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Distinguishing Burdens from Benefits in Early Care and Education Policy

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Abstract

Contemporary policy conversations discuss burdens imposed by regulations, describing when they render government functions ineffective and inefficient. But one can mislabel the core purposes and benefits of a policy's existence as burdens. Applying the administrative burden framework to early care and education (ECE) policy, we describe what ECE providers face while navigating disparate state and federal systems and funding sources, making determinations on which policy to enact and how, when misaligned. These impose opportunity costs that can affect children and families, potentially reducing the benefits provided by the policies. Our framework delineates burdens from benefits afforded by ECE policies, including enforcement of safety, quality, and learning standards. It is layering, redundancy, and opacity in ECE policies that can lead to burden and pose clear tradeoffs for safety and quality, but not ECE regulations writ large. We discuss ways to examine policy design, burden reduction, and ultimately child and family outcomes.

Keywords: *Early Care and Education Policy; Administrative Burden*

Distinguishing Burdens from Benefits in Early Care and Education Policy

Early care and education (ECE) is an essential component of family life. In theory, it provides families with stable care, enabling parents or caregivers to work or attend school while positively supporting children's development (Burchinal et al., 2022). Federal funding of ECE programs for low-income, working families, like the Child Care and Development Block Grants (CCDBG) and Head Start, and state funded programs like prekindergarten (pre-k), provide the care infrastructure for parents working towards economic stability.

Yet accessing ECE programs forces parents and providers to face an uncoordinated patchwork of offices, funding streams, and applications. This is because ECE policy administration is dispersed across state agencies. Different government departments or community organizations within a state may be responsible for things like funding, enrollment, reimbursement, quality improvement (e.g., quality rating and improvement systems [QRIS]), or monitoring licensing requirements (Barnett et al., 2009; Jenkins & Henry, 2016; Kagan & Rigby, 2003; Kauerz, 2008; Waldfogel, 2006; Witte & Trowbridge, 2005). In turn, policies and guidelines often are inconsistent within the same state and for the same populations of children (Buell et al., 2024; Whitaker et al., 2022). ECE providers, especially those serving children eligible for public funding, must navigate the bureaucratic landscape of each ECE program within their state and comply with the disparate policies governing each funding source, which may conflict. The stress and hassle of ECE providers traversing the ECE policy landscape is the root experience of administrative burden (Moynihan et al., 2015).

Most policy research and debate wrestles with assessing program effectiveness and right-sizing funding or benefit generosity. It is welcome then, that scholars and policy stakeholders are paying relatively more attention to the incoherence, inefficiencies and burdens created by policy complexity (Teles, 2013). Indeed, the consensus view among scholars is that the haphazard nature of ECE policy governance undermines the policy goals of child development and family support (e.g., Yoshikawa et al., 2018).

But recent discussion at the federal level of policy deregulation in ECE on account of "administrative burden" conflates the essential benefits of policymaking—like safety standards, quality assurance, and harm protections for children—with bureaucratic red tape. In August 2026 the federal government posted a "Notice of Proposed Rulemaking" (NPRM) in service of reducing administrative burden in the Head Start Program by eliminating most of the heavily regulated program's requirements (Administration for Children and Families [ACF], 2026). These include removing requirements to serve pregnant women and conduct recurring background checks on staff working with children, and deferring to minimum state guidelines for teacher-student ratios to replace the federal standards, which are more stringent than state standards, on average (Meek et al., 2026). Several proposed Head Start policy changes add selective administrative burdens, such as new verification requirements for a family's homeless status and for child age, and more expansive authority to cancel 5-year grants at any time (ACF, 2026).

We present a conceptual framework, building on Moynihan et al. (2015) and others that have advanced the theory (e.g., Doughty & Baehler, 2020), that distinguishes between the burdens of ECE policies from the benefits afforded by them. We describe the processes providers undertake to navigate and blend program funding mechanisms, which co-occur with the public goods policies provide to the ECE workforce, families, and children. We posit that the multiple burdensome interactions with different government agencies borne from the fragmented ECE bureaucracy likely have detrimental effects for the ECE workforce. Ultimately, this makes

ECE worse for children and families. This framework makes clear that policies enforcing safety and quality standards are the essential job of government policy–it is the layering, redundancy, and opacity of these policies across funding streams that can lead to burden. Moreover, mislabeling benefits as burdens can further erode an already strained ECE workforce. By separating actual burdens from benefits, policymakers can more precisely diagnose problems and trim burdens appropriately.

