



# Wages and Pay Parity

To help Head Start programs implement the wages and pay parity standards at Personnel policies, 45 CFR §1302.90, this document includes:

1. [Background](#) on pay parity in the updated Head Start Program Performance Standards (the Performance Standards)
2. [Regulation Summary](#) of 45 CFR §1302.90(e)
3. [Visual Examples of Pay Parity](#), including what pay parity is not and what it could look like
4. [Understanding Wage Policy Flexibilities](#) offered in the updated Performance Standards
5. [Tips for Getting Started](#) features a six-step approach to planning
6. [Small Agency Examples](#) provides an overview of which recipients qualify for the small agency exemption
7. [Resources](#) to support programs to make progress toward pay parity

## Background

Head Start programs across the nation are experiencing a staff shortage with turnover at its highest point in two decades. This severely impacts the ability of programs to fully enroll classrooms and provide consistent high-quality services to children and families. Low wages and poor benefits — despite increased expectations and requirements for staff — are a key driver of rapidly increasing staff turnover.

The updated Performance Standards include new requirements for Head start programs to make progress toward pay parity in the next seven years. Competitive compensation will enable programs to recruit and retain highly skilled staff who facilitate education service delivery and high-quality interactions as well as support children's safety and development. There are four areas of wage requirements for Head Start staff:

- **Parity 1302.90(e)(1):** Education staff working directly with children as part of their daily job responsibilities must receive a salary comparable to preschool teachers (or 90% of kindergarten teachers) in public school settings in the program's local school district, adjusted for qualifications, experience, job responsibilities, and schedule or hours worked.
- **Pay Scale 1302.90(e)(2):** Programs must establish or enhance a salary scale, wage ladder, or other pay structure that applies to all staff in the program and takes into account job responsibilities, schedule or hours worked, and qualifications and experience relevant to the position.
- **Salary Floor 1302.90(e)(3):** All staff must receive a salary that is sufficient to cover the basic costs of living in their geographic area, including those at the lowest end of the pay structure.

### Compliance Date: August 1, 2031

Programs are expected to begin planning and making progress toward these requirements immediately. However, the wage standards do not need to be fully implemented until Aug. 1, 2031.

- **Wage Comparability 1302.90(e)(4):** Wages across Head Start Preschool and Early Head Start staff positions must be comparable.

## Regulation Summary

The following is a summary of the new standards related to wages and pay parity. Please see [45 CFR §1302.90\(e\) of the Head Start Program Performance Standards](#) for the full text.

<b>Citation</b>	Wages 1302.90(e)
<b>Compliance Date</b>	Aug. 1, 2031
<b>Performance Standard Summary</b>	<p>Programs must:</p> <ul style="list-style-type: none"> <li>• Establish or update a pay scale for all positions</li> <li>• Pay Head Start educators comparable to public school preschool teachers (or 90% of kindergarten teachers), as a marker of progress to pay parity for Head Start staff with K–3rd grade teachers</li> <li>• Pay all staff a wage at least sufficient to cover basic costs of living</li> <li>• Pay comparable wages across Head Start Preschool and Early Head Start programs</li> </ul> <p>Small Head Start agencies with 200 or fewer slots are exempt from most of the wage requirements. However, these agencies must still develop or update a pay scale that promotes competitive wages for all staff and make measurable progress toward reducing disparities in wages between Head Start educators and public preschool teachers over time.</p> <p>The final rule that updated the Performance Standards includes an option for the Secretary of the Department of Health and Human Services (HHS) to establish in 2028 a limited waiver process for most of the wage requirements for eligible programs, if the prior four years of appropriation increases for Head Start funds are less than an annual average of 1.3%.</p>

