



LSF HEAD START NPRM

PROPOSED RULE CHANGES AT A GLANCE

The NPRM would rescind Parts 1301–1305, replacing them with one streamlined Part 1301 — eliminating over 1,400 provisions.

Key Focus Areas

- **Reduce Regulatory Burden:** Remove duplicative federal rules; shift to state/local standards for ratios, safety, and transportation.
- **Staffing Flexibility:** Eliminate federal ratios, BA+ requirements, coaching mandates, and FSW caseload limits. Higher pay remains the #1 departure driver (56.1%).
- **Admin Cost Cap:** 15% → 5%: Shifts ~\$754.3M nationally from admin to direct services. Finance, HR, IT, and compliance may require major restructuring.
- **CLASS & Accountability:** CLASS Pre-K removed as sole quality measure. Monitoring streamlined; waiver authority expanded (not for nutrition, eligibility, or physical activity).

Strategic Implications of LSF

- **Financial Restructuring:** Admin cap reduction (15% → 5%) requires restructuring finance, HR, IT, and compliance — smaller programs face disproportionate pressure.
- **Workforce Balance:** Staffing flexibility may ease vacancies but risks larger workloads and reduced expertise; do not cut practices solely because requirements are removed.
- **Internal Accountability:** Less federal prescriptiveness demands stronger internal systems — Governing Bodies must maintain quality standards independent of compliance mandates.

Primary Focus	What the Change Is Trying to Accomplish	Likely Impact on Existing Head Start Programs
Reduce Federal Regulatory Burden	Remove detailed federal rules that ACF considers duplicative, overly prescriptive, or unnecessary.	Programs could spend less time demonstrating compliance with federal processes and more time determining how services should operate locally. However, programs will have greater responsibility for determining which requirements still exist under the Head Start Act, state law, licensing, and other federal laws.
Increase Local Program Flexibility	Give grant recipients more discretion over staffing, service delivery, program design, family services, education, and administrative practices.	Local leadership will have significantly more decision-making authority. Programs could maintain current practices or redesign them based on community needs and available resources. This also means greater local accountability for quality.
Shift from Federal Standards to State/Local Standards	Rely more heavily on state licensing and applicable federal/state/local laws for areas such as ratios, group size, safety, transportation, and background checks.	Head Start programs may operate differently from state to state. Programs in states with less stringent requirements could have considerably more flexibility than programs in states with stricter licensing requirements. ACF acknowledges that the effects will vary geographically.
Reduce Administrative Spending	Lower the allowable administrative cost limit from 15% to 5% and encourage resources to move toward direct services.	This could have a major organizational impact. Programs may need to restructure administrative positions, central-office functions, cost allocation, contracts, data systems, HR, fiscal operations, and other infrastructure. ACF estimates that about \$754.3 million nationally would shift away from administrative expenditures under the proposed cap.

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PROPOSED RULE CHANGES AT A GLANCE

(CONTINUED)

Primary Focus	What the Change Is Trying to Accomplish	Likely Impact on Existing Head Start Programs
Increase Staffing Flexibility	Remove certain federal staff qualifications, staff-child ratios, family service worker caseload requirements, coaching requirements, and specified staff roles.	Programs may have an easier time filling vacancies and could operate with fewer staff. However, this could increase staff workloads and reduce specialized expertise or individualized services. The NPRM's economic analysis specifically anticipates some programs serving the same number of children with fewer staff.
Reduce Prescriptive Education Requirements	Give programs greater discretion regarding curriculum implementation, coaching, professional development, assessment processes, and classroom structures.	Programs gain flexibility to determine how they support teachers and instruction. The concern is that instructional quality could become more variable across programs if strong local quality systems are not maintained.
Reduce Prescriptive Family-Service Requirements	Remove the federal family service worker caseload requirement and other detailed service requirements.	Programs could restructure family services and potentially reduce staffing costs. However, ACF acknowledges that changes in caseloads could affect the intensity or frequency of individualized family support.
Streamline Health and Mental Health Requirements	Remove or reduce detailed federal procedures while retaining applicable statutory requirements.	Programs may have greater flexibility in designing health and mental-health systems, but there is a risk that some services could be reduced. ACF acknowledges potential consequences in communities where Head Start plays a substantial role in connecting families with health care.
Reduce Federal Safety & Transportation Requirements	Remove numerous detailed Head Start-specific requirements and rely more on licensing and other applicable laws.	Programs could eliminate duplicate compliance systems. However, standards could vary more significantly across states and programs. Approximately 26% of Head Start service locations are not licensed through standard state child-care licensing systems, which makes this an important implementation issue.
Reduce Data and Continuous Improvement Requirements	Eliminate specified frequencies and processes for aggregating/analyzing child-level and program data and reduce prescribed community assessment processes.	Considerably less administrative work. Programs would still establish measurable goals and assess progress, but would have more discretion over how data are collected and used.
Increase Flexibility Through Waivers	Allow programs to request waivers from many regulatory requirements when certain conditions are met. Eligibility, nutrition, and physical activity requirements cannot be waived.	Programs could propose alternative service-delivery approaches that better fit their communities. This creates significant opportunities for innovation, although HHS retains authority to approve or deny waiver requests.
Change the Federal Accountability Model	Streamline monitoring and Designation Renewal requirements and remove CLASS: Pre-K as the sole regulatory classroom-quality measure and its current regulatory thresholds.	Programs may face less dependence on a single classroom-quality score, but there could initially be uncertainty regarding how classroom quality will be evaluated in the future. A valid and reliable observational assessment remains required by statute.

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