



At the Breaking Point:

Addressing the AIAN Head Start Workforce Crisis

Urgent Federal Action Needed to Stabilize Tribal Early Childhood Programs and Honor Indigenous Knowledge

American Indian and Alaska Native (AIAN) Head Start programs are facing a workforce crisis that directly threatens their ability to maintain full enrollment and deliver high-quality, culturally grounded early childhood education. Chronic underfunding, rigid degree requirements, limited recognition of Indigenous knowledge, and non-competitive salaries have made it increasingly difficult for programs to recruit and retain qualified teachers. The consequences are severe: empty classrooms, reduced access to services for AIAN families, and potential loss of funding due to under-enrollment. Addressing these interconnected challenges is essential not only to stabilize the workforce but also to uphold the federal trust responsibility to Tribal Nations and preserve Tribal sovereignty in early childhood education. Federal policy must honor Indigenous expertise, invest in workforce development, and ensure that AIAN programs are empowered to meet local needs in culturally meaningful ways.

In 2024 only 60% of the 667 education and child development staff that left AIAN Head Start programs were replaced. 47% of those who left did so for higher compensation. (2024 PIR)

Key Issues & Recommendations

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Issue – Degree Requirements Limit Hiring and Retention of Qualified AIAN Teachers

Standard degree programs rarely incorporate indigenous knowledge, pedagogies, and cultural practices. The degree requirements in the Head Start Act undervalue experience and personal commitment to community values as compared to formal education. Many elders, culture bearers, and community members are excluded from teaching despite their extensive practical experience and cultural expertise. This lack of recognition for indigenous knowledge can undermine the importance of indigenous ways of knowing and learning that are crucial for effective teaching in Tribal Head Start programs.

In addition, obtaining a degree often involves significant financial costs to both the teacher and the program. Many AIAN communities have limited access to higher education institutions, particularly those offering early childhood degrees that reflect Indigenous perspectives. For many prospective teachers, pursuing a degree may require travel, relocation, or online learning in areas with unreliable internet access — all of which create additional barriers. To help staff overcome these challenges, Tribal Head Start programs often invest heavily in their professional development. However, once teachers earn their degrees, they are frequently recruited by local school districts or other employers offering higher salaries and benefits. This creates a costly and unsustainable cycle in which programs must continually train new educators, further straining already limited budgets and disrupting classroom stability for children and families. Without the ability to offer salaries that are competitive with local school districts, programs are unable to retain the very teachers they've worked so hard to support—fueling a workforce crisis that directly impacts enrollment and service delivery.

AIAN program Teachers that met the minimum degree qualifications (2024 PIR)	
Preschool Classroom Teachers	76%
Preschool Assistant Teachers	44%
Infant and Toddler Classroom Teachers	67%

33.5% of all AIAN Teaching staff have no degree or credential.

Current Partial Solution: Tribal Colleges and Universities (TCU) Head Start Partnership Programs

The TCU-Head Start Partnership Program increases the number of qualified education staff working in AIAN Head Start programs. The plans proposed by the currently awarded institutions include: providing strong, personal support for enrollees; flexibility in course delivery and design; the ability to provide preliminary or remedial instruction; assistance with tuition, books, and other costs (transportation, child care, etc.); articulation agreements that permit transfer of credit; and providing credit for professional experience. TCU-Head Start Partnership Programs help address the employment needs of AIAN Head Start programs while being responsive to the cultures and languages of Native tribes through a “Growing Our Own” approach. However, this approach does not address the exclusion of Native elders or culture bearers who are unwilling or unable to attain a degree. Nor does it resolve the issue of workforce attrition caused by non-competitive pay—many teachers who earn degrees with program support ultimately leave for better-compensated positions, creating a recurring loss of investment and instability in the classroom.

