

**Restoring Flexibility to Support Head Start Program Access
A Proposed Rule by the Department of Health and Human Services on 05/12/2026**

June 11, 2026

The Honorable Robert F. Kennedy, Jr.
Secretary of United States Department of Health and Human Services
RE: Docket ID ACF-2026-0364: RIN number 0970-AD21

Dear Secretary Kennedy:

For over 60 years, Head Start has served as an essential support for children from families with low incomes to succeed, providing high-quality education and comprehensive services to almost 40 million children since its inception.¹ We are writing in opposition to the proposed rule, *Restoring Flexibility To Support Head Start Program Access* (Docket ID ACF-2026-0364: RIN number 0970-AD21) which would undermine the program's continued ability to provide the high-quality support to children, parents, and the economy that Head Start is known for.

The Center for American Progress, the Center for Law and Social Policy, the National Association for the Education of Young Children, the National Women's Law Center, and the undersigned organizations oppose the proposed rule and encourages the Office of Head Start ("OHS") to maintain the 2024 Head Start Final Rule and abandon the 2026 Head Start Notice of Proposed Rulemaking for the reasons below.

Introduction

Head Start faces a crisis, with inadequate program funding creating significant challenges in recruitment and retention in the Head Start workforce. Workforce turnover has caused an increase in underenrollment, resulting in fewer families receiving the high-quality programming Head Start offers. Qualified educators and staff are essential to the success of the Head Start model and families' access to it, and the proposed rule's overturning of a commitment to meaningfully compensate the workforce for its essential work undermines grantees' ability to deliver essential services to the children and families who depend on them. The proposed rule change cites a desire "to improve access to quality services,"² but removing the wage and benefit provisions from the 2024 rule will exacerbate high turnover rates, risk deepening an existing supply crisis, and ultimately limit Head Start's ability to deliver high-quality care. Low wages and access to programming are inextricably linked, with both being worsened by inadequate appropriations for Head Start.

¹ Amanda Geduld, "Poverty Wages, Staffing Crisis: New Federal Rule Looks to Sustain Head Start," The 74, September 9, 2024, available at <https://www.the74million.org/article/poverty-wages-staffing-crisis-new-federal-rule-looks-to-sustain-head-start/>

² Federal Register, "Restoring Flexibility To Support Head Start Program Access," May 12, 2026, available at <https://www.federalregister.gov/documents/2026/05/12/2026-09383/restoring-flexibility-to-support-head-start-program-access>

Furthermore, the anticipated erosion of program quality that may result from this proposed rule contradicts section 641A of the Head Start Act, which stipulates that any revisions to program standards must not result in the elimination of or reduction in quality, scope, or types of services provided by the program. Eliminating the wages and benefits provisions for Head Start staff as OHS has seen significant reductions in force and the closure of half of the nation's regional offices will further diminish grantees' ability to provide their services.³ In turn, the comments below outline the research and rationale supporting the importance and need for the 2024 provisions that this Notice of Proposed Rulemaking seeks to reverse.

I. Low compensation and lack of benefits drive Head Start educators and staff from programs.

Qualified educators and staff are essential to Head Start delivering high-quality programming to children and families. Yet despite the complex skills needed to adequately promote the learning and development of young children and the demanding nature of the role, Head Start educators earn considerably less than the average annual income of similarly-credentialed kindergarten teachers in public schools.⁴ Head Start lead teachers are paid an average of \$30,000 to \$40,000 annually,⁵ a figure which has not meaningfully increased since 2010 after accounting for inflation,⁶ and remains far below the average \$63,000 earned by similarly-credentialed kindergarten teachers. Removing the 2024 provision (§ 1302.90(e)) to provide education staff with wages comparable to public preschool teachers will worsen that disparity and further challenge Head Start's ability to recruit and retain excellent teachers.

Head Start's strong standards have created the most credentialed Head Start workforce in history,⁷ helping to promote high-quality services and positive long term outcomes for children. But even as Head Start staff qualifications have grown, their wages and benefits have stagnated, decreasing staff incentives to remain in the Head Start workforce. These gaps are further pronounced for Early Head Start staff serving infants and toddlers, who earn even less

³ Allie Schneider, "Closures of Head Start Regional Offices Jeopardize Critical Services for Children and Families," Center for American Progress, April 29, 2025, available at <https://www.americanprogress.org/article/closures-of-head-start-regional-offices-jeopardize-critical-services-for-children-and-families/>

⁴ Mattie Mackenzie-Liu, Dow Drukker, Diane Schilder, and Clare Waterman, "Head Start and Early Head Start Workforce Salaries: A State-by-State Glance," Urban Institute, March 2024, available at https://www.urban.org/sites/default/files/2024-03/Head_Start_and_Early_Head_Start_Workforce_Salaries.pdf

⁵ Ibid.

