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Charting the Course: Navigating the Next Era of Head Start

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AGENDA

- **Welcome & Session Framing**
- ***How Did We Get Here?***
- **The 2026 Head Start NPRM**
- **Engaging in the Rulemaking Process**
- **Pair & Share: Innovation in Practice**
- **Innovation & Collaboration:
VA Head Start Leadership Collaborative (HSLC)**
- **Discussion & the Road Ahead**

NCAP Head Start Task Force

Community Action Agency (CAA) Executives and Head Start Directors that advocates for and promotes the synergies that exist between Community Action and the Head Start early childhood education model.



Co-Chairs



Edith White

CEO

Hampton Roads Community Action Program
Newport News, VA



Thelma French

President & CEO

Total Community Action, Inc.
New Orleans, LA

How Did We Get Here?

2020	Pandemic-era waivers, flexibilities & emergency Head Start guidance	April 2025	Head Start associations sue HHS over DEI restrictions, regional office closures & staffing cuts
Nov. 2021	COVID-19 vaccination & masking Interim Final Rule	April 2025	Leaked FY26 budget proposal would eliminate Head Start funding
2021-23	Federal courts enjoin portions of the vaccine & masking rule	July 2025	GAO finds HHS unlawfully withheld Head Start funds in violation of the ICA
Nov. 2023	<i>Supporting the Head Start Workforce and Consistent Quality Programming</i> NPRM	July 2025	HHS reinterprets PRWORA to classify Head Start as a "Federal public benefit"
Aug. 2024	Workforce & Quality HSPPS Final Rule	Sept. 2025	Federal court blocks application of the new PRWORA interpretation to Head Start
Jan. 2025	OMB funding freeze disrupts federal grants, including access to Head Start funds	Jan. 2026	Federal court blocks Head Start DEI restrictions and challenged staffing reductions
March 2025	HHS restricts use of Head Start funds for DEI-related activities	April 2026	President's FY27 Budget signals shift toward state licensing and other state requirements
March 2025	HHS restructuring closes regional offices and reduces federal Head Start staffing	May 2026	Proposed rule would rescind 2024 Head Start wage & benefit requirements
		Aug. 2026	<i>Reducing Federal Burden for Head Start Programs</i> NPRM

NPRM Overview: At-A-Glance



The NPRM would rescind current Parts 1301–1305 entirely and replace them with a streamlined Part 1301 containing substantially fewer federal requirements.

Removal from the Performance Standards does not eliminate an underlying requirement in the Head Start Act or other applicable law.

- Published August 7, 2026
- 60-day public comment period
- Comments due October 6, 2026
- Proposed changes are not currently in effect
- HHS will review public comments before issuing a final rule

NPRM Overview: I

Program Operations, Workforce & Flexibility



- **Administrative cost cap:** Reduces the cap on development and administrative costs from **15% to 5%** of total approved program costs; programs could request a waiver of the new cap.
- **Staff-to-child ratios & group size:** Replaces federal ratios and group-size limits with **applicable state, local, or Tribal** requirements; current federal standards would apply where no such requirements exist.
- **Staff qualifications:** Removes many position-specific federal qualification requirements, while qualification requirements established in the Head Start Act remain in effect.
- **Training & professional development:** Removes detailed federal training and professional-development requirements; programs would remain subject to requirements contained in the Act.
- **Program duration:** Removes the 1,020 annual-hour requirement for Head Start Preschool and the 1,380-hour requirement for Early Head Start center-based services; **statutory minimums remain.**
- **Waiver authority:** Creates broad new authority to waive most remaining Performance Standards, including the administrative cost cap and non-federal match; **eligibility, nutrition, and physical-activity requirements could not be waived.**