Current Inadequate Strategy: Waivers

The Office of Head Start currently has authority to offer conditional and time-limited waivers of minimum credential requirements for Head Start center-based preschool classroom teachers. To qualify for a waiver, programs must provide evidence they have unsuccessfully attempted to recruit an individual who has at least an associate degree in Early Childhood Education, evidence the individual for whom a waiver is requested is enrolled in a program that grants a qualifying associate or higher degree in a reasonable time (not to exceed three years), and that the individual has a current CDA or equivalent (or is awaiting the award of the CDA or equivalent).

The need to request waivers for teacher degree requirements presents several challenges, including extensive documentation and evidence, approval delays that affect immediate staffing needs, and a lack of consistency in the approval process. Moreover, the three-year time limitation is often unrealistic for staff who are working full-time, raising families, or participating in traditional subsistence

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practices. Our experience is that the waiver process does not adequately recognize or value Indigenous knowledge, which is crucial in culturally grounded teaching environments.

In addition, there is **currently no waiver authority for infant and toddler center-based teachers in Early Head Start**. All Early Head Start teachers are required to have a Child Development Associate (CDA) credential before they can begin working in a classroom, unlike assistant teachers in Head Start preschool classrooms who may work toward their CDA while on the job. This restriction discourages potential Early Head Start teachers from entering the early childhood workforce, further compounding the staffing crisis and limiting access to affordable, high-quality care and education for Early Head Start-eligible families.

Proposed Legislative Solution: The HEADWAY Act (H.R. 336 / S.2323)

One practical federal solution to address workforce entry barriers—particularly for Early Head Start—is the **Head Start Education and Development Workforce Advancement and Yield (HEADWAY) Act**. The **HEADWAY Act** would reduce barriers to entry and strengthen career development supports by allowing Early Head Start programs to “grow their own” workforce. The bill would level the playing field between Head Start and Early Head Start by permitting newly hired Early Head Start teachers to begin work as the second teacher in a classroom while actively working toward their CDA credential. At least one fully CDA-credentialed teacher would still be required in every Early Head Start classroom, and a mentorship structure would be established to support new hires as they complete their credentialing.

This practical change would immediately expand the pool of eligible Early Head Start teacher candidates and help ensure long-term workforce stability, especially in Tribal and rural communities where access to training and credentialing pathways is limited.

For information on cosponsoring the HEADWAY Act, please contact:

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Recommended Solution: Allow Tribes to Certify Their Own Teaching Staff

Many Native elders and culture bearers do not meet Head Start’s formal teacher degree requirements, despite their lifetimes of lived experience, language fluency, and deep cultural knowledge. Empowering Tribes to certify their own teachers supports Tribal sovereignty and self-determination by restoring to them the power to shape key aspects of their educational programs in alignment with their unique values, priorities, and community needs.

This approach is consistent with existing Head Start policies that already recognize Tribal authority in other professional qualification and program governance areas. For example:

- ◆ **45 CFR §1302.45** allows a “licensed mental health professional” to also include a *behavioral health support specialist recognized by the Tribal government*;
- ◆ **45 CFR §1302.47** permits Tribal governments to meet their own licensing standards for health and safety; and
- ◆ **45 CFR §1301.2** recognizes Tribal governments as governing bodies.

Extending similar flexibility to educator credentialing is a logical and necessary step to ensure parity. Allowing Tribes to establish and recognize their own early childhood educator credentials—through Tribal governments, Tribal education agencies, or Tribal Colleges and Universities (TCUs)—would create culturally grounded, rigorous pathways into the Head Start workforce. These pathways can:

- ◆ Recognize and formalize the expertise of Native knowledge keepers and language speakers;
- ◆ Increase recruitment and retention of local staff who are deeply rooted in the community;
- ◆ Support culturally and linguistically responsive classroom environments;
- ◆ Help address staffing shortages, particularly in remote or underserved Tribal areas where access to Western higher education programs is limited.

This solution also addresses the deeper inequity in current federal policy: While Tribes are acknowledged alongside states in licensing and governance, they are not granted equivalent authority to define teacher qualifications that reflect Indigenous ways of knowing. This omission perpetuates systemic barriers

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and undermines the goals of culturally relevant, community-led early childhood education.