⁶ Sabrina Eaton, "Federal government proposes Head Start teacher salary boost," Cleveland, December 22, 2023, available at <https://www.cleveland.com/news/2023/12/federal-government-proposes-head-start-teacher-salary-boost.html>

⁷ Office of Head Start, "Sec.648A Staff Qualifications and Development," Head Start Policy and Regulations, available at <https://headstart.gov/policy/head-start-act/sec-648a-staff-qualifications-development>

than their counterparts serving preschool aged children.⁸ Head Start staff are not just losing ground to similarly credentialed teachers in public schools but to workers in entry-level service sector jobs, underscoring the need for regulatory action providing all Head Start staff a salary sufficient to cover basic costs of living.⁹ Repealing the pathways to adequately compensate Head Start staff and to close the pay gap between infant and toddler and preschool teachers risks increasing staff attrition and reducing available slots for families.

Further, the recent surge in Head Start staff turnover underscores the need for improved wages and benefits, in stark contrast with OHS's proposed rule. Compounded by the immense strain on the early educator workforce in the COVID-19 pandemic, the lack of real wage growth for Head Start staff has made it difficult for Head Start grantees to staff their classrooms and serve eligible children and families. The Administration for Children and Families reported that some Head Start programs were experiencing challenges meeting full enrollment during the 2023-2024 program year, largely due to staff shortages; that same year, 65 percent of Head Start staff reported that enrollee vacancies were higher than usual.¹⁰ One study of Head Start teacher turnover found that the annual Head Start turnover rate in 2025 reached as high as 41 percent in some regions as a result of insufficient wages.¹¹ The same study indicated that teachers who perceived they had more job resources and intrinsic rewards were less likely to leave.

Head Start educators and staff need access to benefits including health insurance, paid leave, and behavioral health services in order to remain in their roles and provide high-quality services to young children, and should not have to compromise their access to basic needs to do their job. Early educators have an uninsurance rate of 13 percent, and close to 30 percent depend on Medicaid for health care access.¹² We urge OHS to listen to the workforce and maintain pathways to the compensation and resources that America's early educators have said they need in order to serve our nation's families and engage in the economy.¹³ In a January 2026

⁸ Heather Sandstrom, Michelle Casas, and Cary Lou, "Working Conditions and Well-Being of Center-Based Infant-Toddler Teachers," Urban Institute, April 2023, available at https://www.urban.org/sites/default/files/2023-04/Working%20Conditions%20and%20Well-Being%20of%20Center-Based%20Infant-Toddler%20Teachers_0.pdf

⁹ Center for the Study of Child Care Employment, "Early Educator Pay & Economic Insecurity Across the States" (2024), available at <https://csce.berkeley.edu/workforce-index-2024/the-early-childhood-educator-workforce/early-educator-pay-economic-insecurity-across-the-states/>

¹⁰ Office of Head Start, "Head Start Program Facts: Fiscal Year 2024," available at <https://headstart.gov/program-data/article/head-start-program-facts-fiscal-year-2024>

¹¹ K.A. Kwon and others, "A longitudinal study of Head Start teacher turnover trends and factors," April 2025, available at <https://fpg.unc.edu/publications/longitudinal-study-head-start-teacher-turnover-trends-and-factors>

¹² Georgetown Center for Children and Families, "Medicaid is a Critical Support for the Early Childhood Education Workforce."

¹³ Kendall LaParo and Anna Shaw-Amoah, "Understanding Increases in Head Start Teacher Turnover During COVID-19," Research for Action, July 2024, available at <https://www.researchforaction.org/research-resources/early-childhood-education/understanding-increases-in-head-start-teacher-turnover-during-covid-19/>

survey, half of Head Start educators who were considering leaving the field said they were more likely to stay if offered access to employee benefits.¹⁴

Moreover, early education professionals are perceived to experience greater stress and depression than the national workforce, therefore the expansion of staff benefits and wellness will help promote better holistic health for Head Start teachers and staff, which will improve program quality and stability.¹⁵ Access to health insurance, paid sick leave, paid family leave, and paid vacation or personal leave are all crucial benefits for promoting personal health, protecting children's health, and improving staff retention. We support all employees' access to paid leave, including part-time workers who can accrue leave based on the hours worked.

