June 11, 2026

Submitted electronically

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Head Start
Attention: Director of Policy and Planning
330 C Street SW, 4th Floor
Washington, DC 20201

RE: U.S. Department of Health and Human Services, Administration for Children and Families, Proposed Rule titled, "Restoring Flexibility To Support Head Start Program Access," RIN number 0970-AD21, Docket number ACF-2026-0364, 45 CFR Part 1302 (May 12, 2026)

I. INTRODUCTION

For nearly 50 years, ZERO TO THREE has worked to ensure that all children and families have access to high-quality early childhood programs that support healthy development, school readiness, and family well-being. We appreciate the opportunity to comment on the U.S. Department of Health and Human Services (HHS or Department) Administration for Children and Families (ACF) proposed rule to rescind the Head Start wage and compensation standards finalized in 2024.

In our July 14, 2025, comment on the Department's *Request for Information (RFI): Ensuring Lawful Regulation and Unleashing Innovation to Make America Healthy Again*, we laid out a "Framework for Babies," describing six principles ZERO TO THREE urges the Department and its divisions to consider in any proposed policy changes in order to ensure policies address the needs of infants and toddlers.[1] These include: transparency and engagement; using the science of child development to guide policy; prioritizing the well-being of young children; strengthening the family to support the child; the need for knowledge, skills, and training to work with children; and the need to ease the burden of policies on individuals and families, not just systems. Through this lens, we would caution that the proposed rule would inadvertently undermine, rather than improve, the well-being of young children, largely by reducing access to the skilled, knowledgeable, well-trained workforce that keep children in Head Start on the strongest possible path to success.

Specifically, we are concerned that the proposal would exacerbate one of the central challenges facing Head Start programs nationwide: children cannot receive the high-quality early learning and developmental support they need without stable, skilled, and adequately compensated educators. As such, **ZERO TO THREE opposes the proposed rule and urges the Department to reconsider these rescissions and, instead, work to implement the 2024 Head Start Final Rule** to ensure Head Start educators receive the robust, reliable compensation they need to support babies facing some of the greatest challenges.

[1] ZERO TO THREE. (2025). Public comment RE: HHS notice titled "Request for Information (RFI): Ensuring Lawful Regulation and Unleashing Innovation to Make America Healthy Again" (Docket AHRQ-2025-0001, 90 Fed. Reg. 20478). https://www.regulations.gov/comment/AHRQ-2025-0001-0788

II. EARLY EDUCATORS ARE ESSENTIAL FOR STRONG, HEALTHY DEVELOPMENT

Head Start is a high-quality program with a demonstrated record of improving child outcomes, and the teachers and caregivers working directly with children are fundamental to its success. As the notice of proposed rulemaking (NPRM) notes, the first five years of a child's life are pivotal for brain development, laying the foundation for all future learning, behavior, and health. Research consistently demonstrates that children's development and early learning are best supported by nurturing adults who are trained, responsive, and skilled in supporting all domains of child development, including cognitive, language, social, emotional, behavioral, and relational development.[2] The quality of caregiving and stability of the adults in children's lives are among the strongest predictors of positive early childhood outcomes.[3]

This reality is especially important for infants and toddlers served through Early Head Start. During the first three years of life, children experience the most rapid period of brain development. Early Head Start is specifically built to meet the educational and developmental needs of infants and toddlers facing the biggest barriers to learning.[4] It delivers a full package of child care, health checkups, and parenting support, both in the community and through home visiting, allowing communities to choose the options that best work for families. Early Head Start helps moms have healthy pregnancies, links parents to job training and education, and equips infants and toddlers with the skills they need to arrive at kindergarten ready to learn. By age two, children in Early Head Start are more curious, better at using words, and show stronger social skills than their peers who aren't in the program.[5] Many of these benefits are still visible through elementary school, with Head Start supporting even further gains.[6]

Good teachers – including classroom educators, home visitors, family specialists, and other support staff – are central to Head Start's mission and the high-quality care children deserve. As the NPRM notes, "It is critically important that programs maintain services for as many Head Start children and families that are eligible as possible" – a goal that must include the maintenance of *quality* services, which require a skilled, experienced, and stable workforce.