To fully realize the intent of the Head Start Act and fulfill the federal trust responsibility, Congress and

the Office of Head Start should authorize Tribes to create and adopt their own certification standards for teaching staff—standards that uphold both educational excellence and cultural integrity.

As such, NIHSDA has drafted the following suggested legislative language to amend the Head Start Act to allow Indian programs to establish their own certification standards for teaching staff.

SECTION 1. SHORT TITLE.

This Act may be cited as the “**Tribal Certification Standards for Head Start Educators Act.**”

SECTION 2. AMENDMENT TO THE HEAD START ACT.

(a) **Section 648A of the Head Start Act (42 U.S.C. § 9843a)** is amended as follows:

In subsection (a), after paragraph (3), insert the following new paragraph (4):

(4) TRIBAL CERTIFICATION STANDARDS FOR INDIAN PROGRAMS.—

(A) **In General.** Notwithstanding any other provision of this section, including 42 U.S.C. § 9843a(a)(3) and (4), and **Section 645A(h) of the Head Start Act (42 U.S.C. § 9840a(h))**, Indian Head Start programs and Early Head Start programs operated by Indian Tribes, Tribal organizations, or consortium of Tribes shall have the authority to establish and implement their own certification, credentialing, and qualification standards for teaching and support staff, provided such standards—

- (i) are culturally relevant and tailored to meet the unique needs of the children and families served;
- (ii) are designed to maintain or exceed the professional standards outlined in subsection 42 U.S.C. § 9843a(a)(1), with flexibility to waive degree requirements articulated in 42 U.S.C. § 9843a(a)(2) and (a)(3) and **42 U.S.C. § 9840a(h)** in favor of qualification based on cultural competence, relevant experience, community-based knowledge, or any other factor the Tribal governing body or Tribal education authority deems relevant and appropriate; and
- (iii) are approved by the Tribal governing body or Tribal education authority.

(B) **Consultation and Guidance.** The Secretary shall, upon request by the Tribal governing body or Tribal education authority, provide technical assistance to support Indian programs in developing and implementing standards under this section.

(C) **Reporting in Grant Applications.** Indian programs exercising the authority under this paragraph shall include the certification, credentialing, and qualification standards established pursuant to this paragraph as part of their grant application or renewal process, ensuring alignment with the goals and objectives of the program and compliance with this Act.

(D) Redesignate paragraphs 42 U.S.C. § 9843(a)(4) through (7) as paragraphs (a)(5) through (8).

SECTION 3. EXCLUSION FROM NATIONWIDE HEAD START TEACHER CREDENTIALING CALCULATION

Tribal Head Start programs shall be excluded from the Department’s calculation under 42 U.S.C. § 9843a(a)(2)(A) of the percentage of Head Start teachers nationwide with certain credentials.

SECTION 4. EFFECTIVE DATE.

This Act shall take effect upon the date of its enactment.

Fiscal Impact Statement

This proposal is budget-neutral and will not require additional federal funding, as it will be implemented within the existing appropriations for Tribal Head Start programs.

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Issue – Non-Competitive Salaries Prevent Hiring and Retention of Qualified Head Start Teachers in AIAN Programs

Despite the critical importance of high-quality early child care and education, the Early Childhood Education workforce is undervalued and poorly compensated. This issue is even more challenging for professionals who are Black, Indigenous, and people of color, who are also predominantly women. Salaries for early childhood educators are often lower compared to other professions requiring similar levels of education and responsibility, and the gap is even wider for women of color. Under-funding of

Head Start has left many programs in the challenging situation of being unable to provide salaries that are competitive with the local school district. This leads to high turnover rates, recruiting difficulties, staff feelings of being undervalued, and staff financial strain. These conditions negatively impact program quality, undermine community trust, and place a significant financial burden on the program which must invest in recruiting, training, and onboarding new staff. Many programs experience prolonged vacancies in teaching positions, leaving them unable to maintain full enrollment and children and families without services.

