

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

May 21, 2026

Agenda

- Welcome
- Child Care Development Fund (CCDF) Final Rules
 - *Julie Gilling, Policy Director, IDEC*
- Head Start Workforce Notice of Proposed Rulemaking (NPRM)
 - *Julie Gilling, Policy Director, IDEC*
- CCDF Dear Colleague Letter
 - *Julie Gilling, Policy Director, IDEC*
- Temporary Assistance for Needy Families (TANF) Information Memorandum
 - *Julie Gilling, Policy Director, IDEC*
- Discussion and Q/A
- IDEC Update
 - *Ann Whalen, Assistant Secretary of Education and Care*
- Immigration Resources
- Public Comment
- Next Steps

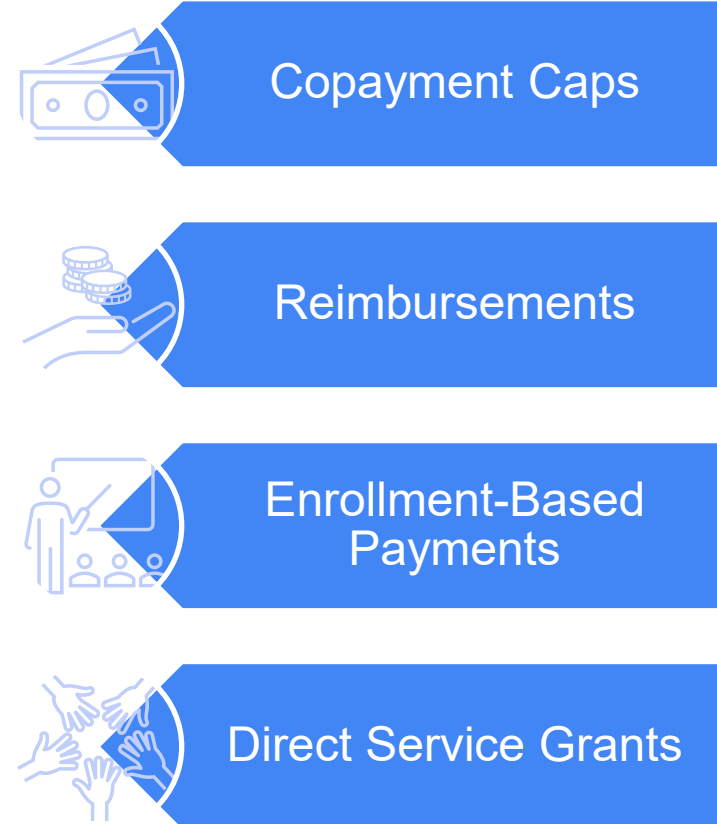
Please put your
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organization in the
chat

Reminder: Child Care Development Fund Notice of Proposed Rulemaking

- On January 5, 2026, the Administration for Children and Families (ACF) published a new Notice of Proposed Rulemaking (NPRM) that would rescind several requirements from a March 2024 final rule for the Child Care Development Fund (CCDF), issued during the Biden Administration.

ACF - Child Care and Development Fund (CCDF) Final Rule

- The U.S. Department of Health and Human Services (HHS) finalized a new rule this month to rescind four major Biden-Era provisions that were put into place in 2024.
- The change is part of the federal government's attempt to lower costs, and to "shift control back to the states."



Child Care and Development (CCDF) Final Rule

Copayment Caps

- The rule repeals mandate that states cap family copayments at 7% of household income. State and territorial agencies can now set their own sliding scale fees.

Reimbursements

- Rolls back requirement to pay providers in advance of services, allowing return to system where subsidies are paid out based on verified attendance.

Enrollment-Based Payments

- Eliminates requirement that states pay providers based on authorized enrollment rather than daily attendance.

Direct Service Grants

- Removes provisions that require states to directly secure child care services through grants or contracts.

Head Start Workforce Notice of Proposed Rulemaking (NPRM)

- On May 12th (last week), the Administration for Children and Families proposed a rule relating to Head Start.
- The proposal removes certain **wage and benefits requirements** that ACF believes don't match what the Head Start Act actually requires and are too costly and prescriptive for programs.
- The theory is that this will give local programs more flexibility and make it easier for families to get high-quality services.
- ACF estimates that removing these requirements would save Head Start programs more than \$2 billion in the future. These changes would roll back some of the most expensive parts of the 2024 Biden-Era rule, *Supporting the Head Start Workforce and Consistent Quality Programming*.

Background on Head Start 2024 Rule

- HHS published a final rule in 2024 that added new wage and benefits requirements to the Head Start Program Performance Standards – a set of rigorous requirements that apply to the operation of all Head Start programs.
- The 2024 rule created, for the first time, legally binding wage and benefits standards for early educators, who are among the lowest paid workers in the country. Specifically, the new requirements included:
 - Pay Parity, Wage Floor, Pay Comparability, Pay Scales, Benefits
- The 2024 rule phased in these new wage and benefit requirements. The rule set a 2028 deadline for the benefits requirements and a 2031 deadline for the wage requirements (i.e., pay parity, wage floor, pay comparability, and pay scale).

