NATIONAL HEAD START ASSOCIATION

What the Change in Scope Data Shows

Head Start's enrollment reductions followed mounting workforce pressures amid flat federal funding

National Head Start Association | August 2026

In a July 2026 Data Point briefing, the Department of Health and Human Services Office of the Assistant Secretary for Planning and Evaluation (ASPE) reported that Change in Scope (CIS) requests from Head Start programs nationwide rose from 104 in FY21 to 886 in FY24. It links that increase with 97,625 funded-slot reductions across Head Start programs. The brief closes by recommending that the Administration for Children and Families "consider re-evaluating how Change in Scope applications are approved." [1]

Federal funding remained flat as local wages rose, leaving Head Start programs with fewer resources for competitive wages and benefits. Staffing shortages followed, and enrollment fell below funded capacity. Programs then filed Change in Scope requests to align their grants with the number of children they could serve. The national data show that workforce shortages preceded the increase in requests.

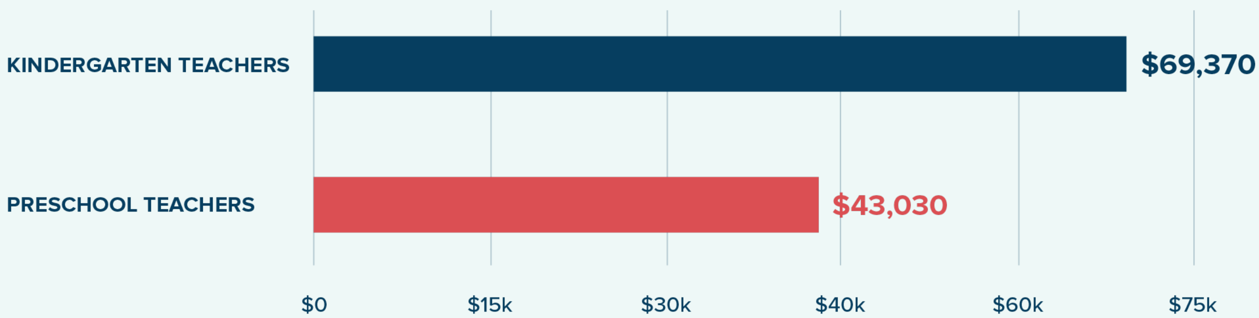
Head Start cannot match the labor market

Much The Data Point notes that CIS requests to reduce enrollment drove nearly all of the increase, growing more than nineteenfold. Yet why were so many grantees under-enrolled? The brief offers no account of the forces driving the requests. Other data sources, closer to the ground, help explain what led these programs across the country to conclude they could no longer staff or fill all of their funded slots.

Head Start programs compete for staff with public schools that pay substantially more and employers offering similar or better entry-level wages.

Teacher pay in the labor market Head Start competes in

Average annual pay, United States, May 2025



ANNUAL PAY GAP **$26,340**

Source: U.S. Bureau of Labor Statistics, Occupational Employment and Wage Statistics, May 2025.

