Illinois Early Learning Council Federal Ad Hoc Committee on Federal Resources and Programs

August 13, 2026

Agenda

- Welcome
- Federal Budget Continuing Resolution

    Sinthu Ramalingam, IDEC

- Head Start Notice of Proposed Rulemaking (NPRM)

    Changes to Current HS Rule

    Nadia Gronkowski, Start Early

    Implications to Illinois Families and Providers

    Lori Morrison Frichtl, IL Head Start Association

- Discussion
- Public Comment
- Next Steps

Federal Budget Continuing Resolution

- On August 8, the Senate passed, by bipartisan vote of 90 – 6, a Continuing Resolution (CR) to extend federal funding beyond the end of the current fiscal year on September 30, 2026, and instead fund the federal government through December 11, 2026.

- The House of Representatives still needs to pass the Senate version of the bill.

Champions for Early Learning

August 13, 2026

HHS NPRM: “Reducing Federal Burden for Head Start Programs”

Nadia Gronkowski
Start Early

The Head Start Program Performance Standards

The operating manual for running a Head Start program. They ensure every child — wherever they're served — receives essential services.

Program governance

Parent Policy Councils, boards, oversight

Program operations

ERSEA, teaching, curriculum, credentials, ratios/group size

Federal oversight

DRS, Full Enrollment Initiative

Fiscal management

Financial controls and accountability

Family engagement

Partnerships with families

Comprehensive services

Screenings, health, nutrition, mental health

Services for children with disabilities

Inclusion, supports, IEP coordination

Multilingual learners

Dual language and languages used in service delivery

Background: The HHS proposal and the Head Start Act

- **Rescinds over 90% of the current standards** and replaces with approximately a dozen pages.
- **The standards themselves and the cost estimate reflect a significant reduction in services, larger class sizes, and fewer staff**, although HHS frames the changes as flexibility and suggests that statutory requirements preserve elements of the program.
- **The Head Start Act relies on the standards** to define quality and services–- and to modify requirements as science evolve. Many content areas in the standards are mandated by the statute.
- **Many requirements and implementation procedures live in the standards**, even if the services are referenced in statute.
- The Head Start Act **prohibits reductions to the quality, scope, or type of services.**

NPRM Overview: Key Takeaways

1 Most Head Start Standards are Eliminated

- Eliminates most of the Head Start standards, including eliminating mention of standards related to health, mental health, oral health, and developmental screenings.

- Most teaching and learning standards have been removed.

2 Weakens Policy Council and Parent Role

- Removes impasse procedures for disagreements between the majority-parent Policy Council and the Governing Board (current rules require third-party mediation)

- The Head Start Act still requires Policy Council approval of major decisions, but the proposal removes the resolution process without replacing it, leaving disputes no mandated path to resolution

- Parent committees become optional

3 Comprehensive Services Significantly Weakened

- Removes most mentions of health and mental health, dental care, and developmental screenings. Programs need to provide these services only as required by the Head Start Act.

- Eliminates the requirement to provide a developmental screening within 45 days of enrollment. The proposal also removes requirements to track follow-up care.

4 All Instruction Must Be in English

- A new requirement states that all instruction for children must be conducted in English, with an exception for Tribal grantees that are including Tribal languages as part of their heritage.

- The proposed rule removes standards for serving dual language learners.

5 Reduction in the Administrative Cap

- Changes the administrative cap from 15% to 5%.

- Under the proposal, programs can apply for a waiver from the new 5% limit, provided it is approved by OHS.

NPRM Overview: Key Takeaways

6 Additional Services for Children with Disabilities Removed

- Eliminates requirements that children with disabilities receive services that allow them to fully participate in all aspects of the Head Start program.

- Requires Head Start programs to follow applicable federal and state statutes in providing services to children with disabilities.

7 Suspension and Expulsion Prohibitions Removed

- Eliminates prohibitions on suspending or expelling children from the Head Start program.

- HHS indicates that programs should adhere to local and state licensing requirements and their own approach to discipline.

8 Head Start Ratios and Group Size Requirements Eliminated

- Eliminates the Head Start specific ratios and group sizes and instead instructs Head Start programs to follow the child care licensing requirements in their state.

- This applies to programs regardless of whether or not they are required to be licensed by their state.

9 New Hiring Considerations for Staff

- 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 can only be obtained through this pathway.

- Statutory education requirements for certain Head Start positions would remain.

10 Nutrition and Physical Activity Requirements

- Adds requirements to provide "nutrient dense whole foods” and provide at least 30 minutes of physical activity per four hours of programming, with a preference for outside activities.

- Requires programs to talk with parents about healthy eating, physical activity, and preparing healthy meals.

