



June 11, 2026

The Honorable Robert F. Kennedy Jr.
Secretary, United States Department of Health and Human Services

Federal Register Document Number: ACF-2026-0364 / RIN 0970-AD21

Re: *Restoring Flexibility To Support Head Start Program Access*

Dear Secretary Kennedy:

Head Start is a vital early education and comprehensive family support program serving some of the nation's most vulnerable families. Recognized for providing high-quality care that combats poverty and improves life outcomes, Head Start's success depends on a stable, qualified workforce. But with no meaningful increases in compensation in at least three years, Head Start is plagued by frequent turnover, underenrollment, and insufficient support for the early educators and staff performing its critical work. The 2024 rule passed under the Biden administration was established specifically to ensure fair wages and benefits to retain these essential educators and ensure the program is best able to meet its statutory mandate and purpose.

Rolling back the provisions included in the 2024 rule, as the current notice proposes, will only further destabilize an already vulnerable early education sector, leading to greater attrition among early educators, and the potential loss of services to children and families. For these reasons, **we urge the Department of Health and Human Services to revoke the 2025 rule – *Restoring Flexibility To Support Head Start Program Access*– reinstate the 2024 rule, and call for:**

1. The administration to work with Congress to secure sufficient public funding for the Head Start program to support access, and sustainability;
2. Fairly compensating Head Start educators and staff with meaningful wage increases and benefits as a matter of retention and supply, particularly in hard-hit rural communities;
3. Protecting the high standards for which Head Start is known and which underlie its programmatic success.

The remainder of this document provides additional details and relevant supporting literature. Thank you for your time and consideration.

Sincerely,

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Introduction and Background

The Head Start program serves nearly 800,000 kids from low-income households nationwide as a critical two-generation resource for vulnerable children and their families.¹ The 2024 rule² – *Supporting the Head Start Workforce and Consistent Quality Programming* – was developed on the basis of research and feedback from the Head Start community regarding poor wages and compensation for early educators and support staff which contribute to high rates of turnover, diminishing the quality of services the program can provide, and leading to broader challenges with program enrollment.

The 2025 rule³ would remove the requirement to develop a pay scale that would provide Head Start educators with a salary commensurate with that of public preschool teachers and which would cover basic costs of living and would remove the requirements to provide full-time Head Start staff with health care coverage, paid leave, and behavioral health services; to help part-time staff access health care coverage and help eligible staff access child care subsidies and student loan forgiveness; and to reassess compensation and benefits on a regular basis as costs across the economy rise.

The Center for American Progress—an independent, nonpartisan policy institute that is dedicated to improving the lives of all Americans—is deeply concerned that the administration’s proposed regulatory changes will overturn vital improvements to compensation, further destabilizing the Head Start workforce. For three years, stagnant funding has failed to address rising overhead or the need for better pay and benefits, even as the FY2027 proposal ignores chronic staffing gaps caused by low wages. These funding shortfalls, coupled with administrative failures—including regional office closures⁴ and delayed grant cycles—create a climate of uncertainty that undermines teacher recruitment and program stability.

1. Insufficient public funding for Head Start is the true culprit behind educator turnover, limited access, and program sustainability.

Eliminating wage and benefit mandates does not address the core issue of insufficient public funding for the Head Start program—which must be provided by Congress through the appropriations process. Rather, it places the responsibility on local grantees to navigate an

¹ Casey Peeks and Allie Schneider, “5 Things to Know About Head Start” (Washington, Center for American Progress: 2025), available at <https://www.americanprogress.org/article/5-things-to-know-about-head-start/>

² Federal Register, “Supporting the Head Start Workforce and Consistent Quality Programming” August 21, 2024, available at <https://www.federalregister.gov/documents/2024/08/21/2024-18279/supporting-the-head-start-workforce-and-consistent-quality-programming>

³ 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>

⁴ 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/>

untenable financial environment without sufficient support. And despite the claims that requiring higher wages for Head Start educators negatively impacts a grantee's ability to provide for necessary slots for eligible children, far more families are impacted by the inability for that program to retain a classroom educator, resulting in classroom closures and funded slots remaining unfilled—which affect not only Head Start enrollees, but other non-participating children in classrooms in-part funded by Head Start dollars.

