



October 2, 2026

The Honorable Robert F. Kennedy, Jr.  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

Dear Secretary Kennedy:

On behalf of Children's Friend and the children and families we serve, we respectfully submit these comments on the Administration for Children and Families' proposed rule, "Reducing Federal Burden for Head Start Programs." Children's Friend, a nearly 200-year-old child and family service organization, is the largest provider of Head Start programs in Rhode Island, serving more than 800 children across our Head Start, Early Head Start, and Early Head Start Child Care Partnership programs.

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We support thoughtful efforts to reduce unnecessary administrative burden. However, changes of the magnitude proposed must be evaluated carefully to ensure that regulatory simplification does not diminish access, quality, safety, or accountability.

The Head Start Act requires that revisions to program standards not result in the elimination of, or any reduction in, the quality, scope, or types of health, educational, parental involvement, nutritional, social, or other services. It also requires consideration of research-based practices in early childhood education and development, services for children with disabilities, children experiencing homelessness, children in foster care, family services, program administration, and financial management.

**Consistent with these mandates in the Head Start Act, Children's Friend urges the Department to revise provisions that could negatively affect program quality or depart from established, research-based practice.**

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#### **1. Support multilingual learners through research-based instruction.**

Children's Friend supports the development of English proficiency for every Head Start child, but we oppose a prohibition on instruction in languages

other than English. Among Head Start children in Rhode Island, 43 percent are dual language learners (DLL); 40 percent of Early Head Start children are DLL. Research summarized by a 2017 consensus committee of the National Academies of Sciences, Engineering, and Medicine indicates that multilingual preschool children can learn English and build stronger long-term academic skills through bilingual instruction rather than English-only immersion<sup>i</sup>. A 2026 report on dual language learners in Head Start cites decades of research that shows that scientifically-based standards and instruction for DLLs should include embedding their home language alongside English, and that DLLs that receive dual language education exhibit better and faster English acquisition, higher reading and math scores, stronger language skills in both languages of instruction, faster exit from English language learning programming, and higher wages and more work opportunities for adults<sup>ii</sup>. There is strong evidence that English-only instruction is not effective. The proposed restriction also conflicts with Rhode Island regulations directing programs to facilitate preservation and development of multilingual learners' home-language skills. In addition, health and safety instructions must be communicated in a language a child can understand. Finally, an English-only classroom policy will significantly deter non-English speaking families from volunteering in the classroom and engaging in their child's education. When a classroom operates strictly under an English-only model, it builds invisible walls that alienate families.

## **2. Retain specific health, mental health, oral health, and disability protections.**

Health, mental health, oral health, and disability screening and supports are preventative in nature. They catch problems early and address issues before they escalate. In Rhode Island, 10 percent of Head Start children were evaluated for IDEA services, and 89 percent of those evaluated were identified as having a disability. We do not support eliminating specific screening requirements (areas of concern and timelines) that will result in deferred or delayed services. The Centers for Disease Control and Prevention emphasizes that early identification of developmental delays and disabilities help families obtain services as soon as possible<sup>iii</sup>. Screening, assessment, and evaluation should also remain integral to family goal setting, parent education, and individualized curriculum development.

## **3. Maintain strong staffing ratios and group-size standards.**

Class size and teacher-child ratios directly shape children's classroom experiences, their learning processes, and are a key component of quality. Current Head Start requirements exceed Rhode Island licensing standards in some circumstances, and that distinction reflects Head Start's commitment to quality. State licensing establishes a minimum threshold; Head Start standards should continue to set a higher bar as research shows a statistically significant effect on early care and education quality as a result of fewer children per adult and smaller group sizes<sup>iv</sup>.

## **4. Preserve meaningful program duration.**

Children's Friend does not support returning to outdated 1994 minimums for program hours and days. Research shows that programs with expanded hours boost children's school readiness. Reynolds et al. found that full-day programs produced greater gains in literacy and language

development, math skills, socio-emotional development, and physical health. Children in full-day programs also demonstrated higher levels of attendance and a 45 percent reduction in chronic absenteeism<sup>v</sup>. The Office of Head Start's research synthesis, *Head Start: What Do We Know About What Works?*, likewise found that longer hours produced greater and more durable gains<sup>vi</sup>. Six-hour days are also more consistent with public preschool and K–12 schedules and better meet the needs of working families.