Claims of cost savings will come at the expense of quality and services

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**

NPRM Overview: Impact on Programs

FUNDING

Head Start's per-child cost is higher than other early childhood programs because of the breadth and quality of services. Lower standards could be paired with an expectation to serve more children at a lower cost per child.

NEW GRANT RECIPIENTS

Relaxed standards open the door to new grant recipients who previously could not meet quality standards or provide comprehensive services. The delayed funding application may be timed to follow this rule.

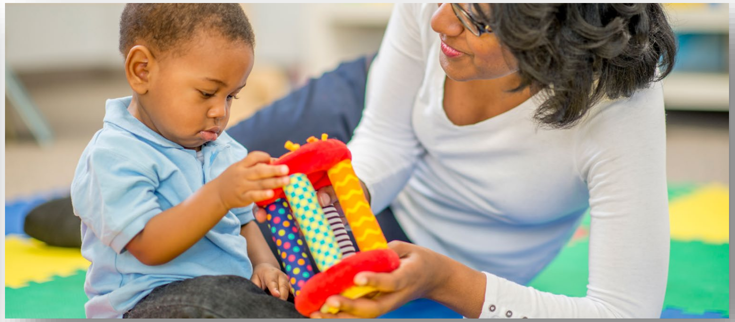
UNCERTAIN FLEXIBILITY IN PRACTICE

Even if standards are loosened on paper, it's unclear how much flexibility grantees will have.

NPRM Overview: Impact on Families

COMPREHENSIVE FAMILY SERVICES

Families would have fewer opportunities to access all the supports that have been a part of the Head Start program; like family partnerships, health and development services, mental health supports and community connections.



INDIVIDUALIZED SUPPORTS FOR CHILDREN

If the requirements change, programs are going to have fewer resources to keep children safe, to offer supports for children with disabilities and to communicate in a family's home language.

FAMILY VOICE AND PARTNERSHIPS

Families have long been a partner to ensure parent representation. The family engagement model and parent voice in governance is at risk.

NPRM Overview: History, Timeline + Where We Are Now

NPRM is titled "Reducing Federal Burden for Head Start Programs"

Notice of Proposed Rulemaking

A formal notice from a federal agency announcing a proposed change to its rules. The public — including grantees, parents, and advocates — has a defined window to submit written comments before the rule is finalized.

1. **OMB review**
   Visible on the public dashboard until review concludes.
2. **Published in the Federal Register**
   NPRM officially published on August 7
3. **60-day public comment period (comments due Oct. 6)**
   Anyone can submit written comments. These create the legal record.
4. **Final rule issued**
   HHS reviews comments, may revise, then publishes the final rule.

Impacts of the Notice of Proposed Rulemaking

Reducing Federal Burden for Head Start Programs

What the analysis says. What it means for Illinois children, families, communities and the Head Start workforce.

IHSA Illinois Head Start Association

Overview of Impact

The Regulatory Impact Analysis identifies the practical consequences of the proposed changes.

16% Increase in average children per teacher

8% Children who may become ineligible

13% Potential reduction in required teachers

6% Potential salary reduction for management positions

2/3rds Administrative-cost reduction sought

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1. Larger Classes. Fewer Teachers.

The rule would increase class size and reduce the teacher workforce.

> *"the increase in the average number of children per teacher would be approximately 16 percent."*
>
> Regulatory Impact Analysis

> *"After taking a sum of the number of teachers required in each age range for each state and territory, we applied a reduction of approximately 13 percent."*
>
> Regulatory Impact Analysis

2. Lower Compensation for Head Start Leaders

The rule would lower wages for Head Start educators and management.

> *"To estimate the potential reduction in compensation, the analysis first determines a potential "floor salary" for each position by applying a percentage reduction to the current average salary for that position."*
>
> **Regulatory Impact Analysis**

> *"a six percent reduction is applied to current average salaries for Head Start management positions to estimate the potential floor salary."*
>
> **Regulatory Impact Analysis**

3. Eligibility Barriers for Families Who Need Head Start Most

The rule could make approximately 8% of currently enrolled children ineligible—unless families can produce alternative documentation.

“Therefore, under the proposed policy changes, we can extrapolate that approximately eight percent of children may currently be enrolled in Head Start that would otherwise no longer be eligible for enrollment under this proposed policy change, unless their family can submit alternative acceptable documentation to demonstrate they meet an allowable eligibility criterion.”

Regulatory Impact Analysis

“ACF acknowledges that some families, such as those experiencing homelessness, may have a more challenging time providing such documentation.”

Regulatory Impact Analysis

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4. Shorter Days. Fewer Days of Service.

The rule would permit reductions in annual hours and/or days of service.

