

Response to the Proposed Rule on

Supporting the Head Start Workforce and Consistent Quality Programming

Docket Number: ACF-2023-0011

RIN: 0970-AD01

January 19, 2024

Submitted to:

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Introduction

The proposed changes to the Head Start Program Performance Standards (HSPPS) are an important step to stabilize the Head Start workforce and improve service quality. The improvements to wages, along with increased attention to the mental health and wellness needs of staff, children, and families, have the potential to change the status quo for compensation and help build and sustain a qualified and professional early care and education (ECE) workforce. Head Start is a national laboratory and innovation leader in the ECE field that can set a course for improvements throughout the ECE system. As a nonpartisan organization committed to producing evidence in support of the public good, Mathematica has a long history of conducting research in partnership with Head Start programs to inform policy and planning. In addition to highlighting the data cited in the notice, we focus on a few key points that reinforce the need for the proposed changes. We also look at areas that will be important to track to understand how programs implement the changes, and what supports they need to do so.

The Need for Change

Head Start educators provide ECE and child development services to young children and their families but do not receive compensation that reflects their value. As the notice points out, turnover rates in Head Start programs are the highest in decades, affecting educators and the vulnerable children and families the programs serve.

Educator turnover issues are pervasive in both Preschool Head Start and Early Head Start.

Nationally representative survey data show the magnitude of these challenges across programs. Twenty-three percent of Head Start centers had a lead teacher turnover rate of 26 to 100 percent, and almost one in every 10 centers had turnover of more than 100 percent, meaning that they had to replace teachers more than once over 12 months (Doran et al. 2022). Early Head Start centers face similar challenges. In the 2021–2022 program year, 25 percent of centers had to replace at least one teacher from the previous year, and 10 percent had to replace 21 to 50 percent of their teachers (Xue et al. 2023).

Difficulties recruiting and retaining Head Start educators can lead to detrimental effects on children.

Young children benefit from stable, responsive, and nurturing relationships with caregivers (Tarullo et al. 2009). ECE settings can facilitate educator-child relationships by practicing continuity of care, assigning children to an educator who is primarily responsible for their care. This practice increases the opportunities for children to develop a meaningful relationship with their educator (Ruprecht et al. 2016), which in turn is associated with some positive outcomes for these children (Horm et al. 2018). Turnover disrupts these relationships and might interfere with the children's development.

Long-term, sustainable wage improvement is needed to address the current workforce crisis.

Financial incentives such as bonuses and temporary wage boosts have shown promise in promoting recruitment and retention (Bassok et al. 2021; Morrissey and Bowman 2023). However, a recent Texas study shows that although temporary changes in compensation, such as wage supplements, help improve recruitment and retention, they do not go far enough, and more ambitious strategies to permanently raise wages are needed (Cunha and Lee 2023). To wit, an early impact analysis of the District of Columbia's Early Childhood Educator Pay Equity Fund, which

raises wages for ECE educators (including Head Start teachers), found a 3.2 percent increase in ECE educator employment levels over expected employment levels in the absence of the wage increase (Schochet 2023).

Research on child care partners that participated in the Early Head Start-Child Care Partnership (EHS-CCP) grants provides evidence that HSPPS can affect child care quality in community child care. EHS-CCP child care partners engaged in many new and enhanced activities to improve the quality of care they provided, such as individualizing services for families, providing staff with coaching and additional training, and helping staff obtain Child Development Associate credentials (Del Grosso et al. 2019). These improvements were linked to the partners meeting HSPPS requirements.

Understanding and Supporting Implementation

The proposed changes will involve a substantial shift in how Head Start programs use resources. Understanding and exploring the implementation of the changes, along with any effects and unintended consequences, will be important for Head Start and the ECE field more broadly. The following areas will warrant investigation as the changes are rolled out:

