



1201 16th St., N.W. | Washington, DC 20036 | Phone: (202) 833-4000

Rebecca S. Pringle  
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Kim A. Anderson  
*Executive Director*

June 11, 2026

Submitted via Regulations.gov

Robert F. Kennedy, Jr.  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Ave SW  
Washington, DC 20201

***Re: ACF-2026-0364; Restoring Flexibility to Support Head Start Program Access***

Dear Secretary Kennedy:

On behalf of the approximately 3 million members of the National Education Association (NEA), including early childhood educators and education support professionals working in public schools and early learning settings across the country, **we submit these comments in strong opposition to the Department of Health and Human Services (HHS) proposed rule, *Restoring Flexibility to Support Head Start Program Access*, published in the Federal Register on May 12, 2026.**

The proposed rule would dismantle critical workforce protections established in the 2024 Head Start Final Rule and reverse important progress toward addressing longstanding recruitment and retention challenges in the Head Start workforce. By weakening standards designed to improve compensation, stability, and workforce quality, the proposal threatens the very foundation of Head Start's success: a skilled, qualified, and supported workforce capable of meeting the developmental and educational needs of young children and their families.

NEA's membership includes thousands of Head Start educators employed by local school districts that serve as Head Start and Early Head Start grantees. These educators work every day to ensure that children from families with low incomes receive high-quality early learning experiences, comprehensive services, and family supports that are the hallmark of the Head Start program.

The Department should also recognize that the proposed rule is inconsistent with the findings that supported adoption of the 2024 Head Start Final Rule. In the final language of the 2024 rule, HHS concluded that workforce shortages, low wages, inadequate benefits, and staff turnover posed significant threats to the sustainability and quality of Head Start programs. The Department

specifically found that strengthening wages and benefits was necessary to improve recruitment and retention, stabilize the workforce, and ensure consistent quality programming for children and families.<sup>1</sup> HHS further acknowledged that many programs were struggling to maintain staffing levels and, in some cases, were forced to close classrooms because they could not recruit and retain qualified educators. The proposed rollback offers no evidence that these challenges have been resolved and provides no basis for reversing the Department’s previous determination that workforce stability is essential to program quality.<sup>2</sup>

### ***The Importance of a Qualified and Stable Head Start Workforce***

For decades, NEA has advocated for a highly qualified early childhood workforce and has consistently maintained that every child deserves access to educators with specialized expertise in child development, early learning, family engagement, and effective instructional practice. Research consistently demonstrates that educator qualifications, preparation, and expertise are among the strongest predictors of program quality and children’s educational outcomes.<sup>3</sup>

Children who participate in high-quality early childhood programs are more likely to enter kindergarten ready to learn, perform better academically, require fewer remedial services, and experience improved long-term educational and economic outcomes.<sup>45</sup> Conversely, policies that weaken educator qualifications, reduce workforce supports, or permit chronic compensation inequities undermine instructional quality and disproportionately harm children from low-income families who rely most heavily on Head Start Services.<sup>6</sup>

The proposed rule also echoes earlier efforts to weaken Head Start standards by prioritizing administrative flexibility over program quality and workforce stability. Head Start’s effectiveness has always depended on maintaining strong standards that support qualified educators, stable learning environments, and meaningful relationships between children and caregivers. Weakening these standards risks undermining the very factors that research identifies as essential to positive child outcomes.

### ***Compensation Inequities Continue to Drive Workforce Instability***

The success of Head Start has always depended on its commitment to quality. Over time, Congress and successive administrations have strengthened educator qualification requirements because children benefit when they are taught by well-prepared professionals. Today, Head Start educators

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<sup>1</sup> <https://www.federalregister.gov/documents/2024/08/21/2024-18279/supporting-the-head-start-workforce-and-consistent-quality-programming>

<sup>2</sup> <https://www.federalregister.gov/documents/2024/08/21/2024-18279/supporting-the-head-start-workforce-and-consistent-quality-programming>

<sup>3</sup> <https://journals.sagepub.com/doi/10.3102/0034654319837540>

<sup>4</sup> <https://nces.ed.gov/learn/blog/short-and-long-term-impacts-high-quality-early-childhood-education-programs>

<sup>5</sup> <https://pmc.ncbi.nlm.nih.gov/articles/PMC10524717/>

<sup>6</sup> <https://www.americanprogress.org/article/closures-of-head-start-regional-offices-jeopardize-critical-services-for-children-and-families/>

are more highly credentialed than at any point in the program’s history, reflecting decades of bipartisan efforts to strengthen the profession and improve outcomes for children and families.

However, increasing expectations without addressing compensation has created persistent workforce challenges. Head Start educators frequently earn substantially less than similarly credentialed public school educators serving children of comparable ages and needs. Many Head Start educators employed by school district grantees work alongside public school preschool and kindergarten teachers yet continue to experience significant salary disparities.