Early Care and Education Policies and Unexamined Burdens

Child care and ECE policy have expanded over time in a piecemeal fashion, with each individual state creating a bespoke decentralized governance system across various government agencies and at different levels of government. Policy opportunities for a more centralized ECE system have never succeeded, such as the Lanham Act providing nationwide child care during World War II or the Comprehensive Child Care Act of 1971 (Rose, 2010). Most recently, the COVID-era Build Back Better Act from the House of Representatives that proposed affordable high-quality child care, free pre-k for 3- and 4-year olds, and a national universal birth to 5 system, failed. In turn, ECE programs in the United States are governed by a complex set of policies stemming from state-level child care licensing requirements, federal, state, and local funding guidelines, and state or local quality improvement initiatives, outlined in Appendix Table 1.

ECE programs are funded by numerous sources including private tuition, federal Head Start grants, child care subsidies, state general funds, or state pre-k (NASEM, 2017). Estimates from a nationally representative sample of ECE programs suggest that approximately 75% of programs are combining at least two forms of funding to operate (Duer & Jenkins, 2023). Infamously, California has 14 different funding sources that support ECE (Melnick et al., 2017).

This conglomeration of funding streams is necessary because ECE programs are not fully funded for services through any existing mechanism.

Public funding sources each have their own regulations that must be layered on top of provider licensing requirements, supplementary guidelines like pre-k standards, and participation requirements for QRISs. Such regulations are often broad, covering topics from health and safety (e.g., labeling medications), instructional practices (e.g., whole group, small group), and requirements for teachers (e.g., professional development) and classrooms (e.g., materials, observational ratings, child assessments).

ECE providers are left largely on their own, with limited local support, to navigate complex regulations. In turn, incoherent blends of policy force individual providers to act as street-level bureaucrats, making determinations on which policy to enact and how, when misalignment occurs (Lipsky, 1980). These discretionary judgements across layers are posited to contribute to variability in ECE program quality and the extent to which programs enhance children's development (e.g., Buell et al., 2024; Whitaker et al., 2022). Most directly, forcing upon providers the daily enforcement of each relevant policy operating at their site is the essence of administrative burden.

Administrative Burden in ECE Policy

Administrative burden is defined as the onerous experience of a citizen's interactions with the government to access and maintain benefits, including their time, hassle and frustration (Burden et al., 2012; Heinrich, 2018). Moynihan and colleagues (2015) further define administrative burdens as the learning, psychological, and compliance costs borne from interacting with the government, either at program take-up or for continued participation. Learning costs arise when citizens become aware of a program and then must understand whether they are eligible and how they access the program. Psychological costs can arise from the stress and loss of autonomy one feels from following program processes, or from having to choose which policies to implement and how. Compliance costs come from following administrative rules and requirements, like completing applications, seeking reimbursement, producing documentation, responding to discretionary demands, or re-enrolling. Although burdens are present throughout government agencies, they are prolific within social programs, particularly with respect to compliance, reflecting political frames of welfare programs as sites of fraud, waste, and abuse (Brodkin & Lipsky, 1983).

Within ECE, researchers have identified administrative burdens primarily from the perspective of the family (Bouek, 2023; Lin et al., 2022); for instance, the paperwork required for enrolling children in care, or waitlist processes that prevent enrollment. State discretion in the implementation of the Child Care and Development Fund (CCDF) program leads to burdensome initial certification and recertification processes, where parents spend many hours traveling to offices to understand rules and eligibility and to verify their employment and income for approval (Lowe & Weisner, 2004; Sandstrom et al., 2015). The subsequent psychological costs borne by already overwhelmed families then view the costs of the program outweighing benefits, and leave (Adams et al., 2002; Crosby et al., 2005; Scott et al., 2005; Shlay et al. 2004). Jenkins and Nguyen (2022) examined how the continual compliance burdens imposed by state CCDF programs on enrolled families affects child care stability. They found that extending states' CCDF redetermination period length (the intervals at which families must recertify their eligibility) by one-month increased state median subsidy spell length by 1.4 weeks (0.32 months); in other words, reducing burdens improved program outcomes.