NPRM Overview: II

Services, Families & Eligibility



- **Health & developmental services:** Removes many requirements for **screenings, health and dental care, follow-up, referrals, and mental health services**; some underlying requirements remain in the Act.
- **Children with disabilities:** Removes many Head Start-specific requirements for **accommodations, individualized supports, and disability services**; the Act, IDEA, and other applicable laws still apply.
- **Suspension & expulsion:** Removes federal **limits on suspension and the prohibition on expulsion**, shifting discipline policies toward applicable state and local requirements.
- **Family engagement:** Removes many detailed requirements for **family partnership services, parent activities, and community partnerships**; statutory requirements remain.
- **Eligibility documentation:** Eliminates **self-attestation as sufficient documentation of eligibility** and the provision allowing enrollment without documentation of a child's age when unavailable.
- **Housing-cost adjustment:** Eliminates the option to **adjust family income for excessive housing costs** when determining eligibility.

NPRM Overview: III



New Requirements, Oversight & State/Local Authority

- **English-language instruction:** Requires educational services to be conducted in **English** and prioritizes English acquisition; includes an exception for Tribal language preservation.
- **Nutrition:** Adds requirements emphasizing **nutrient-dense whole foods** and limiting added sugars and certain artificial ingredients.
- **Physical activity:** Requires at least **30 minutes of physical activity for every 3½ hours** a child participates in the program, with outdoor activity when weather permits.
- **Healthy marriage:** Requires programs to provide parents with information and education on the **benefits of healthy marriage** as part of family engagement.
- **Federal oversight:** Streamlines current **monitoring and Designation Renewal System** regulations; statutory monitoring and designation requirements remain.
- **State/local authority:** Shifts several areas toward **state, local, or Tribal requirements**, including ratios and group size, transportation, safety practices, and discipline policies.

NPRM Overview: Notable

Notable Issues & Questions



- **Limited rationale for major changes:** Little provision-specific justification beyond broad claims of reducing burden, increasing flexibility, and improving efficiency.



- **Statutory quality floor:** The Act prohibits changes that would reduce the quality, scope, or types of specified Head Start services below the 2007 standards.



- **Statutorily required regulations:** The Act expressly requires regulations in several areas; eliminating those provisions without replacement raises questions about statutory compliance.



- **Shift to subregulatory guidance:** Requirements moved outside the HSPPS may be easier to change without notice-and-comment and could make federal expectations less transparent and predictable.



- **Outsized role for monitoring:** With fewer explicit regulatory standards, monitoring could increasingly determine what programs are expected or permitted to do—including programs choosing to maintain comprehensive services.



- **Greater discretion in enforcement:** Increased discretion across monitoring, waivers, funding decisions, and DRS raises questions about **consistent treatment and safeguards against selective enforcement.**



HEAD START NPRM

Share Your Insights.

Help shape NCAP's response.



ENGAGEMENT TIMELINE



AUGUST 18-19:

Community Action Listening Sessions



AUGUST 21:

NCAP Head Start Task Force Meeting



SEPTEMBER 2:

Head Start Town Hall @ NCAP Annual Convention



WEEK OF SEPTEMBER 21:

Two additional Network sessions to review and discuss our draft comments and positions



SEPTEMBER 25:

Draft comments shared with the Network to inform agencies



OCTOBER 6:

Submission Deadline



WE WANT TO HEAR FROM YOU!

Your input helps ensure our comments reflect the realities and needs of the Community Action Network.



REACTIONS to proposed changes



PERSPECTIVES from your program



RECOMMENDATIONS for our comments

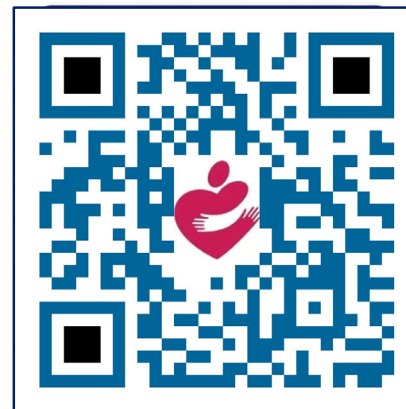


QUESTIONS about the NPRM



RESOURCES that would be helpful

SHARE YOUR INPUT



Scan to access the feedback form

What We Heard

What was your initial reaction when you reviewed or heard about the proposed rule?