National workforce analyses have found that Head Start lead teachers earn, on average, between \$30,000 and \$40,000 annually, compared with approximately \$63,000 for similarly credentialed kindergarten teachers in public schools.<sup>7</sup> Inflation-adjusted wages for many Head Start educators have remained largely stagnant for more than a decade.<sup>8</sup>

The 2024 Final Rule was specifically designed to address these longstanding compensation disparities. The Department recognized that Head Start programs were increasingly unable to compete with public schools and other early childhood employers for qualified educators and that low compensation was contributing directly to staff vacancies and turnover. HHS emphasized that strengthening wages and benefits was necessary to place Head Start on a sustainable path by reducing turnover, improving recruitment, and supporting high-quality services for children and families.

The evidence is clear: compensation disparities are a primary driver of turnover and workforce instability.<sup>9</sup> Many Head Start educators leave not because they wish to leave the profession, but because they cannot afford to remain in it. High turnover disrupts continuity of care, weakens instructional quality, and diminishes the stable relationships that are essential to young children’s learning and development.

### ***Weakening the 2024 Workforce Provisions Would Harm Children and Families***

The Department’s proposal fails to explain why it is abandoning the factual findings that justify the 2024 workforce protections. The Final Rule was adopted because HHS determined that workforce instability, compensation inequities, and chronic staffing shortages were undermining Head Start’s ability to deliver consistent, high-quality services. The Department concluded that stronger wages and benefit standards were necessary to stabilize the workforce and improve program quality. The current proposal offers no evidence that these workforce challenges have been resolved. To the contrary, recruitment and retention difficulties continue to affect Head Start programs nationwide.<sup>10</sup>

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<sup>7</sup> <https://www.urban.org/research/publication/head-start-and-early-head-start-teacher-salaries>

<sup>8</sup> <https://www.cleveland.com/news/2023/12/federal-government-proposes-head-start-teacher-salary-boost.html>

<sup>9</sup> <https://fpg.unc.edu/publications/longitudinal-study-head-start-teacher-turnover-trends-and-factors>

<sup>10</sup> <https://www.federalregister.gov/documents/2024/08/21/2024-18279/supporting-the-head-start-workforce-and-consistent-quality-programming>

Reversing workforce protections under these circumstances risks exacerbating the very problems the Department previously identified as threats to the long-term sustainability of the program.

Research consistently demonstrates that inadequate compensation and unstable working conditions contribute to higher rates of educator turnover, which in turn are associated with lower instructional quality, weaker language and literacy outcomes, diminished social-emotional development, and reduced school readiness.<sup>11</sup> When experienced educators leave, children lose stable, trusting relationships that are foundational to early learning and kindergarten readiness.

For children, the consequences are immediate and significant. Young learners thrive when they experience stable, nurturing relationships with skilled educators. Frequent staff turnover disrupts those relationships and limits opportunities for individualized support during a critical period of development.<sup>12</sup>

For educators, weakening workforce standards exacerbate financial insecurity, burnout, and career instability. For programs, it undermines efforts to attract and retain qualified professionals. For families, it threatens access to the high-quality services that have defined Head Start for more than 60 years.

Lowering standards and weakening compensation protections will not solve workforce shortages. Instead, it will accelerate attrition, widen inequities, and reduce program quality nationwide. Such a policy reversal would leave programs less able to meet the needs of children and families, particularly in communities already facing severe shortages of qualified early childhood educators.<sup>13</sup>

### ***Conclusion***

For these reasons, **NEA strongly urges HHS to withdraw the proposed rule and retain the workforce protections established in the 2024 Head Start Final Rule.** The Department previously determined, based on extensive public comments and substantial evidence, that stronger wages, benefits, and workforce standards were necessary to addressing staffing shortages, improve recruitment and retention, and ensure consistent quality programming. Those findings remain valid today.

Head Start's effectiveness depends on the ability of the programs to attract and retain qualified educators who can build the stable, nurturing relationships that young children need to thrive. Weakening workforce protections will not increase access to high-quality services; it will make it more difficult for programs to recruit and retain the professionals upon who quality depends. Rather than reversing course, HHS should continue advancing policies that strengthen the workforce,

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<sup>11</sup> <https://cscce.berkeley.edu/wp-content/uploads/2022/04/Early-Childhood-Workforce-Index-2018.pdf>

<sup>12</sup> <https://files.eric.ed.gov/fulltext/ED671968.pdf>

<sup>13</sup> <https://nhsa.org/resource/confronting-head-starts-workforce-crisis/>

promote compensation parity, improve benefits, and support the long-term sustainability of Head Start.

The federal government has invested decades in strengthening Head Start educator qualifications and program standards. The proposed rule would jeopardize that progress and diminish the return on that investment. Children, families, and communities deserve a stronger commitment to quality, not a retreat from it.

Thank you for the opportunity to comment on this proposed rulemaking. Please do not hesitate to contact me or Shyrelle Eubanks at [ShEubanks@nea.org](mailto:ShEubanks@nea.org) should you have questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Daaiyah Bilal-Threats". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Daaiyah Bilal-Threats  
Senior Director, Education Policy and Implementation Center  
National Education Association