Although program policies clearly create burdens for families, each of these instances creates trickle-down burdens for ECE providers. Studies of CCDF provider experiences document substantial learning and compliance costs with respect to application and renewal paperwork, monthly reimbursements, payment dispute resolution, working with multiple CCDF agencies, and in helping families navigate the CCDF system (Adams et al., 2008; Karolak & Mansfield 2000; Rohacek, 2012). In turn, large providers allocate full-time staff to deal with subsidy administration, but others find the psychological burdens of CCDF so overwhelming that they do not participate at all (Slicker et al., 2023; Washington & Reed, 2008). Critically, these continual compliance costs absorbed by providers on behalf of their families take away time and effort from their core objective—providing quality care for children.

Head Start, state pre-k, and QRIS regulations and guidelines also can create administrative burden for ECE providers. Much like CCDF, these can take the form of determining program eligibility, setting standards for educators, monitoring compliance and quality thresholds, and layering policies within each child care site to create a cohesive program. However, there exists a dearth of research systematically documenting burdens across ECE funding streams. From what is available, the main sources of burden occur from aligning policies (e.g., Buell et al., 2024). For instance, Whitaker et al. (2022) examined state preschool curriculum policies, finding substantial variation *within* a state in whether and which curricula were required by state pre-k, QRISs, and state CCDF funding. This is important because burdens arise from a mismatch of layered policies, not from the mere existence of policy. In this context, simply removing standards does not address the chaotic field within and across states. In fact, it likely weakens programs if the standards eliminated are those which impose the most stringent benchmarks for child or staff safety.

A Framework for Understanding Administrative Burdens and Benefits of ECE Policies

Figure 1 depicts our conceptual framework. We posit that ECE policies and regulations that stem from funding in the political, community, and cultural context offer both benefits and burdens to families and ECE providers. This incorporates prior administrative burden research in ECE and builds upon that work by delineating burdens for providers and the pathways through which burdens can affect child development. For instance, a direct burden from the regulatory context may be duplication of paperwork or differing child assessment schedules or instruments that complicate and obscure policy compliance. Further, burdens experienced by parents likely pass through to ECE providers, such as eligibility determination and enrollment paperwork. Each of these specific burdens correspond to a cost(s) discussed by Moynihan et al. (2015)—learning, psychological, compliance.

The framework also organizes how both the benefits and burdens spurred by ECE policies and funding can have indirect effects on children's development. Positive effects originate from safer, higher-quality environments and interactions in care. In this case, removing core policy elements would be counterproductive. Negatively affecting children are the increased administrative tasks imposed by policies that reduce provider time for child and family interactions, and increase provider stress. For instance, adding new age verification requirements, much like proposed in the Head Start NPRM (ACF, 2026) takes time away from the core duties of providing high-quality interactions to children in care.

Benefits, like quality benchmarks, do not come without their own costs to implement; upholding standards of education and care require work, investment, and dedication of staff. For example, in the 2026 Head Start NPRM (ACF, 2026), the Trump administration proposed eliminating the 5-year staff background check requirement. While this is a burden for providers, it is one that keeps children safe. Similarly, staffing requirements like mental health services or shift breaks likely increase teacher retention, decreasing the costs associated with staff turnover and filling vacancies. In our framework we consider these factors as benefits for the family or ECE provider. Put simply, *the costs associated with setting and maintaining policy standards are potentially "burdensome" but are fundamentally different from administrative burden.*

Unequal Distribution of Administrative Burden in ECE. Implementing disparate ECE policies does not equally affect all ECE providers. ECE policies can lead to stratification of families based on demographic factors, which can result in unequal outcomes, including ECE staff pay (Iruka, 2019; Whitebook et al., 2018). Head Start and other community-based ECE programs largely serve more Black and Latine children, lower-income families, and employ higher proportions of Black and Latine ECE teachers compared with public schools offering pre-k (Weiland et al., 2022). Because they are also the most likely to access funds from multiple sources (Slicker & Hustedt, 2022), the burdens of delivering multiple policies disproportionately falls on providers of color and providers serving families with the highest needs, especially those serving infants and toddlers or children with disabilities.

