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

April 23, 2026

Agenda

1. Welcome
2. Illinois Accountability Commission
    - *Isabella Hurtado, Illinois Governor's Office*
3. Federal Budget Timeline
4. President's Budget Request
5. President's Policy Proposals
6. Federal Bill Update
7. Higher Education Accountability
    - *Mary Harrill, Senior Director, Higher Education, NAEYC*
8. Discussion and Q/A
9. Public Comment
10. Next Steps

Please put your name and organization in the chat

Executive Order 2025-06

On October 23, 2025, Illinois Governor JB Pritzker signed Executive Order 2025-06, which gives executive authority to the formation of the **Illinois Accountability Commission**.

"We are going to show the public — here in Chicago, the State of Illinois, across the nation, and around the world — exactly what is going on. We will create a detailed record, and that record will reflect reality. Once this all ends, I believe there will be people of good faith who will review what the Commission has recorded and will demand answers and accountability." **- Governor JB Pritzker**

ILLINOIS ACCOUNTABILITY COMMISSION

Summary of Work to Date

Charge per EO	Activity/Output
Examine the Impact of Operation Midway Blitz	**Investigated 12 “flashpoint” incidents:** Engaged a team of in-house and pro bono lawyers to develop thorough investigative briefs on 12 flashpoint incidents **Will host five public hearings:** Developed hearings to curate testimony by subject matter experts and witnesses of misconduct during OMB to the Commission in formal hearings **Hosted six listening sessions:** Partnered with CBOs to host listening sessions across the Chicagoland area to hear and record testimony from impacted families and community members **Impact analysis projects:** Engaged third party academic and other subject-matter experts to conduct impact research **Incident research projects + legal analysis:** Partnered with academic legal departments to catalogue incidents, create dashboards and data visualizations by scraping publicly available footage, and provide legal analysis
Create a Public Record	**Collected community testimony, narrative, and videos:** recorded testimony shared at public hearings, field hearings, and submitted through the IAC’s information submission process **Engaged students’ voices:** Engaged CPS students through a dedicated curriculum to submit letters, art, and multimedia reflections **Produced investigative briefs, research, and interviews:** Lawyers produced evidentiary briefs on 12 flashpoint incidents, including interview footage, and research projects yielded findings, data visualizations, and video content from OMB **Developed reports:** Cataloged research, investigations , and IAC activities in two substantial reports **Created Commission Webpage:** Archived information, hearings, and reports digitally
Issue findings and make policy recommendations	**Policy recommendation submission:** Consulted local and national experts for policy recommendations **Evidence recommendations:** Developed recommendations