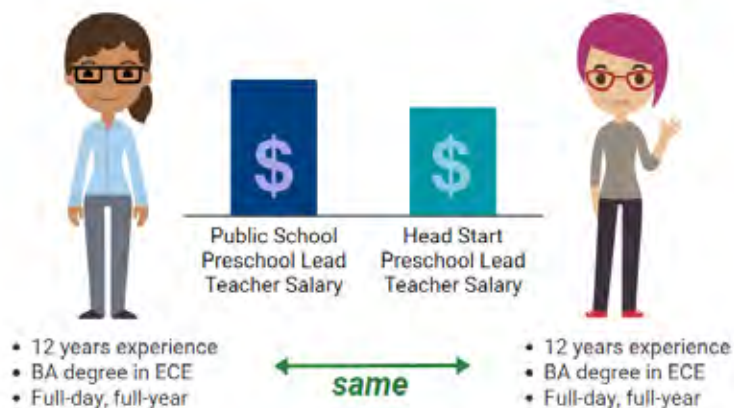
## Visual Examples of Pay Parity

Programs have a lot of flexibility in how they determine comparable salaries and adjust based on role, responsibilities, qualifications, experience, and schedule or hours worked. This section includes several visual guides representing various definitions of what pay parity is or is not.

### Examples of What Parity Is Not

#### Different salaries for the same experience, education, and responsibilities is not parity.

A public school lead teacher and a Head Start lead teacher with equivalent experience, education, and roles and responsibilities who do not earn the same salary is not parity.



#### Equal salaries for different levels of education is not parity.

A public school lead teacher and a Head Start lead teacher with equivalent experience and roles but different levels of education making the same salary is not parity.



#### Adjusting salaries based on the age group being taught is not parity.

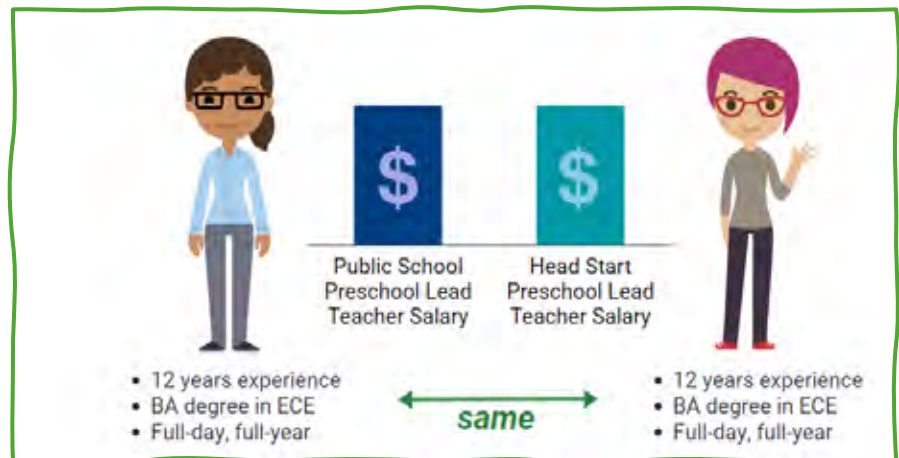
An Early Head Start lead teacher and a Head Start Preschool lead teacher with the same experience, education, and responsibilities making different salaries is not parity.



## Examples of What Parity Could Look Like

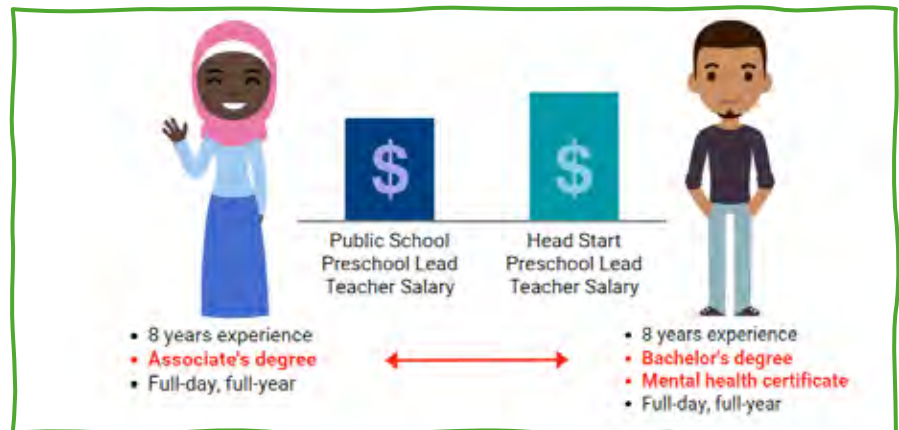
### Parity could look like the same salary for the same experience, education, and responsibilities.

