

October 5, 2026

Submitted via www.regulations.gov



Attention:

The Honorable Robert F. Kennedy, Jr.

Secretary, U.S. Department of Health and Human Services

Re: Docket ACF-2026-0595 / RIN 0970-AD30: Withdraw the Proposed Head Start Rule

Spring Institute for Intercultural Learning strongly opposes the proposed rule, “Reducing Federal Burden for Head Start Programs,” and urges the U.S. Department of Health and Human Services and the Administration for Children and Families to withdraw it.

For more than 45 years, Spring Institute has worked alongside immigrant and refugee families in Colorado through English language learning, career pathways, resource navigation, language access, early childhood home visiting, and other programs designed to help families thrive. Through this work, we see firsthand how access to high-quality, culturally and linguistically responsive early childhood services supports children while strengthening entire families and communities.

Head Start’s comprehensive approach is one of its greatest strengths. National standards help ensure that children and families can count on quality early education as well as appropriate health, developmental, mental health, family engagement, and other supports, regardless of where they live. Eliminating more than 1,400 federal requirements and shifting many decisions to state and local standards could result in significant differences in the protections and quality of services available to families across the country.

Of particular importance are proposed changes affecting staff-child ratios and group sizes; protections related to suspension and expulsion; health, mental health, and family engagement services; and supports for dual language learners. The proposed requirement that educational instruction be conducted in English, coupled with the elimination of requirements supporting bilingual staffing and dual language learning, is especially troubling. Research and experience in early childhood education demonstrate that supporting children’s home languages alongside English can strengthen English-language acquisition as well as children’s broader learning and development. An English-only approach would move Head Start away from these evidence-based practices and undermine the culturally and linguistically responsive learning environments that help multilingual children thrive.

For immigrant and refugee families, culturally and linguistically responsive services and meaningful family engagement are essential to ensuring that parents can understand, access, and fully participate in their children’s education and development. Multilingual staff play an especially important role in building trusting relationships with families, facilitating communication between parents and educators, and helping families participate as partners in their children’s learning. Removing requirements that support multilingual staffing risks creating new barriers between Head Start programs and the families they serve. These supports help build a strong foundation for children’s long-term success and strengthen families across generations.

An English-only approach could also make it more difficult for educators to accurately understand multilingual children’s development. English proficiency and developmental ability are *not* the same. Children should be

able to demonstrate what they know and can do without emerging English proficiency being mistaken for a developmental delay—or genuine developmental needs being overlooked because a child cannot yet fully communicate them in English.

Proposed changes to eligibility requirements could likewise create additional barriers for families experiencing poverty, housing instability, language barriers, or difficulty obtaining documentation. Administrative requirements should not prevent eligible children from accessing services intended to support their healthy development and long-term success.

Spring Institute recognizes the value of reducing unnecessary administrative burdens for Head Start providers. However, that goal should not come at the expense of consistent standards that safeguard children, promote meaningful family engagement, and help ensure equitable access to comprehensive services. Nor should efforts to reduce administrative burdens create new burdens for programs by requiring changes to multilingual staffing, curricula, classroom materials, and established approaches to serving dual language learners.

Head Start has served children and families for more than 60 years. We urge HHS and ACF to strengthen this vital program while preserving robust nationwide Head Start Program Performance Standards and the culturally and linguistically responsive practices that enable multilingual children and families to fully benefit from Head Start.

Spring Institute respectfully urges the Department to withdraw the proposed rule under docket ACF-2026-0595 and RIN 0970-AD30.

Thank you for the opportunity to comment on this important matter.

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