HEAD START WEST
Elevating the Head Start Community™

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June 11, 2026

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

Re: Comment on NPRM Entitled "Restoring Flexibility to Support Head Start Program Access"

Dear Secretary Kennedy:

Thank you for the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) entitled "Restoring Flexibility to Support Head Start Program Access." On behalf of Region 9 Head Start Association, doing business as Head Start WEST, representing Head Start grantees across Arizona, California, Hawaii, Nevada, and the Pacific Territories, I respectfully urge the Department to retain the existing wage and benefit provisions and to prioritize increased federal investment in compensation for the Head Start workforce.

The central challenge facing Head Start programs today is not excessive regulation—it is an ongoing workforce crisis driven by inadequate compensation and growing instability. Rescinding wage and benefit requirements will not improve access to Head Start services. Rather, it risks accelerating staff turnover, worsening recruitment challenges, and reducing the capacity of programs to serve eligible children and families.

For the past three years, Head Start programs have received no meaningful funding increases to address rising personnel costs, inflation, and growing service demands. Most recently, the Administration proposed level funding for FY 2027 despite increasing operating expenses, persistent workforce shortages, and heightened expectations for program quality and comprehensive services. At the same time, delays in funding decisions, late grant competitions, and limited communication associated with regional office closures have created significant uncertainty throughout the Head Start community.

Programs have experienced temporary closures and, in some cases, have been forced to issue layoff notices when federal funding has been delayed. Even now, thousands of Head Start employees remain in limbo as Notices of Funding Opportunity (NOFOs) for service areas undergoing Designation Renewal System (DRS) competitions remain delayed by more than six months. These circumstances undermine workforce stability and make it increasingly difficult to recruit and retain qualified educators and support staff.

The consequences of low compensation are clear. Programs throughout our region struggle to recruit and retain qualified teachers. Experienced educators frequently leave Head Start for higher-paying positions in public schools, retail and fulfillment centers, food service, and other sectors that offer more competitive wages and benefits. The National Head Start Association's 2025 workforce survey found that compensation remained the leading cause of staff vacancies, with 71 percent of programs identifying inadequate compensation as a primary barrier to recruitment and retention. This finding underscores what local

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grantees have experienced for years: compensation is the primary barrier to building and sustaining a qualified workforce.

When staff leave, programs lose valuable expertise, children lose continuity of care and instruction, and families lose trusted relationships. Programs must then divert scarce resources toward recruitment, hiring, and training while vacancies remain unfilled. In some cases, classrooms close entirely due to insufficient staffing.

These workforce shortages directly reduce access to Head Start services. Programs cannot serve children without qualified staff. Across the country, agencies have been forced to reduce enrollment, close classrooms, or limit services because they cannot attract and retain educators at current compensation levels. At the same time, recent workforce data demonstrate that progress is possible when vacancies are reduced. Over the past three years, as programs have gradually filled vacant positions, the number of closed classrooms and the rate of under enrollment have declined markedly. This relationship highlights a simple reality: when programs can recruit and retain qualified staff, they are able to serve more children and families. Workforce stability is therefore essential to expanding and maintaining access to Head Start services.

Head Start educators are the foundation of the program's success. Decades of research consistently demonstrate that the quality of interactions between children and teachers is among the strongest predictors of positive developmental outcomes. Today's Head Start workforce serves children with a wide range of developmental strengths and needs, including increasing numbers of children with disabilities, developmental delays, behavioral support needs, and histories of homelessness, foster care, or other adverse experiences. Educators are expected to individualize instruction, foster strong relationships with children and families, collaborate with specialists, and create inclusive learning environments where every child can thrive.

This is highly skilled professional work.

As Head Start has evolved, educators have continually met increasing expectations. In 2007, Congress established a requirement that at least half of Head Start teachers nationwide hold bachelor's degrees. The workforce exceeded that benchmark, with approximately three-quarters of teachers ultimately attaining bachelor's degrees. Yet compensation has failed to keep pace with these increased qualifications and responsibilities. Head Start lead teachers earn an average annual salary of approximately $40,000—effectively unchanged since 2013 after adjusting for inflation. By comparison, kindergarten teachers in public schools earn approximately $63,000 annually.

The gap between the qualifications expected of Head Start educators and the compensation they receive illustrates why workforce shortages persist. Without competitive wages and benefits, programs will continue to struggle to attract and retain the highly qualified professionals needed to serve children and families effectively.

Rescinding wage and benefit requirements does not address this reality. Eliminating these standards creates no new resources for programs and does nothing to improve recruitment or retention. Instead, it places

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local grantees in the untenable position of managing workforce shortages without adequate federal support. In the current environment of flat funding, delayed grants, and administrative uncertainty, removing these standards would likely increase compensation disparities, further weaken workforce stability, and make it even harder for programs to compete for qualified staff.

Importantly, many Head Start agencies have already implemented compensation and benefit improvements consistent with the current requirements. With support from the Office of Head Start, these agencies have reported positive results, including reduced turnover, improved retention, stronger staff morale, and increased enrollment capacity. These experiences demonstrate that strengthening compensation works. The current policy framework has encouraged investments that benefit staff, children, and families alike.

The NPRM suggests that rescinding wage and benefit requirements will provide greater local flexibility. In practice, flexibility without sufficient funding offers little value. Local programs cannot solve a national workforce crisis through flexibility alone. What Head Start programs need is sustained federal investment that enables them to offer competitive wages and benefits and build a stable, qualified workforce.

We therefore urge the Department to withdraw the proposed rescission of wage and benefit requirements and instead work with Congress to provide the funding necessary to strengthen the Head Start workforce. This includes making meaningful progress toward compensation parity with kindergarten teachers in public schools and supporting comprehensive benefits that promote recruitment and retention.

Without meaningful investment in compensation and workforce stability, Head Start programs will continue to face avoidable disruptions that ultimately affect the children and families they are designed to serve. By contrast, strengthening compensation will improve recruitment, retention, program quality, and access—advancing the very goals this NPRM seeks to achieve. Recent national data demonstrate that reducing workforce vacancies leads directly to fewer classroom closures and lower rates of under enrollment, making workforce investment one of the most effective strategies for expanding access to Head Start services.

We respectfully call on the Administration and Congress to strengthen, rather than weaken, the workforce policies that support Head Start and to make the investments necessary to recruit, retain, and sustain a qualified workforce. With adequate investment and a stable workforce, Head Start programs can continue providing exemplary services to children and families today, tomorrow, and for generations to come.

Sincerely,

Edward Condon
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