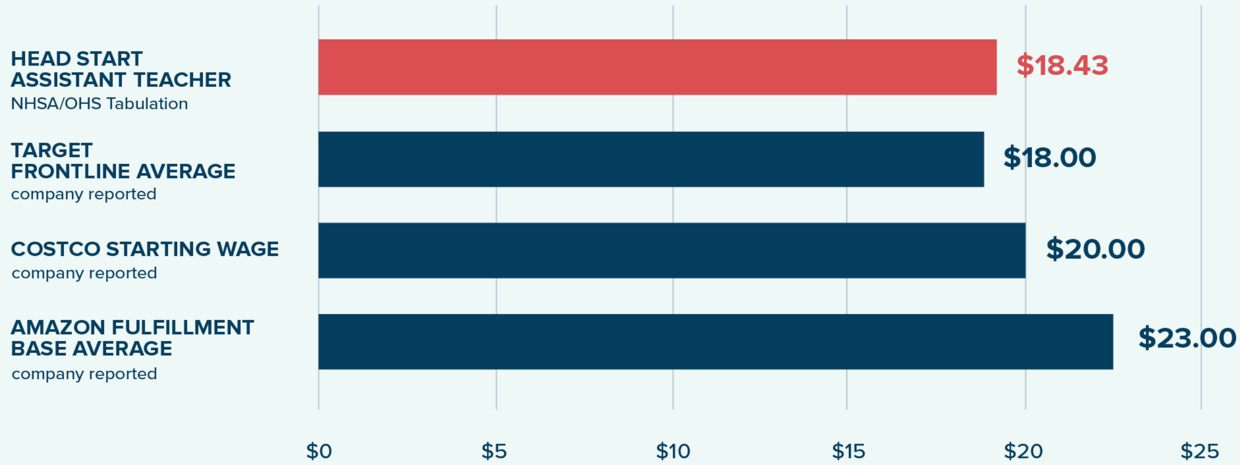
An analysis by the National Institute for Early Education Research (NIEER) used national wage data to compare preschool and kindergarten teacher wages. Applying that comparison to Head Start shows that a teacher with a bachelor's degree earns 64 percent of average K–12 public school teacher pay, a difference of about $26,500 per year. The gap appears in every state; the District of Columbia is the only jurisdiction at parity. In inflation-adjusted dollars, average Head Start teacher pay barely changed between 2010 and 2023 even as the share of teachers with bachelor's degrees rose from 45 percent to 70 percent.

A Government Accountability Office (GAO) review of selected Tribal Head Start programs identified similar challenges. Of the ten programs interviewed, nine reported struggling to recruit and retain staff. One program described paying teachers with early-childhood degrees $40,000 while the local district offered $55,000 for comparable roles.

GAO's national data shows this same wage pressure at scale. Tribal programs lost 16 percent of their staff between 2020 and 2023; fewer than half of those positions were refilled. Many departed staff moved into other early childhood programs; they left Head Start for similar work but with better compensation. Others left for different sectors. At $18.43 an hour, an average Head Start assistant teacher earns less than a new hire at Amazon or Costco.

Hourly wages in the entry-level labor market

Selected Head Start and large-employer benchmarks, 2025



Sources: NHSA tabulation of OHS salary data. Other figures are national company-reported benchmarks.

Vacancies and under-enrollment came first

Nationally representative data from Program Information Reports show an emerging problem before Change in Scope requests increased. In 2021, 133,183 funded slots went unfilled. By 2022, programs reported 9,088 teacher vacancies that had remained open for at least three months. Together, these data show that programs were already struggling to staff classrooms and fill their funded capacity well before the CIS request increase.

Workforce and enrollment pressure preceded the Change in Scope wave

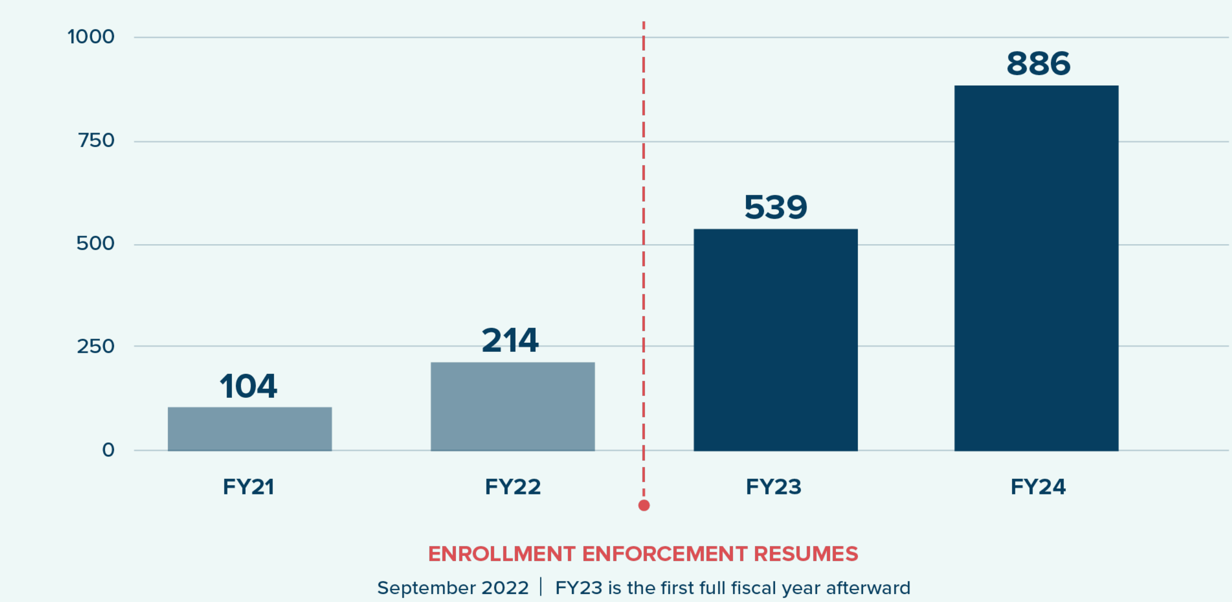
Selected Head Start and large-employer benchmarks, 2025