II. High rates of turnover among Head Start educators and staff result in underenrollment and eventual classroom closures, impacting the program's ability to deliver high-quality early education to families who depend on Head Start services.

Due to chronic underfunding at the federal level, the Head Start workforce has long faced low compensation, limited access to comprehensive benefits, and high rates of educator burnout that drives teachers from the classroom and limits access for eligible families. Repealing the 2024 requirements to improve Head Start wages and benefits will increase instability among Head Start teachers and staff, hampering the program's ability to deliver high-quality early education opportunities and comprehensive services to young children and their families.

Research has repeatedly found that low compensation is the key driver of early educator turnover, fueling the supply shortage as classrooms sit empty.¹⁶ Of Head Start program leaders reporting their programs were not enrolled at their preferred capacity in a 2026 survey:¹⁷

- **Almost 60 percent** said it was due to not having enough staff to open those classrooms, with the vast majority recognizing that the compensation they offer is too low to recruit and retain enough staff;
- **51 percent** reported that their staff turnover had increased in the past year, and **54 percent** reported increasing difficulty retaining staff;
- Among Head Start educators, more than one-quarter – **29 percent** – reported that they were considering leaving the early childhood education field within the next year;
- Of that 29 percent, **nearly 60 percent** reported that higher or sufficient wages would increase the likelihood that they would remain in their roles;

¹⁴ Analysis of data from National Association for the Education of Young Children, “A Year of Tough Choices”: The Child Care Affordability Crisis is Destabilizing Educators and Families.”

¹⁵ Rachel Stein, Megan Garay, and Anh Nguyen, “It Matters: Early Childhood Mental Health, Educator Stress, and Burnout,” Early Childhood Education Journal (2022), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9803254/>

¹⁶ National Association for the Education of Young Children, “Understanding the Realities of the Early Childhood Workforce,” available at <https://www.naeyc.org/ece-workforce-surveys>

¹⁷ Analysis of Data from National Association for the Education of Young Children, “A Year of Tough Choices”: The Child Care Affordability Crisis is Destabilizing Educators and Families” (2026), available at https://www.naeyc.org/sites/default/files/wysiwyg/user-174467/2026_survey_brief.pdf

- **Half** reported that access to employee benefits would make them extremely or very likely to stay in their roles;
- **64 percent** of Head Start program leaders reported the compensation they offer is too low to recruit and retain sufficient staff; and
- **74 percent** reported staff have taken on multiple roles in their program due to staffing challenges.

Without a well-compensated workforce, Head Start cannot meaningfully and sustainably deliver high-quality services to the families who need it the most.¹⁸ Research shows that the stability of the early educator workforce is positively related to overall classroom quality scores.¹⁹ The Department's proposed rule would backtrack on progress toward better Head Start staff support and improved retention, risking both reductions in quality and a reduction in the overall number of eligible children who can be served by the program.²⁰

III. Rescinding the 2024 rule will further increase staff turnover, impeding children's access to services, reducing their quality, and failing to address the underlying funding constraints that limit Head Start's ability to meet its mandate and purpose.

Overturing the 2024 rule risks undermining Head Start's mandate and purpose. The children and families who qualify for Head Start services are among those with the greatest need. The two-generational model of Head Start care has longstanding benefits to eligible families, including through mental health services, job supports, and home visiting, that help reduce household strain and improve parents' well-being. The program has also been found to boost educational attainment for participating young children, yielding higher earnings and improved health in adulthood, and even reduced reliance on the social safety net later in life.²¹ But families only see these benefits when they can actually access services.