Put simply, quality matters. Early learning settings that prioritize young children's relationships, language, emotions, and development are associated with increased safety and positive development, leading to fewer social and emotional challenges in school, stronger language growth, and better early literacy outcomes.[7] Improving quality also offers parents trust, safety, and the assurance their child is nurtured in a supportive environment, creating real options for parents to choose the care that is right for their family and supporting them in moving toward greater economic security.

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[2] Schoch, A. D., Gerson, C. S., Halle, T., & Bredeson, M. (2023). *Children's learning and development benefits from high-quality early care and education: A summary of the evidence* (OPRE Report #2023-226). HHS, ACF, Office of Planning, Research, and Evaluation. https://acf.gov/sites/default/files/documents/opre/%232023-226%20Benefits%20from%20ECE%20Highlight%20508.pdf

[3] Center on the Developing Child, Harvard University. (2026). *From resources to routines: The importance of stability in the developmental environment* (Working Paper No. 4). https://developingchild.harvard.edu/wp-content/uploads/2026/03/HCDC-ECSCEE-Stability.pdf

[4] ZERO TO THREE. *Early Brain Development*. https://www.zerotothree.org/early-brain-development/; Shonkoff, J. P., & Phillips, D. A. (Eds.) (2000). *From neurons to neighborhoods: The science of early childhood development.* National Academy Press.

[5] HHS, ACF. (2002, June). *Making a difference in the lives of infants and toddlers and their families.* https://acf.gov/opre/report/making-difference-lives-infants-and-toddlers-and-their-families-impacts-early-head

[6] HHS, ACF. (2006, April). *Research to Practice: preliminary findings from the early head start prekindergarten follow-up*. https://acf.gov/opre/report/research-practice-preliminary-findings-early-head-start-prekindergarten-followup

[7] Schoch, A. D., Gerson, C. S., Halle, T., & Bredeson, M. (2023). *Children's learning and development benefits from high-quality early care and education: A summary of the evidence* (OPRE Report #2023-226). HHS, ACF, Office of Planning, Research, and Evaluation. https://acf.gov/sites/default/files/documents/opre/%232023-226%20Benefits%20from%20ECE%20Highlight%20508.pdf

These gains depends on stable, responsive relationships with trusted caregivers to support healthy attachment, emotional regulation, communication, and early learning.[8] For infants and toddlers, relationships are not supplemental to learning; they are the foundation of learning and healthy development.[9] Workforce instability and teacher turnover are therefore particularly challenging in infant and toddler settings, where continuity of care is essential. Early educators perform extraordinarily complex and highly skilled work. They foster learning and healthy development during the most critical years of brain development, identify developmental concerns, support children's behavioral health, partner with families, and create safe, nurturing, and developmentally responsive learning environments for young children. Infant-toddler educators additionally support feeding, sleep, co-regulation, attachment, developmental screening, and early relational health during the most sensitive developmental period of life. This work requires specialized knowledge, interpersonal and educational skills, and stable relationships with children and families.[10]

III. THE PROPOSED RULE WOULD EXACERBATE WORKFORCE CHALLENGES

At the same time, Head Start teachers continue to face significant compensation challenges despite the skills, qualifications, and responsibilities their work requires. Federal data and extensive research demonstrate that Head Start compensation lags behind that of similarly qualified elementary school educators and often does not provide long-term economic stability for staff.[11] In many communities, Head Start programs are competing against school districts, retail employers, health systems, and other industries that offer higher wages and stronger benefits,[12] drawing away many of the most skilled educators during children's most vulnerable time in life. On average, Head Start teachers earn just 64% of a K-12 public school teacher's salary, amounting to a gap of nearly $26,500 annually.[13]

These pressures have intensified as Head Start funding has struggled to keep pace with inflation and rising operating costs over time. Cost-of-living adjustments have been insufficient to fully address increases in housing, transportation, food, insurance, utilities, and staffing expenses for multiple years. Currently, many Head Start programs have yet to receive the de minimis 0.6% cost of living adjustment, which translates to 15 cents per hour, that was included in the FY 2026 appropriations bill. As a result, many programs are working to sustain high-quality comprehensive services while operating under considerable financial strain.

