



# FLORIDA HEAD START ASSOCIATION, INC.

June 11, 2026

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

**Re: Docket ID ACF-2026-0364 | RIN 0970-AD21**

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Dear Secretary Kennedy:

For more than 60 years, Head Start has served as the nation's most comprehensive early childhood program, prioritizing children and families most removed from opportunity. Head Start is a prenatal-to-five model that supports children's school readiness and strengthens families through early learning, health and wellness, nutrition, mental health, family engagement, and services for pregnant women. These services promote healthy child development and long-term family stability in communities across the country.

## EXECUTIVE DIRECTOR

Wanda Minick

On behalf of Florida's 128 Head Start and Early Head Start grantees and Child Care Partnerships, which serve more than 40,000 children and families across the state, the Florida Head Start Association respectfully submits these comments regarding the proposed rule titled *Restoring Flexibility To Support Head Start Program Access*. Florida's programs share the Administration's goal of strengthening the workforce and ensuring that educators are paid fairly for the essential work they do. Programs want to offer competitive wages, retain qualified staff, and maintain the high standards that define Head Start. At the same time, programs remain deeply concerned that the 2024 compensation requirements were implemented without the federal funding necessary to support them. This requirement was issued as an unfunded mandate layered on top of three consecutive years of largely flat federal funding. Programs cannot meaningfully raise wages, expand benefits, or achieve pay parity with public schools without corresponding increases in federal appropriations.

Florida's programs are experiencing a similar workforce crisis documented nationwide but are also facing structural pressures that make implementation of unfunded requirements especially challenging. According to the 2026 Florida Head Start Association (FHSA) & Florida Head Start Collaboration Office (HSCO) Compensation and Benefits Study, Head Start teacher salaries vary significantly by degree level and role. Head Start teachers with a bachelor's degree or higher earn an average of \$46,877, while Early Head Start teachers earn an average of \$34,912. Head Start teacher assistants with associate degrees earn an average of \$38,844, and those with a Child Development Associate (CDA) or state-awarded certificate earn between \$28,191 and

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\$32,411.<sup>1</sup> These wages do not reflect the skills, training, or responsibilities required of Head Start educators, nor do they align with the expectations placed on them.

Unlike Florida's School Readiness (SR) and Voluntary PreKindergarten (VPK) programs, Head Start teachers are required by federal law to meet significantly higher credentialing standards. At least 50 percent of Head Start teachers must hold a bachelor's degree, and the remainder must have an associate degree at minimum. Early Head Start teachers must hold a CDA or equivalent, and many have higher degrees. Teacher assistants must also hold or be working toward a CDA or state-awarded certificate. These requirements exceed those found across much of Florida's broader early learning system, where SR teachers are not required to hold a degree, and most VPK classrooms do not require a bachelor's-level teacher. Despite these higher expectations, Head Start teachers in Florida earn substantially less than public school teachers, who average \$60,450 annually according to the U.S. Bureau of Labor Statistics.<sup>2</sup> This mismatch between required qualifications and available compensation makes it extremely difficult for programs to recruit and retain the highly trained workforce that federal standards demand.

The impact on program operations and family access is substantial. Florida's Head Start programs confront persistent turnover and vacancies that directly limit families' access. Based on statewide data, Florida experienced a 17.5 percent turnover rate among Head Start and Early Head Start staff during the most recent program year (1,905 departures out of 10,890 staff).<sup>3</sup> Instructional turnover reached 21.1 percent, and programs reported a 46 percent gap in vacancy replacement.<sup>4</sup> Nearly one third of Florida programs (31 percent) have applied to reduce funded enrollment because they cannot hire or retain enough qualified staff to operate all classrooms.<sup>5</sup> These are not isolated program-level issues; they reflect a broader structural compensation crisis that individual grantees cannot resolve independently.

Directors across Florida consistently report losing staff to public school districts that can offer significantly higher salaries, supported by union contracts and state funding streams that Head Start does not have access to. Programs also emphasized that

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<sup>1</sup> 2026 FHSA & HSCO Compensation and Benefits Study (instructional turnover and vacancy gap)<https://fhsa.memberclicks.net/assets/HSSCO/FHSA%202025%20Report-v2%20pix.pdf>

<sup>2</sup> Center for the Study of Child Care Employment. (2024). Early educator pay & economic insecurity across the states. University of California, Berkeley. <https://cscce.berkeley.edu/workforce-index-2024/the-early-childhood-educator-workforce/early-educator-pay-economic-insecurity-across-the-states/>

<sup>3</sup> Florida Head Start workforce turnover data (PIR 2025) <https://www.flheadstart.org/florida-program-information-report>

<sup>4</sup> 2026 FHSA & HSCO Compensation and Benefits Study (instructional turnover and vacancy gap)<https://fhsa.memberclicks.net/assets/HSSCO/FHSA%202025%20Report-v2%20pix.pdf>

<sup>5</sup> 2026 FHSA & HSCO Compensation and Benefits Study (funded enrollment reduction applications).<https://fhsa.memberclicks.net/assets/HSSCO/FHSA%202025%20Report-v2%20pix.pdf>

serving children with disabilities—at least 10 percent of enrollment, as required by the Head Start Program Performance Standards—is significantly more expensive, and these costs are rising. Without additional funding, programs struggle to meet these requirements while also attempting to raise wages.

Florida’s early learning system is chronically underfunded. While Florida is not the lowest-paying state in the country, early childhood educator wages remain far below a living wage and are among the least adequate when adjusted for cost of living. The Center for the Study of Child Care Employment (CSCCE), Workforce Index shows that Florida’s early educators experience high levels of economic insecurity, and that the gap between early childhood wages and a living wage is among the largest nationally. <sup>6</sup>This wage inadequacy, combined with rising housing and cost-of-living pressures, makes it extremely difficult for programs to recruit and retain qualified staff.

