



## Restoring Flexibility to Support Head Start Program Access

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Thank you for the opportunity to comment on the Administration for Children and Families (ACF)'s proposal to remove requirements related to Head Start workers' wages and benefits as outlined in the 2024 rule, *Supporting the Head Start Workforce and Consistent Quality Programming*.

While I submit this comment in an individual capacity as a private citizen, my scholarship informs my perspective. As an Assistant Professor of Labor History in the School of Industrial and Labor Relations at Cornell University, my research focuses on the history of labor, care work, and social policy, including the development of the childcare workforce and public policies affecting early childhood educators. I am writing a book that examines how various groups of Americans, including federal policymakers, entrepreneurs, and childcare workers, have grappled with the challenge of building and sustaining a workforce to meet childcare demand.

Throughout the twentieth century, efforts to expand childcare services frequently depended upon workers who received wages and benefits **well below** those earned by workers with comparable levels of responsibility and skill. Wages of Head Start workers have grown **particularly slowly**, despite substantial advances in Head Start workers' educational attainment. This reliance on a low-wage workforce compensated by the "intrinsic rewards" of care work has come at a high cost to the quality of care and to children's well-being: when wages are too low to meet basic needs, workers leave the field. **Rates of turnover** in childcare are sixty-five percent higher than the national median occupation.

The Notice of Proposed Rulemaking argues that the 2024 wage and benefit standards, which were adopted in response to the longstanding workforce challenges within Head Start and the broader early childhood sector, impose excessive costs and may force reductions in funded enrollment. It gives little attention, however, to the costs of maintaining a low-paid and unstable workforce, which include recruitment, hiring, and training. In addition to the financial costs, constant turnover of adult caregivers strains children's emotional well-being and prevents centers from building a consistent staff of experienced providers. Research shows that children **thrive** when they are cared for by adults whose working conditions support effective practice and workforce stability. The agency acknowledges that competitive wages and benefits matter for recruitment and retention and that staffing shortages remain a challenge. Yet it proposes eliminating the principal federal standards designed to address those challenges.

For these reasons, I urge ACF to withdraw the proposed rescission, which is likely to have adverse effects both on Head Start workers and on the children they serve.