A public school preschool lead teacher and a Head Start preschool lead teacher making the same salary with the same experience, education, and responsibilities would be an example of parity.



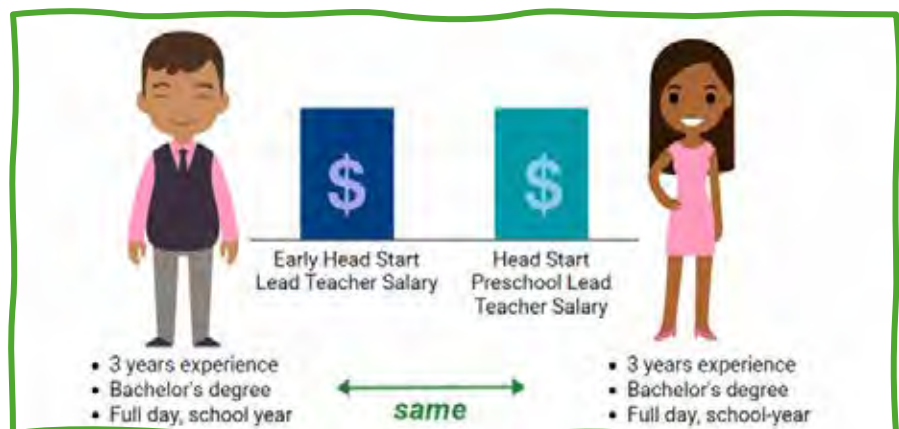
### Parity could look like adjusting salary based on level of education.

A Head Start teacher should make more than a public school preschool lead teacher if they have higher levels of education but the same experience and responsibilities.



### Parity could look like the same salary across age groups for the same experience, education, and responsibilities.

A Head Start lead teacher and an Early Head Start lead teacher with the same experience, education, and responsibilities should have equal pay, regardless of the age group they are working with.