- **How changes in HSPPS impact the broader ECE system.** The mixed funding landscape of ECE, with many providers and programs combining Head Start funding with other sources, means these changes will reverberate throughout the ECE system in ways that will be important to track, understand, and support. In 2020, just 6 percent of Head Start Preschool programs were funded solely by Head Start (Bernstein et al. 2022). The majority of programs (62 percent) had three or more revenue sources beyond Head Start. State or local funding for pre-K was the second largest source of revenue, and slightly more than one-third of programs enrolled children who were supported by Head Start and child care subsidies (Bernstein et al. 2022). Given the interconnectedness of the ECE system, the proposed changes are unlikely to be isolated to Head Start, and it will be important to track and understand how the larger system responds.
- **Whether reductions in enrollment affect some programs and communities disproportionately.** Resources vary considerably among Head Start programs, and programs with fewer resources might experience more pronounced challenges implementing the new standards. Head Start Preschool programs that are not administered within school systems (the large majority of programs) and most Early Head Start programs will have to fill a larger gap in wages to achieve pay parity with preschool teachers in elementary schools. In 2020, the average annual teacher salary in Head Start Preschool programs within school systems (13 percent of programs) was \$44,484, and 57 percent of teachers in these programs earned more than \$45,000. Teachers working in programs in community action agencies or other agencies earned less, with average annual salaries of \$27,367 and \$35,503, respectively (Doran et al. 2022). Just 6 percent of teachers working in programs in community action agencies earned more than \$45,000; 17 percent of teachers in programs in other types of agencies earned more than \$45,000. Given the discrepancies in pay for Head Start educators across agency types, certain programs may require more severe reductions in enrollment to meet the proposed compensation standards without additional funding.
- **Defining the staff for whom the standards apply.** The proposed standards will be expected to apply to staff whose salaries are paid, at least in part, with Head Start funds, including contracted staff, such as child care partners funded through EHS-CCP grants. Most Head Start

Preschool programs rely on multiple sources of revenue and tend to serve children supported by different funding streams in the same classrooms (Bernstein et al. 2022). The variability in funding, how services are provided, and who provides them suggests attention should be paid to ensure wage increases are implemented fairly and equitably. This blending of funds and of children with different funding streams in the same classrooms in Head Start programs suggests wage increases would apply widely across settings that serve children participating in Head Start. A potential positive outcome in response to the new standards would be wages increasing for all ECE educators—or at least for all educators in settings serving a mix of children with and without Head Start funding. A potential unintended outcome could occur if programs could not afford to increase salaries for all educators. They might instead shift to Head Start-only funded classrooms and increase wages only for educators in those classrooms. In a 2022 follow-up survey about EHS-CCP, both EHS program directors and child care provider respondents reported insufficient funding as one of the top two barriers impeding the sustainability of partnerships (Clochard et al. 2023). Inequities in compensation within a given center could result in more staff turnover and greater difficulty in hiring educators for non-Head Start classrooms. Community child care providers that cannot increase wages sufficiently might also be less willing or able to partner with Head Start programs, which is also contrary to Head Start’s goals.

The Importance of Training and Technical Assistance

As the government recognizes, training and technical assistance (TTA) supports will be critical to ensure Head Start programs can implement the new standards, and some programs will need more help than others. Many Head Start programs are administered by community action agencies, or nonprofit agencies that also provide a range of services beyond ECE (Doran et al. 2022). As the notice states, the proposed wage standards will vary in opportunities and challenges across different types of organizational structures and agencies. For instance, agencies that provide Head Start services, in addition to a range of other ECE or social services, and employ Head Start educators, will need to attend to internal equity in pay scales by education, experience, and roles and responsibilities while working toward external parity with educators in public schools. Many of these agencies receive a variety of public and private revenues that they maximize to provide services, and they might be limited in how they can shift resources to increase compensation. There will be a substantial need for TTA supports to help agencies find a way to meet the Head Start wage standards within larger organizational funding mechanisms and salary structures. Programs with fewer supports and a greater burden to implement the changes would need more intensive TTA to develop pay scales, improve benefits, assess associated costs, and shift resources toward compensation. Therefore, it will be important to assess the TTA system’s capacity to support Head Start programs in this area.

Conclusion

The proposed changes to HSPPS have the potential to alter the ECE landscape greatly, beyond the Head Start program. Mathematica believes the changes to wages, along with increased attention on the mental health and wellness needs of staff, children, and families, can improve Head Start programs for educators and the vulnerable families they serve. Technical assistance and research can continue to inform implementation and ensure programs have needed supports.

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