"These reductions reflect reduced required instructional hours and associated staffing time."

Regulatory Impact Analysis

"The proposed changes to center-based program structure requirements may also result in non-quantifiable costs for some families. To the extent that programs choose to reduce duration – annual hours or days of service – families may need to secure alternative child care arrangements, which could impose additional financial costs or lost work time for families."

Regulatory Impact Analysis

5. Home Visitors, Family Child Care Specialists & Coaches

The rule would reduce or eliminate roles that extend Head Start beyond the classroom.

“We estimate potential reductions in the home visitor workforce … we anticipate programs will likely shorten home visits, increase caseloads, and adjust staffing.”

Regulatory Impact Analysis

“We assume the proposed policy change in this NPRM will result in many programs reducing or eliminating staffing for this role [Family Child Care Child Development Specialist].”

Regulatory Impact Analysis

6. Reduced Language Capacity for Dual Language Learners

The rule would reduce program capacity for DLLs and could eliminate bilingual educator positions.

"ACF acknowledges that reduced language capacity may negatively affect communication with non-English speaking families and weaken family engagement."

Regulatory Impact Analysis

"If roughly one-third of affected teachers [who serve dual-language learners with bilingual instruction] experience employment disruption, rather than retaining, the resulting upfront cost they experience is approximately $139 million."

Regulatory Impact Analysis

7. Fewer Bus Monitors

The rule would remove a layer of support for young children during transportation.

"This proposed regulatory change would reduce costs for programs that currently employ personnel to fulfill the Federal bus monitor requirement. Programs that determine a bus monitor is not necessary under their transportation model may reduce staffing costs associated with these positions."

Regulatory Impact Analysis

"The cost savings identified for programs are tied directly to reducing or eliminating bus monitor positions."

Regulatory Impact Analysis

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8. Administrative Costs: A Standard Few Can Meet

The proposal points to a 5% administrative-cost threshold—while acknowledging how uncommon it is today.

> *"Within Head Start specifically, approximately 3.7 percent of grants currently operate at or below a 5 percent administrative cost threshold, indicating that a small subset of programs are already functioning within this range."*
>
> Regulatory Impact Analysis

The analysis acknowledges

Only about 3.7% of grants currently operate at or below 5%.

That means more than 96% are above that threshold.

A dramatic reduction in administrative spending does not occur in a vacuum.

What programs may face

Less capacity for fiscal management and compliance.

Pressure to absorb essential administrative work elsewhere.

Potential tradeoffs between infrastructure and direct services.

9. Coaching Capacity Would Shrink

The analysis explicitly connects the proposal to fewer staff or contracted personnel providing coaching.

"In this analysis, these changes are operationalized as a reduction in the number of staff or contracted personnel dedicated to coaching-type services, which may result in lower expenditures associated with coach salaries and related fringe benefits."

Regulatory Impact Analysis

The savings are achieved by reducing the people who support quality improvement.

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What the NPRM Regulatory Impact Analysis Tells Us

Across the proposal, the same pattern appears: fewer people, less time, less flexibility, and more burden on families.

WORKFORCE

Fewer teachers, home visitors, coaches, bilingual educators, specialists and bus monitors.

SERVICE

Potentially larger classes, shorter days, fewer days and reduced home-visit capacity.

ACCESS

Documentation requirements could push eligible children out of Head Start.

QUALITY

Reduced language capacity and fewer supports can weaken family engagement and service quality.

FAMILY COST

Families may have to find alternative child care or absorb lost work time.

INFRASTRUCTURE

Programs are asked to reduce administrative costs despite limited evidence that most can reach the proposed level.

From Regulatory Language to Real-World Impact

“16 percent”
More children per teacher.

“6 percent”
Lower salary floor for management.

“13 percent”
Fewer teachers required.

“Reduce staffing costs”
Fewer people doing essential work.

“8 percent”
Families may lose eligibility.

“Reduce duration”
Less service for children and families.

A Stronger Way to Respond

1. Put the numbers in front of decision-makers.
2. Tell the stories behind the numbers.
3. Connect each proposed change to children, families and staff.
4. Ask: Who benefits? Who bears the cost?
5. Protect Head Start by making the real-world impact impossible to ignore.

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Discussion

- What components of the proposed changes do you believe will have the biggest impact to Head Start, Early Head Start, and/or Migrant and Seasonal Head Start providers?

- How do you think these proposed changes will most impact parents/families?

Public Comment

Next Steps

- Next meeting scheduled for: Thursday, September 10th at 11am-12pm
- Calendar invites moving forward will come from Justin Peters or Mackenzie Getz
- Meetings are posted on the IDEC Calendar