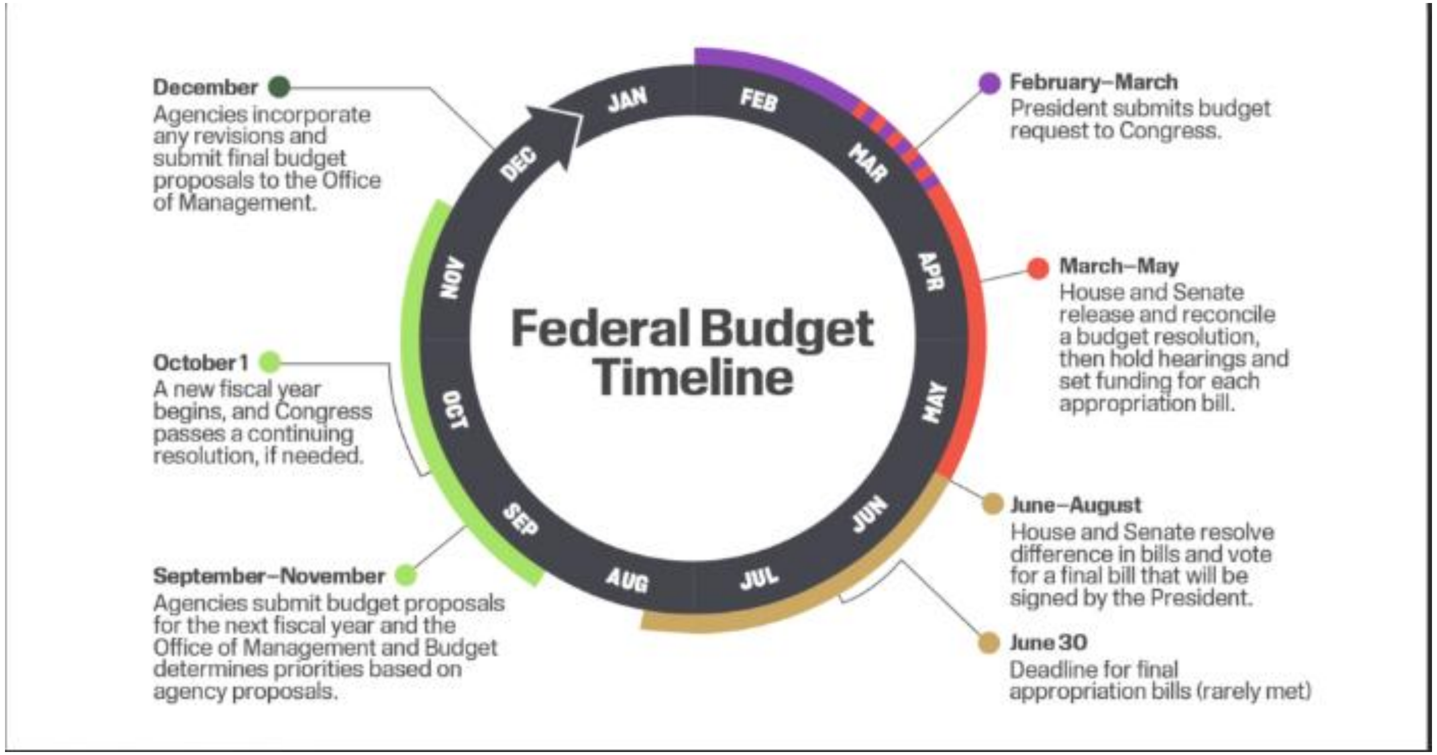
Public Hearings and Listening Sessions

Hearings to Date:

- **Hearing 1 (December 18th)-** focused on firsthand accounts of chemical agents used in residential neighborhoods, with testimony from impacted families, eyewitnesses, and a medical expert regarding the health effects.
- **Hearing 2 (January 30th)-** focused on concerns that federal immigration enforcement during Operation Midway Blitz has become increasingly militarized, opaque, and less accountable.
- **Hearing 3 (February 24th)-** focused on community- and systems-level impacts of federal enforcement actions in Illinois, including Operation Midway Blitz.
- **Hearing 4 and 5 (April 27 and 28)-** focused on new footage from body-worn cameras, high profile witnesses, case reviews
- **Final Meeting (April 30)-** approval of the final report, then presentation to the Governor, referrals to law enforcement

Listening Sessions: worked with community-based organizations to build secure listening sessions to meet people in their neighborhoods + collect anonymous testimony.

1. **Franklin Park**
2. **North Side of Chicago**
3. **South Side of Chicago**
4. **Southwest Side of Chicago**
5. **West Side of Chicago**
6. **Lake County**
7. **Will County**



Federal Budget Timeline

FY27 President's Budget Request

On 4/3/26, the President released his fiscal year (FY27) budget request

The budget includes a modest increase for:

- *Individuals with Disabilities Education Act (IDEA) Part C*

The budget request maintains funding for some major education programs including:

- *Title I*
- *Head Start*
- *Child Care Development Block Grant (CCDBG)*

The budget proposes elimination of some early childhood education programs including:

- *Preschool Development Grant Birth through Five (PDG B-5)*
- *Child Care Access Means Parents in Schools (CCAMPIS)*
- *Community Services Block Grant*

President's Policy Proposals

- Consolidate ESSA Programs
- Consolidate IDEA Programs
- Head Start Standards

Relevant Federal Bills

Child Care Program Integrity

- Senators Cassidy (R-LA) and Tuberville (R-AL), Chairman of the Senate Health, Education, Labor, and Pensions (HELP) Committee, released a discussion draft of a reauthorization bill of CCDBG
- Reauthorization proposes prohibits enrollment-based payments, presumptive eligibility, and timely payments; eligibility is changed from 12 months to 6 months; eligibility requires that parents be citizens rather than the child; lowers the income limit for single mothers; and initiates work requirements for married couples

