



Head Start Operates Within Existing State Child Care Licensing Infrastructure and Includes Established Supports for Alignment and Coordination Between Systems

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KEY POINTS

- Most Head Start programs operate within existing state child care licensing infrastructure.
- About 74 percent of Head Start's 17,000 service locations reported having a state license to operate.
- Early Head Start-Child Care Partnership Programs provide Head Start services in child care centers or family child care homes that are state-licensed, representing about 17 percent of Early Head Start funded enrollment.
- In Fiscal Year 2024 (FY24), states reported approximately 232,054 licensed providers across child care centers and family child care homes.
- The estimated number of unlicensed Head Start service locations is about two percent of the licensed child care provider universe.
- State child care licensing agencies maintain the core administrative systems and functions required to license new providers.
- Head Start Collaboration Offices (HSCOs) support coordination between Head Start entities and state entities and are well-positioned to help Head Start grant recipients navigate state child care licensing and other requirements.
- Further alignment of Head Start within state licensing systems would build on rather than duplicate or create new child care licensing infrastructure.

BACKGROUND

States play a central coordinating role in an early childhood mixed-delivery system that includes Head Start, child care programs, and state pre-K programs. One important aspect of accountability across this system is licensing. Child care and early childhood education licensing regulations are set by state and territory governments and identify minimum standards that programs must meet to be licensed to operate.^{1,2,i} Many Head Start programs operate within existing state licensing infrastructure.

ⁱ Additional detail about state-by-state child care licensing regulations can be found in the [National Database of Child Care Licensing Regulations](#).

Some programs can be exempt from state licensing (referred to as license-exempt), which means they can legally operate without a license. While each state defines license-exempt programs differently, examples can include center-based programs that are already regulated by a different government agency (e.g., programs operated by public schools, or military child care programs), faith-based programs, or home-based programs where the provider is related to the children they care for, care for only a few children, or provide care occasionally for only a few hours a day.³ States and territories may still require license-exempt programs to meet certain health and safety standards.

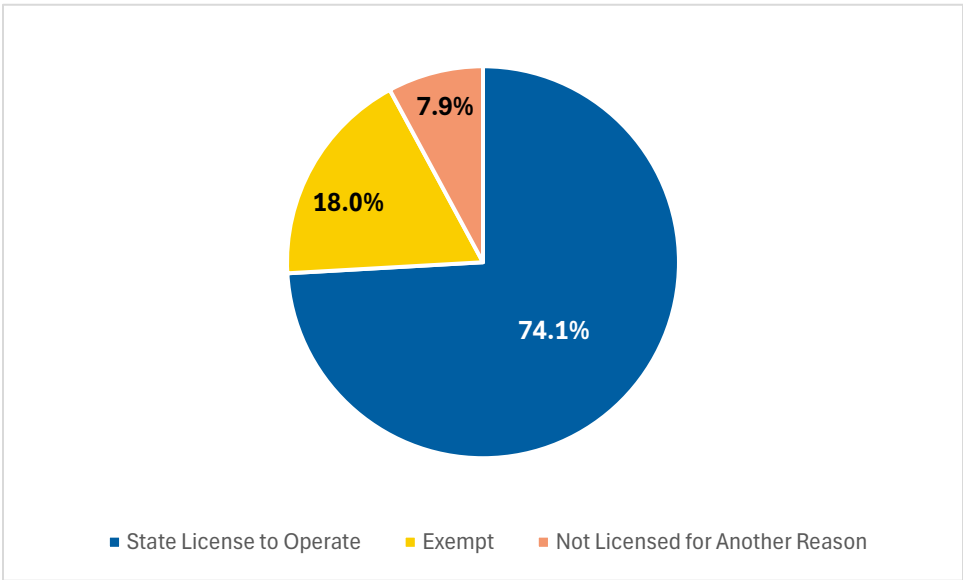
This brief describes available data on the licensing status of Head Start service locations and child care programs, and outlines existing infrastructure that can support alignment and coordination between Head Start and state licensing systems.