Families are presented with a false choice by the rule's focus on "access." Sacrificing quality for slot retention is not a genuine solution, nor will a failure to compensate early educators result in greater access. The rule argues that without rescission, programs would need to cut up to 106,000 slots. But this framing treats inadequate federal funding as a fixed constraint rather than a policy choice. Increasing compensation and providing a cost of living adjustment in line with inflation is critical to recruiting and retaining a qualified workforce and providing high-quality services.

Given the current landscape of stagnant funding, administrative delays, and instability, this regulatory change for the program will only further undermine the workforce, increase pay inequities, and hinder the ability of programs to attract qualified personnel, deepening issues with program enrollment. Ultimately, inadequate compensation acts as a barrier to Head Start access and the long-term viability of the program because it exacerbates turnover among early educators and worsens existing supply shortages.

According to the National Association for the Education of Young Children's annual Early Childhood Education workforce surveys, low compensation is the key driver of early educator turnover, fueling the child care supply shortage even as some classrooms sit empty.⁵ Paradoxically, despite widespread unmet demand, Head Start also faces unused capacity: 13 percent of funded slots across Head Start and Early Head Start remain unfilled even with eligible families sitting on waitlists. Staffing shortages are a primary driver of this paradox: insufficient compensation leaves programs struggling to recruit and retain qualified staff, leaving vacancies unfilled and families without services.⁶

Of Head Start staff reporting under-enrollment in their programs, 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.⁷ Fifty-one percent reported that their staff turnover had increased in the past year, and 54 percent reported increasing difficulty with retention. Sixty-four percent of Head Start program leaders reported the compensation they offer is too low for both recruitment and retention.

⁵ 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>

⁶ Morgan Healy, Rachel Fidel, W. Steven Barnett, "The Real Cost of Rolling Back Head Start Wage Requirements," National Institute for Early Education Research, June 4, 2026, available at <https://nieer.org/research-library/real-cost-rolling-back-head-start-wage-requirements>

⁷ National Association for the Education of Young Children, "'A Year of Tough Choices': The Child Care Affordability Crisis is Destabilizing Educators and Families," available at https://www.naeyc.org/sites/default/files/wysiwyg/user-174467/2026_survey_brief.pdf

Workforce shortages are not a hypothetical future risk — they are happening now. In October 2023, 15 percent of Head Start classrooms were closed due to staffing shortages, affecting service delivery to children and families.⁸ Removing the benefits requirements eliminates the regulatory floor designed to stabilize that workforce, threatening the very program access the rule claims to protect. Early educators across the United States' child care sector are among the lowest paid in the nation's economy, and nearly half rely on some form of public assistance, such as Medicaid or SNAP.⁹ As health care and food costs continue to rise, early educators—including those employed by Head Start—will be forced to seek employment in jobs that can and do offer these essential workplace benefits.

Eliminating wage and benefit requirements will deepen workforce instability and classroom closures that already deny families reliable access. Without a valued and adequately compensated workforce, Head Start cannot meaningfully and reliably deliver essential services to the families who need it the most. Early educators play a foundational role in the quality of the early education and family support services that Head Start can provide.¹⁰ In fact, research shows that the stability of the early educator workforce is positively related to overall classroom quality scores.¹¹ Research has found that higher rates of teacher turnover are associated with poorer child outcomes, including slower language development, weakened attachment, and poorer self-regulation skills.¹² Without supporting and retaining Head Start teachers, greater attrition will lead to both reductions in quality and reduction in the overall number of eligible children who can be served by the program.¹³

2. CAP promotes fairly compensating Head Start educators and staff with meaningful wage increases and benefits as a matter of retention and supply, particularly in hard-hit rural communities.

