

May 19, 2026

Director Lizbeth Casco White, J.D.
Office of Head Start
Attention: Director of Policy and Planning
330 C Street SW, 4th Floor
Washington, DC 20201

Docket ID ACF-2026-0364

Dear Director White:

This letter presents comments on the Notice of Proposed Rulemaking “Restoring Flexibility to Support Head Start Program Access” published by the Administration for Children and Families (ACF) on May 12, 2026. ACF officials are appropriately proposing to remove requirements from and reduce the regulatory burden on Head Start preschool centers nationwide. Researchers have found that Head Start fails to prepare children for elementary school, is rife with lapses in safety and is prone to mismanagement, all of which provides strong support for sunseting the program. In the meantime, however, Congress should convert Head Start funds to Education Savings Accounts (ESAs), so parents have more autonomy and choice over the education of their children, and federal officials should reduce red tape on the centers and give local centers more flexibility to meet student needs.

Today, taxpayers spend more than \$12 billion annually on Head Start, which enrolled 715,873 children in fiscal year 2024. Since the program’s inception, 40 million children have attended Head Start centers.¹

Taxpayer spending per child at Head Start locations is substantial compared to other childcare options. A recent report from the Department of Health and Human Services (HHS) found that

¹ Administration for Children and Families, “Head Start Program Facts: Fiscal Year 2024,” Head Start, last updated August 14, 2025, <https://headstart.gov/program-data/article/head-start-program-facts-fiscal-year-2024>.

the median spending per child is \$20,294 in Early Head Start and \$14,532 in Head Start Preschool.²

These figures exceed or rival the cost of many private childcare options. Nationally, center-based childcare averages roughly \$15,500 per year for infants and about \$12,500 per year for 4-year-olds.³ In some states, the average Head Start spending even surpasses the average K-12 public school spending per pupil. For example, in Idaho, federal taxpayers spend \$20,400 on the average Head Start slot, compared with to the average per student spending figure of \$10,300 in public K-12 schools.⁴ In Utah, the average Head Start figure is more than \$18,600, which is \$4,500 more than the state's average K-12 per-pupil spending amount.⁵

In 1998, Members of Congress mandated the first comprehensive, scientifically rigorous evaluation of the program, ultimately finding that Head Start did not result in lasting academic improvements for participating children. Researchers began their evaluation in 2002 and did not release the first wave of results in 2010 (with a subsequent report released in 2012). Researchers used randomized controlled trials, the gold standard in social science research, to assess program effectiveness, and the findings were sobering.

The 2010 study followed students who entered Head Start centers at ages 3 or 4 years and reviewed student progress as they entered kindergarten and first grade. Researchers found that the program “had little to no positive effects,”⁶ for children who participated, and that any initial benefits largely disappeared by the time children entered first grade.⁷

² U.S. Department of Health and Human Services, Assistant Secretary for Planning and Evaluation, Office of Human Services Policy, “Head Start Spending Per Slot Varies Widely Across Grants, Driven in Part by Cost of Living and Local Program Design Factors,” ASPE Reports, February 2, 2026, <https://aspe.hhs.gov/reports/head-start-spending-slot>.

³ “Child Care Aware of America, “Child Care in America: 2024 Price and Supply,” May 2025, <https://www.childcareaware.org/price-landscape24/>.

⁴ Clara Moore and Malia Nelson, “Revenues and Expenditures for Public Elementary and Secondary Education: School Year 2023-24 (Fiscal Year 2024),” U.S. Department of Education, April 2026, p. 6, [https://prod-ies-dm-migration.s3.us-gov-west-](https://prod-ies-dm-migration.s3.us-gov-west-1.amazonaws.com/nces/asset_builder_data/2026/04/2026008_FY24NPEFS_FirstLook.pdf)

[1.amazonaws.com/nces/asset_builder_data/2026/04/2026008_FY24NPEFS_FirstLook.pdf](https://prod-ies-dm-migration.s3.us-gov-west-1.amazonaws.com/nces/asset_builder_data/2026/04/2026008_FY24NPEFS_FirstLook.pdf) and Administration for Children and Families, “Head Start Program Facts: Fiscal Year 2024,” [Head Start](https://headstart.gov/program-data/article/head-start-program-facts-fiscal-year-2024), <https://headstart.gov/program-data/article/head-start-program-facts-fiscal-year-2024>.