States with AIAN Head Start	Average Salary – AIAN Head Start Classroom Teachers	Average Salaries of Public School Teachers	AIAN HS Teacher Salary Shortfall	Percentage Less
Alaska	\$46,999	\$78,256	-\$31,257	40%
Arizona	\$46,903	\$62,714	-\$15,811	25%
California	\$44,311	\$101,084	-\$56,773	56%
Colorado	\$37,611	\$68,647	-\$31,036	45%
Idaho	\$38,438	\$61,516	-\$23,078	38%
Kansas	\$41,825	\$58,146	-\$16,321	28%
Maine	\$41,360	\$62,570	-\$21,210	34%
Michigan	\$32,051	\$69,067	-\$37,016	54%
Minnesota	\$41,998	\$72,430	-\$30,432	42%
Mississippi	\$33,326	\$53,704	-\$20,378	38%
Montana	\$37,089	\$57,556	-\$20,467	36%
Nebraska	\$42,496	\$60,239	-\$17,743	29%
Nevada	\$41,703	\$66,930	-\$25,227	38%
New Mexico	\$41,438	\$68,440	-\$27,002	39%
New York	\$39,437	\$95,615	-\$56,178	59%
North Carolina	\$40,665	\$58,292	-\$17,627	30%
North Dakota	\$31,135	\$58,581	-\$27,446	47%
Oklahoma	\$38,276	\$61,330	-\$23,054	38%
Oregon	\$43,838	\$77,130	-\$33,292	43%
South Carolina	\$30,643	\$60,763	-\$30,120	50%
South Dakota	\$35,605	\$56,328	-\$20,723	37%
Texas	\$39,143	\$62,463	-\$23,320	37%
Utah	\$26,277	\$69,161	-\$42,884	62%
Washington	\$51,376	\$91,720	-\$40,344	44%
Wisconsin	\$42,990	\$65,762	-\$22,772	35%
Wyoming	\$21,171	\$63,669	-\$42,498	67%
Average	\$38,773	\$67,774	-\$29,000	42%

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Current Inadequate Strategy: Change in Scope Requests

