



50 F Street NW
Suite 740
Washington, DC 20001

202.730.0943
FFYF.org
Mail@FFYF.org

June 9, 2026

Office of Head Start
Attn: Director of Policy and Planning
330 C Street SW, 4th Floor
Washington, DC 20201

Re: Comments on Restoring Flexibility to Support Head Start Program Access
ACF-2026-0364, RIN 0970-AD21

To Whom It May Concern:

These comments are submitted on behalf of the First Five Years Fund (FFYF) in response to the Notice of Proposed Rulemaking (NPRM), *Restoring Flexibility to Support Head Start Program Access*, published by the Office of Head Start (OHS) on May 12, 2026. FFYF works to protect, prioritize, and build support for early learning and child care programs at the federal level. Our primary goal is to align best practices with the best possible policies, and as the leading child care advocacy organization working with policymakers on both sides of the aisle, we strive to find solutions that maintain long-term bipartisan support for federal early learning and care programs.

As noted in the NPRM, throughout its 61-year history, Head Start has been a leader in providing high-quality, comprehensive services for children from low-income families, and a wealth of evidence supports the positive outcomes for Head Start children and their families. Among federal early learning programs, Head Start is unique in its ability to meet the specific needs of a community while adhering to the high standards outlined in the Head Start Program Performance Standards (HSPPS). We consider this community-driven approach to be a [core element](#) of Head Start's success, and we appreciate ACF's commitment to protecting local flexibility and improving access to Head Start for eligible children and families.

FFYF does not believe the federal government mandating wages is the solution to the workforce issues facing Head Start, and we support the principle that Head Start grantees should have the flexibility to make wage and benefit decisions that reflect their local labor markets and community contexts. At the same time, we would be

remiss not to raise the workforce challenges that have been building across the Head Start program for years and that this proposed rule does not resolve. Head Start grantees operate entirely on fixed federal grants with no ability to generate independent revenue or adjust their budgets in response to market conditions. As a result, compensation decisions, however locally made, are ultimately constrained by federal funding levels. As with our previous comments in 2024, our NPRM response and recommendations here encourage the Administration and Congress to consider how reauthorization and the annual appropriations process can better equip grantees to attract and retain qualified staff, so that the flexibility this rule restores can be meaningfully exercised.

The success of the Head Start program cannot be separated from the dedicated, well-trained educators and staff who integrate early education with essential supports for children's health, development, and family well-being. Staff consistency is essential to building trusting relationships with both children and parents, following a child's development and learning over time, and responding to emerging needs. Yet chronic low pay and lack of basic benefits continue to drive early educators out of the field and into better-compensated positions elsewhere. The wage gap is significant and well-documented. According to the Urban Institute, Head Start Preschool classroom teachers with a bachelor's degree in early childhood education or a related field, the same credential required of public-school teachers, earn an average salary of \$40,913, while those with an associate degree average \$33,566. More than half of all Head Start Preschool center-based teachers (56%) hold a bachelor's degree yet earn roughly \$25,000 to \$30,000 less annually than their kindergarten counterparts, whose average salary grew from \$63,600 in 2024 to \$66,800 in 2025 according to RAND. This disparity exists despite comparable, if not more demanding, professional responsibilities.

In response to the 2024 proposed rule during the last administration, FFYF cautioned that additional funding would be needed to ensure programs could meet quality standards, fairly compensate the workforce, respond to community needs, and address other outstanding challenges. Absent new appropriations, grantees would face difficult tradeoffs between implementing the wage and benefit requirements and maintaining enrollment, a concern we raised at the time and continue to hold. This proposed rule argues that rescinding those requirements will preserve as many as 106,000 Head Start slots, but an important distinction must be made. Reduction in enrollment predates the 2024 rule; in many instances, classroom closures are driven by insufficient staff, and grantees have long struggled to offer competitive wages and

benefits in the face of rising costs for food, facilities, and transportation, against a backdrop of largely level funding.

In 2023, a National Head Start Association (NHSA) survey found that salary and benefits were cited as the top reason nearly 1 in 5 staff positions were vacant nationwide. Of the 20% of classrooms that were reported as closed across the country, 81% of those closures were due to staffing vacancies. It is not possible to preserve slots that are already functionally unavailable due to ongoing staffing issues. The estimates in the NPRM also assume a static workforce that will remain in place under the status quo, an assumption directly contradicted by available data. Staff turnover reached 17% in 2023, up from 13.5% in 2019. A 2026 NHSA survey found that while the workforce crisis has stabilized somewhat in the last few years, that stabilization often comes at the cost of serving fewer children. A funded slot with no teacher to fill it is not a slot; it is a number on a spreadsheet. Even without a federal requirement, programs will find it necessary to invest in wages and benefits to remain operational, meaning that eliminating the requirement neither guarantees savings nor ensures the estimated 106,000 slots will be preserved.