⁵ Ibid.

⁶ Lindsey M. Burke and David B. Muhlhausen, Ph.D., “Head Start Impact Evaluation Report Finally Released,” The Heritage Foundation, Backgrounder No. 3823, January 10, 2013, <https://www.heritage.org/education/report/head-start-impact-evaluation-report-finally-released>.

⁷ Westat et al, “Head Start Impact Study Final Report,” Office of Planning, Research and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services, January 2010, https://acf.gov/sites/default/files/documents/opre/hs_impact_study_final.pdf.

The 2012 study, which tracked 5,000 children through third grade, found “little to no impact on cognitive, social-emotional, health, or parenting practices of participants,” and “on a few measures, access to Head Start had harmful effects on children.”⁸

Researchers from both the Heritage Foundation and the Brookings Institution reviewed the social science literature on Head Start participant outcomes and found the existing studies less reliable than the longitudinal study described here.⁹ Rachel Greszler and Lindsey Burke, Ph.D., explain that the two studies used by advocates of expanded preschool to promote early childcare (the Perry Preschool Project and the Abecedarian Project) are now decades old, contain research design flaws, and have not been replicated.¹⁰ The Brookings review, written by a former Institute for Education Sciences at the U.S. Department of Education, found only “modest positive associations between enrollment levels in state pre-K and later academic achievement once demographic differences among states are taken into account.”¹¹

More recent research published in the *American Economic Review* has found positive long-term outcomes for Head Start participants, but this study used a less rigorous design (a quasi-experimental design) than the federally-mandated longitudinal report.¹² Other studies have found improved long-term outcomes related to employment and earnings and less involvement with the justice system, but the researchers behind these studies did not use randomized controlled trials—again, a less robust research design than the Head Start Impact Study.¹³ While quasi-experimental research designs do not negate a study’s findings, the federally-mandated study remains the report with the strongest results in the research literature.

In 2022, the U.S. Department of Health and Human Services’ Office of Inspector General revealed widespread instances of abuse and neglect in Head Start programs between 2015 and 2020.¹⁴ The OIG report found approximately 1 in 4 grant recipients were involved in incidents in which children were abused, left unsupervised, or released to an unauthorized person. More

⁸ Burke and Muhlhausen, “Head Start Impact Evaluation Report Finally Released.”

⁹ Rachel Greszler and Lindsey Burke, Ph.D., “Rethinking Early Childhood Education and Childcare in the COVID-19 Era,” Heritage Foundation Backgrounder No. 3533, September 30, 2020, <https://www.heritage.org/education/report/rethinking-early-childhood-education-and-childcare-the-covid-19-era>; Grover Whitehurst, “Obama Preschool Proposal: How Much Difference Would it Make in Student Achievement,” Brookings Institution, June 19, 2013, <https://www.brookings.edu/articles/obama-preschool-proposal-how-much-difference-would-it-make-in-student-achievement/>.

¹⁰ Greszler and Burke, “Rethinking Early Childhood Education and Childcare in the COVID-19 Era.”

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Whitehurst, “Obama Preschool Proposal: How Much Difference Would It Make in Student Achievement.”

¹² Martha J. Bailey, Shuqiao Sun, and Brenden Timpe, “Prep School for Poor Kids: The Long-Run Impacts of Head Start on Human Capital and Economic Self-Sufficiency,” *American Economic Review* 111, no. 12 (December 2021): 3963–4001, <https://doi.org/10.1257/aer.20181801>.