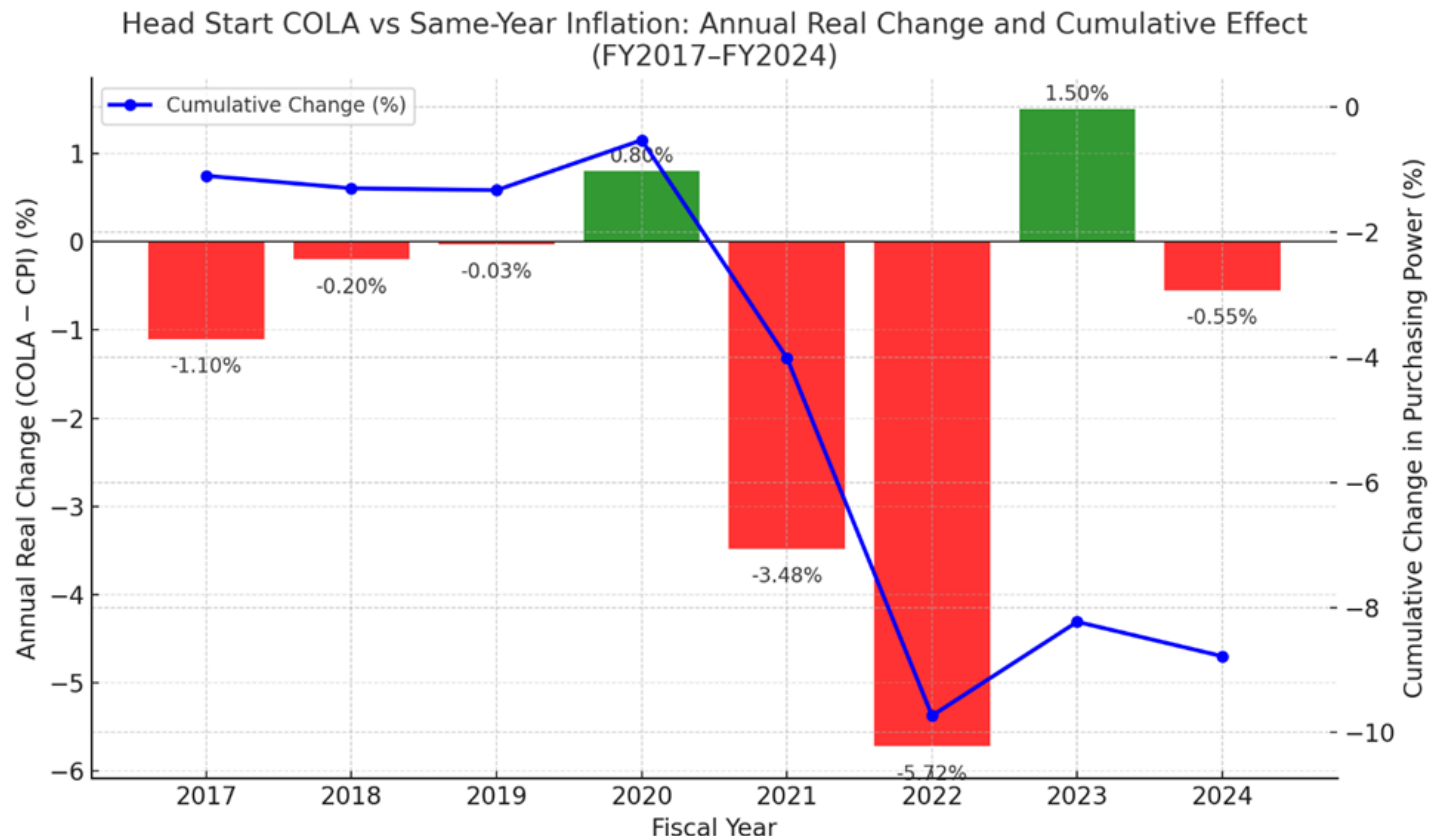
One strategy suggested by the Office of Head Start to increase compensation for Head Start staff is to reduce child enrollment to increase funding available for salaries through a change in scope request. This strategy is unsustainable as states continue to increase teacher pay in public schools and is not a viable option for small programs or programs that operate single classrooms in separate communities. This strategy also negatively impacts Native communities by reducing access for families who depend on these services, often in communities that already have no other options for early childhood education.

Since 2019, 30 AIAN Head Start grant recipients have reduced their funded enrollment by 1,073 slots (5% of AIAN funded slots).

Current Inadequate Strategy: Unfunded Mandated Salaries

The *Supporting the Head Start Workforce and Consistent Quality Programming* Final Rule requires that, by August 2031, programs pay education staff salaries comparable to those of preschool teachers in the local public school district, adjusted for responsibilities, qualifications, experience, and schedule or hours worked. While the rule exempts small agencies with 200 or fewer funded slots—about 22% of AIAN programs—most Tribal programs will be required to meet these standards.

As much as programs want to offer competitive salaries, without increased federal appropriations this becomes an unfunded mandate. The regulation also fails to address the urgent, current workforce crisis. For years, COLA increases have not kept pace with inflation, eroding the real value of Head Start funding. The chart below illustrates how, since FY2017, AIAN Head Start programs have lost nearly **9% of their purchasing power** despite annual COLA adjustments.



The **cumulative** purchasing-power loss since FY2017 ends up at **-8.78%** by FY2024 (i.e., programs are ~8.8% behind where they would be if COLAs had matched inflation each year).

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Recommended Solution: Increase Funding to Support Competitive Salaries

Pay parity is urgently needed in Head Start, but implementation of the Final Rule’s wage and benefit standards will require significant new investments from Congress. We appreciate the Senate’s FY2026 proposal to increase Head Start funding to \$12.36 billion, including \$77 million for a cost-of-living adjustment (COLA). However, this amount is well short of what programs need to meet inflation and implement workforce improvements. We are also concerned that the Senate proposes only \$8 million for the Tribal Colleges and Universities–Head Start Partnership Program—a \$2 million reduction from FY2025 levels—at a time when investment in Native workforce development is more critical than ever.

