

August 13, 2025



The Honorable Robert F. Kennedy, Jr.  
Office of the Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC, 20201

**Re: Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA);  
Interpretation of “Federal Public Benefit,” RIN: 0991-ZA57**

Dear Secretary Kennedy:

Spring Institute for Intercultural Learning is a nonprofit community-based organization that serves diverse low-income, multigenerational families in Colorado. Our programs promote family literacy, English language acquisition, community and civic engagement, and school and workforce readiness. High-quality early learning services, economic mobility and community growth, and family well-being fostered through initiatives such as Head Start are priorities for the population we serve. It is clear, based on our work and extensive research by the early childhood community, that the new interpretation the Department of Health and Human Services (HHS) is taking in regard to the definition of a “federal public benefit” under the Personal Responsibility and Work Opportunity Reconciliation Act will have a severe and negative impact on young Coloradans and their families across immigration backgrounds.

Head Start is a community-led, early education program that helps children in families with low incomes prepare for school by supporting their cognitive, social, and emotional development.<sup>1</sup> The program has never conditioned eligibility on citizenship or immigration status and, like many parts of the early learning sector, relies heavily on the work of immigrant early educators and may serve immigrant children and their families<sup>2</sup> who comprise approximately 10% of Colorado’s population. Service programs and participant families have relied on HHS’s longstanding interpretation that “federal public benefits” exclude Head Start.

It is clear that the main purpose of this notice is to erode Head Start programs and harm the communities they serve.

- Changes to eligibility criteria for Head Start have no meaningful impact on migration at the southern border, and a reversal in the interpretation of who can access the program will have meaningful negative impacts for communities’ public health and economic stability.
- The enrollment of immigrant families in Head Start does not impose a unique burden on U.S. citizens. The program is specifically designed to assist children from

---

<sup>1</sup> Office of Head Start, Administration for Children and Families, [“Head Start Services”](#); Head Start Policy and Regulation, [“Sec. 636 \[42 U.S.C. 9831\] Statement of Purpose”](#); Center for American Progress, April 16, 2025, [“5 Things to Know About Head Start.”](#)

<sup>2</sup> National Women’s Law Center, April 21, 2025, [“Four Things You Should Know About How Immigration Impacts Care Work.”](#); Hechinger Report, Jul 16, 2025, [“America’s Child Care System Relies on Immigrants. Without Them, It Could Collapse.”](#)

low-income families, those experiencing homelessness, and children in the foster care system. This mission has always included children regardless of their citizenship status. The integrity of Head Start has never been compromised by the enrollment of immigrant families, and there is no evidence to suggest that it encourages "illegal immigration."

This notice would create a chilling effect that will deter families from participating in Head Start, endangering the stability of those programs and harming communities that depend on the program for providing early childhood education and promoting healthy child development.

- This notice goes against the best interest of the U.S. As is discussed in a multistate study of immigration policy's effects on young children,<sup>3</sup> experiences early in life affect children's physical, social, and emotional development.
- Children of immigrants represent a large and growing share of young children, and the overwhelming majority of them are U.S. citizens. Their experiences, development, and education are essential to all of us. In fact, there is emerging evidence that the presence of immigrant students in classrooms boosts the test scores of their U.S.-born student peers.<sup>4</sup> Our collective future is tied to their education and well-being, as well as their success in school and later careers.

Furthermore, under PRWORA, millions of non-qualified immigrants are *already* excluded from a range of federal public benefits, including full scope Medicaid, Medicare, Temporary Assistance for Needy Families (TANF), and a host of other anti-poverty and social welfare programs. Even qualified immigrants, such as green card holders who are just one step removed from U.S. citizenship, often face a delay before they can access federal benefits. This structure has made it difficult, if not impossible, for many immigrant families to achieve economic mobility, pursue higher education, access affordable health care, and thrive as fully contributing members of U.S. communities. Expanding the definition of "federal public benefit" to further include essential programs such as Head Start as well as Title X and the Health Center Program, for example, threatens public health, degrades delivery systems, and undermines the broader economy by destabilizing family resources in critical spheres of housing, nutrition, education, and dental, medical, and mental health. In short, jeopardizing the livelihoods of immigrant families and further marginalizing some of our youngest and most vulnerable community members will only lead to more hardship and ultimately sabotage the success of our nation.

Investments in young children's health and well-being generate significant and enduring positive outcomes—and the U.S. economy benefits immensely from the contributions of immigrant families in Colorado and nationwide. **This notice risks devastating Head Start and other crucial programs and the communities they serve across the country.** This reversal on a nearly 30-year-old interpretation of PRWORA, in many cases, violates statutory requirements for changes to program eligibility, and is both broadly counterproductive and harmful to programs that indispensably serve vulnerable children and their families. **Spring Institute for Intercultural Learning strongly urges you to withdraw this notice.**

---

<sup>3</sup> Center for Law and Social Policy, March 2018, "[Our Children's Fear: Immigration Policy's Effects on Young Children](#)"

<sup>4</sup> David Figlio, Paola Giuliano, et. al., "Diversity in Schools: Immigrants and the Educational Performance of U.S.-Born Students," *The Review of Economic Studies*, Volume 91, Issue 2, April 2023, <https://doi.org/10.1093/restud/rdad047>