For too long, the Head Start program has relied on staff paid poverty-level wages. For a single adult with one child, median child care worker pay does not meet a living wage in any state. Head Start's mission is to serve the lowest-income families in America, yet the people delivering that mission are themselves frequently low-income. As of 2022, nearly a quarter of Head Start's 260,000 staff were parents of current or former Head Start children. These early childhood educators are members of the very communities Head Start exists to serve.

FFYF recognizes the serious fiscal concerns underlying this proposed rule, and we understand the real constraints programs face in the absence of additional appropriations. We also remain very concerned about the size and quality of the Head Start workforce as teachers continue to migrate to public preschool and K–12 systems that are actively raising wages. Staff vacancies translate directly into classroom closures and reduced access for the lowest-income children the program is designed to serve, an outcome that undermines the very goal of protecting enrollment that this NPRM seeks to advance.

FFYF's 2024 comments expressed concern about the scope of changes being made outside of congressional action to reauthorize the program and the missed opportunity to pair structural reforms with the federal investment they require. We continue to be concerned about both the regulatory whiplash that grantees experience when rules are

made and unmade in quick succession, and the piecemeal approach to addressing challenges that extend across federal early learning programs.

The *Improving Head Start for School Readiness Act of 2007* expired in 2011, and in the intervening years the early learning landscape, and the needs of families and communities, have changed significantly. Reauthorization would give the Administration and Congress the opportunity to ensure Head Start evolves in ways that best support children, families, and early educators and better leverage existing federal programs to create a more seamless continuum of care across communities and states. The role of Congress in making changes to the Head Start statute must be considered and upheld. This is especially true for proposed changes that cannot be implemented without additional federal investment. The only entity that can resolve the program's fiscal gap is Congress. That is not an abstraction; it is the structural reality of how Head Start works.

Reauthorization presents a critical opportunity to strengthen and modernize Head Start in ways that preserve its core elements, while expanding access for the children and families who need it most, particularly infants and toddlers. FFYF encourages consideration of the following priorities:

Modernize eligibility to better reflect community need. The current eligibility framework should be examined considering where unmet need is greatest. In communities where significant gaps in access persist, programs should have the flexibility to serve children beyond the current 100% of the Federal Poverty Line (FPL) threshold. Congress should consider whether State Median Income (SMI) or Area Median Income (AMI) would be a more locally responsive measure than FPL. One option worth exploring is aligning Head Start eligibility with the 85% SMI standard already used by the Child Care and Development Block Grant, which could strengthen coordination across programs and better support a mixed delivery system.

Reauthorization should also consider community-wide eligibility designations in areas of concentrated need, as well as broader categorical eligibility alignment with other federal social services to reduce fragmentation for families and providers alike. Finally, reauthorization should ensure that income-eligible and categorically eligible families have the freedom to enroll in any Head Start program regardless of the service area in which they reside, removing a barrier that can limit parent choice and leave available seats unfilled in programs outside a family's designated geography.

Align service models with the needs of working families. The majority of families served by Head Start are working parents who need reliable, full-day, full-year care, yet

many programs continue to operate part-day or part-year models that do not reflect this reality. Reauthorization should expect programs to respond to demonstrated community need by shifting toward full-day, full-year service delivery where demand warrants it. Congress should support grantees in blending Head Start funding with before- and after-school resources and other partnerships to extend the program day and should encourage adjustments to funded enrollment structures that better serve the working families Head Start is designed to reach.

Increase grantee flexibility and ensure resources reach the highest-need areas. The current grant structure can make it difficult for programs to adapt quickly when community demographics or family needs change. Reauthorization should consider a five-year grant period that includes meaningful flexibility for grantees to shift funded enrollment between Head Start and Early Head Start based on documented local need, without requiring a burdensome approval process. Facilitating program option changes and expediting OHS approval of facility moves and improvements when funding is available would allow grantees to respond more nimbly to where families are and what they need, rather than being constrained by administrative timelines that do not reflect conditions on the ground.

Reauthorization should also address the broader challenge of resource distribution across the country. Head Start currently serves only a fraction of eligible children, yet some programs struggle to maintain full enrollment due to shifts in local population, demographics, or staff availability. As part of natural grant cycles, OHS should assess program size and scope relative to current and projected demand within each service area, as well as examining unmet need across the broader region and state. Reauthorization should also direct a nationwide analysis of need, conducted in coordination with the annual appropriations process, to ensure that funding is available where demand is greatest and that communities with the highest concentration of eligible children are not underserved due to historical funding patterns that no longer reflect current conditions.

