

5/16/24

RE: Docket No. ACF–2023–0011, Supporting the Head Start Workforce and Consistent Quality Programming

Neera Tanden and Lael Brainard:

We appreciate the work the Biden Administration has done to highlight the importance of the childcare workforce across the Administration, including issuing NPRM’s for regulatory changes that are critical for addressing the childcare workforce crisis.

The undersigned labor organizations, representing early learning and childcare workers, including Head Start workers across the country, **write to urge the Administration to swiftly finalize and publish a strong final rule, that maintains the NPRM language, on Supporting the Head Start Workforce and Consistent Quality Programming.** This proposed rule, that we hope to see soon as a final rule, aims to support and stabilize the federal Head Start program through new requirements for higher staff wages, benefits, and health and wellness supports. The rule is urgently needed to ensure there is a stable workforce to maintain consistent operations for disadvantaged communities.

Strong and stable relationships formed between children and their early educators create the foundation for effective learning and development, serving as a key factor in positive child outcomes.¹ However, for decades, the Head Start program has been subsidized by the labor of low-paid workers, predominantly women of color and immigrants, performing historically undervalued work. The average wage for a Head Start teacher is \$35,000.² This is essentially at the HHS 2024 poverty level for a family of 4 – \$31,200.³ Furthermore, many Head Start workers have student debt from obtaining bachelors' degrees in early education. This poverty wage, coupled with other factors, has led to high turnover rates among workers, disrupting the continuity of services critical for children’s developmental outcomes.⁴ As a result, there is a severe nationwide staffing shortage at its highest peak in two decades,⁵ with Head Start programs struggling to both retain and hire qualified staff.

The Head Start Program was established in 1964 as part of President Johnson’s war on poverty.⁶ In establishing the Head Start Program, “the government was influenced by new research on the effects of poverty, as well as its impact on education. This research indicated an obligation to help disadvantaged groups, compensating for inequality in social or economic

¹ Pianta, R and Stuhlman, M.W., 2019, Teacher-Child Relationships and Children’s Success in the First Years of School. *School Psychology Review*, 33, 444-458.

² The White House, FACT SHEET: Biden-Harris Administration Announces Most Sweeping Set of Executive Actions to Improve Care in History, April 18, 2023. Last visited May 13, 2024, <https://www.whitehouse.gov/briefing-room/statements-releases/2023/04/18/fact-sheet-biden-harris-administration-announces-most-sweeping-set-of-executive-actions-to-improve-care-in-history/>

³ HHS, Office of the Assistant Secretary for Planning and Evaluation, 2024 Poverty Guidelines for the 48 Contiguous states and the District of Columbia, <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

⁴ Pianta, R, *supra* at 1.

⁵ Head Start Program Information Report, Fiscal Year 2022, <https://eclkc.ohs.acf.hhs.gov/data-ongoing-monitoring/article/head-start-program-facts-fiscal-year-2022>

⁶ Office of Head Start, Head Start History, June 30, 2023, last visited May 13, 2024 <https://www.acf.hhs.gov/ohs/about/history-head-start#:~:text=Johnson%20declared%20a%20War%20on,in%20social%20or%20economic%20conditions>

conditions.”⁷ It is unacceptable that Head Start workers are expected to work for poverty wages. The purpose of the Head Start program is to lift communities out of poverty, not perpetuate it. This long overdue rule will allow Head Start programs to finally address these challenges.

As President Biden declared in his 2023 proclamation declaring April Care Workers Recognition Month, childcare workers are “unsung heroes” who “strengthen our communities and form the backbone of our Nation’s economy.”⁸ He pledged to “always stand” with childcare workers, ensuring they are “seen, valued, and rewarded fairly for the work...”⁹ We urge the Administration to continue to stand with childcare workers by finalizing and publishing a strong final rule to strengthen the Head Start workforce.

We look forward to continuing to work together to strengthen the childcare workforce, for workers, the children in their care, and our communities.

In solidarity,

SEIU
AFL-CIO
AFT
AFSCME

Cc:

Angela Ramirez, Deputy Chief of Staff, Department of Health and Human Services

Katie Hamm, Deputy Assistant Secretary for Early Childhood Development, Office of Early Childhood Development

Khari Garvin, Director, Office of Head Start, Administration for Children and Families

Brendan Danaher, Deputy Director for Labor, National Economic Council

⁷ *Id*

⁸ President Biden, A Proclamation on Care Workers Recognition Month, March 31, 2023, last visited May 13, 2024 <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/03/31/a-proclamation-on-care-workers-recognition-month/#:~:text=BIDEN%20JR.%2C%20President%20of%20the,as%20Care%20Workers%20Recognition%20Month>,

⁹ *Id*