The administration’s FY2026 request and the House Appropriations Committee proposal both maintain level funding at \$12.272 billion, which, without accounting for inflation, represents an effective cut.

Implementation of the wage and benefits standards is estimated to cost \$1.5 billion annually through FY2033. To meet this need and support high-quality early childhood services, we urge Congress to adopt the National Head Start Association’s recommendation of \$14.91 billion for Head Start in FY2026. This investment would:

- ◆ Provide a **\$390 million COLA** to help programs retain qualified staff in a highly competitive labor

market;

- ◆ Expand **Quality Improvement Funding by \$459 million**, allowing programs to address local needs such as workforce compensation, mental health supports, and services for children with special needs;
- ◆ Increase investment in **Tribal Colleges and Universities–Head Start Partnerships by \$2 million**, to recruit and develop culturally and linguistically appropriate staff for AIAN programs;
- ◆ Allocate **\$450 million** to expand Head Start Preschool and Early Head Start through a competitive grant process, helping to reach more of the 74% of eligible preschoolers and 87% of eligible infants and toddlers who currently go unserved;
- ◆ Invest **\$634 million** in Head Start facilities improvement grants to address longstanding repair and safety needs that cannot be met within existing operating budgets.

We also urge the House to include Section 531 of the Senate FY 2026 Labor-HHS-Education Appropriations bill, which directs the Office of Head Start to award annual funding to grantees no later than 30 days before the start of their program year, ensuring timely and predictable funding for Tribal and all Head Start programs.

FY26 Recommendation: Head Start & Early Head Start | HHS – ACF – OHS

	FY23 Enacted	FY24 Enacted	FY25 CR	FY26 Recommendation
Cost-of-Living Adjustment (COLA)	+\$596,000,000	+\$275,000,000	\$0	+\$390,000,000
Quality Improvement Funding (QIF)	+\$262,000,000	\$0	\$0	+\$459,000,000
Tribal Colleges & Universities Partnership	+\$2,000,000	\$0	\$0	+\$2,000,000
Head Start Expansion Grants	+\$100,000,000	\$0	\$0	+450,000,000
Facilities Improvement Grants	\$0	\$0	\$0	+634,000,000
Total Enacted/Requested	\$11,996,820,000	\$12,271,820,000	\$12,271,820,000	\$14,906,820,000

Programs should not be forced to reduce their enrollment through change in scope requests in order to raise staff wages. Congress must provide the resources necessary to stabilize and strengthen the Head Start workforce while preserving access for children and families.



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Path Forward

AIAN Head Start and Early Head Start programs are a lifeline for children, families, and communities. But their ability to serve is increasingly jeopardized by federal policies and funding levels that do not reflect the realities of Indigenous communities. Current degree requirements limit the inclusion of Native knowledge keepers in the classroom. Low wages and high turnover strain program capacity and staff morale. Programs are often forced to submit change in scope requests—reducing the number of children they serve—in order to raise wages, despite the fact that a single classroom may be the only early childhood setting available in a Tribal community. The waiver system offers only temporary relief while ignoring systemic issues. These challenges are interconnected and require coordinated, culturally responsive policy solutions.

We urge Congress and the Administration to take immediate action to stabilize and grow the AIAN Head Start workforce by:

- ◆ Increasing Head Start funding to at least **\$14.91 billion in FY2026**, including dedicated investments in COLAs, Quality Improvement, and TCU-HS partnerships.
- ◆ Supporting the **HEADWAY Act** to remove unnecessary barriers to Early Head Start teacher recruitment.
- ◆ Authorizing **Tribal certification of Head Start teaching staff**, recognizing the value of Indigenous knowledge and Tribal sovereignty.

These actions are essential to ensure AIAN children receive early learning experiences that are not only developmentally appropriate, but also deeply rooted in their languages, cultures, and communities. Upholding the federal trust responsibility requires more than maintaining the status quo—it requires responsive investment and policy grounded in equity and respect for Tribal self-determination.