Recap: Higher Education Provisions included in the Federal Reconciliation Legislation

Graduate Plus program eliminated (this program allowed grad students to borrow up to the cost of attendance)

Do No Harm provision

New aggregated limit established for graduate student Direct Unsubsidized Loans ($100K, previously $138K)

New aggregated limit for professional student Direct Unsubsidized Loans ($50K annually; $200K total)

New limits for Parent Plus Loans -previously parents could borrow up to the cost of attendance

New lifetime maximum limit borrowing through federal student loans - $257K (excludes PLUS)

Institutions can now set loan limits by program of study

Federal loan repayment options are streamlined into two new plans for new borrowers

New provision on Pell Grant Access for “low-earning outcome” programs

Most provisions go into effect July 1, 2026

Recap: What is the Do No Harm Provision?

- One of several higher education provisions amending Title IV of the Higher Education Act that was included in the federal reconciliation legislation passed in Summer 2025.

- It goes into effect July 1, 2026

- Essentially, it requires each program within each institution to demonstrate that its graduates make more than an individual with solely a high school diploma (for undergraduate programs) or with solely a baccalaureate degree (for graduate programs).

- If a program fails this “metric” two out of three years, students can no longer access federal student loans in that program *(with a caveat re: Pell that we’ll discuss later).*

ED Will Use an "Earnings Premium Metric" To Determine Program Performance on the "Do No Harm" provision

Programs will be defined at the 6-digit CIP Code Level and credential level (e.g. certificate, associate degree, baccalaureate degree)

For each program, ED will compile a list of the program completers **(a cohort**) who received Title IV funding for the relevant financial aid year. If the cohort does not have at least 30 completers, ED will aggregate completers from previous years until 30 is reached (ED will also aggregate up CIP Codes).

ED will use IRS data to attain program completers' wages. *(note: it will not include individuals who are in school or unemployed)*

ED will set an **"earnings threshold"** using the American Community Survey (ACS) - an annual, nationally-representative dataset maintained by the US Census Bureau – to set the state/national wage comparison threshold *(note: it will not include individuals in school or unemployed)*

The **earnings premium measure** will compare the cohort's median earnings to the median earnings of adults age 25-34 in the state/or nationally who hold solely a high school diploma or baccalaureate degree (see next slide)

Who will be included in the cohort in Year 1?

