The race to the bottom: What replacing Head Start ratios standards with state child care minimums will mean for children in poverty

By Morgan Healy and Steve Barnett

Introduction

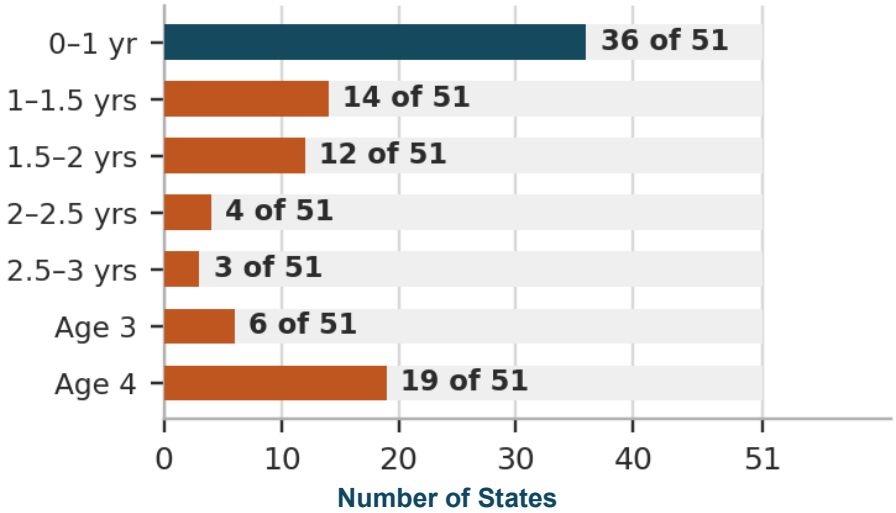
On August 6th, 2026, the Trump administration unveiled plans to eliminate 80% of the standards that govern Head Start. Chief amongst these changes is the proposal to default Head Start staff:child ratio limits to those established by state child care licensing standards. Head Start ratio standards are based on expert consensus and empirical evidence that pre-K quality is higher and children are safer and develop more when there are reasonable limits to the number of young children per staffer in the classroom. Current Head Start standards limit staff:child ratios to 1:4 for babies and toddlers under age 3, 1:8 for 3 year olds and 1:10 for 4 year olds. In contrast, state child care licensing ratios are set by each state and vary enormously.

This brief compares the ratio standards of Head Start regulations are they are currently written to state child care regulations across all 50 states and DC, and asks: if Head Start programs defaulted to state child care licensing minimums, what would change? And how do state child care ratio requirements compare to those of public pre-K in the same state?

Three key takeaways from the data

- Currently, only 12 states (24%) have child care licensing standards that meet the 1:4 staff-to-child ratio requirement set by Head Start for children ages 1-2. The vast majority allow more children per staffer.
- Just 4 states, or 8%, have child licensing ratios requirements equivalent to those of Head Start for two year olds, and only 3 states (6%) meeting ratio standards for two-and a half year olds.
- If the Head Start ratio standards are eliminated defaulted to state child care minimums, the number of toddlers per staffer will more than double in 9 states, including Mississippi, Louisiana, Georgia, Arkansas, Kentucky, Texas, Florida, North Carolina and Nevada.

Figure 1. Number of states where child care licensing requirements meet the Head Start staff:child ratio standard



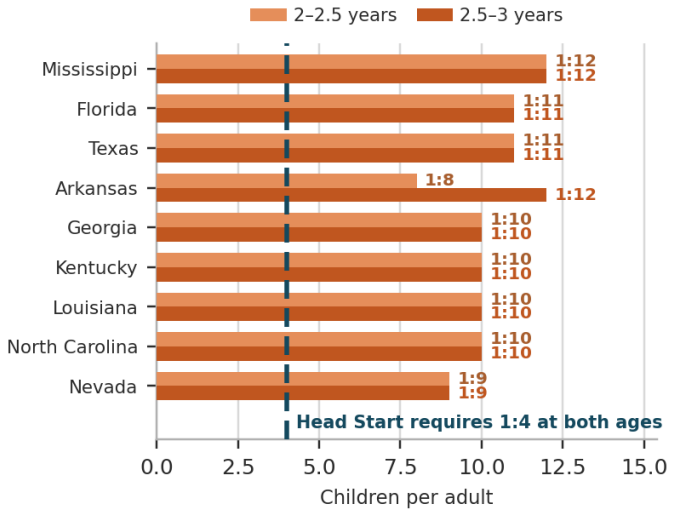
Only Connecticut, Massachusetts and West Virginia license child care at 1:4 for 2.5-3 year olds This is the widest gap of any age group: the median state permits a ratio of 1:8, exactly double the Head Start requirement. Mississippi and Arkansas permit 1:12, three times the limit.