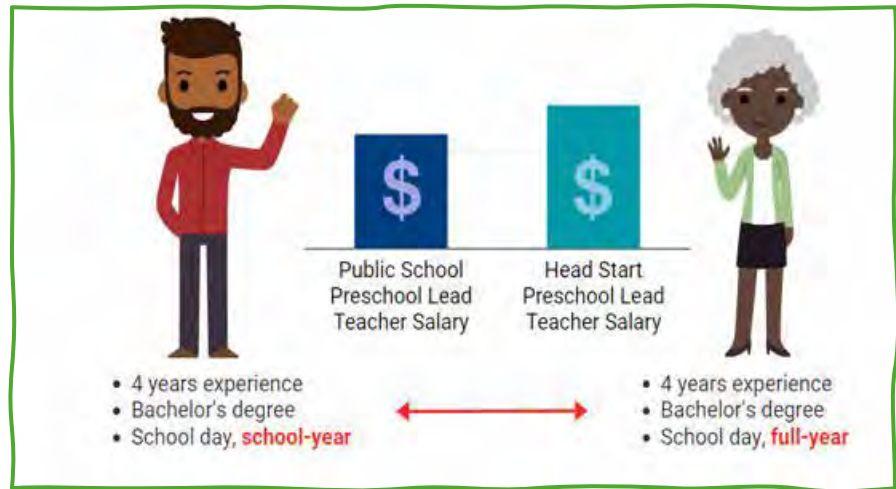




## Examples of What Parity Could Look Like

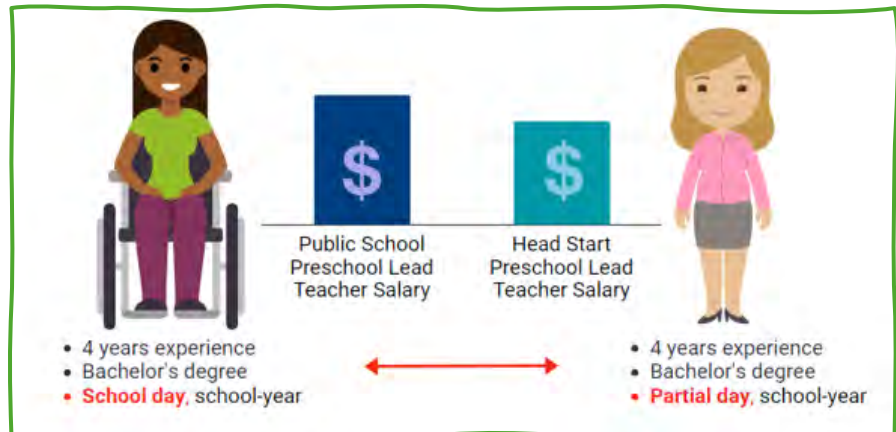
### Parity could look like adjusting salary based on the number of days worked per year.

A Head Start teacher should make more than a public school preschool lead teacher if they are expected to work more days per year than the public school teacher.



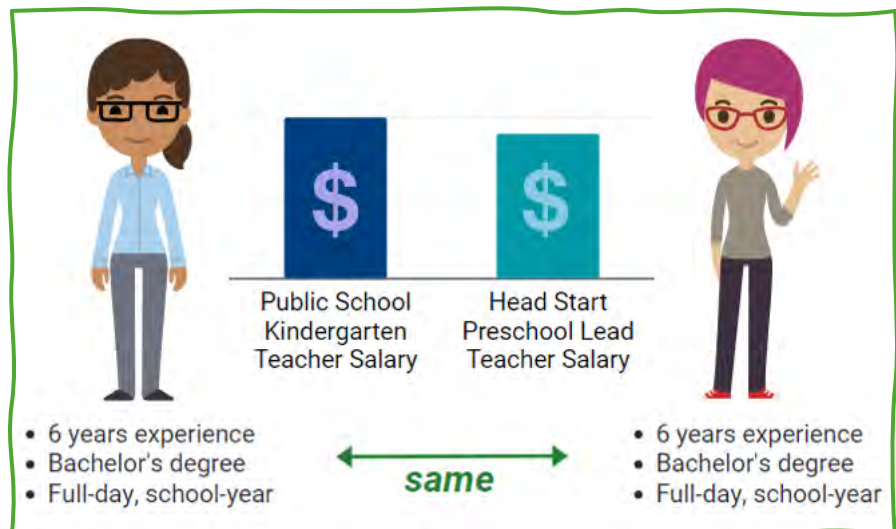
### Parity could look like adjusting salaries based on the number of hours per day worked.

Paying a Head Start teacher less than a public school teacher when they are expected to work fewer hours per day is reflective of parity.



### Parity could look like aligning salaries to 90% of kindergarten teacher salaries.

A Head Start teacher could make 90% of a kindergarten teacher's salary if their experience, education, and responsibilities are aligned.



# Understanding Wage Policy Flexibilities

## **Why is there such a focus on increasing wages and benefits for Head Start staff?**

Head Start staff are the cornerstone of delivering high-quality early care and education services. Research shows that better-compensated staff are more likely to remain in their positions, leading to stable relationships with children, which is essential for their development. By requiring competitive wages and benefits in the Performance Standards, the program aims to reduce turnover and improve the overall quality of services.