#### **5. Protect meaningful staff qualifications.**

The quality of Head Start services is intricately tied to the quality of staff. Higher teacher qualifications are significantly correlated with higher quality early learning environments. Specifically, the education level of teachers/caregivers is positively correlated to overall quality, as well as subscale ratings including program structure, language, and reasoning<sup>vii</sup>. Additionally, the prohibition on requiring/incentivizing post-secondary education is in direct conflict with the HSA, which requires at least 50 percent of Head Start teachers nationwide in center-based programs have a baccalaureate degree; all education coordinators have a baccalaureate degree; and all teaching assistants have or be working towards a credential or degree.

#### **6. Continue limits on suspension and expulsion.**

Removing the expulsion prohibition from Head Start effectively denies services to some of the most vulnerable children. Additionally, according to Head Start, young children expelled from preschool are more likely to lose chances to learn, socialize with other children, and interact with positive adult role models; miss out on chances to develop and practice the very skills they may most need, including social and emotional skills; develop ongoing behavior problems that lead to school difficulty later on; experience harmful effects on development, education, and health; view themselves negatively or as not capable of learning; and develop negative views about learning, school, teachers, and the world around them<sup>viii</sup>. The final rule should retain strong protections against exclusionary discipline.

#### **7. Allow self-attestation when documentation is unavailable.**

It is always difficult, and sometimes impossible, to prove a negative. A family that is waiting for space in a shelter or staying with others while they search for permanent housing cannot generally produce documentation to prove their homelessness. Requiring documentation 100 percent of the time will create insurmountable bureaucratic barriers for the families most in need. We propose allowing self-attestation, with appropriate safeguards, as a last resort when traditional documentation is impossible.

#### **8. Retain prompt family contact after an unexplained absence.**

Currently, the Head Start regulations require that programs attempt to contact families when a child is unexpectedly absent and a parent has not contacted the program within one hour of program start time. This should remain a standard as these calls serve as a critical check-up on a child's wellbeing.

### **9. Preserve local authority to reserve enrollment slots.**

Current regulation states that no more than three percent of a program's slots may be reserved for homeless or foster children. If the reserved enrollment slot is not filled within 30 days, then it must be filled. Removing this 30-day window will create severe enrollment barriers for the most vulnerable children. Decisions regarding slot reservations should be driven by local community needs, based on the Head Start Community Assessment. If the assessment indicates a large population of homeless or foster families, the program should retain authority to preserve slots to flexibly and immediately serve those children and families who most need support.

### **10. Retain Parent Committees.**

Parent Committees serve essential functions in Head Start. Parent Committees prepare parents and help organizations like ours identify those who can serve on the Policy Council (mandated by the HSA). As they are site-based, these committees support hyper-local input into program design and services. Finally, Parent Committees support the home-school connection proven to positively impact attendance, behavior, and social skills.

### **11. Preserve adequate administrative capacity.**

Children's Friend does not support reducing the administrative cost cap from 15 percent to 5 percent. The 15 percent rate is the federal *de minimis* rate established by the Office of Management and Budget under Uniform Guidance, and Head Start awards should not be treated differently without a compelling basis. Research by Bridgespan also indicates that traditional nonprofit administrative caps, often set at 15 percent, are already too low to cover actual operating needs<sup>x</sup>. Administrative expenditures support continuous quality improvement, supervision of teachers and family workers, staff coaching, personnel support and wellness, safe facilities, and other functions essential to a high-quality Head Start program.