Head Start programs must also secure substantial non-federal match contributions in a landscape where early childhood resources are already limited. This places programs at a disadvantage when competing for qualified staff and responding to rising operational costs. Florida’s minimum wage increases, while beneficial for entry-level workers, have created wage compression that erodes pay differentials for experienced and credentialed staff. At the same time, average annual salary increases across Head Start positions dropped to just 1.3 percent in 2025, far below inflation, meaning most staff are experiencing real declines in compensation.<sup>7</sup>

The NPRM suggests that eliminating the 2024 compensation standards will free up resources to expand access. Florida programs do not believe this outcome is realistic. No resources are freed up by rescinding this rule, because the primary barrier to access is not regulatory burden – it’s the inability to recruit and retain qualified staff. In 2023, approximately 100,000 Head Start slots nationwide went unfilled due to insufficient staffing, as recorded in the 2024 Final Rule.<sup>8</sup> In Florida, empty classrooms, delayed openings, increased reliance on substitutes, and staff departures for higher-paying jobs are already widespread. Eliminating compensation protections does not resolve these

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<sup>6</sup> Center for the Study of Child Care Employment. (2024). Early educator pay & economic insecurity across the states. University of California, Berkeley. <https://cscce.berkeley.edu/workforce-index-2024/the-early-childhood-educator-workforce/early-educator-pay-economic-insecurity-across-the-states/>

<sup>7</sup> 2026 FHSA & HSCO Compensation and Benefits Study (salary increase trends). <https://fhsa.memberclicks.net/assets/HSSCO/FHSA%202025%20Report-v2%20pix.pdf>

<sup>8</sup> Supporting the Head Start Workforce and Consistent Quality Programming, 89 Fed. Reg. 67,720 (Aug. 21, 2024). <https://www.federalregister.gov/documents/2024/08/21/2024-18279/supporting-the-head-start-workforce-and-consistent-quality-programming>

workforce challenges — it simply leaves programs without the tools needed to stabilize their workforce.

Florida’s programs have demonstrated extraordinary commitment and creativity in supporting their workforce despite limited resources. Programs have implemented sign-on bonuses, longevity pay, employer-covered health premiums, structured onboarding systems, mentoring programs, job-embedded training pathways, and robust staff wellness initiatives. Nearly nine in ten programs invest in staff well-being, and more than half have built career pathways that support professional growth and retention.<sup>9</sup> These efforts express a deep dedication to staff and families, but they cannot overcome structural funding constraints. As one program leader noted, “These program-level efforts cannot on their own offset structural forces that operate well beyond any individual program’s control.”<sup>10</sup>

Florida’s children and families need a Head Start system that is fully supported and staffed to deliver the high-quality services for which Head Start is known. Programs are committed to meeting the Head Start Program Performance Standards and to paying their staff fairly. However, when new compensation requirements are introduced without the federal funding needed to implement them, programs are placed in an untenable position. This is not a matter of unwillingness to meet expectations — it is a matter of lacking the resources required to fulfill them. To maintain a stable, qualified workforce and uphold the Head Start mission for the nation’s most vulnerable children, the Administration and Congress must pair expectations with the appropriations necessary to achieve them.

For these reasons, the Florida Head Start Association urges the Administration to ensure that any workforce expectations are paired with the federal funding required to implement them. Florida programs support fair, competitive wages for their staff, but rescinding the 2024 compensation standards does not generate \$2 billion in future cost savings or preserve the 106,000 slots suggested in the NPRM<sup>10</sup>. Head Start’s funding history shows that program costs rise with inflation and enrollment needs, not with the presence or absence of compensation requirements.

For these reasons, the Florida Head Start Association urges the Office of Head Start to pause finalization of this proposed rule and commission a comprehensive study to

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<sup>9</sup> Florida Head Start State Collaboration Office, 2025–2026 State Needs Assessment (program feedback on wellness, career pathways, and director perspectives). <https://fhsa.memberclicks.net/assets/HSSCO/UPDATED%20Florida%20Head%20Start%20State%20Collaboration%20Office%20State%20Needs%20Assessment%202025-2026%20KS.pdf>

<sup>10</sup> Supporting the Head Start Workforce and Consistent Quality Programming, 89 Fed. Reg. 67,720 (Aug. 21, 2024). <https://www.federalregister.gov/documents/2024/08/21/2024-18279/supporting-the-head-start-workforce-and-consistent-quality-programming>

develop a sustainable path forward. Such a study should examine the full scope of the workforce crisis, including the gap between required credentials and available compensation, the structural funding constraints that prevent programs from competing effectively in local labor markets, and the real costs of turnover on children, families, program quality, and program access.

The resulting plan should be deliberate, evidence-based, and grounded in the realities facing Head Start programs nationwide. It should maintain the high credentialing standards that define Head Start quality, establish a realistic and adequately funded timeline for achieving compensation parity, and pair workforce expectations with the federal appropriations necessary to fulfill them. Florida's 128 Head Start and Early Head Start grantees—and the more than 40,000 children and families they serve—deserve nothing less.

Thank you for the opportunity to submit these comments and for your consideration of the perspectives of Florida's Head Start programs and the families they serve.

If you have further questions or require clarification, please contact [Wanda@FLHeadStart.org](mailto:Wanda@FLHeadStart.org).

Sincerely,

*Wanda Minick*

Wanda Minick  
Executive Director  
Florida Head Start Association