Head Start programs have faced unprecedented turnover and child health and safety incidents in recent years, necessitating these changes.

## **Will there be additional funding to help programs meet the new requirements without reducing slots?**

The updated Performance Standards are designed to maintain high-quality Head Start services, which includes ensuring staff are fairly compensated. Programs are encouraged to plan for gradual implementation of the new requirements. The Office of Head Start (OHS) will provide ongoing guidance on how to leverage existing resources to maximize service levels while improving staff compensation. Gradual implementation may involve programs restructuring their service models through the Change in Scope process in alignment with their community needs assessment. While additional funding is not always available, the Head Start program has a long history of bipartisan support in Congress. We look forward to continuing to partner with Congress to meet the needs of children and families across the country while maintaining the standard of excellence for which Head Start programs are known. The updated Performance Standards also include an option for the HHS Secretary to establish a limited waiver process if federal appropriations do not increase sufficiently over a set period.

## **What should programs do if they are fully enrolled and anticipate struggling to meet the new wage requirements?**

Programs that are fully enrolled and anticipate challenges in meeting the new wage requirements should begin planning how to comply over the next several years. The full implementation of the wage standards will not occur until 2031, allowing programs time to adjust. Programs are encouraged to assess and restructure their budgets, as well as explore options such as reallocating funds, reducing slots through a Change in Scope request, or identifying other efficiencies. OHS will provide technical assistance to help programs navigate these changes, ensuring they can maintain service quality while working towards meeting the new standards.

## **What are the exemptions for small agencies with 200 or fewer funded slots, and why is there additional flexibility for these programs?**

Acknowledging the challenges small programs face with limited enrollment numbers and staff, Head Start agencies with fewer than 200 slots are not subject to many of the wage and benefits requirements. However, these programs are still required to develop and update a pay scale and make measurable improvements in compensation for Head Start educators over time. These flexibilities are available to small agencies with 200 or fewer total slots given the lack of economies of scale in these programs. The Administration for Children and Families (ACF) will work with grant recipients to minimize any disparities between wages and benefits offered in small and larger Head Start agencies.

## Tips for Getting Started

**Step 1: Identify the roles that will be included in the salary scale.** The updated Performance Standards requires that all staff are included in your salary scale. This will look different from program to program. Based on your current staffing and future staffing plans, create a list of roles.

**Step 2: Define the minimum qualifications for each role.** Consult applicable policies that are already in place; the Performance Standards outline the minimum qualifications for some staff in 45 CFR §1302.91. You may have additional state or local requirements to consider or your own program policies that are more stringent or detailed than what is in the Performance Standards.

**Step 3: Assess the base wages.** Identify the minimum wage that would allow staff to afford necessities in the local area (see resources on this below). This will serve as your salary floor, as described in 45 CFR §1302.90(e)(3).

**Step 4: Identify comparable salaries for each role.** For education staff, this must be pre-K or kindergarten teachers in the public school district, or a neighboring district when applicable. This step will involve gathering data from online and partner organizations.

**Step 5: Build out salary bands.** No bands should be lower than the salary floor that you establish. Education staff bands must be aligned to public school teaching salaries, as required. Bands should allow for adjustments for role, responsibility, qualifications, experience, and schedule or hours worked. Establish clear policies for how salaries will be adjusted for these factors to ensure consistency and equity.

**Step 6: Assess the cost.** These changes do not need to happen all at once. It will be helpful for planning purposes to understand how much it will cost to implement the salary scale as designed. From that, begin planning for incremental implementation between now and August 2031.

