't vary by community. NHTA notes that programs remain open and unaffected during the comment period, which runs through October 6, 2026.

Source: [NHTA, "Fewer Rules Cannot Mean Fewer Results,"](#) Aug. 6, 2026

National Institute for Early Education Research (NIEER)

NIEER Director Steven Barnett's statement warns the broader proposal would eliminate roughly 80% of Head Start standards — including staffing ratios — could cut required daily instruction to just three hours for 128 days a year, and would newly mandate English-only instruction despite research favoring dual-language learning. A companion NIEER analysis found only a handful of states currently meet Head Start's staffing ratios (just 12 states, or 24%, meet the 1:4 ratio for one- and two-year-olds), and that nine states — including Mississippi, Louisiana, Georgia, and Texas — would see toddler-to-staff ratios more than double if the rule defaults to state minimums.

Source: [Statement by Steven Barnett](#), Aug. 6, 2026 | ["Race to the Bottom" ratio analysis](#), Aug. 7, 2026

Prevent Blindness

Prevent Blindness warns that loosening federal vision-screening requirements risks inconsistent, less rigorous screening — noting an estimated 21.4% of Head Start preschoolers have a vision disorder — and is urging Congress to pass the bipartisan Early Detection of Vision Impairments for Children (EDVI) Act alongside opposition comments on the proposed rule.

“Every child in Head Start should have access to timely, effective vision screening and appropriate follow-up so that vision problems can be identified and treated before they lead to permanent vision loss.” — Prevent Blindness

Source: [Prevent Blindness statement on the proposed Head Start rule](#), Aug. 11, 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

Southern Education Foundation (SEF)

SEF opposes rescinding the 2024 wage and benefit standards, warning that Southern and rural communities — where early educator wages already lag national averages by roughly \$20,000 a year — would be hit hardest. SEF argues compensation and program access are not competing priorities, and that removing federal wage floors would deepen existing staffing shortages rather than solve them.

Source: [SEF Comment to HHS on ACF-2026-0364](#), June 10, 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.

“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 has scheduled a Tribal Consultation session for September 16, 2026 to gather additional input, and a signed authorization letter to speak is due September 11.

“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

ZERO TO THREE

ZERO TO THREE's statement warns the rollbacks would be especially damaging for infants and toddlers, citing the potential elimination of prenatal and postpartum care requirements in Early Head Start and the loss of mental health support services. The organization has offered leadership and Head Start families for media inquiries and is asking supporters to like and share its statement.

“Head Start's guiding standards are foundational to what makes these programs so effective. Rolling them back would undermine decades of progress.”

— Melissa Boteach, Chief Policy Officer, ZERO TO THREE

Source: [ZERO TO THREE statement](#), Aug. 6, 2026 | [Share on LinkedIn](#)

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. Call Congress.** Use MomsRising's call-in line to ask your member of Congress to call on HHS to rescind the proposed rule changes.

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

- 3. Review talking points before you speak or write.** NHSA'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: [NHSA NPRM Resource Hub](#)

- 4. Spread the word inside your own network.** Share partner statements and advocacy resources with colleagues, families, and community partners. Use MomsRising's social media toolkit, and consider liking/sharing ZERO TO THREE's statement on LinkedIn.

Source: [MomsRising social media toolkit](#) | [ZERO TO THREE LinkedIn post](#)

- 5. 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 — spread the word / coalition resources](#)

- 6. 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, make sure they know about the Office of Head Start's Tribal consultation: a signed authorization letter to speak is due September 11, and the consultation itself is September 16, 2026.

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

UPCOMING AND ARCHIVED OPPORTUNITIES

As of September 8, 2026. Check back closer to the October 6 comment deadline — organizations are adding sessions as the NPRM review continues.

Upcoming

- **September 9, 2026, 2:00–3:00 PM CT / 3:00–4:00 PM ET** — “What the Proposed Changes to Head Start Could Mean in Practice, and How to Respond,” hosted by Start Early as part of the Together for Head Start coalition. Covers key proposed changes and what they could mean for programs, children, and families, plus practical tools and templates for submitting a federal public comment before the October 6 deadline.

Source: [Register](#)

- **September 16, 2026, 1:00–4:00 PM ET** — Virtual Tribal consultation on the proposed rule, hosted by the Office of Head Start. Open to Tribal governments and Tribal Head Start providers; a signed letter authorizing a representative to speak is due September 11. (Not a general-public registration — but worth flagging to any Tribal program contacts in your network.)

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

Archived (recordings available)

- **NHSA — three-part NPRM webinar series:** “Head Start Act 201: Comparing the Head Start Act to the Head Start Program Performance Standards” (July 30); “NHSA's Strategy, Principles, and Big Picture Around the Upcoming NPRM” (August 6); “Making Sense of the Notice of Proposed Rulemaking (NPRM)” (August 12).

Source: [Recordings \(YouTube playlist\)](#)

- **Start Early — “Together for Head Start: A Webinar Series for Champions and Changemakers.”** Ongoing since October 2025 (16 episodes to date). Most recent: “Protect Head Start: Make Your Voice Count During the Public Comment Period” (August 12), focused on submitting an effective public comment.

Source: [Series page with all recordings](#)

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.
- [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 social media toolkit](#) (Google Doc).
- [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.
- **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 \(ACF-OHS-IM-26-01\)](#)