The nation's child care system suffers both a crisis of affordability and a crisis of supply. Head Start has not been spared these issues. Due to chronic underfunding, Head Start already

⁸ 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>

⁹ Georgetown Center for Children and Families, "Medicaid is a Critical Support for the Early Childhood Education Workforce," available at <https://ccf.georgetown.edu/2025/04/21/medicaid-is-a-critical-support-for-the-early-childhood-education-workforce/>

¹⁰ Delia Vicente, Melanie Venegas, and Alma Guerrero, "Turn-over and Retention Among Head Start Educators," *Early Childhood Education Journal*, 53 (5), available at <https://pmc.ncbi.nlm.nih.gov/articles/PMC12331161/>

¹¹ 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 Child Education*, 23 (2), available at <https://www.tandfonline.com/doi/abs/10.1080/02568540809594657>

¹² Anna Markowitz, "Within-Year Teacher Turnover in Head Start and Children's School Readiness," *American Educational Research Association*, May 6, 2024, available at <https://journals.sagepub.com/doi/10.1177/23328584241245094>

¹³ First Five Years Fund, "Research Shows Low Pay is Associated with High Early Educator Turnover and Poor Student Outcomes," available at <https://www.ffyf.org/2022/05/10/research-shows-low-pay-is-associated-with-high-early-educator-turnover-and-poor-student-outcomes/>

struggles to reach all eligible children in poverty—in 2024 just over one-third of qualifying children were enrolled in Head Start, and just 11 percent in Early Head Start.¹⁴ Inadequate access to Head Start slots is nearly universal, and that limited supply is even more pronounced for vulnerable families in rural communities. 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’s economic benefits.

96.7 percent of young children who qualify by poverty status live in rural areas with insufficient Head Start access compared to 99.7 percent of qualifying young children in urban areas, but the distribution of access varies considerably by geography.¹⁵ Whereas 20 percent of qualifying young children in urban areas have no Head Start access, the same is true for nearly half of those in rural areas. In rural communities, only 2.7 percent of eligible young children have sufficient access to Head Start slots, whereas in urban areas, that figure drops to less than 1 percent.¹⁶

In rural America, Head Start is a backbone for supportive social and early learning infrastructure.¹⁷ While supply gaps exist everywhere, the program’s footprint is largest in rural congressional districts, which contain 45.9 percent of all funded slots, far exceeding the shares in suburban (31.6 percent) and urban (22.4 percent) areas. For high-need families in these rural communities, Head Start is sometimes the only available licensed child care option. Furthermore, the program strengthens the broader early learning landscape through Head Start-Child Care partnerships. These collaborations allow providers to offer stable, continuous care that fosters school readiness and enhances the wellbeing of eligible families.

Eligible Head Start families are among the most vulnerable: primarily those living in poverty. The program’s two-generation approach offers enduring advantages through home visits, mental health assistance, and employment support, which collectively bolster parental health and alleviate domestic stress. Research indicates that Head Start also enhances academic success for participating young children, leading to increased earnings in adulthood, better health outcomes, and a decreased dependency on transfer programs in the long term.¹⁸ However, these transformative benefits are out of reach to families who cannot access the program.

¹⁴ Morgan Healy, Rachel Fidel, W. Steven Barnett, “The Real Cost of Rolling Back Head Start Wage Requirements.”

¹⁵ Hailey Gibbs and Casey Peeks, “America’s Licensed Child Care Deserts” (Washington, Center for American Progress: 2026), available at <https://www.americanprogress.org/article/americas-licensed-child-care-deserts/>

¹⁶ Ibid.