Recommendations for Future Research

Research on the administrative burden experienced by families in accessing ECE services continues to paint a clear picture of the structural hurdles that prevent equitable use and retention in care (e.g., Jenkins & Nguyen, 2022). ECE providers already experiencing challenges, including pay disparities with early elementary school teachers and mental health concerns (Souto-Manning & Melvin, 2022), have been overlooked in the discussion of administrative burden. Our framework offers a way to organize research around these issues within the ECE field and systematically derive evidence to develop and support policy recommendations.

Importantly, our framework extends beyond administrative burdens to separate out programmatic benefits, which may also require time and costs to implement, but are critical to a program's mission and goals. We encourage researchers to engage with this framework in the following ways, and to develop and refine this framework as evidence and policy evolves.

We have very little understanding of the processes ECE providers undertake to navigate, layer, and implement multiple policies tied to program funding. What do providers do when confronting misaligned policies, such as those for instructional practices or child assessment (e.g., Whitaker et al., 2022)? Determining the key challenges faced by the ECE workforce that can be addressed through policy (e.g., a reduction in administrative burden) could lead to increased retention of providers. However, alleviating burden should be considered in concert with wage increases to retain highly-skilled and qualified ECE providers (Markowitz & Bassok, 2026).

Current attempts to deregulate may also place additional burden on ECE providers, like the proposed removal of caseload limits and staff breaks in the Head Start NPRM (ACF, 2026). It is imperative that we understand the consequences of these policy actions as well. Research has—rightfully so—centered on evaluating the effects of imposing regulations, like teacher-child ratios, and raising quality standards (e.g., Kelly et al., 2026). We know very little about the impacts of *removing* regulations, which is what the federal government is proposing in the recent Head Start NPRM (ACF, 2026). Furthering our understanding in this area will provide critical evidence to policymakers in determining necessary program elements for children's development and workforce retention.

Additionally, administrative burden for providers may not be equal across domains and burden costs. Researchers should investigate whether learning, compliance, or psychological costs are most associated with provider or child outcomes. Are costs additive or multiplicative, and does there exist a threshold of costs (or deregulation) before burdens result in decreasing care quality? Similarly, there may be topics in ECE where burdens are substantial (e.g., background checks or dental exams), but the benefits for safety, practice, and support to the provider or the children may outweigh the costs. Future research could examine burden costs systematically, apply “reasonableness tests” to assess whether bureaucratic procedures are necessary in different instances (Doughty & Baehler, 2020), and identify areas where there exist opportunities to harmonize standards or requirements across funding streams to alleviate providers of administrative burdens.

Although there has been significant progress to create integrated data systems (King, 2022), further work is needed to establish comprehensive systems that track funding, policy choices, discrepancies between funding and choices, and ultimately child and family outcomes. True integration would allow systematic analyses into where misalignment occurs for providers, the policies involved, the prevalence of such instances, and how specific elements of funding streams may relate to key provider, family, and child outcomes. At the provider level, researchers should evaluate the utility of new data tools to assist with alleviating burden, such as artificial intelligence applications. For example, if software allows for a more seamless accounting of funding streams and associated requirements, is there a reduction in learning or psychological costs? Can these tools be made accessible to the diverse field of ECE providers? Answering such questions can help to right size burdens and facilitate effective policy decision-making.

Conclusion

As the ECE field continues to evolve through expansion, changes in funding sources, and potentially deregulation, the administrative burden experienced by ECE providers must be addressed. Yet, the extent to which providers experience costs associated with receiving public funds is unknown. Case studies (e.g., Stockstill, 2023) provide some beginning insight into the complexities facing ECE providers as they navigate policies, but much more systematic research is needed.

Burdens create opportunity costs, drawing ECE providers' attention away from care, and towards navigation and compliance. Yet with policy requirements also come benefits, and these functions are the essence of a policy's existence—ensuring safety standards, documenting children's medical needs, and creating opportunity. We urge caution in eliminating policies without fully understanding the ripple effects on other aspects of the ECE system. Parsing policy burden from benefits requires a scalpel rather than shovel approach to the landscape.

Streamlining policies, reducing duplicative efforts, and working to alleviate unnecessary costs can result in a strengthened ECE workforce and further promote children's development. But conflating program standards with administrative burdens writ large risks doing more harm than good.