Where the gaps are widest

Averages across states understate what is at stake in particular states if ratio requirements default to child care licensing minimums. Because Head Start's ratio regulations are a single national floor for all programs, reductions to state

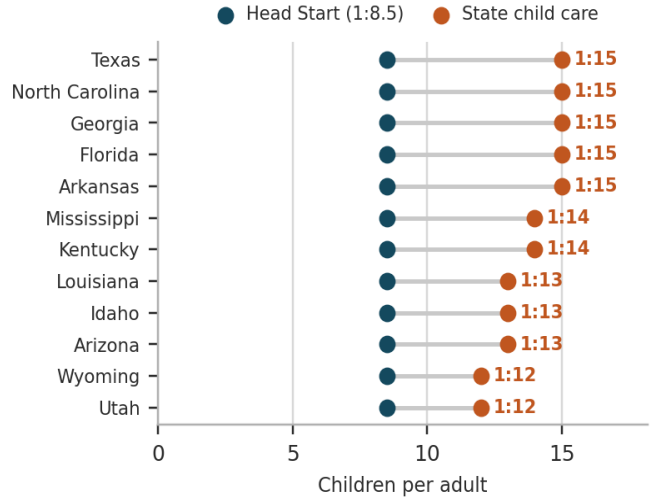
licensing minimums mean there will be widespread changes that are state contingent. States with highest poverty rates for children under age 5 will see the largest ratio increases for children per staffer.

Figure 2. Two-year-olds: Ratio comparison between Head Start standards (1:4) and state child care licensing requirements with the highest ratios of children to staff



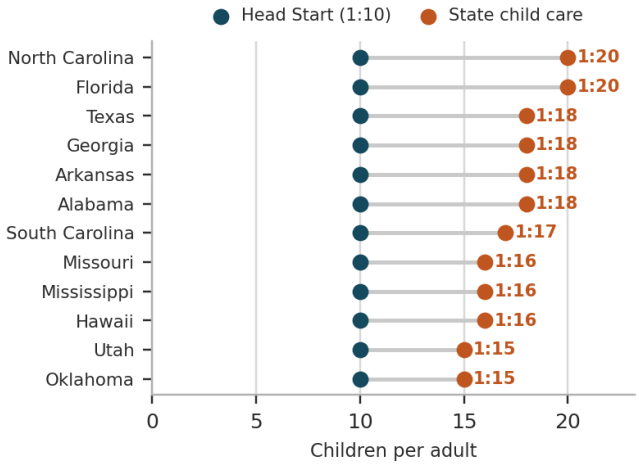
The nine primarily southern states that would see a doubling and tripling of toddlers to staffer ratios if Head Start standards default to child care licensing minimums.

Figure 3. Three-year-olds: Ratio comparison between Head Start standards (1:8) and state child care licensing requirements with the highest ratios of children to staff.



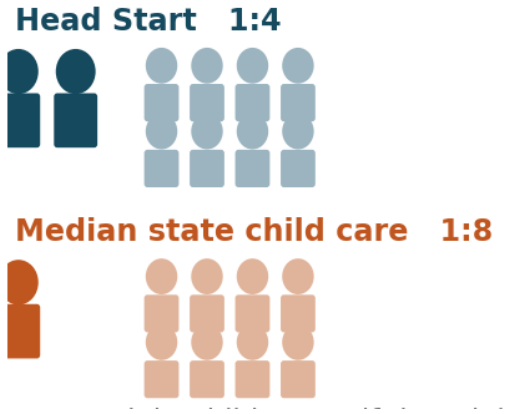
Twelve states with the largest child to staff ratio requirements for three year olds. Five states license child care at 1:15, nearly doubling the current staff-to-child ratio allowed in Head Start.

Figure 4. Four year olds: Ratio comparison between Head Start standards (1:10) and state child care licensing requirements with the highest ratios of children to staff



Head Start limits staff:child ratios to 1:10 for 4-year-olds. Florida and North Carolina child care licensing requirements set limits at 1:20, and Georgia, Arkansas, Alabama, and Texas cap ratios at 1:18—nearly doubling the children per staffer if ratio requirements are removed.

Figure 5. Head Start ratio limits 2 year olds vs. median state child care ratio limits for 2 year olds.

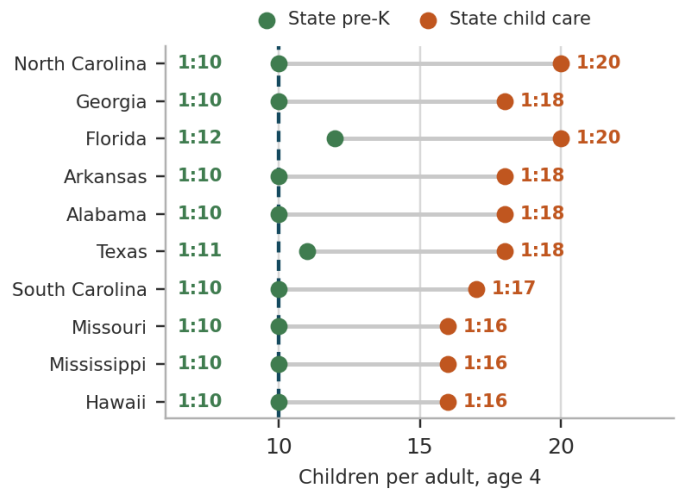


If median state child care licensing requirements were to replace Head Start standards this would roughly double the number of toddlers per staffer across all Head Start programs nationally.