Repealing protections for Head Start staff does not address the underlying funding constraints that are causing the spike in teacher turnover and classroom underenrollment. Inadequate access to Head Start slots is nearly universal, and that limited supply is even more pronounced

¹⁸ Delia Vicente, Melanie Venegas, and Alma Guerrero, "Turn-over and Retention Among Head Start Educators," *Early Childhood Education Journal*, 16 (53), available at <https://pmc.ncbi.nlm.nih.gov/articles/PMC12331161/>

¹⁹ Sharon Mims and others, "Education Level and Stability As It Relates to Early Childhood Classroom Quality: A Survey of Early Childhood Program Directors and Teachers," *Journal of Research in Childhood Education*, 23 (8), available at <https://www.tandfonline.com/doi/abs/10.1080/02568540809594657>

²⁰ First Five Years Fund, "Research Shows Low Pay is Associated with High Early Educator Turnover and Poor Student Outcomes," May 10, 2022, available at <https://www.ffyf.org/2022/05/10/research-shows-low-pay-is-associated-with-high-early-educator-turnover-and-poor-student-outcomes/>

²¹ Hailey Gibbs, "Debunking Myths About Head Start: How the Program Promotes Opportunity and Strengthens Families, Communities, and Economies," Center for American Progress, June 24, 2025, available at <https://www.americanprogress.org/article/debunking-myths-about-head-start-how-the-program-promotes-opportunity-and-strengthens-families-communities-and-economies/>

for vulnerable families in rural communities.²² Head Start plays a critical role as supportive infrastructure in rural communities, and without addressing the workforce shortage, many rural families will lose access to high-quality early education options. Head Start is also a crucial job provider for rural communities, and inadequate compensation driving educators and staff from programs diminishes Head Start programs' economic benefits to their surrounding communities.²³

Existing flexibility in the 2024 rule already allows grantees to implement waivers on the required wages provisions in the event of inadequate appropriations increases for the Head Start program, meaning grantees will not be forced to make tradeoffs between base wages increases and available slots for children and families, and Congress will be encouraged to fund the program at a level necessary to provide the wages and benefits increases necessary to stabilize the Head Start workforce.²⁴

Conclusion

Head Start is a proven, effective program that supports children's early learning and provides vulnerable families with critical supportive resources—but it depends on a stable, qualified workforce in order to provide those high-quality services. Removing protections for educators' wages while simultaneously failing to provide the necessary funding for the program to meet demand will only worsen widespread gaps in coverage for families in need of care, and risk further destabilizing other parts of the nation's child care system. Demanding workloads, low compensation and lack of benefits, and lack of professional recognition have all worked in tandem to strain the Head Start system and impede its ability to meet demand.²⁵

We share the goal of ensuring that as many children as possible are able to access high-quality Head Start programs, but we reject the premise that quality should be compromised. Head Start staff must be appropriately compensated for the program to remain high quality and fully enrolled. Removing the 2024 wage and benefits requirements does not increase flexibility, it simply shifts an untenable workforce crisis to local programs without the means to solve for it. Rather than rolling back the 2024 rule, the Administration should work with Congress to secure the funding needed to implement these requirements and address the real staffing challenges programs are facing, and to monitor the impact of these requirements on enrollment, rather than eliminating benchmarks around teacher pay and benefits. The 2024 regulations already offer flexibility to small Head Start agencies in meeting the wage and benefit standards, and allow the

²² Head Start deserts are defined as areas where available Head Start slots are outnumbered by children who qualify by poverty status by 3 eligible young children per local available slot; Hailey Gibbs and Casey Peeks, "America's Licensed Child Care Deserts," Center for American Progress, April 29, 2026, available at <https://www.americanprogress.org/article/americas-licensed-child-care-deserts/>

²³ Hailey Gibbs, "We Are the Resources': Head Start Is a Crucial Early Learning and Community Program for Families Nationwide," Center for American Progress, August 5, 2025, available at <https://www.americanprogress.org/article/we-are-the-resources-head-start-is-a-crucial-early-learning-and-community-program-for-families-nationwide/>

²⁴ Federal Register, "Supporting the Head Start Workforce and Consistent Quality Programming," August 21, 2024, available at <https://www.federalregister.gov/d/2024-18279/p-71>

²⁵ Xiangyu Zacho, Soeoyon Byun, and Lieny Jeon, "Head Start educators' professional well-being and their turnover intentions: the moderating role of perceived workplace discrimination," *Frontiers in Psychology*, 16 (16), available at <https://pmc.ncbi.nlm.nih.gov/articles/PMC12572940/>

Secretary to establish a waiver process for programs if appropriations increases are below an average of 1.3 percent annually for 4 years, if programs would otherwise have to reduce enrolled slots to implement requirements.

