



Restoring Flexibility to Support Head Start Program Access

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Dear Director of Policy and Planning,

Thank you for the opportunity to comment on Head Start [ACF-2026-0364]. I am Dr. Flynn Ross, Professor and chair of Teacher Education at the University of Southern Maine. I have worked in education from nursery school through graduate school for over 30 years. My research has focused most recently on workforce development and teacher shortages.

I oppose the proposed rule changes because paying staff enough to cover basic living expenses is essential for maintaining a stable workforce and the high-quality Head Start programs that the research and established success are based upon. The proposed change in rules to add 'flexibility' in workforce removes the 2024 revision which stated that, "the wage standards in § 1302.90(e) require, by August 1, 2031, that programs: develop or update a pay scale for all staff; provide education staff with wages comparable to public preschool teachers; provide all staff a salary sufficient to cover basic costs of living; and promote wage comparability across Head Start Preschool and Early Head Start." A basic cost of living ensures a stability of the workforce that is essential to ensure the program quality for the success of our youngest students.

Consistent workforce turnover is expensive due to recruitment, retraining, and the loss of human capital that ensures program quality and continuous improvement. The costs of teacher turnover are documented as \$25,000 per teacher in 2024 for an estimated \$8.5 billion annually for K-12 according to [The Learning Policy Institute](#). Similar issues impact Head Start.

As a teacher educator I see the impact of these costs of low wages and teacher turnover on a daily basis. Many of my undergraduate students work in early childhood pre-schools for minimum wage while attending school. Many cycle through different workplaces because of scheduling challenges, understaffing, or taking different jobs that pay more to meet their own basic needs. The inconsistency in staffing is detrimental to children and their families who are constantly adjusting to new caregivers.

Please maintain the 2024 wage standard in § 1302.90(e) required by August 1, 2031 as a minimum for the basic cost of living to ensure a stable workforce.