



Summary of Building Bright Futures' Comment on the Proposed Head Start Rule

In August 2026, the federal government proposed major changes to the rules that govern Head Start, the program that provides early education, health, and family support to children and families from households with low incomes and other needs. Building Bright Futures, Vermont's Early Childhood State Advisory Council, submitted a formal comment on that proposal. The full comment is available [here](#).

What we asked for

We asked the federal government to withdraw the proposed rule in full and keep the current Head Start Program Performance Standards. The current standards are a detailed list of rules that makes sure that the children and families who participate in Head Start receive high-quality programming and services to prepare them for school. We also said that if the government revisits these rules in the future, it should first base any changes in current, rigorous research, and consult the states and State Advisory Councils, including Building Bright Futures, that understand how these services actually work on the ground.

The current law says Head Start standards cannot be weakened

When Congress last reauthorized the Head Start Act in 2007, it included a clear protection: the federal government may not revise Head Start's standards in a way that reduces the quality, scope, or types of services children are guaranteed. We believe this proposal does exactly what the law forbids. This is a key reason we asked for the proposal to be withdrawn rather than adjusted.

What the proposal would do and why we object

The proposed rule would remove or weaken many of the federal requirements that define what a Head Start program must provide. In place of these national standards, most of these decisions would be left to each state or to each local program with no additional funding attached. In many cases, funding would be reduced. BBF objected to the following changes in our comment:

- **Teacher-to-child ratios and class size.** The rule would remove the national limits on how many children one teacher can care for and how large a class can be, leaving those limits to each state. We object because these standards are based on strong evidence that smaller groups and lower ratios mean safer, higher-quality care, especially for infants and toddlers. The main study the government cites to justify the change does not actually support it; its authors specifically warned that their findings should not be read as a reason to loosen ratio rules. Meanwhile the government's own cost estimate shows the projected savings would come directly from having each teacher care for more children, which is the very thing the research warns against.
- **The cap on administration, or "overhead."** The rule would cut the share of funding a program can spend on administration from 15 percent to 5 percent. We object because 5 percent is not realistic: by the government's own data, about two-thirds of programs would have to cut administrative spending to comply. These are the staff who coordinate services for children with

disabilities, manage eligibility and data, and keep programs running. At the same time, the rule adds new work for local programs, such as writing their own ratio policies, aligning with state licensing, and applying for waivers, so it increases the need for administrative capacity while cutting the ability to pay for it. Small, rural programs, like the ones in Vermont, are hit hardest, because they cannot spread these costs across the large enrollments that bigger states have.

- **Language of instruction.** The rule would require Head Start to teach only in English, ending current support for children's home languages. We object because this contradicts the research on how young children learn language, and the federal government's own policy guidance, both of which support developing a child's home language alongside English. It would also force programs to replace curriculum and materials at an estimated cost of \$51.7 million nationally, and disrupt instruction and family engagement for the multilingual families Head Start serves in Vermont and across the country.
- **Protections for children with disabilities, health, mental health, and safety.** The rule would remove federal protections for children with disabilities, the requirement for mental health consultation, the limits on suspending and expelling young children, and certain safety rules. We object because Head Start has reserved at least 10 percent of its slots for children with disabilities since 1972 and requires all its educators to be trained to support them, while most states have no comparable requirement. Removing the federal protection does not move these children into an equally protective state system; in most places, no such system exists. And returning suspension and expulsion decisions entirely to local discretion, with no federal standard, risks pushing out the very children the program was created to serve.

The data behind the claims

- **"The program's benefits fade out, so the standards are not worth keeping."** Some supporters of the rule point to research showing that Head Start's early academic gains fade by about third grade. This is not a new finding. When the government wrote the current standards in 2016, it examined the same research and reached the opposite conclusion: that the answer is more and better Head Start programs, through stronger quality and more time in the program, not fewer standards. We are not aware of any new evidence since then that changes that.
- **"Some programs spend too much per child, so they could serve more children for less."** A Head Start slot is not just child care. It includes health and developmental screening, services for children with disabilities, mental health support, nutrition, and help for families. So a higher cost per child measures how much service each child receives, not waste. In Vermont, nearly one quarter of the families that participate in Head Start are homeless, one quarter of the children have an Individualized Education Plan (IEP) or Individualized Family Service Plan (IFSP), and one tenth speak a primary language other than English. The government's own February 2026 spending analysis found that the differences in cost are explained by things like local cost of living, the type of program, and program size, with smaller programs costing more per child, rather than by mismanagement. Making a slot cheaper does not serve more children; it just reduces the services that each child receives.

- **"The changes will save money."** The government's savings estimate counts only the dollars saved inside Head Start. But the needs do not disappear when a requirement is removed. The costs shift onto other public systems, such as Medicaid, special education, and child care financial assistance. The government even acknowledges that families may have to find and pay for additional child care if program hours are cut, but does not count that as a cost. And calling Head Start's services "duplicative" of other programs misses the point: delivering them together, in one place a child already is, is exactly what makes them work for these families.

The bottom line:

We urged the Department to withdraw and rescind this proposal in its entirety, and retain the current Head Start Program Performance Standards.