MOST HEAD START FACILITIES ARE ALREADY SUBJECT TO STATE LICENSING

According to the most recent Administration for Children and Families (ACF) administrative data, there are approximately 17,000 Head Start service locations nationwide (right-most column of Table 1).ⁱⁱ These facilities include primarily center-based Head Start Preschool, Early Head Start (EHS), American Indian and Alaska Native (AIAN), and Migrant and Seasonal Head Start (MSHS) service locations, in addition to a small subset of non-center based locations such as family child care providers and sites for group socializations.

Of these service locations, about 74 percent (around 12,700 locations) reported having a state license to operate (Figure 1). The remaining 26 percent of unlicensed service locations (around 4,500 locations) were reported as exempt from licensing (18 percent) or not licensed for another reason (8 percent).

Figure 1. Most Head Start Service Locations Have a State License to Operate, FY26



ⁱⁱ Precise counts of Head Start facilities nationwide are difficult to determine because service location data are reported and maintained by grant recipients. Service location records may lag during grant transitions or when there are changes in service delivery that affect the data reported.

Many Head Start programs also receive child care subsidies, including through the Child Care and Development Fund (CCDF), that subject them to state licensing requirements. A preliminary internal ACF analysis of nationally representative data found that 36 percent of Head Start programs received child care subsidies.

State licensing systems interact with a substantial network of providers participating in Head Start funded service delivery, through the Early Head Start-Child Care Partnership (EHS-CCP) program. In the EHS-CCP program, EHS grant recipients partner with child care programs to provide high-quality child care services to infants, toddlers, and their families.⁴ These services are provided in child care centers or family child care homes that are state-licensed and meet applicable safety requirements.⁵

In December 2017, ACF reported EHS-CCP partnerships involving approximately 1,600 child care centers and 1,070 family child care homes.⁶ Since FY16, EHS-CCP has supported about 32,000 slots annually, equivalent to roughly 17 percent of funded EHS slots.

STATES ALREADY LICENSE LARGE NUMBERS OF PROGRAMS, SO RELEVANT ADMINISTRATIVE STRUCTURES AND FUNCTIONS ARE ALREADY IN PLACE

States are responsible for licensing a substantial number of child care programs. The Quality Progress Report (QPR) from the ACF Office of Child Care collects the total number of licensed center-based providers and licensed family child care homes from each state and territory. In the FY24 QPR, states reported approximately 232,054 licensed providers (Table 1). About 52 percent of all licensed providers are child care centers and 48 percent are family child care providers.

In the context of the state child care licensing universe, the estimated number of Head Start service locations that are currently unlicensed (about 4,500) makes up about two percent of the existing licensed child care provider universe. Table 1 displays an estimate of the number of unlicensed Head Start service locations by state; this estimate assumes that the national average of 74 percent of service locations being licensed and 26 percent being unlicensed holds true across each individual state.

Table 1. Number of Licensed Child Care Facilities and Head Start Service Locations by State

	Number of Licensed Child Care Centers	Number of Licensed Family Child Care Homes	Number of Head Start Service Locations	Estimate of Unlicensed Head Start Service Locations
Alabama	1,336	525	259	67
Alaska	223	195	91	24
American Samoa	46	3	17	4
Arizona	2,255	284	382	99
Arkansas	1,731	210	180	47
California	14,549	30,228	2,520	655
Colorado	3,146	1,386	276	72
Connecticut	1,370	1,796	96	25
Delaware	467	428	32	8
District of Columbia	353	102	65	17
Florida	6,622	1,930	898	233
Georgia	3,238	1,134	322	84
Guam	66	2	--	
Hawaii	533	241	101	26