Sources: Head Start Program Information Report, program years ending 2021–2022; ASPE, July 2026.

The federal response came next. OHS resumed "Full Enrollment Initiative" enforcement in September of 2022. The initial focus was on programs serving fewer than half of their funded enrollment. Two months later, it confirmed that enrollment reductions had to move through the Change in Scope process. Under-enrollment letters (and the prospect of funding reductions) began reaching programs in early 2023. By 2024, the workforce rule acknowledged that without adequate funding to meet the new compensation standards, programs might have to cut slots.

Change in Scope requests rose after enrollment enforcement resumed

Requests submitted, by federal fiscal year



Sources: ASPE, July 2026; OHS enrollment guidance and Full Enrollment Initiative materials.

Funding fell short of the path ACF assumed

The funding pressure did not ease after Change in Scope requests began to rise. ACF priced its 2024 workforce rule on the assumption that Head Start funding would reach $12.882 billion in 2026. Congress ultimately provided $12.357 billion, roughly $525 million less than ACF's model anticipated. For programs already struggling to match local wages, that gap made it even harder to hire and retain qualified staff.

Conclusion

The Data Point briefing makes a category error by treating Change in Scope as the source of the decline, even though CIS merely formalized reductions that followed years of staffing shortages and under-enrollment. Programs had spent years trying to operate in labor markets where they struggled to compete for staff. When they could no longer staff all of their funded classrooms, they were forced to use CIS to bring their grants into line with what they could sustain. Changing how those requests are approved will not fix the conditions that led programs to file them in the first place. HHS should look at why each program turned to CIS and what it was facing at the time. That means looking at the wages it could offer, whether it could fill open positions, and how many children it was staffed to serve.

Sources

Assistant Secretary for Planning and Evaluation. “Increases in Head Start Change in Scope Requests from FY21 to FY24 Have Resulted in the Largest Reduction of Funded Slots in the History of Head Start.” July 2026.

Head Start Program Information Report exports, program years ending 2019–2025. National calculations of funded enrollment and vacancies.

U.S. Bureau of Labor Statistics. Occupational Employment and Wage Statistics, May 2019–May 2025, and National Compensation Survey retirement-plan participation data.

Healy, O., Fidel, S., and Barnett, W. S. “The Real Cost of Rolling Back Head Start Wage Requirements.” National Institute for Early Education Research, June 2026.

U.S. Government Accountability Office. “Head Start: Office of Head Start Could Improve Communication with Tribal Programs.” GAO-26-107775, 2026.

Office of Head Start. ACF-PI-HS-18-04, Full Enrollment Initiative; ACF-PI-HS-21-04, enrollment tracking reinstatement; ACF-IM-HS-22-09, enrollment reductions and slot conversions.

Head Start Act, Section 641A(h), 42 U.S.C. 9836a(h).

Supporting the Head Start Workforce and Consistent Quality Programming, 89 Fed. Reg. 67720, Aug. 21, 2024.

Target pay fact sheet, Dec. 2025; Amazon pay announcement, Sept. 2025; Costco published starting wage, 2025. Company-reported national averages or starting wages are not directly comparable occupational estimates.

Consolidated Appropriations Act, 2026, P.L. 119-75. Head Start received $75 million for a cost-of-living adjustment. Social Security Administration. “2026 Cost-of-Living Adjustment (COLA) Fact Sheet.” October 2025.