



Notice of Proposed Rulemaking Talking Points: A Public Comment Guide

This document is a companion to the Head Start Collaboration Office brief, *Reducing Federal Burden in Head Start Programs: A Florida Snapshot* and designed to provide high level policy implications from the [Notice of Proposed Rulemaking \(NPRM\): Reducing Federal Burden in Head Start Programs](#). Every proposed area in the NPRM is interconnected as it is not possible to remove language and support from one area without direct impacts to other area. This document can be used to target specific areas relevant to your work, and your concerns as a Florida partner, and to help form your comments based on the cross-sector impacts the revisions propose. This document is not inclusive of all areas of the NPRM, rather it highlights key areas to best demonstrate the potential cascading community effects of the proposed revisions.

Sample templates are also provided for your convenience.

General Comments

1. The proposed NPRM does not eliminate the needs of children and families. It shifts responsibility for addressing those needs from Head Start to Florida's local systems, including Early Learning Coalitions, school districts, behavioral health providers, housing organizations, pediatric providers, and employers without providing additional state resources
2. Florida's early childhood system functions as an interconnected network and the NPRM should consider the cumulative impact on Florida's entire early childhood infrastructure, not solely the impact on Head Start grantees.
3. Head Start and community child care providers are complementary parts of Florida's mixed-delivery early learning system. Reducing these requirements will not reduce children's needs. Instead, those needs may shift to child care providers who often lack the funding and specialized support systems available through Head Start.
4. Florida Head Start programs employ more than 11,000 staff statewide, including more than 2,000 current or former Head Start parents, creating career pathways, economic mobility, and local economic activity in communities across Florida.
5. Florida Head Start programs currently identify developmental concerns, connect children to IDEA services, support DLL children, provide mental health support, and assist families experiencing homelessness before school entry. If these requirements are removed, more children may enter kindergarten needing intervention services that school districts will need to provide, shifting responsibility and cost to local school systems.

6. Head Start also is a critical point of intervention in the child welfare system and can help families before they enter the system, saving valuable state resources and helping families reduce Adverse Childhood Experiences (ACEs). Without these supports, communities may experience increased demand for higher-cost interventions later in a child's educational journey.
7. Florida school districts benefit when vulnerable children enter kindergarten having already received comprehensive services. Weakening these requirements could shift responsibility and cost to local school systems.
8. Many communities, particularly rural areas, lack sufficient infant, toddler, and extended-hour care options. Any reduction in Head Start services may create additional enrollment pressures for local providers.

Homelessness

1. Removing requirements for Head Start outreach, enrollment prioritization, and coordination with McKinney-Vento liaisons weakens one of Florida's earliest identification systems.
2. Eliminating continuous enrollment protections and transportation support may increase chronic absenteeism, which places more burden on the K-12 system when children enter kindergarten.
3. Head Start currently serves as an important entry point connecting families to housing, health care, transportation, and community resources. Removal of language supporting these entry points erodes access and the ability for families to move to self-sufficiency.
4. Head Start helps stabilize housing, attendance, and school readiness before kindergarten. Florida programs increased enrollment of children experiencing homelessness by more than 41% since 2021 and have helped close to 500 families experiencing homelessness acquire housing in 2025 alone.
5. Homelessness is a community issue, not solely an education issue. Florida Head Start programs are often the first point of contact connecting young children and families to housing supports, and these partnerships should be preserved.
6. Head Start currently provides developmental screenings, mental health consultation, family engagement services, disability coordination, and housing referrals. Community providers are often not funded to provide these services at the same intensity.
7. Removing requirements that support outreach, enrollment, transportation, and community partnerships may reduce access to services that help families achieve housing stability and economic self-sufficiency.

Disabilities

1. Removing the 45-day developmental screening timeline could delay identification and increase the number of children entering kindergarten with unmet developmental needs.

2. The proposed removal of screening and referral requirements risks creating delays during a critical developmental window.
3. Florida Head Start programs are identifying more children with disabilities every year. IDEA evaluations increased 56.6% between 2021 and 2025.
4. Head Start currently supports families through referrals, evaluations, IEP meetings, and transitions to kindergarten. These activities help reduce pressure on local school systems and help empower and prepare families for the K-12 system to best support their child.

Mental Health

1. The NPRM would remove detailed requirements for mental health consultation, coordinated services, and staff wellness support.
2. Florida communities already face shortages of behavioral health providers. Head Start mental health consultation often provides one of the earliest supports available to children and families.
3. Mental health consultation helps teachers manage increasingly complex classroom needs, strengthens staff well-being, and supports positive learning environments. Reducing these supports may contribute to educator stress, burnout, and workforce turnover.
4. Mental health services are an essential support that helps children build social-emotional skills, assists families, and helps educators manage increasingly complex classroom needs.

Dual Language Learners

1. Florida is one of the most linguistically diverse states in the nation. Federal standards supporting dual language learners help ensure consistent access to evidence-based language and literacy development practices for children and families.
2. Approximately 542,000 Florida children aged five are dual language learners, representing 42% of young children statewide.
3. Florida Head Start programs served more than 20,000 DLL children in 2025.
4. Removing requirements supporting home-language development could result in more children entering kindergarten needing intensive language and literacy supports.
5. Research consistently shows that supporting a child's home language strengthens English acquisition and literacy development.
6. Effective communication with families improves parent engagement and school readiness outcomes.

Ratios and Group Size

1. Florida already allows some of the highest staff-child ratios in the country under child care licensing standards.
2. Head Start ratios are intentionally lower because programs serve children experiencing homelessness, disabilities, developmental delays, and trauma.
3. Increasing classroom ratios may reduce opportunities for individualized instruction, intersecting with less support for children with disabilities, and family engagement.
4. Aligning Head Start classrooms to general licensing standards could reduce quality and increase educator burnout, contributing to a continued workforce shortage in the field.

Duration of Services

1. Longer Head Start service days help working parents maintain employment and pursue education. Duration requirements support continuity for working families and help stabilize enrollment.
2. Many Florida families rely on Head Start's extended-day services to maintain employment.
3. Reduced program duration could increase requests for wraparound care, placing additional pressure on local ELC networks and providers. Many communities, particularly rural areas, lack sufficient infant, toddler, and extended-hour care options. Any reduction in Head Start services may create additional enrollment pressures for local providers. ELCs are likely to see increased demand for subsidy assistance and child care placement support if Head Start service duration becomes less consistent across communities.

Sample Templates for Public Comment:

[Submitting Public Comments for the Head Start NPRM](#)

[NPRM and IECMHC - Comments How To.pdf](#)

References

National Head Start Association. (2026, August 20). *NPRM early read: Our top issues talking points* [Policy guidance document]. National Head Start Association.

Florida Head Start Collaboration Office. (2026). *2026 Head Start and NPRM* [Policy brief]. Florida Department of Education, Division of Early Learning.