¹⁷ Casey Peeks and Allie Schneider, “5 Things to Know About Head Start,” Center for American Progress, available at <https://www.americanprogress.org/article/5-things-to-know-about-head-start/>

¹⁸ Hailey Gibbs, “Debunking Myths About Head Start: How the Program Promotes Opportunity and Strengthens Families, Communities, and Economies,” Center for American Progress, available at <https://www.americanprogress.org/article/debunking-myths-about-head-start-how-the-program-promotes-opportunity-and-strengthens-families-communities-and-economies/>

3. CAP promotes protecting high standards for which Head Start is known and which underlie its programmatic success.

Educators in Head Start have consistently risen to meet increasing professional standards as the program has evolved over time. Following the bipartisan 2007 Congressional mandate requiring half of the national teaching workforce to hold a bachelor's degree, Head Start surpassed expectations, with 75 percent of teachers now meeting that requirement. Despite these heightened qualifications and growing duties, compensation has stagnated. On average, Head Start lead teachers earn between just over \$46,000 per year—a rate that, when adjusted for inflation, has not seen a meaningful increase since 2013.¹⁹ This salary remains significantly lower than the \$60,000-\$70,000 average earned by public school kindergarten teachers. Among Head Start educators with a bachelor's degree, that margin of difference exceeds two-thirds, meaning equally-qualified Head Start teachers earn just 64 percent of an average public school teacher's salary.²⁰ And despite a marginal increase in FY2026 appropriations, Head Start teachers have seen an estimated \$0.65 average increase in wages to adjust for cost of living—hardly sufficient in the face of steeply rising costs across the economy.

The consequences of inadequate pay and workforce instability directly impact children and their families. Local programs frequently find it impossible to attract and keep qualified staff on current budgets. Consequently, veteran educators often transition to better-paying roles in public schools or industries like retail and food service, all of which have seen faster wage growth than the early childhood sector.²¹ Furthermore, when staff depart, programs are forced to reallocate scarce funds toward recruitment and onboarding, often resulting in vacant positions or complete classroom closures. And states with the largest margins between their Head Start teachers' salaries and those of K-12 educators also tend to reach the fewest eligible children.²² Such high turnover rates also fracture the consistent, nurturing bonds essential for child development and meaningful family partnerships, and negatively impact the overall program quality for which Head Start is known.

Early childhood research consistently shows that the most significant factor in a high-quality environment is the quality of interaction between teachers and the children in their care, making educators the cornerstone of the Head Start model, and their meaningful compensation foundational to Head Start meeting its statutory purpose and mandate to provide high-quality services to the vulnerable families who rely on the program.

¹⁹ Morgan Healy, Rachel Fidel, W. Steven Barnett, "The Real Cost of Rolling Back Head Start Wage Requirements."

²⁰ Ibid.

²¹ Center for the Study of Child Care Employment, "Early Educator Pay & Economic Insecurity Across the States," available at <https://cscce.berkeley.edu/workforce-index-2024/the-early-childhood-educator-workforce/early-educator-pay-economic-insecurity-across-the-states/>

²² Morgan Healy, Rachel Fidel, W. Steven Barnett, "The Real Cost of Rolling Back Head Start Wage Requirements."

Conclusion

Head Start programs reach families who benefit most from comprehensive support, including those experiencing homelessness, foster care, or significant economic hardship. Consequently, educators now serve a diverse population with a broad range of developmental needs, supporting an increasing number of children with disabilities, developmental delays, and behavioral support requirements. This complex, highly skilled work demands that teachers excel at individualizing instruction, fostering responsive relationships, and collaborating with families and specialists to create inclusive settings. To ensure every eligible child has access to Head Start services and can thrive, these essential responsibilities must be supported by stable working conditions and professional compensation.

It is critical that federal policy and budget priorities focus on raising wages and improving benefits for Head Start personnel. The Administration must partner with Congress to secure the funding required to provide Head Start teachers with competitive and equitable pay and benefits. In the absence of significant investment and a dedicated focus on workforce stability, Head Start programs will remain susceptible to disruptions that negatively impact the families and children they serve.