The consequences of inadequate compensation are significant and well documented. Teacher turnover in Head Start settings is associated with negative impacts on children's school readiness and

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[8] HHS, ACF, Office of Head Start. (2025, April). *Responsive caregiving as an effective practice to support children's social and emotional development.* https://www.headstart.gov/video/responsive-caregiving-effective-practice-support-childrens-social-emotional-development

[9] Lally, J. R. & Mangione, P. L. (2017, May). National Association for the Education of Young Children. *Caring Relationships: the heart of early brain development.* https://www.naeyc.org/resources/pubs/yc/may2017/caring-relationships-heart-early-brain-development

[10] *Id.*

[11] McLean, C., Austin, L. J. E., et al. (2024). *Early Childhood Workforce Index 2024: Early educator pay and economic insecurity across the states*. Center for the Study of Child Care Employment, University of California, Berkeley. https://cscce.berkeley.edu/workforce-index-2024/the-early-childhood-educator-workforce/early-educator-pay-economic-insecurity-across-the-states/; Vicente D, Venegas, M., & Guerrero A.D. (June 2025). *Turn-over and retention among Head Start educators*. *Early Childhood Education Journal,* 53 (5):1467-1478. https://pmc.ncbi.nlm.nih.gov/articles/PMC12331161/#ABS1

[12] Healy, M., Fidel, R., & Barnett, S. (2026, May). *The real cost of rolling back Head Start wage requirements*. National Institute for Early Education Research.

[13] *Id.*

developmental outcomes.[14] Low wages, high workloads, and inadequate workplace supports are major contributors to workforce instability,[15] contributing to workforce shortages, burnout, and high turnover.[16] These gaps in compensation are even greater for Early Head Start teachers.[17] Meanwhile, research shows that increasing compensation improves recruitment and retention and reduces teacher turnover.[18] Stable relationships with qualified educators are foundational to children's healthy development and learning, particularly for infants and toddlers. When teachers leave frequently, children can lose continuity of care and trusted relationships that support emotional security, attachment, and healthy brain development.

The workforce challenges facing the field are also affecting access for eligible children and families nationwide. Across the country, Head Start programs have closed classrooms, reduced enrollment slots, or operated below funded capacity because they have struggled to recruit and retain qualified educators at current wage levels. According to a ZERO TO THREE analysis of Office of Head Start enrollment data, only about one-third of programs reached full enrollment in 2024, and staffing capacity appears to be a central driver of this challenge.[19] Under-enrolled programs experience higher vacancy rates, limiting their ability to reopen classrooms and sustain enrollment recovery. Under-enrollment is therefore not solely a demand issue; it is also closely connected to workforce capacity.

The impacts of increasing workforce challenges are likely to be especially accurate in rural areas, which disproportionately rely on Head Start. In rural communities, Head Start is often one of the only early learning or child care options available, and high-quality child care may be especially difficult to find. In fact, in some rural areas, Head Start makes up over 90% of child care options.[20]

These issues are particularly visible in Early Head Start programs, where infant and toddler classrooms are among the most difficult positions to staff because of the necessities of caregiving for babies. In these settings, programs must provide a higher level of hands-on caregiving, maintain a sufficient number of staff to keep children safe, and ensure the specialized expertise required to support very young children. Communities across the country already face serious shortages of infant-toddler care,[21] and workforce instability further limits access to these critical services.

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[14] Bassok, D., Markowitz, A. J., Hamre, B. K., & Ansari, A. (2024, May). *Within-year teacher turnover in Head Start and children's school readiness. AERA Open, 10*. https://journals.sagepub.com/doi/full/10.1177/23328584241245094

[15] Vicente, D., Venegas, M., & Guerrero, A. D. (2025). *Turn-over and retention among Head Start educators*. *Early Childhood Education Journal*. https://pubmed.ncbi.nlm.nih.gov/40777574/

[16] Salas Atwell, M., Hains, D., et al. (2025, February). *An unsustainable status quo: We all bear the burdens of an underfunded system*. National Association for the Education of Young Children. https://www.naeyc.org/sites/default/files/globally-shared/downloads/PDFs/our-work/public-policy-advocacy/feb_2025_an_unsustainable_status_quo_final_0.pdf