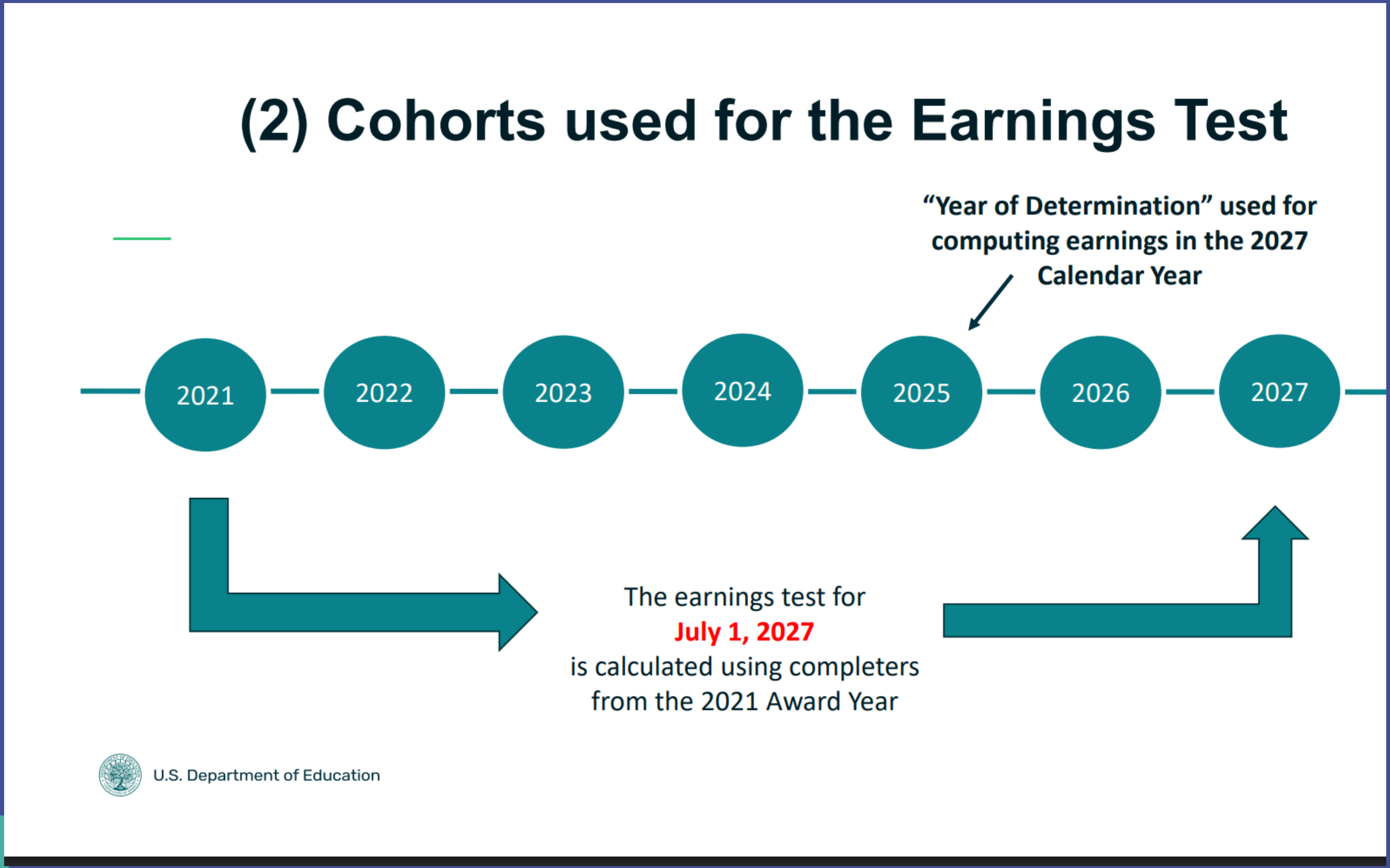


Image Source: U.S. Department of Education Presentation to Negotiated Rulemaking Committee on January 7, 2026

Timeline for Calculations and Cohorts

Summary

Calendar Year	Colleges First Notified	Takes Effect	Completer Cohort Used	Earnings Period Measured	Aggregation Window
2026	N/A	N/A	N/A	N/A	N/A
2027	Early 2027	July 1, 2027	Award Year 2021	Jan. 1, 2025- Dec. 31, 2025	AY2017- AY2020
2028	Early 2028	July 1, 2028	Award Year 2022	Jan. 1, 2026- Dec. 31, 2026	AY2018- AY2021
2029	Early 2029	July 1, 2029	Award Year 2023	Jan. 1, 2027- Dec. 31, 2027	AY2019- AY2022
2030	Early 2030	July 1, 2030	Award Year 2024	Jan. 1, 2028- Dec. 31, 2028	AY2020- AY2023
[...]	[...]	[...]	[...]	[...]	[...]

The first year programs could lose eligibility for Federal student loans.

If cohort aggregation is needed, earnings for prior cohorts are measured at the same interval (the tax year corresponding to four years after that cohort exits).

Image Source: U.S. Department of Education Presentation to Negotiated Rulemaking Committee on January 7, 2026

What happens if a program fails the earnings premium metric?

For the first time during a three-year period

- Institutions must provide warnings to students in programs that failed that they may lose access to federal loans in those programs in subsequent years.
- The institution can appeal ED's determination of a program's performance on the earnings premium metric.
- Institutions have an option to close the program, while allowing (pending ED's approval) currently enrolled students to continue to access federal loans for a period of time.
  - The program (or substantially similar one) cannot be restarted for at least two years after the program closes.

For the second time during a three-year period

- The institution can appeal ED's determination of a program's performance on the earnings premium metric.
- Students will no longer be able to use federal student loans in that program.
- The program is deemed a "low-earning outcome" program
- Institutions are ineligible to apply to re-establish eligibility for the Direct Loan program for the "low-earning outcome" program for two years.