Prioritize conversion of Head Start slots to Early Head Start to meet documented infant and toddler need. State investments in pre-K have expanded access to preschool-age programming in many communities, while the supply of high-quality, affordable care for infants and toddlers has not kept pace with demand. Reauthorization should explicitly authorize and encourage grantees to convert Head Start preschool slots to Early Head Start slots where local needs assessments demonstrate greater unmet need among infants and toddlers. Likewise, OHS should be directed to streamline the approval process for such conversions, eliminating administrative barriers that currently make slot conversion difficult even when the

community case is clear. Aligning funded enrollment with documented demographic need, rather than historical funding patterns, would ensure that federal resources flow to the children and families for whom no comparable alternative exists.

Permanently authorize and expand Early Head Start-Child Care Partnerships (EHS-CCP). EHS-CCPs are a cost-effective and proven way to expand access to high-quality, comprehensive early care and education services for infants and toddlers. Currently funded through annual appropriations and treated like a Head Start “program option,” the EHS-CCP would benefit from permanent authorization, which would allow Congress to establish clear priorities informed by years of implementation experience. Reauthorization should also explore expanding the partnership model beyond Early Head Start to include three- through five-year-olds, creating Head Start–Child Care and Head Start–Pre-K partnership structures that broaden the reach of the program's high standards across the mixed delivery system.

Build a more seamless continuum of care for the youngest children. Reauthorization offers an opportunity to more intentionally link Early Head Start with other federal early learning investments, particularly the Maternal, Infant, and Early Childhood Home Visiting (MIECHV) program. Stronger programmatic connections between these complementary services would support more coordinated, family-centered care from the earliest months of a child's life.

Strengthen community partnerships, including with institutions of higher education. Reauthorization should support and encourage partnerships between Head Start programs and higher education institutions as a vehicle for embedding professional development directly within high-quality early learning settings, supporting workforce quality while creating meaningful career pathways for staff.

Improve and modernize the technical assistance system. The technical assistance available to Head Start grantees should be regularly assessed based on direct input from the field, and reauthorization should direct OHS to conduct systematic outreach to programs to identify gaps and ensure TA resources are responsive to current challenges. At the same time, reauthorization should examine the current funding structure for TA, which relies heavily on large, national center contracts. Moving TA funding closer to grantees would allow programs to more specifically target their individual needs, whether around transitioning to full-day, full-year service models; changing program options to meet shifting family demographics; navigating facilities moves and improvements; or addressing workforce compensation and operational sustainability. Head Start's community-driven design is one of its greatest strengths, but that level of local customization is complicated and resource-intensive. A more

grantee-directed TA system would better reflect the program's local character and give programs the targeted support they need to move quality forward on their own terms.

Strengthen and refine the Designation Renewal System (DRS). The DRS, established under the 2007 reauthorization, has been an important tool for building accountability and supporting continuous quality improvement in the program. Reauthorization should build on what OHS has learned from years of DRS implementation, making targeted improvements to ensure the system effectively identifies and supports high-quality grantees while providing a clear and fair process for addressing underperformance.

Maximize coordination across public funding streams. Head Start programs serve children and families who are often eligible for a range of additional public supports, and reauthorization should encourage programs to actively identify and coordinate every available funding source for which enrolled children and families qualify. At the federal level, Congress should consider how state CCDF administrators and other state early learning leads can more effectively partner with Head Start grantees to align resources and reduce gaps in service. Better coordination across funding streams would strengthen programs' ability to respond to the needs of working parents, support children's educational and developmental growth, and ensure responsible stewardship of federal dollars.

Strengthen cross-sector partnerships to expand access and improve outcomes. Head Start programs are most effective when they operate as part of a connected early learning ecosystem, rather than in isolation. Reauthorization should encourage robust collaboration among Head Start grantees, child care providers, school districts, and state agencies, partnerships that help families navigate available early learning options, support providers in filling available slots, and extend Head Start-level quality to children across a range of settings and backgrounds. Strong cross-sector coordination also ensures continuity of services as children transition into the K-12 system and enables more meaningful tracking of long-term child outcomes, providing the data needed to demonstrate the program's lasting impact.

FFYF appreciates the opportunity to submit comments on this proposed rule and remains committed to working with the Administration and Congress to support both a stable, fairly compensated workforce and to advance policies that strengthen Head Start for the children, families, and communities it serves. The priorities outlined above reflect our belief that Head Start's next chapter should be shaped through a deliberate, well-resourced reauthorization process, one that pairs meaningful structural reforms

with the federal investment necessary to make them real. The program's 61-year track record of bipartisan support is a testament to what Head Start represents: a shared commitment to giving every child, regardless of circumstance, a strong start. We look forward to continuing that work together.

Sincerely,



Sarah Rittling
Executive Director
First Five Years Fund