The removal of the 2024 wage and benefit provisions will not change the underlying fiscal pressures faced by Head Start programs. Operating costs continue to rise and teachers and staff continue to leave programs, limiting overall enrollment and access among some of the nation's most vulnerable families, particularly those in rural communities. Addressing the sustainability of the program requires both fair and meaningful compensation and benefits to its workforce and substantive funding increases through Congress. **We therefore urge OHS to rescind this proposed rule that would reverse efforts to bolster Head Start workforce pay and benefits, and protect the high-quality and stable workforce necessary to serve Head Start children and families as intended.**

Sincerely,

The Center for Law and Social Policy, the Center for American Progress, the National Association for the Education of Young Children, the National Women's Law Center, and the undersigned organizations

National Organizations

AFT

All Our Kin

American Academy of Pediatrics

American Friends Service Committee

Caring Across Generations

Child Care for Every Family Network

Children's Defense Fund

Coaching Potentials

Coalition on Human Needs

Division for Early Childhood of the Council for Exceptional Children (DEC)

Easterseals

Food Research & Action Center (FRAC)

Georgetown University Center for Children and Families

Kaplan Early Learning Company

MomsRising

National Association for Family Child Care (NAFCC)

National Council of Jewish Women

National Education Association

National Healthy Start Association (NHSA)

Parents Institute for Quality Education

Service Employees International Union (SEIU)

Spark Impact Strategies

TOOTRiS

United Parent Leaders Action Network (UPLAN)

Vote Mama Lobby

YWCA USA
ZERO TO THREE

State Organizations

Advance Illinois
Arkansas Early Childhood Association
California Association for the Education of Young Children (CAAEYC)
Child Care Law Center
CHILDREN AT RISK
Children's Advocacy Alliance
Children's Defense Fund - New York
Children's Defense Fund Minnesota
Children's Institute
Civic Leaders for Illinois Children
Common Good Iowa
Connecticut Early Childhood Alliance
Early Edge California
For All Families Oregon
Illinois Action for Children
Illinois Head Start Association
Institute for Child Success
Iowa Association for the Education of Young Children
KPATA
Maine Association for the Education of Young Children
Michigan Association for the Education of Young Children
Michigan Head Start Association
Michigan League for Public Policy
Minnesota Association for the Education of Young Children
New Futures
New Mexico Association for the Education of Young Children
North Carolina Institute for Child Development Professionals
North Carolina Partnership for Children
Parent Voices, California
Pennsylvania Association for the Education of Young Children
Pennsylvania Child Care Association
Pennsylvania Head Start Association
Prevent Child Abuse Illinois
Raising Illinois PN3 Coalition
Rhode Island Association for Infant Mental Health
Rhode Island KIDS COUNT
S.T.A.N.D. UP Minnesota Parents United
South Carolina Association for the Education of Young Children
Strategies for Children
The Children's Agenda

Voices for Vermont's Children
Washington Parent Ambassadors
Washington State Association of Head Start and ECEAP
We, the Village Coalition (WTV)
WEPOWER
West Virginia Family Child Care Network
Women Employed

Local Organizations

Aunt Di's Child Care Services
Austin/Travis County Success by 6
Beautiful Beginnings Child Car
Big Mama's Learning Academy, LLC
Brazelton Touchpoints Center, Boston Children's Hospital
Budding Readers, Inc.
CDA
Children First
Children's Community School
Children's Playhouse 2 LLC
Children's Village
Childspace Centers
Community School for People Under 6
CORA Services
DC Association for the Education of Young Children
East Boston Social Centers
Family Circle Academy
First 5 Tehama
First 5 Ventura County
First Up
Forever Young
Harambee Hope Learning Center LLC
Harmon & Harmon Family Childcare
Head Start of Lane County
Heavenly Daycare and Learning Center Inc
Hoosier Uplands EDC Head Start
John Bartram High School
Kencrest Services Early Learnings South Center
LifeSpan School & Daycare
Little Bear Family LLC
Little Darlings
Little People's Village
Opportunity School
Parent Infant Center
Parents Leading for Educational Equity

Pratt Street Learning Center

Saint Mary's Nursery School

SAL Community Services

SPIN

Tiny Hearts Family Childcare

Tiny Tots Child Development Center

Trying Together

Turn the Page STL

United Way of Salt Lake

Wisconsin Early Childhood Association

Woonsocket Head Start Child Development Association, Inc.