Proposed Regulatory Changes to Pell Eligibility

In order for institutions to participate in Title IV programs they must demonstrate (two out of three consecutive years) that:

a) at least half of their Title IV recipients are not in programs that fail the earnings premium test **AND**

b) at least half of their Title IV revenue is not from programs that fail the earnings premium test.

If an institution fails this metric, then students in "low-earning outcome programs" are not eligible for Pell Grants

The Potential Ripples of the DNH Provision

Direct

- Limit federal student loans to ECE students
- Impact quality of ECE professionals/programs (& impacts to young children & families)
- Increases the data reporting/tracking burdens for institutions of higher education
- Increased transparency for ECE higher ed programs

Indirect

- Undervalues ECE higher ed programs (not worth having due to poor wages)
- Puts undue & unfair pressures/impacts on ECE higher ed programs for a measure ($$/wages) out of their control (i.e., systemic market failure vs. ECE program failure)
- Sends a negative message that...
  - the ECE profession is not worthy of investments/support/consideration of future career choice
  - **quality** in higher ed is all about wages (vs. better health, civic/community engagement, increased life expectancy, job opportunities, stronger problem solving, better relationships, confidence to achieve goals, achievement of professional standards & competencies, etc.)

How can the Higher Education and ECE Higher Ed Communities Respond and Prepare?

What will be the focus of our comments during the public comment period for the draft regulations?

- Elevate that ECE is a high-skill, in high-demand, but low-wage profession. Elevate the potential impact of this provision on ECE higher education pathways and the impact on the quality of child care (and the ECE workforce) in communities.

- Ensure that wage data (both data used to set the comparison threshold and graduates' wage data) is accurate and reflects fair wage comparisons.

- Exempt programs preparing professionals in fields of national need – as defined by the Public Service Loan Forgiveness program – from the low earning outcome provision.

- Extend the enactment of the provision to at least July 1, 2027 (in accordance with ED's Master Calendar requirements.)

Let's Look at ACS and BLS Wage Data in Illinois

Median earnings of all adults with high school diploma	Median earnings of men with a high school diploma	Median earnings of women with a high school diploma	Median earnings of white adults with a high school diploma	Median earnings of black adults with a high school diploma	Median childcare earnings of adults with high school diploma	Median childcare earnings of adults with an associate degree	Median childcare earnings of adults with a baccalaureate degree	Median childcare wages (BLS data)
$35,534	$39,713	$30,827	$36,992	$30,827	$18,885	$30,523	$31,569	$32,860

**Median earnings estimates derived from the U.S. Census Bureau's 2024 ACS 5-year data, unless otherwise indicated*

Resources to Support Responding to DNH

- H.R. 1 Explainer and Resources
- Do No Harm (DNH) Explainer
- NAEYC Comment Guide (forthcoming)
- ECE Higher Ed Huddle on TBD
- Sign-On Letter (forthcoming)

https://www.naeyc.org/our-work/public-policy-advocacy/do-no-harm-provision

It will be important to **individualize** responses and to encourage your students, graduates, advisory committee members, community partners, and local/state advocates to respond.

Comments are due May 20, 2026

Homework

- Find out your program's 6-digit CIP Code
- With IR/financial aid office, for that CIP code and credential level, how many graduates in 2021, 2020, 2019, 2018 used federal student loans? How many in 2022 (looking ahead to Year 2)
- Identify and educate allies (e.g. students, graduates, advisory cmmt members, families)

The Near Term

- Gather and elevate program impact data (e.g. employment rates, meeting workforce shortages, quality of care, economic impact, etc.)
- Gather and elevate all of the ways that the state/institutions are minimizing the cost of ECE degrees
- Identify and leverage institutional leaders (e.g. presidents, provosts, deans, chancellors) who can make the case for ECE with their peers
- If state mirror bills are introduced, ask for an exemption for high-need fields

The Ultimate Fix

- Increase ECE compensation
- Increase funding and advancing policies that mitigate/eliminate degree costs

Thank you and Stay in Touch on This Topic!

Mary Harrill, mharrill@naeyc.org
Erin Speer Smith, espeersmith@naeyc.org

Public Comment

Next Steps

- Our next meeting will be held May 21st from 11-12pm