



RHODE ISLAND KIDS COUNT
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To: The Honorable Robert F. Kennedy, Jr., Secretary, U.S. Department of Health and Human Services

From: Paige Parks, Executive Director

Re: Proposed reinterpretation of Personal Responsibility and Work Opportunity Reconciliation Act of 1996

Date: August 13, 2025

Thank you for the opportunity to review and provide comments on the proposed reinterpretation of the *Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996*.

Rhode Island KIDS COUNT, a statewide children’s policy organization, strongly opposes the proposed reinterpretation of PRWORA’s “public benefit” to apply to new programs that have never been included in this law. Adding new paperwork requirements for programs and families will increase the costs of program administration and delay and disrupt access to basic services for children statewide, including many children and families who are not the focus of this proposed policy.

Head Start provides vital high-quality early education and child care services for young children from infancy through entry to kindergarten. In October 2024, there were 1,438 Rhode Island children enrolled in Head Start. In Rhode Island and other states, the federal funding and technical assistance for Head Start helps improve the quality of early care and education available statewide.

In 2024 in Rhode Island, licensed early care and education centers in Rhode Island that have Head Start funding were much higher quality than generally available programs with 90% of infant/toddler seats and preschool seats meeting research-based, high-quality standards that are known to improve outcomes. In comparison, only 22% of infant/toddler seats and 30% of the preschool seats in the state met these standards.

In Rhode Island, Head Start funding is braided with state Pre-K funding to provide high-quality preschool educational opportunities for children ages three and four from families of all income levels. As of 2024, 45% of low-income children and 30% of all four-year-old children and another 9% of low-income and 5% of all three-year-old children were enrolled in high-quality preschool through state and federal investment.

Essential Health Services Reinterpreting the definition of “federal public benefit” to include essential health programs threatens public health, delivery systems, and the broader economy. Increasing paperwork and limiting

access to critical health care programs threatens to destabilize the broader health care system serving children and families. Confusion about eligibility and fear of immigration consequences will discourage eligible children, including U.S. citizen children, from accessing needed care.

Limiting access to community-based health care does not eliminate children's need for services, it shifts the burden to hospital emergency departments and to state systems and taxpayers. People who are unable to access community-based health care inevitably enter the health care system at more complex and expensive points, ultimately costing taxpayers more money.

Title X Family Planning provides critical resources dedicated to providing access to affordable family planning care. In many areas, it is the only available source of essential health care. Restricting these services will significantly reduce access to the prenatal care necessary to ensure safe and healthy births and likely increase costs associated with NICU stays.

Community Health Centers connect families to low-cost, high-quality, comprehensive medical, dental, and mental health services. Rhode Island health centers provide newborn care, well-child exams, and manage social, emotional, and physical issues requiring routine management, such as diabetes, to all Rhode Island children, making health care accessible. Community Health Centers provide primary and preventive care services, which are crucial for managing chronic conditions and promoting overall health.

Certified Community Behavioral Health Clinics provide vital mental health support to children and families. In 2021, the American Academy of Pediatrics, the American Academy of Child and Adolescent Psychiatry, and the Children's Hospital Association declared a national emergency for children's mental health which persists to this day. As day-to-day economic stress worsens for most young families with children at home, access to mental health care for parents and children becomes even more essential.

The changes proposed by the U.S. Department of Health and Human Services will increase program administrative costs, increase the paperwork burden on families, and limit access to essential services needed to promote the health, safety, development and learning of children. We oppose this reinterpretation of a 1996 law.

Please don't hesitate to contact me with any questions at pparks@rikidscount.org.