



Restoring Flexibility to Support Head Start Program Access

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Thank you for the opportunity to comment on ACF-2026-0364. My name is Roger Figueroa, and I am an assistant professor of social and behavioral sciences in nutrition at Cornell University. I am trained as a social scientist in public health, and for the last 10 years, I have led or collaborated in multiple research studies about Head Start to demonstrate its capacity to improve the health of students and families.

In my prior research in partnership with Head Start program staff and families in Massachusetts, we learned about the importance of collaborating with Head Start when working to improve family health. Working with Head Start on health initiatives increased parent engagement in public health activities, and was a valuable academic-community partnership.

ACF proposes to remove wage and benefit requirements from the Head Start Program Performance Standards to add local flexibility and improve access to quality services in Head Start. I oppose these proposed rule changes and offer the following considerations:

Removing the staff wage and benefit requirements from the Head Start performance standards will disrupt program operations and inhibit economic impact across U.S. communities. The economic benefits of Head Start are clear. Each \$1 increase in Head Start budgets annually returns approximately \$8 back to the community through small businesses, jobs (such as Head Start staff employment), and reduced government dependence. The proposed rule implies that local Head Start budgets would be tighter and resources would be scarcer for Head Start operations and regular programming. This ultimately leads to disinvestment in the communities that many Head Start administrators, staff, and families live, work, and learn in. **ACF should reconsider this rule proposal to maximize job security for early care and education professionals in Head Start yielding a high return in investment.**

Removing the staff wage and benefit requirements from the Head Start performance standards worsens quality services in Head Start. While the proposed rule could provide local flexibility to tailor hiring practices and capacity needs to specific communities, it would add vulnerability to the early childhood education workforce who already experience burnout, exclusion, and stress as frontline workers in their field. By not guaranteeing competitive wages and benefits to these early care and education professionals, Head Start programs are less likely to adhere to other performance standards, such as: (1) aligning child nutrition services with Dietary Guidelines for Americans, and (2) using data infrastructure to identify program strengths and needs. These changes would compromise program reach, parent engagement in services, and hours of service at the Head Start center level.

The proposed rule also compromises Head Start organizational readiness and capacity. Such a rule would prevent all staff, consultants, and contractors engaged in the delivery of program services from having

sufficient knowledge, training and experience, and competencies to fulfill the roles and responsibilities of their positions and to ensure high-quality service delivery. **ACF should consider alternatives to the Proposed Rule that are not only financial, but that could bring social and public health benefits by retaining program quality standards.**

My comments reflect my research and expertise and are not a reflection of the opinion of Cornell University.