Top Areas of Concern

-  **Administrative Cost Cap**
 -  **Staffing Ratios & Group Sizes**
 -  **Staff Qualifications & Professional Development**

What We Heard

Key Takeaways

- Strong concern does not necessarily mean blanket opposition.
- Greater flexibility could also create greater complexity.
- Preserving Head Start as a national, comprehensive program is a major concern.
- Operational impacts are front and center.
- Participants are looking beyond what is removed to what replaces it.

Notable Issues

- Administrative cost cap and indirect costs.
- Statutory protections for Head Start services.
- Monitoring and accountability.
- What remains allowable.
- State variation and national consistency.
- Savings, enrollment, and resources.
- Waivers and implementation flexibility.

Stay Connected

Engage

- **REVIEW** the proposed rule and consider submitting comments based on your program's experience
- **SHARE** questions, feedback, and potential impacts with NCAP and CAPLAW
- **WATCH** for our draft comments and September comment review sessions
- **EXPLORE** additional analysis and resources throughout the comment period
- **CONTACT** NCAP or CAPLAW with questions or additional feedback

Resources

OHS NPRM: [Reducing Federal Burden for Head Start Programs](#)

- [Preamble/Discussion of the Proposed Rule](#)
- [Summary Table of Proposed Changes](#)
- [Proposed Regulatory Text](#)

NHSA - [NPRM Resource Landing Page](#)

- [NPRM Summary](#)
- [NPRM Webinars](#)
- [Head Start Talking Points](#) (updated)

Feldesman LLC: [NPRM Blog Post](#)

PAIR & SHARE

What is one way your Head Start program is innovating - or could innovate - to navigate the changing landscape?



Turn to a neighbor – 3 minutes

Think About:



TODAY

What you're already doing differently today



ADAPTATION

How you might adapt if some or all of the proposed changes are finalized



POSSIBILITIES

New approaches, partnerships, or practices you could explore



Building Community



Virginia Head Start

**Taking the future in our hands in partnership with the Governor,
General Assembly and Virginia Department of Education**



VA HSLC Vision

Ensure that ***every*** Head Start program in Virginia has the tools, training, partnerships, and funding models necessary to ***thrive*** and ***expand*** their impact in Virginia's early childhood system.

VA HSLC Goals

01

Build a Strong, Sustained Partnership with Virginia's education leadership team and key state associations.