Idaho	754	402	77	20
Illinois	2,759	5,525	537	140
Indiana	778	2,127	227	59
Iowa	1,520	1,907	209	54
Kansas	1,196	3,067	131	34
Kentucky	1,744	254	339	88
Louisiana	1,563	--	322	84
Maine	774	658	88	23
Maryland	2,621	4,075	173	45
Massachusetts	2,939	5,590	174	45
Michigan	4,580	3,324	550	143
Minnesota	1,826	5,871	269	70
Mississippi	1,513	179	227	59
Missouri	1,825	525	313	81
Montana	337	547	102	27
Nebraska	1,149	1,603	144	37
Nevada	472	178	77	20
New Hampshire	612	107	35	9
New Jersey	4,086	1,356	212	55
New Mexico	772	261	180	47
New York	7,067	10,771	966	251
North Carolina	4,211	1,115	407	106
North Dakota	487	667	54	14
Northern Mariana Islands	32	4	12	3
Ohio	6,243	2,243	659	171
Oklahoma	1,543	1,625	348	90
Oregon	1,396	2,413	303	79
Pennsylvania	5,464	996	806	210
Puerto Rico	520	198	737	192
Rhode Island	419	407	41	11
South Carolina	1,462	827	195	51
South Dakota	413	342	105	27
Tennessee	1,854	466	355	92
Texas	10,496	4,228	1,031	268
Utah	524	958	132	34
Vermont	655	413	52	14
Virgin Islands	46	0	12	3
Virginia	2,646	1,328	349	91
Washington	2,402	3,777	309	80
West Virginia	671	704	391	102
Wisconsin	2,163	1,550	226	59
Wyoming	368	165	45	12
National Total	120,837	111,217	17,160	4,462

Note: The number of licensed child care centers and family child care homes is based on internal ACF data from the FY24 QPR. The number of Head Start service locations is based on internal ACF administrative data from September 2026. Some reported Head Start service locations may also be included in the total number of licensed child care centers or family child care homes.

Licensing a small percentage of additional facilities is not likely to be burdensome for states. State licensing systems routinely accommodate changes in the number of regulated providers. For example, between FY23 and FY24, the total number of licensed providers reported on the QPR increased by about one percent. The number of licensed child care centers increased by 0.2 percent and the number of licensed family child care homes increased by 1.7 percent. These changes in licensed child care supply from year to year are about half of the estimated number of Head Start facilities that are currently unlicensed.

State child care licensing agencies already maintain the core administrative systems and functions required to license new providers. For example, functions can include receiving and reviewing licensing applications, evaluating compliance with health and safety standards, conducting inspections and monitoring, maintaining provider records, and overseeing child care providers on an ongoing basis.⁷ States typically charge fees to cover costs associated with these functions, often structured as initial application fees and recurring renewal fees.

EXISTING HEAD START INFRASTRUCTURE SUPPORTS STATE-LEVEL COLLABORATION

Section 642B of the Head Start Act requires collaboration between Head Start and state early care and education systems.⁸ Since the 1990s, Head Start Collaboration Office (HSCO) grants have been awarded to support coordination and collaboration between Head Start entities and state entities that provide services to low-income children and families, including the state agency responsible for administering the Child Care and Development Block Grant (CCDBG) and entities providing child care resources and referral in the states. The Head Start Act specifically authorizes HSCOs to facilitate coordination to promote better linkages between Head Start agencies and other child and family agencies, including agencies that provide health, mental health, family services, disability services, and other child or family supportive services.⁹

According to the FY23 HSCO Annual Performance Reports,¹⁰ about half of HSCOs are housed in the state education, early learning, or early childhood agency. About 20 percent of HSCOs are housed in the state health, human, and/or social services agency. Thus, HSCOs are an established infrastructure that can facilitate communication between Head Start programs and state child care licensing agencies, identify and resolve implementation issues, and support alignment across systems. Specifically, HSCOs are well-positioned to help Head Start grant recipients navigate state child care licensing and other requirements.¹¹

CONCLUSION

The majority of Head Start service locations nationwide are already licensed by states, and states already license and oversee a large universe of child care providers. States also regularly conduct monitoring on license-exempt providers. Head Start grant recipients and states can build on their experience meeting state license requirements in child care settings serving Head Start children through the EHS-CCP program. Further, HSCO offices provide the infrastructure that supports coordination between Head Start grant recipients and state early care and education systems. Further alignment of Head Start within state licensing systems would build on rather than duplicate or create new child care licensing infrastructure.

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