EdCounsel Analysis: link to [resource here](#)

Head Start 2024 Rule

Pay Parity	Pay Parity between Head Start educators and preschool teachers in public schools. (Head Start educators include teachers, assistant teachers, family child care providers, and home visitors.)
Wage Floor	Wage floor for all staff that is sufficient to cover basic needs such as food, housing, utilities, medical costs, transportation, and taxes.
Pay Comparability	Pay comparability across ages served, which requires programs to ensure that the wage for educators does not vary by the age of children served for staff positions with similar experience and qualifications.
Pay Scales	Pay scales that incorporate the above and account for responsibilities, qualifications, experience, and schedule or hours worked. (The pay scale must be updated every 5 years.)
Benefits	Benefits for full-time staff, including health care coverage, paid leave, and short-term free or low cost behavioral health services. For part-time staff, Head Start programs must facilitate access to health care coverage. For all staff, Head Start programs must provide resources and information on child care, and, if the staff member is eligible, facilitate access to child care subsidies and public service loan forgiveness (PSLF).

Comment Period for Head Start NPRM

- HHS is accepting comments in response to the NPRM until **11:59pm E.T. on June 11, 2026**. At the conclusion of the comment period, HHS will review and respond to comments and issue a final rule.
- Any person or organization can submit comment
- Find link here: [Regulations.gov](https://www.regulations.gov)


Your Voice in Federal Decision Making

You are commenting on a Proposed Rule by the **Administration of Children and Families**

[Restoring Flexibility to Support Head Start Program Access - RIN 0970-AD21](#)

Write a Comment

[Commenter's Checklist](#)
[Public Comments on Federal Regulations](#) 

Comment*

Start typing comment here...

ACF Dear Colleague Letter - CCDF

- On May 11th, HHS-ACF Assistant Secretary Adams sent a letter to Governors and HHS-ACF OCC Director Horman shared a "Dear Colleague Letter" promoting example of existing “flexibilities” and/or strategies.
- This is non-regulatory guidance and does not change or effect law.



Federal law strongly supports parental choice in child care under CCDF, allowing families to choose the provider type that best meets their needs.



States have significant flexibility to allow family, friend, and neighbor (FFN) caregivers—including care in the child’s own home—to receive CCDF funds, as long as basic requirements are met.



Homeschooling can be treated as a qualifying activity for CCDF eligibility if the state chooses, potentially expanding access for homeschooling families.



States may allow license-exempt providers (not just relatives) to receive CCDF funds if they can demonstrate that the exemption does not endanger children’s health and safety.



Faith-based providers may participate fully in CCDF, including using funds for sectarian activities when care is provided through vouchers, and may maintain religious-based hiring practices.

TANF Informational Memo

- [TANF Informational Memo](#) states that TANF provides broad flexibility to support children cared for in their own homes, encourages states to transfer the maximum amount of TANF funds authorized by law, up to 30%, of TANF block grant to the Child Care and Development Fund (CCDF), clarifies that states may provide TANF assistance to married, two-parent families in which one parent remains home as a caregiver and directs states to examine whether their policies, payment structures, and program materials unintentionally disfavor families with an at-home parent.

Discussion | Q/A

IDEC UPDATE: ON TRACK | RISKS MITIGATED OR ONGOING

	Objectives	Status
Technology Transition	High complexity transition or shared ownership; Active subject matter expert and legal review.	!
Grants Management System	Actively shifting from ISBE and DHS to state preferred system, Euna/Amplifund; Preliminary success but some system slowness	✓
Federal Approval Process	Five impacted programs; 1 request submitted, three will be submitted in May, and 1 will be submitted in Aug (per HHS guidance). Developed a plan to mitigate this risk with DHS and GOMB (i.e., subgrant authority).	!



Illinois Family Support

Social Media Toolkit

Guidance for Times of Heightened ICE Activity



In collaboration with:



Social Media Posts

Carousel Option 1:

Graphic(s)	Caption
	Children look to the adults in their lives for cues on how to navigate fear and uncertainty 🧡 Here are gentle, grounded ways to talk with children about what's happening, without overwhelming them or making false promises. Swipe for simple strategies you can use today. For more child mental health support, visit: 📘 BEACON: beacon.illinois.gov ☎️ Illinois Warm Line: 866-359-7953 <i>Los niños buscan en los adultos de su entorno señales sobre cómo manejar el miedo y la incertidumbre 🧡</i> <i>Aquí tienes formas suaves y realistas de hablar con los niños sobre lo que está ocurriendo, sin abrumarlos ni hacer promesas falsas.</i> Desliza para encontrar estrategias sencillas que puede usar hoy mismo. Para más apoyo en salud mental infantil, visita: 📘 BEACON: beacon.illinois.gov ☎️ Illinois Warm Line: 866-359-7953

Supporting Illinois Families Toolkit

Resources

State Resources

- [DCFS Non-Regulatory Guidance](#) – provided in English and Spanish
- [IllinoisImmigrationInfo.org](#) - a comprehensive website with immigration-related information and guidance.
- [Illinois Care for Kids](#) – Know your Rights page
- ISBE's [Non-Regulatory Guidance](#) on Immigration Enforcement
- ISBE's [Newcomer Resources](#)
- Illinois Coalition for Immigrant and Refugee Rights [website](#)
- Illinois Attorney General [website](#)

Community Resources

- What State Advocates Need to Know Now to Support [Children with Disabilities and their Families](#)
- Webinar today at 2pm: [Empowering Head Start Communities to Support Immigrant Families](#)
- The Resurrection Project - Know Your Rights Volunteer Sign Up [form](#) for Business Canvassing

Resources from the Resurrection Project

- Request a KYR training for your organization [here](#).
- Sign up for a regularly scheduled virtual TRP KYR training [here](#).
- More information at <https://www.illinoisimmigrationinfo.org/know-your-rights>
- Emergency Planning Guides [download here](#).

Moving Forward

- Are there outstanding topics that are of interest to you that you would like to explore in future meetings?

Public Comment

Next Steps

- Our next meeting will be held June 18th from 11-12pm