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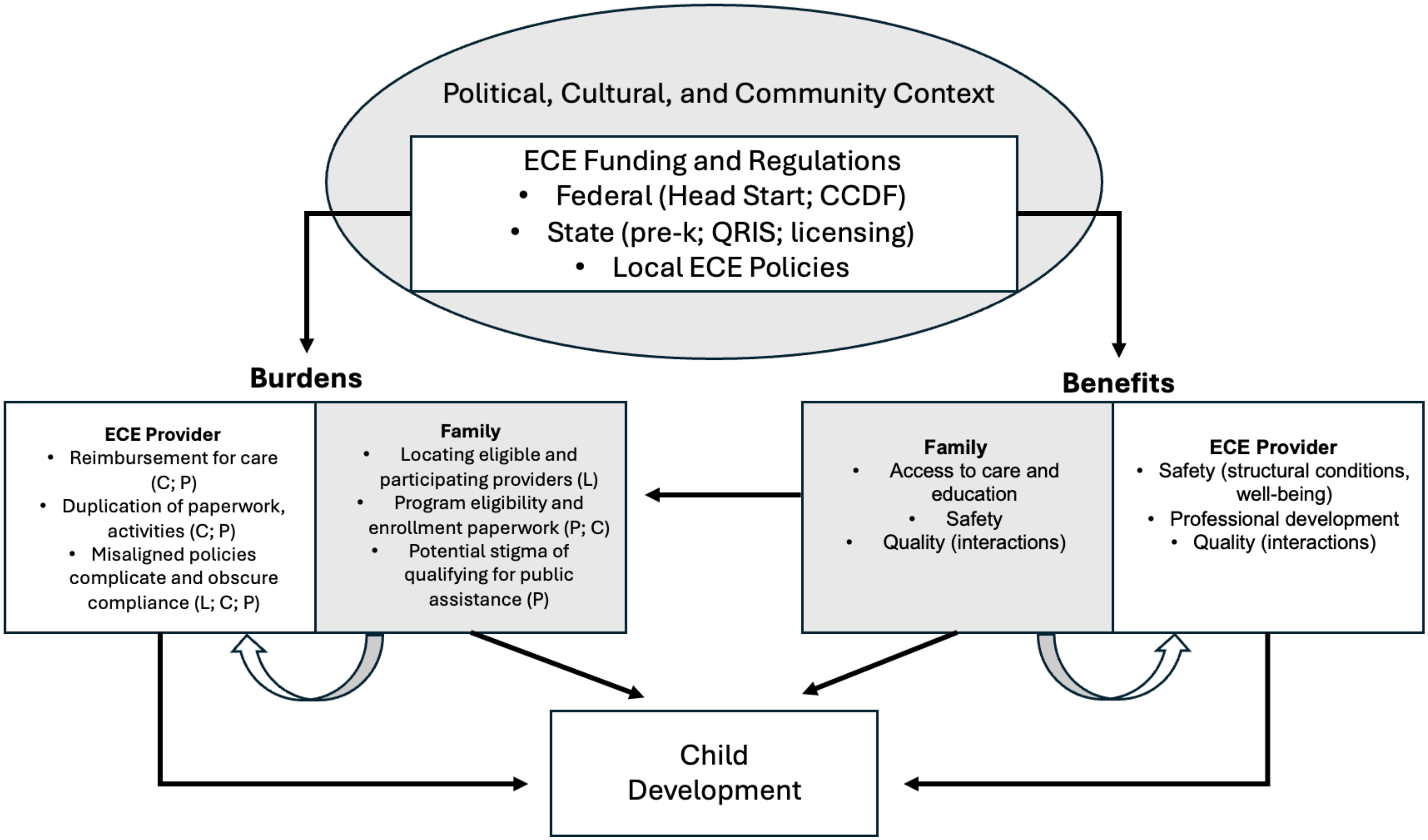
Figure 1. *ECE Provider Administrative Burden and Benefit Conceptual Framework*



Appendix Table 1

Overview of ECE Federal- and State-Level Funding Sources, Policies, and Population Served