## Small Agency Examples

**Exemption:** *Small Head Start agencies with 200 or fewer slots are exempt from most of the wage requirements. However, these agencies must still develop or update a pay scale that promotes competitive wages for all staff and make measurable progress toward reducing disparities in wages between Head Start educators and public preschool teachers over time.*

### How does the “200 or fewer slots” work for grant recipients that have multiple grants?

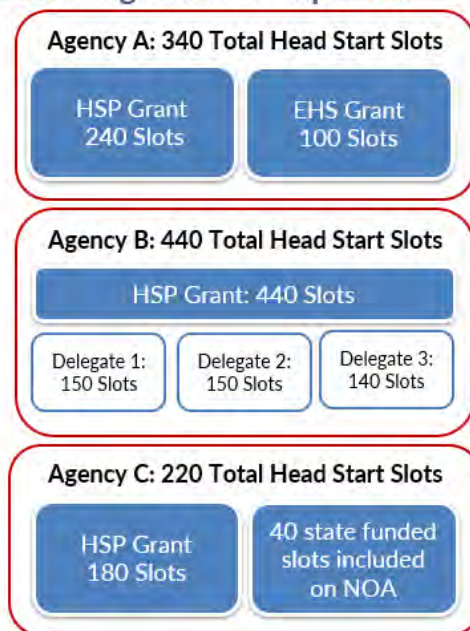
Recipients should total their funded enrollment across all their grants, regardless of whether those slots are served in Early Head Start-Child Care Partnership sites or delegate agencies, to determine if they have 200 or fewer slots.

### How are state-funded slots factored into total funded enrollment for the small program exemption?

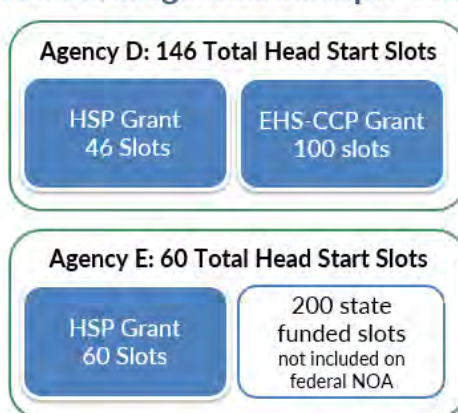
State-funded slots are included in the “200 or fewer” count if they are used as nonfederal share match and are factored into the total funded enrollment on the Notice of Award.

Below are examples of how the small agency exemption applies:

#### Are these agencies exempt? **NO**



#### Are these agencies exempt? **YES**





## Resources

The following ACF resources exist to support Head Start programs in planning and implementing the Performance Standards.

- **Early Care and Education Workforce Salary Scale Playbook**: This guide provides practical guidance on five essential actions in the process of building and implementing a comprehensive, equitable salary scale for early educators and caregivers. This resource includes examples of how Head Start programs and states approached aspects of scale development, including how salaries were adjusted for role, experience, qualifications, etc. Check out the [related webinar](#) to learn more.
- § **Essential Action One-pagers**: As you begin planning to implement the salary scale requirement, the Child Care Technical Assistance Network has a series of one-pagers to help navigate each step of the process.
  - [Articulate the Need for and Value of a Salary Scale](#)
  - [Convene Key Partners to Guide Salary Scale Development](#)
  - [Identify and Use Data](#)
  - [Develop a Salary Scale Structure](#)
  - [Create an Implementation Plan](#)

The following resources may be helpful to programs in beginning to conduct research on setting a salary floor. However, programs should review each resource and consider how they can be used as one resource to inform program decisions about how to ensure that wages allow for staff to meet basic needs. ACF does not endorse any of these tools.

- § **Living Wage Calculator** (Massachusetts Institute of Technology) helps individuals, communities, employers, and others estimate the local wage rate that a full-time worker requires to cover the costs of their family's basic needs where they live.
- § **The Self-sufficiency Standard** (Center for Women's Welfare of the University of Washington) is a budget-based, living wage measure that defines the real cost of living for working families at a minimally adequate level.
- § **Family Budget Calculator** (Economic Policy Institute) measures the income a family needs to attain a modest yet adequate standard of living. The budgets estimate community-specific costs for 10 family types (one or two adults with zero to four children) in all counties and metro areas in the United States.