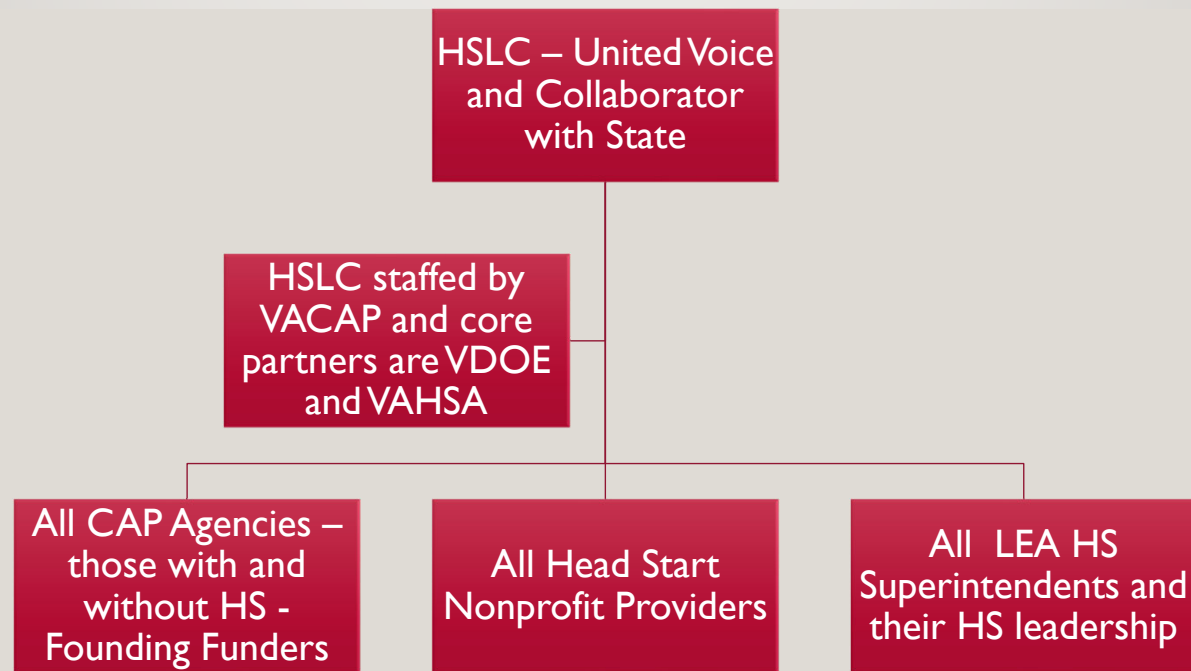
02

Increase visibility with the Governors Administration to maximize Head Start role in early childhood systems and economic mobility.

03

Build a Comprehensive Training, Technical Assistance, and Funding Support Infrastructure

Membership Structure



Virginia HSLC Priorities

(1) State funding for HSLC to develop and provide **customized Head Start Business**

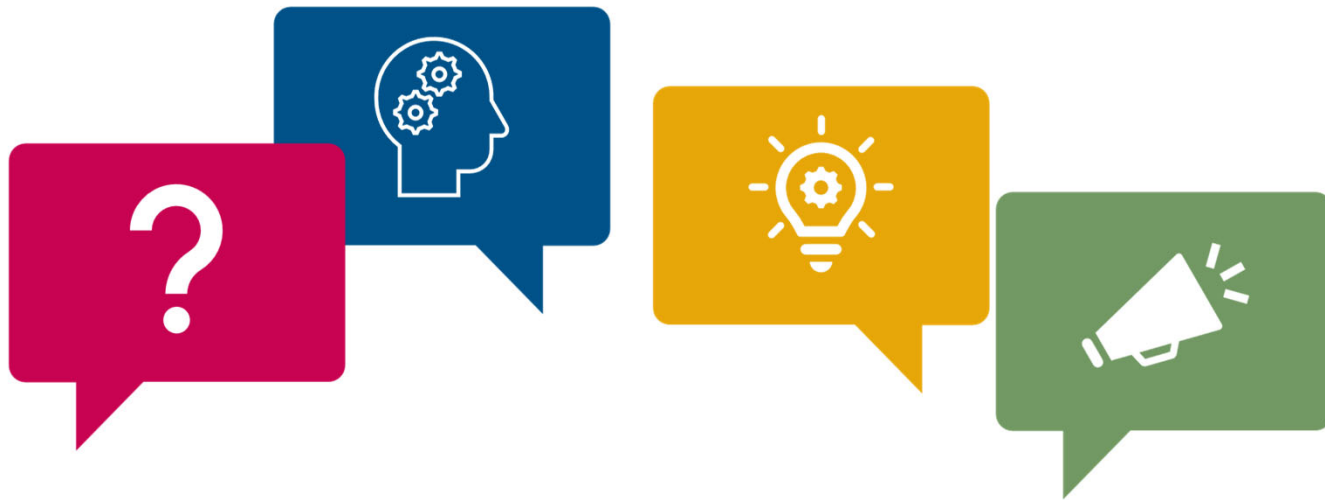
Operations Academy designed to provide consultant assistance/staff augmentation to help programs complement Head Start funding with state programs to more fully serve families and maximize and strengthen operational capacity through entrepreneurial and family focused mission support.

(2)- **Flexible state funding for Head Start Programs** to prevent further reduction of Head Start and Early Head Start slots in Virginia and increase capacity to serve more children and families.

Where are we now?

- HB211 support in partnership with VDOE
- Continuing to build relationships with state partners including agency responsible for quality rating - VECF

Questions & Discussion



Get in Touch!

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