### **12. Protect Early Head Start's evidence-based home-visiting model.**

Sweeping changes proposed to the Early Head Start home visiting program will dismantle its designation as an evidence-based home visiting model. By removing specific regulations that govern the structure and delivery of these services, the program risks losing the strict operational fidelity required to maintain its proven, evidence-based results. National randomized control trials have found the current EHS model to be effective in improving parent and child outcomes, and that participation in EHS leads to fewer child welfare encounters between the ages of five and nine. Children in EHS were less likely to have been physically or sexually assaulted, and less likely to have been abused or neglected a second time. Children in EHS were also less likely to have been involved in substantiated reports of physical and/or sexual abuse<sup>x</sup>. We do not support the elimination of core services that contribute to the program's evidence-base, including the elimination of caseload limits; frequency and duration of home visit requirements; group socialization requirements; and home visitor credential requirements. Finally, reducing the current expectation of weekly home visits would remove critical support during the newborn and infancy periods.

Children's Friend supports responsible efforts to streamline federal requirements, but regulatory changes must not come at the expense of access, quality, safety, strong family engagement, or local responsiveness. We respectfully urge the Department to revise the proposed rule consistent with the Head Start Act and the research-based practices described above.

Thank you for considering these comments.

Sincerely,



David Caprio

President and Chief Executive Officer

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<sup>i</sup> National Academies of Sciences, Engineering, and Medicine. (2017). *Promoting the Educational Success of Children and Youth Learning English: Promising Futures*. Washington, DC: National Academies Press.

<sup>ii</sup> Soto-Boykin, X., Meek, S., Cardona, M., & Williams, C. (August, 2026). *Preserving Access and Opportunity in Head Start for Dual Language Learners: A Review of the Science, Legislative Mandates, and Regulatory Requirements*. The Children's Equity Project at Arizona State University. <https://cep.asu.edu/resources/dual-language-learners-head-start>.

<sup>iii</sup> Centers for Disease Control and Prevention. (n.d.). *Developmental monitoring and screening*. U.S. Department of Health and Human Services. <https://www.cdc.gov/act-early/about/developmental-monitoring-and-screening.html>.

<sup>iv</sup> Dalgaard, N. T., Bondebjerg, A., Klokke, R., Viinholt, B. C. A., & Dietrichson, J. (2022). Adult/child ratio and group size in early childhood education or care to promote the development of children aged 0–5 years: A systematic review. *Campbell Systematic Reviews*, 18, e1239.

<sup>v</sup> Reynolds, A. J., Richardson, B. A., Hayakawa, M., Lease, E. M., Warner-Richter, M., Englund, M. M., Ou, S. R., & Sullivan, M. (2014). Association of a full-day vs part-day preschool intervention with school readiness, attendance, and parent involvement. *JAMA*, 312(20), 2126–2134. <https://doi.org/10.1001/jama.2014.15376>.

<sup>vi</sup> Office of the Assistant Secretary for Planning and Evaluation (ASPE). (1990). *Head Start: What Do We Know About What Works*. U.S. Department of Health and Human Services.

<sup>vii</sup> Manning, M., Wong, G. T. W., Fleming, C. M., & Garvis, S. (2019). Is teacher qualification associated with the quality of the early childhood education and care environment? A meta-analytic review. *Review of Educational Research*, 89(3), 370–415. [doi.org](https://doi.org/10.1002/rev.1001).

<sup>viii</sup> Office of Head Start. (2025, July 1). *Understanding and eliminating expulsion in early childhood programs*. Early Childhood Learning and Knowledge Center. <https://headstart.gov/publication/understanding-eliminating-expulsion-early-childhood-programs>.

<sup>ix</sup> Bedsworth, W., Goggins Gregory, A., & Howard, D. (2008, April 1). *Nonprofit overhead costs: Breaking the vicious cycle of misleading reporting, unrealistic expectations, and pressure to conform*. The Bridgespan Group.

<sup>x</sup> Green, B. L., Ayoub, C., Bartlett, J. D., Von Ende, A., Furrer, C., Chazan-Cohen, R., Vallotton, C., & Klevens, J. (2014). The effect of Early Head Start on child welfare system involvement: A first look at longitudinal child maltreatment outcomes. *Children and youth services review*, 42, 127–135. <https://doi.org/10.1016/j.childyouth.2014.03.044>