Program	**Description**	**# of Children Served**	**Funding**	**Populations Served**
Federal Policies				
Head Start/ Early Head Start	Supports the well-being of low-income families and young children by providing families with access to a variety of services (e.g., educational, social, health) in a range of care settings (e.g., center-, home-, & family-based).[ab]	778,420 per year[a]	$11.996 billion (Federal)[a]	Low-income pregnant women and expectant families, families with income < FPL, infants and children ages 0-5 years, families experiencing homelessness, families receiving public assistance (e.g., TANF, SSI, SNAP), and children within the foster care system.[b]
Child Care and Development Fund (CCDF)	Provides financial support (i.e., child care subsidies) to low-income families, enabling them to work or participate in job training. CCDF funding can also be spent on efforts to improve quality and establish higher standards within the child care sector.[c]	1.4 million per month[d]	$12.3 billion (CCDBG: $8.75 billion), (Child Care Entitlement to States [CCES]: $3.55 billion)[e]	Low-income working families with children ages 0-12 and incomes at or below 85% of the SMI. Exception: Children with special needs may qualify from ages 0-18. Other eligibility requirements determined by individual state discretion.[f]
Child and Adult Care Food Program (CACFP)	Provides child care centers, family or group day care homes, after school care centers, and homeless shelters with cash reimbursements for serving nutritious meals and snacks to children and youth.[g]	4.4 million per day[h]	$4.8 billion (Federal)[j]	Children ages 0-12 years attending child care centers and day care homes. Children ages 0-18 in after school care centers and homeless shelters.[g]

Individuals with Disabilities Education Act (IDEA) Part C	Early intervention services for young children with disabilities.[n]	441,515 per year[o]	$540 million[o]	Children ages 0-2 with disabilities.[n]
Individuals with Disabilities Education Act (IDEA Part B)	Services for school-aged children with disabilities.[p]	7.6 million per year[p]	$14.6 billion[p]	Children ages 3-21 with disabilities.[p]
State or Local Policies				
State Prekindergarten	Educational program intended to promote kindergarten readiness skills (e.g., social skills, reading) among young children.[k]	1.63 million per year[l]	$11.73 billion (state spending)[l]	Children ages 3-5, depending on the state policy.[k]
Child Care Licensing	Minimum health and safety requirements that child care providers must meet to legally operate, as determined by state and territory governments.[m]	N/A	N/A	All child care providers. However, some center-based and in-home child care programs are determined exempt by states and territories.[m]
Quality Rating and Improvement System (QRIS)	A system aiming to enhance continuous quality improvement within ECE settings by awarding quality ratings to programs who meet defined standards, beyond minimum licensing requirements. Five elements comprise QRIS: program standards, supports for programs and practitioners, financial incentives, quality assurance and monitoring, and consumer education.[i]	N/A	N/A	Depending on the system.

Note. SMI = State median income.

a = https://headstart.gov/program-data/article/head-start-program-facts-fiscal-year-2023
b = https://www.acf.hhs.gov/ohs/about/head-start
c = https://www.childcareaware.org/our-issues/public-policy/child-care-and-development-block-grant-ccdbg/ccdbg-overview/?utm_campaign=&utm_term=&utm_medium=ppc&utm_source=adwords&hsa_kw=&hsa_mt=&hsa_grp=126046169222&hsa_tgt=dsa-19959388920&hsa_net=adwords&hsa_cam=15026042079&hsa_ver=3&hsa_acc=2314880181&hsa_src=g&hsa_ad=554854506894&gclid=CjwKCAjww7KmBhAyEiwA5-PUSjgA_FoRvI3ehuQ-A4zRiTDhYt68Fy183mKw2FBpEAVJ1bBqWBDxRxoCjTgQAvD_BwE
d = https://www.acf.hhs.gov/occ/quick-fact
e = https://www.ffyf.org/policy-priorities/ccdbg/
f = https://childcareta.acf.hhs.gov/understanding-federal-eligibility-requirements
g = https://www.fns.usda.gov/fns-101-cacfp
h = https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/child-and-adult-care-food-program#:~:text=The%20Child%20and%20Adult%20Care,a%20cost%20of%20$3.9%20billion
i = https://www.aft.org/position/early-childhood-education-quality-rating-improvement-systems
j = https://www.cacfp.org/assets/pdf/Farm-to-ECE-Funding-Guide_July-2024_FINAL/
k = https://childcare.gov/consumer-education/prekindergarten-programs
l = https://nieer.org/yearbook/2023/executive-summary#:~:text=In%20the%202022%2D2023%20school,in%20all%20except%20six%20states.
m = https://childcare.gov/consumer-education/child-care-licensing-and-regulations
n = https://ectacenter.org/partc/partc.asp
o = https://ectacenter.org/partc/partcdata.asp
p = https://www.congress.gov/crs-product/R41833