[17] Mackenzie-Liu, M., Drukker, D., Schilder, D., & Waterman, C. (2024, March). *Head Start and Early Head Start workforce salaries*. Urban Institute. https://www.urban.org/sites/default/files/2024-03/Head_Start_and_Early_Head_Start_Workforce_Salaries.pdf

[18] Kwon, K.-A., Jang, W., et al. (2025). *A longitudinal study of Head Start teacher turnover trends and factors*. *Teaching and Teacher Education, 156*, 104916. https://doi.org/10.1016/j.tate.2024.104916

[19] ZERO TO THREE. (2026). Internal Analysis (unpublished). Data retrieved from Office of Head Start. *Enrollment Statistics Report for FY 2024*. https://hses.ohs.acf.hhs.gov/auth/login

[20] Meek, S., Bucher, E., et al. (2025, May). *Head Start's footprint: A focus on rural communities, children with disabilities and vital health services*. Arizona State University. https://cep.asu.edu/resources/HeadStartsFootprint

[21] Bishop, S. (2023, February). *$122 billion: The growing, annual cost of the infant-toddler child care crisis*. ReadyNation. https://strongnation.s3.amazonaws.com/documents/1598/05d917e2-9618-4648-a0ee-1b35d17e2a4d.pdf

IV. INCREASED WORKFORCE CHALLENGES WILL UNDERMINE CHILDREN'S DEVELOPMENT AND EARLY EDUCATION ACCESS

Ensuring a baseline competitive, livable wage promotes workforce stability; in contrast, removing those protections will serve only to exacerbate workforce challenges—harming not just quality but also access.

Just as high-quality care can set children on the path to success, inconsistent or low-quality care can fail to improve – or even set back – young children's development. As discussed above, the early education field has long been challenged by low levels of compensation accompanied by high levels of staff turnover. This turnover then has a negative impact on children. Positive child development is fundamentally grounded in caring and stable relationships with adults—high staff turnover disrupts these relationships.[22] Similarly, staff turnover in and of itself creates a financial burden for programs, who must continuously recruit, hire, and train new staff, with potential ramifications not only on quality but the ability to serve all eligible families.[23]

Compensation, quality, and access are not competing priorities, but rather interconnected. While the Department's proposal seeks to provide programs with flexibility, weakening compensation standards is likely to exacerbate the workforce instability and shortages that are already limiting enrollment and disrupting services for families. Low compensation ultimately reduces access when programs cannot maintain sufficient staffing to operate classrooms effectively.

In other words, children cannot receive the nurturing, responsive, developmentally focused experiences that Head Start promises if the adults caring for and teaching them are underpaid, overburdened, and continually leaving the field. These impacts will in turn undermine access to Head Start for the community at large, while undermining the quality early learning that young children need for the strongest start.

V. CONCLUSION

In recognition of the critical role a skilled, stable workforce plays in the early learning of infants and toddlers, ZERO TO THREE opposes the proposed rule. We respectfully urge the Department to withdraw the proposed role rescinding the Head Start wage and compensation standards and instead pursue policies that strengthen and sustain the Head Start workforce through adequate funding, competitive compensation, and long-term investments in quality, including by implementing the 2024 Head Start Final Rule and working with Congress to robustly fund Head Start programs.

The evidence is clear that children's healthy development and early learning depend on stable relationships with skilled educators, and stable educators depend on fair compensation and sustained investment. Ensuring that Head Start programs can recruit and retain qualified teachers is essential to maintaining both access and quality for children and families nationwide.

Thank you for the opportunity to provide comments on this proposed rule.

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[22] Bryant, D., Yazejian, et al. (2024). *Supporting the early childhood education workforce: Lessons learned from a statewide initiative to reduce teacher turnover*. *Early Childhood Research Quarterly, 67*, 198–208. https://doi.org/10.1016/j.ecresq.2023.11.007

[23] Fee, K. (2024, January). *Using worker flows to assess the stability of the early childcare and education workforce, 2010–2022*. Federal Reserve Bank of Cleveland. https://doi.org/10.26509/frbc-cd-20240119; Georgia Department of Early Care and Learning. (2024). *The cost of turnover in the early childhood workforce*. https://www.decal.ga.gov/documents/attachments/CostofTurnover.pdf