¹³ See, for example, Eliana Garces, Duncan Thomas, and Janet Currie, “Longer-Term Effects of Head Start,” *American Economic Review* 92, no. 2 (May 2002): 999–1012.

¹⁴ Madison Doan, “Over 1,000 Safety Violations Mar Head Start. Children Deserve Better,” *The Daily Signal*, November 9, 2022, <https://www.dailysignal.com/2022/11/09/over-1000-safety-violations-mar-head-start-children-deserve-better> (accessed on April 20, 2026).

recently, a 2025 Government Accountability Office (GAO) report identified systemic failures, particularly among centers managed by interim operators.¹⁵ When the director of a Head Start center leaves, the federal Office of Head Start appoints an “interim” manager to operate the center. The GAO report documented at least 15 child-safety violations under interim management. The report found that Head Start staff did not report “significant child safety incidents” to the Office of Head Start, including a case in which “one former center director described witnessing a teacher grab a child by the hood of their coat and slam them to the ground.” Supervisory staff “instructed [the local Head Start center employees] to not report the incident or fire the teacher.”¹⁶ In general, the GAO report found that the Office of Head Start “has taken limited steps to assess whether Head Start facilities in programs under interim management were safe, as required by the Head Start Act and regulation.”

The GAO also found that the Office of Head Start failed to monitor enrollment or to recover funds for children who were no longer enrolled in the program.¹⁷ As a result, millions of taxpayer dollars were wasted because basic accountability mechanisms were not enforced. More concerning, these issues are not isolated to recent years but reflect persistent failures in program oversight and safety standards.

In 2011, the OIG reviewed 24 Head Start grantees, which included more than 175 Head Start locations across nine states, and found that none fully complied with federal or state requirements to protect children from unsafe materials or equipment.¹⁸ Almost 90 percent of grantees did not fully comply with federal or state requirements related to conducting criminal records checks or checks of child abuse and neglect registries. A 2020 Heritage report highlighted media reports of abuse at Head Start centers in seven states, five of which were not included in the 2011 report.¹⁹

For these reasons—financial inefficiencies, performance failures, and safety and other operational concerns—Head Start should be sunset. Again, as long as the program remains in

¹⁵ Madison Doan, “When Head Start Fails Our Children: A Wake-Up Call for Reform,” The Daily Signal, January 27, 2025, <https://www.dailysignal.com/2025/01/27/when-head-start-fails-our-children-wake-up-call-reform/>.

¹⁶ United States Government Accountability Office, “Head Start: Action Needed to Reduce Potential Risks to Children and Federal Funds in Programs Under Interim Management,” GAO-25-106954, December 2024, [GAO-25-106954](https://www.gao.gov/products/GAO-25-106954), [HEAD START: Action Needed to Reduce Potential Risks to Children and Federal Funds in Programs Under Interim Management](https://www.gao.gov/products/GAO-25-106954).

¹⁷ Ibid.

¹⁸ Office of Inspector General, U.S. Department of Health and Human Services, “Review of 24 Head Start Grantees' Compliance with Health and Safety Requirements,” December 13, 2011, <https://oig.hhs.gov/reports/all/2011/review-of-24-head-start-grantees-compliance-with-health-and-safety-requirements/>.

¹⁹ Jonathan Butcher and Jude Schwalbach, “Head Start’s Contagion of Fraud and Abuse,” The Heritage Foundation, Backgrounder No. 3467, February 28, 2020, <https://www.heritage.org/education/report/head-starts-contagion-fraud-and-abuse> (accessed on April 17, 2026).

operation, Congress should convert Head Start into an ESA program for families of preschool-age children.