States hold their pre-K programs to a higher ratio standard than licensed child care

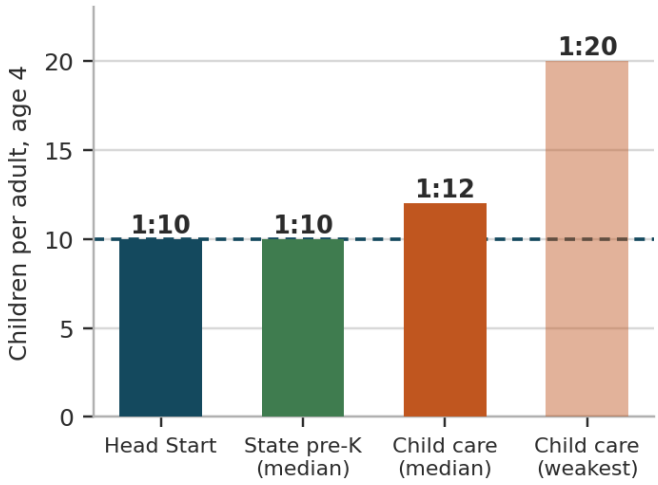
Child care licensing is not the only benchmark states set. Most states also fund pre-K programs designed to promote school readiness and as such, set stricter ratio requirements. Comparing child care licensing requirements to pre-K requirements within the same state is revealing: most state pre-K programs require staff:child ratio limits that are similar to those of Head Start—suggesting that ratio limits reflect a program's broader goals about child development and learning.

Figure 6. The ten states with the largest difference in state child care vs. pre-K staff:child ratio requirements



Staff:child ratio limits for four year olds in the same state, comparing state pre-K (green) to state child care licensing (orange). In all states presented, child care licensing allows 6 to 10 more children per adult than pre-K in the same state, akin to an increase of 75% to 100%.

Figure 7. Variation in requirements for staff:child ratios for four year olds depending on program type



Head Start and the median state pre-K programs hold the same staff:child ratio limit for four year olds: 1:10. Median child care licensing allows an additional two children per staffer 1:12, and the weakest state licensing standards permit double the Head Start requirement.

The case for decreasing ratios, not increasing them

If Head Start ratio limits were to drop to those of state child care licensing minimums, what could we reasonably expect of teachers' behaviors and children's development? Multiple meta-analytic reviews show that teachers interact with young children more frequently, and in more developmentally appropriate, positive and less coercive ways, when they have fewer children to supervise. This finding is born out in additional studies which use random assignment. Francis & Barnett (2019) found that randomly assigning preschool sessions to teachers with 15 rather than 20 children produced more one-to-one interaction and larger literacy gains and review studies of US pre-K programs find that staff:child ratios under 7.5 significantly predict more positive developmental and learning outcomes.

Substantial research demonstrates that maintaining low child-to-teacher ratios is critical for positive interactions and learning gains, meaning any weakening of Head Start ratio standards poses direct threats to child safety, development, and overall program effectiveness.

Source: United States Department of Health and Human Services, Administration for Children and Families (n.d.) Approved CCDF Plans (FY 2025-2027), Section 5.2.2. https://acf.gov/occ/form/approved-ccdf-plans-fy-2025-2027 Coding Procedure for data developed by Meeks et al. (2026) in the report: Lowering the Bar: An Analysis of How Replacing Head Start Standards with State Child Care Licensing Weakens Early Learning Across the United States. The Children's Equity Project at Arizona State University. https://cep.asu.edu/resources/An-Analysis-of-How-Replacing-Head-Start-Standards-with-State-Child-Care-Licensing-Weakens-Early-Learning-Across-the-United-States. Full age-group coding details can be found on pg. 96 of the report.

What Head Start programs and advocates can do

Submit a public comment to the NPRM at **regulations.gov** before the 30 day deadline.

- Comments are strongest when they cite data comparing child care licensing to current Head Start ratio requirements in your state and what these changes could mean for increases in children per staff.
- You can find your state's child care licensing and pre-K staff:child ratio regulations here.

ABOUT NIEER
The National Institute for Early Education Research (NIEER) at the Graduate School of Education, Rutgers University, New Brunswick, NJ, conducts and disseminates independent research and analysis to inform early childhood education policy.

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Suggested citation:
Healy, M.R. & Barnett, W. S. (2026). The race to the bottom: What replacing Head Start's staff-to-child ratios standards with state child care minimums would mean for children in poverty.