



MASSACHUSETTS  
**Department of  
Early Education and Care**

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June 11, 2026

Director of Policy and Planning

Office of Head Start, Administration for Children and Families

Department of Health and Human Services

330 C Street SW, 4th Floor

Washington, DC 20201

Re: Comments on *RIN 0970-AD21: Restoring Flexibility to Support Head Start Program Access*

Dear OHS Director of Policy and Planning:

On behalf of the Massachusetts Department of Early Education and Care (EEC), I submit this public comment in opposition to the Trump Administration's proposed rule "*Restoring Flexibility to Support Head Start Program Access.*"

In January 2024, EEC [submitted public comment](#) in support of the proposed rule *Supporting the Head Start Workforce and Consistent Quality Programming*. In those comments, we expressed strong support for the efforts to strengthen and stabilize the Head Start workforce through progress toward compensation parity with public school educators. We also emphasized the need for sufficient federal funding to implement this expectation in order to address the workforce shortages and compensation challenges contributing to classroom closures and reduced enrollment capacity in some programs.

Early education is foundational to closing the opportunity gap, bringing economic security and mobility to families, as well as educational opportunities to their children. Access to affordable child care is also an engine of the state's economy, enabling families of all income levels to participate in our workforce. In Massachusetts, many Head Start programs participate in our Child Care Financial Assistance programs, so all children—regardless of funding source—are served within the same program or classroom. As such, changes made to Head Start directly and indirectly impact every child care program, and the children they serve, in our state.

In Massachusetts, we continue to see the impact that meaningful investments in our early education and care workforce can have not just on the lives of educators, but also in their classrooms and on the children and families they support. Addressing the early childhood workforce crisis requires sustained partnership among federal, state, and local governments. Massachusetts Head Start programs continue to face significant compensation disparities compared to public school settings, contributing to ongoing recruitment and retention challenges.

The new proposed rule would move in the wrong direction. By rescinding wage and benefit requirements and removing expectations related to compensation parity, the rule would undermine workforce stability and weaken efforts to recruit and retain qualified educators. Greater compensation variability across programs and regions would make it more difficult for Head Start programs to compete for staff, potentially leading to additional classroom closures, reduced program capacity, and decreased access for low-income children and families.

EEC therefore opposes the proposed rule and urges the Administration to work with Congress to improve wages and compensation to ensure that our skilled Head Start educators are compensated fairly and competitively. Sustained investment in the Head Start workforce is critical to maintaining stable, high-quality early education services for children and families.

Sincerely,



Amy Kershaw  
Commissioner