President Joe Biden’s administration made significant changes to the Head Start Program Performance Standards, publishing the final rule on August 21, 2024 (effective on October 21, 2024).²⁰ The final rule included requirements that Head Start educators receive salaries comparable to those of local public school preschool teachers, or 90 percent of a local kindergarten salary benchmark if no local preschool teachers are available for comparison. The rule stipulates that wages must be comparable across Head Start and Early Head Start. Also, these federal programs must offer paid leave for full-time staff, access to behavioral health services, and health insurance. Head Start centers must comply with the benefit requirements by 2028 and the wage changes by 2031. In 2024, the federal Office of Head Start required new incident reporting procedures, simultaneously recognizing the safety lapses in Head Start centers and adding yet another layer of regulation.²¹

Following the issuance of the rule, the GAO reported that once the rule is fully implemented in 2031, the rule will require a spending increase of approximately \$2.3 billion.²² Together, these changes represent a significant expansion of federal requirements, and while the emphasis on health and safety is welcome, the projected spending increases cast doubts on the program’s cost-effectiveness.

The Trump administration’s efforts to rescind the wage and benefit requirements of the 2024 rule via this notice of proposed rulemaking would allow more flexibility and autonomy for local programs. This change would also restore 106,000 Head Start slots for children that would have been lost due to the Biden administration’s earlier rule—making the current proposal a step in the right direction.²³

ACF should continue to take lawful steps to improve program effectiveness, reduce regulatory burdens, and allow local centers’ flexibility to meet student needs. Recent analysis comparing federal Head Start requirements with state childcare regulations found that nearly all Head Start

²⁰“Head Start Final Rule Makes Big Changes to Staff Compensation, Program Eligibility, and More,” First Five Years Fund, August 22, 2024, <https://www.ffyf.org/2024/08/22/head-start-final-rule-makes-big-changes-to-staff-compensation-program-eligibility-and-more>.

²¹“Complying with the New Head Start Program Performance Standards in 2024,” Community Action Program Legal Services, Inc., October 2024, <https://caplaw.org/wp-content/uploads/2024/10/caplaw-complying-with-new-head-start-program-performance-standards-2024.pdf>.

²²U.S. Department of Health and Human Services, Administration for Children and Families, “Restoring Flexibility to Support Head Start Program Access,” *Federal Register* 91, no. 91 (May 12, 2026): 25842–25849, <https://www.federalregister.gov/documents/2026/05/12/2026-09383/restoring-flexibility-to-support-head-start-program-access>.

²³U.S. Department of Health and Human Services, Administration for Children and Families, “Restoring Flexibility to Support Head Start Program Access,” *Federal Register* 91, no. 91 (May 12, 2026): 25842–25849, <https://www.federalregister.gov/documents/2026/05/12/2026-09383/restoring-flexibility-to-support-head-start-program-access>.

settings are more restrictive than those imposed at the state level.²⁴ Vermont’s childcare rules were more restrictive than single-session Head Start centers, but all other Head Start settings were more restrictive than every other state’s childcare regulations.²⁵

These findings raise important questions about whether the program’s staffing, group size, and educational requirements are appropriately aligned with student needs. The report also notes that reducing regulatory burdens would likely lower the cost of providing the program and expand access for more children in addition to this proposed rule’s adjustments to salary requirements for Head Start employees.²⁶

The proposed rule changes in ACF-2026-0364 constitute appropriate steps that will deregulate Head Start. Federal officials should continue to reduce this program’s regulatory burdens, and lawmakers should use the evidence provided here to prepare to sunset the program.

Sincerely,

Madison Marino Doan, Policy Analyst, Center for Education Policy and
Jonathan Butcher, Acting Director, Center for Education Policy and Will Skillman Senior
Research Fellow at The Heritage Foundation

²⁴ Anna Claire Flowers, MA, et al, “2026 State Childcare Regulations Index,” Archbridge Institute, January 2026, <https://www.archbridgeinstitute.org/wp-content/uploads/2026/02/2026-State-Childcare-Regulations-Index.pdf>. Single Head Start sessions “are one group of 3- to 5-year-old children receiving care per day. Double sessions are two groups of 3- to 5- year-old children receiving care from the same staff on the same day.”

²⁵ The class size arrangement is specific to 9 kids aged two or younger in one classroom.

²⁶ Ibid.